ORDER OF APPROVAL

NOTICE OF CONSTRUCTION 23NOC1586

ISSUED to Stabi-Craft Marine USA, Inc on

APR 12 2023

This Order of Approval ("Order") is issued in accordance with Olympic Region Clean Air Agency ("ORCAA") Rule 6.1 and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6.

Conditional approval to operate a marine vessel surface coating operation located at 2140 W. 18th Street, in Port Angeles ("Approved Location"), for operation solely as described in the associated Notice of Construction ("NOC") application 23NOC1586, is hereby GRANTED to Stabi-Craft Marine USA, Inc ("Applicant"), subject to the Conditions of Approval listed below.

This Order and the Conditions of Approval herein remain in effect for the life of the Approved Equipment as used at the Approved Location and shall be binding on Applicant, current owners and operators of the equipment, and Applicant's heirs, successors and assigns unless amended or superseded by a subsequent Order issued by ORCAA or unless the equipment is permanently shut down. The Applicant must notify any subsequent owner, operator, heirs, successor or assigns of this Order and the Conditions of Approval herein.

Conditions of Approval established in this Order shall be enforceable in addition to any applicable state, local and federal regulations, or standards in existence now or in the future. Compliance with the conditions of this Order do not relieve the Applicant or any owner or operator from compliance with ORCAA Regulations, chapter 70A.15 of the Revised Code of Washington, or any other emissions control requirements, nor from any penalties for failure to comply with the same. Applicant may appeal this Order to the Pollution Control Hearings Board ("PCHB") by filing a written appeal with the PCHB and serving a copy upon ORCAA within thirty (30) days of receipt of this Order.

This Order supersedes Order 18NOC1297 and is GRANTED, for the Approved Location, subject to the following Conditions of Approval:

1. **Approved Equipment.** The marine vessel surface coating operation as described in Notice of Construction application No. 23NOC1586 and the associated Final Determination is approved for construction and operation subject to conditions in this Order of Approval. [Regulatory Basis: ORCAA 6.1(a); ORCAA 6.1.2(l); 40 CFR part 52.2470(c), Table 6]

2. **Preapproval Required.** Prior approval by ORCAA may be required for the following as specified in ORCAA Rule 6.1:
   a. Construction, installation, or establishment of any stationary source;
   b. Modification to any existing stationary source;

c. Replacement or substantial alteration of emission control technology installed on an existing stationary source; or,
d. Deviations from the approved plans, drawings, data, and specifications of the stationary sources listed in Table 1.

Table 1 Stationary sources located at Stabi-Craft

Emission Unit	Specifications:
Surface Coating Operation Controlled by Spray Booth 1 (In extension outside original building)	**Custom Downdraft Spray Booth** • Spray Booth's exhaust must be directed to a filter to capture paint overspray • Spray Booth dimensions: 16' wide x 12' high x 30' long • 187.5 sq. ft. filter area • 25" x 20" UL Class II paint arrestor filters
Surface Coating Operation Controlled by Spray Booth 2 (West of Spray Booth #1)	Same as Spray Booth 1

[Regulatory Basis: ORCAA 6.1(a); ORCAA 6.1.2(l); WAC 173-400-110(2); WAC 173-400-111(10)]

3. **Material Limits.** The cumulative amount of materials associated with the marine vessel surface coating operation applied during any 12-month consecutive month period must not exceed 1,400 gallons for all materials containing volatile organic compounds (VOCs). [Regulatory Basis: ORCAA 6.1.4(a)(1); ORCAA 6.1.2(l); WAC 173-400-113]

4. **Opacity Limit.** The Facility must be operated and maintained such that visible emissions from Facility stacks, vents, exits, and openings from spray coating do not exceed an average of five percent (5%) opacity for any 6 consecutive minutes as determined by EPA Method 9 (Title 40 CFR Part 60, Appendix A Method 9). Visible emissions will trigger prompt (within a week) action to initiate maintenance and/or repair of the associated control device and eliminate opacity. Maintenance and repair actions must be documented and available for inspection.
[Regulatory Basis: ORCAA 6.1.4(a)(2); ORCAA 8.8; WAC 173-400-113(2)]

5. **Coatings Changes Requiring Review.** The use of new TAP-containing materials associated with the marine vessel surface coating operation, other than minor formula changes, requires pre-approval through ORCAA.
[Regulatory Basis: ORCAA 6.1.4(a)(1); WAC 173-460-070]

6. **Filters Requirements.** The approved spray booths must be equipped with properly seated exhaust filters that cover all openings of the exhaust plenum and have a combined efficiency demonstrated to achieve at least 98% capture of paint overspray.
[Regulatory Basis: ORCAA 6.1.4(a)(2); ORCAA 8.8; WAC 173-400-113(2)]

7. **Spray Booth Requirements.** All spray coating operations at the Facility must be confined to the approved spray booths meeting the specifications described in Table 1. The spray booths must be operated and maintained as necessary to keep air pollution control technology in good operating condition.
[Regulatory Basis: ORCAA 6.1.4(a)(2); ORCAA 8.8; WAC 173-400-113(2)]

8. **Stack Requirements.** The exhaust stack of each spray booth must have a vertical discharge to the atmosphere at least six feet above the peak height of the building. There must 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.
[Regulatory Basis: ORCAA 6.1.4(a)(2); WAC 173-400-113]

9. **Operation & Maintenance Requirements:** The following is required:
   a. Except for minor touch up work (pieces 9 square feet or less), all spray coating operations must be conducted in an enclosure comprised of at least three sides and a ceiling that captures and exhausts all overspray through exhaust filters meeting the requirements of this order.
   b. Approved spray booths must be equipped with properly seated exhaust filters that cover all openings of the exhaust plenum and are rated at least 98 percent efficient.
   c. Cleaning spray guns in such a way that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects the used gun cleaning solvent.
   d. Keeping volatile materials in closed containers when not being used.
   e. Operating and maintaining the spray booths consistent with the manufacturer's recommendations.
   f. Storing all spray coating operation-related solvents, solvent-containing cloths, or other materials used for surface preparation in closed, airtight containers.
   g. Minimizing and promptly cleaning up all volatile material spills and leaks.
   h. Monitoring filters each day the booths operate and replacing whenever damaged or loaded with particulate build-up to an extent that jeopardizes the effectiveness of the spray booths in capturing and controlling emissions.

   [Regulatory Basis: ORCAA Rule 6.1.4(a)(2); ORCAA Rule 4.3(g); 40 CFR part 52.2470(c), Table 6]

10. **Recordkeeping:** Copies of records must be maintained for a minimum period of five years from the date of origin, and kept on-site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after the date the record is generated and may be kept off-site after that two-year period, provided the records can be made available to ORCAA within 15-days from being requested. At a minimum, records must include the following:

a. Purchase invoices indicating the amount of VOC and TAP-containing materials used in spray coating operations including the date of purchase and corresponding product identification numbers.
b. Monthly record of the actual cumulative amount of VOC and TAP-containing materials (used in marine vessel coating operations) used in terms of gallons per month and gallons per previous 12-consecutive months.
c. Safety Data Sheets (SDS) for all VOC and TAP-containing materials on site associated with surface coating operations.
d. Records sufficient to verify the average overspray arrestance (filtration) ratings of each exhaust filter material type. Published filter efficiency data provided by filter vendors or laboratories may be used to demonstrate compliance with this requirement.

