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Technical Support Document

For Air Operating Permit # 14AOP1029

Westport, LLC

AOP - Renewal
14AOP1029
March 1, 2021

Technical Support Document for Westport LLC

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PERMIT NO:	14AOP1029
ISSUANCE DATE:	March 1, 2021
EXPIRATION DATE:	March 1, 2026
PERMITTEE & MAILING ADDRESS:	Westport LLC PO Box 308 Westport, WA 98595
FACILITY LOCATION:	1807 N. Nyhus Westport, WA 98595
FACILITY DESCRIPTION:	Fiberglass Yacht Manufacturer
ORCAA FILE #:	474
PRIMARY SIC:	3732
NAICS:	336612
ICISAir:	WAORC0005302700701

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1.0 Disclaimer

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

2.0 Process Descriptions

2.1 Overview

Westport LLC is located on Nyhus Street near the Westport Marina in Westport, Washington. The Westport LLC facility currently manufactures yachts using fiberglass reinforced plastics. Additionally, the facility has manufactured military ships in past years. However, Westport does not conduct any repair/repainting of ships because they have no way to pull boats out of the water.

Westport LLC was in existence as a marine vessel manufacturing facility (primarily commercial fishing boats and passenger ferries) at this location prior to 1990 and has been registered as an air pollutant source with ORCAA since 1990. Since registering with ORCAA, the facility has been operating as a luxury yacht manufacturing facility (with the exception of constructing one military marine vessel in 2009). In 1995, Westport LLC 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 LLC conducted a facility source test that showed that styrene emissions had been previously underestimated. This, in addition to expected sales growth, caused Westport LLC to request approval to exceed their 10 TPY styrene emission limit. Westport LLC 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 Boat Building Process

Westport is a major source of styrene, which is largely emitted during the various fiberglass layup processes throughout the facility. Prior to making a fiberglass reinforced part, a mold must be built. The first step in making a mold is to make a plug. Plugs are a representation or “mock-up” of what the finished product will be and can be made from a variety of materials, such as core foam material mounted to plywood. The surface of the plug is sanded and filled until the desired results are achieved (if the surface of the plug is not smooth, the surface of the mold will not be smooth, and those imperfections will show in the final part). Once the desired shape and surface smoothness is attained for the plug, a mold release is applied so that the mold will detach from the plug more easily. The mold is made by first spraying gelcoat over the plug to provide the smooth outer surface of the mold. Next, the first layer of resin-saturated fiberglass is put down. Successive layers of resin-saturated fiberglass are applied until the desired thickness is reached for the mold; core materials may be used between layers of fiberglass, depending on the size/shape of the mold. Once cured, the mold is removed from the

plug, and any imperfections are corrected to achieve a smooth surface.

The parts that will ultimately become a boat are built in the mold. Gelcoat is applied to the mold using conventional spray application techniques to form the smooth outside surface of the part that is being fabricated. After the gelcoat is applied, the composite structure is fabricated by applying successive layers of polyester resin saturated fiberglass into the mold, which then cures to yield a rigid, fiberglass reinforced plastic part. The fiberglass provides the strength, while the resin provides the stiffness. The resin can be applied to the fiberglass using several different techniques. Westport uses four different methods to apply resin: hand application (e.g., rollers), flow coaters, vacuum infusion, and an impregnator. In vacuum infusion, the dry (no resin applied yet) fiberglass (and core material if desired) layers are assembled and sealed inside of a vacuum bag, which is connected to a network of tubes transporting resin to the bagged fiberglass. Under vacuum, the resin is evenly drawn throughout the bagged structure. The infusion process produces less styrene emissions compared to conventional wet layup techniques. 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 which allows the material to become saturated or "impregnated" with the resin as it is pulled through the reservoir. The resin-saturated fiberglass is then gently lowered onto the gel-coated inside of the mold and immediately followed with surface rollers to mechanically force air bubbles out of the composite. Successive layers of fiberglass are applied, until the desired thickness is achieved. For certain parts, a core material may be placed in between successive layers of fiberglass to reduce weight without compromising strength and durability of the final product.

Once all the parts of the yacht are created, they are assembled; this includes large pieces such as the hulls and decks, and small interior items such as cabinets and kitchen countertops. While fiberglass layup is a large part of Westport's operations, Westport also has metal working, carpentry, and cabinet shops on-site that manufactures other yacht parts including railings, stair wells, hatches, kitchen countertops, and even hot tubs. A majority of the wood-working items come from Westport's cabinet shop in Port Angeles and is regulated as a separate source of air emissions.

2.3 Building Operations Overview

Location:

Building #1	Powder coating
Building #2	Small parts lamination & cutting/sanding/coating of small parts
Building #3	Storage
Building #4	Lamination, mold manufacturing & storage
Building #5	Paint booth
Building #7 Assembly	Large parts assembly & finishing; secondary lamination
Building #7 Annex	Metal working, carpentry shop, bay seven (formerly referred to as the fiberglass house assembly shop), & cabinet shop
Building #8	Storage
Building #9	Large parts lamination & plug fabrication

Building #1
The powder coating in Building #1 was modified in 2012 or 2013 from using nitric acid rinse tanks for etching to applying sulfuric acid, phosphoric acid and hydrofluoric acid by non-atomized hand spray. The powder coating process has three steps: metal etching followed by application of the powder coating in a three-sided spray booth that exhausts internally, then curing in one of two propane-fired ovens (0.75 and 0.5 MMBtu/hr). Wastewater from the new etching process is neutralized with sodium hydroxide and processed in a Samsco Water Evaporator.

Emissions from the powder coating and curing operations are below the PQL. Therefore, they are considered an insignificant emission unit per WAC 173-401-530(4).

Building #2
Building #2 contains the small parts manufacturing processes (i.e., parts that are smaller than the main components of the yachts such as hulls, decks, and bridges). "Small parts" manufactured in Building #2 can range from something as large as a car to something as small as a shoebox. All the small parts manufactured in Building #2 are made using fiberglass lamination construction techniques including spray or hand application and infusion. The building's ventilation system is equipped with three filtered exhaust units that each have a flowrate of 10,000 ACFM. Building #2 also contains four booths (two for painting and two prep booths for cutting/sanding).

Building #3
Building #3 contained a waterwall paint booth that has since been removed as noted in the 14AOP1029 renewal application. Building #3 is currently used for general storage.

Building #4
In 2007, Westport submitted a NOC application (07NOC554) seeking approval of a 70-foot by 154-foot expansion to Building 4 for use as a small parts production area using the same processes described for Building #2; spray or hand application techniques as well as infusion processes are used to apply the resin. Building #4 is equipped with a new ventilation system that is identical to the units installed in Building #9. Particulate matter emissions result from cutting core material and from spray application of resins and gelcoats. The system exhausts though a 36-foot vertical stack. The area is also used for mold storage.

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. In March 2019, the booth was extended to 50-feet by 160-feet, and air handling equipment changes were made. High transfer efficiency coating techniques are used, and the spray booth air is filtered prior to exhaust to remove particulate. There are two 55-foot stacks (as measured from ground level) with an air flowrate of 30,000 dscfm each. Additionally, there are (2) 60,000 cfm vertical air make-up units to provide a slight positive pressure within the paint booth.

Building #7 Assembly Area
Building #7 is used to assemble the yachts. Assembly operations involve piecing together the major yacht components (hull, decks, bridges) that have been fabricated elsewhere at the facility. Only hand lay-up techniques are used to assemble the parts when secondary lamination is necessary. Sanders/grinders are equipped with vacuums when practicable, and the doors are kept closed during sanding/grinding operations. 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. The Building #7 Assembly Area is not equipped with an exhaust/ventilation system.

Building #7 Annex
The Building #7 Annex contains the metal working area (fabrication shop), the carpentry shop, bay seven (formerly referred to as the fiberglass house assembly shop), and the cabinet shop.

Besides the cabinet shop, all other activities in the annex were originally reviewed under 04NOC351. Welding and metal polishing are done in the fabrication shop. The welding process uses less than 20 pounds of welding wire per day and uses inert gas to shield the weld from oxygen. Welding emissions are controlled with a 9,500 ACFM baghouse that vents to the exterior of Building 7. However, the NOC approving the welding baghouse, including the subsequent replacement, states the exhaust vents into the interior of Building 7. ORCAA staff investigated this discrepancy and determined the exhaust was altered at an unknown time to vent outside. Although, this change does not trigger New Source Review because the NOCs for the welding baghouse and the subsequent replacement conservatively evaluated potential emissions by reviewing emissions as if everything would be vented to the atmosphere. Therefore, there is no increase in potential emissions beyond what was originally reviewed and approved. The carpentry shop is used to fit, and repair wood cabinets as needed; no paints, varnishes, or other VOC-containing materials are used in the carpentry shop. Particulate emissions are controlled with a 7,000 ACFM baghouse. Bay Seven, formerly referred to as the Fiberglass House Assembly Shop, is used for small parts sanding and fairing, which includes priming. Small parts would include those that are roughly less than 700 square feet each, such as a yacht hard top, hatch covers, etc. The NOC originally approving operations in Bay Seven did not review emissions associated with fiberglass layup and coating; the review only extended to sanding exterior surfaces and applying putty. However, in 2020, ORCAA staff became aware of this inconsistency and requested usage information related to the lamination and coating done in Bay Seven. Based on the information provided by Westport, maximum production in this area equates to producing six hard tops per year. ORCAA staff determined the emissions associated with lamination and coating in Bay Seven for six hard tops a year is de-minimis with respect to New Source Review. Emissions from this area are controlled by a filter bank, located in the southwest corner of the building.

The cabinet shop was originally reviewed under 06NOC462. This area is used to conduct touch up work to the cabinets. Relevant equipment consists of an epoxy room, several sanding stations, a paint booth, and a drying room. The epoxy room roof vents are equipped with

pleated filters, and the paint booth has a filter bank.

Building #8
This building is used for general storage. EU16 provides heat to the building.

Building #9
Building #9 is a 145-foot by 269-foot structure that houses the large parts (e.g., hulls, decks, bridges) manufacturing processes, including plug, mold, and large parts fabrication.

