



2940-B Limited Lane NW
Olympia, WA 98502

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

March 13, 2014

Kelly Swan
Plant Manager
Westport Shipyard, Inc
PO Box 308
Westport, WA 98595

Dear Mr. Swan:

Olympic Region Clean Air Agency (ORCAA) received your application to renew the Air Operating Permit (AOP) for the Westport Shipyard facility located at 1807 N Nyhus Street in Westport, WA on March 7, 2014 (prior to the application due date). ORCAA reviewed the application and has deemed it administratively complete.

As detailed in Condition 2.10 of your permit (07AOP575), your current permit will not expire until the renewal permit has been issued or denied as long as you continue to respond to any written data requests regarding your renewal permit by the deadline specified by ORCAA.

If you have any questions, please call me at (360) 539-7610 extension 115.

Sincerely,

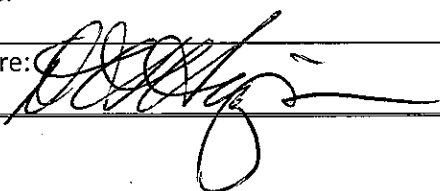
Jennifer DeMay
Engineer II

Cc: Sam Jones, Westport Shipyard

OLYMPIC REGION CLEAN AIR AGENCY

2940 B Limited Lane NW - Olympia, Washington 98502 - 360-539-7610 – Fax 360-491-6308

**AIR OPERATING PERMIT (AOP)
RENEWAL APPLICATION
Form A: General Information**

| | | | |
|---|------------------------|---|---------------------------|
| Company Name: Westport Shipyard Inc. | | For ORCAA use only | |
| Plant Name: Westport Shipyard | | File No: 474 | County No: 07 |
| Physical Address: 1807 N. Nyhus, Westport, WA. 98595 | | Source No: 701 | Application No: 14AOP1029 |
| Mailing Address (if different from above): PO Box 308, Westport, WA. 98595 | | Date Received: RECEIVED MAR 07 2014 ORCAA | |
| Current AOP Number: 07OP575 | | | |
| Issuance Date: 6 October 2009 | | Expiration Date: 6 October 2014 | |
| Do you request confidentiality for any of the records or information contained in this application? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> If yes, provide a separate copy of the application void of the materials considered confidential. Each page considered confidential must be individually identified by stamping "confidential" or similar method. Confidentiality can be claimed for information unique to the applicant and/or likely to adversely affect the competitive position of the applicant if released to the public or a competitor. | | | |
| Owner's name and agent: Westport Shipyard Inc. | | | |
| Plant site manager/contact: Kelly Swan | | | |
| Title: Plant Manager | Phone: 360-268-1800 | Email: kellyswan@westportshipyard.com | |
| RESPONSIBLE OFFICIAL CERTIFICATION I certify that I am the responsible official, as defined in WAC 173-401-200(27) for this facility. I further certify as required by WAC 173-401-520, that, based on information and belief formed after reasonable inquiry, the statements and information in this application are true, accurate, and complete. | | | |
| Responsible Official: Dave Hagiwara | | | |
| Title: General Manager | Phone: 360-452-5095 | Email: dhagiwara@westportshipyard.com | |
| Address: | | | |
| Signature:  | | Date: 3/6/14 | |

AIR OPERATING PERMIT (AOP) RENEWAL APPLICATION
Form B: Emissions Units

| Emissions Unit Number | Emissions Unit Name & Description | Air Pollution Control Equipment | Fuel(s) Used | Significant or Insignificant | |
|-----------------------|---|------------------------------------|--------------|--------------------------------|--|
| | | | | (S or I) | Basis |
| EU1 | Lamination and Plug fabrication Bldg. 2 Ventilation stack system | 3 exhaust units 10,000 ACFM each | Electrical | X S <input type="checkbox"/> I | |
| | Bldg. 9 Ventilation stack system. | 4 exhaust units 10,000, ACFM each | Electrical | | |
| EU2 | Spray Application Bldg. 5 Spray Booth | (2 exhaust units 18,000 ACFM each) | Electrical | X S <input type="checkbox"/> I | |
| EU3 | Bldg. 7 & 8 Hydronic floor heating Diesel Boilers (2 units at 2.5 MMBTU each) | N/A | Diesel | X S <input type="checkbox"/> I | NESHAP 40 CFR Part 63 Subpart DDDDD |
| EU4 | Diesel Emergency Generators Bldg. 2 & 5 (330 hp generator) | N/A | Diesel | X S <input type="checkbox"/> I | NESHAP 40 CFR Part 63 Subpart ZZZZ |
| | Bldg. 7 (643 hp generator) | | Diesel | | |
| | Bldg. 9 (717 hp generator) | | Diesel | | |
| IEU 1 | Propane Boilers for Hydronic floor heating | N/A | | <input type="checkbox"/> S X I | WAC 173-401-533 (2)(e) |
| | Bldg. 2 Propane Boiler hydronics floor heat (4 units at .31 MMBTU each) | | Propane | | Exempt under NESHAP 40 CFR Part 63 Subpart DDDDD and not subject to the rule |
| | Bldg. 9 Propane Boilers hydronics floor heat (9 units at .31 MMBTU each) | | Propane | | |
| | Bldg. 4 Propane boiler hydronics floor heat (2 units at .31 MMBTU each) | | Propane | | |

