Olympic Region Clean Air Agency
2940 Limited Lane NW
Olympia, WA 98502

1-800-422-5623 or
(360) 539-7610
Fax: (360) 491-6308

www.ORCAA.org

Executive Director
Francea L. McNair

Serving Clallam, Grays Harbor, Jefferson, Mason, Pacific, and Thurston counties.

Air Operating Permit (AOP)

Westport, LLC

AOP - Renewal
14AOP1029
March 1, 2021

AIR OPERATING PERMIT

Olympic Region Clean Air Agency
ORCAA

ISSUED IN ACCORDANCE WITH:
40 CFR Part 70, Chapter 70A.15 RCW, and Chapter 173-401 WAC

PERMIT NO:	14AOP1029
ISSUANCE DATE:	March 1, 2021
EXPIRATION DATE:	March 1, 2026
PERMITTEE & MAILING ADDRESS:	Westport LLC PO Box 308 Westport, WA 98595
FACILITY LOCATION:	1807 N. Nyhus Westport, WA 98595
FACILITY DESCRIPTION:	Fiberglass Yacht Manufacturer
ORCAA File #:	474
PRIMARY SIC:	3732
NAICS:	336612

PREPARED BY: Lauren Whybrew 2/23/2021
Lauren Whybrew, Engineer I

REVIEWED BY: Mark V Goodin 3/1/2021
Mark V. Goodin, Professional Engineer

APPROVED BY: Francea McNair 3/1/2021
Francea L. McNair, Director

Contents

I. Abbreviations and Definitions

Definitions from 40 CFR Part 63, Subpart II

Certify means, in reference to the volatile organic compounds (VOC) content or volatile organic hazardous air pollutants (VOHAP) content of a coating, to attest to the VOC content as determined through analysis by Method 24 of appendix A to 40 CFR part 60 or through use of forms and procedures outlined in appendix A of this subpart, or to attest to the VOHAP content as determined through an Administrator-approved test method. In the case of conflicting results, Method 24 of appendix A to 40 CFR part 60 shall take precedence over the forms and procedures outlined in appendix A to this subpart for the options in which VOC is used as a surrogate for VOHAP.

Ship means any marine or fresh-water vessel used for military or commercial operations, including self-propelled vessels, those propelled by other craft (barges), and navigational aids (buoys). This definition includes, but is not limited to, all military and Coast Guard vessels, commercial cargo and passenger (cruise) ships, ferries, barges, tankers, container ships, patrol and pilot boats, and dredges. For purposes of this condition, pleasure crafts and offshore oil and gas drilling platforms are not considered ships.

Volatile organic hazardous air pollutants (VOHAP) means any compound listed in or pursuant to section 112(b) of the CAA that contains carbon, excluding metallic carbides and carbonates. This definition includes VOC listed as HAP and exempt[1] compounds listed as HAP.

Abbreviations

The following is a list of abbreviations used in this permit.

A#	Refers to a specific administrative term or condition numbered "#"
Administrator	EPA Region X Administrator
A#	Refers to a specific permit administration term or provision numbered "#"
AOP	Air Operating Permit
AP-42	EPA Compilation of Emission Factors, AP-42, Fifth Edition, Volume I
AR#	Refers to a specific applicable requirement numbered "#"
ASTM	American Society for Testing and Materials
CBI	Confidential Business Information
CFR	Code of Federal Regulations
CO	Carbon monoxide

[1] Exempt compounds mean specified organic compounds that are not considered VOC due to negligible photochemical reactivity. Exempt compounds are specified in 40 CFR § 51.100.

CO_2	Carbon Dioxide
Ecology	Washington State Department of Ecology
EPA	U.S. Environmental Protection Agency
FCAA	Federal Clean Air Act
EU#	Refers to a specific emissions unit numbered "#"
G#	Refers to a specific general term or condition numbered "#"
grain/dscf	Concentration in terms of grains per dry standard cubic feet
HAP	Hazardous Air Pollutant
hp	Horsepower
M#	Refers to a specific monitoring term or condition numbered "#"
MACT	Maximum Achievable Control Technology
MMBtu/hr	Million British Thermal Units per hour
NESHAP	National Emission Standards for Hazardous Air Pollutants
NAICS	North American Industry Classification System
NOC	Notice of Construction
NO_x	Oxides of Nitrogen
NSPS	New Source Performance Standards
NSR	New Source Review
O&M	Operations and Maintenance Plan
ORCAA	Olympic Region Clean Air Agency
PA#	Refers to a specific prohibited activity term or provision numbered "#"
PM	Particulate matter air pollution
PM_{10}	Particulate matter with aerodynamic diameter less than 10 microns
$PM_{2.5}$	Particulate matter with aerodynamic diameter less than 2.5 microns
ppm	Parts per million by volume (assumed standard and dry)
PSD	Prevention of Signification Deterioration
PW#	Refers to a plant-wide applicable requirement numbered "#"
RACT	Reasonably Available Control Technology
R#	Refers to a specific reporting term or condition numbered "#"
RCW	Revised Code of Washington
REQ	Requirement
RICE	Reciprocating Internal Combustion Engine
RK#	Refers to a specific recordkeeping term or condition numbered "#"
S#	Refers to a specific permit shield term or provision numbered "#"
SIC	Standard Industrial Classification
SO_2	Sulfur dioxide
TSP	Total Suspended Particulate
TAP	Toxic Air Pollutant as defined in Chapter 173-460 WAC
TPY	Tons per year
VOC	Volatile Organic Compounds
VOHAP	Volatile Organic Hazardous Air Pollutant
WAC	Washington Administrative Code

§	Refers to a section out of the Code of Federal Regulation

[END OF SECTION]

II. Regulatory Basis

Pursuant to Chapter 173-401 Washington Administrative Code (WAC), the “Permittee”, Westport, LLC (Westport), is authorized to operate their yacht manufacturing Facility (Facility) located at 1807 N Nyhus in Westport, Washington, in accordance with the terms and conditions listed in this permit.

This permit includes terms and conditions sufficient to assure compliance with all applicable air-related requirements at the time the permit was issued. The terms and conditions in this permit contain applicable emission limitations, performance standards, operating requirements, and other air-related applicable requirements as required under WAC 173-401-600, and monitoring, recordkeeping, and reporting requirements as required under WAC 173-401-615. In instances where an applicable limit or standard does not specify monitoring, or specifies monitoring but the monitoring is insufficient to assure compliance with the requirement, monitoring sufficient to assure compliance was added to the permit under as required by WAC 173-401-615(1)(b), which is pursuant to authorities provided under 40 CFR §70.6(a)(3)(i)(B) and 40 CFR §70.6(c)(1) of the Federal Clean Air Act.

All terms and conditions of this permit, including any provisions designed to limit potential to emit, are enforceable under the Federal Clean Air Act (FCAA) unless specifically identified as not federally enforceable in the "regulatory basis" description that follows each condition. Conditions identified as "local only" are enforceable only by Olympic Region Clean Air Agency (ORCAA). Conditions identified as “state/local only” are enforceable only by ORCAA and state of Washington.

The conditions in this permit contain abbreviated and, in some cases, paraphrased versions of the language of the applicable requirements from the underlying laws, regulations and regulatory orders. Unless the text of the term is specifically identified to be directly enforceable, the language of the cited applicable requirement takes precedence. Any difference between the description of an applicable requirement in this permit compared to the corresponding law, regulation or order is provided for purposes of clarifying the underlying requirement. The legal requirement remains the underlying applicable requirement cited in the “Applicable Requirement” column of the tables and the citations contained in brackets at the end of each requirement. Any perceived conflicts between the permit and an underlying applicable requirement will be resolved by referring to the cited applicable requirement.

Unless otherwise stated, terms used in the conditions of this permit shall be defined consistent with their definitions from the corresponding referenced regulations. If not defined in the referenced regulations, terms shall be defined consistent with the definitions contained in Chapter 70A.15 RCW, WAC 173-401-200, WAC 173-400-030, and ORCAA Rule 1.4. Terms not defined in this permit or by applicable regulation shall be defined consistent with the Merriam-Webster's Collegiate Dictionary, Eleventh Edition © 2003 by Merriam-Webster Inc.

Unless otherwise stated, the versions of the referenced laws, regulations and orders cited in this permit are the versions that were in effect on the date this permit was issued.

[END OF SECTION]

III. Emission Unit (EU) Identification

The following emissions units are covered under this permit.

Table 1: Emissions Units Covered Under Permit

Note: The information in Table 1 is for purposes of description only and is not intended as a limitation.

EU#	Building	Name/Description	Controls
EU1	Building 9	Lamination	Ventilation stack system with filters
EU2	Building 2	Lamination and mixing booth	Ventilation stack system with filters
EU3	Building 2	Coating, cutting, and sanding	Four booths: • Two spray booths (Booth 1 and 2) • Two prep booths (Prep Booth 1 and 2)
EU4	Building 4	Lamination	Ventilation stack system with filters
EU5	Building 5	Coating – large spray building	Ventilation stack system with filters
EU6	Building 7 Assembly Area	Large parts assembly and finishing. Includes sanding, secondary lamination (hand lay-up techniques only) and surface coating.	Sanders/grinders with vacuums when practicable and keeping doors closed during sanding/grinding operations.
EU7	Building 7 Annex – Bay Seven	Bay seven – sanding. Some surface coating and lamination with de-minimis emissions.	Ventilation stack system with filters
EU8	Building 7 Annex – Metal Working	Metal working	Baghouse type fabric filter unit. Exhausts to the exterior of Building 7.
EU9	Building 7 Annex – Carpentry Shop	Carpentry Shop – used for fitting, repairing, etc., wood cabinets.	Baghouse that exhausts to the exterior of Building 7.
EU10	Building 7 Annex – Cabinet Shop	Cabinet Shop – epoxy room, sanding stations, paint booth, drying room.	Epoxy Room – Two roof vents with pleated filters. Sanding Stations – None.

			Paint Booth – Ventilation stack system with filters Drying Room – None.
EU11	Building 9	Emergency Engine Rated Horsepower: 717 HP Manufacture Date: Feb. 27, 2006	None.
EU12	Building 7	Emergency Engine Rated Horsepower: 643 HP	None.
EU13	Building 5 (adjacent to Building 2 and Building 5)	Emergency Engine Rated Horsepower: 330 HP	None.
EU14	Building 1	Metal etching and evaporator	None.
EU15	Building 7 & 8	2.5 MMBtu/hr propane boiler	None.
EU16	Building 7 & 8	2.5 MMBtu/hr propane boiler	None.

[END OF SECTION]

IV. Permit Administration (A)

Permit administration conditions govern administration of the permit and include AOP administrative and other requirements that have no ongoing compliance monitoring requirements. The Permittee must comply with the requirements listed below and must certify compliance annually. Unless the text of the term is specifically identified to be directly enforceable, the language of the cited applicable requirement takes precedence.

A1. Permit Duration. This permit is issued for a fixed term of 5 years from date of issuance.
[Origin: WAC 173-401-610]
[Authority: WAC 173-401-600(1)(b)]

A2. Federally Enforceable Requirements:

a) All terms and conditions in this air operating permit, including any provision designed to limit potential to emit, are enforceable by the Administrator and citizens under the FCAA, except as indicated in b) below.

b) Notwithstanding subsection (a) of this condition, 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 and WAC 173-401-820.

[Origin: WAC 173-401-625]
[Authority: WAC 173-401-600(1)(b)]

A3. Standard Conditions:

a) Need to Halt or Reduce Activity Not a Defense. It shall not be a defense for the 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. *[Origin: WAC 173-401-620(2)(b)]*

b) 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 re-issuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. *[Origin: WAC 173-401-620(2)(c)]*

c) Property Rights. This permit does not convey property rights of any sort, or any exclusive privilege. *[Origin: WAC 173-401-620(2)(d)]*

d) Emission Trading. No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, other similar programs or processes for changes that are provided for in the permit. *[Origin: WAC 173-401-620(2)(g)]*

e) Severability. If any provision of this permit is to be held invalid, all unaffected provisions of the permit shall remain in effect and enforceable. *[Origin: WAC 173-401-620(2)(h)]*

f) Permit Appeals. This permit or any conditions in it may be appealed only by filing an appeal with the Washington State Pollution Control Hearings Board and serving it on

ORCAA within thirty days from receiving the permit pursuant to RCW 43.21B.310. The provision for appeal in this section is separate from and in addition to any federal rights to petition and review under section 505(b) of the FCAA. *[Origin: WAC 173-401-620(2)(i)]*

g) Permit continuation. This permit and all terms and conditions contained herein, including any permit shield provided under WAC 173-401-640, shall not expire until the renewal permit has been issued or denied if a timely and complete application has been submitted. An application shield granted pursuant to WAC 173-401-705(2) shall remain in effect until the renewal permit has been issued or denied if a timely and complete application has been submitted. This protection shall cease to apply if, subsequent to a completeness determination, the applicant fails to submit any additional information identified as being needed to process the application by the deadline as specified, in writing, by ORCAA. *[Origin: WAC 173-401-620(2)(j)]*

[Origin: Listed per sub-condition]
[Authority: WAC 173-401-620(2)]

A4. Permit Renewal Application. The Permittee shall submit a complete renewal application to ORCAA at least 12 months, but no more than 18 months, prior to the expiration date of this permit.
[Origin: WAC 173-401-710(1)]
[Authority: WAC 173-401-600(1)(b)]

A5. Permit Expiration – Application Shield. Permit expiration terminates the Permittee's right to operate unless a timely and complete renewal application has been submitted consistent with Condition A4. All terms and conditions of the permit shall remain in effect after the permit itself expires if a timely and complete permit application has been submitted.
[Origin: WAC 173-401-710(3)]
[Authority: WAC 173-401-600(1)(b)]

A6. Permit Revocation. 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 days written notice to the holder of a current operating permit prior to revocation of the permit or denial of a permit renewal application. Such notice shall include an explanation of the basis for the proposed action and afford the Permittee/applicant an opportunity to meet with the 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.
[Origin: WAC 173-401-710(4)]
[Authority: WAC 173-401-600(1)(b)]

A7. Reopening for Cause – Proceedings to Reopen. The permit shall be reopened and revised under any of the following circumstances:

a) Additional requirements become applicable to the source with a remaining permit term of three or more years. Such a reopening shall be completed not later than eighteen 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) ORCAA or the Administrator determines that the permit contains a material mistake or inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit; or

d) ORCAA or the Administrator determines 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 that apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists. Reopening under this section shall not be initiated before a notice of such intent is provided to the Permittee by the permitting authority. Such notice shall be made at least 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.
[Origin: WAC 173-401-730]
[Authority: WAC 173-401-600(1)(b)]

A8. Changes Not Requiring Permit Revision/Off Permit Changes. The Permittee may make the changes described in WAC 173-401-722 and WAC 173-401-724 without revising this permit, provided the changes satisfy the criteria set forth in those sections, including the requirements to notify ORCAA and EPA.
[Origin: WAC 173-401-722; WAC 173-401-724]
[Authority: WAC 173-401-600(1)(b)]

A9. Administrative Permit Amendments. The Permittee may request an "administrative permit amendment" for the following types of permit revisions:

a) Correction of typographical errors;

b) Change the name, address, or phone number of any person identified in the permit, or provide a similar minor administrative change at the source;

c) Require more frequent monitoring or reporting by the Permittee;

d) Allow for a change in ownership or operational control of a source where the permitting authority determines that no other change in the permit is necessary, provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new Permittee has been submitted to the permitting authority; and,

e) Incorporate into the AOP permit the terms, conditions, and provisions from orders approving NOC applications processed under an EPA-approved program.

Application and approval of administrative permit amendment applications shall conform to the procedures in WAC 173-401-720.
[Origin: WAC 173-401-720]
[Authority: WAC 173-401-600(1)(b)]

A10. Permit Modifications. Permit revisions that cannot be accomplished using the provisions for administrative permit amendments shall be applied for and approved as a permit modification according to WAC 173-401-725.
[Origin: WAC 173-401-725]
[Authority: WAC 173-401-600(1)(b)]

A11. Credible Evidence. For purposes of certifying compliance or establishing whether or not the Permittee has violated or is in violation of this permit, nothing shall preclude the use, including the exclusive use, of any credible evidence or information relevant to whether a source would have been in compliance with the requirements if the appropriate performance or compliance test or procedure had been performed.
[Origin: 40 CFR § 51.212; 40 CFR § 52.12; 40 CFR § 52.33; 40 CFR § 61.12]
[Authority: WAC 173-401-600(1)(a)]

A12. Emergency Provision.

- **a) Definition.** An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God and force majeure, which requires immediate corrective action to restore normal operation, and causes the source to exceed a technology-based emission limitation under the AOP, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.
- **b) Effect of an Emergency.** An emergency constitutes an affirmative defense to an action brought for noncompliance with such technology-based emission limitations.
- **c) Reporting.** To qualify as an emergency, the Permittee must report the emergency to ORCAA according to Condition R4.
- **d) Criteria.** The affirmative defense of emergency must be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that demonstrating to ORCAA that:
  - **i)** An emergency occurred and the Permittee can identify the cause(s) of the emergency;
  - **ii)** The Facility was at the time being properly operated;
  - **iii)** During the period of the emergency the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the AOP; and,
  - **iv)** The notice submitted to ORCAA must contain descriptions of:
    - **(1)** The emergency;
    - **(2)** Steps taken to mitigate emissions;

(3) Corrective actions taken;
(4) The probable cause; and,
(5) Preventative measures taken.

e) Burden of Proof. In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

f) Relationship to Other Rules. This provision is in addition to any emergency or upset provision contained in any applicable requirement.

[Origin: WAC 173-401-615; WAC 173-401-645; ORCAA Rule 8.7 (local only)]
[Authority: WAC 173-401-600(1)(b)]

A13. Unavoidable Excess Emissions (Current SIP). The following conditions apply until the effective date of EPA's removal of the September 20, 1993 version of WAC 173-400-107 from the Washington State Implementation Plan after which they become inapplicable:

a) Effect of "Unavoidable Excess Emissions" Determination. Excess emissions determined to be unavoidable under the procedures and criteria in this condition shall be excused and not subject to penalty.

b) Burden of Proof. To qualify for relief, the Permittee shall have the burden of proving to ORCAA in an enforcement action, the excess emissions were unavoidable. This demonstration shall be a condition in obtaining relief (from penalty).

c) Criteria. Excess emissions due to an upset or malfunction will be considered unavoidable provided the Permittee:

i) Reports as required under Condition R4.

ii) Upon request by ORCAA, submits a full written report including the known causes, the corrective actions taken, and the preventive measures to be taken to minimize or eliminate the chance of recurrence.

iii) For excess emissions due to startup or shutdown conditions, the Permittee adequately demonstrates the excess emissions could not have been prevented through careful planning and design and, if a bypass of control equipment occurs, such bypass was necessary to prevent loss of life, personal injury, or severe property damage.

iv) For excess emissions due to scheduled maintenance, the Permittee adequately demonstrates the excess emissions could not have been avoided through reasonable design, better scheduling for maintenance or through better operation and maintenance practices.

v) For excess emissions due to a malfunction or upset, the Permittee adequately demonstrates that:

(1) The event was not caused by poor or inadequate design, operation, maintenance, or any other reasonably preventable condition;

(2) The event was not of a recurring pattern indicative of inadequate design, operation, or maintenance; and,

(3) The Permittee 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 Permittee knew or should have known that an emission standard or permit condition was being exceeded.