The exhaust/ventilation system in Building 9 is comprised of four separate independent systems that are each rated at 10,000 ACFM. The four systems are identical and are each located in separate corners of the building. They are designed to accommodate flexible ducting that can be extended into the interior of the yachts in order to capture emissions and ventilate the portion of the boat where work is being done.

2.4 Space Heating & Emergency Engines

Westport operates 22 small boilers and heaters for space heating. All heating units, except for the two 2.5 MMBtu/hr boilers associated with Buildings #7 and #8, are considered insignificant emission units per WAC 173-401-533(2)(e). There are three emergency diesel generators located on-site.

3.0 Emission Unit Summary

Table 3.1 Emission Unit Summary

EU#	Building	Name/Description	Associated NOC	Controls
EU1	Building 9	Large parts lamination and plug fabrication	07NOC554	Ventilation stack system with filters
EU2	Building 2	Small parts lamination, infusion molding, mixing booth	08NOC630	Ventilation stack system with filters
EU3	Building 2	Cutting, sanding, and coating of small parts	08NOC598	4 booths: • 2 Spray booths (Booth 1 and 2) • 2 Prep Booths (Prep Booth 1 and 2)
EU4	Building 4	Small parts lamination (primarily on north end, south is storage)	07NOC554	Ventilation stack system with filters
EU5	Building 5	Spray booth	NOC 657	Ventilation stack system with filters
EU6	Building 7 Assembly Area	Large parts assembly and finishing resulting in minor pollutant emissions rates. Includes some sanding and secondary lamination (hand lay-up techniques only) and surface coating.	No EU-specific NOC (grandfathered[1])	Sanders/grinders with vacuums when practicable, and keeping doors closed during sanding/grinding operations.
EU7	Building 7 Annex – Bay Seven	Bay Seven: formerly referred to as the Fiberglass House Assembly Shop (W side of 1st floor): sanding exterior surfaces, application of putty called Awlfair. Surface coating and lamination with de-minimis emissions.	04NOC351	Ventilation stack system with filters at 15" above ground level at the SW corner of building.

[1] Stationary sources registered as "Grandfathered" were installed or constructed prior to the NSR effective date for their specific class of equipment and have not been modified since this date. Stationary sources that are "Grandfathered" are subject to general applicable requirements but are not subject to any requirements under a Notice of Construction (NOC) Approval Order.

EU8	Building 7 Annex – Metal Working	Welding/metal polishing (East side of 1st floor) Also called fabrication shop. Assumes no more than 20 lbs. of welding rod per day. (Page 1 of 04NOC351 Final Determination).	04NOC351 08NOC638	**Welding** – 9,500 ACFM Micro Air RP6 baghouse type fabric filter unit- vents to the exterior of Building 7. Pressure drop measured with electronic magnehelic gauge. Filter catch is collected in a 55-gallon steel drum connected to the bottom of the baghouse.
EU9	Building 7 Annex – Carpentry Shop	Carpentry Shop (center of 1st & 2nd floors): No paints, vanishes, VOCs. Used for fitting, repairing, etc., wood cabinets. Has a CNC.	04NOC351 08NOC620	**Carpentry** – 7,000 ACFM Donaldson Torit pulse-jet modular baghouse. Exhausts to atmosphere.
EU10	Building 7 Annex – Cabinet Shop	Wood cabinets components finishing area, referred to as **Building 7 cabinet shop.** Used to do touch-up work to cabinets. Consists of **epoxy room** (non-spray), several **sanding stations**, a **paint booth** (30'x20'/5000 acfm/30 ft exhaust stack/filter bank), and a **drying room** (14'6"x22'/5000 acfm/1.2 MMBtu/hr heater).	06NOC462	**Epoxy Room** – Two roof vents with pleated filters. **Sanding Stations** – None. **Paint Booth** – Fan/Filter bank/Stack **Drying Room** – None.
EU11	Building 9	Emergency Engine Rated Horsepower: 717 HP Make/Model: Caterpillar C15 S/N: G6B02090 Manufacture Date: Feb. 27, 2006	07NOC554	None.
EU12	Building 7	Emergency Engine Rate Horsepower: 643 HP	N/A –	None.

		Make/Model: Detroit/unknown S/N: Unknown Manufacture Date: Unknown	grandfathered[1]	
EU13	Building 5 (adjacent to Building 2 and Building 5)	Emergency Engine Rate Horsepower: 330 HP Make/Model: Detroit/unknown S/N: Unknown Manufacture Date: Unknown	N/A	None.
EU14	Building 1	Metal etching/evaporator	13NOC978	None.
EU15	Building 7 & 8	2.5 MMBtu/hr propane boiler Model: CR2-G-15 S/N:071660997	N/A	None.
EU16	Building 7 & 8	2.5 MMBtu/hr propane boiler Model: CR2-G-20B S/N:071661016	N/A	None.

Note 1: 09MOD701 applies facility-wide and includes a facility-wide VOC emission limit with associated monitoring and recordkeeping.

Table 3.2 Insignificant Emission Units

IEU #	Building	IEU Name	Size/Capacity	Basis for IEU Designation
IEU1	Building 1	Powder Coating with filter/exhaust system that exhausts into the building	N/A	WAC 173-401-530(4)
IEU2	Building 1	Propane Adams Burner (used by evaporator)	100,000 Btu/hr	WAC 173-401-533(2)(e)
IEU3	Building 1	Propane Space heater	310,000 Btu/hr	WAC 173-401-533(2)(r) (see Table 5.3.1)
IEU4	Building 1	Powder Coating Ovens (2 units)	0.73 MMBtu	WAC 173-401-530(4)

[1] Stationary sources registered as "Grandfathered" were installed or constructed prior to the NSR effective date for their specific class of equipment and have not been modified since this date. Stationary sources that are "Grandfathered" are subject to general applicable requirements but are not subject to any requirements under a Notice of Construction (NOC) Approval Order

			0.5 MMBtu	(see Table 5.3.1)
IEU5	Building 2	3-sided grinding booth that vents inside	N/A	WAC 173-401-530(4)
IEU6	Building 2	Propane Boiler (4 identical units)	310,000 Btu/hr	WAC 173-401-533(2)(e) (see Table 5.3.1)
IEU7	Building 3	Propane space heater	97,000 Btu/hr	WAC 173-401-533(2)(r) (see Table 5.3.1)
IEU8	Building 4	Propane boiler (2 units)	310,000 Btu/hr	WAC 173-401-533(2)(e) (see Table 5.3.1)
IEU9	Building 4	Propane space heater	250,000 Btu/hr	WAC 173-401-533(2)(r) (see Table 5.3.1)
IEU10	Building 5	Propane space heaters for booth (2 units)	1.25 MMBtu/hr	WAC 173-401-533(2)(r) (see Table 5.3.1)
IEU11	Building 5	Diesel storage for generator	55 gallons	WAC 173-401-533(2)(c)
IEU12	Building 7	Machine Shop	N/A	WAC 173-401-530(4)
IEU13	Building 7	Propane Storage	30,000 gallons	WAC 173-401-533(2)(d)
IEU14	Building 7	Diesel storage for generator	4,000 gallons	WAC 173-401-533(2)(c)
IEU15	Building 7 Annex – Metal Working	Machine Shop (IEU) (center of 1st floor) used for constructing hydraulic components, fabricating manifolds, pumps, etc. minimal emissions.	N/A	WAC 173-401-530(4)
IEU16	Building 9	Propane Boilers (9 units)	310,000 Btu/hr	WAC 173-401-533(2)(e) (see Table 5.3.1)
IEU17	Building 9	Acetone Still	30 gallons	WAC 173-401-

				533(2)(o)
IEU18	N/A	Roll-applying corrosion control coating to I-beam trailers	Less than 40 gallons/year	WAC 173-401-530(4)

4.0 Actual Emissions 2019

Table 4.1 2019 Actual Emissions[1]

Pollutant	2019 Emissions (tons)	Estimate Basis
Volatile Organic Compounds (VOC)	10.4	See below
Total HAPs[2]	5.1	
Total TAPs[3]	6.3	
Ethyl acetate (CAS# 141-78-6)	0.18	Material balance
Isopropanol (CAS# 67-63-0)	0.83	Material balance
Methanol* (CAS# 67-56-1)	0.29	Material balance
Methyl Ethyl Ketone (CAS# 78-93-3)	0.34	Material balance
Methyl Isobutyl Ketone* (CAS# 108-10-1)	0.33	Material balance
Methyl Methacrylate* (CAS# 80-62-6)	0.28	NMMA/ACMA[5,6] emission factors and material balance
Styrene* (CAS# 100-42-5)	2.60	
Toluene* (CAS# 108-88-3)	1.20	Material balance
Xylene* (CAS# 1330-20-7)	0.22	Material balance
Other TAPs[4]	0.23	Material balance

[1]Annual emissions will vary from year to year based on operational conditions at the facility. Data presented above were summarized from the 2019 Annual Emission Inventory submitted to ORCAA in early 2020.

[2]HAP designates a hazardous air pollutant pursuant to Section 112 of the Federal Clean Air Act. HAPs are marked with an *.

[3]TAP designates a toxic air pollutant pursuant to Chapter 173-460 of the Washington Administrative Code.

[4]Other toxic air pollutants emitted at less than 0.1 TPY: 1-Methoxy-2-Propanol, Cumene, Cyclohexane, Ethylbenzene, Ethylene Glycol, 1,6-Hexamethylene diisocyanate, Methylene diphenyl isocyanate, Phosphoric Acid, Sulfuric Acid

[5]NMMA stands for National Marine Manufacturers Association

[6]ACMA stands for American Composites Manufacturers Association

5.0 Regulatory Determinations

5.1 Applicability of Title V of the Federal Clean Air Act

Applicable
The Westport LLC facility in Westport, WA is a major source of styrene and, therefore, subject to Title V of the Federal Clean Air Act. Westport has always operated under either a permit application shield or under a permit while it was subject to Title V permit requirements.