| Emissions Unit Number | Emissions Unit Name & Description | Air Pollution Control Equipment | Fuel(s) Used | Significant or Insignificant WAC 173-401-530 through -533 | |
|-----------------------|---|---------------------------------|--------------|--|--|
| | | | | (S or I) | Basis |
| IEU 2 | Propane Air/Space heaters Bldg. 1 propane space heaters (Air/space heaters (1Unit: .03 MMBTU) Bldg. 3 propane Space heaters (Air/space heaters (1Unit: .097 MMBTU) | N/A | Propane | <input type="checkbox"/> S <input checked="" type="checkbox"/> I | WAC 173-401-533 (2)(f) Exempt under NESHAP 40 CFR Part 63 Subpart DDDDD and not subject to the rule |
| IEU 2 | Propane Air/Space heaters Bldg. 4 propane Space heaters (Air/Space heater) (1Unit: .25 MMBTU) Bldg. 5 Propane space heaters (Air/Space heater for booth) (2 Units: 1.25 MMBTU each) | N/A | Propane | <input type="checkbox"/> S <input checked="" type="checkbox"/> I | WAC 173-401-533 (2)(f) Exempt under NESHAP 40 CFR Part 63 Subpart DDDDD and not subject to the rule |
| IEU 3 | Diesel Storage for Boiler (4000 gal. storage tank) | N/A | N/A | <input type="checkbox"/> S <input checked="" type="checkbox"/> I | WAC 173-401-533 (2)(c) |
| IEU 4 | Propane storage for boiler (30,000 gal storage tank) | N/A | N/A | <input type="checkbox"/> S <input checked="" type="checkbox"/> I | WAC 173-401-533 (2)(d) |
| IEU 5 | Bldg. 1 Powder Coat Evaporator | Evaporator unit | Propane | <input type="checkbox"/> S <input checked="" type="checkbox"/> I | WAC 173-401-530 (4) |
| IEU 6 | Bldg. 1 Powder Coat ovens 2 Units 1 Unit at .75 MMBTU 1 Unit at .50 MMBTU | N/A | Propane | <input type="checkbox"/> S <input checked="" type="checkbox"/> I | WAC 173-401-530 (4) |
| IEU 7 | Bldg. 2 Cabinet Shop woodworking | N/A | N/A | <input type="checkbox"/> S <input checked="" type="checkbox"/> I | WAC 173-401-532(55) |
| IEU 8 | Bldg. 7 Cabinet Shop woodworking | N/A | N/A | <input type="checkbox"/> S <input checked="" type="checkbox"/> I | WAC 173-401-532(55) |
| IEU 9 | Bldg. 7 Welding | N/A | N/A | <input type="checkbox"/> S <input checked="" type="checkbox"/> I | WAC 173-401-533 (2)(f) |
| IEU 10 | Bldg. 7 Metal Polishing | N/A | N/A | <input type="checkbox"/> S <input checked="" type="checkbox"/> I | WAC 173-401-532 (14) |
| IEU 11 | Bldg. 9 Acetone Still (30 gallon batch) | N/A | N/A | <input type="checkbox"/> S <input checked="" type="checkbox"/> I | WAC 173-401-533 (2)(o) |
| IEU 12 | Bldg. 7 Diesel storage for generator (4,000 gallons) | N/A | N/A | <input type="checkbox"/> S <input checked="" type="checkbox"/> I | WAC 173-401-533 (2)(c) |
| IEU 13 | Bldg. 5 Diesel storage for generator (55 gallons) | N/A | N/A | <input type="checkbox"/> S <input checked="" type="checkbox"/> I | WAC 173-401-533 (2)(c) |
| IEU 14 | Lumber storage | N/A | N/A | <input type="checkbox"/> S <input checked="" type="checkbox"/> I | WAC 173-401-530 (1)(d) |