[Origin: WAC 173-400-107; ORCAA Rule 8.7 (local only)]
[Authority: WAC 173-401-600(1)(b)]

A14. Unavoidable Excess Emissions (Post SIP Change). The following conditions apply starting the effective date of EPA's removal of the September 20, 1993 version of WAC 173-400-107 from the Washington State Implementation Plan:

- **a) Effect of "Unavoidable Excess Emissions" Determination.** Excess emissions determined to be unavoidable under the procedures and criteria in this section are:
  - **i)** A violation subject to WAC 173-400-230(3), (4), and (6); but
  - **ii)** Not subject to civil penalty under WAC 173-400-230(2).
- **b) Determination.** ORCAA determined whether excess emissions are unavoidable based on the information supplied by the Permittee and the criteria in subsection (g) of this condition.
- **c) Burden of Proof.** To qualify for relief, the Permittee shall have the burden of proving to ORCAA in an enforcement action that excess emissions were unavoidable. This demonstration shall be a condition to obtaining relief under (a)(ii) of this condition. To claim emissions as unavoidable under this condition, reported information must include:
  - **i)** Properly signed contemporaneous records or other relevant evidence documenting the Permittee's actions in response to the excess emissions event;
  - **ii)** Information on whether installed emission monitoring and pollution control systems were operating at the time of the exceedance. If either or both systems were not operating, information on the cause and duration of the outage; and,
  - **iii)** Any additional information requested by ORCAA to support the claim the excess emissions were unavoidable.
- **d) Limitation.** This condition (Condition A14) does not apply to an exceedance of an emission standard in 40 CFR Parts 60, 61, 62, 63, or 72, or ORCAA's adoption by reference of these federal standards.
- **e) Startups and Shutdowns.** Excess emissions that occur due to an upset or malfunction during a startup or shutdown event are treated as an upset or malfunction under subsection (g) of this section.
- **f) Criteria.** Excess emissions due to an upset or malfunction will be considered unavoidable provided the Permittee reports as required under Condition R4 and adequately demonstrates to ORCAA that:
  - **i)** The event was not caused by poor or inadequate design, operation, maintenance, or any other reasonably preventable condition;
  - **ii)** The event was not of a recurring pattern indicative of inadequate design, operation, or maintenance;
  - **iii)** The Permittee took immediate and appropriate corrective action in a manner consistent with safety and good air pollution control practice for minimizing emissions during the event, taking into account the total emissions impact of the corrective action, when the Permittee knew or should have known that an emission

standard or other permit condition was being exceeded (Actions taken could include slowing or shutting down the emission unit as necessary to minimize emissions);

iv) If the emitting equipment could not be shut down during the malfunction or upset to prevent the loss of life, prevent personal injury or severe property damage, or to minimize overall emissions, repairs were made in an expeditious fashion;

v) All emission monitoring systems and pollution control systems were kept operating to the extent possible unless their shutdown was necessary to prevent loss of life, personal injury, or severe property damage;

vi) The amount and duration of the excess emissions (including any bypass) were minimized to the maximum extent possible; and

vii) All practicable steps were taken to minimize the impact of the excess emissions on ambient air quality.

g) Required Information. In addition to the information required under Condition R4, the excess emissions report to ORCAA must include:

i) Properly signed contemporaneous records or other relevant evidence documenting the Permittee's actions in response to the excess emissions event;

ii) Information on whether installed emission monitoring and pollution control systems were operating at the time of the exceedance. If either or both systems were not operating, information on the cause and duration of the outage; and

iii) Any additional information requested by ORCAA to support the claim the excess emissions were unavoidable.

[Origin: WAC 173-400-109; ORCAA Rule 8.7 (local only)]
[Authority: WAC 173-401-600(1)(b)]

[END OF SECTION]

V. General Terms and Conditions (G)

G1. Operating Permit Fees. The Permittee shall pay operating permit fees according to ORCAA Rule 3.2 as follows:

- **a)** Operating permit fees include annual air operating permit fees and annual Ecology development and oversight fees. *[Origin: ORCAA Rule 3.2(c)]*
- **b)** Upon receipt of a fee invoice from ORCAA, annual fees are due and payable and shall be deemed delinquent if not fully paid within thirty (30) days. However, the Permittee may choose to pay annual fees in quarterly installments by indicating so on the fee invoice received and remitting payment of the first quarterly installment back to the Agency. These installments shall be due October 1, January 1, and April 1, following initial payment. Quarterly installments shall be equal to twenty-five percent (25%) of the total fee amount due. Any penalty shall be in addition to the fee amount due. *[Origin: ORCAA Rule 3.2(j)]*
- **c)** Clarification. ORCAA prints the fee due date directly on all operating permit fee invoices. Any operating permit fees not paid on or before the due date printed on the invoice are considered late. *[Added for clarification per WAC 173-401-630]*
- **d)** Late Payment. The Permittee shall pay a late penalty equal to twenty-five percent (25%) of the fee amount due if assessed by ORCAA for failure to pay the annual fee or installment by the Invoice Due Date. Any late penalty shall be in addition to the fee amount due. *[Origin: ORCAA Rule 3.2(k)]*
- **e)** Annual fees may be appealed per the procedure specified in ORCAA Rule 1.8. The basis for such appeals shall be limited to arithmetic or clerical errors. *[Origin: ORCAA Rule 3.2(l)]*
- **f)** Transfer of ownership of an Operating Permit source shall not affect any obligation to pay annual fees required by ORCAA Rule 3.2. Any liability for fee payment, including payment of delinquent fees and other penalties, shall survive any transfer of ownership of an Operating Permit source. *[Origin: ORCAA Rule 3.2(n)]*

[Origin: ORCAA Rule 3.2 and as noted per sub-condition above]
[Authority: WAC 173-401-620(2)]

G2. Duty to Supplement or Correct Application. The Permittee, upon becoming aware that any relevant facts were omitted, or incorrect information was submitted in the permit application, shall promptly submit such facts or corrected information.
[Origin: WAC 173-401-500(6)]
[Authority: WAC 173-401-600(1)(b)]

G3. Confidential Information. The Permittee is responsible for certifying and clearly identifying any information considered proprietary and confidential. In the case where a Permittee has submitted information to ORCAA under a claim of confidentiality, ORCAA may also require the Permittee to submit a copy of such information directly to the Administrator of EPA. The Permittee is responsible for clearly identifying information considered proprietary and

confidential prior to submittal to ORCAA. In addition, all confidential information shall be submitted according to ORCAA's Public Records and Confidentiality Procedures.
[Origin: WAC 173-401-500(5); WAC 173-401-630(1); ORCAA Rule 1.6 (local only)]
[Authority: WAC 173-401-600(1)(b)]

G4. Duty to Provide Information. The Permittee shall furnish to ORCAA, within a reasonable time, any information that ORCAA 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 ORCAA copies of records that the Permittee is required to keep by this permit, or for information claimed to be confidential, the Permittee may furnish such records directly to ORCAA along with a claim of confidentiality per Condition R2. Permitting authorities shall maintain confidentiality of such information in accordance with RCW 70A.15.2510.
[Origin: WAC 173-401-620(2)(e)]
[Authority: WAC 173-401-620(2)]

G5. Certification. All documents required to be submitted by this permit shall contain certification by a responsible official of truth, accuracy, and completeness. Documents include any application form, report, or compliance certification including but not limited to test plans and results, monitoring plans and results, applications, emissions inventory submittals, equipment malfunction reports or annual compliance certification. Such certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Provided, however, where a report is sent more frequently than once every six months, the responsible official's certification need only be submitted once every six months, covering all required reporting since the date of the last certification.
[Origin: WAC 173-401-520; WAC 173-401-615(3)(a); WAC 173-401-630(1)]
[Authority: WAC 173-401-600(1)(b)]

G6. Duty to Comply. The Permittee shall comply with all conditions of this permit. Any permit noncompliance constitutes a violation of Chapter 70.A15 RCW and, for federally enforceable provisions, a violation of the FCAA. Such violations are grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application.
[Origin: WAC 173-401-620(2)(a)]
[Authority: WAC 173-401-620(2)]

G7. Compliance Maintenance. The Permittee shall maintain compliance with all applicable requirements with which the source was in compliance as of the date of permit issuance. The Permittee shall meet on a timely basis any applicable requirements that become effective during the permit term.
[Origin: WAC 173-401-510(2)(h)(iii); WAC 173-401-630(3)]
[Authority: WAC 173-401-600(1)(b)]

G8. Inspection and Entry. Upon presentation of appropriate credentials, the Permittee shall allow a representative from ORCAA or an authorized representative to perform the following:

- **a)** Enter upon the premises where a Chapter 173-401 WAC source is located or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- **b)** Have access to and copy at reasonable times any records that must be kept under the conditions of this permit;
- **c)** Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- **d)** Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or other applicable requirements.
- **e)** Nothing in this condition or permit shall limit the ability of EPA to inspect or enter the premises of the Permittee under Section 114 or other provisions of the Federal Clean Air Act.

[Origin: WAC 173-401-630(2)]
[Authority: WAC 173-401-600(1)(b)]

G9. Access for Inspection. No person shall refuse entry or access to an ORCAA representative who requests entry for the purpose of inspection, and who presents appropriate credentials; nor shall any person obstruct, hamper or interfere with any such inspection.
[Origin: ORCAA Rule 1.5(e) (local only); ORCAA Rule 7.1 (local only)]
[Authority: WAC 173-401-600(1)(b)]

G10. Insignificant Emission Units. The following applies to emissions units determined insignificant based on actual emissions in accordance with WAC 173-401-530(1)(a):

- **a)** Any emission unit or activity qualifying as insignificant solely on the basis of provisions in WAC 173-401-530(1)(a) shall not exceed the emission thresholds specified in WAC 173-401-530(4) until this permit is modified.
- **b)** Upon request from the permitting authority the Permittee must provide sufficient documentation to enable the permitting authority to determine the emission unit or activity has been appropriately listed as insignificant.
- **c)** Upon request from the permitting authority, at any time during the term of the permit, the Permittee shall demonstrate to the permitting authority the actual emissions of any unit or activity claimed insignificant on the basis of actual emissions are below the emission thresholds listed in WAC 173-401-530(4).

[Origin: WAC 173-401-530]
[Authority: WAC 173-401-600(1)(b)]

G11. New Source Review. Prior to commencing any new installation, replacement, modification or alteration of any stationary source, emission unit, area source or fugitive source, the Permittee shall secure all necessary approvals under Rule 6.1 of ORCAA Regulations.
[Origin: WAC 173-400-110; WAC 173-460-040; ORCAA Rule 6.1 (local only); ORCAA Rule 8.6(a) (local only)]

[Authority: WAC 173-401-600(1)(b)]

G12. Replacement or Substantial Alteration of Existing Control Equipment. Notification, review and approval by ORCAA according to Rule 6.1 of ORCAA's regulations is required prior to replacing or substantially altering any approved air pollution control technology or device.
[Origin: WAC 173-400-114; ORCAA Rule 6.1.10 (local only)]
[Authority: WAC 173-401-600(1)(b)]

G13. Temporary Sources. The Permittee may operate portable air contaminant sources at temporary locations within the Facility subject to this permit provided the Permittee has complied with the requirements for temporary portable sources under ORCAA Rule 6.1.1.
[Origin: WAC 173-401-635; ORCAA 6.1.1 (local only)]
[Authority: WAC 173-401-600(1)(b)]

G14. Prevention of Significant Deterioration (PSD). A PSD permit application must be filed by the permittee and a PSD permit issued by Department of Ecology prior to the establishment of any new source in accordance with the cited regulations. No major stationary source or major modification as defined in the cited regulation shall begin actual construction without having received a PSD permit. Allowable emissions from the proposed major stationary source or major modification shall not cause or contribute to a violation of any ambient air quality standard. An applicant for a PSD permit must submit an application that provides complete information for Department of Ecology to determine compliance with all PSD program requirements. Detailed procedures for submitting a complete application, for public review and involvement, and for revisions to an existing PSD permit are provided in the cited regulations (WAC 173-400-700 through 750).
[Origin: WAC 173-400-117 (state only); WAC 173-400-700, -710, -720, -730, -740, -750 (state only)]
[Authority: WAC 173-401-600(1)(b)]

G15. Demolition and Asbestos Projects. The Permittee shall comply with all notification and approval requirements in Rule 6.3 of ORCAA Regulations prior to commencing any asbestos, renovation, or demolition project at the Facility as defined in ORCAA Rule 6.3.1. The Permittee shall conduct all renovation, demolition and asbestos projects in accordance with applicable asbestos control standards and requirements in ORCAA Rule 6.3.
[Origin: ORCAA Rule 6.3 (local only)]
[Authority: WAC 173-401-600(1)(b)]

G16. Demolition and Renovation Projects. The Permittee shall notify ORCAA prior to commencing any renovation or demolition activities at the Facility as defined in 40 CFR 61.141. The Permittee shall conduct all renovation, demolition and asbestos projects in accordance with applicable asbestos control standards and requirements in Subpart M of 40 CFR Part 61.
[Origin: 40 CFR Part 61, Subpart M]
[Authority: WAC 173-401-600(1)(a)]

G17. Protection of Stratospheric Ozone. The Permittee shall comply with the standards for recycling and emissions reduction as provided in 40 CFR Part 82, Subparts B and F.
[Origin: 40 CFR Part 82, Subparts B & F]
[Authority: WAC 173-401-600(1)(a)]

G18. Reasonably Available Control Technology (RACT):

a) General Standards for Maximum Emissions. All emissions units are required to use reasonably available control technology (RACT) which may be determined for some sources or source categories to be more stringent than the applicable emission limitations of any chapter of Title 173 WAC. *[Origin: WAC 173-400-040(1)(c) (state/local only)]*

b) General Standards for Maximum Particulate Matter. All emissions units are required to use reasonably available control technology (RACT) which may be determined for some sources or source categories to be more stringent than the applicable emission limitations of ORCAA Regulations. *[Origin: ORCAA Rule 8.3 (local only)]*

c) Emission standards and other requirements contained in rules or regulatory orders in effect at the time of this permit issuance shall be considered RACT for the purposes of issuing this permit. *[Origin: WAC 173-401-605(3)]*

[Origin: Listed by sub-condition]
[Authority: WAC 173-401-600(1)(b)]

G19. Outdoor Burning. The requirements under ORCAA Rule 6.2 and Chapter 173-425 WAC apply to all outdoor burning conducted at the Facility.
[Origin: Chapter 173-425 WAC; ORCAA Rule 6.2 (local only)]
[Authority: WAC 173-401-600(1)(b)]

G20. Wood Heating. Any wood combustion device used for space heating shall comply with the requirements in ORCAA Rule 8.1 and Chapter 173-433 WAC.
[Origin: Chapter 173-433 WAC; ORCAA Rule 8.1 (local only)]
[Authority: WAC 173-401-600(1)(b)]

G21. Burning Used Oil in Land Based Facilities. The Permittee may not burn used oil as fuel at the Facility unless:

a) The used oil meets the standards in ORCAA Rule 8.9. *[Origin: ORCAA Rule 8.9 (local only)]*

b) If burned in an emissions unit, the Permittee first secures approval of the fuel change according to Condition G11. *[Origin: ORCAA Rule 6.1 (local only)]*

[Origin: Listed by sub-condition]
[Authority: WAC 173-401-600(1)(b)]

G22. Gasoline Dispensing Facilities. Any gasoline dispensing facility located within the property boundary of the major source regulated by this AOP shall comply with the requirements in ORCAA Rule 8.12 and WAC 173-491-040.
[Origin: WAC 173-491-040 (state/local only); ORCAA Rule 8.12 (local only)]

[Authority: WAC 173-401-600(1)(b)]

[END OF SECTION]

VI. Prohibited Activities (PA)

PA1. Emissions Detrimental to Persons or Property Prohibited. No person shall cause or allow the 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.
[Origin: WAC 173-400-040(1)(a) (state/local only); WAC 173-400-040(6) (state/local only); ORCAA Rule 7.6 (local only)]
[Authority: WAC 173-401-600(1)(b)]

PA2. Unreasonable Odors Prohibited. No person shall cause or allow the emission or generation of any odor from any source, that unreasonably interferes with another person's use and enjoyment of their property.
[Origin: ORCAA Rule 8.5(c) (local only)]
[Authority: WAC 173-401-600(1)(b)]

PA3. Unreasonable Fallout Prohibited. No person shall cause or permit the emission of particulate matter from any source to be deposited beyond the property under direct control of the owner(s) or operator(s) of the source in sufficient quantity to interfere unreasonably with the use and enjoyment of the property upon which the material is deposited.
[Origin: WAC 173-400-040(1)(a); WAC 173-400-040(3); ORCAA Rule 8.3(e) (local only)]
[Authority: WAC 173-401-600(1)(b)]

PA4. Concealment and Masking Prohibited:

- **a)** No person shall cause or allow the installation or use of any device or use of any means, which conceals or masks an emission of air contaminant, which would otherwise violate any provisions of ORCAA's Regulations or chapter 173-400 WAC.
- **b)** No person shall cause or allow the installation or use of any device or use of any means designed to conceal or mask the emission of an air contaminant, which causes detriment to health, safety, or welfare of any person, or cause damage to property or business.
- **c)** Such concealment includes, but is not limited to:
  - **i)** The use of diluents to achieve compliance with a relevant standard based on the concentration of a pollutant in the effluent discharged to the atmosphere;
  - **ii)** The use of gaseous diluents to achieve compliance with a relevant standard for visible emissions.

[Origin: WAC 173-400-040(1)(a) (state/local only); WAC 173-400-040(8) (state/local only); ORCAA Rule 7.5 (local only)]
[Authority: WAC 173-401-600(1)(b)]

PA5. Circumvention Prohibited. Building, erecting, installing, or using any article, machine, equipment, or process to conceal an emission, that would otherwise constitute noncompliance with a relevant standard, is prohibited. Such concealment includes, but is not limited to:

- **a)** The use of diluents to achieve compliance with a relevant standard based on the concentration of a pollutant in the effluent discharged to the atmosphere; and,

b) The use of gaseous diluents to achieve compliance with a relevant standard for visible emissions.