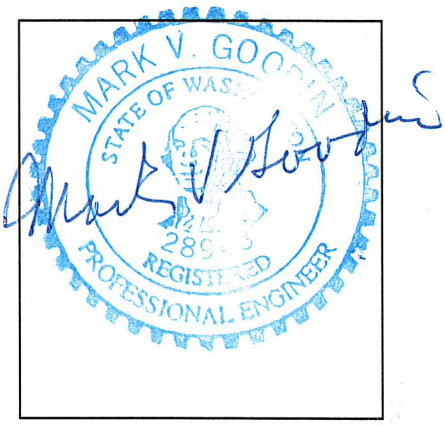
[Regulatory Basis: ORCAA 8.11; 40 CFR part 52.2470(c), Table 6]

Mark V Goodin for Aaron Manley 4/7/23

PREPARED BY: Aaron Manley, Engineer II Date

Mark V Goodin 4/7/23

REVIEWED BY: Mark V. Goodin, PE Date



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

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

www.ORCAA.org

Executive Director
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NEW SOURCE
FINAL DETERMINATION to APPROVE:

Surface Coating Operation

Stabi-Craft Marine USA, Inc

23NOC1586

March 22, 2023

Table of Contents

NOTICE OF CONSTRUCTION
FINAL DETERMINATION TO APPROVE

Olympic Region Clean Air Agency

Issued to:	**Stabi-Craft Marine USA, Inc**	**County:**	**9 - Clallam**
Location:	**2140 W. 18th Street** **Port Angeles**	**Source:** **RC:**	**9** **5**
Application #:	**23NOC1586**	**File:**	**675**
Prepared on:	**March 22, 2023**		

1. Summary

Stabi-Craft Marine USA, Inc (Stabi-Craft) seeks approval from Olympic Region Clean Air Agency (ORCAA) to establish a marine vessel surface coating operation controlled by two spray booths at 2140 W. 18th Street, Port Angeles, Washington. The surface coating operation qualifies as a stationary source of regulated air pollutants and as such, requires prior approval through ORCAA. ORCAA staff reviewed Stabi-Craft's proposal and concluded it may be conditionally approved. Recommended conditions of approval are detailed in Section 16 of this Final Determination report.

2. Regulatory Background

Pursuant to the Washington Clean Air Act under chapter 70A.15 of the Revised Code of Washington, ORCAA's Rule 6.1 and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6[1] require New Source Review (NSR) for new stationary sources of air pollution (referred to as new sources) in ORCAA's jurisdiction. NSR is also required prior to installing, replacing, or substantially altering any air pollution control technology. NSR generally refers to the process of evaluating air quality impacts and the likelihood of compliance with applicable air regulations and standards. NSR and approval of an air permit by ORCAA is required prior to commencing construction or modification of any new source or prior to installing, replacing, or substantially altering air pollution control technology. The goal of NSR is to assure compliance with applicable air regulations and standards, including equipment performance standards and ambient air quality standards.

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[1] A State Implementation Plan (SIP) is a collection of regulations and documents used by a state, territory, or local air district to implement, maintain, and enforce the National Ambient Air Quality Standards, or NAAQS, and to fulfill other requirements of the federal Clean Air Act. The Clean Air Act requires the EPA to review and approve all SIPs. ORCAA's SIP was last approved by EPA in 1995.

NSR is initiated by a project proponent submitting an air permit application referred to as Notice of Construction (NOC) application[2], which provides ORCAA information on the proposed project of sufficient detail to characterize air impacts. NOC applications are posted on ORCAA's website and may undergo a public notice and comment period if requested by the public or if emissions increases trigger an automatic public notice. Approval of a NOC in an attainment or unclassifiable area[3] is contingent on verifying a proposed project meets the following criteria from ORCAA's Rule 6.1 and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6:

1. ***Performance Standards*** **-** The new stationary source will likely comply with applicable air-performance standards such as federal new source performance standards (NSPS), national emission standards for hazardous air pollutants (NESHAPs), or any performance standards adopted under chapter 70A.15 RCW;
2. ***BACT*** **-** The new stationary source will employ "Best Available Control Technology" (BACT) to control all air pollutants emitted;
3. **RACT** – Replaced or substantially altered air pollution control technology meets the standard of "Reasonably Available Control Technology" (RACT) as defined in ORCAA Rule 1.4;
4. ***Ambient Air Quality*** **–** Emissions from the new stationary source will not cause or contribute to a violation of any ambient air quality standard;
5. ***Federal Air Permitting Requirements*** **-** The new stationary source secures all applicable federal air permits that may apply; and,
6. ***Air Toxics*** **-** If there are increases in toxic air pollutant (TAP) emissions, the requirements of Washington's Controls for New Sources of Toxic Air Pollutants under Chapter 173-460 WAC are met.

In this case, Stabi-Craft is proposing to surface coat marine vessels in two spray booths at their facility located in Port Angeles, Washington. The operation qualifies as an increase in air emissions because they are applying new materials in their operation, which emit volatile organic compound air emissions and requires permitting and pre-approval through a Notice of Construction permit.

3. Facility Background

The facility is owned by the port and has operated under various businesses since at least 2003, when it was first permitted with ORCAA. The spray booths have been used to control emissions from coating operations including coating of park benches in the past. This is Stabi-Craft's first

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[2] There are two categories of NOC applications: Notice of Construction (NOC) and Notice of Construction Revision (NOR). NOCs are required for new or modified sources, new control technology, replacing an existing stationary source or control technology, and substantially altering control technology. NORs are required when an owner or operator requests a revision to an existing air permit issued by ORCAA.

[3] Unclassified area or "attainment area" means an area that has not otherwise been designated by EPA as nonattainment with ambient air quality standards for a particular regulated pollutant. Attainment area means any geographic area in which levels of a given criteria air pollutant (e.g., ozone, carbon monoxide, PM10, PM2.5, and nitrogen dioxide) meet the health-based National Ambient Air Quality Standards (NAAQS) for that pollutant. An area may be an attainment area for one pollutant and a nonattainment area for others.

permit with ORCAA. Westport and CRTC previously occupied this space. CRTC currently operates other buildings under ORCAA permits within the same industrial complex. A history of previous permittees and permitting actions specific to the building Stabi-Craft will operate out of are described in Table 3 below.

Table 3. Permitting History with ORCAA

Permit # (date)	Permittee and Description	Status
03NOC339 (6/29/2004)	Westport- ORCAA conditionally approved the installation of the three Goldenwest spray booths and the pneumatic dust collection system controlled by the Donaldson baghouse.	Superseded
08NOC591 (5/19/2008)	Westport- ORCAA conditionally approved the two Finishing Consultants spray booths and the MAC2FLO cartridge system.	Superseded
09MOD658 (4/20/2009)	Westport- ORCAA conditionally approved Westport's request to voluntarily limit emissions of VOC, HAP, and TAP as verified through material usage reporting	Superseded
11MOD812 (3/7/2011)	Westport- ORCAA reviewed the application of materials containing isocyanates and methacrylates and granted conditional approval to apply these materials.	Superseded
11NOC842 (6/3/2011)	Westport- ORCAA conditionally approved Westport Shipyard's request to install a Cantech cartridge filter system. The approval erroneously stated that the system would replace the existing cartridge filter system.	Superseded
12MOD891 (8/2/2012)	Westport- ORCAA conditionally approved a revision in conditions previously issued in 11NOC842. 12MOD891 superseded 03NOC339, 08NOC591, 09MOD658, 11MOD812, and 11NOC842, making it the only order from ORCAA regulating air emissions from this facility.	Superseded
18NOC1297 (1/16/2019)	CRTC- Repurposed spray booths to spray coat park benches. Superseded 12MOD981 and documented the change in ownership from Westport to CRTC.	Superseded

4. Facility Description

Stabi-Craft is an established boat builder and the two paint booths will be used to facilitate the finishing of aluminum leisure boats. Stabi-Craft verified there will be no welding at the Facility. Hulls and subassemblies will be brought into the spray booths and coated with marine paints and coatings using either spray guns or hand-application methods. The spray booths are described in Table 4.1 below.

