
TECHNICAL SUPPORT DOCUMENT (TSD)
AND
STATEMENT OF BASIS

WESTPORT SHIPYARD, INC.
1807 Nyhus Street
Westport, Washington 98595

Associated with Air Operating
Permit No. 07NOC575

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TABLE OF CONTENTS

Sections

1.0 Disclaimer.....	1
2.0 Process Descriptions.....	2
3.0 Emission Unit Summary.....	8
4.0 Actual Emissions 2008.....	10
5.0 Regulatory Determinations.....	11
6.0 Notices of Construction.....	28
7.0 Statement of Basis Table.....	44

Tables

Table 3.1 Emission Unit Summary.....	9
Table 3.2 Insignificant Emission Units.....	9
Table 4.1 2008 Actual Emissions.....	10
Table 5.1 Status of Section 9 Conditions.....	12
Table 5.2 Applicability Summary for 40 CFR Part 63 Subpart VVVV.....	13
Table 5.3 Summary of Applicability of 40 CFR Part 63 Subpart A.....	17
Table 5.4 Summary of Air Compliance History.....	27
Table 6.1 Summary of Air Regulatory History.....	28
Table 7.1 Statement of Basis.....	44

1.0 DISCLAIMER

Information contained in this Technical Support Document and Statement of Basis is for purposes of background information only and is not enforceable. Applicable requirements including emission limits and monitoring, recordkeeping and reporting requirements are contained in Westport Shipyard's Air Operating Permit (AOP).

2.0 PROCESS DESCRIPTIONS

2.1 Overview

Westport Shipyard Inc. is located on Nyhus Street near the Westport Marina, in Westport, Washington. The Westport Shipyard facility manufactures yachts and other large marine vessels using fiberglass reinforced plastics.

Westport Shipyard was in existence as a yacht manufacturing facility at this location prior to 1980 and has been registered as an air pollutant source with ORCAA since 1990. In 1995, Westport Shipyard received conditional approval to construct a spray booth for boat finishing operations and requested a voluntary limit on emissions in order to opt out of the Air Operating Permit program. In June 1998 Westport Shipyard conducted a facility source test that showed that styrene emissions had been previously underestimated. This, in addition to expected sales growth, caused Westport Shipyard to request approval to exceed their 10 TPY styrene emission limit. Westport Shipyard received a new emission limit in March 1999 as well as approval to install additional exhaust/ventilation systems on their main lamination buildings.

2.2 Raw Materials and Fuels

The primary raw materials and fuels used by Westport Shipyard in the fabrication of yachts and hulls are polyester resin, methyl ethyl ketone peroxide, gelcoat, paints and solvents, lumber, metal parts, diesel and propane.

Polyester resins are used in the fiberglass-reinforced plastic processes. Westport Shipyard used approximately 299 tons of polyester resins in 2008 and has an on-site resin storage capacity of approximately 290 tons. Bulk resin is stored in two on-site storage tanks (one 62,000 gallon tank and one 3,000 gallon tank). Styrene emissions result from the use of polyester resins and is classified as a toxic air pollutant (TAP) per Washington's Air Toxics Regulation (CAS No. 100-42-5) and a hazardous air pollutant (HAP) listed in Section 112 of the Federal Clean Air Act.

Methyl ethyl ketone peroxide (MEKP) is used as a catalyst in the fiberglass-reinforced plastic processes. MEKP is purchased in solution with methyl ethyl ketone. The solution is stored in plastic storage bins outside Buildings 2 and 9. Both MEKP and methyl ethyl ketone are classified as TAPs per Washington's Air Toxic Regulations (CAS No. 1338-23-4 and CAS No. 78-93-3, respectively).

Gelcoat is used on the yacht molds prior to the fiberglass-reinforced resin process. Approximately 13.4 tons of gelcoat were used in 2008 and Westport Shipyard has an on-site storage capacity of approximately 1000 pounds. Gelcoat is stored in 55 gallon drums. Styrene emissions result from gelcoat usage.

A variety of paints and solvents are used throughout the facility. Westport Shipyard used approximately 4452 gallons of paints and 11,906 gallons of solvents in 2008. Emissions from paints and solvents include volatile organic compounds and various toxic air pollutants.

Acetone is the primary solvent used. Approximately 9680 gallons of acetone were used in 2008.

Acetone is stored in 55 gallon drums and is used for cleaning.

Westport also manufactures furniture components for the interior of the yachts. Part of the manufacturing process involves application of a finish coating. In 2008 Westport used about 368 gallons of lacquer and about 69 gallons of reducer/thinner.

Nitric acid is used in the powder coating operation to clean and etch the metal parts. Nitric acid is classified as a TAP per Washington's Air Toxics Regulation (CAS No. 7697-37-2).

Lumber and unfinished metal parts are used in the construction of structural hull components, bulkheads, and other yacht components.

Fuel used at the facility includes diesel and propane.

Diesel is used as fuel for a boiler and two emergency generators. The boiler uses a 4000-gallon storage tank, located near Building #7. There are two storage tanks for the emergency generators: a 400 gallon tank near Building #7, a 55 gallon tank near Building #5, and a 500 gallon tank near Building #9. Westport Shipyard uses approximately 33,000 gallons of diesel annually. Diesel storage is considered an insignificant emission unit per WAC 173-401-533(2)(c).

Propane is stored in eight storage tanks located throughout the site: four 500-gallon tanks on the east side of the Building #3, two 1000-gallon tanks on the west side of Building #1, a 1000-gallon tank on the north side of Building #4, and a 500-gallon tank on the east side of Building #4. Westport Shipyard uses approximately 68,000 gallons of propane annually. Propane storage is considered an insignificant emission unit per WAC 173-401-533(2)(d).

2.3 Lamination Operations

Location:

Building #2	Small parts lamination
Building #4	Mold storage and large parts lamination
Building #7	Secondary lamination
Building #9	Large parts lamination (hulls, decks, bridges, etc.)

Building #2

Small parts are laminated in Building #2. Building #2 operations result in VOC and particulate emissions from application of VOC-containing materials such as resins, gelcoats, core material, and adhesives. Spray or hand application techniques as well as an infusion process are used to apply these materials. Building #2 is equipped with a 30,000 acfm ventilation system that exhausts through three 46-foot vertical stacks.

There are two enclosed and filtered booths in Building #2 used for application of primers and topcoats and two enclosed and filtered booths used for part preparation. Part preparation involves sanding and grinding the small parts as well as application of fairing compounds.

Building #4

Large mold parts are repaired, laminated and assembled in Building #4. This area is also used for mold storage. Operations in Building #4 result in VOC and particulate emission. VOC emissions result from use of VOC-containing materials such as resins, gelcoats, and adhesives. Particulate

matter results from cutting core material and from spray application of resins and gelcoats. Spray or hand application techniques as well as an infusion process are used to apply these materials.

Building #7

Building #7 is used to assemble the yachts. Combining the hull, decks, bridges, and small parts of the yachts involves some secondary lamination. Only hand lay-up techniques are used to assemble the parts.

Building #9

In Building #9 yacht hulls, decks and bulkheads are fabricated using hand lay-up lamination and spray application techniques. Yacht hulls and decks are made by building the part on the inside of a mold.

To form the smooth outside surface of the hull, gelcoat is applied to the mold using conventional spray application techniques. After the gelcoat is applied, the composite structure is built-up by applying successive layers of fiberglass reinforced resin using an impregnator. The impregnator is a piece of equipment mounted on an overhead crane that continuously feeds a sheet of fiberglass-woven material into a reservoir of resin and then onto the surface of the mold. The fiberglass-woven material becomes saturated or “impregnated” with resin as it is pulled through the reservoir. The resin-saturated fiberglass is gently lowered onto the composite surface as the impregnator travels on the crane over the length of the mold. Immediately after the resin-saturated fiberglass sheet comes into contact with the mold, surface rollers are used to mechanically force air bubbles out of the composite. Core foam material is secured to the hull with putty then covered with resin and fiberglass.

The lamination process results in emissions of VOC from the use of resin and other VOC-containing materials. The predominant volatile compound emitted is styrene. Particulate emissions are created during grinding and sanding processes. Emissions are captured and exhausted through an exhaust/ventilation system.

Construction of Building #9 began in 2007 and was completed in 2008. Building #9 includes four exhaust units each rated at 7,000 acfm. Air intakes are connected to mobile ducting to allow them to be moved to specific locations to enhance capture of VOC and particulate. The air intake registers are equipped with high efficiency (95% plus particulate removal efficiency) dry filters to remove particulate prior to exhaust. In situations where lamination operations are taking place in multiple locations, exhaust intake registers are directed to areas of highest concentrations. While spraying resin and gel coat, exhaust intake registers are located on the inside of the hull to optimize VOC capture.

Occasionally, molds (also known as "plugs") are fabricated in Building #9. Plugs are made by forming a fiberglass/resin composite on a foam male mold. The foam molds are purchased by Westport Shipyard from an off-site manufacturer. The fiberglass/resin composite is built-up on the foam mold using spray lay-up lamination techniques.

2.4 Spray Painting & Finishing Operations

Location:

Building #1	Powder coating
Building #3	Waterwall paint booth

Building #4	Surface coating
Building #5	Paint booth
Building #7	Surface coating
Building #7 Annex	Paint booth

Building #1

Powder coating in Building #1 consists of three separate operations: nitric acid rinse tank, spray booth, and oven. Emissions from the operations are below the PQL, therefore, they are considered an insignificant emission unit per WAC 173-401-530(4).

- The nitric acid rinse tank is 540 gallons and contains a solution of 10% nitric acid and Safeguard 6500 (Amine base detergent). The rinse is used to clean and etch the metal parts before coating.
- Powder coating is conducted in a spray booth that contains filters. The metal part is electrically charged and the powder coating applied using spray techniques. The three-sided booth is 10 feet x 10 feet x 7 feet.
- After coating, the metal pieces are cured in a propane-fired oven. The oven is rated at 0.4 MMBtu/hr.

Building #3

Building #3 contains a fully enclosed waterwall paint booth for spray coating small parts. The operation uses less than 2 gallons of surface coating material per day, therefore it is considered an insignificant emission unit per WAC 173-401-533(q).

Building #5

Building #5 is a fully enclosed paint spray booth used for spray-painting yachts. The 50-foot by 125-foot booth was permitted under NOC# 657 and constructed in 1995. High transfer efficiency coating techniques are used and spray booth air is filtered prior to exhaust to remove particulate. There are two 50-foot stacks with an air flowrate of 18,000 dscfm each.

Some surface coating is also conducted in Buildings #2 and #7. With the exception of primer application, all surface coating is hand-applied. Primer is applied using HVLP spray guns and by hand in the south bay of Building #7.

Building #7 Annex

Building #7 Annex contains a 30' by 20' spray booth. The spray booth is used to spray apply surface coatings to the wood components to be installed inside the yachts.

2.5 Wood Working Operations

Location:

Building #7 Annex Wood Shop

The Building #7 Annex wood shop is used for building and assembly of wooden components. The operation includes a dust collection system with a baghouse that filters air before being returned to the shop. Emissions from cutting and sanding the wood is controlled by a 7,000 acfm pulse-jet baghouse. This cabinet shop is considered an insignificant emission unit per WAC 173-401-532(55).

2.6 Space Heating Operations

Location:

Building #7	Diesel boiler (there is one (1) 140,000 btu/hr boiler)
Building #2	Propane boilers (there are four (4) 310,000 btu/hr boilers)
Building #4	Propane boiler (there are two (2) 200,000 btu/hr boilers)
Building #9	Propane boilers (there are nine (9) 310,000 btu/hr boilers)

Building #1	Propane space heaters
Building #3	Propane space heaters
Building #4	Propane space heaters
Building #6	Propane space heaters
Building #5	Propane air preheater

Westport Shipyard operates 15 small boilers and various heaters for space heating.

The diesel boiler is located in a shed next to Building #7 and is used for heating Building #7. The boiler is rated at 0.14 MMBtu/hr. The diesel boiler is considered an insignificant emission unit per WAC 173-401-533(2)(g).

Four propane boilers are located in Building #2 and are used for heating Building #2. The boilers are rated at 0.31 MMBtu/hr each. Two 0.31 MMBtu/hr propane boilers are located in Building #4 and are used solely for space heating. There are nine (9) propane boilers in Building #9 used for space heating, and each boiler is rated at 0.31 MMBtu/hr. The propane boilers are considered insignificant emission units per WAC 173-401-533(2)(e).