[Origin: 40 CFR § 63.4(b)]
[Authority: WAC 173-401-600(1)(a)]

PA6. Fragmentation Prohibited. Fragmentation which divides ownership of an operation, within the same facility among various owners where there is no real change in control, will not affect applicability. The Permittee must not use fragmentation or phasing of reconstruction activities (i.e., intentionally dividing reconstruction into multiple parts for purposes of avoiding new source requirements) to avoid becoming subject to new source requirements.
[Origin: 40 CFR § 63.4(c)]
[Authority: WAC 173-401-600(1)(a)]

PA7. False or Misleading Statements Prohibited. No person shall willfully make a false or misleading statement to ORCAA as to any matter within the jurisdiction of ORCAA. No person shall make any false material statement, representation or certification in any form, notice or report required under chapter 70A.15 or 70.120 RCW, or any ordinance, resolution, regulation, permit or order in force pursuant thereto.
[Origin: WAC 173-400-105(6) (state/local only); ORCAA Rule 7.2 (local only)]
[Authority: WAC 173-401-600(1)(b)]

[END OF SECTION]

VII. Applicable Requirements

Plant-wide (PW) Applicable Requirements

Req #	Applicable Requirement Description (for information purposes only)	Monitoring
PW1	**Opacity Standard (State).** No person shall cause or allow the emission for more than three minutes, in any one hour, of an air contaminant from any emissions unit which at the emission point, or within a reasonable distance of the emission point, exceeds twenty percent opacity as determined by ecology method 9A. **Reference Test Method:** Ecology Method 9A *[Origin: WAC 173-400-040(1)(a) (state/local only); WAC 173-400-040 (2) (state/local only)]* *[Authority: WAC 173-401-600(1)(b)]*	M1 M2
PW2	**Opacity Standard (ORCAA).** a) In equipment or facilities, regardless of their date of installation, no person shall cause or allow the emission to the outdoor atmosphere, for more than three (3) minutes in any one hour, of a gas stream containing air contaminants which are greater than 20% opacity. b) Observations shall be made by trained and certified observers or by LIDAR instrumentation. *[Origin: ORCAA Rule 8.2 (local only)]* *[Authority: WAC 173-401-600(1)(b)]*	M1 M2
PW3	**Fugitive Emissions Control.** The owner or operator of any emission unit engaging in materials handling, construction, demolition or any other operation which is a source of fugitive emissions shall take reasonable precautions to prevent release of air contaminants from the operation. *[Origin: WAC 173-400-040(1)(a); WAC 173-400-040(4)(a)]* *[Authority: WAC 173-401-600(1)(b)]*	M4

Req #	Applicable Requirement Description (for information purposes only)	Monitoring
PW4	**Fugitive Dust Control.** The owner or operator of a source or activity, that generates fugitive dust, must take reasonable precautions to prevent fugitive dust from becoming airborne and must maintain and operate the source to minimize emissions. *[Origin: WAC 173-400-040(1)(a) (state/local only); WAC 173-400-040(9)(a) (state/local only); ORCAA Rule 8.3(c)-(d) (local only)]* *[Authority: WAC 173-401-600(1)(b)]*	M4
PW5	**Odor Control (State).** Any person who shall cause or allow the generation of any odor from any source or activity which may unreasonably interfere with any other property owner's use and enjoyment of her or his property must use recognized good practice and procedures to reduce these odors to a reasonable minimum. *[Origin: WAC 173-400-040(1)(a) (state/local only); WAC 173-400-040(5) (state/local only)]* *[Authority: WAC 173-401-600(1)(b)]*	M3 M4
PW6	**Odor Control (ORCAA).** Reasonably available control technology (RACT) shall be installed and operated to mitigate odor-bearing gases emitted into the atmosphere to a minimum, or, so as not to create air pollution. *[Origin: ORCAA Rule 8.5(a) (local only)]* *[Authority: WAC 173-401-600(1)(b)]*	M3 M4
PW7	**Sulfur Dioxide.** No person shall cause or allow the emission of a gas containing sulfur dioxide from any emissions unit in excess of one thousand ppm of sulfur dioxide on a dry basis, corrected to seven percent oxygen for combustion sources, and based on the average of any period of sixty consecutive minutes. **Reference Test Method:** 40 CFR Part 60 Appendix A. *[Origin: WAC 173-400-040(1)(a); WAC 173-400-040(7)]* *[Authority: WAC 173-401-600(1)(b); WAC 173-401-605(1)]*	M5
PW8	**General Particulate Standards for Combustion Units (State).** No person shall cause or allow emissions of particulate matter in excess of 0.23 gram per dry cubic meter at standard conditions (0.1 grain/dscf). No person shall allow the emission of particulate matter in excess of 0.46 gram per dry cubic meter at standard	M1 M2 M6

Req #	Applicable Requirement Description (for information purposes only)	Monitoring
	conditions (0.2 grain/dscf), as measured by 40 CFR Part 60, Appendix A, Test Method 5 (in effect on the date in WAC 173-400-025) or approved procedures in Source Test Manual - Procedures for Compliance Testing, state of Washington, department of ecology, as of September 20, 2004, on file at ecology. **Reference Test Method:** 40 CFR Part 60, Appendix A, Test Method 5 (in effect on the date in WAC 173-400-025) or approved procedures in Source Test Manual - Procedures for Compliance Testing, state of Washington, department of ecology, as of September 20, 2004, on file at ecology. *[Origin: WAC 173-400-050(1) (state/local only)]* *[Authority: WAC 173-401-600(1)(b); WAC 173-401-605(1)]*	
PW9	**ORCAA Particulate Standards.** No person shall cause or allow the emission of particulate matter to the outdoor atmosphere from any single source in excess of 0.10 grains per standard cubic foot of gas (calculated at 7% oxygen). Particulate test procedures, on file at the Authority, will be used to determine compliance. The Authority includes the Method 5 back-half condensable particulate matter for determining compliance with particulate matter standards. **Reference Test Methods:** Particulate test procedures, on file at the Authority, will be used to determine compliance. The Authority includes the Method 5 (EPA Reference Method 5 from 40 CFR Part 60, Appendix A) back-half condensable particulate matter for determining compliance with particulate matter standards. *[Origin: ORCAA Rule 8.3(a)&(b) (local only)]* *[Authority: WAC 173-401-600(1)(b); WAC 173-401-605(1)]*	M1 M2 M6
PW10	**Particulate Standards for Process Units.** No person shall cause or allow the emission of particulate material from any general process operation in excess of 0.23 grams per dry cubic meter at standard conditions (0.1 grain/dscf) of exhaust gas. **Reference Test Methods:** Test methods from 40 CFR Parts 51, 60, 61, or 63 (in effect on the date in WAC 173-400-025) and any other approved test procedures in ecology's "Source Test Manual - Procedures For Compliance Testing" as of September 20, 2004, must be used to determine compliance.	M1 M2 M6

Req #	Applicable Requirement Description (for information purposes only)	Monitoring
	[Origin: WAC 173-400-040(1)(a); WAC 173-400-060 (state/local only)] *[Authority: WAC 173-401-600(1)(b); WAC 173-401-605(1)]*	
PW11	**Maintenance and Repair of Air Pollution Control Equipment and Processes**. All air contaminant sources are required to keep any process and air pollution control equipment in good operating condition and repair. *[Origin: ORCAA Rule 8.8 (local only)]* *[Authority: WAC 173-401-600(1)(b)]*	M7
PW12	**Facility-wide VOC Emission Limit.** Plant-wide emissions of VOC shall not exceed 40 tons per consecutive 12-month period. *[Origin: WAC 173-400-091; NOC# 09MOD701 Condition 2]* *[Authority: WAC 173-401-600(1)(c)]*	M8

EU1, EU2, EU4, EU6 and EU7 Lamination (AR1) Applicable Requirements

Req #	Applicable Requirement Description (for information purposes only)	Monitoring
Applicable Requirements for EU1, EU2, EU4, EU6, and EU7 (Applies to Lamination Only)		
AR1.1a	**Subpart VVVV Open Molding Emission Limit.** Organic HAP emissions from production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat operations shall be limited to the emission limit determined by Equation 1 of 40 CFR § 63.5698 (shown below), based on a 12-month rolling average. This standard applies at all times. Equation 1 of 40 CFR § 63.5698 $HAP\ Limit = [46(M_R) + 159(M_{PG}) + 291(M_{CG}) + 54(M_{TR}) + 214(M_{TG})]$ Where: HAP Limit = total allowable organic HAP that can be emitted from open molding operations, kilograms. M_R= mass of production resin used in the past 12 months, excluding any materials exempt under (a)-(c) below, in megagrams.	M14 M15

	M_{PG}= mass of pigmented gel coat used in the past 12 months, excluding any materials exempt under (a)-(c) below, in megagrams. M_{CG}= mass of clear gel coat used in the past 12 months, excluding any materials exempt under (a)-(c) below, in megagrams. M_{TR}= mass of tooling resin used in the past 12 months, excluding any materials exempt under (a)-(c) below, in megagrams. M_{TG}= mass of tooling gel used in the past 12 months, excluding any materials exempt under (a)-(c) below, in megagrams. Operations listed below are exempt from this limit: a) Production resins (including skin coat resins) that must meet specifications for use in military vessels or must be approved by the U.S. Coast Guard for use in the construction of lifeboats, rescue boats, and other life-saving appliances approved under 46 CFR subchapter Q or the construction of small passenger vessels regulated by 46 CFR subchapter T. Production resins for which this exemption is used must be applied with nonatomizing (non-spray) resin application equipment. b) Pigmented, clear, and tooling gel coat used for part of mold repair and touch up. The total gel coat materials included in this exemption must not exceed 1 percent by weight of all gel coat used at the facility on a 12-month rolling-average basis. c) Pure, 100 percent vinylester resin used for skin coats. This exemption does not apply to blends of vinylester and polyester resins used for skin coats. The total resin materials included in the exemption cannot exceed 5 percent by weight of all resin used at the facility on a 12-month rolling-average basis. *[Origin: 40 CFR § 63.5698(a); 40 CFR § 63.5698(b); 40 CFR § 63.5698(d)]* *[Authority: WAC 173-401-600(1)(a)]*	
AR1.1b	**Subpart VVVV Standards for Resin and Gel Coat Mixing Operations.** 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, must have a cover with no visible gaps in place at all times. This requirement does not apply when material is being manually	M4

	added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container. This standard applies at all times. *[Origin: 40 CFR § 63.5731(a); 40 CFR § 63.5731(b)]* *[Authority: WAC 173-401-600(1)(a)]*	
AR1.1c	**Subpart VVVV Organic HAP Limit for Resin and Gel Coat Application Equipment Cleaning Operations.** For routine flushing of resin and gel coat application equipment (e.g., spray guns, flowcoaters, brushers, rollers, and squeegees), the Permittee shall use a cleaning solvent that contains no more than 5 percent organic HAP by weight. This organic HAP content limit does not apply to removing cured resin or gel coat from application equipment. Cured resin or gel coat means resin or gel coat that has changed from a liquid to a solid. This standard applies at all times. *[Origin: 40 CFR § 63.5734(a)]* *[Authority: WAC 173-401-600(1)(a)]*	M16
AR1.1d	**Subpart VVVV Solvent Storage for Resin and Gel Coat Application Equipment Cleaning Operations.** The Permittee must store organic HAP-containing solvents used for removing cured resin or gel coat in containers with covers. The covers must have no visible gaps and must 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 gallons), the distance from the top of the container to the solvent surface must be at least 0.75 times the diameter of the container. Cured resin or gel coat means resin or gel coat that has changed form a liquid to a solid. This standard applies at all times. *[Origin: 40 CFR § 63.5734(b)]* *[Authority: WAC 173-401-600(1)(a)]*	M4
AR1.1e	**Subpart VVVV Carpet and Fabric Adhesive Operations Organic HAP limit.** The Permittee shall use carpet and fabric adhesives that contain no more than 5 percent organic HAP content by weight. This standard applies at all times. *[Origin: 40 CFR § 63.5740(a)]*	M17

	[Authority: WAC 173-401-600(1)(a)]	
AR1.1f	**Application Methods Audit Plan.** An Application Methods Audit Plan shall be updated as needed to include procedures for determining the percent breakdown of methods used (spray, impregnator, flow coater, etc.) for purposes of calculating actual VOC emissions. Whenever updated, the plan shall be submitted to ORCAA for review. *[Origin: NOC# 09MOD701 Condition 5]* *[Authority: WAC 173-401-600(1)(c)]*	None: Recordkeeping Only. RK12
Applicable Requirements for EU1 And EU4 (Bldg 9 and 4)		
AR1.2a	**Operation Plan.** The facility Operations and Maintenance (O&M) plan shall include procedures specific to the operations of the ventilation system in Building 9, and the ventilation system in Building 4. *[Origin: NOC# 07NOC554 Condition 5]* *[Authority: WAC 173-401-600(1)(c)]*	None: Recordkeeping Only. RK11
Applicable Requirements for EU2 (Bldg 2 Mixing Booth)		
AR1.3a	**Stack Specifications.** There shall be no flow obstructions at the point of discharge from the stack (i.e. cap). However, a weatherproof stack exhaust configuration that does not obstruct the air flow as it exits the stack is acceptable. *[Origin: NOC# 08NOC630 Condition 2]* *[Authority: WAC 173-401-600(1)(c)]*	None.
AR1.3b	**Operation Plan.** The facility Operations and Maintenance (O&M) plan shall include procedures specific to operation of Building 2 Mixing Booth. *[Origin: NOC# 08NOC630 Condition 3]* *[Authority: WAC 173-401-600(1)(c)]*	None: Recordkeeping Only. RK11
Applicable Requirements for EU7-Lamination Only (Bldg 7 Annex – Bay Seven)		
AR1.4a	**Operations and Maintenance Plan.** The Permittee shall implement and update when necessary an Operations and Maintenance (O&M) plan for assuring good operating condition and repair of ventilation systems and control devices. The plan shall include procedures for	None: Recordkeeping Only. RK11

	regular inspection and maintenance of all ventilation system and control devices used including filter and dust control systems. *[Origin: NOC# 04NOC351 Condition 2]* *[Authority: WAC 173-401-600(1)(c)]*	
AR1.4b	**Fugitive Emissions.** All reasonable measures and precautions shall be taken for minimizing fugitive emissions including but not limited to: a) Keeping VOC-containing material in closed containers when not being used; b) Minimizing and promptly cleaning up all VOC materials spills and leaks; c) Keeping all doors closed during operation except when actively loading or unloading materials or products, etc.; and, d) Conducting spray coating, lamination, and other coating operations in approved areas of the facility. *[Origin: NOC# 04NOC351 Condition 3]* *[Authority: WAC 173-401-600(1)(c)]*	M4

EU3, EU5, EU6 and EU7 Coating Operation (AR2) Applicable Requirements

Req #	Applicable Requirement Description (for information purposes only)	Monitoring
Subpart II Applicable Requirements for EU3, EU5,EU6 and EU7 (Buildings 2, 5, 7, and Bay Seven-Applies to Ship Coatings Only)		
AR2.1a	**Subpart II Ship Coating Applicability.** Conditions AR2.1b – AR2.1f applies to all coatings applied to ships (as defined in 40 CFR § 63. 782), except for those coatings listed below: a) "Low-usage exempt" coatings: Coatings used in volumes less than 52.8 gallons per any consecutive 12-month period, provided that the total volume of exempt coatings does not exceed 264 gallons per any consecutive 12-month period. All coatings claimed under this exemption shall be clearly labeled as "low-usage exempt" and the volume of each such coating shall be maintained in the facility's records, as required by Condition RK15. b) Coatings applied with hand-held, nonrefillable, aerosol containers or to unsaturated polyester resin (i.e., fiberglass lay-up).	M12

Req #	Applicable Requirement Description (for information purposes only)	Monitoring
	[Origin: 40 CFR § 63.781(b)] *[Authority: WAC 173-401-600(1)(a)]*	
AR2.1b	**Subpart II Implementation Plan.** The Permittee shall have a written implementation plan that addresses the following: a) Compliance procedure(s) under 40 CFR § 63.785(c) that the Permittee intends to use for demonstrating compliance with coating VOHAP limits in Condition AR2.1c. b) Procedures for maintaining the records required under Condition RK15 and Condition RK16, including the procedures for gathering the necessary data and making the necessary calculations; and, c) Procedures for ensuring compliance with Conditions AR2.1d-AR2.1f. *[Origin: 40 CFR § 63.787(b)]* *[Authority: WAC 173-401-600(1)(a)]*	None: Recordkeeping Only. RK15
AR2.1c	**Subpart II VOHAP Limit.** The Permittee shall not cause or allow the application of any coating to a ship with an as-applied VOHAP content exceeding the applicable limit given in Table 2 of Subpart II, as determined by the procedures described in 40 CFR § 63.785(c)(1) through (c)(4) which are included in condition M13. You must demonstrate continuous compliance with the emissions standards and operating limits by using the performance test methods and procedures in 40 CFR § 63.786, which are included in condition M13. **Reference Method:** Method 24 or the test methods and procedures in 40 CFR § 63.786. *[Origin: 40 CFR § 63.783(a); 40 CFR § 63.785(e); 40 CFR § 63.786(a)]* *[Authority: WAC 173-401-600(1)(a)]*	M13
AR2.1d	**Subpart II Operation & Maintenance.** The Permittee must operate and maintain ship surface coating operations in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance	M4 M7

Req #	Applicable Requirement Description (for information purposes only)	Monitoring
	procedures are being used will be based on information available to ORCAA staff which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. *[Origin: 40 CFR § 63.783(b)(1)]* *[Authority: WAC 173-401-600(1)(a)]*	
AR2.1e	**Subpart II Handling & Transferring.** The Permittee shall ensure that all handling and transfer of VOHAP-containing materials to and from containers, tanks, vats, drums, and piping systems is conducted in a manner that minimizes spills. *[Origin: 40 CFR § 63.783(b)(2)]* *[Authority: WAC 173-401-600(1)(a)]*	M4
AR2.1f	**Subpart II Fugitives.** All containers, tanks, vats, drums, and piping systems for use with VOHAP-containing materials must be free of cracks, holes, and other defects and remain closed unless materials are being added to or removed from them. *[Origin: 40 CFR § 63.783(b)(3)]* *[Authority: WAC 173-401-600(1)(a)]*	M4
Applicable Requirements Specific to EU3 (Building 2 Prep and Paint Booths)		
AR2.2a	**Stack Specifications.** There shall be no flow obstructions at the point of discharge from the stack (i.e. cap). However, a weatherproof stack exhaust configuration that does not obstruct the air flow as it exits the stack is acceptable. *[Origin: NOC# 08NOC598 Condition 2]* *[Authority: WAC 173-401-600(1)(c)]*	None.
AR2.2b	**Filters.** Exhaust air from Building 2 Spray Booth 1 and 2 shall be adequately filtered to remove particulate overspray. Filters shall be monitored on a regular basis and shall be replaced whenever damaged or loaded with particulate build-up to an extent that jeopardizes the	M7

Req #	Applicable Requirement Description (for information purposes only)	Monitoring
	effectiveness of the spray booth in capturing and controlling the emissions. All filters shall be properly seated and shall cover all openings of the exhaust plenum of the spray booth. *[Origin: NOC# 08NOC598 Condition 3]* *[Authority: WAC 173-401-600(1)(c)]*	
AR2.2c	**Opacity Limit.** Building 2 Spray Booth 1 and 2 emissions shall not exceed 5% opacity. **Reference Method:** EPA 40 CFR Part 60 Appendix A Method 9 *[Origin: NOC# 08NOC598 Condition 4]* *[Authority: WAC 173-401-600(1)(c)]*	M1 M2
AR2.2d	**Operation Plan.** The facility Operations and Maintenance (O&M) shall include procedures specific to operation of Building 2 Spray Booth 1 and 2 and Building 2 Prep Booth 1 and 2. At a minimum the procedures shall include: a) Procedures for inspecting the filters; and, b) A schedule for inspecting the filters. *[Origin: NOC# 08NOC598 Condition 5]* *[Authority: WAC 173-401-600(1)(c)]*	None: Recordkeeping Only. RK11
Applicable Requirements Specific to EU5 (Building 5 Spray Room)		
AR2.3a	**Filter Exhaust.** Air shall be filtered prior to exhausting to the atmosphere. Filters shall be suitable for capture or knockout of overspray. Building exhaust shall be conducted through a vertical stack with a vertical discharge to the atmosphere at least six feet above the peak roof line. There shall be no flow obstructions at the point of discharge from the stack (i.e. cap). However, a butterfly valve which does not obstruct the exhaust as it exits the stack is acceptable. *[Origin: NOC# 657 Condition 3]* *[Authority: WAC 173-401-600(1)(c)]*	M7