In addition to the facility in Westport, Westport LLC also owns two manufacturing facilities in Port Angeles (Westport LLC – 50 Meter and Westport LLC – Interior). The 50 Meter facility is located at 637 Marine Drive in Port Angeles and operates under a synthetic minor order that establishes a styrene limit. The 50 Meter facility manufactures the Westport 164 model yacht (50-meter). Westport LLC – Interior relocated from 2140 W 18th Street in Port Angeles to 3500 East Hwy 101, Port Angeles, in the summer of 2018. The Interior Plant manufactures custom furniture and millwork solely for use in Westport's yachts. During the NOC review for this relocation, ORCAA determined that a synthetic minor order was not necessary for the Interior Plant because potential to emit was not above major source thresholds.

There was a facility located at 2850 John Stevens Way in Hoquiam and a facility located in La Conner, but they were permanently closed in July 2016 and approximately 2010, respectively.

These facilities under Westport LLC's control can be considered part of the Title V facility in Westport if they are located on contiguous or adjacent properties and belong to the same two-digit SIC code (WAC 173-401-200(17)). As the Port Angeles facilities are located approximately 160 miles from the Westport facility, they are not contiguous or adjacent to the facility in Westport, and therefore, they are not considered part of the Westport facility with respect to Title V applicability.

5.2 Applicability of New Source Performance Standards (NSPS)

Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (40 CFR Part 60 Subpart IIII)

Not Applicable.
The provisions of Subpart IIII are applicable to manufacturers, owners, and operators of stationary compression ignition (CI) internal combustion engines (ICE) for affected engines. For the purposes of this subpart, the date that construction commences is the date the engine is ordered by the owner or operator.

The Building #5 emergency engine, EU13, and the Building #7 emergency generator, EU12 were ordered and installed prior to July 11, 2005. Therefore, both EU12 and EU13 are not subject to Subpart IIII.

The Building #9 emergency engine, EU11, was ordered after July 11th, 2005 and was manufactured on February 26, 2006. Since the engine was ordered after July 11, 2005 and was manufactured prior to April 1, 2006, Subpart IIII does not apply to EU11.

Industrial-Commercial-Institutional Steam Generating Units (40 CFR Part 60 Subpart Dc)

Not Applicable.
40 CFR Part 60, Subpart Dc (Subpart Dc) contains new source performance standards for steam generating units built after June 9, 1989 and having a maximum design heat input capacity of 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/hr)) or less, but greater than or equal to 2.9 MW (10 MMBtu/hr). Westport LLC has no combustion units at the facility with a heat input rate greater than 10 MMBtu/hr.

5.3 NESHAP Applicability

NESHAP Applicability Recordkeeping

Applicable
40 CFR 63.1(b)(3) and 63.10(b)(3) require sources to keep records of all applicability determinations made. Records need to be retained for each relevant standard (i.e. source is in the source category regulated by the standard) for which the source is not subject. Based on the information currently available from the source (emission units located in Table 3.1 and 3.2 of the TSD), Westport LLC should be keeping applicability determinations for standards in the following regulations:

- Halogenated Solvent Cleaning (Subpart T)
- Wood Furniture NESHAP (40 CFR Part 63 Subpart JJ)
- Organic Liquid Distribution NESHAP (40 CFR Part 63 Subpart EEEE)
- Paper and Other Web Coating (Subpart JJJJ)
- Miscellaneous Metal Parts and Products Surface Coating (Subpart MMMM)
- Printing, Coating, and Dyeing of Fabrics and Other Textiles (Subpart OOOO)
- Metal Furniture Surface Coating (Subpart RRRR)
- Reinforced Plastics Composites Production NESHAP (40 CFR Part 63 Subpart WWWW)
- Reciprocating Internal Combustion Engine NESHAP (40 CFR Part 63 Subpart ZZZZ)
- Industrial, Commercial, and Institutional Boilers and Process Heaters NESHAP (40 CFR Part 63 Subpart DDDDD)
- Paint Stripping and Miscellaneous Surface Coating Operations (Subpart HHHHHH)
- Metal Fabrication and Finishing Source Nine Categories (Subpart XXXXXX)

NESHAPs Determined to be Applicable
The AOP includes requirements in Subparts A and each applicable NESHAP listed below that are applicable to the Westport facility. There is not a simple one-to-one correspondence between requirements in Part 63 and the AOP conditions. Whenever possible, requirements in Subparts A and the applicable NESHAP have been streamlined with existing conditions or combined with

other applicable requirements. If a part of a requirement in Subpart A or the applicable NESHAP was deemed by ORCAA to require special attention, it has been separated out into an independent condition. When the emission unit is subject to only part of a requirement, the inapplicable portions have been omitted from the related permit conditions.

National Emission Standards for Hazardous Air Pollutants for Shipbuilding and Ship Repair (40 CFR Part 63 Subpart II)

Applicable. The Shipbuilding and Ship Repair NESHAP applies to the surface coating operations at shipbuilding and ship repair facilities at a major source. The NESHAP defines ships as marine or fresh-water vessels used for military or commercial operations. Prior to October 2009, Westport had a limit on commercial/military vessel coatings to establish that the facility was not subject to the requirements of 40 CFR Part 63 Subpart II. In October 2009, that limit was removed at the request of Westport so they could manufacture a military vessel. By exceeding the applicable usage amounts defined in this subpart, Westport became an "affected source" as defined in Subpart II. Although Westport does not anticipate coating another commercial or military vessel in the next five years, they have requested to remain an "affected source" under Subpart II in order to provide operational flexibility. Therefore, Subpart II does apply, and applicable requirements were incorporated into the AOP.

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

Applicable. Subpart VVVV (a.k.a. Boat Building MACT) was promulgated on August 22, 2001. The MACT applies to all boat manufacturing facilities that are major sources and that build fiberglass or aluminum boats. As Westport manufactures boats and is a major source of HAPs, this NESHAP applies.

Westport LLC submitted initial notification to EPA per 40 CFR 63.5 on December 21, 2001. Westport LLC was initially constructed prior to July 14, 2000; therefore, it is an existing source with respect to Subpart VVVV per 40 CFR §63.5692.

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

National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (RICE) (40 CFR Part 63 Subpart ZZZZ)

Applicable. Subpart ZZZZ establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from stationary reciprocating internal combustions

engines (RICE) located at major and area sources for HAP emissions. Westport is a major source of HAPs and operates and maintains three emergency diesel engines that are subject to subpart ZZZZ.

The Building #5 generator, EU13, is a 330 HP emergency diesel engine and is considered an existing stationary RICE with respect to Subpart ZZZZ. Ongoing applicable requirements from Subpart ZZZZ, as they apply to EU13, are incorporated into the AOP conditions. These requirements include operation and maintenance requirements, as well as associated recordkeeping. One-time requirements with deadlines which have passed, such as the initial notifications required under subpart ZZZZ, are not included in the AOP conditions.

The Building #7 generator, EU12, is a 643 HP emergency diesel engine and is considered an existing stationary RICE with respect to Subpart ZZZZ. However, as the emergency engine is greater than 500 hp, located at a major source, and is not subject to an emergency demand response program (40 CFR §63.6590(b)(3)(iii)) EU12 does not have to meet the requirements of Subpart ZZZZ and Subpart A, including initial notification requirements. Therefore, the AOP does not contain any applicable requirements for Subpart ZZZZ for EU12.

The Building #9 generator, EU11, is a 717 HP emergency diesel engine and is considered a new stationary RICE with respect to Subpart ZZZZ. However, the only applicable requirement from ZZZZ that applies to EU11 is the requirement to submit an initial notification. Since the initial notification is a past requirement, it is not included in the AOP conditions. Therefore, the AOP does not contain any applicable requirements for Subpart ZZZZ for EU11.

National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial and Institutional Boilers and Process Heaters (40 CFR Part 63 Subpart DDDDD)

Applicable. The National Emission Standards for Hazardous Air Pollutants for Industrial Commercial and Institutional Boilers and Process Heaters was promulgated on September 13, 2004 and applies to all existing, new, or reconstructed industrial, commercial, or institutional boilers and process heaters located at a major source of HAPs.

The Building 7 and 8 propane-fired 2.5 MMBtu/hr boilers used for hydronic floor heating are subject to Subpart DDDDD. At the time of the compliance date for Subpart DDDDD (January 31, 2016), each boiler was diesel-fired and collectively classified as an affected existing source in the “units designed to burn liquid light fuel” subcategory of Subpart DDDDD. Westport conducted the initial tune-ups of each boiler on January 22, 2014 and the required energy assessment was on August 26-27, 2015 and September 3, 2015.

In late 2016 Westport replaced the burners in both units and converted them to propane-fired, placing the boilers in the “units designed to burn gas 1 fuels” subcategory. Westport conducted an initial tune-up of the propane fired boilers on August 25, 2016 and must conduct subsequent tune-ups every five years. Subpart DDDDD contains several ongoing applicable requirements that apply to EU15 and EU16 which includes work practice standards, recordkeeping requirements, and reporting requirements. One-time requirements with deadlines which have

passed, such as the initial notification required under Subpart DDDDD, are not included in the AOP conditions.

Other boilers and process heaters located at Westport are not part of the affected source under Subpart DDDDD as they do not meet the definition of boiler or process heater (see Table 5.3.1 for details).

NESHAPs Determined to be Inapplicable

National Emission Standards for Hazardous Air Pollutants for Halogenated Solvent Cleaning (40 CFR Part 63 Subpart T)
Not applicable. This subpart applies to each individual batch vapor, in-line vapor, in-line cold, and batch cold solvent cleaning machine that uses any solvent containing methylene chloride (CAS No. 75-09-2), perchloroethylene (CAS No. 127-18-4), trichloroethylene (CAS No. 79-01-6), 1,1,1-trichloroethane (CAS No. 71-55-6), carbon tetrachloride (CAS No. 56-23-5) or chloroform (CAS No. 67-66-3), or any combination of these halogenated HAP solvents, in a total concentration greater than 5 percent by weight, as a cleaning and/or drying agent.