| Emissions Unit Number | Emissions Unit Name & Description | Air Pollution Control Equipment | Fuel(s) Used | Significant or Insignificant WAC 173-401-530 through -533 | |
|-----------------------|--|---------------------------------|--------------|---|------------------------|
| | | | | (S or I) | Basis |
| IEU 15 | Bldg. 9 Resin storage tank 1 (6,200 gallons) | N/A | N/A | <input type="checkbox"/> S <input type="checkbox"/> I | WAC 173-401-533 (2)(f) |
| IEU 16 | Bldg. 2 Resin storage tank 2 (3,000 gallons) | N/A | N/A | <input type="checkbox"/> S <input type="checkbox"/> I | WAC 173-401-533 (2)(f) |
| IEU 17 | Paved/unpaved road dust | N/A | N/A | <input type="checkbox"/> S <input type="checkbox"/> I | WAC 173-401-530 |
| | | | | <input type="checkbox"/> S <input type="checkbox"/> I | |
| | | | | <input type="checkbox"/> S <input type="checkbox"/> I | |
| | | | | <input type="checkbox"/> S <input type="checkbox"/> I | |
| | | | | <input type="checkbox"/> S <input type="checkbox"/> I | |
| | | | | <input type="checkbox"/> S <input type="checkbox"/> I | |

Note 1: 2 emission units were removed from list no longer exist
(1) Bldg. 6 Propane space heaters 310,000 BTU/hr
(2) Bldg.3 Waterwall paint booth

Note 2: units Slight Change

- (1) EU3 Bldg. 7 Boilers actually 2 Units at 2.5 MMBTU for both Building 7 & 8
- (2) EU4 Bldg. 2 Emergency actually covers both Bldg. 2 and 5
- (3) EU5 Bldg. 2,4,9 Hydronics floor heat under 1.6 MMBTU and Propane so exempt under the NESHAP

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AIR OPERATING PERMIT (AOP) RENEWAL APPLICATION

Form C: Emissions

| Emissions Unit Number (from Form B) | Pollutants (all regulated pollutants including greenhouse gases) | Emissions | | | CAM Applicability | |
|--|--|---|--|---|---|---|
| | | Annual Potential Emissions (for each regulated air pollutants) | Have Potential Emissions Changed Since Submittal of Most Recent AOP Application? | Actual Emissions for Calendar Year 2013 | Annual Potential Emissions without regard to Control Device | CAM needed? If yes, submit a CAM Plan |
| EU1 Bldg. 2 & 9 Lamination and Plug Fabrication | Facility Wide PTE under 40TPY | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | | Facility Wide PTE under 40TPY | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| | TOTAL VOCs | | 4.61 TPY | | | |
| | Total HAPs | | 4.5 TPY | | | |
| | Styrene | | 4.5 TPY | | | |
| | Methyl Methacrylate | | 225 lbs/year | | | |
| | Total VOCs | Total PTE is under 40TPY Facility wide standard | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 5.6 TPY | Total PTE is under 40TPY Facility wide standard | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| | Total HAPs | | | 1.89 TPY | | |
| | Ethyl Benzene | | | 100 lbs/year | | |
| | Methyl ethyl Ketone | | | 744 lbs/year | | |
| | Toluene | | | .87 TPY | | |
| EU2 Bldg. 5 (Spary Booths) | Xylene | | | 498 lbs/year | | |
| | Methyl Isobutyl Ketone | | | 674 lbs/year | | |
| | Ethylene Glycol | | | 16 lbs/year | | |
| | Total Other VOCs | Total PTE is under 40TPY Facility wide standard | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 3.94 TPY | Total PTE is under 40TPY Facility wide standard | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| | Acetone | | | 1.8 TPY | | |
| | N-Butyl acetate | | | .51 TPY | | |