Req #	Applicable Requirement Description (for information purposes only)	Monitoring
AR2.3b	**Operation and Maintenance.** An Operation and Maintenance (O&M) plan for purposes of maintaining equipment, attending to the prompt repair of any defective equipment and record-keeping shall be devised and kept on site. The O&M plan shall include, but shall not be limited to, the following measures: a) Daily filter check to assure filters are clean, properly seated, and cover all openings; b) Reasonable measures and precautions for minimizing volatile emissions in the building; c) Cleaning and maintaining the stack and fan blades. d) Standard procedures for responding to odor and fallout complaints including notifying ORCAA of these occurrences. *[Origin: NOC# 657 Condition 4]* *[Authority: WAC 173-401-600(1)(c)]*	None: Recordkeeping Only. RK11
Applicable Requirements for EU7-Coating Only (Bldg 7 Annex – Bay Seven)		
AR2.4a	**Operations and Maintenance Plan.** The Permittee shall implement and update when necessary an Operations and Maintenance (O&M) plan for assuring good operating condition and repair of ventilation systems and control devices. The plan shall include procedures for regular inspection and maintenance of all ventilation system and control devices used including filter and dust control systems. *[Origin: NOC# 04NOC351 Condition 2]* *[Authority: WAC 173-401-600(1)(c)]*	M7
AR2.4b	**Fugitive Emissions.** All reasonable measures and precautions shall be taken for minimizing fugitive emissions including but not limited to: a) Keeping VOC-containing material in closed containers when not being used; b) Minimizing and promptly cleaning up all VOC materials spills and leaks; c) Keeping all doors closed during operation except when actively loading or unloading materials or products, etc.; and, d) Conducting spray coating, lamination, and other coating operations in approved areas of the facility.	M4

Req #	Applicable Requirement Description (for information purposes only)	Monitoring
	[Origin: NOC# 04NOC351 Condition 3] *[Authority: WAC 173-401-600(1)(c)]*	

EU8 (AR3) Applicable Requirements (Building 7 Annex – Metal Working)

Req #	Applicable Requirement Description (for information purposes only)	Monitoring
AR3.1a	**Operation Plan.** The facility Operations and Maintenance (O&M) plan shall include procedures specific to operation of the Building 7 Annex welding emission control baghouse. *[Origin: NOC# 08NOC638 Condition 2]* *[Authority: WAC 173-401-600(1)(c)]*	None: Recordkeeping Only. RK11
AR3.1b	**Operations and Maintenance Plan.** The Permittee shall implement and update when necessary an Operations and Maintenance (O&M) plan for assuring good operating condition and repair of ventilation systems. The plan shall include procedures for regular inspection and maintenance of all ventilation systems used including filter and dust control systems. *[Origin: NOC# 04NOC351 Condition 2]* *[Authority: WAC 173-401-600(1)(c)]*	M7
AR3.1c	**Fugitive Emissions.** All reasonable measures and precautions shall be taken for minimizing fugitive emissions including but not limited to keeping all doors closed during operation except when actively loading or unloading materials or product, etc. *[Origin: NOC# 04NOC351 Condition 3]* *[Authority: WAC 173-401-600(1)(c)]*	M4

EU9 (AR4) Applicable Requirements (Building 7 Annex – Carpentry Shop)

Req #	Applicable Requirement Description (for information purposes only)	Monitoring

AR4.1a	**Baghouse Emission Limit.** Visible emissions from the Building 7 Baghouse shall not exceed 10% opacity for a period or periods aggregating more than 3 minutes in any 1 hour, as determined by the Washington Department of Ecology Method 9A. **Reference Method:** Ecology Method 9A *[Origin: NOC# 08NOC620 Condition 2]* *[Authority: WAC 173-401-600(1)(c)]*	M1 M2
AR4.1b	**Baghouse Operation and Maintenance Plan.** The Permittee shall maintain written procedures in an Operation and Maintenance (O&M) plan that provide instructions for inspection, maintenance, and repair of the Building 7 Baghouse. The compliance assurance plan shall contain, but not be limited to, the following: a) A schedule for inspecting the Building 7 Baghouse; b) Procedures for inspecting the Building 7 Baghouse; and, c) Standard log for recording inspections and repairs of the Building 7 Baghouse. *[Origin: NOC# 08NOC620 Condition 3]* *[Authority: WAC 173-401-600(1)(c)]*	None: Recordkeeping Only. RK11
AR4.1c	**Operations and Maintenance Plan.** The Permittee shall implement and update when necessary an Operations and Maintenance (O&M) plan for assuring good operating condition and repair of ventilation systems. The plan shall include procedures for regular inspection and maintenance of all ventilation systems used including filter and dust control systems. *[Origin: NOC# 04NOC351 Condition 2]* *[Authority: WAC 173-401-600(1)(c)]*	M7
AR4.1d	**Fugitive Emissions.** All reasonable measures and precautions shall be taken for minimizing fugitive emissions including but not limited to keeping all doors closed during operation except when actively loading or unloading materials or product, etc. *[Origin: NOC# 04NOC351 Condition 3]* *[Authority: WAC 173-401-600(1)(c)]*	M4

EU10 (AR5) Applicable Requirements (Building 7 Annex-Cabinet Shop)

<table>
<tr><th>Req #</th><th>Applicable Requirement Description (for information purposes only)</th><th>Monitoring</th></tr>
<tr><td>AR5.1a</td><td>Material Use Limits. The Permittee shall limit the amount of materials used, applied, or disposed of at the facility to the following amounts per 12-consecutive month period:

<table>
<tr><th>Material</th><th>Gallons</th></tr>
<tr><td>Eurocryl “U” “NY” (Antoni Code 578-0500)</td><td>850</td></tr>
<tr><td>Eurothane Clear (Antoni Code 570-0000)</td><td>600</td></tr>
<tr><td>Reducer (Antoni Code SOL-4007)</td><td>412</td></tr>
<tr><td>West System Epoxy (Product Code 105)</td><td>375</td></tr>
<tr><td>West System Hardener (Product Code 205)</td><td>80</td></tr>
</table>

[Origin: NOC# 06NOC462 Condition 2, 3, 4, 5, and 6]
[Authority: WAC 173-401-600(1)(c)]</td><td>M10</td></tr>
<tr><td>AR5.1b</td><td>Operations and Maintenance: The Permittee shall implement and update when necessary, an Operations and Maintenance (O&M) plan for the Building #7 Cabinet Shop assuring good operating conditions and for repair of air pollution control devices. The plan shall at a minimum include the following:
a) Keeping VOC containing material in closed containers when not being used;
b) Storing all solvents or solvent containing cloth or other material in closed air-tight containers;
c) Minimizing and promptly cleaning up all VOC materials spills and leaks;
d) Conducting spray-coating operations only in approved spray areas, except for minor touch-up work; and,
e) Procedures for operating and maintaining the dust collection system.

[Origin: NOC# 06NOC462 Condition 9]
[Authority: WAC 173-401-600(1)(c)]</td><td>M4
M7</td></tr>
<tr><td>AR5.1c</td><td>Incidental Furniture Manufacturer Criteria. The Permittee shall not be subject to the provisions of 40 CFR Part 63 Subpart JJ provided:</td><td>M11</td></tr>
</table>

	a) The Permittee is primarily engaged in the manufacture of products other than wood furniture; and, b) Uses no more than 100 gallons per month of finishing materials or adhesives in the manufacture of wood furniture or wood furniture components. *[Origin: 40 CFR § 63.800(a); 40 CFR § 63.801(a)]* *[Authority: WAC 173-401-600(1)(a)]*	

EU11, EU12, and EU13 (AR6) Emergency Engine Requirements

Req #	Applicable Requirement Description (for information purposes only)	Monitoring
Applicable Requirements for EU11, EU12, and EU13		
AR6.1a	**Maintenance and Repair.** All air contaminant sources are required to keep any process and/or air pollution control equipment in good operating condition and repair. Maintaining the emergency engines in good operating condition and repair shall include, but is not limited to: a) Change oil and filter every 500 hours of operation or annually, whichever comes first. b) Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary. c) Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary. If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the management practice requirements or if performing the management practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the management practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The management practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk has abated. *[Origin (EU11 and EU12): ORCAA Rule 8.8 (local only)]* *[Authority (EU11 and EU12): WAC 173-401-605(1)]*	M18

Req #	Applicable Requirement Description (for information purposes only)	Monitoring
	[Origin (EU13): 40 CFR § 63.6602; 40 CFR § 63.6605; 40 CFR Part 63 Subpart ZZZZ Table 2c, Item 1a, Item 1b, and Item 1c; 40 CFR Part 63 Subpart ZZZZ Table 2c, Item 1 Footnote 1] *[Authority (EU13): WAC 173-401-600(1)(a)]*	
AR6.1b	**Subpart ZZZZ Operating Limitations.** Any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in a) and b) below, is prohibited. There is no time limit on the use of emergency stationary RICE in emergency situations. a) You may operate your emergency stationary RICE for a maximum of 100 hours per calendar year for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. b) The emergency stationary RICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing. *[Origin (EU11): 40 CFR § 63.6590(b)(1)(i); 40 CFR § 63.6675; 40 CFR § 63.6640(f)]* *[Origin (EU12): 40 CFR § 63.6590(b)(3)(iii); 40 CFR § 63.6675; 40 CFR § 63.6640(f)]* *[Origin (EU13): 40 CFR § 63.6605; 40 CFR § 63.6640(f)]* *[Authority (EU11 & EU12): WAC 173-401-605(1)]* *[Authority (EU13): WAC 173-401-600(1)(a)]*	M18
Applicable Requirements Specific to EU11 (Building 9 Emergency Engine)		
AR6.2a	**Diesel Engine Operating Limit.** The Permittee shall limit the total annual hours of operation of EU11 to less than 500 hours. *[Origin: NOC# 07NOC554 Condition 2]* *[Authority: WAC 173-401-600(1)(c)]*	M18

Req #	Applicable Requirement Description (for information purposes only)	Monitoring
AR6.2b	**Fuel Sulfur Limit.** EU11 shall combust only diesel fuel qualifying as ultra-low diesel (less than 15 ppm sulfur). Demonstration of compliance with this condition shall be based on fuel purchase receipts, as outlined in Condition RK24. *[Origin: NOC# 07NOC554 Condition 3]* *[Authority: WAC 173-401-600(1)(c)]*	M5
AR6.2c	**BACT Opacity Limit.** Visible emissions from EU11 shall not exceed 10% opacity as measured in accordance with EPA 40 CFR Part 60 Appendix A Method 9. This limit does not apply during period of cold start-up. For the purpose of compliance with this condition, cold start-up shall be defined as the period of time beginning when the engine is started and ending when the temperature of the engine coolant reaches 65.5 °C (150 °F). **Reference Method:** EPA Method 9 *[Origin: NOC# 07NOC554 Condition 4]* *[Authority: WAC 173-401-600(1)(c)]*	M1 M2
AR6.2d	**Operation Plan.** The Permittee shall update the facility Operations and Maintenance (O&M) plan to include procedures specific to operation of the Caterpillar C15 diesel engine. *[Origin: NOC# 07NOC554 Condition 5]* *[Authority: WAC 173-401-600(1)(c)]*	None: Recordkeeping Only. RK11
Applicable Requirements Specific to EU13 (Building 5 Emergency Engine)		
AR6.3a	**Subpart ZZZZ Operation and Maintenance Requirements.** At all times you must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.	M1 M2

Req #	Applicable Requirement Description (for information purposes only)	Monitoring
	[Origin: 40 CFR § 63.6605(b)] *[Authority: WAC 173-401-600(1)(a)]*	
AR6.3b	**Subpart ZZZZ Maintenance Plan.** You must operate and maintain the stationary RICE according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. *[Origin: 40 CFR § 63.6625(e)(2)]* *[Authority: WAC 173-401-600(1)(a)]*	None: Recordkeeping Only. RK23
AR6.3c	**Subpart ZZZZ Equipment Requirement.** You must install a non-resettable hour meter if one is not already installed. *[Origin: 40 CFR § 63.6625(f)]* *[Authority: WAC 173-401-600(1)(a)]*	None.
AR6.3d	**Subpart ZZZZ Startup Requirements.** During periods of startup you must minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. *[Origin: 40 CFR § 63.6602; 40 CFR § 63.6605; 40 CFR § 63.6625(h); 40 CFR Part 63 Subpart ZZZZ Table 2c, Item 1]* *[Authority: WAC 173-401-600(1)(a)]*	None: Recordkeeping Only. RK22

EU14 (AR7) Applicable Requirements (Metal Etching/Evaporator)

Req #	Applicable Requirement Description (for information purposes only)	Monitoring
AR7.1a	**Operation and Maintenance Plan.** The Permittee shall have an Operations and Maintenance (O&M) plan for the powder coating preparation process (including the evaporator) to assure continuous compliance with applicable air regulations and standards. The plan shall be	M1 M2 M19

	updated when necessary and kept in a manual on site and be made available to all powder coating process operators. At a minimum, the O&M plan shall include the following: a) Procedures for operation and maintenance of the metal cleaning and etching process including procedures for minimizing fugitive emissions; b) Procedures to ensure that the evaporator is operated, maintained and repaired consistent with the manufacturer's specifications; and c) Procedures for monitoring pH of the neutralization tank. **Reference Method:** Ecology Method 9A *[Origin: NOC# 13NOC978 Condition 2]* *[Authority: WAC 173-401-600(1)(c)]*	

EU15 & EU16 (AR8) Applicable Requirements (Boilers)

Req #	Applicable Requirement Description (for information purposes only)	Monitoring
AR8.1a	**Subpart DDDDD Boiler Tune-Up.** EU15 and EU16 must complete a tune-up every 5 years as specified in below: a) As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may perform the burner inspection any time prior to the tune-up or delay the burner inspection until the next scheduled unit shutdown). At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment; b) Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available; c) Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown);	None: Recordkeeping Only. RK1 RK14

	d) Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO_X requirement to which the unit is subject; e) Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer; and f) Maintain on-site and submit, if requested by ORCAA staff, a report containing the following information: i) The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler or process heater; ii) A description of any corrective actions taken as a part of the tune-up; and iii) The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit. Each 5-year tune-up must be conducted no more than 61 months after the previous tune-up. You may delay the burner inspection specified in paragraph (a) until the next scheduled or unscheduled unit shutdown, but you must inspect each burner at least once every 72 months. If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup. *[Origin: 40 CFR § 63.7500(e); 40 CFR § 63.7505(a); 40 CFR § 63.7515(d); 40 CFR § 63.7540(a)(12); 40 CFR § 63.7540(a)(13); 40 CFR Part 63 Subpart DDDDD Table 3, Item 1] [Authority: WAC 173-401-600(1)(a)]*	

[END OF SECTION]

VIII. Monitoring Terms and Conditions (M)

Plant-wide Monitoring

The following monitoring requirements apply plant-wide.

M1. Opacity Surveys. The Permittee shall conduct visual opacity surveys of the facility during daylight hours at least monthly.

- **a)** Surveys shall be conducted from locations with a clear view of the facility and where the sun is not directly in the observer's eyes. Survey locations shall be at least 15 feet but not more than 0.25 miles from the Facility.
- **b)** Surveys shall be conducted while the facility is operating.
- **c)** Observer certification for plume evaluation is not required to conduct the survey. However, it is necessary that the observer is educated on the general procedures for determining the presence of visible emissions. As a minimum, the observer must be trained and knowledgeable regarding the effects on the visibility of emissions caused by background contrast, position of the sun and amount of ambient lighting, observer position relative to source and sun, and the presence of uncombined water.
- **d)** The survey shall consist of a visual scan of the facility and direct observation of all stacks to identify any visible emissions excluding water vapors.
- **e)** Each stack shall be observed for a total of at least 15 seconds during the survey.
- **f)** Any visible emissions other than uncombined water shall be recorded as a positive reading associated with the emission point or stack.
- **g)** If it is not possible to conduct the survey due to inclement weather conditions, the Permittee shall make three attempts during the day to conduct the survey. All attempts to conduct the survey shall be recorded in accordance with Condition RK3.

[Origin: N/A]
[Authority: WAC 173-401-615(1)(b)]

M2. Opacity Compliance Demonstration Required. When required by ORCAA, or when point or fugitive emissions are observed during monthly surveys (Condition M1), other than visible emissions due to uncombined water, the Permittee shall:

- **a)** Take corrective action, which may include shutting down the activity or unit until appropriate repairs can be made. When corrections cannot be made within 24 hours, the Permittee shall determine the opacity using the applicable reference test method listed in Section VII:

i) Opacity readings shall be initiated as soon as possible, but not later than one hour after the requirement to verify compliance is triggered unless the subject emission unit is not operating, or lack of daylight or weather conditions prevent conducting the reading.

ii) Certified readers conducting opacity readings in accordance with Ecology Method 9A may elect to discontinue reading after 6 minutes if all of the opacity readings are below the applicable opacity limit.

b) For fugitive emissions causing opacity, determine and document that reasonable and/or appropriate precautions are being taken to prevent the fugitive emissions. The determination shall be completed within 24 hours of the opacity survey.

[Origin: N/A]
[Authority: WAC 173-401-615(1)(b)]

M3. Complaint Monitoring. The Permittee shall monitor all air quality related complaints directed to the Facility when operating as follows:

a) The Permittee shall provide an automatic phone recording system or an onsite contact person available to the general public for filing a complaint whenever the Facility is operating.

b) The Permittee shall monitor complaints received in a timely manner by investigating and assessing the validity of each complaint and documenting the complaint in accordance with Condition RK8.

[Origin: NOC# 657 Condition 4 (EU5); NOC# 09MOD701 Condition 1]
[Authority: WAC 173-401-615(1)(b)]

M4. Fugitive Emissions, Odors and Dust Control Monitoring. The Permittee shall monitor operations to assess whether reasonable and appropriate precautions for preventing fugitive emissions, including odors, and fugitive dust are practiced throughout the facility. Monitoring shall consist of a monthly audit of facility-wide operations with the potential for fugitive emissions, odors or dust. The audit shall cover, but shall not be limited to, the reasonable and appropriate practices identified in Table M1.

TABLE M1: Monitoring Reasonable and Appropriate Precautions for Preventing Fugitive Emissions and Dust

Reasonable and Appropriate Precaution	Origin and Authority
1. Visually inspect and ensure that all mixing containers subject to AR1.1b have covers with no visible gaps between the cover and the container, or between the cover and the equipment passing through the cover.	*[Origin: 40 CFR § 63.5731(c)]* *[Authority: WAC 173-401-600(1)(a)]*

2. Visually inspect and ensure that any containers holding organic-HAP containing solvents used for removing cured resin and gel coat have covers with no visible gaps.	*[Origin: 40 CFR § 63.5737(c)]* *[Authority: WAC 173-401-600(1)(a)]*
3. Keep VOC-containing material in closed containers when not being used.	*[Origin: N/A]* *[Authority: WAC 173-401-615(1)(b)]*
4. Store all solvents or solvent containing cloth or other material in closed air-tight containers.	*[Origin: N/A]* *[Authority: WAC 173-401-615(1)(b)]*
5. Minimize and promptly clean up all VOC materials spills and leaks.	*[Origin: N/A]* *[Authority: WAC 173-401-615(1)(b)]*
6. Keep all doors closed during operation except when actively loading or unloading materials or product, etc.	*[Origin: N/A]* *[Authority: WAC 173-401-615(1)(b)]*
7. Conduct spray coating, lamination, and other coating operations in approved areas of the facility.	*[Origin: N/A]* *[Authority: WAC 173-401-615(1)(b)]*
8. All handling and transfer of VOHAP-containing materials to and from containers, tanks, vats, drums and piping systems is conducted in a manner that minimizes spills.	*[Origin: N/A]* *[Authority: WAC 173-401-615(1)(b)]*
9. Containers, tanks, vats, drums, and piping systems for use with VOHAP-containing materials are free of cracks, holes, and other defects and remain closed unless materials are being added to or removed from them.	*[Origin: N/A]* *[Authority: WAC 173-401-615(1)(b)]*

M5. Sulfur Dioxide Emissions Monitoring. The following fuel-specific monitoring is required:

TABLE M2: Fuel-Specific Sulfur Monitoring

Approved Fuel Type	Required Monitoring
#2 Fuel Oil	• The Permittee shall verify via fuel certifications, SDS or written contract with the #2 fuel oil supplier the sulfur content of the fuel purchased and that it was 0.5% sulfur by weight or less. • When required, SO_2 emission rates shall be determined via mass-balance calculation methods using the verified fuel sulfur content, the actual amount of fuel combusted, and assuming all sulfur is converted to SO_2.