Propane heaters are located in Buildings #1 - #6 and are considered insignificant emission units per WAC 173-401-533(2)(r).

2.7 Assembly

Location:

Building #7	Assembly
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Building #7 has been used primarily for assembly operations. Assembly operations involve piecing together the major yacht components that have been fabricated elsewhere at the facility. Assembly operations result in minor pollutant emissions rates compared to hull or deck fabrication due to the smaller amounts of VOC-containing materials used during assembly.

Building #7 is not equipped with an exhaust/ventilation system.

2.8 Maintenance and Miscellaneous Activities

Location:

Building #7 Annex	Welding
Building #9	Acetone Still
Building #7	Emergency Diesel Generator
Building #5	Emergency Diesel Generator
Building #9	Emergency Diesel Generator

Welding and metal polishing also occurs in Building #7. The welding process uses less than 20 pounds of welding wire per day and uses inert gas to shield the weld from oxygen. Welding is considered an insignificant emission unit per WAC 1730-401-533(2)(i). Metal polishing of stainless steel parts is considered an insignificant emission unit per WAC 173-401-532(14).

There is one acetone stills used to concentrate and recycle acetone. The still has a capacity of 30 gallons per batch and is considered an insignificant emission unit per WAC 173-401-533(2)(o).

There are three emergency diesel generators located on-site. The generator near Building #7 is 643-hp and is considered an insignificant emission unit per WAC 173-401-530(4). The generator near Building #5 is 330-hp and is considered an insignificant emission unit per WAC 173-401-530(4). The generator in Building #9 is 717-hp and is an insignificant emission unit per WAC 173-401-530(4).

Other miscellaneous emissions at the facility encompass a wide range of units and activities, including but not limited to metalworking, rough and finished lumber storage, and various paved and unpaved roads and parking lots.

3.0 EMISSION UNIT SUMMARY

3.1 LAMINATION AND PLUG FABRICATION (EU1)

The lamination of hulls, decks, bulkheads and fabrication of plugs in Building #9 and lamination of small parts in Building #2 are designated as emission unit #1 (EU1). EU1 consists of spray application, hand lay-up, and impregnation lamination controlled by a ventilation system equipped with filters. Expansion of the lamination process was permitted in 1999 under NOC# 98NOC049. Construction of Building #9 was approved through NOC 07NOC554.

The lamination process is subject to the conditions in NOC# 98NOC049 Order of Approval and the general requirements under chapter 173-400 WAC and ORCAA Regulations. The Order of Approval included a plant-wide emission limit and material usage and emissions recordkeeping. The emission limit was increased in 08NOC627 from 32 tons per year of VOC to 40 tons per year.

3.2 SPRAY PAINTING (EU2)

The spray painting activities in Building #5, Building #2, and Building #7 are designated as emission unit #2 (EU2).

Installation of the spray booth in Building #5 was permitted in 1995 under NOC# 657. Installation of the spray booths in Building #7 was permitted in 2006 under 06NOC462. The installation of the spray booths in Building #2 was permitted in 2008 under 08NOC598.

The spray painting process is subject to the conditions in NOC#657 Order of Approval, 06NOC462 Order of Approval, and 08NOC598 Order of Approval and the general requirements under chapter 173-400 WAC and ORCAA Regulations. The Order of Approvals include requirements to filter exhaust and have an Operation and Maintenance Plan.

TABLE 3.1 EMISSION UNIT SUMMARY

Emission Unit #	Description	Control Equipment/Techniques	NOC
EU1 Lamination and Plug Fabrication (Buildings #2 & #9)	<ul style="list-style-type: none"> Lamination of hulls, decks, and bulkheads - Impregnators - Spray application - Flow coating 	<ul style="list-style-type: none"> Ventilation system - 4 exhaust units - 7,000 ACFM each 	01MOD181 (5/14/2003)
	<ul style="list-style-type: none"> Fabrication of plugs - Impregnators - Spray application - Flow coating 		07NOC554 (1/25/2008)
	<ul style="list-style-type: none"> Small parts lamination - Spray application - Flow coating 		08NOC630 (10/23/2008)
EU2 Spray Painting (Building #5)	<ul style="list-style-type: none"> Spray application of paints 	<ul style="list-style-type: none"> Spray booth 	657 (7/19/95)

TABLE 3.2 INSIGNIFICANT EMISSIONS UNITS:

Process	IEU Name	Size/Capacity	Basis for IEU Designation
Space heating	Building #7 Diesel boiler	140,000 Btu/hr	WAC 173-401-533(2)(g)
	Building #2 Propane boiler (4 identical units)	310,000 Btu/hr	WAC 173-401-533(2)(e)
	Building #9 Propane boilers (9 identical units)	310,000 Btu/hr	WAC 173-401-533(2)(e)
	Building #4 Propane boiler	200,000 Btu/hr	WAC 173-401-533(2)(e)
	Building #1 Propane space heaters	310,000 Btu/hr	WAC 173-401-533(2)(f)
	Building #3 Propane space heaters	310,000 Btu/hr	WAC 173-401-533(2)(f)
	Building #4 Propane space heaters	310,000 Btu/hr	WAC 173-401-533(2)(f)
	Building #5 Propane air preheater	310,000 Btu/hr	WAC 173-401-533(2)(f)
	Building #6 Propane space heaters	310,000 Btu/hr	WAC 173-401-533(2)(f)
	Diesel storage (boiler)	4000 gallons	WAC 173-401-533(2)(c)
Powder coating	Propane storage (Building #7)	30,000 gallons	WAC 173-401-533(2)(d)
	Nitric acid rinse tank	Emissions below PQL	WAC 173-401-530(4)
	Spray booth	Emissions below PQL	WAC 173-401-530(4)
Woodworking	Oven (2 units)	Emissions below PQL	WAC 173-401-530(4)
	Building #2 cabinet shop		WAC 173-401-532(55)
Spray painting	Building #7 cabinet shop		WAC 173-401-532(55)
	Waterwall paint booth (Building #3)	<2 gallons per day	WAC 173-401-533(q)
Miscellaneous	Welding (Building #7)		WAC 173-401-533(2)(i)
	Metal polishing		WAC 173-401-532(14)
	Acetone still	30 gallons/batch	WAC 173-401-533(2)(o)
	Emergency diesel generator (Bldg #7)	643 hp	WAC 173-401-530(4)
	Emergency diesel generator (Bldg #5)	330 hp	WAC 173-401-530(4)
	Emergency diesel generator (Bldg #9)	717 hp	WAC 173-401-530(4)
	Diesel storage (Bldg #7 generator)	400 gallons	WAC 173-401-533(2)(c)
	Diesel storage (Bldg #5 generator)	55 gallons	WAC 173-401-533(2)(c)
	Lumber storage		WAC 173-401-530(1)(d)
	Resin Storage Tank #1	62,000 gallons	WAC 173-401-533(2)(t)
	Resin Storage Tank #2	3,000 gallons	WAC 173-401-533(2)(t)
Paved/unpaved road dust		WAC 173-401-530(1)(d)	

4.0 ACTUAL EMISSIONS 2008

TABLE 4.1 2008 ACTUAL EMISSIONS¹

Pollutant	2008 Emissions (tons)	Estimate Basis
Volatile Organic Compounds (VOC)	30.2	See below
Total HAPs ²	15.5	
Total TAPs ³	20.4	
Acetone	4.8	EPA factor
N-Butyl acetate	0.76	Material balance
Butyl alcohol	0.27	Material balance
Ethyl acetate	0.13	Material balance
Ethyl benzene*	0.12	Material balance
Isopropanol	0.13	EPA factor
Methyl ethyl ketone	0.61	EPA factor
Styrene*	12.6	NMMA, CFA, and source test emission factors
Toluene*	1.66	Material balance
Xylene*	0.49	Material balance
Other TAPs ⁴	0.1	Material balance

¹Annual emissions will vary from year to year based on operational conditions at the facility. Data presented above were summarized from the 2008 Annual Emission Inventory submitted to ORCAA in Spring 2009.

²HAP designates a hazardous air pollutant pursuant to Section 112 of the Federal Clean Air Act. Total HAPs were calculated by summing the pollutants marked with an *.

³TAP designates a toxic air pollutant pursuant to Chapter 173-460 of the Washington Administrative Code. Total TAPs were calculated by summing all the pollutants listed in the table.

⁴Other toxic air pollutants emitted at less than 0.1 TPY: 1,2,4-trimethylbenzene, cyclohexanone, and 2,4-methylpentanone.

5.0 REGULATORY DETERMINATIONS

5.1 NESHAP Applicability

NESHAP Applicability Recordkeeping

40 CFR 63.1(b)(3) and 63.10(b)(3) require sources to keep records of all applicability determinations made. Records need to be retained for each relevant standard (i.e. source is in the source category regulated by the standard). Based on the information currently available from the source (emission units located in Table 3.1 and 3.2 of the TSD), Westport Shipyard should be keeping applicability determinations for standards in the following regulations:

- Boat Manufacturing NESHAP (40 CFR Part 63 Subpart VVVV)
- Wood Furniture NESHAP (40 CFR Part 63 Subpart JJ)
- Shipbuilding NESHAP (40 CFR Part 63 Subpart II)
- Reinforced Plastics Composites Production NESHAP (40 CFR Part 63 Subpart WWW)
- Reciprocating Internal Combustion Engine NESHAP (40 CFR Part 63 Subpart ZZZ)
- Industrial, Commercial, and Institutional Boilers and Process Heaters NESHAP (40 CFR Part 63 Subpart DDDDD)
- Organic Liquid Distribution NESHAP (40 CFR Part 63 Subpart EEEE)

National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing (40 CFR Part 63 Subpart VVVV)

National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing (a.k.a. Boat Building MACT) was promulgated on August 22, 2001. The MACT applies to all boat manufacturing facilities that are major sources and that build fiberglass or aluminum boats. Westport Shipyard submitted initial notification to EPA per 40 CFR 63.5 on December 21, 2001. During initial permit issuance, ORCAA incorporated the MACT into Westport Shipyard's permit on the Subpart level to give Westport Shipyard time to determine what compliance method they will use to determine compliance with the MACT. Westport Shipyard was required to submit an application for significant permit modification by November 22, 2003 in order for ORCAA to incorporate the compliance methods into the permit before the compliance date.

ORCAA received an application for significant permit modification on November 26, 2003 (postmarked November 25, 2003). As this is a significant modification with many new conditions, ORCAA decided to reissue the permit with the new conditions, rather than issue the modification as an addendum.

The HAPs emitted by boat manufacturing facilities typically include: Styrene, methyl methacrylate, toluene, xylenes, methyl chloroform (1,1,1-trichloroethane), methyl ethyl ketone (MEK), and methyl isobutyl ketone (MIBK). However, the total organic HAP content limit includes all organic HAP listed in section 112(b) of the CAA. It is important to note that the MACT model point values are surrogates for emissions, and the MACT model point value equations are used only for determining compliance with the emission limits for open molding operations. The MACT model point value equations should not be used in other environmental programs for estimating emissions in place of true emission factor equations or site-specific data.

The conditions relating to the MACT in Section 9 were removed and revised as listed in Table 5.1. The requirements of 40 CFR 63 Subpart VVVV were added to the permit as described in Table 5.2. General MACT requirements from 40 CFR Subpart A were added to the permit as described in Table 5.3.