| Emissions Unit Number (from Form B) | Pollutants (all regulated pollutants including greenhouse gases) | Emissions | | CAM Applicability | | |
|---|--|--|--|---|---|---|
| | | Annual Potential Emissions (for each regulated air pollutants) | Have Potential Emissions Changed Since Submittal of Most Recent AOP Application? | Annual Potential Emissions for Calendar Year 2013 | Annual Potential Emissions without regard to Control Device | CAM needed? If yes, submit a CAM Plan |
| | Butyl alcohol | | | 0 | | |
| | Ethyl acetate | | | 424 lbs/year | | |
| | Isopropanol | | | .84 TPY | | |
| | N-butyl Alcohol | | | 297 lbs/year | | |
| | Monobutyl Ether Acetate | | | 503 lbs/year | | |
| | 1,2,4 Trimethylbenzene | | | 20 lbs/year | | |
| | Cyclohexanone | | | 20 lbs/year | | |
| | 1-Methoxy-2-Propanol | | | 94 lbs/year | | |
| | Benzyl Alcohol | | | 256 lbs/year | | |
| | 2-Methoxy-1-Methylethyl Acetate | | | 738 lbs/year | | |
| | Ethyl-3-Epoxypropionate | | | 219 lbs/year | | |
| | Benzyl Butyl Phthalate | | | 4 lbs/year | | |
| | Ethanol | | | 28 lbs/year | | |
| EU3 | | | | | | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| 2 Boilers for Bldg. 7 & Bldg 8 Hydronic Floor Heating | Total VOCs | .4 T/YR | | .4 T/YR | | |
| | Total HAPS | | | | | |
| Boiler #1 | | | | | | |
| | PM | .256 TPY | | .030 T/YR | | |
| | PM-10 | .259 TPY | | .069 T/YR | | |
| | VOC | .016 TPY | | .002 T/YR | | |
| | Methane (CH4) | .07 T/YR | | 16 LB/YR | | |
| | Nitrous Oxide (N2O) | .01 T/YR | | 3 LB/YR | | |

| Emissions Unit | Pollutants (all regulated) | Emissions | Emissions | CAM Applicability |
|---|----------------------------|---------------|---|---|
| | Carbon Dioxide (CO2) | 1785 T/YR | | 203 T/YR |
| | Sulfuric Acid (SO2) | .017 TPY | | .002 T/YR |
| | Carbon Monoxide (CO) | .388 TPY | | .045 T/YR |
| | Nitrogen Oxides (NOx) | 1.553 TPY | | .181 T/YR |
| Boiler #2 | | | | |
| | PM | .256 TPY | | .030 T/YR |
| | PM-10 | .259 TPY | | .069 T/YR |
| | VOC | .016 TPY | | .002 T/YR |
| | Methane (CH4) | .07 T/YR | | 16 LB/YR |
| | Nitrous Oxide (N2O) | .01 T/YR | | 3 LB/YR |
| | Carbon Dioxide (CO2) | 1785 T/YR | | 203 T/YR |
| | Sulfuric Acid (SO2) | .017 TPY | | .002 T/YR |
| | Carbon Monoxide (CO) | .388 TPY | | .045 T/YR |
| | Nitrogen Oxides (NOx) | 1.553 TPY | | .181 T/YR |
| EU4 Emergency Generators | | | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No |
| | Total VOCs | 0 T/YR | | 0 T/YR |
| | Total HAPs | | | |
| | Total Methane (CH4) | .11 TPY | | .001 TPY |
| | Total Nitrous Oxide (N2O) | .002 TPY | | .0001 TPY |
| | Total Carbon Dioxide (CO2) | 270 TPY | | 16 TPY |
| Emergency Generator 1. (Bldg. 2 & 5) | | | | |
| | Hydrocarbon (HC) | .05 TPY | | .003 TPY |
| | Sulfuric Acid (SO2) | .0008 TPY | | .00005 TPY |
| | Particulate Matter (PM) | .05 TPY | | .003 TPY |
| | Carbon Monoxide (CO) | .45 TPY | | .03 TPY |
| | Nitrogen Oxides (NOx) | 1.69 TPY | | .10 TPY |
| Emergency Generator 2. (Bldg. 7) | | | | |
| | Hydrocarbon (HC) | .05 TPY | | .003 TPY |
| | Sulfuric Acid (SO2) | .0008 TPY | | .00005 TPY |