Diesel	• The Permittee shall verify via fuel certifications, SDS or written contract with the diesel supplier that the sulfur content of the fuel purchased was 0.0015% sulfur or less. • When required, SO_2 emission rates shall be determined via mass-balance calculation methods using a sulfur content of 0.0015% by weight, the actual amount of fuel combusted, and assuming that all sulfur is converted to SO_2.
Propane or Natural Gas	• The Permittee shall confirm via fuel certifications, SDS or written contract with the gas supplier that only natural gas or propane was supplied. • When required, SO_2 emissions rates shall be determined using the natural gas emission factors from AP-42 and the actual amount of natural gas or propane combusted.

[Origin: NOC# 07NOC554 Condition 3 (EU11)]
[Authority: WAC 173-401-600(1)(c) (EU11); WAC 173-401-615(1)(b) (Facility-wide)]

M6. General Source Testing Procedures and Methods. To demonstrate compliance, Ecology or ORCAA may conduct or require that a test be conducted of the source in accordance with the following conditions:

a) General Test Methods. Use approved EPA methods from 40 CFR Parts 51, 60, 61 and 63 (in effect on July 1, 2015), approved procedures contained in "*Source Test Manual – Procedures for Compliance Testing,*" state of Washington, Department of Ecology, as of September 20, 2004, on file at Ecology, or other methods approved by ORCAA. The operator of the source shall be required to provide the necessary platform and sampling ports for ORCAA personnel or others to perform a test of an emissions unit. ORCAA shall be allowed to obtain a sample from any emissions unit. The operator of the source shall be given an opportunity to observe the sampling and to obtain a sample at the same time.
[Origin: WAC 173-400-105(4)]

b) Appropriate Testing Facilities. When requested by ORCAA, the Permittee is required to provide an appropriate source testing platform and sampling ports.
[Origin: ORCAA Rule 1.5(j)(local only)]

[Origin: Listed by sub-condition]
[Authority: WAC 173-401-615(1)(b)]

M7. Pollution Control Equipment Monitoring. The Permittee shall monitor air pollution control equipment and systems for the specified emissions units according to Table M3 and shall monitor and document corrective actions taken to maintain operations within target operating ranges. The Permittee is exempt from monitoring an emissions unit when it is shut down, provided the

Permittee keeps a contemporaneous record showing that the emissions unit did not operate during the entirety of the corresponding monitoring period.

TABLE M3: Prescribed Operating Ranges for Pollution Control Equipment

Lamination and Plug Fabrication				
EU	**Origin**	**Monitoring Requirement**	**Prescribed Operating Ranges and Parameters**	**Frequency**
EU1 EU2 EU4 EU6 EU7	N/A	a) Inspect condition of ventilation system filters.	Ventilation system filter condition: 1. Filters are operable meaning they are not over-loaded with accumulated material to the point of being "blinded". 2. Filters properly aligned and seated. 3. No substantial, visible rips, tears, or holes.	Weekly
		b) Inspect condition of ventilation system plenums	Ventilation system plenum free of significant amounts of accumulated dust.	Monthly
		c) Inspect ventilation system fans, ducts, and stacks.	Fan housing and blades free of significant accumulated buildup.	Quarterly
Spray Painting				
EU	**Origin**	**Monitoring Requirement**	**Prescribed Operating Ranges and Parameters**	**Frequency**
EU3 EU5 EU6 EU7 EU10	NOC# 657 Condition 3 (EU5)	a) Inspect condition of spray booth filters.	1. Filters are operable meaning they are not over-loaded with accumulated material to the point of being "blinded". 2. Filters properly aligned and seated to cover all openings of the exhaust plenum of the spray booth. 3. No substantial visible rips, tears, or holes.	Daily (EU5)
	NOC# 08NOC598 Condition 3 (EU3)			Weekly (EU3, EU10)

	NOC# 06NOC462 Condition 9 (EU10)			
	N/A	b) Inspect condition of spray booth plenums.	Spray booth plenum free of significant amounts of accumulated dust.	Monthly
	NOC# 657 Condition 4(c) (EU5)	c) Inspecting the stack and fan blades	Fan housing and blades free of significant accumulated build-up.	Quarterly
Baghouse Monitoring				
EU	**Origin**	**Monitoring Requirement**	**Prescribed Operating Ranges and Parameters**	**Frequency**
EU8 EU9	N/A	a) Inspect condition of baghouse	1. Monitoring pressure drop to ensure it is within manufacturer specifications which shall be documented in the unit's O&M plan. 2. Keep bags/filters on hand and change when necessary- no substantial/visible rips, tears, or holes. The filter specifications shall match manufacturer recommendations and be documented in the unit's O&M plan.	Weekly

[Authority: WAC 173-401-600(1)(c) (EU3, EU5, EU10); WAC 173-401-615(1)(b)(All emission units listed in table)]

M8. Monitoring Compliance with Emissions Limit. Compliance with the plant-wide VOC emission limit in Condition PW12 shall be monitored as follows:

- **a)** The Permittee shall monitor compliance with the plant-wide VOC limit on at least a monthly basis by computing actual VOC emissions over the previous month and previous 12-consecutive month period;
- **b)** Actual emissions of VOC shall be calculated using mass balance methods based on ORCAA approved emission factors, actual materials used over the period, the percent breakdown of methods used to apply the material (spray, impregnator, flow coater, etc.), and the actual percent composition of each unique material;
- **c)** Actual material usage in pounds per month of each unique VOC containing material, except for material purchased in handheld spray cans and materials purchased in containers which are less than one (1) gallon, shall be determined by conducting a monthly facility inventory;
- **d)** Results from the monthly inventory shall be cross checked with material purchase records required by RK13;
- **e)** The percent breakdown of the methods used to apply each material shall be determined as specified in the approved Application Methods Audit Plan required by Condition AR1.1f and M9; and,
- **f)** The VOC composition of each unique material shall be determined based on Safety Data Sheets (SDS) and/or Certificates of Analyses specific to each material.

[Origin: NOC# 09MOD701 Condition 3]
[Authority: WAC 173-401-600(1)(c); WAC 173-401-615(1)(b)]

M9. Application Methods Audit Plan. The Permittee shall monitor lamination methods used to apply each composite resin at the Facility on a monthly basis. Procedures for conducting monthly audits shall be outlined in the Application Methods Audit Plan required by AR1.1f. At a minimum, the plan shall outline how the resin usage is monitored throughout the Facility and detail how the usages are attributed to the various application methods. Results from the monthly inventory shall be cross checked with material purchase records required by RK13.
[Origin: NOC# 09MOD701 Condition 3(d); NOC# 09MOD701 Condition 5]
[Authority: WAC 173-401-600(1)(c); WAC 173-401-615(1)(b)]

M10. Monitoring Compliance with Coating Limits. The Permittee shall monitor compliance with the coating limits in Condition AR5.1a on a monthly basis. Actual material use shall be monitored according to M8c) and M8d).
[Origin: NOC# 06NOC461 Condition 7]
[Authority: WAC 173-401-600(1)(c); WAC 173-401-615(1)(b)]

M11. Incidental Furniture Manufacturer Status. The Permittee shall demonstrate that the source meets the criteria of an incidental furniture manufacturer on a monthly basis by confirming that the total finishing materials and adhesives used on wood furniture or wood furniture components is not more than 100 gallons per month. Actual material use shall be monitored according to M8c) and M8d).

[Origin: 40 CFR § 63.800(a); 40 CFR § 63.801(a)]
[Authority: WAC 173-401-600(1)(a); WAC 173-401-615(1)(b)]

M12. Subpart II Monitoring "low-usage exempt" Applicability. To demonstrate compliance with Condition AR2.1a, the Permittee shall monitor the total volume of "low-usage exempt" coatings applied to ships on at least a monthly basis. The Permittee shall compute the actual amount of "low-usage exempt" coatings applied to ships over the previous month and previous 12-consecutive month period and compare it against the applicable gallon thresholds outlined in Condition AR2.1a. Actual material use shall be monitored according to M8c) and M8d).
[Origin: N/A]
[Authority: WAC 173-401-615(1)(b)]

M13. Subpart II Compliance Procedures.

a) For each batch of coating that is received by the Permittee and is subject to Subpart II, as required by Condition AR2.1c, the Permittee shall:
  i) Determine the coating category and the applicable VOHAP[2] limit as specified in 40 CFR § 63.783(a);
  ii) Certify the as-supplied VOC content of the batch of coating. The Permittee may use a certification supplied by the manufacturer for the batch, although the Permittee retains liability should subsequent testing reveal a violation. If the Permittee performs the certification testing, only one of the containers in which the batch of coating was received is required to be tested. Certify means to attest to the VOC content as determined through analysis by Method 24 of appendix A to 40 CFR Part 60 or through use of forms and procedures outlined in appendix A of Subpart II, or to attest to the VOHAP content as determined through an Administrator of U.S. EPA approved test method. In the case of conflicting results, Method 24 of appendix A to 40 CFR Part 60 shall take precedence over the forms and procedures outlined in appendix A of Subpart II for the options in which VOC is used as a surrogate for VOHAP.

b) As-applied compliance requirements:
  i) In lieu of testing each batch of coating, as-applied, the Permittee may determine compliance with the VOHAP limits using any combination of the procedures described in 40 CFR § 63.785(c)(1)- 40 CFR § 63.785(c)(4). The procedure used for each coating shall be determined and documented prior to application.
  ii) The results of any compliance demonstration conducted by the Permittee or any regulatory agency using Method 24 shall take precedence over the results using the procedures in paragraphs 40 CFR § 63.785(c)(1), 40 CFR § 63.785(c)(2), or 40 CFR § 63.785(c)(3) of Subpart II.
  iii) The results of any compliance demonstration conducted by the Permittee or any regulatory agency using an approved test method to determine VOHAP content shall

[2] VOHAP as defined in Section I of this AOP (Abbreviations and Definitions)

take precedence over the results using the procedures in paragraph 40 CFR § 63.785(c)(4) of this section.

c) A violation revealed through any approved test method shall result in a 1-day violation for enforcement purposes. A violation revealed through the recordkeeping procedures described in paragraphs 40 CFR § 63.785(c)(1) through 40 CFR § 63.785(c)(4) of Subpart II shall result in a 30-day violation for enforcement purposes, unless the owner or operator provides sufficient data to demonstrate the specific days during which noncompliant coatings were applied.

[Origin: 40 CFR § 63.785(a); 40 CFR § 63.785(b); 40 CFR § 63.785(d)]
[Authority: WAC 173-401-600(1)(a)]

M14. Subpart VVVV Monitoring of Exemptions from Open Molding Emission Limit. If the Permittee is claiming any exemptions under Condition AR1.1a, the Permittee must monitor the following:

a) For production resins exempt under Section a) of Condition AR1.1a, the method by which each resin is applied;

b) For gel coats and vinyl ester skin coat resins exempt under Section b) of Condition AR1.1a and Section c) of Condition AR1.1a, the amount of each resin and gel coat used on a monthly basis. The Permittee shall also:

i) Calculate the weight percent of total exempt gel coats used on a 12-month rolling-average basis and verify that the weight percent of exempt gel coats used does not exceed 1 percent of all gel coats used at the facility.

ii) Calculate the weight percent of total exempt vinyl ester skin coat resins used on a 12-month rolling-average basis and verify that the weight percent of exempt vinyl ester skin coat resins does not exceed 5 percent of all resin used at the facility.

[Origin: 40 CFR § 63.5698(d)]
[Authority: WAC 173-401-600(1)(a)]

M15. Subpart VVVV Monitoring Compliance with the Open Molding Emission Limit. The Permittee shall demonstrate compliance with Condition AR1.1a on a 12-month rolling-average basis. Compliance shall be demonstrated using the calculation methods specified in 40 CFR Part 63 Subpart VVVV. The calculation methods are summarized in Attachments 2 and 3 of this permit.

[Origin: 40 CFR § 63.5701(a); 40 CFR § 63.5701(b)]
[Authority: WAC 173-401-600(1)(a)]

M16. Monitoring for Resin and Gel Coat Application Equipment Cleaning Operations Organic HAP Limit. The Permittee shall determine the organic HAP content of the cleaning solvents subject to Condition AR1.1c using the methods specified in Attachment 3. If you recycle cleaning solvents on site, you 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 Attachment 3 for demonstrating compliance with the organic HAP limits.

[Origin: 40 CFR § 63.5737(a); 40 CFR § 63.5737(b); 40 CFR § 63.5758(a)]

[Authority: WAC 173-401-600(1)(a)]

M17. Monitoring for Carpet and Fabric Adhesive Organic HAP Limit. The Permittee shall monitor and determine the organic HAP content of all carpet and fabric adhesives using one of the methods specified in Attachment 3.
[Origin: 40 CFR § 63.5740(b); 40 CFR § 63.5758(a)]
[Authority: WAC 173-401-600(1)(a)]

M18. Monitoring Compliance with Engine Operating Limits. The hours of operation for the emergency engines shall be monitored on a monthly basis using a non-resetting, factory-installed engine hour meter to verify compliance with the applicable hour operating limits set forth in Condition AR6.1b and Condition AR6.2a. The Permittee must monitor how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation.
[Origin: 40 CFR § 63.6625(f) (EU13); 40 CFR § 63.6655(f) (EU13); NOC# 07NOC554 Condition 2 (EU11)]
[Authority: WAC 173-401-600(1)(a) (EU13); WAC 173-401-600(1)(c) (EU11); WAC 173-401-615(1)(b) (EU11 & EU12)]

M19. Monitoring Metal Etching and Evaporator Operations and Maintenance. The Permittee shall monitor the powder coating preparation process, including the evaporator, to assure continuous compliance with applicable air regulations and standards. Monitoring shall include, but not be limited to, the following:

- **a)** Operating, maintaining, and repairing the evaporator in accordance with manufacturer specifications. This shall include, but not be limited to, cleaning the evaporator at least once every sixty operating days and inspecting the fan blades and housing at least once every twelve months;
- **b)** Inspecting, cleaning, and calibrating the pH monitor at least once a month; and,
- **c)** Monitoring the pH of the enclosed tank prior to adding wastewater to the evaporator unit to ensure that the pH remains between 8-12.

[Origin: NOC# 13NOC978 Condition 2]
[Authority: WAC 173-401-600(1)(c); WAC 173-401-615(1)(b); WAC 173-401-615(1)(c)]

[END OF SECTION]

IX. Recordkeeping Requirements (RK)

Plant-wide Recordkeeping

The following recordkeeping requirements apply plant-wide.

RK1. Retention and Availability of Records. The Permittee shall maintain all records required by this permit. All required records shall be retained for at least 5 years from the origination date and shall be available for inspection by ORCAA upon request. Each record must be kept on site for at least 2 years after the date that each record is generated. The Permittee can keep the records offsite for the remaining 3 years.
[Origin: WAC 173-401-615(2)(c); NOC# 08NOC598 Condition 6; NOC# 08NOC620 Condition 4; 08NOC630 Condition 4; NOC# 08NOC638 Condition 3; NOC# 13NOC978 Condition 3]
[Authority: WAC 173-401-600(1)(c); WAC 173-401-615(2)]

RK2. Record of Changes. The Permittee shall maintain records describing changes made resulting in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those changes.
[Origin: WAC 173-401-615(2)(b); WAC 173-401-724(5)]
[Authority: WAC 173-401-615(2)]

RK3. Monitoring Records. The Permittee shall keep the following records:

Equipment/Operation	Required Record	Origin
Plant-wide Opacity Monitoring (M1 and M2)	Records of each opacity survey and opacity reading, including: a) The date, location, time, wind direction, sky condition, sun location with respect to the facility, the person conducting the survey/reading, emission unit operating conditions, results; and b) The data elements required by the reference method(s).	WAC 173-401-615(2)(a)
Plant-wide Fugitive Emissions and Dust Monitoring (M4)	Records of monthly audits, including: a) The date of the audit; and, b) The findings including any steps taken to prevent fugitive emissions and dust.	WAC 173-401-615(2)(a)
Plant-wide General Source Testing Procedures and Methods (M6)	Records of testing including, where applicable, the following: a) The date, location, and time of sampling measurement; b) The date(s) analysis were performed; c) The company or entity that performed the analyses; d) The analytical techniques or methods used;	WAC 173-401-615(2)(a)

	e) The results of the analyses; and, f) The operating conditions existing at the time of sampling or measurement.	

[Authority: WAC 173-401-615(2)]

RK4. Record of Permit Deviations. The Permittee shall maintain a contemporaneous record of all permit deviations.
[Origin: WAC 173-401-615(3)(b)]
[Authority: WAC 173-401-615(2)]

RK5. Emissions Records. The Permittee shall maintain and make available upon request any records of information necessary to substantiate any reported emissions, consistent with the averaging times for the applicable standards.
[Origin: WAC 173-400-105(1); ORCAA Rule 8.11(a) (local only)]
[Authority: WAC 173-401-615(2)]

RK6. Unlawful Reproduction or Alteration of Documents. No person shall reproduce or alter, or cause to be reproduced or altered, any order, registration certificate or other paper issued by ORCAA if the purpose of such reproduction or alteration is to evade or violate any applicable requirement.
[Origin: ORCAA Rule 7.3 (local only)]
[Authority: WAC 173-401-615(2)]

RK7. Display of Orders, Certificates and Other Notices. Any order required by ORCAA Regulations shall be available on the premises designated on the order. In the event ORCAA requires a notice to be displayed, it shall be posted.
[Origin: ORCAA Rule 7.4 (local only)]
[Authority: WAC 173-401-615(2)]

RK8. Record of Complaints. The Permittee shall keep a record of air quality related complaints received, the assessment of the validity of each complaint, and what, if any, corrective action was taken in response to the complaint. Records shall include, if available or provided, the following information:

- **a)** Description of the complaint;
- **b)** Date and time the alleged impact was first noticed;
- **c)** Date and time the alleged impact was last noticed;
- **d)** Location where the alleged impact was experienced;
- **e)** Name and phone number of caller;
- **f)** The Permittee's assessment of the complaint; and,
- **g)** Description of any investigation or corrective action taken.

[Origin: WAC 173-400-040(6) (state/local only); ORCAA Rule 7.6 (local only); ORCAA Rule 8.3(e) (local only); ORCAA Rule 8.5 (local only); NOC# 09MOD701 Condition 1(c)]
[Authority: WAC 173-401-615(2)]

RK9. Record of Actions Taken to Maintain Air Pollution Control Equipment. The Permittee shall keep a record of any actions taken to maintain air pollution control equipment in good operating condition and repair including repairs or routine maintenance actions and actions involving only inspection of the equipment. Such records shall include:

a) Date and time the action commenced;
b) Description of the action;
c) Description of outcome or findings;
d) Date and time the action was completed;
e) Name of person or company performing the maintenance; and,
f) Duration of time the subject equipment was not operational.