Westport does not operate a solvent cleaning machine. Therefore, Westport is not currently subject to Subpart T. If Westport does install a solvent cleaning machine, compliance Subpart T must be achieved immediately upon startup.

National Emission Standards for Hazardous Air Pollutants for Wood Furniture Surface Coating (40 CFR Part 63 Subpart JJ)
Not applicable, via limit set in AOP condition. This subpart applies to each facility that is engaged, either in part or in whole, in the manufacture of wood furniture or wood furniture components and that is located at a plant site that is a major source.

Although Westport does manufacture some wood furniture and components on-site, the majority of the wood furniture is manufactured at their interior shop in Port Angeles. The wood furniture activities at the Westport facility meets the definition of incidental wood furniture manufacturer under the MACT. The owner or operator of a source that meets the definition for an incidental wood furniture manufacturer shall maintain purchase or usage records demonstrating that the source meets the definition outlined in Subpart JJ. *Incidental wood furniture manufacturer* means a major source that is primarily engaged in the manufacture of products other than wood furniture or wood furniture components and that uses no more than 100 gallons per month of finishing material or adhesives in the manufacture of wood furniture or wood furniture components. Westport is required by Condition AR5.1c to maintain purchase or usage records to demonstrate that Westport meets the definition of an incidental wood furniture manufacturer as defined in this Subpart and is therefore not subject to any other provisions of Subpart JJ.

National Emission Standards for Hazardous Air Pollutants for Organic Liquids Distribution (40 CFR Part 63 Subpart EEEE)

Not Applicable. This subpart applies to organic liquid distribution (OLD) operations that are located at, or is part of, a major source of HAP emissions. An OLD operation means the combination of activities and equipment used to store or transfer organic liquids (non-gasoline) into, out of, or within a plant site regardless of the specific activity being performed. Activities include, but are not limited to, storage, transfer, blending, compounding, and packaging. Westport used to have two tanks for resin storage, but they have since been permanently disabled. Subpart EEEE does not apply to Westport since Westport does not store or transfer any organic liquids that contain HAPs listed in Table 1 of this Subpart.

National Emission Standards for Hazardous Air Pollutants for Paper and Other Web Coating (40 CFR Part 63 Subpart JJJJ)

Not applicable. The provisions of this subpart apply to each new and existing facility that is a major source of HAP at which web coating lines are operated. *Web coating line* means any number of workstations, of which one or more applies a continuous layer of coating material across the entire width or any portion of the width of a web substrate, and any associated curing/drying equipment between an unwind or feed station and a rewind or cutting station.

Westport applies polystyrene resin to a fiberglass web in its impregnator process. The resin saturates the fiberglass forming a saturated web that is immediately applied to the mold and rolled to remove air bubbles. The impregnator is defined as a non-atomized resin application method under 40 CFR Part 63 Subpart VVVV and is subject to subsequent requirements from Subpart VVVV. As Subpart JJJJ states that materials that are used to form a substrate are not included in the definition of “coating materials", the impregnator is not considered a web coating line under this NESHAP. Therefore, Westport is not subject to this NESHAP.

National Emission Standards for Hazardous Air Pollutants for Miscellaneous Metal Parts and Products Surface Coating (40 CFR Part 63 Subpart MMMM)

Not applicable. This subpart establishes national emission standards for hazardous air pollutants (NESHAP) for miscellaneous metal parts and products surface coating facilities.

Westport does some powder coating of metal parts (e.g., port holes, grates, window frames, etc.). However, Westport does not conduct any high performance, magnet wire, rubber-to-metal, or extreme performance fluoropolymer coating operations; therefore, Westport’s metal parts powder coating operations would fall under the “general use coating subcategory”. However, all metal parts coating conducted at Westport involves the surface coating of boats or metal parts of boats (including, but not limited to, the use of assembly adhesives) that meets the applicability criteria for Subpart VVVV (Boat Manufacturing). Therefore, miscellaneous metals parts and products surface coating operations are exempt from Subpart MMMM under 40 CFR §63.3881(c)(15). In addition, Westport does not manufacture any personal watercraft[1],

1 *Personal watercraft* is defined in the Subpart as a vessel (boat) which uses an inboard motor powering a water jet pump as its primary source of motive power and which is designed to be operated by a person or persons sitting, standing, or kneeling on the vessel (e.g., a Jet Ski), rather than in the conventional manner of sitting or standing inside the vessel (e.g., yacht).

as defined by Subpart MMMM. Therefore, Westport is exempt from complying with Subpart MMMM, based on the exemption listed in 40 CFR §63.3881(c)(15).

National Emission Standards for Hazardous Air Pollutants for Printing, Coating, and Dyeing of Fabrics and Other Textiles (40 CFR Part 63 Subpart OOOO)

Not applicable. The source category to which this subpart applies is the printing, coating, slashing, dyeing or finishing of fabric and other textiles. This NESHAP specifies three subcategories to which the subpart applies: 1) coating and printing on fabric or other textiles; 2) slashing operations; and 3) dyeing and finishing fabric or other textiles.

The only activity Westport engages in that possibly could meet the definition of one of these activities is use of the impregnator that saturates a fiberglass web substrate with polystyrene resin. The impregnator does not involve any printing, slashing, or dyeing operations.
The definition of *fabric* includes material made of fiberglass, natural fibers, synthetic fibers, or composite. The coating and printing subcategory includes any operation that coats or prints fabric or other textiles. *Coating* means the application of a semi-liquid coating material to one or both sides of a textile web substrate. Additionally, the definition of *coating* in Subpart OOOO does not include finishing where the fiber is impregnated with a chemical or resin to impart certain properties, and a solid film is not formed. Therefore, Westport's lamination activities do not fall under the coating subcategory of this subpart.
Finishing means the chemical treatment of textiles (e.g. with resins) that improves the appearance and/or usefulness of the textile substrate. However, the definition of *textiles* does not include fiberglass.
Therefore, Westport's impregnator operations are not included as an affected source to this subpart.

National Emission Standards for Hazardous Air Pollutants for Metal Furniture Surface Coating (40 CFR Part 63 Subpart RRRR)

Not applicable. This subpart establishes national emission standards for hazardous air pollutants (NESHAP) for metal furniture surface coating facilities. Surface coating is the application of coatings to a substrate using, for example, spray guns or dip tanks. Metal furniture means furniture or components of furniture constructed either entirely or partially from metal. However, surface coating of only small items such as knobs, hinges, or screws that have a wider use beyond metal furniture are not subject to this subpart unless the surface coating occurs at an affected metal furniture source. Westport does not conduct metal furniture coating that would be subject to this subpart.

National Emission Standards for Hazardous Air Pollutants for Reinforced Plastics Composites Production (40 CFR Part 63 Subpart WWWW)

Not applicable. This subpart establishes national emissions standards for hazardous air pollutants (NESHAP) for reinforced plastic composites production that is located at a major source of HAP emissions. However, 40 CFR §63.5787 specifies that if your source is subject to 40 CFR Part 63, Subpart VVVV (Boat Building MACT), and all the reinforced plastic composites you manufacture are used in manufacturing your boats, you are not subject to this subpart.

Westport exclusively produces reinforced plastic composites for the purpose of manufacturing boats and is therefore not subject to this subpart.

National Emission Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations (40 CFR Part 63 Subpart HHHHHH)
Not applicable. Area sources of HAP emissions are subject to this subpart if the facility performs one or more of the activities listed in 40 CFR §63.11170(a). Since Westport is a major source of HAP, this NESHAP does not apply.

National Emission Standards for Hazardous Air Pollutants for Metal Fabrication and Finishing Source Nine Categories (40 CFR Part 63 Subpart XXXXXX)
Not applicable. Area sources of HAP are subject to this subpart if the source is primarily engaged in the operations in one of the nine source categories listed in 40 CFR §63.11514(a). Since Westport is a major source of HAP, this NESHAP does not apply.

Table 5.3.1 Subpart DDDDD Inapplicability Determinations

IEU#	Description	Inapplicability Citation
IEU3	Building #1 propane space heater (1 @ 0.03 MMBtu/hr)	Used for space heating. Does not fall under the definition of a boiler or process heater[1].
IEU4	Building #1 propane powder coat ovens (2 @ .75 and .5 MMBtu/hr)	Does not fall under the definition of a boiler or process heater[1]. The manufacturer of Westport's powder coating ovens confirmed via email on November 14, 2019 that the combustion gases from the ovens come into contact with the process materials.
IEU6	Building #2 Propane Boilers Hydronics Floor Heat (4 units @ .31 MMBtu/hr each)	Meets definition of hot water heater[2]. Exempt per 40 CFR §63.7491(d).
IEU7	Building #3 propane space heaters (1 @ 0.097 MMBtu/hr)	Used for space heating. Does not fall under the definition of a boiler or process heater[1].
IEU8	Building #4 propane boiler hydronics floor heat (2 units @ 0.31 MMBtu/hr each)	Meets definition of hot water heater[2]. Hot water heaters exempt per 40 CFR §63.7491(d).
IEU9	Building #4 propane space heaters (1 @ 0.25 MMBtu)	Used for space heating. Does not fall under the definition of a boiler or process heater[1].
IEU10	Building #5 propane space heaters for booth (2 @ 1.25 MMBtu/hr)	

IEU16	Building #9 Propane Boilers Hydronics Floor Heat (9 units @ 0.31 MMBtu/hr each)	Meets definition of hot water heater[2]. Hot water heaters exempt per 40 CFR §63.7491(d).