Table 4.1: Emission Units

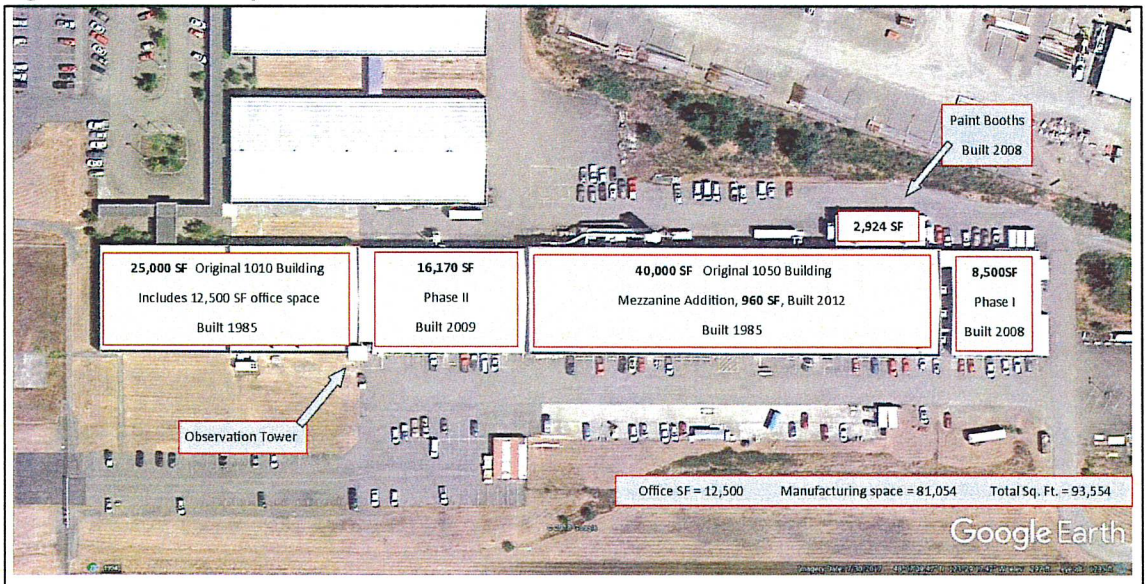
Emission Unit		Description
Surface Coating Operation Controlled by Spray Booth 1	Type	Spray Booth #1 (in extension outside original building)
	Manufacturer & Model #	Finishing Consultants Custom Downdraft
	Specifications	16' wide x 12' high x 30' long Propane heated up to 70 °F., 3.1 MBtu/hr maximum 42" diameter stack 48000 cfm airflow 187.5 sq. ft. filter area 25" x 20" UL Class II paint arrestor filters

Surface Coating Operation Controlled by Spray Booth 2	Type	Spray Booth #2 (west of SB1)
	Manufacturer & Model #	See SB1
	Specifications	See SB1

Figure 4.1: Facility Location

-Imagery ©2023 CNES/ Airbus, Maxar Technologies, USDA/FPAC/GEO, Map data ©2023
-Annotated by ORCAA staff

Figure 4.2: Site Map



-Site Map provided by previous applicant as part of 18NOC1297 permitting process

5. Project Description

This permitting action will permit the spray coating operation controlled by the two identical spray booths described in Table 4.1 above. The operation will apply coatings and formulations not previously applied at this location.

3. Emission Increases

Table 6. Emission Increases (Project Emissions)

Pollutant	Classification (Criteria[a]/HAP[b]/TAP[c])	Emission Rate (lb/yr)	Emission Rate (lb/day)	Emission Rate (lb/hr)
PM (Total Particulate)	-	3.31E+01	9.08E-02	3.78E-03
PM_{10} (Total Particulate) (<= 10 um)	Criteria	3.31E+01	9.08E-02	3.78E-03
$PM_{2.5}$ (Fine Particulate) (<=2.5 um)	Criteria	3.31E+01	9.08E-02	3.78E-03
VOC[d] (Volatile Organic Compounds as VOC)	-	9.81E+03	2.69E+01	1.12E+00
Hazardous Air Pollutants (total HAP)	HAP	3.83E+03	1.05E+01	4.37E-01
Toxic Air Pollutants (total TAP)	TAP	4.54E+03	1.24E+01	5.18E-01
1,2,4 Trimethylbenzene	TAP	3.46E+01	9.47E-02	3.95E-03
Ethylene glycol monobutyl ether	TAP	4.69E+02	1.28E+00	5.35E-02
Benzene	HAP, TAP	1.88E+01	5.14E-02	2.14E-03
Cumene	HAP, TAP	3.46E+00	9.47E-03	3.95E-04
Ethylbenzene	HAP, TAP	2.46E+02	6.75E-01	2.81E-02
Ethylene glycol monobutyl ether	TAP	4.69E+02	1.28E+00	5.35E-02
Hexamehtylene Diisocyanate	HAP, TAP	1.25E+01	3.43E-02	1.43E-03
Methyl Ethyl Ketone	HAP, TAP	1.89E+03	5.17E+00	2.15E-01
Propylene Glycol Monomethyl Ether	TAP	2.05E+02	5.62E-01	2.34E-02
Silica (Crystalline Respirable)	TAP	2.53E-01	6.94E-04	2.89E-05
Tertiary-butyl acetate	TAP	3.06E+01	8.37E-02	3.49E-03
Toluene	HAP, TAP	3.32E+02	9.10E-01	3.79E-02
Xylenes	HAP, TAP	1.33E+03	3.63E+00	1.51E-01

[a] EPA has established national ambient air quality standards (NAAQS) for six of the most common air pollutants—carbon monoxide, lead, ground-level ozone, particulate matter, nitrogen dioxide, and sulfur dioxide—known as "criteria" air pollutants (or simply "criteria pollutants").

[b] HAP means Hazardous Air Pollutant. Hazardous Air Pollutants are those known to cause cancer and other serious health impacts and are regulated under the federal Clean Air Act.

[c] TAP means any toxic air pollutant regulated in Washington and listed in WAC 173-460-150.

[d] VOC is regulated as a Criteria Air Pollutant because it is a precursor to Ground Level Ozone (O_3)

7. Administrative Requirements for NOC Applications

NOC applications are subject to filing fees according to ORCAA Rule 3.3(b) and may incur additional NOC processing fees at an hourly rate according to ORCAA Rule 3.3(c). Applicable NOC filing fees for Stabi-Craft's NOC application were paid prior to ORCAA commencing processing of the application. Additional NOC processing fees may apply and will be determined and assessed prior to issuing a Final Determination and the Approval Order (a.k.a.: Air Permit).

NOC applications are subject to a 15-day public notice and an opportunity to request a 30-day public comment period and opportunity for a public hearing. Public notice of Stabi-Craft's NOC application was posted on ORCAA's website on February 28, 2023. The time period for filing comments on the application and requests for a public comment period expired on March 15, 2023. There were no comments received, requests for a public comment period, nor request for a public hearing.

8. SEPA Review

The State Environmental Policy Act (SEPA) under Chapter 197-11 WAC is intended to provide information to agencies, applicants, and the public to encourage the development of environmentally sound proposals. The goal of SEPA is to assure that significant impacts are mitigated.

The project is exempt from SEPA requirements per WAC 197-11-800(3) since it involves only repair, remodeling, maintenance or minor alteration of existing structures, equipment or facilities and will involve no material expansions or changes in use. The current project does not involve any material expansion.

9. Criteria for Approval

ORCAA's Rule 6.1 and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6, establish the following general criteria for approving new stationary sources and modifications to existing stationary sources of air pollution in ORCAA's region:

1. ***Performance Standards*** **-** Any new stationary source or modification will likely comply with applicable air-performance standards such as the federal new source performance standards (NSPS), national emission standards for hazardous air pollutants (NESHAPs), and any performance standards adopted under chapter 70A.15 RCW;
2. ***BACT*** **-** The new or modified stationary source is controlled to a level that meets the standard of "Best Available Control Technology" (BACT);
3. ***Ambient Air Quality*** **–** Any increase in air emissions will not cause or contribute to violation of any ambient air quality standard;
4. ***Federal Air Permitting Requirements*** **–** All applicable federal air permits, if required, are secured;
5. ***Washington Air Toxics Regulations*** **-** If there are increases in toxic air pollutant (TAP) emissions, the requirements of Washington's Controls for New Sources of Toxic Air Pollutants under Chapter 173-460 WAC are met; and,
6. ***Public Outreach*** **–** Public notice and comment requirements in ORCAA's regulations and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6 are met.

The following sections provide more detail on each criterion.

10. Applicable Performance Standards (Summary)

ORCAA's Rule 6.1.4(a)(1) and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6, require a finding that any new or modified stationary source will likely comply with applicable state, federal and local performance standards for air emissions including emission standards adopted under chapter 70A.15 RCW, emissions standard of ORCAA, and federal emission standards including New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAP), and National Emission Standards for Hazardous Air Pollutants for Source Categories (MACT standards). The performance standards in Table 10.1 were determined applicable to the proposed coating operation. The performance standards in Table 10.2 were determined relevant to the proposed coating operation, but inapplicable. A comprehensive list of applicable performance standards that apply to all stationary sources of air pollution located at the facility, as well as general air regulations and standards that apply, are included in the Appendix.