TABLE 5.1 STATUS OF SECTION 9 CONDITIONS

Condition #	Description	New Condition #
9.1	MACT Compliance at the subpart level	No longer needed. Westport Shipyard has submitted the significant modification application as required by the condition, and the applicable requirements in 40 CFR 63 Subpart VVVV are included in the reissued permit according to Table 5.2.
9.2	Changes to Notifications Submitted	Condition 8.13
9.3	Recordkeeping	Condition 7.13
9.4	Records retention	Condition 7.13

Table 5.2 Applicability Summary for 40 CFR 63 Subpart VVVV

40 CFR 63 Subpart VVVV Citation	40 CFR 63 Subpart VVVV Description	Applicability AOP Condition #
§ 63.5680	Describes the purpose of the subpart	Not an applicable requirement.
§ 63.5683	Applicability	Not an applicable requirement. Does not require any action by permittee.
§ 63.5686	How to demonstrate you are not a major source	Not an applicable requirement. The facility's potential to emit of styrene is > 10 TPY.
§ 63.5689	Defines what parts of the facility are affected by the MACT.	Not an ongoing applicable requirement. Does not require any action by the permittee.
§ 63.5692	Defines new source and existing source.	Not an applicable requirement. Westport Shipyard was initially constructed prior to July 14, 2000; therefore, it is an existing source.
§ 63.5695	Compliance date is August 23, 2004.	Included with all standards, as they will not need to comply with the conditions until August 23, 2004.
<i>Standards for Open Molding Resin and Gel Coat Operations</i>		
§ 63.5698(a)	You must meet the organic HAP emission limit in § 63.5698(b) for the following five open molding operations (1) Production resin. (2) Pigmented gel coat. (3) Clear gel coat. (4) Tooling resin. (5) Tooling gel coat.	Condition 5.2a
§ 63.5698(b)	Organic HAP emissions limit	Condition 5.2a; Condition 6.16(c)(i)
§ 63.5698(c)	States that the limit is the same for new and existing sources.	Not an applicable requirement.
§ 63.5698(d)	Exemptions from § 63.5698(a)	Condition 5.2b; Condition 6.15; Condition 7.15
<i>Compliance Options for Open Molding Resin Emission Limit</i>		
§ 63.5701(a)	MACT Model Point Value Averaging Option (Emissions Averaging option)	Condition 6.15; Condition 6.16
§ 63.5701(b)	Compliant Materials Option	Condition 6.15; Condition 6.17

Table 5.2 Applicability Summary for 40 CFR 63 Subpart VVVV

40 CFR 63 Subpart VVVV Citation	40 CFR 63 Subpart VVVV Description	Applicability AOP Condition #
§ 63.5701(c)	Add-on Control Option	Not applicable. Westport does not have an add-on control device. If Westport would like to use this option in the future it would require a NOC and significant modification to their AOP.
<i>General Requirements for Open Molding Emission Limit Compliance</i>		
§ 63.5704(a)	Emissions Averaging Option Compliance Steps	Condition 6.17; Condition 7.14; Condition 5.2c; Condition 8.12 Note: Westport Shipyard does use some spray techniques to apply resins, therefore application method recordkeeping is required.
§ 63.5704(b)	Compliant Materials Option Compliance Steps	Condition 6.17; Condition 7.14; Condition 8.12
§ 63.5704(c)	Add-on Control Option Compliance Steps	Not applicable. Westport does not have an add-on control device. If Westport would like to use this option in the future it would require a NOC and significant modification to their AOP.
<i>Open Molding Operations Implementation Plan</i>		
§ 63.5707(a)	Requires an implementation plan by prepared and maintained if you are using the emissions averaging option.	Condition 5.2c As Westport will be using the model point value averaging option, this plan is required.
<i>Open Molding Compliance Using Model Point Value Averaging Option</i>		
§ 63.5710	Emissions Averaging Option	Condition 6.17(c)
§ 63.5713	Compliant Materials Option	Condition 6.17(d)
§ 63.5714	Filled resins	Condition 6.17(e); Condition 6.16(c)(ii)
<i>Open Molding Compliance Controlled by Add-on Control Device</i>		
§ 63.5715 § 63.5716 § 63.5719 § 63.5722 § 63.5725	Requirements for add-on control devices	Not applicable. Westport does not have an add-on control device. If Westport would like to use this option in the future it would require a NOC and significant modification to their AOP.

Table 5.2 Applicability Summary for 40 CFR 63 Subpart VVVV

40 CFR 63 Subpart VVVV Citation	40 CFR 63 Subpart VVVV Description	Applicability AOP Condition #
<i>Standards for Closed Molding Operations</i>		
§ 63.5728	There are no requirements to reduce emissions from closed molding operations.	Not an applicable requirement. Does not require any action by the source.
<i>Standards for Resin and Gel Coat Mixing Operations</i>		
§ 63.5731(a)&(b)	Requirement	Condition 5.2d
§ 63.5731(c)	Monitoring	Condition 6.7
§ 63.5731(d)	Recordkeeping	Condition 7.17
<i>Standards for Resin and Gel Coat Application Equipment Cleaning Operations</i>		
§ 63.5734(a)	HAP limit	Condition 5.2e
§ 63.5734(b)	Solvent storage	Condition 5.2f
§ 63.5737(a)&(b)	HAP limit monitoring and recordkeeping	Condition 6.18; Condition 7.16
§ 63.5737(c)	Solvent storage monitoring.	Condition 6.7; Condition 7.17
<i>Standards for Carpet and Fabric Adhesive Operations</i>		
§ 63.5740(a)	HAP limit	Condition 5.2g
§ 63.5740(b)	Monitoring & recordkeeping	Condition 6.19; Condition 7.18
<i>Standards for Aluminum Recreational Boat Surface Coating Operations</i>		
§ 63.5743; § 63.5746; § 63.5749; § 63.5752; § 63.5755	Requirements	Not applicable. Westport Shipyard does not manufacture aluminum boats.
<i>Methods for Determining Hazardous Air Pollutant Content</i>		
§ 63.5758(a)	Determine organic HAP content of materials	Condition 6.20
§ 63.5758(b)&(c)	Procedures for aluminum recreational boat manufacture	Not applicable. Westport Shipyard does not manufacture aluminum boats.
<i>Notifications, Reports, and Records</i>		

Table 5.2 Applicability Summary for 40 CFR 63 Subpart VVVV

40 CFR 63 Subpart VVVV Citation	40 CFR 63 Subpart VVVV Description	Applicability AOP Condition #
§ 63.5761(a)	Submit all required notifications <ol style="list-style-type: none"> 1. initial notification - existing source 2. new source notification 3. compliance extension 4. notification of compliance status 5. notifications for add-on control 	<ol style="list-style-type: none"> 1. Not an ongoing application requirement, already submitted. 2. Not applicable, they are an existing source. 3. Not applicable as of compliance date, all requests for extension must be submitted before the compliance date. 4. Condition 8.11 5. Not applicable, Westport does not have an add-on control device. If Westport would like to use this option in the future it would require a NOC and significant modification to their AOP.
§ 63.5761(b)	Changes to notifications	Condition 8.13
§ 63.5764(a)	Reports – general info.	Condition 8.12
§ 63.5764(b)	Schedule for compliance report.	Condition 8.12
§ 63.5764(c)	Requirement for compliance report.	Condition 8.12
§ 63.5764(d)&(e)	For facilities with add-on control devices.	Not applicable. Westport does not have an add-on control device. If Westport would like to use this option in the future it would require a NOC and significant modification to their AOP.
§ 63.5767(a)&(b)	Notification and Reports Recordkeeping	Condition 7.13
§ 63.5767(c)(1)	Recordkeeping – Material use/monitoring	Condition 7.14
§ 63.5767(c)(2) &(3)	For aluminum boats	Not applicable. Westport Shipyard does not manufacture aluminum boats.
§ 63.5767(d)	For add-on control device	Not applicable. Westport does not have an add-on control device. If Westport would like to use this option in the future it would require a NOC and significant modification to their AOP.
§ 63.5770	General recordkeeping.	Condition 7.13
§ 63.5773	Comply with general provisions listed in Subpart A	Condition 2.1
§ 63.5776	Implementation & Enforcement	Not an applicable requirement. Does not require any action by the source.

Table 5.2 Applicability Summary for 40 CFR 63 Subpart VVVV

40 CFR 63 Subpart VVVV Citation	40 CFR 63 Subpart VVVV Description	Applicability AOP Condition #
§ 63.5779	Definitions	Not an applicable requirement. Does not require any action by the source.

Table 5.3 Summary of Applicability of 40 CFR 63 Subpart A

40 CFR 63 Subpart A Citation	40 CFR 63 Subpart A Description	Applicability AOP Section #
§63.1(a)(1)-(9)	General	Not an applicable requirement. General background conditions, not requiring any action by the permittee.
§63.1(a)(10)	Time periods specified in days shall be measured in calendar days, even if the word “calendar” is absent, unless otherwise specified in an applicable requirement.	Not an applicable requirement. No clarification needed in Subpart VVVV.
§63.1(a)(11)	Explanation of postmark date	Condition 8.11 Included in all Subpart VVVV applicable requirements except for compliance status report.
§63.1(a)(12)	Allows changing of deadlines	Not applicable. Applicable only when triggered.
§63.1(b)(1)	Initial NESHAP Applicability Determinations	Not an applicable requirement. Subpart A applicability, not requiring any action by the permittee.
§63.1(b)(2)	[Reserved]	-
§63.1(b)(3)	Applicability Determination Recordkeeping for sources not subject to a relevant standard	Condition 7.12
§63.1(c)(1)	An affected source must comply with the relevant standard and Subpart A.	Condition 2.1
§63.1(c)(2)	Title V Requirements	Not applicable. Westport Shipyard is already a Title V source.
§63.1(c)(3)-(4)	[Reserved]	-
§63.1(c)(5)	Notification requirement for area sources that become major HAP sources.	Not applicable. Westport Shipyard is already a major HAP source.
§63.1(d)	[Reserved]	-
§63.1(e)	Procedures for a MACT standard that applies to a source with a section 112(j) emission limit	Not applicable. ORCAA has no sources that were issued a 112(j) emission limit.
§63.2	Definitions	Not an applicable requirement. This section simply defines definitions of terms used in Subpart A.
§63.3	Units and Abbreviations	Not an applicable requirement. This section simply defines definitions units and abbreviations used in Subpart A.
§63.4(a)(1)	Affected source must be operated in compliance with Subpart A.	Condition 2.1

Table 5.3 Summary of Applicability of 40 CFR 63 Subpart A

40 CFR 63 Subpart A Citation	40 CFR 63 Subpart A Description	Applicability AOP Section #
§63.4(a)(2)	Owner or operator must keep records, notify, report or revise reports as required by Subpart A.	Condition 2.1
§63.4(a)(3)-(5)	[Reserved]	-
§63.4(b)	Prohibits concealment of emissions.	Condition 4.28
§63.4(c)	Prohibits fragmentation to avoid NSR requirements.	Condition 3.10
§63.5(a)(1)	Preconstruction review and notification requirements – Applicability.	Condition 3.7
§63.5(a)(2)	Notification for new major-emitting sources.	Not applicable. Westport Shipyard is already a major source.
§63.5(b)(1)	Requirements for new and reconstructed sources. Reconstructed sources are subject to relevant standards for new sources.	Not applicable. Subpart VVVV requirements are the same for new and existing sources. Therefore, no action required by permittee.
§63.5(b)(2)	[Reserved]	-
§63.5(b)(3)	Requirement for approval for construction or reconstruction.	Condition 3.7
§63.5(b)(4)	Notification of construction of new affected source that is not major-emitting, or reconstruction of affected source that is not major-emitting, or reconstruction a source such that the source becomes an affected source.	Not applicable. Westport Shipyard is already a major source.
§63.5(b)(5)	[Reserved]	-
§63.5(b)(6)	After the effective date, all equipment added or process changes to an affected source that is within the scope of the definition of an affected source under the relevant standard must be considered part of the major source and subject to all provisions of that standard.	Condition 3.9
§63.5(c)	[Reserved]	-
§63.5(d)	Requirements for application for approval of construction of reconstruction	Condition 3.7
§63.5(e)	Requirements for ORCAA to approve reconstruction.	Condition 3.7
§63.6(a)	Applicability – standard and maintenance requirements	Not an applicable requirement. Does not require any action by the permittee.
§63.6(b)	Compliance dates for new or reconstructed sources	Not applicable. The source is an existing source.