| Emissions Unit | Pollutants (all regulated) | Emissions | | CAM Applicability |
|----------------------------------|----------------------------|-----------|------------|-------------------|
| | | | | |
| | Particulate Matter (PM) | .05 TPY | .003 TPY | |
| | Carbon Monoxide (CO) | .45 TPY | .03 TPY | |
| | Nitrogen Oxides (NOx) | 1.69 TPY | .10 TPY | |
| Emergency Generator 3. (Bldg. 9) | | | | |
| | Hydrocarbon (HC) | .06 TPY | .003 TPY | |
| | Sulfuric Acid (SO2) | .0010 TPY | .00006 TPY | |
| | Particulate Matter (PM) | .06 TPY | .004 TPY | |
| | Carbon Monoxide (CO) | .54 TPY | .03 TPY | |
| | Nitrogen Oxides (NOx) | 2.03 TPY | .12 TPY | |

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**AIR OPERATING PERMIT (AOP) RENEWAL APPLICATION
Form D: Applicability Determinations**

Facility Changes

| Are/were there any... | | If yes... |
|--|-----------------------------------|---|
| Notice of Construction Approval Orders that have been issued but not incorporated into the Air Operating Permit? | X Yes <input type="checkbox"/> No | Complete Form E for each Approval Order |
| Off-permit changes according to WAC 173-401-724? | <input type="checkbox"/> Yes X No | Complete Form F |
| Section 502(b)(10) changes according to WAC 173-401-722(2)? | <input type="checkbox"/> Yes X No | Complete Form F |
| New sources or modifications that did not require a Notice of Construction? | <input type="checkbox"/> Yes X No | Complete Form G |

New Applicable Requirements

| | | If yes... |
|---|-----------------------------------|--|
| Are there any new applicable requirements? | X Yes <input type="checkbox"/> No | *Emergency Generators *Diesel Boilers |
| Are there any inapplicable requirements for which the source would like to request to extend the permit shield? | <input type="checkbox"/> Yes X No | Complete Form H |
| Does the accidental release prevention regulation apply to the facility? (40 CFR Part 68) | <input type="checkbox"/> Yes X No | Attach a list of the regulated substances present in processes at the facility and identify the applicable program |

Current Compliance

| | | If no... |
|---|-----------------------------------|---------------------------|
| Is the source in compliance with all of the conditions of the current permit? | X Yes <input type="checkbox"/> No | Attach a compliance plan. |

Form D: Applicability Determinations, Page 2

Requested Changes

| Are there any requested changes to... | | If yes... |
|---|---|-----------------|
| Testing conditions? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | Complete Form I |
| Monitoring conditions (other than those being replaced by CAM)? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| Recordkeeping conditions? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| Reporting conditions? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| Non-applicable conditions? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| Any conditions? | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |

Other Changes/Corrections

| Are there any... | | If yes... |
|---|---|--|
| Changes to the Process Descriptions in the current Technical Support Document? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | Please attach details or marked up copy of current permit. 1: Section 2.2, 2.4, 2.5, 2.4 2: Emission unit change -Need to add EU3, EU4 |
| Changes to the Emission Unit Summary in the current Technical Support Document? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | |
| Changes to the Regulatory Determinations in the current Technical Support Document? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | |
| Changes to the Insignificant Emission Units listed in the current Technical Support Document? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | |
| Changes to the current Statement of Basis in the current Technical Support Document? | <input type="checkbox"/> Yes <input type="checkbox"/> No | |

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**AIR OPERATING PERMIT (AOP) RENEWAL APPLICATION
Form E: NOC Approval Orders**

For each NOC Approval Order that was issued but conditions were not incorporated into the AOP, list each new applicable requirement (including approval order requirements, NSPS, NESHAPs, etc). Please complete a separate form for each NOC Approval Order.