[1]*Process heater* means an enclosed device using controlled flame, and the unit's primary purpose is to transfer heat indirectly to a process material (liquid, gas, or solid) or to a heat transfer material (e.g., glycol or a mixture of glycol and water) for use in a process unit, instead of generating steam. Process heaters are devices in which the combustion gases do not come into direct contact with process materials. A device combusting solid waste, as defined in §241.3 of this chapter, is not a process heater unless the device is exempt from the definition of a solid waste incineration unit as provided in section 129(g)(1) of the Clean Air Act. Process heaters do not include units used for comfort heat or space heat, food preparation for on-site consumption, or autoclaves. Waste heat process heaters are excluded from this definition. (40 CFR §63.7575)

[2]*Hot water heater* means a closed vessel with a capacity of no more than 120 U.S. gallons in which water is heated by combustion of gaseous, liquid, or biomass/bio-based solid fuel and is withdrawn for use external to the vessel. Hot water boilers (i.e., not generating steam) combusting gaseous, liquid, or biomass fuel with a heat input capacity of less than 1.6 million Btu per hour are included in this definition. The 120 U.S. gallon capacity threshold to be considered a hot water heater is independent of the 1.6 MMBtu/hr heat input capacity threshold for hot water boilers. Hot water heater also means a tankless unit that provides on demand hot water. (40 CFR §63.7575)

5.2 Applicability of Prevention of Significant Deterioration (PSD)

Not Applicable

In areas that currently meet the National Ambient Air Quality Standards, new major sources and major modifications (as defined under WAC 173-400-113(1)) are subject to federal new source review requirements under the Prevention of Significant Deterioration (PSD) program. The purpose of the PSD program is to maintain air quality in areas that currently meet the standards, and to provide additional air quality protection to areas where maintaining pristine air quality is required. Since all areas in ORCAA's jurisdiction are currently listed as "in attainment" or "unclassified" with respect to the National Ambient Air Quality Standards, the PSD program applies to all new major sources and major modifications in ORCAA's jurisdiction.

The terms "major source" and "major modification" are defined specifically for the PSD program under WAC 173-400-113. For certain special source categories, a major source under the PSD program is one that has a potential to emit greater than 100 tons per year of any pollutant subject to regulation under the Federal Clean Air Act. For general source types, a major source is one that has a potential to emit greater than 250 tons per year or more of any regulated pollutant. The Washington State Department of Ecology has been delegated by the U.S. Environmental Protection Agency to implement Washington's PSD program in ORCAA's jurisdiction. The goal of the PSD program is to ensure that construction of new major stationary sources and major modifications will not significantly degrade areas with pre-existing good air quality.

Westport LLC's plant-wide potential to emit is less than the PSD major source thresholds;

therefore, PSD does not apply.

5.3 Applicability of Compliance Assurance Monitoring (CAM)

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

5.4 Applicability of the State Greenhouse Gas (GHG) Reporting Rule

Not Applicable
According to WAC 173-441-030(1), the State GHG Reporting Rule applies to industrial facilities that emit at least 10,000 metric tons per year of GHG in terms of carbon dioxide equivalents (CO_2e). Based on the size of the combustion units at the facility, potential emissions are approximately 7,800 metric tons of CO_2e. Therefore, the requirements of the State GHG Reporting Rule do not apply.

5.5 Compliance History

There have been a handful of non-compliance events at Westport LLC involving air regulations. They are listed in Table 5.5.1

Table 5.5.1 Summary of Air Compliance History

Year	NOV Number(s)	Description of Violation	Resolution
1974	312 and 313	Open burning without a valid permit and burning of prohibitive.	Paid a civil penalty of $150
1997	1161	Failure to submit annual emission inventory.	NOV was voided once the emission inventory was submitted
2000	1639	Failure to promptly submit supplementary facts and correct information to the air operating permit application.	Paid a civil penalty of $400
2004	2164	Failure to comply with Condition 3.1 of 03AOP279; Westport submitted a NOC application for an addition to Building 7. The approval order had not been issued yet, and an ORCAA employee observed the construction of the new addition.	Paid a civil penalty of $100
2007	2634	Failure to comply with Condition 3.1 of 03AOP279; Construction of Building 9 without	Paid a civil penalty of

		securing ORCAA's prior approval via a NOC.	$4,000
2007	2663 – 2978; 2689; 2690; and 2691.	For the period August 23, 2006 through October 23, 2008, there was an ongoing, continuous violation of 40 CFR Part 63 Subpart VVVV. Specifically, the Model Point Value Average exceeded the MACT HAP limit for the entirety of the violation period.	Paid a civil penalty of $110,000
2008	2824-2831		
2011	3057	Failure to submit semi-annual monitoring report in a timely manner. The report was due March 1, 2011. The report was received April 25, 2011.	Paid a civil penalty of $1,000
2012	3136	Failure to comply with Condition 4.10 of air operating permit #07AOP575 and ORCAA Rule 8.8; the requirement to keep all processes and/or air pollution control equipment in good operating condition and repair. The filters in the powder coating spray booth were severely overloaded with particulate matter.	Paid a civil penalty of $2,000
2013	3265	Failure to submit an annual compliance certification by August 14, 2013 per condition 8.2 of #07AOP575. The report was received on August 29, 2013.	Paid a civil penalty of $3,000
2019	3826	Failure to perform annual maintenance on the 330 HP emergency engine located adjacent to Building 5 as required by 40 CFR Part 63 Subpart ZZZZ. As specified in Table 2C, the following are required: Change oil and filter annually, inspect the air cleaner annually, and inspect hoses and belts annually.	Paid a civil penalty of $2,000

6.0 Notices of Construction

Westport LLC was an existing source that registered with ORCAA as an air contaminant source in 1990. Westport has received numerous Notice of Construction (NOC) approvals from ORCAA for various equipment installations and operational changes. Table 6.1 provides a summary of NOC approvals and conditions from all NOC Order of Approval and the status of each condition in Westport's AOP.

Synthetic Minor Order – 1995 (RESCINDED)
In May 1995, Westport accepted enforceable limitations on the material usage of styrene-containing materials and other hazardous air pollutants. The limitations set forth in this Order were to establish Westport as a Synthetic Minor Source. ORCAA established gallon limits on resin, gelcoats, and other styrene-containing materials, in addition to VOC-containing products such as paints and solvents. The material usage limits restricted emissions of styrene to less than 10 tons per year.

NOC# 657 (EU5)
In July 1995 Westport received conditional approval from ORCAA to construct a new 50-foot by 125-foot building to be used for boat finishing/coating operations. However, this was proposal did not result in an increase of emissions, since the operations were merely relocating from another portion of the facility. At the time this NOC was issued, BACT was determined to be an air filtration system, and the facility was subject to the limits set forth in the Synthetic Minor Order (issued May 1995).

98NOC049 (SUPERSEDED)
In March 1999, Westport received conditional approval from ORCAA to increase the facility wide emission limit to above Title V thresholds. The reason for the increase was two-fold; Firstly, Westport anticipated a growth in sales. Secondly, recent emissions tests conducted by the National Marine Manufacturers Association showed that styrene emissions had been previously underestimated at Westport. Furthermore, a recent emissions test conducted at Westport confirmed that emissions had been underestimated in the past by using AP-42 emission factors. With this Order, ORCAA established a VOC emission limit of 32 TPY, and Westport became a major source.

In addition to the increased emission limit, Westport planned to install additional exhaust/ventilation systems on Buildings #2 and #4, which were the main fabrication buildings at the time.

01MOD181 (SUPERSEDED)
In May 2003, ORCAA issued this NOC to establish a federally enforceable material usage limit to confirm that Westport was not subject to the shipbuilding MACT (Subpart II). There were no changes to PTE or equipment.

04NOC351 (EU7, EU8, EU9)

In April 2004 ORCAA granted conditional approval for Westport to build the Building #7 Annex. The proposal included a new fabrication shop (welding and metal polishing), a machine shop, a carpentry shop (woodworking only), and a fiberglass assembly shop. Controls included a filter system for the welding shop, keeping all doors closed during operations, and ensuring that VOC-containing materials remained in closed containers when not in use.

06NOC462 (EU10)
In June 2006, ORCAA granted conditional approval for Westport to establish a cabinet shop in the Building #7 annex. The bulk of the cabinet manufacturing is done at Westport's Port Angeles location, but this shop is used to repair cabinets that are damaged during shipment or are missing components. The cabinet shop includes an epoxy room, several sanding stations, a paint booth, and a drying room. This NOC established several material-usage limits for specific coating products to ensure compliance with Washington's Air Toxics Rule, Chapter 173-460 WAC.

07NOC554 (EU1, EU4, EU11)
In February 2008, ORCAA conditionally approved the establishment of a new 42,000 ft^2 yacht lamination building (Building #9), a 717 HP diesel-fired emergency generator, and a 10,780 ft^2 addition to Building #4 to serve as a new small parts lamination area. This NOC establishes a 500-hour operation limit for the engine, requires the engine to be equipped with a non-resetting factory installed hour meter, and an opacity limit of 10%.

08NOC598 (EU3)
In July 2008, ORCAA granted conditional approval for Westport to install four new spray booths; two booths to be used for application of fairing compounds and for sanding/grading small parts, and two booths to be used for spray application of primers and topcoats. No changes to material usage limits or emission limits.

08NOC620 (EU9)
In September 2008, ORCAA granted conditional approval for Westport to replace the existing carpentry shop baghouse (originally approved under 04NOC351). This NOC established a 10% opacity limit. No changes to material usage limits or emission limits.

08MOD627 (SUPERSEDED)
In May 2009, ORCAA approved Westport's request to increase the facility-wide VOC limit from 32 tons per year to 40 tons per year because Westport's 2007 actual emissions came very close to the 32-ton year per limit. ORCAA staff determined that NOC# 98NOC046 did not completely account for all VOC containing products used to produce the yachts. Specifically, VOC emissions resulting from the application of topcoats and use of solvents were significantly underestimated. Additionally, NOC# 06NOC462 granted conditional approval for Westport to use VOC-containing materials in the cabinet shop, but the facility-wide VOC limit was not increased. Besides increasing the facility-wide VOC limit to 40 tons per year, no other changes were made.

08NOC630 (EU2)
In October 2008, ORCAA granted conditional approval for Westport to modify the Building 2 ventilation system and install a new mixing booth to be used for mixing paints and cleaning spray equipment. Emissions from the mixing booth are exhausted to the atmosphere through a roof-top stack. The modifications to the ventilation system were done to improve the energy efficiency of the heating system. New building ventilation stacks were installed as part of the project and subsequently emit VOC emissions during fiberglass operations. There was no increase in air pollution associated with this permitting action.