Table 10.1: Applicable Performance Standards specific to the proposed Coating Operation

Title Citation	Brief Description (Consult rule/regulation for specific requirements)	discussion/determination
ORCAA Requirements, Prohibitions, and Performance Standards *ORCAA Regulations 4, 7 and 8*	These general regulations may apply to any source or emission unit causing air pollution.	Compliance likely
General Regulations for Air Pollution Sources *WAC Chapter 173-400*	Implementing the WCAA, these regulations may apply to any source where any emission unit is required to use RACT. A more detailed description of the general regulations is shown Table A1 of Appendix 1.	Compliance likely
Requirements for New Sources of Toxic Air Pollutants *WAC Chapter 173-460*	Implementing the WCAA, these regulations may apply to any source emitting TAPs, where the source must quantify the increase of each TAP emission, employ T-BACT, and prevent air pollution maintaining an air quality that will protect human health.	Compliance likely

Table 10.2: Relevant Performance Standards Determined Inapplicable

Regulation Title Citation	Relevant Performance Standard Determined Inapplicable	Basis
MACT: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources *40 CFR Part 63, Subpart HHHHHH*	Implementing the FCAA, this standard may apply to any surface coating and stripping operation, where the source must comply with emission standards and work practices for the control of HAP reflecting application of GACT.	*Does not apply because Stabi-Craft does not spray-apply HAPs targeted by the standard (chromium, lead, manganese, nickel, or cadmium).*
MACT: Boat Manufacturing *40 CFR Part 63, Subpart VVVV*	Implementing the FCAA, this standard may apply to new and existing boat manufacturing facilities with resin and gel coat operations, carpet and fabric adhesive operations or aluminum recreational boat surface	*Does not apply because Stabi-Craft is not a major source of HAP.*

	coating that are major sources of HAP, where the source must comply with emission standards and work practices for the control of HAP.	
MACT: Shipbuilding and Ship Repair (Surface Coating) *40 CFR Part 63, Subpart II*	Implementing the FCAA, this standard may apply to shipbuilding and ship repair operations at any facility that is a major source of HAP, where the source must comply with emission standards and work practices for the control of HAP.	*Does not apply because Stabi-Craft is not a major source.*

11. Best Available Control Technology (BACT)

ORCAA Rule 6.1.4(a)(2) and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6, require the finding that a new source or modification to an existing source of air pollution in an attainment or unclassifiable area will employ best available control technology for all pollutants (BACT) not previously emitted or whose emissions would increase as a result of the new source or modification.

New sources of air pollution and modifications to existing sources of air pollution are required to use BACT to control all pollutants not previously emitted, or those for which emissions would increase as a result of the new source or modification. BACT is defined in WAC 173-400-030 as, *"an emission limitation based on the maximum degree of reduction for each air pollutant subject to regulation under chapter 70A.15 RCW emitted from or which results from any new or modified stationary source, which the permitting authority, on a case-by-case basis, taking into account energy, environmental, and economic impacts and other costs, determines is achievable for such source or modification through application of production processes and available methods, systems, and techniques, including fuel cleaning, clean fuels, or treatment or innovative fuel combustion techniques for control of each pollutant."*

Table 11: BACT Determination

EU	Pollutant	BACT Applicable?	BACT Implementation	BACT Limits Met Through
1, 2 Coating	PM, TAP, HAP, VOC	Yes	▪ Reduce PM emissions from coating by at least 98% ▪ Use of low-VOC content materials	▪ Spray coating only in a fully-enclosed spray booth ▪ Spray booth filters with a combined average overspray arrestance rating of at least 98% ▪ HVLP Spray guns and brushes/rollers ▪ Use of low-VOC content materials

12. Ambient Impact Analysis (Criteria Pollutants)

ORCAA's Rule 6.1.4(a)(3) and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6, require emissions from any new stationary source or modification not delay the attainment date of an area not in attainment, nor cause or contribute to a violation of any Ambient Air Quality Standard (AAQS). ORCAA's current Dispersion Modeling Guidance (2009) recommends this approval criteria be demonstrated using dispersion modeling techniques when Potential to Emit (PTE) of any pollutant with an ambient standard is above

ORCAA's adopted significant emission level for the pollutant. Any pollutant with a PTE below its significant emission level can be considered insignificant with respect to maintaining the AAQSs.

Table 12.1: Dispersion Modeling Determination for Criteria Pollutants

Pollutant	Project PTE (TPY)	Modeling Threshold (TPY)	Pass/Fail
PM	0.0166	2.5	Pass
PM10	0.0166	1.5	Pass
PM2.5	0.0166	1.5	Pass
VOC	4.91	N/A	Pass

From ORCAA's Dispersion Modeling Guidance (2009)

Increases of all criteria pollutants from the project are less than the significant emissions thresholds ORCAA uses to identify projects that will likely have de minimis impacts with respect to AAQSs. Therefore, it can be concluded that the project will not delay the attainment date of an area not in attainment, or cause or contribute to a violation of any AAQS for these criteria pollutants.

13. Ambient Impact Analysis (Toxic Air Pollutants)

Washington's regulation titled Controls for New Sources of Toxic Air Pollutants (Air Toxics Rule) under Chapter 173-460 of the Washington Administrative Code applies to new stationary sources of Toxic Air Pollutants (TAP), including modifications to existing emissions units that increase TAP. The purpose of the Air Toxics Rule is to, "... maintain such levels of air quality as will protect human health and safety." The TAPs covered under the Air Toxics Rule include carcinogens and non-carcinogens. TAP emissions increases for determining applicability are the increases attributable to the new or modified emissions unit - Decreases from existing emissions units are not allowed to be subtracted from project-attributable TAP increases when determining applicability. Also, the Air Toxics Rule provides that review of modifications are limited to the emission unit or units proposed to be modified and the TAPs whose emissions would increase as a result of the modification.

The Air Toxics Rule has two independent requirements for new sources and modifications that increase TAP emissions above de-minimis levels:

1) **tBACT:** The new or modified emission units must use Best Available Control Technology to control TAP emissions (WAC 173-460-040(3)(a)).
2) **Ambient Impact:** The NOC application must demonstrate that any increase in TAP from the new or modified emission units are sufficiently low to protect human health and safety from potential carcinogenic and/or other toxic effects (WAC 173-460-070).

tBACT

The tBACT requirement applies to any new or modified emission units that triggers the Air Toxics Rule (results in a TAP increase above de-minimis levels), regardless of facility-wide or

"net" TAP emissions. The term tBACT means Best Available Control Technology, as that term is defined in WAC 173-400-030, but applied to control of TAP (see BACT definition in Section 11).

Table 13.1: tBACT Determination

EU	Pollutant	tBACT Applicable?	BACT Implementation	BACT Limits Met Through
1, 2 Coating	TAP	Yes	▪ Reduce PM emissions from coating by at least 98% ▪ Use of low-VOC content materials	▪ Spray coating only in a fully-enclosed spray booth ▪ Spray booth filters with a combined average overspray arrestance rating of at least 98% ▪ HVLP Spray guns and brushes/rollers ▪ Use of low-VOC content materials

Ambient Impact Review

The Air Toxics Rule provides a multi-tiered, screening approach under WAC 173-460-080 to assess health impacts and demonstrate compliance with the ambient impact requirement under WAC 173-460-070, which is that TAP increases must be sufficiently low to protect human health and safety from potential carcinogenic and/or other toxic effects.

The "First Tier Review" (Tier 1 Review) is a two-step process. First, the emissions increase of each TAP is compared to its unique Small Quantity Emission Rate (SQER). SQERs are listed for each TAP under WAC 173-460-150. An SQER is the level of emissions of a TAP below which dispersion modeling is not required to demonstrate compliance with the ambient impact requirement. TAP emissions increases used in this first step must be based on the maximum potential to emit considering control or reduction in emissions achievable using the air pollution control technology or methods proposed to meet the tBACT requirement. Any TAP with an increase below its SQER can be presumed to be in compliance with the ambient impact requirement. If this is the outcome, further analysis is not required for that TAP. However, TAPs with emissions increases above their SQER must undergo the second step of the Tier 1 Review.

The second step of the Tier 1 Review requires evaluating TAP impacts against Acceptable Source Impact Levels (ASIL) and is referred to as an ASIL Analysis. An ASIL is the adopted health-based concentration for a TAP below which can be presumed as meeting the ambient impact requirement of WAC 173-460-070. ASILs are provided for each TAP under WAC 173-460-150. An ASIL analysis typically involves using an ambient air dispersion model to estimate ambient concentrations resulting from TAP emissions increases and considering air dispersion and local meteorological characteristics of the source. If the modeled impact of the increase in emissions of a TAP does not exceed its corresponding ASIL, the ambient impact requirement of WAC 173-460-070 may be considered met and the First Tier Review is completed for that TAP.