[Origin: ORCAA Rule 8.8 (local only)]
[Authority: WAC 173-401-615(2)]

RK10. MACT Applicability Records. For each relevant standard or other applicable requirement under 40 CFR Part 63, which the Permittee determines inapplicable, the Permittee shall keep record of the applicability determination on site for five years after the determination, or until the source changes its operations to become an affected source, whichever comes first. For the purposes of this condition, a relevant standard is defined as any standard for which:

a) The source emits or has the potential to emit (without considering controls) one or more hazardous air pollutants regulated by the standard; and,
b) The source belongs to the source category regulated by the standard.

The record of the applicability determination must be signed by the person making the determination and include an analysis (or other information) demonstrating why the Permittee believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) shall be sufficiently detailed to allow ORCAA to make a finding about the source's applicability status regarding the relevant standard or other requirement. If required, the analysis shall be performed in accordance with requirements established in the relevant subpart for this purpose, and the analysis should be performed in accordance with EPA guidance materials published to assist sources in making applicability determinations under section 112, if any.
[Origin: 40 CFR § 63.1(b)(3); 40 CFR § 63.10(b)(3)]
[Authority: WAC 173-401-615(2)]

RK11. Operation and Maintenance Plan Records. The Permittee shall maintain written copies of all Operation and Maintenance plans required under this permit. The plans must be maintained on site and be made available for inspection.
[Origin: ORCAA Rule 8.11; NOC# 657 Condition 4; NOC# 04NOC351 Condition 2; NOC# 06NOC462 Condition 9; NOC# 07NOC554 Condition 6(a); NOC# 08NOC598 Condition 6; NOC# 08NOC620 Condition 4; NOC# 08NOC630 Condition 4; NOC# 08NOC638 Condition 3; NOC# 13NOC978 Condition 2]
[Authority: WAC 173-401-615(2)]

RK12. Application Methods Audit Plan Records. The Permittee shall maintain a written plan as required by Condition AR1.1f and M9.
[Origin: NOC# 09MOD701 Condition 5]
[Authority: WAC 173-401-615(2)]

RK13. Material Use Records. The Permittee shall maintain the following records:

- **a)** Monthly and 12-month cumulative VOC emissions records;
- **b)** Material usage records from monthly material-use inventories;
- **c)** Purchase records for all VOC- and HAP-containing materials used except materials contained in hand-held spray cans and materials purchased in containers which are less than one gallon;
- **d)** Copies of up-to-date and representative Certificates of Analysis or Safety Data Sheets (SDS) for all materials described in (c) above;
- **e)** Monthly records of percent breakdown of application methods used to apply each unique material;
- **f)** Monthly usage records for all finishing materials and adhesives used on wood furniture or wood furniture components including, but not limited to, those with material use limits in Condition AR5.1a. Finishing materials include, but are not limited to, stains, basecoats, wash coats, enamels, sealers, and topcoats.

[Origin: 40 CFR § 63.788(b)(1); 40 CFR § 63.800(a); NOC# 06NOC462 Condition 8; NOC# 09MOD701 Condition 3; NOC# 09MOD701 Condition 4]
[Authority: WAC 173-401-615(2)]

RK14. MACT Recordkeeping. The Permittee shall keep records of all information required by Part 63 (including reports and notifications) as follows:

- **a)** Records must be readily available and in a form such that they can be easily inspected and reviewed.
- **b)** Each record must be kept for 5 years following the date that each record is generated.
- **c)** Each record must be kept on site for at least 2 years after the date that each record is generated. You can keep the records offsite for the remaining 3 years.
- **d)** Records may be kept on paper or an alternative media, such as microfilm, computer, computer disks, magnetic tapes, or on microfiche. Any records submitted electronically via the EPA's CEDRI may by maintained in electronic format. The ability to maintain electronic copies does not affect the requirement for facilities to make records, data, and reports available upon request to ORCAA or the EPA as part of an on-site compliance evaluation.
- **e)** The Permittee shall keep all documentation supporting any notification or report submitted.

[Origin: 40 CFR § 63.10(b)(1); 40 CFR § 63.7555(a); 40 CFR § 63.7560; 40 CFR § 63.5767(a); 40 CFR § 63.5767(b); 40 CFR § 63.5770]
[Authority: WAC 173-401-615(2)]

RK15. Subpart II Recordkeeping. The Permittee shall compile records listed below on a monthly basis:

a) A copy of the approved implementation plan as required by Condition AR2.1b;
b) The volume of each low-usage-exempt coating applied;
c) Identification of the coatings used, their appropriate coating categories, and the applicable VOHAP limit;
d) Certification of the as-supplied VOC content of each batch of coating;
e) A determination of whether containers meet the standards as described in 40 CFR § 63.783(b)(2) and 40 CFR § 63.783(b)(3);
f) The results of any Method 24 of appendix A to 40 CFR part 60 or approved VOHAP measurement test conducted on individual containers of coating, as applied;
g) Monthly and 12-month cumulative records of the total volume of coating applied to ships; and
h) Additional information as determined by the compliance procedure(s) that the Permittee followed as described in 40 CFR § 63.788(b)(3).

[Origin: 40 CFR § 63.788(b)(1); 40 CFR § 63.788(b)(2); 40 CFR § 63.788(b)(3)]
[Authority: WAC 173-401-615(2)]

RK16. Subpart II Violation Recordkeeping. If the Permittee detects a violation of the standards specified in Conditions AR2.1a-AR2.1f, the Permittee shall, for the remainder of the semi-annual monitoring reporting period (Condition R3) during which the violation(s) occurred, include the information listed in 40 CFR § 63.788(b)(4)(i)-(iv) in his or her records.
[Origin: 40 CFR § 63.788(b)(4)]
[Authority: WAC 173-401-615(2)]

RK17. Subpart VVVV Open Molding Material Use Recordkeeping. The Permittee shall keep the following:

a) Records for each resin and gel coat as listed below:
  i) Hazardous air pollutant content.
  ii) Amount of material used per month.
  iii) Application method used for production resin and tooling resin.
  iv) Calculations performed to demonstrate compliance based on MACT model point values or based on weighted-average organic HAP content, dependent on which option is currently being used to demonstrate compliance.
b) Records of the total amounts of open molding production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat used per month and the weighted-average organic HAP contents for each operation, expressed as weight-percent. For open molding production resin and tooling resin, records of the amounts of each applied by atomized and nonatomized methods.

[Origin: 40 CFR § 63.5704(a)(3); 40 CFR § 63.5704(b)(3); 40 CFR § 63.5767(c)(1)]
[Authority: WAC 173-401-615(2)]

RK18. Subpart VVVV Recordkeeping for Exemptions from Open Molding Emission Limit. For all exemptions claimed in Condition AR1.1a, the Permittee shall keep records of the following:

a) For production resins exempt under Section a) of Condition AR1.1a,a record of the resins for which you are using this exemption and the method(s) by which each resin is applied;

b) For gel coats exempt under Section b) of Condition AR1.1a, a record of the amount of gel coats used per month for which you are using this exemption and copies of calculations showing that the exempt amount does not exceed 1 percent of all gel coat used on a 12-month rolling-average basis.

c) For vinylester resin exempt under Section c) of Condition AR1.1a, a record of the amount of 100 percent vinylester skin coat resin used per month that is eligible for this exemption and copies of calculations showing that the exempt amount does not exceed 5 percent of all resin used on a 12-month rolling-average basis.

[Origin: 40 CFR § 63.5698(d)]
[Authority: WAC 173-401-615(2)]

RK19. Subpart VVVV Equipment Cleaning Operations Organic HAP Limit Recordkeeping. The Permittee shall keep records of the organic HAP content of the cleaning solvents subject to Condition AR1.1c.
[Origin: 40 CFR § 63.5737(a)]
[Authority: WAC 173-401-615(2)]

RK20. Subpart VVVV Mixing and Cleaning Operations Recordkeeping. The Permittee shall keep the following records:

a) Records of which mixing containers are subject to Condition AR1.1b;

b) Records of the results of the monthly inspections of mixing operations and organic solvent storage required by Condition M4, including a description of any repairs or corrective actions taken.

[Origin: 40 CFR § 63.5731(d); 40 CFR § 63.5737(c)]
[Authority: WAC 173-401-615(2)]

RK21. Subpart VVVV Carpet and Fabric Adhesive Operations Organic HAP Limit Recordkeeping. The Permittee shall keep records of the organic HAP content of carpet and fabric adhesives used subject to Condition AR1.1e.
[Origin: 40 CFR § 63.5740(b)]
[Authority: WAC 173-401-615(2)]

RK22. Subpart ZZZZ Recordkeeping. The Permittee shall keep records of the following for EU13:

a) Records of the occurrence and duration of each malfunction of the engine or the hour meter;

b) Records of actions taken during periods of malfunction to minimize emissions in accordance with 40 CFR § 63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation;

c) Records of the amount of the engine's time spent at idle during startup.

[Origin: 40 CFR § 63.6602; 40 CFR § 63.6605; 40 CFR § 63.6625(h)]
[Authority: WAC 173-401-615(2)]

RK23. Emergency Engine Operating Hours and Maintenance Records. The Permittee shall keep records of the following for each emergency engine:

- **a)** Records of hours of operations on a monthly basis and 12-month rolling total as required by Condition M18.
- **b)** Records to document conformance with the management practice standards including the dates of each oil and filter change, air filter inspection, and hose and belt inspection and replacement.

[Origin: 40 CFR § 63.6605 (EU13); 40 CFR § 63.6640(f) (EU13); WAC 173-401-615(2) (EU12)); NOC# 07NOC554 Condition 6(b) (EU11)]
[Authority: WAC 173-401-615(2)]

RK24. Fuel Sulfur Limit Recordkeeping. The Permittee shall keep records of all monitoring conducted for Condition M5. For compliance demonstrations based on fuel purchase invoices, records shall indicate the supplier, date, quantity, grade, and the certified percent sulfur of the fuel.
[Origin: NOC# 07NOC554 Condition 6(c)]
[Authority: WAC 173-401-615(2)]

RK25. Metal Etching and Evaporator Records. The Permittee shall maintain records of the following:

- **a)** Records of pH monitoring required by Condition M19;
- **b)** Records associated with calibrating the pH monitor as required by Condition M19; and,
- **c)** Records of maintenance checks and repairs conducted on the evaporator.

[Origin: NOC# 13NOC978 Condition 3]
[Authority: WAC 173-401-615(2)]

[END OF SECTION]

X. Reporting Requirements (R)

Plant-wide Reporting

The following reporting requirements apply plantwide.

R1. Annual Compliance Certification. The Permittee shall submit an Annual Compliance Certification report to ORCAA and the U.S. Environmental Protection Agency (EPA) Administrator, in care of Region 10 of the EPA (EPA) certifying the status of compliance with respect to all permit conditions during the previous 12-month period. Annual Compliance Certification Reports shall be submitted to ORCAA and EPA on or before July 30 each year and shall cover the continuous 12-month period ending the previous June 30th (July 1st through June 30th). Annual Compliance Certification Reports shall certify the status of compliance continuously over the certification period, and the certification period shall not exceed 12 months from the end of the certification period covered in the previous certification. The reports shall be certified by a responsible official in accordance with Condition G5. Annual Compliance Certification reports shall include:

- **a)** Identification of each term or condition of the permit that is the basis of the certification.
- **b)** Certification of the status of compliance with each term or condition of the permit and whether compliance was continuous or intermittent over the reporting period.
- **c)** Identification of the method(s) or other means used by the Permittee for determining the compliance status, and whether such methods or other means provide continuous or intermittent data.

[Origin: WAC 173-401-630(5)]
[Authority: WAC 173-401-615(3)]

R2. Confidential Information. Records or other information submitted to ORCAA, that are considered by the Permittee to be proprietary and confidential, shall be only for the confidential use of ORCAA provided:

- **a)** The information relates to processes or production unique to the Permittee or are likely to affect adversely the competitive position of the Permittee if released to the public or to a competitor;
- **b)** The Permittee follows ORCAA's policy for submitting confidential information; and,
- **c)** The Permittee certifies the proprietary and/or confidential nature of the records or information.

[Origin: ORCAA Rule 1.6 (local only)]
[Authority: WAC 173-401-615(3)]

R3. Semi-Annual Monitoring Reports. The Permittee shall submit a semi-annual monitoring report (SAMR) summarizing monitoring conducted during the previous continuous six-month period on or before January 30th and July 30th of each year. SAMRs submitted by January 30th shall include, at a minimum, monitoring conducted during July 1st through December 31st of the previous year. SAMRs submitted by July 30th shall cover, at a minimum, monitoring conducted during the previous January 1st through June 30th. SAMRs shall include a summary of results from all monitoring required by this permit. SAMRs shall be certified by a responsible official in accordance with Condition G5 and shall include the following information as applicable:

- **a)** A summary of results of all required monitoring for all emissions units over the reporting period;
- **b)** Identification and characterization of all instances of deviations from permit requirements;
- **c)** Summary description of any corrective actions taken to maintain air pollution controls in good operating condition;

In lieu of submitting a paper copy to ORCAA, the Permittee may submit this report electronically using EPA's Compliance and Emissions Data Reporting Interface (CEDRI).
[Origin: WAC 173-401-615(a)]
[Authority: WAC 173-401-615(3)]

R4. Reporting Deviations from Permit Conditions. The Permittee shall promptly report any deviations from permit conditions, including those attributable to upset conditions as defined in this permit. The following conditions shall apply:

- **a) Prompt Reporting.** For purposes of this permit, submitting a report "promptly" means the following:
  - **i) Potential Threat to Human Health or Safety:** If the deviation presents a potential threat to human health or safety, "promptly" means as soon as possible but no later than 12 hours after discovery of the deviation. This notification may be made by email, however, the Permittee shall also submit a written notice within 10 days of the occurrence;
  - **ii) Other Deviations:** For other deviations, "promptly" means as soon as possible but no later than 30 days after the end of the month during which the deviation was discovered;
  - **iii) Emergencies:** Except for potential threats to human health or safety, deviations due to an emergency (as defined in Condition A12) must be reported within two working days of the time when emission limitations were exceeded to qualify for relief under Condition A12.
- **b) Deviation Report Content.** Permit deviation reports shall describe the probable cause of such deviations, corrective actions taken or planned, and preventive measures taken.
- **c) Reporting Unavoidable Excess Emissions.** The deviation report may include demonstration that excess emissions were unavoidable due to start-up, shutdown, upset or malfunction, consistent with the requirements of either Condition A13 or A14, as applicable.

d) Reporting Deviations Due to Emergencies. The deviation report may include demonstration that excess emissions were due to an emergency, consistent with the requirements of Condition A12.

[Origin: WAC 173-401-615(3)(b); WAC 173-401-645(3)(d)]
[Authority: WAC 173-401-615(3)]

R5. Notification of Complaint Received. The Permittee shall notify ORCAA of any complaint received as soon as possible, but no later than 48-hours from when the complaint is received. If requested by ORCAA, the Permittee shall submit a complaint investigation report which shall include a short description of the complaint, time it was received, actions taken, actions planned and preliminary assessment. Any complaint investigation report submitted shall be certified according to Condition G5.
[Origin: WAC 173-400-040(6) (state/local only); ORCAA Rule 7.6 (local only); ORCAA Rule 8.3(e) (local only); ORCAA Rule 8.5 (local only); 09MOD701 Condition #1(d)]
[Authority: WAC 173-401-600(1)(c); WAC 173-401-615(3)]

R6. Annual Inventory Report. No later than March 1st of each year, the Permittee shall submit an inventory of the actual amount of pollutants emitted during the previous calendar year. The inventory shall be submitted to ORCAA on standard inventory reporting forms and be accompanied by associated calculations, data or other information used in calculating the reported emissions. A request for an extension may be considered if a request from the Responsible Official is received by ORCAA prior to February 25th. The request must include a statement of the unexpected circumstances that occurred, how this affected the Permittee's ability to submit the report on time, and the number of additional days needed.
[Origin: WAC 173-400-105(1); ORCAA Rule 8.11 (local only)]
[Authority: WAC 173-401-615(3)]

R7. Notification of Control Equipment Malfunction. The Permittee shall notify ORCAA of malfunctions of pollution control equipment identified in Condition M7 when repairs cannot be completed within 24 hours. For purposes of this notification, the term "malfunction" shall mean that the control equipment is inoperable or cannot maintain operation within the prescribed operating conditions specified in Condition M7. The notification shall be made within two working days from the time the malfunction was discovered and shall include a description of the malfunction and any corrective actions taken or planned. The notification shall be made by facsimile, e-mail, or in writing. However, if the notification is made by facsimile or e-mail, the Permittee shall also submit a written notice within 10 days of the occurrence.
[Origin: WAC 173-401-630(1)]
[Authority: WAC 173-401-615(3)]

R8. Testing Notification and Test Rescheduling.

a) The Permittee shall notify ORCAA in writing at least 30 days prior to any compliance test by submitting a test plan for ORCAA's review. The test plan shall describe the proposed source test methods, operational conditions proposed for the test, and provisions for monitoring source operation during the test.

b) Rescheduling: If, after providing written notice of a performance test, there is a delay (due to operational problems, etc.) in conducting the scheduled performance test, the owner or operator of an affected facility shall notify ORCAA as soon as possible of the delay by providing at least seven days prior notice of the rescheduled date of the performance test, or by arranging a rescheduled test date with ORCAA by mutual agreement.

[Origin: WAC 173-401-630(1)]
[Authority: WAC 173-401-615(3)]

R9. Source Test Reports. Whenever source testing is required, the Permittee shall submit test results to ORCAA within 45 days of test completion. The report shall include:

a) A description of the source and sampling location;
b) The time and date of the test;
c) A summary of results, reported in units and for averaging periods consistent with the applicable emission standard;
d) A description of the test methods and quality assurance procedures used;
e) The amount of fuel burned and/or raw material processed by the source during the test;
f) The operating parameters of the source and control equipment during the test; and,
g) Field data and example calculations.

[Origin: WAC 173-401-630(1)]
[Authority: WAC 173-401-615(3)]

R10. Subpart II Compliance Report. The Permittee shall submit Subpart II semi-annual compliance reports to ORCAA before the 60th day following the completion of each 6-month period. Each semi-annual report shall cover, at a minimum, operations for January 1st through June 30th and July 1st through December 31st. The report shall include the following information for the reporting period:

a) The volume of each low-usage-exempt coating applied;
b) Identification of the coatings used, their appropriate coating categories, and the applicable VOHAP limit;
c) A determination of whether containers meet the standards as described in Condition AR2.1e;
d) The results of any Method 24 of appendix A to 40 CFR part 60 or approved VOHAP measurement test conducted on individual containers of coating, as applied;
e) Information that must be retained pursuant to 40 CFR § 63.788(b)(3), as applicable, except for that information specified in paragraphs 40 CFR § 63.788(b)(3)(i)(A), 40 CFR § 63.788(b)(3)(ii)(A), and 40 CFR § 63.788(b)(3)(iii)(A);and
f) If a violation at an affected source is detected, the Permittee shall also report the information specified in Condition RK16 of Subpart II for the reporting period during which the violation(s) occurred. To the extent possible, the report shall be organized according to the compliance procedure(s) followed each month by the Permittee. If there was a malfunction during the reporting period, the report must also include the number, duration and a brief description of each malfunction which occurred during the reporting period and which caused or may have caused any applicable emission

limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with Condition AR2.1d, including actions taken to correct a malfunction.