08NOC638 (EU8)
In November 2008, ORCAA granted conditional approval for Westport to replace the existing welding fume control system with a larger fabric air filtration system. The new unit was designed to handle a larger airflow. The pressure drop is measured using a Magnehelic gauge, and filter catch is collected in a 55-gallon steel drum connected to the bottom of the baghouse. No increases in emissions were reviewed as a part of this proposal.

09NOI682 (Obsolete-Temporary Approval)
This Notice of Intent (NOI) was to use a temporary spray area in Building 7, Bay 7. The area was used to spray apply topcoat (~4 gallons).

09MOD701 (EU3, EU5, EU6, and EU7)
This permitting action, issued in October 2009, eliminated the limit on commercial/military vessel coatings established by Condition #5 of 01MOD181. The purpose of this limit was to establish that Westport was not subject to the requirements of 40 CFR Part 63 Subpart II (the shipbuilding MACT). Applicability of the Shipbuilding MACT was triggered at Westport when more than 52.8 gallons of any single coating or more than 264 gallons of all coatings are used to surface coat a commercial or military vessel. Since this MACT only covers coating and not fiberglass work, it only applies to the areas of Westport that are already approved to conduct surface coating on a boat. The plant-wide emission limit of 40 TPY of VOC did not change as a result of this Order.

13NOC978 (EU14)
In September 2013, ORCAA granted conditional approval for Westport to make changes to the powder coating process. Before this approval, the powder coating process at Westport consisted of 3 steps: 1) a 10% nitric acid rinse tank for etching the metal, 2) coating in a powder booth vented through a stack, and 3) curing in a propane-fired oven. In May 2013, ORCAA staff discovered that Westport had modified this process; the nitric acid rinse tanks were replaced with a spray area, an evaporator was installed to process the wastewater, and the powder coating room ventilation system was modified so that it exhausts back into the building. No changes were made to the facility-wide 40 TPY VOC limit.

16NOI1164 (Exempt from NSR)
Westport requested to temporarily roll-apply corrosion control coating to I-beam trailers that used to be constructed on-site. Emissions from this activity were determined to be de-minimis

with respect to NSR.

Table 6.1 Summary of Air Regulatory History

NOC # (date)	NOC Condition	Description (for information only)	Applicability AOP Condition #
Synthetic Minor Order (5/24/95)	Material use limit for resins/gelcoats/paints/solvents established to keep Westport out of the Title V program, thereby establishing Westport as a synthetic minor source by effectively limiting styrene emissions to less than 10 tons per year.		Obsolete with issuance of NOC# 98NOC049 (3/3/99) to increase emissions to become a major source. Rescinded with issuance of NOC# 01MOD181 (5/14/03).
NOC# 657 (7/19/95) Conditional approval of new boat finishing building (Building #5).	1	The owner or operator shall notify ORCAA in writing of the actual date construction is completed within 15 days after such date by completing and returning NOC Form 3 to ORCAA.	Not an ongoing applicable requirement. The equipment was established and ORCAA was notified on June 19, 1996.
	2	The facility and all associated equipment shall be in accordance with the information and specifications as described in the associated NOC application unless otherwise specified by condition in this Approval Order. Deviations from the equipment types, materials, and specifications described in the NOC application which have the potential for increasing air pollution emissions may constitute a violation of this Approval Order and Regulation 1, section 7.09, unless prior approval is given by ORCAA.	Not an ongoing applicable requirement. The equipment was established, and equipment specifications have been verified by ORCAA inspection.

NOC # (date)	NOC Condition	Description (for information only)	Applicability AOP Condition #
	3	**Filter Exhaust:** Air shall be filtered prior to exhausting to the atmosphere. Filters shall be suitable for capture or knockout of overspray. Filters shall be checked on a daily basis and changed if necessary. Building exhaust shall be conducted through a vertical stack with a vertical discharge to the atmosphere at least six feet above the peak roof line. There shall be no flow obstructions at the point of discharge from the stack (i.e. cap). However, a butterfly valve which does not obstruct the exhaust as it exits the stack is acceptable.	Applicable requirement AOP Conditions: AR2.3a M7
	4	**Operation and Maintenance:** An Operation and Maintenance (O&M) plan for purposes of maintaining equipment, attending to the prompt repair of any defective equipment and record-keeping shall be devised and kept on site. The O&M plan shall include, but shall not be limited to, the following measures: a. A required daily check and recording of the filter condition to assure filters are clean, properly seated, and covering all openings. b. Reasonable measures and precautions for minimizing volatile emissions in the shop. c. A semiannual or monthly schedule for cleaning and maintaining the stack and fan blades. Standard procedures for responding to odor and fallout complaints including notifying ORCAA of these occurrences.	Applicable requirement AOP conditions: AR2.3b M3 M4 M7 *Note: Inspecting the stack and fan blades requires quarterly monitoring, as it splits the difference of the time frames listed in Condition #4c.* RK11 R5

NOC # (date)	NOC Condition	Description (for information only)	Applicability AOP Condition #
	5	The terms and conditions in this approval order are enforceable by ORCAA, the Washington Department of Ecology, and the U.S. Environmental Protection Agency, and are in addition to applicable federal, state, and local regulations and standards. Failure to comply with the terms and conditions of this order constitutes a violation of ORCAA Regulation 1 and will be subject to penalties accordingly.	Redundant. This condition simply states the utility of regulatory approval orders.
98NOC049 (3/3/99)	Increase the plant-wide emission limit and install additional exhaust/ventilation systems on buildings #2 and #4 Superseded by 01MOD181 (5/14/03).		
01MOD181 (5/14/03)	Request to modify 98NOC049 Conditions of Approval, including a federally enforceable limit on material usage to confirm that Westport is not subject to the shipbuilding MACT (Subpart II). Superseded by 09MOD701 (10/28/09).		
04NOC351 (4/8/2004) Building 7 Annex – New annex to Building 7 including:	1	**Welding Shop Filter System:** Welding operations shall be conducted only when the filter system is operating properly. Welding fumes shall be filtered using a filter system with a 95% control efficiency or better (per manufacturer specifications)	No longer applicable. Unit replaced (see 08NOC638).

NOC # (date)	NOC Condition	Description (for information only)	Applicability AOP Condition #
Fabrication shop (welding and metal polishing) Machine shop (IEU15) Carpentry shop (woodworking only) Bay Seven (formerly referred to as fiberglass house assembly shop)	2	**Operations and Maintenance Plan:** The owner or operator shall, devise implement and update when necessary, an Operations and Maintenance (O&M) plan for assuring good operating condition and repair of ventilation systems and control devices. The plan shall include procedures for regular inspection and maintenance of all ventilation system and control devices used including filter and dust control systems.	Applicable requirement. AOP Conditions: Bay Seven Lamination: AR1.4a Bay Seven Coating: AR 2.4a Carpentry Shop: AR4.1c Fabrication Shop: AR3.1b *No longer applicable for the carpentry baghouse and the welding fume control system. Both control devices were replaced (see 08NOC620 and 08NOC638).*
	3	**Fugitive Emissions:** All reasonable measures and precautions shall be taken for minimizing fugitive emissions including but not limited to: a. Keeping VOC-containing material in closed containers when not being used; b. Minimizing and promptly cleaning up all VOC materials spills and leaks; c. Keeping all doors closed during operation except when actively loading or unloading materials or products, etc.; and, d. Conducting spray coating, lamination, and other coating operations in approved areas of the facility.	Applicable requirement AOP conditions: AR1.4b AR2.4b AR3.1c (Item c. only) AR4.1d (Item c. only) M4

NOC # (date)	NOC Condition	Description (for information only)	Applicability AOP Condition #
06NOC462 (6/15/2006) Building 7 Cabinet Shop (epoxy room, sanding stations, paint booth, drying room)	1	**Technical Specification.** Pollution generating equipment and control devices at the facility shall be in accordance with the information and specifications as described in the associated NOC application unless otherwise specified by condition in this Approval Order. Deviations from the equipment types, materials, and specifications as described in the NOC application may constitute a violation of this Approval Order and Regulation 1, unless prior approval is given by ORCAA.	Not an ongoing applicable requirement
	2	**Material Use Limit:** The amount of *Eurocryl "U" "NY"* (Antoni Code 578-0500) used, applied or disposed of at the facility shall not exceed 850 gallons per 12-consecutive month period, unless prior approval is granted by ORCAA.	Applicable requirement AOP Conditions: AR5.1a
	3	**Material Use Limit:** The amount of *Eurothane Clear* (Antoni Code 570-0000) used, applied or disposed of at the facility shall not exceed 600 gallons per 12-consecutive month period, unless prior approval is granted by ORCAA.	
	4	**Material Use Limit:** The amount of *Reducer* (Antoni Code SOL-4007) used or disposed of at the facility shall not exceed 412 gallons per 12-consecutive month period, unless prior approval is granted by ORCAA.	
	5	**Material Use Limit:** The amount of *West System Epoxy* (Product Code 105) used or disposed of at the facility shall not exceed 375 gallons per 12-consecutive month period, unless prior approval is granted by ORCAA.	