Emissions rates used to support an ASIL Analysis must be based on the maximum potential to emit considering control or reduction in emissions achievable using the air pollution control technology or methods proposed to meet the tBACT requirement. In addition, the Air Toxics Rule allows TAP reductions from existing emission units not subject to review to be subtracted or "netted out" from TAP increases, provided the reductions are included in the approval order as enforceable voluntary emission limits and meet all the requirements of WAC 173-460-071. These requirements include:

(1) The voluntary emissions reductions must be enforceable through a regulatory order issued by the air permitting agency.
(2) The approval order enforcing the voluntary emissions reductions must include monitoring, recordkeeping, and reporting requirements sufficient to ensure the reductions are maintained.
(3) The agency's preliminary determination to approve the voluntary emissions reductions are subject to a 30-day public notice and comment period and opportunity for a public hearing.

For pollutants with ambient concentrations found to be greater than their ASIL, a "Second Tier Review" (Tier 2 Review) by the Washington Department of Ecology (Ecology) is required. An application for a Tier 2 Review by Ecology is referred to a Tier 2 petition. Tier 2 petitions must include a Health Impacts Assessment (HRA) and estimated ambient TAP impacts based on refined air dispersion modeling. Ecology will not act on a Tier 2 petition unless a written preliminary determination on the NOC application for the new or modified TAP source and a draft approval order have been completed by the local agency with jurisdiction. Ecology's review and approval of a Tier 2 petition is contingent on a finding that TAP impacts meet the ambient impact requirement of WAC 173-460-070 that increases in TAP emissions are sufficiently low to protect human health and safety from potential carcinogenic and/or other toxic effects. If Ecology recommends denial of a Tier 2 petition, the permitting authority may not approve the project. The applicant then has the option of submitting a petition for a "Third Tier Review" (Tier 3 Review) by Ecology and a request for a risk management decision.

Table 13.2: First Tier Review of Project Emissions

Pollutant	CAS #	SQER	SQER	SQER	PTE Estimates			SQER Review
					Annual Rate	Daily Rate	Hourly Rate	
		lbs/yr	lbs/24-hr	lbs/hr	(lbs/yr)	(lbs/24-hr)	(lbs/hour)	pass/model
1,2,4 Trimethylbenzene	95636	-	4.4	-	3.46E+01	9.47E-02	3.95E-03	pass
Ethylene glycol monobutyl ether	111159	-	22	-	4.69E+02	1.28E+00	5.35E-02	pass
Benzene	71432	21	-	-	1.88E+01	5.14E-02	2.14E-03	pass
Cumene	92828	-	30	-	3.46E+00	9.47E-03	3.95E-04	pass
Ethylbenzene	100414	65	-	-	2.46E+02	6.75E-01	2.81E-02	model
Ethylene glycol monobutyl ether	111762	-	6.1	-	4.69E+02	1.28E+00	5.35E-02	pass
Hexamethylene Diisocyanate	822060	-	0.0052	-	1.25E+01	3.43E-02	1.43E-03	model
Methyl Ethyl Ketone	78933	-	370	-	1.89E+03	5.17E+00	2.15E-01	pass
Propylene Glycol Monomethyl Ether	107982	-	520	-	2.05E+02	5.62E-01	2.34E-02	pass
Silica (Crystalline Respirable)	7631869	-	0.22	-	2.53E-01	6.94E-04	2.89E-05	pass
Tertiary-butyl	540885	120	-	-	3.06E+01	8.37E-02	3.49E-03	pass

acetate								
Toluene	108883	-	370	-	3.32E+02	9.10E-01	3.79E-02	pass
Xylenes	1330207	-	16	-	1.33E+03	3.63E+00	1.51E-01	pass

Except for Ethylbenzene and Hexamethylene Diisocyanate, all project emissions of TAP were found to be below their respective SQER. The previous tenant CRTC was permitted to emit both pollutants under 18NOC1297. ORCAA staff compared CRTC's previous PTE to Stabi-Craft's proposed PTE.

Table 13.3: Net Increase in Emissions

TAP	CRTC PTE in 18NOC1297	Stabi-Craft's PTE	Net Increase in PTE	Increase above SQER?	SQER Review
Ethylbenzene	3,756 lbs/year	246 lbs/year	*Decrease of 3,510 lbs/year*	No	Pass
Hexamethylene Diisocyanate	1.03 lbs/day	0.0343 lbs/day	*Decrease of 1.00 lbs/day*	No	Pass

WAC 173-460-080 states, "An applicant may show for any TAP that the increase in emissions of that TAP, after application of tBACT, is less than the small quantity emissions rate listed for that TAP in WAC 173-460-160." Table 13.3 demonstrates that even though Stabi-Craft's PTE would exceed the SQERs for ethylbenzene and HDI, the net increase in emissions of both ethylbenzene and HDI are actually decreases and therefore, less than their respective SQER's. The proposed project demonstrates compliance with the requirements of Chapter 173-460 WAC.

14. Requirements for Major Stationary Sources and Major Modifications to Major Stationary Sources

Projects that are major stationary sources and major modifications to major stationary sources as defined in 40 CFR 52.21(b) may be subject to permitting requirements under WAC 173-400-700 through 173-400-860.

Stabi-Craft is not a "Major Stationary Source" as defined in 40 CFR 52.21(b) and not subject to the permitting program required by WAC 173-400-700 through WAC 173-400-860. Therefore, these permitting requirements do not apply.

15. Title V Air Operating Permit (AOP) Implications

The State of Washington program pursuant to Title V of the federal Clean Air Act is governed under Chapter 173-401 WAC, the Washington Air Operating Permit Program. Chapter 173-401 WAC requires existing major stationary sources to operate in compliance with an approved Air Operating Permit (AOP). Major stationary sources are those stationary sources with a potential to emit which is greater than 100 tons per year of any criteria pollutant, greater than 10 tons per year of any hazardous air pollutants (HAP), or greater than 25 tons per year of any combination of HAP.

Stabi-Craft is not a "Major Source" under the Title V program and is not subject to the requirement to operate under an AOP.

16. Conditions of Approval

The following conditions of approval were determined necessary for assuring compliance with applicable air regulations and standards and protecting air quality. Recommended conditions of approval will become effective once the Approval Order is issued:

1. **Approved Equipment.** The marine vessel surface coating operation as described in Notice of Construction application No. 23NOC1586 and the associated Final Determination is approved for construction and operation subject to conditions in this Order of Approval.
   [Regulatory Basis: ORCAA 6.1(a); ORCAA 6.1.2(l); 40 CFR part 52.2470(c), Table 6]

2. **Preapproval Required.** Prior approval by ORCAA may be required for the following as specified in ORCAA Rule 6.1:
   a. Construction, installation, or establishment of any stationary source;
   b. Modification to any existing stationary source;
   c. Replacement or substantial alteration of emission control technology installed on an existing stationary source; or,
   d. Deviations from the approved plans, drawings, data, and specifications of the stationary sources listed in Table 1.

Table 1 Stationary sources located at Stabi-Craft

Emission Unit	Specifications:
Surface Coating Operation Controlled by Spray Booth 1 (In extension outside original building)	**Custom Downdraft Spray Booth** • Spray Booth's exhaust must be directed to a filter to capture paint overspray • Spray Booth dimensions: 16' wide x 12' high x 30' long • 187.5 sq. ft. filter area • 25" x 20" UL Class II paint arrestor filters
Surface Coating Operation Controlled by Spray Booth 2 (West of Spray Booth #1)	Same as Spray Booth 1

[Regulatory Basis: ORCAA 6.1(a); ORCAA 6.1.2(l); WAC 173-400-110(2); WAC 173-400-111(10)]

3. **Material Limits.** The cumulative amount of materials associated with the marine vessel surface coating operation applied during any 12-month consecutive month period must not exceed 1,400 gallons for all materials containing volatile organic compounds (VOCs).
   [Regulatory Basis: ORCAA 6.1.4(a)(1); ORCAA 6.1.2(l); WAC 173-400-113]