Table 5.3 Summary of Applicability of 40 CFR 63 Subpart A

40 CFR 63 Subpart A Citation	40 CFR 63 Subpart A Description	Applicability AOP Section #
§63.6(c)	Compliance dates for existing sources	Included with all standards.
§63.6(d)	[Reserved]	-
<i>O&M-RELATED REQUIREMENTS</i>		
§63.6(e)(1)-(2)	O&M – Must operate and maintain affected source consistent with good air pollution control practices.	Does not apply to Subpart VVVV.
<i>SSM PLAN-RELATED REQUIREMENTS</i>		
§63.6(e)(3)	Must develop startup, shutdown, and malfunction plan.	Not applicable. Applies only to facilities with add-on controls subject to Subpart VVVV. Westport does not have an add-on control device. If Westport would like to use this option in the future it would require a NOC and significant modification to their AOP.
<i>EMISSION STANDARD-RELATED REQUIREMENTS (NONOPACITY)</i>		
§63.6(f)(1)	Nonopacity emission standards apply at all times except during startup, shutdown, and malfunction, and as otherwise specified in the applicable subpart.	Condition 5.2a, Condition 5.2d, Cond 5.2e, Condition 5.2f, Condition 5.2g As only VVVV sources with an add-on controls are required to keep SSM records or have a SSM plan, SSM provision of this requirement applies only to them.
§63.6(f)(2)(i)-(ii)	Explains how the Administrator will determine compliance with emission standards.	Not an applicable requirement. Does not require any action by the permittee.
§63.6(f)(2)(iii)	Describes when a performance test can be used to show compliance.	Not an ongoing applicable requirement. Does not require any action by the permittee.
§63.6(f)(2)(iv)-(v)	Explains how the Administrator will determine compliance with emission standards.	Not an applicable requirement. Does not require any action by the permittee.
§63.6(f)(3)	Explains how the Administrator will determine compliance with emission standards.	Not an applicable requirement. Does not require any action by the permittee.

Table 5.3 Summary of Applicability of 40 CFR 63 Subpart A

40 CFR 63 Subpart A Citation	40 CFR 63 Subpart A Description	Applicability AOP Section #
§63.6(g)	Procedures for use of alternative emission standard (approved by Administrator).	Not an ongoing applicable requirement. Applicable only if owner or operator requests an alternative emission standard.
<i>OPACITY EMISSION STANDARD-RELATED REQUIREMENTS</i>		
§63.6(h)(1)	Visible emission standards apply at all times except during startup, shutdown, and malfunction, and as otherwise specified in the applicable subpart.	Does not apply to Subpart VVVV.
<i>COMPLIANCE EXTENSION-RELATED REQUIREMENTS</i>		
§63.6(i)	These requirements all have to do with requests for extensions, etc.	Not an ongoing applicable requirement. These sections are only applicable when an owner or operator requests a compliance extension, etc.
§63.6(j)	Presidential exemption.	Not an ongoing applicable requirement. Only applies if determined by the President.
<i>PERFORMANCE TESTING & MONITORING REQUIREMENTS</i>		
§63.7(a) §63.8		Not applicable. Applies only to facilities with add-on controls subject to Subpart VVVV. Westport does not have an add-on control device. If Westport would like to use this option in the future it would require a NOC and significant modification to their AOP.
<i>NOTIFICATION REQUIREMENTS</i>		
§63.9(a)(1)-(2)	Applicability.	Not an applicable requirement.
§63.9(a)(3)-(4)	General information.	Not an ongoing applicable requirement. Initial notification has already been submitted.
§63.9(b)(1)	Applicability	Not an ongoing applicable requirement. Does not require any action by the permittee.
§63.9(b)(2)	Notification requirements for existing sources.	Not an ongoing applicable requirement. Initial notification has already been submitted.
§63.9(b)(3)	[Reserved]	-

Table 5.3 Summary of Applicability of 40 CFR 63 Subpart A

40 CFR 63 Subpart A Citation	40 CFR 63 Subpart A Description	Applicability AOP Section #
§63.9(b)(4)(i)	For new or reconstructed major affected source for which an application for approval is required under §63.5(d) shall submit a notification of intent to construct (included with application) and notification of startup postmarked within 15 days of startup	Condition 3.8
§63.9(b)(4)(ii)-(iv)	[Reserved]	-
§63.9(b)(4)(v)	For new or reconstructed major affected source for which an application for approval is required under §63.5(d) shall submit a notification of startup postmarked within 15 days of startup	Condition 3.8
§63.9(b)(5)(i)	For new or reconstructed major affected source for which an application for approval is <u>not</u> required under §63.5(d) shall submit a notification of intent to construct.	Not applicable. If Westport would like to reconstruct, an application for approval is required.
§63.9(b)(5)(ii)	For new or reconstructed major affected source for which an application for approval is <u>not</u> required under §63.5(d) shall submit a notification of date of startup postmarked within 15 days of startup.	Not applicable. If Westport would like to reconstruct, an application for approval is required.
§63.9(b)(5)(iii)	Requirements for content of notification.	Not applicable. If Westport would like to reconstruct, an application for approval is required.
§63.9(c)	Request for extension.	Not applicable. Only applies when requested by owner or operator.
§63.9(d)	Owner of new source must submit notification if subject to special compliance requirements.	Not an ongoing applicable requirement. This notification (if required) is submitted with the initial notification, which should have already have been submitted. Therefore, do not need to include in AOP.

Table 5.3 Summary of Applicability of 40 CFR 63 Subpart A

40 CFR 63 Subpart A Citation	40 CFR 63 Subpart A Description	Applicability AOP Section #
§63.9(e)	The owner or operator shall notify the Administrator in writing of performance testing at least 60 calendar days in advance.	Not applicable. Applies only to facilities with add-on controls subject to Subpart VVVV. Westport does not have an add-on control device. If Westport would like to use this option in the future it would require a NOC and significant modification to their AOP.
§63.9(f)	The owner or operator shall notify Administrator in writing of the anticipated date of conducting opacity observations, per §63.6(h)(5).	Does not apply to Subpart VVVV.
§63.9(g)(1)	The owner or operator of a continuous monitoring system shall submit notification of the date of the CMS performance evaluation at least 60 days in advance.	Not applicable. Applies only to facilities with add-on controls subject to Subpart VVVV. Westport does not have an add-on control device. If Westport would like to use this option in the future it would require a NOC and significant modification to their AOP.
§63.9(g)(2)	The owner or operator of a continuous monitoring system shall submit notification that COMS data will be used to determine compliance at least 60 days in advance of performance test.	Does not apply to Subpart VVVV.
§63.9(g)(3)	The owner or operator of a continuous monitoring system shall submit notification that the criterion necessary to continue use of an alternative to relative accuracy testing has been exceeded within 10 days after the occurrence of such exceedance.	Not applicable. Applies only to facilities with add-on controls subject to Subpart VVVV. Westport does not have an add-on control device. If Westport would like to use this option in the future it would require a NOC and significant modification to their AOP.
§63.9(h)(1)	Compliance status notifications – Applicability.	Not an ongoing applicable requirement. Does not require any action by the permittee.
§63.9(h)(2)	Compliance status notifications – Before Title V permit is issued.	Not applicable. Title V permit already issued.
§63.9(h)(3)	Requires submittal of compliance status reports as required by the relevant standard to be submitted to the Title V permitting agency.	Condition 2.1
§63.9(h)(4)	[Reserved]	-

Table 5.3 Summary of Applicability of 40 CFR 63 Subpart A

40 CFR 63 Subpart A Citation	40 CFR 63 Subpart A Description	Applicability AOP Section #
§63.9(h)(5)	If an owner or operator of an affected source submits estimates in the application for approval of construction or reconstruction required in §63.5(d) in place of the actual emissions data or control efficiencies required in §63.5, the owner or operator shall submit actual emissions data and other information as soon as available but no later than with the initial notification of compliance status.	Condition 3.8
§63.9(h)(6)	Advice of notification of compliance status may be obtained from the administrator.	Not an applicable requirement.
§63.9(i)	Procedures to request adjustments to time periods and postmark deadlines.	Not an applicable requirement. Only applies when requested by owner or operator.
§63.9(j)	Any change in the information already provided under this section shall be provided to the Administrator within 15 calendar days after the change.	Condition 8.13
<i>RECORDKEEPING AND REPORTING REQUIREMENTS</i>		
§63.10(a)	Applicability and general information.	Not an applicable requirement.
§63.10(b)(1)	The owner or operator of an affected source shall maintain files of all information (incl. reports and notifications) required by this part recorded in a form suitable and readily available for expeditious inspection and review. Files shall be retained for at least 5 years following the date of creation. At a minimum the most recent 2 years shall be kept on-site.	Condition 7.13
§63.10(b)(2)	Recordkeeping	Not applicable. Applies only to facilities with add-on controls subject to Subpart VVVV. Westport does not have an add-on control device. If Westport would like to use this option in the future it would require a NOC and significant modification to their AOP.

Table 5.3 Summary of Applicability of 40 CFR 63 Subpart A

40 CFR 63 Subpart A Citation	40 CFR 63 Subpart A Description	Applicability AOP Section #
§63.10(b)(3)	Requirement to keep records of all applicability determinations made for any relevant standards.	Condition 7.12
§63.10(c)	Sources required to install a CMS shall maintain records (1)-(15)	Not applicable. Applies only to facilities with add-on controls subject to Subpart VVVV. Westport does not have an add-on control device. If Westport would like to use this option in the future it would require a NOC and significant modification to their AOP.
§63.10(d)(1)	The owner or operator shall submit reports to the Administrator as required by the relevant standard.	Condition 2.1
§63.10(d)(2)	Report of performance test results due within 60 days of completion of the tests.	Not applicable. Applies only to facilities with add-on controls subject to Subpart VVVV. Westport does not have an add-on control device. If Westport would like to use this option in the future it would require a NOC and significant modification to their AOP.
§63.10(d)(3)	Report of results of opacity observations due with performance test results, or within 30 days of completion of the tests (if a performance test is not required).	Does not apply to Subpart VVVV.
§63.10(d)(4)	Progress reports shall be submitted by the dates specified in the written extension of compliance.	Not applicable. Only required for sources who requested a compliance extension.
§63.10(d)(5)	Periodic startup, shutdown, and malfunction reports.	Not applicable. Applies only to facilities with add-on controls subject to Subpart VVVV. Westport does not have an add-on control device. If Westport would like to use this option in the future it would require a NOC and significant modification to their AOP.

Table 5.3 Summary of Applicability of 40 CFR 63 Subpart A

40 CFR 63 Subpart A Citation	40 CFR 63 Subpart A Description	Applicability AOP Section #
§63.10(e)	Additional reporting requirements for sources with CMS.	Not applicable. Applies only to facilities with add-on controls subject to Subpart VVVV. Westport does not have an add-on control device. If Westport would like to use this option in the future it would require a NOC and significant modification to their AOP.
§63.10(f)	Waiver of recordkeeping and reporting requirements.	Not applicable. Only required for sources who request a waiver.
§63.11	Requirements for flares.	Not applicable. Westport Shipyard does not have any flares.
§63.12; §63.13	State authority & delegations, etc.	Not an applicable requirement. Does not require any action by the permittee.
§63.14	List of documents incorporated by reference.	Not an applicable requirement. Does not require any action by the permittee.
§63.15(a)	Availability of information	Not an applicable requirement. Does not require any action by the permittee.
§63.15(b)	Confidentiality	Not an applicable requirement. Does not require any action by the permittee.

5.2 PSD Applicability

Westport Shipyard's plant-wide potential to emit is less than the PSD major source thresholds; therefore, PSD does not apply.

5.3 Definition of Major Source

In addition to the facility in Westport, Westport Shipyard also owns manufacturing facilities in Hoquiam, Port Angeles, and La Conner. Of these, Westport Shipyard's Westport facility is the only major source with respect to Title V since annual styrene emissions at the Westport facility are greater than 10 tons per year.

The Hoquiam, Port Angeles, and La Conner facilities can only be considered as part of the Westport facility if they meet three criteria: 1) must be located on one or more contiguous or adjacent properties; and 2) be under common control of the same person (or persons under common control); and 3) belong to a single major industrial grouping (same two-digit SIC code) [WAC 173-401-200(17)].

Building 12 in Port Angeles

Westport Shipyard manufactures the Westport 164 model yacht at 637 Marine Drive in Port Angeles. Since Building 12 is located approximately 160 miles from the Westport facility, it is not contiguous or adjacent; therefore, it is not considered part of the Westport facility.

Building 11 in Port Angeles

The cabinet shop in Port Angeles is located at 2138 West 18th. The Port Angeles Cabinet Shop manufactures cabinets solely for the use of Westport Shipyard's Westport and Hoquiam facilities. As the Port Angeles shop is located approximately 160 miles from the Westport facility, it is not contiguous or adjacent, therefore, it is not considered part of the Westport facility.