NOC # (date)	NOC Condition	Description (for information only)	Applicability AOP Condition #
	6	**Material Use Limit:** The amount of *West System Hardener* (Product Code 205) used or disposed of at the facility shall not exceed 80 gallons per 12-consecutive month period, unless prior approval is granted by ORCAA.	
	7	**Monitoring:** The owner or operator shall monitor compliance with the material use limits established in Condition 2, Condition 3, Condition 4, Condition 5, and Condition 6 on a monthly basis.	Applicable requirement AOP Conditions: M10
	8	**Recordkeeping Requirements:** Material use records shall be maintained and updated on a monthly basis. Records shall be sufficient to verify the actual, cumulative amount of coating materials used in terms of gallons per month and 12-consecutive month period. Monthly records shall be retained at the facility for at least two years. At a minimum, material use records shall include the following: a. Purchase invoices indicating the amount of coating materials purchased, date of purchase, and corresponding product identification numbers; b. Actual cumulative use of VOC materials in terms of gallons per month; and, c. Material Safety Data Sheets (MSDS) for all VOC materials used.	Applicable requirement AOP Conditions: RK13

NOC # (date)	NOC Condition	Description (for information only)	Applicability AOP Condition #
	9	**OPERATIONS AND MAINTENANCE**: The owner or operator shall devise, implement and update when necessary, an Operations and Maintenance (O&M) plan for the Building #7 Cabinet Shop assuring good operating conditions and for repair of air pollution control devices. The plan shall at a minimum include the following: a. Keeping VOC containing material in closed containers when not being used; b. Storing all solvents or solvent containing cloth or other material in closed air-tight containers; c. Minimizing and promptly cleaning up all VOC materials spills and leaks; d. Conducting spray-coating operations only in approved spray areas, except for minor touch-up work; and, e. Procedures for operating and maintaining the dust collection system.	Applicable requirement AOP Conditions: AR5.1b M4 M7 RK11
07NOC554 (2/25/08) Building 9 – New yacht lamination building and 717 HP	1	**Technical Specifications:** Pollution generating equipment, air pollution control devices and operations at the facility shall be in accordance with the information and specifications described in the associated NOC application unless otherwise specified by condition in this Order.	Not an ongoing applicable requirement

NOC # (date)	NOC Condition	Description (for information only)	Applicability AOP Condition #
emergency diesel generator Building 4 – Addition for small parts lamination	2	**Diesel Engine Operating Limit:** The total annual operating hours of the Caterpillar C15 diesel engine in Building 9 shall not exceed 500 hours. The hours of operation shall be recorded using a non-resetting, factory-installed engine hour meter.	Applicable requirement AOP Conditions: AR6.2a M18 RK23
	3	**Fuel Sulfur Limit:** The Caterpillar C15 diesel engine in Building 9 shall combust only diesel fuel qualifying as ultra-low diesel (less than 15 ppm sulfur). Demonstration of compliance with this condition shall be based on fuel purchase receipts that indicate the certified percent sulfur of the fuel.	Applicable requirement AOP Conditions: AR6.2b M5 RK24
	4	**Opacity Limit:** Visible emissions from the Caterpillar C15 diesel engine in Building 9 shall not exceed 10% opacity as measured in accordance with EPA 40 CFR Part 60 Appendix A Method 9. This limit does not apply during periods of cold start-up. For the purpose of compliance with this condition, cold start-up shall be defined as the period of time beginning when the engine is started and ending when the temperature of the engine coolant reaches 65.5 °C (150 °F).	Applicable requirement AOP Conditions: AR6.2c M1 M2

NOC # (date)	NOC Condition	Description (for information only)	Applicability AOP Condition #
	5	**Operation Plan:** The owner or operator shall update the facility Operations and Maintenance (O&M) plan to include procedures specific to operation of the new Caterpillar C15 diesel engine, the new ventilation system in Building 9, and the new ventilation system in Building 4.	Applicable requirement AOP Conditions: AR1.2a AR6.2d M7
	6	**Required Records:** The following records shall be maintained on-site for no less than 5 years from origination and made available for inspection by ORCAA upon request: a. The O&M plan required by Condition 6; b. The total number of hours that the Caterpillar C15 diesel engine in Building 9 operates, recorded on at least a monthly basis and shown as a 12-month rolling total; and, c. Purchase invoices indicating the supplier, date, quantity, grade, and sulfur content of all diesel fuel combusted in the Caterpillar C15 diesel engine in Building 9**.**	Applicable requirement AOP Conditions: RK11 RK23 RK24

NOC # (date)	NOC Condition	Description (for information only)	Applicability AOP Condition #
	7	**Reporting Requirements:** Pursuant to the requirements found in 40 CFR Part 63 Subpart ZZZZ, the owner or operator shall submit initial notification to ORCAA and to EPA Region 10, no later than 120 days after initial start-up of the Caterpillar C15 diesel engine in Building 9. The initial notification shall include the following items: a. The name and address of the owner or operator; b. The address (i.e. physical location) of the affected source; c. An identification of the relevant standard that is the basis for of the notification and the source's compliance date; d. A brief description of the diesel engine including the intended use and horsepower rating; and, e. A statement whether the affected source is a major or an area source.	Not an ongoing applicable requirement
08NOC598 (7/1/2008) Building 2 (Small parts lamination) – Four additional spray booths	1	**Technical Specifications:** Pollution generating equipment, air pollution control devices and operations at the facility shall be in accordance with the information and specifications described in the associated NOC application unless otherwise specified by condition in this Approval Order.	Not an ongoing applicable requirement
	2	**Stack Specifications:** There shall be no flow obstructions at the point of discharge from the stack (i.e. cap). However, a weatherproof stack exhaust configuration that does not obstruct the air flow as it exits the stack is acceptable.	AR2.2a

NOC # (date)	NOC Condition	Description (for information only)	Applicability AOP Condition #
	3	**Filters:** Exhaust air from Building 2 Spray Booth 1 and 2 shall be adequately filtered to remove particulate overspray. Filters shall be monitored on a regular basis and shall be replaced whenever damaged or loaded with particulate build-up to an extent that jeopardizes the effectiveness of the spray booth in capturing and controlling the emissions. All filters shall be properly seated and shall cover all openings of the exhaust plenum of the spray booth.	Applicable requirement AOP Conditions: AR2.2b M7
	4	**Opacity Limit:** Building 2 Spray Booth 1 and 2 shall operate at a maximum of 5% opacity as measured by EPA 40CFR Part 60 Appendix A Method 9.	Applicable requirement AOP Conditions: AR2.2c M1 M2
	5	**Operation Plan:** The owner or operator shall update the facility Operations and Maintenance (O&M) plan to include procedures specific to operation of Building 2 Spray Booth 1 and 2 and Building 2 Prep Booth 1 and 2. At a minimum the procedures shall include: a. Procedures for inspecting the filters; and, b. A schedule for inspecting the filters.	Applicable requirement AOP Conditions: AR2.2d M7
	6	**Required Records:** The following records shall be maintained on-site for no less than 5 years from origination and made available for inspection by ORCAA upon request: a. The O&M plan required by Condition 5; and, b. A copy of the Final Determination to 08NOC598.	Applicable requirement AOP Conditions: RK1 RK11

NOC # (date)	NOC Condition	Description (for information only)	Applicability AOP Condition #
08NOC620 (9/18/2008) Building 7 Annex – Replace carpentry shop baghouse	1	**Technical Specifications:** Pollution generating equipment, air pollution control devices and operations at the facility shall be in accordance with the information and specifications described in the associated NOC application unless otherwise specified by condition in this Approval Order.	Not an ongoing applicable requirement
	2	**Baghouse Emission Limit:** Visible emissions from the Building 7 Baghouse shall not exceed 10% opacity for a period or periods aggregating more than 3 minutes in any 1 hour, as determined by the Washington Department of Ecology Method 9A.	Applicable requirement AOP Conditions: AR1.4a M1 M2
	3	**Operation and Maintenance Plan:** The owner or operator shall maintain written procedures in an Operation and Maintenance (O&M) plan that provide instructions for inspection, maintenance, and repair of the Building 7 Baghouse. The compliance assurance plan shall contain, but not be limited to, the following: a. A schedule for inspecting the Building 7 Baghouse; b. Procedures for inspecting the Building 7 Baghouse; and, c. Standard log for recording inspections and repairs of the Building 7 Baghouse.	Applicable requirement AOP Conditions: AR4.1b M7 RK9

NOC # (date)	NOC Condition	Description (for information only)	Applicability AOP Condition #
	4	**Required Records:** The following records shall be maintained on-site for no less than 5 years from origination and made available for inspection by ORCAA upon request: a. The O&M plan required by Condition 3; and, b. A copy of the Final Determination to 08NOC620.	Applicable requirement AOP Conditions: RK1 RK11
08NOC630 (10/31/2008) Changes to Building 2 (Small parts lamination). Modification of building ventilation system and new mixing booth.	1	**Technical Specifications:** Pollution generating equipment, air pollution control devices and operations at the facility shall be in accordance with the information and specifications described in the associated NOC application unless otherwise specified by condition in this Approval Order.	Not an ongoing applicable requirement
	2	**Stack Specifications:** There shall be no flow obstructions at the point of discharge from the stack (i.e. cap). However, a weatherproof stack exhaust configuration that does not obstruct the air flow as it exits the stack is acceptable.	Applicable requirement AOP Conditions: AR1.3a
	3	**Operation Plan:** The owner or operator shall update the facility Operations and Maintenance (O&M) plan to include procedures specific to operation of Building 2 Mixing Booth.	Applicable requirement AOP Conditions: AR1.3b

NOC # (date)	NOC Condition	Description (for information only)	Applicability AOP Condition #
	4	**Required Records:** The following records shall be maintained on-site for no less than 5 years from origination and made available for inspection by ORCAA upon request: a. The O&M plan required by Condition 3; and, b. A copy of the Order of Approval and Final Determination.	Applicable requirement AOP Conditions: RK1 RK11
08NOC638 (11/25/2008) Replacement of Bldg. 7 annex welding fume controls system.	1	**Technical Specifications:** Pollution generating equipment, air pollution control devices and operations at the facility shall be in accordance with the information and specifications described in the associated NOC application unless otherwise specified by condition in this Approval Order.	Not an ongoing applicable requirement
	2	**Operation Plan:** The owner or operator shall update the facility Operations and Maintenance (O&M) plan to include procedures specific to operation of the Building 7 Annex welding emission control baghouse.	Applicable requirement AOP Conditions: AR3.1a M7
	3	**Required Records:** The following records shall be maintained on-site for no less than 5 years from origination and made available for inspection by ORCAA upon request: a. The O&M plan required by Condition 2; and, b. A copy of the Order of Approval and Final Determination to 08NOC638.	Applicable requirement AOP Conditions: RK1 RK11
08MOD627 (5/19/2009)	Request to increase facility-wide VOC limit from 32 TPY to 40 TPY. No equipment changes. Superseded by 09MOD701 (10/28/2009).		