4. **Opacity Limit.** The Facility must be operated and maintained such that visible emissions from Facility stacks, vents, exits, and openings from spray coating do not exceed an average of five percent (5%) opacity for any 6 consecutive minutes as determined by EPA Method 9 (Title 40 CFR Part 60, Appendix A Method 9). Visible emissions will trigger prompt (within a week) action to initiate maintenance and/or repair of the associated control device and eliminate opacity. Maintenance and repair actions must be documented and available for inspection.
[Regulatory Basis: ORCAA 6.1.4(a)(2); ORCAA 8.8; WAC 173-400-113(2)]

5. **Coatings Changes Requiring Review.** The use of new TAP-containing materials associated with the marine vessel surface coating operation, other than minor formula changes, requires pre-approval through ORCAA.
[Regulatory Basis: ORCAA 6.1.4(a)(1); WAC 173-460-070]

6. **Filters Requirements.** The approved spray booths must be equipped with properly seated exhaust filters that cover all openings of the exhaust plenum and have a combined efficiency demonstrated to achieve at least 98% capture of paint overspray.
[Regulatory Basis: ORCAA 6.1.4(a)(2); ORCAA 8.8; WAC 173-400-113(2)]

7. **Spray Booth Requirements.** All spray coating operations at the Facility must be confined to the approved spray booths meeting the specifications described in Table 1. The spray booths must be operated and maintained as necessary to keep air pollution control technology in good operating condition.
[Regulatory Basis: ORCAA 6.1.4(a)(2); ORCAA 8.8; WAC 173-400-113(2)]

8. **Stack Requirements.** The exhaust stack of each spray booth must have a vertical discharge to the atmosphere at least six feet above the peak height of the building. There must 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.
[Regulatory Basis: ORCAA 6.1.4(a)(2); WAC 173-400-113]

9. **Operation & Maintenance Requirements:** The following is required:
   a. Except for minor touch up work (pieces 9 square feet or less), all spray coating operations must be conducted in an enclosure comprised of at least three sides and a ceiling that captures and exhausts all overspray through exhaust filters meeting the requirements of this order.
   b. Approved spray booths must be equipped with properly seated exhaust filters that cover all openings of the exhaust plenum and are rated at least 98 percent efficient.
   c. Cleaning spray guns in such a way that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects the used gun cleaning solvent.
   d. Keeping volatile materials in closed containers when not being used.
   e. Operating and maintaining the spray booths consistent with the manufacturer's recommendations.

f. Storing all spray coating operation-related solvents, solvent-containing cloths, or other materials used for surface preparation in closed, airtight containers.
g. Minimizing and promptly cleaning up all volatile material spills and leaks.
h. Monitoring filters each day the booths operate and replacing whenever damaged or loaded with particulate build-up to an extent that jeopardizes the effectiveness of the spray booths in capturing and controlling emissions.

[Regulatory Basis: ORCAA Rule 6.1.4(a)(2); ORCAA Rule 4.3(g); 40 CFR part 52.2470(c), Table 6]

10. **Recordkeeping:** Copies of records must be maintained for a minimum period of five years from the date of origin, and kept on-site and in a printed or electronic form that is readily accessible for inspection for at least the first two years after the date the record is generated and may be kept off-site after that two-year period, provided the records can be made available to ORCAA within 15-days from being requested. At a minimum, records must include the following:
    a. Purchase invoices indicating the amount of VOC and TAP-containing materials used in spray coating operations including the date of purchase and corresponding product identification numbers.
    b. Monthly record of the actual cumulative amount of VOC and TAP-containing materials (used in marine vessel coating operations) used in terms of gallons per month and gallons per previous 12-consecutive months.
    c. Safety Data Sheets (SDS) for all VOC and TAP-containing materials on site associated with surface coating operations.
    d. Records sufficient to verify the average overspray arrestance (filtration) ratings of each exhaust filter material type. Published filter efficiency data provided by filter vendors or laboratories may be used to demonstrate compliance with this requirement.

    [Regulatory Basis: ORCAA 8.11; 40 CFR part 52.2470(c), Table 6]

17. Final Determination to Approve

This Final Determination documents ORCAA staff's determinations with respect to the applicable criteria of approval in ORCAA Rule 6.1 and the Washington State Implementation Plan under 40 CFR part 52.2470(c), Table 6. ORCAA staff recommends approval of Stabi-Craft's proposed marine vessel surface coating operation, provided the conditions identified in Section 16 of this Final Determination are implemented through an enforceable Order of Approval (AKA: Air Permit). Emissions calculations, modeling summary and other data supporting this Final Determination are provided as attachments. ~ *end of section* ~

Mark Goodin for A.M. 4/7/23

PREPARED BY: Aaron Manley, Engineer II Date

Mark Goodin 4/7/23

REVIEWED BY: Mark Goodin, PE Date

1. Generally Applicable Requirements
2. Abbreviations and Acronyms
3. Emissions Calculations

Attachment 1

Generally Applicable Requirements

Applicable Performance Standards that apply to Stabi-Craft

Title Citation	Brief Description (Consult rule/regulation for specific requirements)	Applies to
Registration ORCAA Regulation 4	Requires facilities that are minor sources of emissions to register annually with ORCAA and pay annual registration fees.	Stabi-Craft will continue to be a minor source requiring registration.
Annual Registration Fees ORCAA Rule 3.1	Requires payment of annual registration fees to ORCAA based in part on air pollutants emitted during the previous year.	Stabi-Craft is required to register and pay annual registration fees.
Initial Notification ORCAA Rule 4.3(a)&(b); 4.3(f)	Requires facilities subject to registration to register by submitting an initial notification with the information in ORCAA Rule 4.3(b) within 30 days from: 1) Commencement of operation of any new or recommissioned stationary source; 2) Change in ownership of existing registered stationary source. The notification must be signed by the owner or operator or by the agent appointed by the owner.	
Administrative Change Notification ORCAA Rule 4.3(e); 4.3(f)	Requires facilities to notify ORCAA of any changes to administrative information within 30 days from the change taking place including, but not limited to, contact names, address, phone numbers, and permanent shut down or decommissioning of a stationary source. The notification must be signed by the owner or operator or by the agent appointed by the owner.	
Annual and/or Periodic Reports ORCAA Rule 4.3(c)&(d); 4.3(f)	Requires stationary sources to submit reports with information directly related to the registration program when requested by the Agency within 30 days of receipt of the request. The submittal must be signed by the owner or operator or by the agent appointed by the owner.	
Interference or Obstruction ORCAA Rule 7.1	Prohibits willfully interfering with or obstructing the Executive Director or any Agency employee in performing any lawful duty.	Applies generally to all air pollution sources
False or Misleading Statements ORCAA Rule 7.2	Prohibits any person from willfully making a false or misleading statement to the Board or its	Applies generally to all air pollution sources

Title Citation	Brief Description (Consult rule/regulation for specific requirements)	Applies to
	representative as to any matter within the jurisdiction of the Board.	
Unlawful Reproduction or Alteration of Documents ORCAA Rule 7.3	Prohibits reproducing or altering, or causing to be reproduced or altered, any order, registration certificate or other paper issued by the Agency if the purpose of such reproduction or alteration is to evade or violate any provision of these Regulations or any other law.	Applies generally to all air pollution sources
Display of Orders and Certificates ORCAA Rule 7.4	Any order or registration certificate required to be obtained by these Regulations shall be available on the premises designated on the order or certificate. In the event that the Agency requires order or registration certificate to be displayed, it shall be posted. No person shall mutilate, obstruct, or remove any order or registration certificate unless authorized to do so by the Board or the Executive Director.	The Approval Order issued in conjunction with this NOC approval must be retained on site.
General Requirements WAC 173-400-040(1)(c) ORCAA Rule 8.3	All emissions units are required to use reasonably available control technology (RACT).	Applies generally to all air pollution sources.
Visible Emissions WAC 173-400-040(2) ORCAA Rule 8.2(a)	Prohibits emissions with opacity of greater than 20% for more than three (3) minutes in any one hour.	Applies generally to all air pollution sources
Sulfur Dioxide WAC 173-400-040(7)	No person shall cause or allow the emission from any emissions unit in excess of one thousand ppm of sulfur dioxide on a dry basis, corrected to seven percent oxygen for combustion sources, and based on the average of any period of sixty consecutive minutes.	Applies generally to facilities that emit Sulfur Dioxide.
Control Equipment Maintenance and Repair ORCAA Rule 8.8	ORCAA Rule 8.8 requires that all air contaminant sources keep any process and/or air pollution control equipment in good operating condition and repair.	Applies generally to all air pollution control devices.
Fallout WAC 173-400-040(3) ORCAA Rule 8.3(e)	Prohibits particulate emissions from any source to be deposited, beyond the property under direct control of 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.	Applies generally to all air pollution sources.
Fugitive Emissions WAC 173-400-040(4)(a) ORCAA Rule 8.3(c)	The owner or operator of any emissions unit engaging in materials handling, construction, demolition, or other operation which is a source of fugitive emission shall take reasonable precautions to prevent the release of air contaminants from the operation.	Applies generally to any activity that results in fugitive emissions.