La Conner Facility

Westport Shipyard manufactures the Westport 98 model yacht in La Conner. Since this facility is located approximately 240 miles from the Westport facility, it is not contiguous or adjacent; therefore, it is not considered part of the Westport facility.

Hoquiam Facility

The Hoquiam facility is located at 2850 John Stevens Way in Hoquiam. Activities at the facility include small and large parts lamination, assembly, and painting. No products are shipped from the Hoquiam facility to the Westport facility.

The Hoquiam facility is owned by Westport Shipyard and is in the same major industrial grouping as the Westport facility. However, in order to be a support facility the Hoquiam facility must be contiguous or adjacent to the Westport facility. There is no guidance available regarding the definition of "contiguous" or "adjacent" with respect to the Title V program. By dictionary definition, "contiguous" means "1. in contact; touching; 2. near; next" and "adjacent" means "near or close (to); adjoining". As the Hoquiam facility is located approximately 16 miles from the Westport facility by water (25 miles by road), this proximity does not meet the definition of either term. Therefore, the Hoquiam facility is not part of the Westport facility.

5.4 CAM Applicability

Compliance Assurance Monitoring (CAM) does not apply to Westport Shipyard Inc, as the

Westport Shipyard emission units do not meet the applicability criteria in 40 CFR 64.2(a). Westport Shipyard emission units are only subject to an annual emission cap and Westport Shipyard uses no control devices to achieve compliance with that standard. Therefore, CAM does not apply.

5.5 Compliance History

There have been four non-compliance events at Westport Shipyard involving air regulations. They are listed in Table 5.4.

Table 5.4 Summary of Air Compliance History

Year	NOV Number(s)	Description of Violation	Resolution
1974	312 and 313	Open burning without a valid permit and burning of prohibitive.	Paid a civil penalty of \$150
1997	1161	Failure to submit annual emission inventory.	NOV was voided once the emission inventory was submitted
2000	1639	Failure to promptly submit supplementary facts and correct information to the air operating permit application.	Paid a civil penalty of \$400
2007	2663 – 2978; 2689; 2690; and 2691.	For the period August 23, 2006 through February 23, 2008, there was an ongoing, continuous violation of 40 CFR Part 63 Subpart VVVV. Specifically, the Model Point Value Average exceeded the MACT HAP limit for the entirety of the violation period.	Paid a civil penalty of \$110,000

6.0 NOTICES OF CONSTRUCTION

The following table provides summary descriptions of all Notices of Construction (NOC) approvals on record with ORCAA for the Westport Shipyard facility. Information provided describes which conditions from NOCs are applicable requirements for the facility. The information provided also indicates the basis for each determination and, if the condition is an applicable requirement, reference to the corresponding AOP condition. Records on file with ORCAA indicate that all past modifications at the Westport Shipyard facility have complied with state, federal and local new source review requirements.

TABLE 6.1 SUMMARY OF AIR REGULATORY HISTORY

NOC # (date)	NOC Condition	Description (for information only)	Applicability AOP Condition #
NOC 657 issued: 7/19/95 Conditional approval of new boat finishing building.	#1	The owner or operator shall notify ORCAA in writing of the actual date construction is completed within 15 days after such date by completing and returning NOC Form 3 to ORCAA.	Not an ongoing applicable requirement. The equipment was established and ORCAA was notified on June 19, 1996.
	#2	The facility and all associated equipment shall be in accordance with the information and specifications as described in the associated NOC application unless otherwise specified by condition in this Approval Order. Deviations from the equipment types, materials, and specifications described in the NOC application which have the potential for increasing air pollution emissions may constitute a violation of this Approval Order and Regulation 1, section 7.09, unless prior approval is given by ORCAA.	Not an ongoing applicable requirement. The equipment was established and equipment specifications have been verified by ORCAA inspection.
	#3	Filter Exhaust: Air shall be filtered prior to exhausting to the atmosphere. Filters shall be suitable for capture or knockout of overspray. Filters shall be checked on a daily basis and changed if necessary. 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.	Applicable requirement AOP Conditions: 5.1a (filter requirement) 6.7 (filter monitoring)

TABLE 6.1 SUMMARY OF AIR REGULATORY HISTORY

NOC # (date)	NOC Condition	Description (for information only)	Applicability AOP Condition #
	#4	<p>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:</p> <ul style="list-style-type: none"> a. A required daily check and recording of the filter condition to assure filters are clean, properly seated, and covering all openings. b. Reasonable measures and precautions for minimizing volatile emissions in the shop. c. A semiannual or monthly schedule for cleaning and maintaining the stack and fan blades. <p>Standard procedures for responding to odor and fallout complaints including notifying ORCAA of these occurrences.</p>	<p>Applicable requirement</p> <p>AOP conditions: 8.7 (complaint reporting) 4.10 (O&M requirement) 6.4 (complaint monitoring) 6.7 (filter monitoring)</p>
	#5	<p>The terms and conditions in this approval order are enforceable by ORCAA, the Washington Department of Ecology, and the U.S. Environmental Protection Agency, and are in addition to applicable federal, state, and local regulations and standards. Failure to comply with the terms and conditions of this order constitutes a violation of ORCAA Regulation 1 and will be subject to penalties accordingly.</p>	<p>Redundant. This condition simply states the utility of regulatory approval orders.</p>
<p>Regulatory Order Issued: 5/24/95 (Voluntary limit on emissions)</p>	#1	<p>The material use and composition limits specified in 1.a and 1.b shall apply commencing the date of issuance of this regulatory order. Use of alternative materials, which have the potential for increasing pollution emissions or causing a new pollutant to be emitted, shall require prior approval by ORCAA.</p> <ul style="list-style-type: none"> a. Total cumulative use of resin, gelcoat and any other materials containing styrene shall not exceed 354,799 pounds per consecutive 12 month period. Percent of styrene by weight in the gelcoat used shall not exceed 35 percent. Percent of styrene by weight in resin and other materials used shall not exceed 45 percent. b. Total cumulative use of paints and solvents, except for acetone, shall not exceed 2000 gallons per consecutive 12 month period. 	<p>Rescinded with issuance of NOC# 01MOD181 (5/14/03)</p>

TABLE 6.1 SUMMARY OF AIR REGULATORY HISTORY

NOC # (date)	NOC Condition	Description (for information only)	Applicability AOP Condition #
	#2	<p>The information and data listed below shall be compiled or updated on a monthly basis and retained for a period of not less than 5 years. The attached form is provided as an example and may be used to facilitate compliance with this condition.</p> <ol style="list-style-type: none"> a. Reference to a current MSDS for all materials used at the facility during the previous month. Copies of MSDS for all materials used at the facility during the previous 5 year period shall be retained on site. b. The total amount of pounds of resins/gelcoats and paints/solvents used during the previous month. c. The cumulative amount in pounds of resin/gelcoats and paints/solvents used during the previous consecutive 12 month period. d. Material purchase invoices for purchases during the previous month indicating the material identification #, corresponding MSDS and the amount of material purchased. 	Rescinded with issuance of NOC# 01MOD181 (5/14/03)
	#3	The information described in condition #2 above shall be reported to ORCAA upon request. Reports shall be accompanied by a certified statement signed by the owner or operator of the facility that the records submitted accurately account for all material used and emissions during the reporting period.	Rescinded with issuance of NOC# 01MOD181 (5/14/03)
<p>NOC 98NOC049 issued: 3/3/99</p> <p>Conditional approval of exhaust ventilation equipment and voluntary limit on emissions.</p>	#1	Equipment and operations at the facility shall be in accordance with the information and specifications as described in the associated NOC application (98NOC049) unless otherwise specified by condition in this Approval Order. Deviations from the operations, equipment types, materials, and specifications described in the NOC application which have the potential for increasing air pollution emissions may constitute a violation of this Approval Order and Regulation 1, section 7.09, unless prior approval is given by ORCAA.	Superseded by 01MOD181 (5/14/03)

TABLE 6.1 SUMMARY OF AIR REGULATORY HISTORY

NOC # (date)	NOC Condition	Description (for information only)	Applicability AOP Condition #
	#2	<p>Complaints: The owner or operator shall monitor air quality related complaints including odor and fallout complaints as follows:</p> <ul style="list-style-type: none"> a) A contact person shall be available at all times the facility is operating to take complaints and to respond to inquiries regarding facility air emissions; b) Air related complaints received shall be investigated by determining the status of facility operations, status of pollution control equipment, and the rate of emissions at the time of the alleged impacts occurred; c) A standard record of any air related complaint received and the associated complaint investigation report shall be made and shall be retained for at least 2 years; and, d) ORCAA shall be notified of any air related complaint received as soon as possible but not later than two days after the complaint was received. 	<p>Applicable requirement</p> <p>AOP Conditions: 8.7 (complaint reporting) 6.4 (complaint monitoring)</p>
	#3	Plant-wide emissions of VOC shall not exceed 32 tons per consecutive 12 month period.	Superseded by 08NOC627 (5/13/09)

TABLE 6.1 SUMMARY OF AIR REGULATORY HISTORY

NOC # (date)	NOC Condition	Description (for information only)	Applicability AOP Condition #
	#4	<p>Emissions Monitoring: Compliance with the plant-wide VOC emission limit in Condition #3 above shall be monitored as follows:</p> <ul style="list-style-type: none"> a) The owner or operator 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 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 materials, except for materials purchased in hand held spray cans and materials purchased in containers which are 1 gallon or less, shall be determined by conducting a monthly facility inventory; d) Results from the monthly inventory shall be cross checked with material purchase records; e) The percent breakdown of the methods used to apply each material shall be determined based on results from monthly audits of production operations; and, f) The VOC composition of each unique material shall be determined based on material safety data sheets (MSDS) and/or Certificates of Analyses specific to each material. 	<p>Applicable requirement</p> <p>AOP Conditions: 6.9 (emission monitoring) 7.11 (records of materials used)</p>

TABLE 6.1 SUMMARY OF AIR REGULATORY HISTORY

NOC # (date)	NOC Condition	Description (for information only)	Applicability AOP Condition #
	#5	<p>Recordkeeping: The following records shall be maintained at the site for a minimum of two years and shall be made available for inspection upon request:</p> <ul style="list-style-type: none"> a) Record of complaint investigation and response using the standard Complaint Investigation and Resolution form provided in Attachment 2; b) Monthly and 12 month cumulative VOC emission records; c) Material usage records from monthly material use inventories; d) Material purchase records for all VOC containing materials used except materials contained in hand-held spray cans and materials purchased in containers which are one gallon or less; e) Material safety data sheets (MSDS) for all materials described in 5.d above; and, f) Monthly record of the percent breakdown of application methods used to apply each unique material. 	<p>Applicable requirement</p> <p>AOP Conditions: 7.6 (emission records) 7.9 (records or complaints) 7.11 (material use records)</p>
	#6	<p>Completion Notice: The owner or operator shall notify ORCAA in writing of the actual date construction is completed within 15 days after such date by completing and returning NOC Form 3 to ORCAA.</p>	<p>Not an ongoing applicable requirement</p>
<p>NOC 01MOD181 issued: 5/14/03</p> <p>Change of conditions request to 98NOC049</p>	#1	<p>Complaints: The owner or operator shall monitor air quality related complaints including odor and fallout complaints as follows:</p> <ul style="list-style-type: none"> e) A contact person shall be available at all times the facility is operating to take complaints and to respond to inquiries regarding facility air emissions; f) Air related complaints received shall be investigated by determining the status of facility operations, status of pollution control equipment, and the rate of emissions at the time of the alleged impacts occurred; g) A standard record of any air related complaint received and the associated complaint investigation report shall be made and shall be retained for at least 2 years; and, h) ORCAA shall be notified of any air related complaint received as soon as possible but not later than two days after the complaint was received. 	<p>Applicable requirement</p> <p>AOP Conditions: 8.7 (complaint reporting) 6.4 (complaint monitoring)</p>
	#2	<p>Plant-wide emissions of VOC shall not exceed 32 tons per consecutive 12-month period.</p>	<p>Superseded by 08MOD627 (5/13/09)</p>