| | | |
|--|--|-------------------------------|
| NOC # 13NOC978 | | Date Issued: 9/16/2013 |
| Approval Order Condition # or Citation of Regulation | Condition or Description of Applicable Requirement | |
| Condition 1: Technical Specifications ORCAA 6.2.1(l) | <ul style="list-style-type: none"> - Metal Cleaning and Etching: Use Non-atomized hand pump spray, Alidox (30-40% sulfuric Acid, 10-20% phosphoric acid, .1-1.5% hydrofluoric acid), Secure Tec ES (1-5% phosphoric acid) - Evaporator: Samsco Water Evaporator with 100,000 BTU propane Adams Burner and evaporation rate of 8 gal/hr. Neutralization with Dubios OH 25 (20-30% sodium hydroxide) to balance the pH between 8-12. | |
| Condition 2: O&M Plan ORCAA 6.1.4 (a)(1); ORCAA Rule 4.3 (g) | <ul style="list-style-type: none"> - Procedures for operation and maintenance of metal cleaning and etching process to include procedures for minimizing fugitive emissions - Procedures to ensure that the evaporator is operated, maintained and repaired consistent with manufacturers specifications - Procedures for monitoring pH of neutralization tank | |
| Condition 3: Required Records ORCAA Rule 8.11 | <ul style="list-style-type: none"> - Maintain record in form suitable and readily available for expeditions review - Keep record for 5 years following date of each recorded action - Records of Maintenance checks and repairs conducted on the evaporator - Records of pH monitoring required in condition 2 - Copy of the Order of Approval | |
| ORCAA Rule 6.1, WAC 173-400-110, WAC 173-400-114 | Approval by ORCAA through NOC application is required prior to establishing or constructing any new source of emissions, or modifying an existing source. | |
| WAC 173-400-040 (8) ORCAA 7.5 | Prohibits installation or use of any means that conceals or masks an emission of an air contaminant that would otherwise violate any provisions of the chapter. | |
| ORCAA 8.8 | Requires air contaminant sources to keep any process and/or air pollution control equipment in good operation and repair | |
| WAC 173-400-105(1) | Maintenance of records relating to air pollutant emissions and submittal of an annual emissions inventory if required | |
| WAC 173-400-040(6), ORCAA 7.6 | Prohibits emissions of any air contaminant from any source that are detrimental to person or property | |
| WAC 173-400-107, ORCAA 8.7 | Requires source operators to demonstrate that excess emissions were unavoidable in order to obtain relief in an enforcement action | |

| | |
|--|---|
| WAC 173-400-040 (3), ORCAA 8.3 (e) | Prohibits particulate emissions from any source to be deposited, beyond the property under direct control for the owner or operator of the source, in sufficient quantity to interfere unreasonably with the use and enjoyment of the property upon which the material was deposited. |
| WAC 173-400-040 (9), ORCAA 8.3 (c) | Requires reasonable precautions be taken to prevent fugitive dust from becoming airborne |
| WAC 173-400-040 (4) | Requires that reasonable precautions be taken for controlling of fugitive emissions. |
| WAC 173-400-040 (5) | Use of "recognized good practices and procedures" for control of any odor which may unreasonably interfere with the use of enjoyment of another person's property. |
| ORCAA 8.5 | Requires reasonable available control techniques and measures be used to control odor-bearing gases. Prohibits emissions of any odor that unreasonably interferes with another person's use and enjoyment of their property. |
| ORCAA 8.11 | Requires: Maintenance records on the nature and amounts of emissions and other related information as deemed necessary by ORCAA; reporting emissions to ORCAA upon request |
| WAC 173-400-040 (7) | Prohibits emissions of sulfur dioxide from any emissions unit in excess of 1000 ppm of sulfur dioxide on a dry basis, corrected to 7% oxygen for combustion sources, and based on the average of any period of sixty consecutive minutes |
| WAC 173-400-040 (9), ORCAA 8.3 (c) | Requires reasonable precautions be taken to prevent fugitive dust from becoming airborne |

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**AIR OPERATING PERMIT (AOP) RENEWAL APPLICATION
Form H: New Requirements**

For each new requirement that might apply to your facility, list the requirement, the emission unit it might apply to, and the applicability determination.