Title Citation	Brief Description (Consult rule/regulation for specific requirements)	Applies to
Odor WAC 173-400-040(5) ORCAA Rule 8.5	ORCAA Rule 8.5 contains general requirements for controlling odors and a general prohibition of odors that unreasonably interfere with the use or enjoyment of a person's property.	Applies generally to all air pollution sources.
Emissions Detrimental to Persons or Property WAC 173-400-040(6) ORCAA Rule 7.6	Prohibits causing or allowing the emission of any air contaminant from any source if it is detrimental to the health, safety, or welfare of any person, or causes damage to property or business.	Applies generally to all air pollution sources
Concealment and Masking WAC 173-400-040(8) ORCAA Rule 7.5	Prohibits installation or use of any device or means to conceal or mask emissions of an air contaminant, which causes detriment to health, safety, or welfare of any person, or causes damage to property or business.	Applies generally to all air pollution sources
Fugitive Dust WAC 173-400-040(9)	The owner or operator of a source or activity that generates fugitive dust must take reasonable precautions to prevent that fugitive dust from becoming airborne and must maintain and operate the source to minimize emissions.	Applies to any activity that results in fugitive dust.
Excess Emissions Provisions WAC 173-400-107; WAC 173-400-108 ORCAA 8.7	Requires excess emissions be reported to the Agency as soon as possible and within 24 hours and establishes criteria qualifying excess emissions as unavoidable.	Applies generally to all air pollution sources
Record Keeping and Reporting. ORCAA Rule 8.11	Requires the following: 1. Maintenance of records on the nature and amounts of emissions and other related information as deemed necessary by ORCAA; 2. Reporting of emissions to ORCAA upon request.	Required of all facilities registered with ORCAA.
Particulate Standards for Process units ORCAA Rule 8.3(a) WAC 173-400-060	Prohibits emissions from any process unit in excess of 0.1 grain/dscf. EPA test methods from 40 CFR Appendix A shall be used should demonstration of compliance be required.	Applies to generally to all stationary process units that exhaust to the atmosphere.
Particulate Standards for Combustion Units ORCAA Rule 8.3(a) WAC 173-400-050(1)	Prohibits emissions from any combustion unit in excess of 0.1 grain/dscf. EPA test methods from 40 CFR Part 60 Appendix A shall be used should demonstration of compliance be required.	Applies generally to all stationary combustion units that exhaust to the atmosphere.

Attachment 2

Abbreviations and Acronyms

Abbreviations and Acronyms

AOP	Air Operating Permit
AP-42	Compilation of Emission Factors, AP-42, Fifth Edition, Volume I, Stationary Point and Area Sources – Published by EPA
ASIL	Acceptable Source Impact Level pursuant to Chapter 173-460 WAC
BACT	Best Available Control Technology
CAM	Compliance assurance monitoring (40 CFR 64)
CFR	Code of Federal Regulations
CO	Carbon monoxide
EPA	United States Environmental Protection Agency
FCAA	Federal Clean Air Act
HAP	Hazardous air pollutant listed pursuant to Section 112 FCAA
MACT	Maximum Achievable Control Technology
NAAQS	National Ambient Air Quality Standard
NESHAPs	National Emission Standards for Hazardous Air Pollutants
NOC	Notice of Construction application
NO_X	Nitrogen oxides
NSPS	New Source Performance Standards
NSR	New Source Review
ORCAA	Olympic Region Clean Air Agency
PM	Total particulate matter (filterable + condensable particulate matter)
PM_{10}	Particulate matter with an aerodynamic diameter less than or equal to 10 micrometers (filterable + condensable particulate matter)
$PM_{2.5}$	Particulate matter with an aerodynamic diameter less than or equal to 2.5 micrometers (filterable + condensable particulate)
PSD	Prevention of Significant Deterioration
RACT	Reasonably Available Control Technology
RBLC	RACT/BACT/LEAR Clearinghouse
RCW	Revised Code of Washington
SO_2	Sulfur Dioxide
SQER	Small Quantity Emission Rate listed in Chapter 173-460 WAC
TAP	Toxic Air Pollutant pursuant to Chapter 173-460 WAC
T-BACT	Best Available Control Technology for toxic air pollutants
VOC	Volatile Organic Compound
WAC	Washington Administrative Code

Units of Measurement

′	minute (measurement of angle)
″	second (measurement of angle)
°	degree
acfm	actual cubic feet per minute
atm	atmosphere
Bhp	Brake horse power
Btu	British thermal units
cfm	cubic feet per minute
dscfm	dry standard cubic feet per minute
°F	degree Fahrenheit
ft	feet
g	grams
g/s	grams per second
gal	gallon
gr	grain
hp	horsepower
hr	hour
in	inches
K	degree Kelvin
kg	kilograms
km	kilometers
kW	kilowatt
L	liter
lb	pounds
m	meters
M	thousand
Mbf	thousand board feet
min	minute
MM	million
MMbf	million board feet
MMBtu	million British thermal units
ug	micrograms
ppb	parts per billion
ppm	parts per million
ppmvd	parts per million, dry volume
psi	pounds per square inch
s	second
scfm	standard cubic feet per minute
tpy	tons per year

Attachments

Transfer Efficiency	65%
Booth Filter Efficiency	98.0%
Schedule days/yr	365
Schedule hrs/yr	8760
Schedule wks/yr	52
Cumulative Material Limit (gal/yr)	1400

From Permit Application
ASSUMED
CALCULATED
CONSTANT

Index	Product Name	**Estimated Material Usage** (gal/yr)	**Prorated Usage** (gal/yr)	Product Specific Gravity	**Density** (lbs/gallon)	**Potential** (lbs/yr)	VOC (lbs/gal)	Max %VOC (by wt)	Max %Solid (by wt)	**Uncontrolled PTE VOC** (tons/yr)	**Uncontrolled PTE PM** (tons/yr)	**Controlled PTE PM** (tons/yr)
1	Awlprep plus - OT0115	150	277.59	0.81	6.76	1875.26	6.76	100%	0%	0.94	0.00	0.000
2	Bonderite Wipe - 0770020	12.5	23.13	0.70	5.81	134.47	1.70	29%	71%	0.02	0.05	0.001
3	RPHull Primer Base - 078001	68	125.84	1.72	14.37	1808.36	0.00	21%	79%	0.19	0.72	0.014
4	RP Hull Primer Converter - 078002	23	42.56	0.97	8.12	345.62	5.10	63%	37%	0.11	0.06	0.001
5	Alpha Stabi Green Base - L4059	132	244.28	1.01	8.42	2057.69	0.00	100%	0%	1.03	0.00	0.000
6	AWLcraft 2000 Clear - OF3029	138	255.39	0.99	8.26	2108.63	0.00	100%	0%	1.05	0.00	0.000
7	AWLCat#2 Spray Converter - OG3010	82	151.75	0.99	8.26	1252.95	0.00	100%	0%	0.63	0.00	0.000
8	Reducer Fast Spray - OT0002	151	279.44	0.81	6.76	1887.76	0.00	100%	0%	0.94	0.00	0.000
TOTAL	-	**756.50**	**1400**		-	**11470.74**	-	-	-	**4.91**	**0.83**	**1.66E-02**

Attachments

Example Calculation: 1,2,4 Trimethylbenzene (TMB) daily emissions:

Per RP Hull Primer Converter - 078002 SDS: TMB content up to 10% by weight.