TABLE 6.1 SUMMARY OF AIR REGULATORY HISTORY

NOC # (date)	NOC Condition	Description (for information only)	Applicability AOP Condition #
	#3	<p>Emissions Monitoring: Compliance with the plant-wide VOC emission limit in Condition #3 above shall be monitored as follows:</p> <ul style="list-style-type: none"> a) The owner or operator 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 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 materials, except for materials purchased in hand held spray cans and materials purchased in containers which are less than one gallon, shall be determined by conducting a monthly facility inventory; d) Results from the monthly inventory shall be cross checked with material purchase records; 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 in Condition 6; and f) The VOC composition of each unique material shall be determined based on material safety data sheets (MSDS) and/or Certificates of Analyses specific to each material. 	<p>Applicable requirement</p> <p>AOP conditions: 6.8 (emission calculations) 6.9 (emission monitoring)</p>

TABLE 6.1 SUMMARY OF AIR REGULATORY HISTORY

NOC # (date)	NOC Condition	Description (for information only)	Applicability AOP Condition #
	#4	<p>Recordkeeping: The following records shall be maintained at the site for a minimum of two years and shall be made available for inspection upon request:</p> <ul style="list-style-type: none"> a) Record of complaint investigation and response; b) Monthly and 12 month cumulative VOC emission records; c) Material usage records from monthly material use inventories; d) Material purchase records for all VOC containing materials used except materials contained in hand-held spray cans and materials purchased in containers which are less than one gallon; e) Material safety data sheets (MSDS) for all materials described in 5.d above; and f) Monthly record of the percent breakdown of application methods used to apply each unique material; and <p>Monthly and 12-month cumulative coating usage records for each coating used on commercial and/or military vessels.</p>	<p>Applicable requirement</p> <p>AOP conditions: 7.9 (complaint recordkeeping) 7.11 (material use recordkeeping)</p>
	#5	<p>Commercial/Military Vessel Coating Limit: The owner or operator shall use less than 200 liters (52.8 gallons) per consecutive 12-month period of any single coating on commercial and/or military vessels. Total volume of all coatings used on commercial and/or military vessels shall not exceed 1000 liters (264 gallons) per consecutive 12-month period. The owner or operator shall monitor compliance with these limits by keeping a daily record of the volume of coatings applied to commercial and/or military vessels and, on a monthly basis, computing the total volume of coatings applied to commercial and/or military vessels over the previous 12 consecutive month period. In addition, the owner or operator shall maintain records of the types (military, commercial, or pleasure) and sizes of vessels in production and completed.</p>	<p>Applicable requirement</p> <p>AOP Conditions: 4.16 (coating limit) 6.12 (monitoring) 7.11 (recordkeeping)</p>
	#6	<p>Application Methods Audit Plan: The owner or operator shall develop and implement an Application Methods Audit Plan with procedures for conducting monthly audits of the methods used to apply each materials (spray, impregnator, flow coater, etc). The Application Methods Audit Plan shall include a requirement to conduct audits monthly and shall be submitted to ORCAA for approval.</p>	<p>Applicable requirement</p> <p>Condition 6.10</p>

TABLE 6.1 SUMMARY OF AIR REGULATORY HISTORY

NOC # (date)	NOC Condition	Description (for information only)	Applicability AOP Condition #
NOC 04NOC351 issued: 4/8/2004	#1	Welding Shop Filter System: Welding operations shall be conducted only when the filter system is operating properly. Welding fumes shall be filtered using a filter system with a 95% control efficiency or better (per manufacturer specifications)	Applicability requirement AOP conditions: 4.21
	#2	Operations and Maintenance Plan: The owner or operator shall, devise 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.	Applicability requirement AOP conditions: 4.10 (O&M requirement)
	#3	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.	Applicability requirement AOP conditions: 4.7 (fugitive emissions)
NOC 06NOC462 Issued: 6/13/2006	#1	Technical Specification. Pollution generating equipment and control devices at the facility shall be in accordance with the information and specifications as described in the associated NOC application unless otherwise specified by condition in this Approval Order. Deviations from the equipment types, materials, and specifications as described in the NOC application may constitute a violation of this Approval Order and Regulation 1, unless prior approval is given by ORCAA.	Not an ongoing applicable requirement
	#2	Material Use Limit: The amount of <i>Eurocyl "U" "NY"</i> (Antoni Code 578-0500) used, applied or disposed of at the facility shall not exceed 850 gallons per 12-consecutive month period, unless prior approval is granted by ORCAA.	Applicable requirement AOP Conditions: 4.18

TABLE 6.1 SUMMARY OF AIR REGULATORY HISTORY

NOC # (date)	NOC Condition	Description (for information only)	Applicability AOP Condition #
	#3	Material Use Limit: The amount of <i>Eurothane Clear</i> (Antoni Code 570-0000) used, applied or disposed of at the facility shall not exceed 600 gallons per 12-consecutive month period, unless prior approval is granted by ORCAA.	Applicable requirement AOP Conditions: 4.18
	#4	Material Use Limit: The amount of <i>Reducer</i> (Antoni Code SOL-4007) used or disposed of at the facility shall not exceed 412 gallons per 12-consecutive month period, unless prior approval is granted by ORCAA.	Applicable requirement AOP Conditions: 4.18
	#5	Material Use Limit: The amount of <i>West System Epoxy</i> (Product Code 105) used or disposed of at the facility shall not exceed 375 gallons per 12-consecutive month period, unless prior approval is granted by ORCAA.	Applicable requirement AOP Conditions: 4.18
	#6	Material Use Limit: The amount of <i>West System Hardener</i> (Product Code 205) used or disposed of at the facility shall not exceed 80 gallons per 12-consecutive month period, unless prior approval is granted by ORCAA.	Applicable requirement AOP Conditions: 4.18
	#7	Monitoring: The owner or operator shall monitor compliance with the material use limits established in Condition 2, Condition 3, Condition 4, Condition 5, and Condition 6 on a monthly basis.	Applicable requirement AOP Conditions: 6.13
	#8	Recordkeeping Requirements: Material use records shall be maintained and updated on a monthly basis. Records shall be sufficient to verify the actual, cumulative amount of coating materials used in terms of gallons per month and 12-consecutive month period. Monthly records shall be retained at the facility for at least two years. At a minimum, material use records shall include the following: a) Purchase invoices indicating the amount of coating materials purchased, date of purchase, and corresponding product identification numbers; b) Actual cumulative use of VOC materials in terms of gallons per month; and, c) Material Safety Data Sheets (MSDS) for all VOC materials used.	Applicable requirement AOP Conditions: 7.11

TABLE 6.1 SUMMARY OF AIR REGULATORY HISTORY

NOC # (date)	NOC Condition	Description (for information only)	Applicability AOP Condition #
	#9	<p>OPERATIONS AND MAINTENANCE: The owner or operator shall devise, 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:</p> <ul style="list-style-type: none"> 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. 	<p>Applicable requirement</p> <p>AOP Conditions: 4.10 (O&M requirement)</p>
<p>NOC 07NOC554 Issued: 1/25/2008</p>	#1	<p>Technical Specifications: Pollution generating equipment, air pollution control devices and operations at the facility shall be in accordance with the information and specifications described in the associated NOC application unless otherwise specified by condition in this Order.</p>	<p>Not an ongoing applicable requirement</p>
	#2	<p>Diesel Engine Operating Limit: The total annual operating hours of the Caterpillar C15 diesel engine in Building 9 shall not exceed 500 hours. The hours of operation shall be recorded using a non-resetting, factory-installed engine hour meter.</p>	<p>Applicable requirement</p> <p>AOP Conditions: 4.19 (operating limit)</p>
	#3	<p>Fuel Sulfur Limit: The Caterpillar C15 diesel engine in Building 9 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 that indicate the certified percent sulfur of the fuel.</p>	<p>Applicable requirement</p> <p>AOP Conditions: 6.6 (sulfur dioxide emissions monitoring)</p>

TABLE 6.1 SUMMARY OF AIR REGULATORY HISTORY

NOC # (date)	NOC Condition	Description (for information only)	Applicability AOP Condition #
	#4	Opacity Limit: Visible emissions from the Caterpillar C15 diesel engine in Building 9 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 periods 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).	Applicable requirement AOP Conditions: 4.20 (BACT opacity limits) 6.1 (opacity surveys)
	#5	Operation Plan: The owner or operator shall update the facility Operations and Maintenance (O&M) plan to include procedures specific to operation of the new Caterpillar C15 diesel engine, the new ventilation system in Building 9, and the new ventilation system in Building 4.	Applicable requirement AOP Conditions: 4.10 (O&M requirement)
	#6	Required Records: The following records shall be maintained on-site for no less than 5 years from origination and made available for inspection by ORCAA upon request: a. The O&M plan required by Condition 6; b. The total number of hours that the Caterpillar C15 diesel engine in Building 9 operates, recorded on at least a monthly basis and shown as a 12-month rolling total; and, c. Purchase invoices indicating the supplier, date, quantity, grade, and sulfur content of all diesel fuel combusted in the Caterpillar C15 diesel engine in Building 9.	Applicable requirement AOP Conditions: 7.1 (recordkeeping requirement)

TABLE 6.1 SUMMARY OF AIR REGULATORY HISTORY

NOC # (date)	NOC Condition	Description (for information only)	Applicability AOP Condition #
	#7	<p>Reporting Requirements: Pursuant to the requirements found in 40 CFR Part 63 Subpart ZZZZ, the owner or operator shall submit initial notification to ORCAA and to EPA Region 10, no later than 120 days after initial start-up of the Caterpillar C15 diesel engine in Building 9. The initial notification shall include the following items:</p> <ul style="list-style-type: none"> a. The name and address of the owner or operator; b. The address (i.e. physical location) of the affected source; c. An identification of the relevant standard that is the basis for of the notification and the source's compliance date; d. A brief description of the diesel engine including the intended use and horsepower rating; and, e. A statement whether the affected source is a major or an area source. 	Not an ongoing applicable requirement
<p>NOC 08NOC598 Issued: 7/1/2008</p>	#1	<p>Technical Specifications: Pollution generating equipment, air pollution control devices and operations at the facility shall be in accordance with the information and specifications described in the associated NOC application unless otherwise specified by condition in this Approval Order.</p>	Not an ongoing applicable requirement
	#2	<p>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.</p>	Not an ongoing applicable requirement
	#3	<p>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 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.</p>	<p>Applicable requirement</p> <p>AOP Conditions: 5.1a</p>
	#4	<p>Opacity Limit: Building 2 Spray Booth 1 and 2 shall operate at a maximum of 5% opacity as measured by EPA 40CFR Part 60 Appendix A Method 9.</p>	<p>Applicable requirement</p> <p>AOP Conditions: 5.1b</p>

TABLE 6.1 SUMMARY OF AIR REGULATORY HISTORY

NOC # (date)	NOC Condition	Description (for information only)	Applicability AOP Condition #
	#5	Operation Plan: The owner or operator shall update the facility Operations and Maintenance (O&M) plan to 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.	Applicable requirement AOP Conditions: 4.10 (O&M requirement)
	#6	Required Records: The following records shall be maintained on-site for no less than 5 years from origination and made available for inspection by ORCAA upon request: a. The O&M plan required by Condition 5; and, b. A copy of the Final Determination to 08NOC598.	Applicable requirement AOP Conditions: 7.1 (recordkeeping requirement) 7.6 (emission records requirement)
NOC 08NOC620 Issued: 9/5/2008	#1	Technical Specifications: Pollution generating equipment, air pollution control devices and operations at the facility shall be in accordance with the information and specifications described in the associated NOC application unless otherwise specified by condition in this Approval Order.	Not an ongoing applicable requirement
	#2	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.	Applicable requirement AOP Conditions: 4.20 (baghouse opacity limit)
	#3	Operation and Maintenance Plan: The owner or operator 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.	Applicable requirement AOP Conditions: 4.10 (O&M requirement)