| New Requirement | Emission Unit | Applies? | Reason | For inapplicable requirements, request permit shield? | Monitoring? |
|---|---------------|--|---|--|-------------|
| 40 CFR 63 Subpart DDDDD Boilers Major Area Source | EU3 | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | 2- Diesel Boilers at 2.05 MMBTU each both of which are under the heat input capacity ≤ 5 MMBtu/hr | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| 40 CFR 63 Subpart DDDDD Boilers Major Area Source | IEU2 | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | Propane Air/Space heaters These units do not fall into any of the categories | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| 40 CFR 63 Subpart DDDDD Boilers Major Area Source | IEU1 | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | 3 - Propane Boilers for Hydronic floor heating. All units are less than 1.6 MMBTU/hr | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| NESHAP 40 CFR Part 63 Subpart ZZZZ | EU4 | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | 3 – Diesel Emergency Generators | <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | |
| | | <input type="checkbox"/> Yes <input type="checkbox"/> No | | <input type="checkbox"/> Yes <input type="checkbox"/> No | |
| | | <input type="checkbox"/> Yes <input type="checkbox"/> No | | <input type="checkbox"/> Yes <input type="checkbox"/> No | |
| | | <input type="checkbox"/> Yes <input type="checkbox"/> No | | <input type="checkbox"/> Yes <input type="checkbox"/> No | |
| | | <input type="checkbox"/> Yes <input type="checkbox"/> No | | <input type="checkbox"/> Yes <input type="checkbox"/> No | |
| | | <input type="checkbox"/> Yes <input type="checkbox"/> No | | <input type="checkbox"/> Yes <input type="checkbox"/> No | |

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 ~~299~~ 45 tons. Bulk resin is stored in two on-site storage tanks (one ~~62,000~~ 6,200 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). This operation was changed see NOC13NOC978~~

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 two boilers boiler~~ and ~~two three~~ emergency generators. The boiler uses a 4000-gallon storage tank, located near Building #7. There are ~~two three~~ 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 two~~ storage tanks located ~~throughout the on 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.~~ **The first tank has a 30,000 gallon capacity and is located on the South East corner of the property. The second tank has a 1000 gallon capacity and is at the South West corner of building 9.** Westport Shipyard uses approximately ~~68,000~~ **125,000** 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 three units at 30,000~~ **10,000** acfm ventilation units 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

PAGE 3 change to reflect 13NOC978, change in storage tanks for diesel, change in propane usage, change in bldg. 2 ventilation system clarifying 3 – 10,000 cfm units

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 ~~was~~ includes four exhaust units each rated at ~~7,000~~ 10,000 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~~ Unit removed

PAGE 4 correction to exhaust units in Bldg. 9 and removed Building 3 Waterwall

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.~~
Process changed under 13NOC978
- 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. **Unit no longer exhausts to the outside air.**
- After coating, the metal pieces are cured in a propane-fired oven. ~~The oven is rated at 0.4 MMBtu/hr~~
The first oven is rated at .5 MMBTU
The second oven is rated at .75 MMBTU

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)~~ two (2) ~~440,000 btu/hr~~ 2,500,000 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~~ 310,000 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~~ **Removed from building**

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 two boilers are rated at 2.05 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~~ #4 and are considered insignificant emission units per WAC 173-401-533(2)(f).

2.7 Assembly

Location:

Building #7 Assembly

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 & 2 Emergency Diesel Generator

Building #9 Emergency Diesel Generator

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.

Technical

Need to add EU3

Need to add EU4

PAGE 8 corrections

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 (Change to 10,000 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 EMISSION UNITS

| Process | IEU Name | Size/Capacity | Basis for IEU Designation |
|----------------|---|---|---------------------------|
| Space heating | #1 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 310,000 | WAC 173-401-533(2)(e) |
| | Building #1 Propane space heaters | 310,000 Btu/hr 40,000 | WAC 173-401-533(2)(r) |
| | Building #3 Propane space heaters | 340,000 Btu/hr 97,000 | WAC 173-401-533(2)(r) |
| | Building #4 Propane space heaters | 310,000 Btu/hr 250,000 | WAC 173-401-533(2)(r) |
| | Building #5 Propane air preheater (2 units) | 340,000 Btu/hr 1,250,000 | WAC 173-401-533(2)(r) |
| | #2. Building #6 Propane space heaters | 310,000 Btu/hr | WAC 173-401-533(2)(r) |
| | Diesel storage (boiler) | 4000 gallons | WAC 173-401-533(2)(c) |
| | Propane storage (Building #7) | 30,000 gallons | WAC 173-401-533(2)(d) |
| | Powder coating | #5 Nitric acid rinse tank | Emissions below PQL |
| Spray booth | | Emissions below PQL | WAC 173-401-530(4) |
| Oven (2 units) | | Emissions below PQL | WAC 173-401-530(4) |
| Woodworking | Building #2 cabinet shop | | WAC 173-401-532(55) |
| | Building #7 cabinet shop | | WAC 173-401-532(55) |
| Spray painting | #4 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) |
| | #6 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 4,000 | 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 6,200 | 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) |