In lieu of submitting a paper copy to ORCAA, the Permittee may submit this report electronically using EPA's Compliance and Emissions Data Reporting Interface (CEDRI).

[Origin: §63.10(a)(5); 40 CFR § 63.788(c)]
[Authority: WAC 173-401-615(3)]

R11. Subpart VVVV Compliance Report. The Permittee shall submit Subpart VVVV semi-annual compliance reports to ORCAA before the 60th day following the completion of each 6-month period. Each semi-annual report shall cover, at a minimum, operations for January 1st through June 30th and July 1st through December 31st.The report shall be organized according to the operations covered by Subpart VVVV and the compliance procedure followed for that operation. This report must be submitted electronically to the EPA via CEDRI, according to the procedures outlined in Condition R15. The compliance report must include the following information for the reporting period:

- **a)** Company name and address.
- **b)** A statement by a responsible official with the 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 (January 1 through June 30 or July 1 through December 31).
- **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 you are 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 you were in compliance with the emission limits and work practice standards during the reporting period, you must include a statement to that effect.
- **g)** If you deviated from an emission limit or work practice standard during the reporting period, you must 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 you took to minimize the deviation and actions you have taken to prevent it from happening again.
  - **iv)** A statement of whether or not your facility was in compliance for the 12-month averaging period that ended at the end of the reporting period.

The Permittee may assert a claim of EPA system outage or force majeure if the Permittee meets the criteria in 63.5765(e) or 40 CFR § 63.5765(f), respectively.

[Origin: 40 CFR § 63.5764; 40 CFR § 63.5765(c); 40 CFR § 63.5765(d); 40 CFR § 63.5765(e)]

[Authority: WAC 173-401-615(3)]

R12. Subpart ZZZZ Maintenance and Repair Reporting for EU13. If the management practices in Condition AR6.1a were delayed due to unacceptable risk under Federal, State, or local law, the Permittee shall report the failure to perform the management practices on the required schedule and the Federal, State, or local law under which the risk was deemed unacceptable.
[Origin: 40 CFR § 63.6602 Table 2c]
[Authority: WAC 173-401-615(3)]

R13. Subpart DDDDD Compliance Report. Every five years, a compliance report with the following information must be postmarked or submitted to ORCAA no later than January 31st:

- **a)** Company and Facility name and address.
- **b)** Process unit information, emission limitations, and operating parameter limitations.
- **c)** Date of report and beginning and ending dates of the reporting period (January 1-December 31 of the previous five years).
- **d)** Date of the most recent tune-up for EU15 and EU16.
- **e)** Date of the most recent burner inspection if it was not done on a 5-year period and was delayed until the next scheduled or unscheduled unit shutdown.
- **f)** Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
- **g)** This report must be submitted electronically to the EPA via CEDRI, according to the procedures outlined in Condition R15. Instead of using the electronic report in CEDRI for Subpart DDDDD, you may submit an alternate electronic file consistent with the XML schema listed on the CEDRI Web site (*http://www.epa.gov/ttn/chief/cedri/index.html*). If the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, you must submit the report to ORCAA. You must begin submitting reports via CEDRI no later than 90 days after the form becomes available in CEDRI.

[Origin: 40 CFR § 63.7550]
[Authority: WAC 173-401-615(3)]

R14. Subpart DDDDD Fuel Change Notification. If you have switched fuels or made a physical change to the boiler or process heater and the fuel switch or physical chance resulted in the applicability of a different subcategory, you must provide notice of the date upon which you switched fuels or made the physical change within 30 days of the switch/change. The notification must identify:

- **a)** The name of the owner or operator of the affected source, as defined in 40 CFR § 63.7490, the location of the source, the boiler(s) and process heater(s) that have switched fuels, were physically changed, and the date of the notice.
- **b)** The currently applicable subcategory under 40 CFR Part 63, Subpart DDDDD.
- **c)** The date upon which the fuel switch or physical change occurred.

[Origin: 40 CFR § 63.7545(h)]
[Authority: WAC 173-401-615(3)]

R15. Submitting Reports via CEDRI. Reports submitted electronically via CEDRI, which can be accessed through the EPA's CDX (https://cdx.epa.gov/), shall be submitted as follows:

a) If required to electronically submit a report via CEDRI, you must use the appropriate electronic report template on the CEDRI website (https://www.epa.gov/electronic-reporting-air-emissions/compliance-and-emissions-data-reporting-interface-cedri) for the applicable subpart.

b) If the Permittee claims some of the information submitted via CEDRI is Confidential Business Information (CBI), submit a complete report, including information claimed to be CBI, to the EPA. The report must be generated using the appropriate form on the CEDRI website or an alternate electronic file consistent with the XML schema listed on the CEDRI website. Submit the file on a compact disc, flash drive, or other commonly used electronic storage medium and clearly mark the medium as CBI. Mail the electronic medium to U.S. EPA/OAQPS/CORE CBI Office, Attention: Group Leader, Measurement Policy Group, MD C404-02, 4930 Old Page Rd., Durham, NC 27703. The same file with the CBI omitted must be submitted to the EPA via the EPA's CDX as described earlier in this paragraph.

c) If you are required to electronically submit a report through CEDRI in EPA's CDX, you may assert a claim of EPA system outage for failure to timely comply with the reporting requirement. To assert a claim of EPA system outage, you must meet the requirements outlined in paragraphs (i) through (vii) below:

i) You must have been or will be precluded from accessing CEDRI and submitting a required report within the time prescribed due to an outage of either EPA's CEDRI or CDX systems.

ii) The outage must have occurred within the period of time beginning five business days prior to the date that the submission is due.

iii) The outage may be planned or unplanned.

iv) You must submit notification to the Administrator in writing as soon as possible following the date you first knew, or through due diligence should have known, that the event may cause or has caused a delay in reporting.

v) You must provide to the Administrator a written description identifying:

(1) The date(s) and time(s) when CDX or CEDRI was accessed and the system was unavailable;

(2) A rationale for attributing the delay in reporting beyond the regulatory deadline to EPA system outage;

(3) Measures taken or to be taken to minimize the delay in reporting; and,

(4) The date by which you propose to report, or if you have already met the reporting requirement at the time of the notification, the date you reported.

vi) The decision to accept the claim of EPA system outage and allow an extension to the reporting deadline is solely within the discretion of the Administrator.

vii) In any circumstance, the report must be submitted electronically as soon as possible after the outage is resolved.

[Origin: 40 CFR § 63.5765(c); 40 CFR § 63.5765(d); 40 CFR § 63.7550(h)(3)]
[Authority: WAC 173-401-615(3)]

[END OF SECTION]

XI. Permit Shield Conditions (S)

S1. Permit Shield. Compliance with a permit condition shall be deemed compliance with the applicable requirements upon which that condition is based, as of the date of permit issuance. The permit shield does not apply to any insignificant emissions units or activity designated under WAC 173-401-530.
[Origin: WAC 173-401-640(1)]
[Authority: WAC 173-401-640(1)]

S2. Inapplicable or Exempt Requirements. The requirements shown in Table S.1, as of the date of permit issuance, have been determined not to apply to the corresponding emissions units indicated due to either inapplicability of the requirement or an exemption. Commencing the date of permit issuance, the AOP shield shall cover the requirements specified in Table S.1, as of the date of permit issuance, with respect to the specific emissions units indicated unless applicability of the requirement is triggered by a future action or emissions increase.
[Origin: WAC 173-401-640(2)]
[Authority: WAC 173-401-640(1)]

S3. Exclusions. Nothing in this permit shall alter or affect the following:

- **a)** The provisions of Section 303 of the FCAA (emergency orders), including the authority of the administrator under that section,
- **b)** The liability of 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 section 408(a) of the FCAA,
- **d)** The ability of EPA to obtain information from a source pursuant to section 114 of the FCAA, or
- **e)** The ability of the permitting authority to establish or revise requirements for the use of reasonably available control technology (RACT) as provided in chapter 252, Laws of 1993.

[Origin: WAC 173-401-640(4)]
[Authority: WAC 173-401-640(1)]

TABLE S.1 Requirements Determined Inapplicable or Exempt Unless Triggered by Action or Emission Increase

Note: The requirements listed in the following table include only those requirements for which inapplicability must be based on a determination or comparison of the size, age, emissions or other characteristic of an emission unit with respect to applicability criteria and threshold contained in the requirement. All other requirements are considered obviously inapplicable to the facility and are not included in the table below.

Requirement	Emissions Unit	Exempt or Inapplicable	Brief Description of Requirement	Basis
Conditions in the Synthetic Minor Order, issued May 1995	Facility	Rescinded	Limitations to establish facility as a synthetic minor source and limit styrene emissions to less than 10 tons per year.	In March 1999, Westport received conditional approval from ORCAA to increase the facility wide emission limit to above Title V thresholds.
Conditions contained in 09NOI682	EU7	Obsolete	Establish a spray area to apply topcoat in Building 7, Bay 7.	Temporary approval only- no longer effective.
WAC 173-400-040(3)(b)	Facility	Inapplicable	Emission unit identified as a significant contributor to non-attainment must use reasonable and available control methods to control emission of contaminants for which the area is designated non-attainment.	No emission units at the facility have been identified as a significant contributor to non-attainment.
WAC 173-400-040(8)(b)	Facility	Inapplicable	Fugitive dust sources identified as significant contributors to PM10 non-attainment must apply RACT.	The facility is not located in a PM10 non-attainment area.
WAC 173-400-100	Facility	Inapplicable	Registration required for listed sources, excluding sources subject to the operating permit program, after EPA grants	The facility is subject to the operating permit program.

Requirement	Emissions Unit	Exempt or Inapplicable	Brief Description of Requirement	Basis
			interim or final approval to the state program	
WAC 173-401-635	Facility	Inapplicable	No "affected source" as defined in WAC 173-401-200(1) shall be permitted as a temporary source [WAC 173-401-635].	WAC 173-401-635 provides that the permitting authority may issue a single AOP authorizing emissions from similar operations at multiple temporary locations, except for "affected sources." Since this permit is for a single location, this provision does not apply.
Chapter 173-435 WAC	Facility	Inapplicable	Emergency episode plan requirements	The facility has not been requested to prepare such a plan.
WAC 173-441-030	Facility	Inapplicable	GHG reporting requirements and related monitoring, recordkeeping, and reporting requirements.	The Facility's CO_2e PTE is less than the applicable threshold listed in WAC 173-441-030(1)(a) (ten thousand metric tons of CO_2e)
WAC 173-441-110	Facility	Inapplicable	Outlines fee information for reporting GHG emissions to Dept. of Ecology.	The Facility is not required to report under WAC 173-441-030(1)
Chapter 173-490 WAC	Facility	Inapplicable	Contains emission standards and controls for sources emitting volatile organic compounds (VOCs). Applies to certain source categories located in designated ozone non-attainment areas.	The facility does not meet the description of source categories covered by this regulation. Also, there are no designated ozone non-

Requirement	Emissions Unit	Exempt or Inapplicable	Brief Description of Requirement	Basis
				attainment areas in ORCAA's jurisdiction.
40 CFR Part 60 Subpart IIII: Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	EU11 EU12 EU13	Inapplicable	The requirements of 40 CFR Part 60 Subpart IIII (Subpart IIII) apply to new, modified, or reconstructed stationary compression ignition internal combustion engines that commenced construction after July 11, 2005 and manufactured after April 1, 2006. For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator.	EU13 and EU12 were ordered and installed prior to July 11, 2005. Therefore, both EU12 and EU13 are not subject to Subpart IIII. EU11 was ordered after July 11th, 2005 and was manufactured on February 26, 2006. Since EU11 was ordered after July 11, 2005 and was manufactured prior to April 1, 2006, Subpart IIII does not apply to EU11.
40 CFR Part 60 Subpart Dc: Industrial-Commercial-Institutional Steam Generating Units	EU15 EU16	Inapplicable	The requirements of 40 CFR Part 60, Subpart Dc (Subpart Dc) applies to steam generating units built after June 9, 1989 and having a maximum design heat input capacity of 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/hr)) or less, but greater than or equal to 2.9 MW (10 MMBtu/hr).	EU15 and EU16 are both less than 10 MMBtu/hr. Therefore, Subpart Dc does not apply to EU15 and EU16.

Requirement	Emissions Unit	Exempt or Inapplicable	Brief Description of Requirement	Basis
40 CFR Part 63 Subpart DDDDD: Industrial, Commercial and Institutional Boilers and Process Heaters	IEU3 IEU4 IEU6 IEU7 IEU8 IEU9 IEU10 IEU16	Inapplicable (IEU3,IEU4,IEU7,IEU9, and IEU10) Exempt (IEU6,IEU8, and IEU16)	Establishes requirements for all existing, new, or reconstructed industrial, commercial, or institutional boilers and process heaters located at a major source of HAPs.	IEU1 does not fall under the definition of a boiler or process heater; the combustion gases from the ovens come into contact with the process materials. IEU2,IEU4, IEU6, and IEU7 are used for space heating and do not fall under the definition of a boiler or process heater. IEU3,IEU5, and IEU8 meet the definition of a hot water heater. Hot water heaters are exempt from Subpart DDDDD per 40 CFR § 63.7491(d).
40 CFR Part 63 Subpart EEEE: Organic Liquids Distribution	Facility	Inapplicable	This subpart applies to organic liquid distribution (OLD) operations that are located at, or is part of, a major source of HAP emissions. An OLD operation means the combination of activities and equipment used to store or transfer organic liquids (non-gasoline) into, out of, or within a plant site regardless of the specific activity being performed. Activities include, but are not limited to, storage,	Westport used to have two tanks for resin storage, but they have since been permanently disabled. Subpart EEEE does not apply to Westport since Westport does not store or transfer any organic liquids that contain HAPs listed in Table 1 of this Subpart.

Requirement	Emissions Unit	Exempt or Inapplicable	Brief Description of Requirement	Basis
			transfer, blending, compounding, and packaging.	
40 CFR Part 63 Subpart JJ (Sections 63.803 – 63.808)	Facility	Exempt	National Emission Standards for Hazardous Air Pollutants: Wood Furniture Manufacturing Operations	40 CFR 63.800(a) exempts incidental furniture manufacturers from the provisions of this subpart, as long as usage records are maintained showing that the source meets the criteria of an incidental furniture manufacturer (<=100 gallons of finishing material or adhesives per month). Recordkeeping requirements are included in this permit.
40 CFR Part 63 Subpart JJJJ: Paper and Other Web Coating	Facility	Inapplicable	The provisions of this subpart apply to each new and existing facility that is a major source of HAP at which web coating lines are operated. Web coating line means any number of workstations, of which one or more applies a continuous layer of coating material across the entire width or any portion of the width of a web substrate, and any associated curing/drying equipment between an unwind	Westport applies polystyrene resin to a fiberglass web in its impregnator process. The resin saturates the fiberglass forming a saturated web that is immediately applied to the mold and rolled to remove air bubbles. The impregnator is defined as a nonatomized resin application method under 40 CFR Part 63 Subpart VVVV and is subject to subsequent requirements from Subpart VVVV. As Subpart JJJJ states

Requirement	Emissions Unit	Exempt or Inapplicable	Brief Description of Requirement	Basis
			or feed station and a rewind or cutting station.	that materials that are used to form a substrate are not included in the definition of “coating materials", the impregnator is not considered a web coating line under this NESHAP. Therefore, Westport is not subject to this NESHAP.
40 CFR Part 63 Subpart MMMM: Miscellaneous Metal Parts and Products Surface Coating	Facility	Inapplicable	This subpart establishes national emission standards for hazardous air pollutants (NESHAP) for miscellaneous metal parts and products surface coating facilities.	Westport does some powder coating of metal parts (e.g., port holes, grates, window frames, etc.). But Westport does not conduct any high performance, magnet wire, rubber-to-metal, or extreme performance fluoropolymer coating operations; therefore, Westport’s metal parts powder coating operations would fall under the “general use coating subcategory”. However, all metal parts coating conducted at Westport involves the surface coating of boats or metal parts of boats (including, but not limited to, the use of assembly adhesives) that meets the applicability criteria for Subpart VVVV (Boat

Requirement	Emissions Unit	Exempt or Inapplicable	Brief Description of Requirement	Basis
				Manufacturing). Therefore, miscellaneous metals parts and products surface coating operations are exempt from Subpart MMMM under 40 CFR § 63.3881(c)(15). In addition, Westport does not manufacture any personal watercraft (as defined by Subpart MMMM). Therefore, Westport is exempt from complying with Subpart MMMM, based on the exemption listed in 40 CFR § 63.3881(c)(15).
40 CFR Part 63 Subpart OOOO: Printing, Coating, and Dyeing of Fabrics and Other Textiles	Facility	Inapplicable	The source category to which this subpart applies is the printing, coating, slashing, dyeing or finishing of fabric and other textiles. This NESHAP specifies three subcategories to which the subpart applies: 1) coating and printing on fabric or other textiles; 2) slashing operations; and 3) dyeing and finishing fabric or other textiles.	The only activity Westport engages in that possibly could meet the definition of one of these activities is use of the impregnator that saturates a fiberglass web substrate with polystyrene resin. The impregnator does not involve any printing, slashing, or dyeing operations. The definition of fabric includes material made of fiberglass, natural fibers, synthetic fibers, or composite.

Requirement	Emissions Unit	Exempt or Inapplicable	Brief Description of Requirement	Basis
				The coating and printing subcategory includes any operation that coats or prints fabric or other textiles. Coating means the application of a semi-liquid coating material to one or both sides of a textile web substrate. Additionally, the definition of coating in Subpart OOOO does not include finishing where the fiber is impregnated with a chemical or resin to impart certain properties, and a solid film is not formed. Therefore, Westport's lamination activities do not fall under the coating subcategory of this subpart. Finishing means the chemical treatment of textiles (e.g. with resins) that improves the appearance and/or usefulness of the textile substrate. However, the definition of textiles does not include fiberglass. Therefore, Westport's impregnator operations are

Requirement	Emissions Unit	Exempt or Inapplicable	Brief Description of Requirement	Basis
				not included as an affected source to this subpart.
40 CFR Part 63 Subpart RRRR: Metal Furniture Surface Coating	Facility	Inapplicable	This subpart establishes requirements for metal furniture surface coating facilities. Surface coating is the application of coatings to a substrate using, for example, spray guns or dip tanks. Metal furniture means furniture or components of furniture constructed either entirely or partially from metal. However, surface coating of only small items such as knobs, hinges, or screws that have a wider use beyond metal furniture are not subject to this subpart unless the surface coating occurs at an affected metal furniture source.	Westport does not conduct metal furniture coating.
40 CFR Part 63 Subpart T: Halogenated Solvent Cleaning	Facility	Inapplicable	This subpart applies to each individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine that uses any solvent containing methylene chloride (CAS No. 75-09-2), perchloroethylene (CAS No. 127-18-4), trichloroethylene (CAS No. 79-01-6), 1,1,1-trichloroethane (CAS No. 71-55-	Westport does not operate a solvent cleaning machine. Therefore, Westport is not currently subject to Subpart T. If Westport does install a solvent cleaning machine, compliance Subpart T must be achieved immediately upon startup.