TABLE 6.1 SUMMARY OF AIR REGULATORY HISTORY

NOC # (date)	NOC Condition	Description (for information only)	Applicability AOP Condition #
	#4	<p>Required Records: The following records shall be maintained on-site for no less than 5 years from origination and made available for inspection by ORCAA upon request:</p> <ul style="list-style-type: none"> a. The O&M plan required by Condition 3; and, b. A copy of the Final Determination to 08NOC620. 	<p>Applicable requirement</p> <p>AOP Conditions: 7.1 (recordkeeping requirement) 7.6 (emission records requirement)</p>
<p>NOC 08NOC630 Issued: 10/23/2008</p>	#1	<p>Technical Specifications: Pollution generating equipment, air pollution control devices and operations at the facility shall be in accordance with the information and specifications described in the associated NOC application unless otherwise specified by condition in this Approval Order.</p>	<p>Not an ongoing applicable requirement</p>
	#2	<p>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.</p>	<p>Not an ongoing applicable requirement</p>
	#3	<p>Operation Plan: The owner or operator shall update the facility Operations and Maintenance (O&M) plan to include procedures specific to operation of Building 2 Mixing Booth.</p>	<p>Applicable requirement</p> <p>AOP Conditions: 4.10 (O&M requirement)</p>
	#4	<p>Required Records: The following records shall be maintained on-site for no less than 5 years from origination and made available for inspection by ORCAA upon request:</p> <ul style="list-style-type: none"> a. The O&M plan required by Condition 3; and, b. A copy of the Order of Approval and Final Determination to 08NOC598. 	<p>Applicable requirement</p> <p>AOP Conditions: 7.1 (recordkeeping requirement) 7.6 (emission records requirement)</p>
<p>NOC 08NOC638 Issued: 11/24/2008</p>	#1	<p>Technical Specifications: Pollution generating equipment, air pollution control devices and operations at the facility shall be in accordance with the information and specifications described in the associated NOC application unless otherwise specified by condition in this Approval Order.</p>	<p>Not an ongoing applicable requirement</p>
	#2	<p>Operation Plan: The owner or operator shall update the facility Operations and Maintenance (O&M) plan to include procedures specific to operation of the Building 7 Annex welding emission control baghouse.</p>	<p>Applicable requirement</p> <p>AOP Conditions: 4.10 (O&M requirement)</p>

TABLE 6.1 SUMMARY OF AIR REGULATORY HISTORY

NOC # (date)	NOC Condition	Description (for information only)	Applicability AOP Condition #
	#3	<p>Required Records: The following records shall be maintained on-site for no less than 5 years from origination and made available for inspection by ORCAA upon request:</p> <ul style="list-style-type: none"> a. The O&M plan required by Condition 2; and, b. A copy of the Order of Approval and Final Determination to 08NOC638. 	<p>Applicable requirement</p> <p>AOP Conditions:</p>
<p>NOC 08MOD627 Issued: 5/14/2009</p>	#1	<p>Plant-Wide Emissions Limit: Plant-wide emissions of VOC shall not exceed 40 tons per consecutive 12-month period.</p>	<p>Applicable requirement</p> <p>AOP Conditions: 4.15 (VOC limit)</p>

7.0 STATEMENT OF BASIS

The following table provides the regulatory basis for each permit condition.

Table 7.1 Statement of Basis

Condition	Regulatory Basis
2.1 Duty to comply.	Standard Term or Condition Authority: WAC 173-401-620(2)(a); 40 CFR 63.1(c); 40 CFR 63.4(a)(1); 40 CFR 63.4(a)(2); 40 CFR 63.9(h)(3); 40 CFR 63.10(d)(1); 40 CFR 63.5773
2.2 Duty to Provide Information.	Standard Term or Condition Authority: WAC 173-401-620(2)(e)
2.3 Need to Halt or Reduce Activity Not a Defense.	Standard Term or Condition Authority: WAC 173-401-620(2)(b)
2.4 Property Rights.	Standard Term or Condition Authority: WAC 173-620(2)(d) Origin: WAC 173-620(2)(d)
2.5 Annual Fees.	Standard Term or Condition Authority: WAC 173-401-620(2)(f) Origin: ORCAA 3.2
2.6 Severability.	Standard Term or Condition Authority: WAC 173-620(2)(h) Origin: WAC 173-620(2)(h)
2.7 Federally Enforceable Requirements	Standard Term or Condition Authority: WAC 173-401-625 Origin: WAC 173-401-625
2.8 Permit Actions.	Standard Term or Condition Authority: WAC 173-401-620(2)(c) Origin: WAC 173-401-620(2)(c)
2.9 Permit Appeals.	Standard Term or Condition Authority: WAC 173-401-620(2)(i) Origin: WAC 173-401-620(2)(i)
2.10 Permit Renewal and Expiration.	Standard Term or Condition Authority: WAC 173-401-705, WAC 173-401-610 and 620(2)(j) Origin: WAC 173-401-705, WAC 173-401-610 and 620(2)(j)
2.11 Duty to Supplement or Correct Application.	Standard Term or Condition Authority: WAC 173-401-500(6) Origin: WAC 173-401-500(6)
2.12 Reopening for Cause.	Standard Term or Condition Authority: WAC 173-401-730 Origin: WAC 173-401-730

Condition	Regulatory Basis
2.13 Changes Requiring Permit Revision/Off Permit Changes.	Standard Term or Condition Authority: WAC 173-401-722; WAC 173-401-724 Origin: WAC 173-401-722; WAC 173-401-724
2.14 Permit Modifications.	Standard Term or Condition Authority: WAC 173-401-720; WAC 173-401-725 Origin: WAC 173-401-720; WAC 173-401-725
2.15 Emission Trading.	Standard Term or Condition Authority: WAC 173-401-620(2)(g) Origin: WAC 173-401-620(2)(g)
2.16 Compliance Maintenance.	Standard Term or Condition Authority: WAC 173-401-630(3) Origin: WAC 173-401-630(3)
2.17 False or Misleading Statements.	Standard Term or Condition Authority: WAC 173-401-520 Origin: State/Local Only: ORCAA 7.2; WAC 173-400-105(7)
2.18 Inspection and Entry.	Standard Term or Condition Authority: WAC 173-401-630(2) Origin: ORCAA 1.5(e)
2.19 Access for Inspection	Standard Term or Condition Authority: WAC 173-401-630(2) Origin: Local Only: ORCAA 1.5(e)
2.20 Source Testing	Standard Term or Condition Authority: WAC 173-401-630(1) Origin: WAC 173-400-105(4) Local Only: ORCAA 1.5(d)
2.21 Credible Evidence	Standard Term or Condition Authority: WAC 173-401-630(1) Origin: 40 CFR 51.212; 40 CFR 52.12; 40 CFR 53.33; 40 CFR 60.11; 40 CFR 61.12
2.22 Emergency as Affirmative Defense.	Standard Term or Condition Authority: WAC 173-401-645(2)&(5) Origin: WAC 173-401-645(2)&(5)
2.23 Unavoidable Excess Emissions Excused.	Standard Term or Condition Authority: WAC 173-401-630(1) Origin: WAC 173-400-107; ORCAA 8.7

Condition	Regulatory Basis
3.1 New Source Review	Actions Requiring Prior Approval Authority: WAC 173-401-600(1) Origin: WAC 173-400-110 ORCAA 6.1
3.2 Replacement or Substantial Alteration of Existing Control Equipment	Actions Requiring Prior Approval Authority: WAC 173-401-600(1) Origin: State/Local Only: WAC 173-400-114; ORCAA 6.1.10
3.3 Demolition and Asbestos Projects.	Actions Requiring Prior Approval Authority: WAC 173-401-600(1) Origin: Local Only: ORCAA 6.3
3.4 Demolition and Renovation Projects	Actions Requiring Prior Approval Authority: WAC 173-401-600(1) Origin: 40 CFR 61.145(b)
3.5 Temporary Sources	Actions Requiring Prior Approval Authority: WAC 173-401-635 Origin: ORCAA 6.1.1
3.6 Case by Case MACT	Actions Requiring Prior Approval Authority: WAC 173-401-600(1) Origin: 40 CFR 63.42(c); 40 CFR 63.1(c)(1); 40 CFR 63.4(a)(1)
3.7 MACT Reconstruction Approval	Actions Requiring Prior Approval Authority: WAC 173-401-600(1) Origin: 40 CFR 63.5(a)(1); 40 CFR 63.5(b)(3); 40 CFR 63.5(d)&(e)
3.8 MACT Reconstruction Notifications.	Actions Requiring Prior Approval Authority: WAC 173-401-600(1) Origin: 40 CFR 63.9(b)(4)(i); 40 CFR 63.9(b)(4)(v); 40 CFR 63.9(h)(5)
3.9 New Equipment / Process Change	Actions Requiring Prior Approval Authority: WAC 173-401-600(1) Origin: 40 CFR 63.5(b)(6)
3.10 Fragmentation	Actions Requiring Prior Approval Authority: WAC 173-401-600(1) Origin: 40 CFR 63.4(c)
4.1 Demolition and Renovation Projects	Facility-Wide & General Applicable Requirement Authority: WAC 173-401-600(1) Origin: 40 CFR 61.145(b); ORCAA 6.3.2

Condition	Regulatory Basis
4.2 Stratospheric Ozone	Facility-Wide & General Applicable Requirement Authority: WAC 173-401-600(1) Origin: 40 CFR 82, Subpart F
4.3 Emissions Detrimental to Persons or Property	Facility-Wide & General Applicable Requirement Authority: WAC 173-401-600(1) Origin: WAC 173-400-040(5); ORCAA 8.3(e)
4.4 Fallout	Facility-Wide & General Applicable Requirement Authority: WAC 173-401-600(1) Origin: WAC 173-400-040(2); ORCAA 8.3(e)(local only)
4.5 Odors (State)	Facility-Wide & General Applicable Requirement Authority: WAC 173-401-600(1) Origin: WAC 173-400-040(4); ORCAA 8.5(a)(local only)
4.6 Odors (ORCAA)	Facility-Wide & General Applicable Requirement Authority: WAC 173-401600(1) Origin: ORCAA 8.5(c)(local only)
4.7 Fugitive Emissions Control	Facility-Wide & General Applicable Requirement Authority: WAC 173-401-600(1) Origin: WAC 173-400-040(3)(a)
4.8 Fugitive Dust Control	Facility-Wide & General Applicable Requirement Authority: WAC 173-401-600(1) Origin: WAC 173-400-040(8)(a); ORCAA 8.3(c)(local only)
4.9 Concealment and Masking	Facility-Wide & General Applicable Requirement Authority: WAC 173-401-600(1) Origin: WAC 173-400-040(7); ORCAA 7.5(local only)
4.10 Maintenance and Repair of Air Pollution Control Equipment and Processes	Facility-Wide & General Applicable Requirement Authority: WAC 173-401-600(1) Origin: ORCAA 8.8
4.11 General Standards for Maximum Visual Emissions	Facility-Wide & General Applicable Requirement Authority: WAC 173-401-600(1) Origin: ORCAA 8.2(local only); WAC 173-400-040(1)
4.12 Sulfur Dioxide	Facility-Wide & General Applicable Requirement Authority: WAC 173-401-600(1) Origin: WAC 173-400-040(6)
4.13 General Particulate Standards for Combustion Units	Facility-Wide & General Applicable Requirement Authority: WAC 173-401-600(1) Origin: WAC 173-400-050(1); ORCAA 8.3(a)(local only)
4.14 General Emission Standards for Process Units	Facility-Wide & General Applicable Requirement Authority: WAC 173-401-600(1) Origin: ORCAA 8.3(a)