RP Hull Primer Converter - 078002: $\frac{42.56\ \text{gal}}{\text{Yr}} \times \frac{8.12\ \text{lb paint}}{\text{gal}} \times \frac{10\ \text{lb TMB}}{100\ \text{lb paint}} \times \frac{1\ \text{year}}{365\ \text{days}}$ = **0.0947 lbs TMB/day**

Coating Calculations

Product Index	Product Maximum Usage	Pollutant from Spray Coating	CAS #	Max Concentration	Boiling Point	HAP?	TAP?	VOC or PM	PTE Estimates		
									Annual Rate	Daily Rate	Hourly Rate
	(lbs/yr)			% wt	Deg C				(lbs/yr)	(lbs/24-hr)	(lb/hr)
4	345.62	1,2,4 Trimethylbenzene	95636	0.10	170	No	Yes	VOC	3.46E+01	9.47E-02	3.95E-03
TOTAL		**1,2,4 Trimethylbenzene**	**95636**	-	**170**	**No**	**Yes**	**VOC**	**3.46E+01**	**9.47E-02**	**3.95E-03**
1	1875.26	Benzene	71432	0.01	80.1	Yes	Yes	VOC	1.88E+01	5.14E-02	2.14E-03
TOTAL		**Benzene**	**71432**	-	**80.1**	**Yes**	**Yes**	**VOC**	**1.88E+01**	**5.14E-02**	**2.14E-03**
4	345.62	Cumene	98828	0.01	152	Yes	Yes	VOC	3.46E+00	9.47E-03	3.95E-04
TOTAL		**Cumene**	**98828**	-	**152**	**Yes**	**Yes**	**VOC**	**3.46E+00**	**9.47E-03**	**3.95E-04**
6	2108.63	Ethylbenzene	100414	0.10	136	Yes	Yes	VOC	2.11E+02	5.78E-01	2.41E-02
4	345.62	Ethylbenzene	100414	0.05	136	Yes	Yes	VOC	1.73E+01	4.73E-02	1.97E-03
3	1808.36	Ethylbenzene	100414	0.01	136	Yes	Yes	VOC	1.81E+01	4.95E-02	2.06E-03
TOTAL		**Ethylbenzene**	**100414**	-	**136**	**Yes**	**Yes**	**VOC**	**2.46E+02**	**6.75E-01**	**2.81E-02**
1	1875.26	Ethylene glycol monobutyl ether	111762	0.25	121	No	Yes	VOC	4.69E+02	1.28E+00	5.35E-02
TOTAL		**Ethylene glycol monobutyl ether**	**111762**	-	**121**	**No**	**Yes**	**VOC**	**4.69E+02**	**1.28E+00**	**5.35E-02**
7	1252.95	Hexamethylene Diisocyanate	822060	0.01	135	Yes	Yes	VOC	1.25E+01	3.43E-02	1.43E-03
TOTAL		**Hexamethylene Diisocyanate**	**822060**	-	**135**	**Yes**	**Yes**	**VOC**	**1.25E+01**	**3.43E-02**	**1.43E-03**
8	1887.76	Methyl Ethyl Ketone	78933	1.00	79.6	Yes	Yes	VOC	1.89E+03	5.17E+00	2.15E-01

Attachments

TOTAL		**Methyl Ethyl Ketone**	**78933**	**-**	**79.6**	**Yes**	**Yes**	**VOC**	**1.89E+03**	**5.17E+00**	**2.15E-01**
5	244.28	Propylene Glycol Monomethyl Ether	107982	0.10	119	No	Yes	VOC	2.44E+01	6.69E-02	2.79E-03
3	1808.36	Propylene Glycol Monomethyl Ether	107982	0.10	119	No	Yes	VOC	1.81E+02	4.95E-01	2.06E-02
TOTAL		**Propylene Glycol Monomethyl Ether**	**107982**	**-**	**119**	**No**	**Yes**	**VOC**	**2.05E+02**	**5.62E-01**	**2.34E-02**
3	1808.36	Silica (Crystalline Respirable)	7631869	0.02	-	No	Yes	PM	2.53E-01	6.94E-04	2.89E-05
TOTAL		**Silica (Crystalline Respirable)**	**7631869**	**-**	**-**	**No**	**Yes**	**PM**	**2.53E-01**	**6.94E-04**	**2.89E-05**
3	1808.36	Tertiary-butyl acetate	540885	0.10	145	No	Yes	VOC	3.06E+01	8.37E-02	3.49E-03
TOTAL		**Tertiary-butyl acetate**	**540885**	**-**	**145**	**No**	**Yes**	**VOC**	**3.06E+01**	**8.37E-02**	**3.49E-03**
1	1875.26	Toluene	108883	0.01	110.6	Yes	Yes	VOC	1.88E+01	5.14E-02	2.14E-03
7	1252.95	Toluene	108883	0.25	110.6	Yes	Yes	VOC	3.13E+02	8.58E-01	3.58E-02
TOTAL		**Toluene**	**108883**	**-**	**110.6**	**Yes**	**Yes**	**VOC**	**3.32E+02**	**9.10E-01**	**3.79E-02**
1	1875.26	Xylenes	1330207	0.50	140	Yes	Yes	VOC	9.38E+02	2.57E+00	1.07E-01
5	244.28	Xylenes	1330207	0.00	140	Yes	Yes	VOC	0.00E+00	0.00E+00	0.00E+00
7	1252.95	Xylenes	1330207	0.10	140	Yes	Yes	VOC	1.25E+02	3.43E-01	1.43E-02
6	2108.63	Xylenes	1330207	0.10	140	Yes	Yes	VOC	2.11E+02	5.78E-01	2.41E-02
4	345.62	Xylenes	1330207	0.15	140	Yes	Yes	VOC	5.18E+01	1.42E-01	5.92E-03
TOTAL		**Xylenes**	**1330207**	**-**	**140**	**Yes**	**Yes**	**VOC**	**1.33E+03**	**3.63E+00**	**1.51E-01**

OLYMPIC REGION CLEAN AIR AGENCY

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

FORM 1- NOTICE OF CONSTRUCTION

TO CONSTRUCT - INSTALL - ESTABLISH OR MODIFY AN AIR CONTAMINANT SOURCE

Form 1 Instructions:

1. Please complete all the fields below. **This NOC application is considered incomplete until signed.**
2. If the application contains any confidential business information, please complete a Request of Confidentiality of Records (www.orcaa.org/forms).
3. Duty to Correction Application: An applicant has the duty to supplement or correct an application. Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application must, upon becoming aware of such failure or incorrect submittal, promptly submit supplementary factors or corrected information.

Business Name: Stabi-Craft Marine USA, Inc	**For ORCAA use only**
Mailing Address: 2007 S 'O' Street, Port Angeles, WA 98363	File No: 675 County No: 9 Source No: 9 Application No: 23NOC1586
Physical Address of Project or New Source: 2140 W. 18th Street, Port Angeles, WA 98363	Date Received: Received FEB 16 2023 ORCAA
Billing Address: Brook.mcpherson@stabicraft.com	

Project or Equipment to be installed/established:

No additional equipment is to be modified or installed. The two paint booths in question are already in place and were operational under previous ORCAA applications 11MOD812 and 18NOC1297.

Anticipated startup date: 3 / 15 / 2023 Is facility currently registered with ORCAA? Yes ☐ No ☒

This project must meet the requirements of the State Environmental Policy Act (SEPA) before ORCAA can issue final approval. Indicate the SEPA compliance option:

- ☐ SEPA was satisfied by _____ (government agency) on ___/___/___ (date) - Include a copy of the SEPA determination
- ☐ SEPA threshold determination by _____ (government agency) is pending - Include a copy of the environmental checklist
- ☐ ORCAA is the only government agency requiring a permit - Include ORCAA Environmental Checklist
- ☒ This project is exempt from SEPA per 197-11-800(3) (WAC citation).

Name of Owner of Business:		Agency Use Only
Title:		
Email:	Phone:	CONDITIONALLY APPROVED FOR CONSTRUCTION ONLY IN ACCORDANCE WITH RCW 70A.15, WAC 173-400 ORCAA REGULATIONS (SEE ATTACHED ADDENDUM FOR CONDITIONS OF APPROVAL)
Authorized Representative for Application (if different than owner): David Rarm		
Title: Sales & Marketing Manager		
Email: david.rarm@stabicraft.com	Phone:360-808-0280	
I hereby certify that the information contained in this application is, to the best of my knowledge, complete and correct.		4/7/2023
Signature of Owner or Authorized Representative: (sign in Blue Ink)		DATE
C. Rarm	**Date:** 14 Feb 2023	ORCAA
IMPORTANT: Do not send via email or other electronic means. ORCAA must receive Original, hardcopy, signed application and payment prior to processing application.		