Requirement	Emissions Unit	Exempt or Inapplicable	Brief Description of Requirement	Basis
			6), carbon tetrachloride (CAS No. 56-23-5) or chloroform (CAS No. 67-66-3), or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent.	
40 CFR Part 63 Subpart WWWW	Facility	Inapplicable	National Emission Standards for Hazardous Air Pollutants: Reinforced Plastics Composites Production	40 CFR 63.5787(b) states that if a source is subject to 40 CFR Part 63 Subpart VVVV (Boat MACT) and all the reinforced plastics composites they manufacture are used in manufacturing their boats, they are not subject to this subpart. Westport is subject to the Boat MACT and uses reinforced plastics composites to only manufactures parts for their boats.
40 CFR Part 63 Subpart VVVV: Control Device Option (Sections 63.5701(c); 63.5704(c); 63.5715-63.5725; 63.5761(a)(5); 63.5764(d)&(e); 63.5767(d))	EU1 EU2 EU4 EU6 EU7	Inapplicable	National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing – Sections pertaining to the Control Device Option. [Also includes Section of Subpart A listed in Subpart VVVV Table 8 that apply only to units with control devices]	Westport does not have an add-on control device and therefore, is not subject to the provisions of the Control Device Option. If Westport would like to use this option in the future it would require a NOC and significant modification to their AOP.

Requirement	Emissions Unit	Exempt or Inapplicable	Brief Description of Requirement	Basis
40 CFR Part 63 Subpart VVVV: Aluminum Boat Standards (Sections 63.5743-63.5755; 63.5758(b)&(c); 63.5767(c)(2)&(3))	EU1 EU2 EU4 EU6 EU7	Inapplicable	National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing – Sections pertaining to standards for aluminum boat production.	Westport does not manufacture aluminum boats.
40 CFR Part 63 Subpart WWWW: Reinforced Plastics Composites Production	Facility	Inapplicable	Requirements for reinforced plastic composites production that is located at a major source of HAP emissions.	40 CFR § 63.5787 specifies that if your source is subject to 40 CFR Part 63, Subpart VVVV (Boat Building MACT), and all the reinforced plastic composites you manufacture are used in manufacturing your boats, you are not subject to this subpart. Westport exclusively produces reinforced plastic composites for the purpose of manufacturing boats and is therefore not subject to this subpart.
40 CFR Part 63 Subpart HHHHHH: Paint Stripping and Miscellaneous Surface Coating Operations	Facility	Inapplicable	Area sources of HAP emissions are subject to this subpart if the facility performs one or more of the activities listed in 40 CFR § 63.11170(a)	Westport is a major source of HAP; therefore, this NESHAP does not apply

Requirement	Emissions Unit	Exempt or Inapplicable	Brief Description of Requirement	Basis
40 CFR Part 63 Subpart XXXXXX: Metal Fabrication and Finishing Source Nine Categories	Facility	Inapplicable	Area sources of HAP are subject to this subpart if the source is primarily engaged in the operations in one of the nine source categories listed in 40 CFR § 63.11514(a).	Westport is a major source of HAP; therefore, this NESHAP does not apply
40 CFR Part 64	Facility	Inapplicable	Compliance Assurance Monitoring – Requires submittal of compliance assurance monitoring plans.	CAM does not apply to the facility as the emission units do not meet the applicability criteria in 40 CFR 64.2(a). Westport's emission units are only subject to an annual VOC emission limit and Westport uses no control devices to achieve compliance with that standard. Therefore, CAM does not apply.
40 CFR Part 68	Facility	Inapplicable	Risk Management Programs	40 CFR Part 68 applies to any facility that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR § 68.115. Westport does not use or store any materials above the threshold quantities listed in 40 CFR Part 68, except for storage of 30,000 gallons of propane. However, storage of propane

Requirement	Emissions Unit	Exempt or Inapplicable	Brief Description of Requirement	Basis
				is exempt from the requirements of this subpart, as it is a flammable substance that is listed in Tables 3 and 4 (40 CFR § 68.126)

[END OF SECTION]

Attachment 1: Insignificant Emission Units

IEU #	Building	IEU Name	Size/Capacity	Basis for IEU Designation
IEU1	Building 1	Powder Coating with filter/exhaust system that exhausts into the building	N/A	WAC 173-401-530(4)
IEU2	Building 1	Propane Adams Burner (used by evaporator)	100,000 Btu/hr	WAC 173-401-533(2)(e)
IEU3	Building 1	Propane Space heater	310,000 Btu/hr	WAC 173-401-533(2)(r) (see Table 5.3.1)
IEU4	Building 1	Powder Coating Ovens (2 units)	0.73 MMBtu 0.5 MMBtu	WAC 173-401-530(4) (see Table 5.3.1)
IEU5	Building 2	3-sided grinding booth that vents inside	N/A	WAC 173-401-530(4)
IEU6	Building 2	Propane Boiler (4 identical units)	310,000 Btu/hr	WAC 173-401-533(2)(e) (see Table 5.3.1)
IEU7	Building 3	Propane space heater	97,000 Btu/hr	WAC 173-401-533(2)(r) (see Table 5.3.1)
IEU8	Building 4	Propane boiler (2 units)	310,000 Btu/hr	WAC 173-401-533(2)(e) (see Table 5.3.1)
IEU9	Building 4	Propane space heater	250,000 Btu/hr	WAC 173-401-533(2)(r) (see Table 5.3.1)
IEU10	Building 5	Propane space heaters for booth (2 units)	1.25 MMBtu/hr	WAC 173-401-533(2)(r) (see Table 5.3.1)
IEU11	Building 5	Diesel storage for generator	55 gallons	WAC 173-401-533(2)(c)
IEU12	Building 7	Machine Shop	N/A	WAC 173-401-530(4)
IEU13	Building 7	Propane Storage	30,000 gallons	WAC 173-401-533(2)(d)
IEU14	Building 7	Diesel storage for generator	4,000 gallons	WAC 173-401-533(2)(c)
IEU15	Building 7 Annex – Metal Working	Machine Shop (IEU) (center of 1st floor) used for constructing hydraulic components,	N/A	WAC 173-401-530(4)

		fabricating manifolds, pumps, etc. minimal emissions.		
IEU16	Building 9	Propane Boilers (9 units)	310,000 Btu/hr	WAC 173-401-533(2)(e) (see Table 5.3.1)
IEU17	Building 9	Acetone Still	30 gallons	WAC 173-401-533(2)(o)
IEU18	N/A	Roll-applying corrosion control coating to I-beam trailers	Less than 40 gallons/year	WAC 173-401-530(4)

Attachment 2: Summary of Calculation Method Specified in 40 CFR Part 63 Subpart VVVV for Monitoring Compliance with the Open Molding Emission Limit of Condition AR1.1a.

1. Determine which compliance option will be used (emissions averaging option or compliant materials option) for each of the five open molding operations (production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat).
2. Use the methods described in Attachment 3 to determine the organic HAP content of resins and gelcoats.
3. Calculate the organic HAP limit using the calculation specified in below.

   HAP Limit = $[46(M_R)+159(M_{PG})+291(M_{CG})+54(M_{TR})+214(M_{TG})]$, where:

   HAP Limit = total allowable organic HAP that can be emitted from open molding operations, kilograms.
   M_R= mass of production resin used in the past 12 months, excluding any materials exempt under Section a) through c) of Condition AR1.1a, in megagrams.
   M_{PG}= mass of pigmented gel coat used in the past 12 months, excluding any materials exempt under Section a) through c) of Condition AR1.1a, in megagrams.
   M_{CG}= mass of clear gel coat used in the past 12 months, excluding any materials exempt under Section a) through c) of Condition AR1.1a, in megagrams.
   M_{TR}= mass of tooling resin used in the past 12 months, excluding any materials exempt under Section a) through c) of Condition AR1.1a, in megagrams.
   M_{TG}= mass of tooling gel used in the past 12 months, excluding any materials exempt under Section a) through c) of Condition AR1.1a, in megagrams.

4. If the Permittee elects to use the maximum achievable control technology (MACT) model point value averaging compliance option, then calculate the (MACT) model point value for each resin and gel coat used in each of the past 12 months using the calculations specified in a and b of this section. If the Permittee elects to use the compliant materials option, then go directly to step 5.
   a. Using the formulas in Table A2.1, calculate the MACT model point value (PV_i) for each resin and gel coat used in each operation in the past 12 months.

TABLE A2.1: Model Point Value Formulas for Open Molding Operations

For this operation	And this application method	Use this formula to calculate the MACT model point value
Production resin Tooling resin	Atomized	$0.014 \times (\text{Resin HAP\%})^{2.425}$
	Atomized, plus vacuum bagging with roll-out	$0.01185 \times (\text{Resin HAP\%})^{2.425}$

	Atomized, plus vacuum bagging without roll-out	0.00945 x (Resin HAP%)$^{2.425}$
	Nonatomized	0.014 x (Resin HAP%)$^{2.275}$
	Nonatomized, plus vacuum bagging with roll-out	0.0110 x (Resin HAP%)$^{2.275}$
	Nonatomized, plus vacuum bagging without roll-out	0.0076 x (Resin HAP%)$^{2.275}$
Pigmented gel coat Clear gel coat Tooling gel coat	All methods	0.445 x (Gel coat HAP%)$^{1.675}$

b. Calculate the weighted-average MACT model point value for each operation included in the average. To use filled resins in this calculation, use the value of PV_F calculated in section (6)(b) for PV_i below.

$$PV_{OP} = \frac{\sum_{i=1}^{n}(M_i PV_i)}{\sum_{i=1}^{n}(M_i)}, \text{ where}$$

PV_{OP}=weight weighted-average MACT model point value for each open molding operation (PV_R, PV_{PG}, PV_{CG}, PV_{TR}, and PV_{TG})

M_i=mass of resin or gel coat i used within an operation in the past 12 months, megagrams.
n=number of different open molding resins and gel coats used within an operation in the past 12 months.
PV_i= the MACT model point value for resin or gel coat used within an operation in the past 12 months, kilograms of HAP per megagram of material applied.

c. Calculate the total organic HAP emissions for all operations included in the average using the equation below. If the organic HAP emissions are less than the organic HAP limit calculated in section (3) for the same 12-month period and operations, then the Permittee is in compliance with the emission limit in Condition AR1.1a for those operations and materials included in the average.

HAP emissions = [(PV_R)(M_R)+ (PV_{PG}) (M_{PG})+ (PV_{CG}) (M_{CG})+ (PV_{TR}) (M_{TR})+ (PV_{TG}) (M_{TG})], where:

HAP emissions = organic HAP emissions calculated using MACT model point values for each operation included in the average, kilograms.

PV_R = weighted-average MACT model point value for production resin used in the past 12 months, kilogram per megagram.
M_R = mass of production resin used in the past 12 months, megagrams.
PV_{PG} = weighted-average MACT model point value for pigmented gel coat used in the past 12 months, kilogram per megagram.
M_{PG} = mass of pigmented gel coat used in the past 12 months, megagrams.
PV_{CG} = weighted-average MACT model point value for clear gel coat used in the past 12 months, kilogram per megagram.
M_{CG} = mass of clear gel coat used in the past 12 months, megagrams.
PV_{TR} = weighted-average MACT model point value for tooling resin used in the past 12 months, kilogram per megagram.
M_{TR} = mass of tooling resin used in the past 12 months, megagrams.
PV_{TG} = weighted-average MACT model point value for tooling gel coat used in the past 12 months, kilogram per megagram.
M_{TG} = mass of tooling gel coat used in the past 12 months, megagrams.

5. If the Permittee elects to use the compliant materials option, then complete the following calculations to show that the weighted-average organic HAP content does not exceed the limit specified in Table A2.2 for each operation not included in the emission average in section (3). For filled resins, you must demonstrate compliance as specified in section (5).

TABLE A2.2 Alternative Organic HAP Content Requirements for Open Molding Resin and Gel Coat Operations

For this operation	And this application method	You must not exceed this weighted-average organic HAP content (weight %)
Production resin operations	Atomized (spray)	28 %
	Nonatomized (nonspray)	35 %
Pigmented gel coat operations	Any method	33 %
Clear gel coat operations	Any method	48 %
Tooling resin operations	Atomized (spray)	30 %
	Nonatomized (nonspray)	39%
Tooling gel coat operations	Any method	40%

a. Except for filled resins, if all resins and gel coats used in an operation have organic HAP contents no greater than the applicable organic HAP content limits in Table A2.2, then the Permittee is in compliance with the emission limit in Condition AR1.1a for that 12-month period for that operation. The Permittee does not need to complete the weighted-average organic HAP content calculation in section (5)(b) for that operation.
b. For all other operations the Permittee shall calculate the weighted-average organic HAP content for all resins and gel coats used in that operation in the past

12 months. If the weighted-average organic HAP content does not exceed the applicable organic HAP content limit in Table A2.2, then the Permittee is in compliance with the emission limit in Condition AR1.1a for that 12-month period for that operation.

$$\text{Weighted} - \text{Average HAP Content (\%)} = \frac{\sum_{i=1}^{n}(M_i HAP_i)}{\sum_{i=1}^{n}(M_i)}, \text{ where}$$

M_i= mass of open molding resin or gel coat i used in the past 12 months in an operation, megagrams.

HAP_i= organic HAP content, by weight percent, of open molding resin or gel coat i used in the past 12 months in an operation.

n= number of different open molding resins or gel coats used in the past 12 months in an operation.

6. For filled production and tooling resins, compliance must be demonstrated on an as-applied basis.
    a. For each filled production or tooling resin used, use Table A2.3 to calculate the MACT model point value for the neat (unfilled) resin, before filler is added.
    b. Calculate the as-applied MACT model point value for each filled production or tooling resin used.

$$PV_F = PV_u \times \frac{(100 - \%Filler)}{100}, \text{ where}$$

PV_F= the as-applied MACT model point value for a filled production resin or tooling resin, kilograms organic HAP per megagram of filled material.
PV_u = the MACT model point value for the neat (unfilled) resin, before filled is added, as calculated using the formulas in section (4)(a)
$\%Filler$= the weight-percent of filler in the as-applied filled resin system.

    c. If the as-applied MACT model point value does not exceed the applicable organic HAP content limits below, then the filled resin is in compliance. (Note: You may also demonstrate compliance for filled resins by using the calculated value of PV_F in the emissions averaging option in section (4).)

TABLE A2.3 As-Applied Organic HAP Content Requirements for Filled Resins

For this material	You must not exceed this as-applied MACT model point value (kilograms of organic HAP per megagram of filled resin applied)
Filled production resin	46
Filled tooling resin	54

[Origin: 40 CFR § 63.5698(b); 40 CFR § 63.5701(a) & (b); 40 CFR § 63.5704(a) & (b); 40 CFR § 63.5710; 40 CFR § 63.5713; 40 CFR § 63.5714; Table 2 to Subpart VVVV of Part 63; Table 3 to Subpart VVVV of Part 63]

Attachment 3: Summary of Methods Specified in 40 CFR Part 63 Subpart VVVV for Determining the Organic HAP Content of Materials

1. *Method 311 (appendix A to 40 CFR Part 63*) as specified in 40 CFR § 63.5758(a)(1)(i)-(ii).
2. *ASTM D1259-85 (Standard Test Method for Nonvolatile Content of Resins)*.
3. *Alternative Method*. You may use an alternative test method if you obtain prior approval by EPA. You must follow the procedures in 40 CFR § 63.7(f) to submit an alternative test method for approval.
4. *Information from supplier or manufacturer of the material*. You may rely on information other than that generated by the test methods above, such as manufacturer's formulation data, according to the following:
    a. Include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is 0.5 percent of the material used by mass, you do not have to include it in the organic HAP total.
    b. If the organic HAP content is provided by the material supplier or manufacturer as a range, then you must use the upper limit of the range for determining compliance. If a separate measurement of the total organic HAP content using the methods listed in (1) through (3) exceeds the upper limit of the range of total organic HAP content provided by the material supplier or manufacturer, then you must use the measured organic HAP content to determine compliance.
    c. If the organic HAP content is provided as a single value, you may assume the value is a manufacturing target value and actual organic HAP content may vary from the target value. If a separate measurement of total organic HAP content using the methods listed in (1) through (3) is less than 2 percentage points higher than the value for total organic HAP content provided by the material supplier or manufacturer, then you may use the provided value to demonstrate compliance. If the measured total organic HAP content exceeds the provided value by 2 percentage points or more, then you must use the measured organic HAP content to determine compliance.
5. *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 the tables below. You may use Table A3.1 only if the solvent blends in the materials you use do not match any solvent blends in Table A3.2 and you know only whether the blend is either aliphatic or aromatic. However, if test results indicate higher values than those listed in the tables, then the test results must be used for determining compliance.

TABLE A3.1 Default Organic HAP Contents of Solvents and Solvent Blends

Solvent/solvent blend	CAS No.	Average organic HAP content, % by mass	Typical organic HAP, % by mass
Aliphatic 140		0	None.
Aromatic 100		2	1% xylene, 1% cumene
Aromatic 150		9	Naphthalene
Aromatic naptha	64742-95-6	2	1% xylene, 1% cumene
Aromatic solvent	64742-94-5	10	Naphthalene
Ethylbenzene	100-41-4	100	Ethylbenzene
Exempt mineral spirits	8032-32-4	0	None
Hexane	110-54-3	50	n-hexane
n-hexane	110-54-3	100	n-hexane
Hydrotreated light distillate	64742-47-8	0.1	Toluene
Hydrotreated naptha	64742-48-9	0	None
Lactol spirits	64742-89-6	15	Toluene
Ligroines (VM & P)	8032-32-4	0	None
Low aromatic white spirit	64742-82-1	0	None
Mineral spirits	64742-88-7	1	Xylenes
Petroleum distillate mixture	68477-31-6	8	4% naphthalene, 4% biphenyl
Stoddard solvent	8052-41-3	1	Xylenes
Super high-flash naphtha	64742-95-6	5	Xylenes
Toluene	108-88-3	100	Toluene
Varol® solvent	8052-49-3	1	0.5% xylenes, 0.5% ethyl benzene
VM & P naphtha	64742-89-8	6	3% toluene, 3% xylene
Xylene(s)	1330-20-7	100	Xylenes, ethylbenzene

TABLE A3.2 Default Organic HAP Contents of Petroleum Solvent Groups

Solvent group type	Average organic HAP content, % by mass	Typical organic HAP, % by mass
Aliphatic (Mineral spirits 135, Mineral spirits 150 EC, Naphtha, Mixed Hydrocarbon, Aliphatic Hydrocarbon, Aliphatic Naptha, Naphthol Spirits, Petroleum Spirits, Petroleum Oil, Petroleum Naphtha, Solvent Naphtha, Solvent Blend)	3	1% xylene, 1% toluene, 1% ethyl benzene
Aromatic (Medium-flash Naphtha, High-flash Naphtha, Aromatic Naphtha, Light Aromatic Naphtha, Light Aromatic Hydrocarbons, Aromatic Hydrocarbons, Light Aromatic Solvent)	6	4% xylene, 1% toluene, and 1% ethylbenzene

Attachment 4: Data Summary

Name: Westport LLC

Physical address: 1807 N. Nyhus
Westport, WA 98595

County: Grays Harbor County

Primary Contact: Michele Pettit

Contact phone number: (360) 452-5095

Air Operation Permit #: 14AOP1029

EIS #: 7503111

FRS #: 110000490736
ICIS-AIR #: WAORC0005302700701
Type of ownership: Private

Operating status: Operating

NAICS code: 336612

SIC code(s): 3732

Air program(s): MACT Part 63, SIP, Title V

Federal Regulations: 40 CFR Part 63, Subpart II
40 CFR Part 63, Subpart VVVV
40 CFR Part 63, Subpart ZZZZ
40 CFR Part 63, Subpart DDDDD
40 CFR Part 63, Subpart A

Major for which pollutant(s)? Styrene

Class: Major

[END OF SECTION]