Condition	Regulatory Basis
4.15 VOC Emission Limit	Facility-Wide & General Applicable Requirement Authority: 08MOD627 Condition 1
4.16 Commercial/Military Vessel Coating Limit	Facility-Wide & General Applicable Requirement Authority: WAC 173-401-600(1) Origin: 01MOD181 Condition #5
4.17 Incidental Furniture Manufacturer Criteria	Facility-Wide & General Applicable Requirement Authority: WAC 173-401-600(1) Origin: 40 CFR 63.800(a); 40 CFR 63.801(a)
4.18 Material Use Limits	Facility-Wide & General Applicable Requirement Authority: WAC 173-401-600(1) Origin: 06NOC462 Conditions 2, 3, 4, 5, and 6
4.19 Diesel Engine Operating Limit	Facility-Wide & General Applicable Requirement Authority: WAC 173-401-600(1) Origin: 07NOC554 Condition 2
4.20 BACT Opacity Limits	Facility-Wide & General Applicable Requirement Authority: WAC 173-401-600(1) Origin: 07NOC554 Condition 2, 08NOC620 Condition 2, 08NOC598 Condition 4
5.1a Filter Exhaust	EU2 Applicable Requirement Authority: WAC 173-401-600(1) Origin: NOC#657 Condition #3
5.1b Opacity Requirement	EU2 Applicable Requirement Authority: WAC 173-401-600(1) Origin: NOC 08NOC598 Condition #4
5.2a Open Molding Emission Limit	EU1 Applicable Requirement Authority: WAC 173-401-600(1) Origin: 40 CFR 63.5698(a); 40 CFR 63.5698(b); 40 CFR 63.5695; 40 CFR 63.6(c); 40 CFR 63.6(f)(1)
5.2b Open Molding Implementation Plan	EU1 Applicable Requirement Authority: WAC 173-401-600(1) Origin: 40 CFR 63.5704(a)(4); 40 CFR 63.5707
5.2c Standards for Resin and Gel Coat Mixing Operations	EU1 Applicable Requirement Authority: WAC 173-401-600(1) Origin: 40 CFR 63.5731(a)&(b); 40 CFR 63.5695; 40 CFR 63.6(c); 40 CFR 63.6(f)(1)
5.2d Organic HAP Limit for Resin and Gel Coat Application Equipment Cleaning Operations	EU1 Applicable Requirement Authority: WAC 173-401-600(1) Origin: 63.5734(a)&(b); 40 CFR 63.5695; 40 CFR 63.6(c); 40 CFR 63.6(f)(1)

Condition	Regulatory Basis
5.2e Solvent Storage for Resin and Gel Coat Application Equipment Cleaning Operations	EU1 Applicable Requirement Authority: WAC 173-401-600(1) Origin: 63.5734(b); 40 CFR 63.5695; 40 CFR 63.6(c); 40 CFR 63.6(f)(1)
5.2f Carpet and Fabric Adhesive Operations Organic HAP Limit	EU1 Applicable Requirement Authority: WAC 173-401-600(1) Origin: 40 CFR 63.5740(a); 40 CFR 63.5695; 40 CFR 63.6(c); 40 CFR 63.6(f)(1)
6.1 Opacity Surveys	Compliance Monitoring Conditions Authority: WAC 173-401-615(1) Origin: WAC 173-401-615(1)(b)
6.2 Certified Opacity Reading Required	Compliance Monitoring Conditions Authority: WAC 173-401-615(1) Origin: WAC 173-401-615(1)(b)
6.3 Certified Opacity Reading Procedures	Compliance Monitoring Conditions Authority: WAC 173-401-615(1) Origin: WAC 173-401-615(1)(b)
6.4 Monitoring Complaints	Compliance Monitoring Conditions Authority: WAC 173-401-615(1) Origin: WAC 173-401-615(1)(b); 01MOD181 Condition #1
6.5 Fugitive Emissions and Dust Control Monitoring	Compliance Monitoring Conditions Authority: WAC 173-401-615(1) Origin: WAC 173-401-615(1)(b)
6.6 Sulfur Dioxide Emissions Monitoring	Compliance Monitoring Conditions Authority: WAC 173-401-615(1) Origin: WAC 173-401-615(1)(b)
6.7 Pollution Control Equipment Monitoring	Compliance Monitoring Conditions Authority: WAC 173-401-615(1) Origin: WAC 173-401-615(1)(b); NOC# 657 Condition #3 & #4; 40 CFR 63.5731(c); 40 CFR 63.5737(c); 40 CFR 63.5695; 40 CFR 63.6(c)
6.8 Monitoring Compliance with Emissions Limit	Compliance Monitoring Conditions Authority: WAC 173-401-615(1) Origin: WAC 173-401-615(1)(b); 01MOD181 Condition #3
6.9 Emission Calculations	Compliance Monitoring Conditions Authority: WAC 173-401-615(1) Origin: WAC 173-401-615(1)(b); 01MOD181 Condition #3

Condition	Regulatory Basis
6.10 Application Methods Audit Plan	Compliance Monitoring Conditions Authority: WAC 173-401-615(1) Origin: WAC 173-401-615(1)(b); 01MOD181 Condition #6
6.11 Particulate Testing Required	Compliance Monitoring Conditions Authority: WAC 173-401-615(1) Origin: WAC 173-401-615(1)(b)
6.12 Monitoring Compliance with the Commercial/Military Vessel Coating Limit	Compliance Monitoring Conditions Authority: WAC 173-401-615(1) Origin: WAC 173-401-615(1)(b); 01MOD181 Condition #5
6.13 Monitoring Compliance with Coating Limits	Compliance Monitoring Conditions Authority: WAC 173-401-615(1) Origin: WAC 173-401-615(1)(b); 06NOC462 Condition #7
6.14 Incidental Furniture Manufacturer Status	Compliance Monitoring Conditions Authority: WAC 173-401-615(1) Origin: WAC 173-401-615(1)(b); 40 CFR 63.800(a); 40 CFR 63.801(a)
6.15 Monitoring Exemptions from Open Molding Emission Limit.	Compliance Monitoring Conditions Authority: WAC 173-401-615(1) Origin: 40 CFR 63.5698(d); 40 CFR 63.5695; 40 CFR 63.6(c)
6.16 Monitoring Compliance with the Open Molding Emission Limit – Continuous Compliance	Compliance Monitoring Conditions Authority: WAC 173-401-615(1) 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; 40 CFR Part 63 Subpart VVVV Table 2; 40 CFR Part 63 Subpart VVVV Table 3
6.17 Monitoring for Resin and Gel Coat Application Equipment Cleaning Operations Organic HAP Limit	Compliance Monitoring Conditions Authority: WAC 173-401-615(1) Origin: 40 CFR 63.5737(a)&(b); 40 CFR 63.5695; 40 CFR 63.6(c)
6.18 Monitoring for Carpet and Fabric Adhesive Organic HAP Limit	Compliance Monitoring Conditions Authority: WAC 173-401-615(1) Origin: 40 CFR 63.5740(b); 40 CFR 63.5695; 40 CFR 63.6(c)
6.19 Determining Organic HAP Content of Materials	Compliance Monitoring Conditions Authority: WAC 173-401-615(1) Origin: 40 CFR 63.5758(a)

Condition	Regulatory Basis
6.20 Monitoring Diesel Engine Operating Hours	Compliance Monitoring Conditions Authority: WAC 173-401-615(1) Origin: 07NOC554 Condition #2
7.1 Retention and Availability of Records.	Recordkeeping Authority: WAC 173-401-615(2)(c) Origin: ORCAA 8.11
7.2 Record of Changes.	Recordkeeping Authority: WAC 173-401-615(2)(b) Origin: WAC 173-401-724(5)
7.3 Monitoring Records.	Recordkeeping Authority: WAC 173-401-615(2)(a) Origin: WAC 173-401-615(2)(a)
7.4 Record of Permit Deviations.	Recordkeeping Authority: WAC 173-401-615(3)(b) Origin: WAC 173-401-615(3)(b)
7.5 Availability of Emissions Records	Recordkeeping Authority: WAC 713-401-615(b)(3) Origin: Local Only: ORCAA 7.4
7.6 Emissions Records	Recordkeeping Authority: WAC 173-401-620(2)(e) Origin: WAC 173-400-105(1); ORCAA 8.11
7.7 Unlawful Reproduction or Alteration of Documents.	Recordkeeping Authority: WAC 173-401-630(1) Origin: Local Only: ORCAA 7.3
7.8 Display of Orders, Certificates and Other Notices.	Recordkeeping Authority: WAC 173-401-630(1) Origin: Local Only: ORCAA 1.3.11
7.9 Record of Complaints.	Recordkeeping Authority: WAC 173-401-615(1)(b)&(2) Origin: 01MOD181 Condition #1(c)
7.10 Record of Actions Taken	Recordkeeping Authority: WAC 173-401-615(1)(b)&(2) Origin: ORCAA 1.5(d)
7.11 Material Use and Volatile Organic Compound (VOC) Records	Recordkeeping Authority: WAC 173-401-615(2)(a) Origin: WAC 173-401-615(1)(b); 01MOD181 Condition #4 and #5; 40 CFR 63.800(a)
7.12 MACT Applicability Records	Recordkeeping Authority: WAC 173-401-615(2)(a) Origin: 40 CFR 63.1(b)(3); 40 CFR 63.10(b)(3)

Condition	Regulatory Basis
7.13 MACT Recordkeeping	Recordkeeping Authority: WAC 173-401-615(2)(a) Origin: 40 CFR 63.5770; 40 CFR 63.5767(a)&(b); 40 CFR 63.10(b)(1)
7.14 Open Molding Material Use Recordkeeping	Recordkeeping Authority: WAC 173-401-615(2)(a) Origin: 40 CFR 63.5704(a)(3); 40 CFR 63.5704(b)(3); 40 CFR 63.5767(c)(1); 40 CFR 63.5695; 40 CFR 63.6(c)
7.15 Recordkeeping for Exemptions from Open Molding Emission Limit	Recordkeeping Authority: WAC 173-401-615(2)(a) Origin: 40 CFR 63.5698(d); 40 CFR 63.5695
7.16 Equipment Cleaning Operations Organic HAP Limit Recordkeeping	Recordkeeping Authority: WAC 173-401-615(2)(a) Origin: 40 CFR 63.5737(a); 40 CFR 63.5695; 40 CFR 63.6(c)
7.17 Mixing and Cleaning Operations Recordkeeping	Recordkeeping Authority: WAC 173-401-615(2)(a) Origin: 40 CFR 63.5731(d); 40 CFR 63.5737(c); 40 CFR 63.5695; 40 CFR 63.6(c)
7.18 Carpet and Fabric Adhesive Operations Organic HAP Limit Recordkeeping	Recordkeeping Authority: WAC 173-401-615(2)(a) Origin: 40 CFR 63.5740(b); 40 CFR 63.5695; 40 CFR 63.6(c)
8.1 Certification of Reports.	Reporting Authority: WAC 173-401-630(1) Origin: WAC 173-401-630(1)
8.2 Annual Compliance Certification.	Reporting Authority: WAC 173-401-630(5) Origin: WAC 173-401-630(5)
8.3 Confidential Information	Reporting Authority: WAC 173-401-630(1) Origin: Local Only: ORCAA 1.6
8.4 Monitoring Reports.	Reporting Authority: WAC 173-401-615(3)(a) Origin: WAC 173-401-615(3)(a)
8.5 Reporting Deviations From Permit Conditions.	Reporting Authority: WAC 173-401-615(3)(b) Origin: WAC 173-401-615(3)(b); WAC 173-400-107(3); WAC 173-401-645

Condition	Regulatory Basis
8.6 Notification of Control Equipment Malfunction	Reporting Authority: WAC 173-401-615(3) Origin: WAC 173-401-615(2)
8.7 Notification of Complaint Received	Reporting Authority: WAC 173-401-630(1) Origin: WAC 173-401-615(2); 01MOD181 Condition #1(d)
8.8 Annual Inventory Report.	Reporting Authority: WAC 173-401-615(3) Origin: WAC 173-400-105(1); ORCAA 8.11
8.9 Source Test Plans.	Reporting Authority: WAC 173-401-630(1) Origin: WAC 173-401-630(1)
8.10 Source Test Reports.	Reporting Authority: WAC 173-401-630(1) Origin: WAC 173-401-630(1)
8.11 Notification of Compliance Status	Reporting Authority: WAC 173-401-630(1) Origin: 40 CFR 63.5761(a); 40 CFR 63.1(a)(11); 40 CFR 63 Subpart VVVV Table 7 (4)
8.12 MACT Compliance Reports	Reporting Authority: WAC 173-401-630(1) Origin: 40 CFR 63.5704(a)(5); 40 CFR 63.5704(b)(4); 40 CFR 63.5764(a), (b)&(c); 40 CFR 63.9(h)(3); 40 CFR 63.10(d)(1)
8.13 Changes to Notifications Submitted	Reporting Authority: WAC 173-401-630(1) Origin: 40 CFR 63.5761(b); 40 CFR 63.9(j); 40 CFR 63.10(d)(1)
10.1 Permit Shield.	Permit Shield Authority: WAC 173-401-640(1) Origin: WAC 173-401-640(1)
10.2 Inapplicable or Exempt Requirements.	Permit Shield Authority: WAC 173-401-640(2) Origin: WAC 173-401-640(2)
10.3 Exclusions	Permit Shield Authority: WAC 173-401-640(4) Origin: WAC 173-401-640(4)