NOC # (date)	NOC Condition	Description (for information only)	Applicability AOP Condition #
09MOD701 (10/28/2009) Eliminates the limit on commercial/military vessel coatings.	1	**COMPLAINTS:** The owner or operator shall monitor air quality related complaints including odor and fallout complaints as follows: a. A contact person shall be available at all times the facility is operating to take complaints and to respond to inquiries regarding facility air emissions; b. Air related complaints received shall be investigated by determining the status of facility operations, status of pollution control equipment, and the rate of emissions at the time of the alleged impacts occurred; c. A standard record of any air related complaint received and the associated complaint investigation report shall be made and shall be retained for at least two years; and, d. ORCAA shall be notified of any air related complaint received as soon as possible but no later than two days after the complaint was received.	Applicable requirement AOP Conditions: M3 RK8 R5
	2	**PLANT-WIDE EMISSIONS LIMIT:** Plant-wide emissions of VOC shall not exceed 40 tons per consecutive 12-month period.	Applicable requirement AOP Conditions: PW12

	3	**EMISSIONS MONITORING:** Compliance with the plant-wide VOC emission limit in condition #2 above shall be monitored as follows: a. The owner or operator shall monitor compliance with the plant-wide VOC limit on at least a monthly basis by computing actual VOC emissions over the previous month and previous 12 consecutive month period; b. Actual emissions of VOC shall be calculated using mass balance methods based on ORCAA approved emission factors, actual materials used over the period, the percent breakdown of methods used to apply the material (spray, impregnator, flow coater, etc.), and the actual percent composition of each unique material; c. Actual material usage in pounds per month of each unique VOC containing material, except for materials purchased in hand held spray cans and materials purchased in containers which are less than one (1) gallon, shall be determined by conducting a monthly facility inventory; d. Results from the monthly inventory shall be cross checked with material purchase records; e. The percent breakdown of the methods used to apply each material shall be determined as specified in the approved Application Methods Audit Plan required in Condition 6; and, f. The VOC composition of each unique material shall be determined based on material safety data sheets (MSDS) and/or Certificates of Analyses specific to each material.	Applicable requirement AOP Conditions: M8 RK13

NOC # (date)	NOC Condition	Description (for information only)	Applicability AOP Condition #
	4	**RECORD KEEPING:** The following records shall be maintained at the site for a minimum of two years and shall be made available for inspection upon request: a. Record of complaint investigation and response; b. Monthly and 12 month cumulative VOC emission records; c. Material usage records from monthly material use inventories; d. Material purchase records for all VOC containing materials used except materials contained in hand held spray cans and materials purchased in containers which are less than one gallon; and, e. Material safety data sheets (MSDS) for all materials described in 4.d above; Monthly record of the percent breakdown of application methods used to apply each unique material.	Applicable requirement AOP Conditions: RK8 RK13
	5	**APPLICATION METHODS AUDIT PLAN:** The owner or operator shall develop and implement an Application Methods Audit Plan with procedures for conducting monthly audits of the methods used to apply each material (spray, impregnator, flow coater, etc). The Application Methods Audit Plan shall include a requirement to conduct audits monthly and shall be submitted to ORCAA for approval.	Applicable requirement AOP Conditions: AR1.1f M9 RK12

NOC # (date)	NOC Condition	Description (for information only)	Applicability AOP Condition #
13NOC978 (9/16/13) Building 1 – Powder Coating: Changes to Metal Etching and Cleaning; New evaporator	1	**Technical Specifications:** Operations at the approved location shall be conducted in accordance with the information and specifications documented in the associated NOC Applications and Final Determinations (#13NOC978) unless specified otherwise by condition in the Order of Approval (#13NOC978). Approved equipment associated with these operations is summarized in Table 1.	Not an ongoing applicable requirement.
	2	**Operation and Maintenance Plan:** Within 90 days of the approval date, the owner or operator shall develop and implement an Operations and Maintenance (O&M) plan for the powder coating preparation process (including the evaporator) to assure continuous compliance with applicable air regulations and standards. The plan shall be updated when necessary and kept in a manual on site, and be made available to all powder coating process operators. At a minimum, the O&M plan shall include the following: a. Procedures for operation and maintenance of the metal cleaning and etching process including procedures for minimizing fugitive emissions; b. Procedures to ensure that the evaporator is operated, maintained and repaired consistent with the manufacturer's specifications; and c. Procedures for monitoring pH of the neutralization tank.	Applicable requirement AOP Conditions: AR7.1a M19

NOC # (date)	NOC Condition	Description (for information only)	Applicability AOP Condition #
	3	**Required Records:** The owner or operator must maintain the records specified in (a) through (b) of this condition in a form suitable and readily available for expeditious review. Records must be kept for 5 years following the date of each recorded action and must be kept on-site or be accessible from a central location by computer or other means: a. Records of maintenance checks and repairs conducted on the evaporator. b. Records of pH monitoring required in Condition 2. c. A copy of this Order of Approval.	Applicable requirement AOP Conditions: RK1 RK11 RK25
16NOI1164 (5/20/2016)	To roll-apply corrosion control coating to I-beam trailers constructed on-site. Emissions were determined to be insignificant and exempt from NSR. Total coating usage would be less than 40 gallons per year.		

7.0 Statement of Basis

7.1 Origin and Authority of AOP Conditions

Per the Washington Air Operating Permit Program under WAC 173-401-600, the regulatory origin and authority for each condition must be stated in an AOP. For Westport LLC's AOP, the origin and authority are stated at the end of each permit condition. The "Origin" cites the local, state, federal regulation or New Source Review permit where the applicable requirement came from. The "Authority" cites the specific section in Chapter 173-401 WAC providing authority to include the requirement in the AOP.

Table 7.1 Required Permit Content, Washington AOP Program

WAC 173-401 Section:	Provides Authority to Include in AOP:
WAC 173-401-600(1)(a)	Federal emissions limits and standards.
WAC 173-401-600(1)(b)	State emissions limits and standards.
WAC 173-401-600(1)(c)	Requirements from permits issued by a local air pollution control authority (NOC and PSD permits).
WAC 173-401-615(1)(a)	Monitoring required by an applicable requirement.
WAC 173-401-615(1)(b)	Periodic monitoring where the applicable requirement does not require specific monitoring (commonly referred to as "gap-filling monitoring).
WAC 173-401-615(1)(c)	As necessary, requirements concerning the use, maintenance, and, where appropriate, installation of monitoring equipment or methods.
WAC 173-401-615(2)	All applicable recordkeeping requirements and require, where applicable: • Records of required monitoring; • Records of changes made at the facility that result in emissions of a regulated air pollutant, but not otherwise regulated under the permit; • Retention of records of all required monitoring data and support information for a period of five years from the date the record originated; • Monitoring support information including all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation; and, • Copies of all reports required by the permit.
WAC 173-401-615(3)	All applicable reporting requirements and require: • Submittal of reports of any required monitoring at least once every six months; and, • Prompt reporting of deviations from permit requirements, including those attributable to upset conditions.

WAC 173-401-620(2)	Standard Title V provisions from WAC 173-401-620(2)
WAC 173-401-605(1)	Emission limitations and standards, including those operational requirements and limitations that assure compliance with all applicable requirements at the time of permit issuance.
WAC 173-401-640(1)	Upon request, the permitting authority shall include in the permit or in a sperate written finding issued with the permit a determination identifying specific requirements that do not apply to the source.

7.2 Permit Administration (Section IV)

Permit administrative conditions (A1-A14) include conditions specifying how the AOP is managed according to the State AOP program under Chapter 173-401 WAC and conditions having implications on assuring compliance with all other conditions in the AOP. Many of the permit administrative conditions are "standard terms and conditions" and required to be in the AOP per either Chapter 173-401 WAC or per federal requirements for AOPs.

The origin of each permit administrative condition is stated at the end of each condition. Authority to include permit administrative conditions comes from primarily from WAC 173-401-600(1)(b), which specifies AOPs contain requirements from the Washington Clean Air Act (Chapter 70A.15 RCW) and rules implementing that chapter (Washington's AOP program is pursuant to RCW 70A.15.2270, which is under the Washington Clean Air Act.).

Permit administrative conditions specify terms of the AOP such as the permit duration, expiration, renewal and revision requirements. They also explain the "Permit Shield," extent of AOP enforceability and how the AOP can be revoked or re-opened for cause. They are essential to the proper functioning of the AOP under the State of Washington Program. Because permit administrative conditions do not include any applicable emissions limitations or operational standards, monitoring is not applicable. However, general recordkeeping and reporting requirements apply. Also, compliance with permit administrative conditions must be certified annually.

7.3 General Terms and Conditions (Section V)

General terms and conditions (G1-G22) cover general compliance and permitting requirements. These conditions are categorized as General Terms and Conditions in the permit because they either have broad implications on multiple conditions in the AOP, or are entire programs that are applicable if triggered, such as the Stratospheric Ozone Protection program. Authority for each condition varies depending on whether the applicable requirement originated from a state or federal regulation.

7.4 Prohibited Activities (Section VI)

Prohibited activities conditions (PA1-PA7) cover general prohibitions. These conditions are

categorized as Prohibited Activities in the permit because they identify broad prohibitions that apply to Title V facilities at all times, such as concealment or masking of emissions. There are no specific monitoring requirements for these prohibited activities because prohibitions inherently do not have any applicable emission limits or operational standards other than just prohibiting the activity altogether. However, compliance with the prohibited activities conditions must be certified annually. Authority for each condition varies depending on whether the prohibited activity originated from a state or federal regulation.

7.5 Applicable Requirements (Section VII)

Applicable requirements cover applicable emissions limits and operating standards from applicable state and federal regulations and New Source Review permits issued by ORCAA. Origin and authority are stated at the end of each condition. All applicable requirements are in their original form except for minor reorganization for ease of implementation. All monitoring details are included in the Monitoring section (Section VIII) of the permit. The following applicable regulations are included in the Applicable Requirements section of the permit:

- General facility-wide standards from Chapter 173-400 WAC and ORCAA's rules;
- 40 CFR Part 63, Subpart VVVV, National Standards for Hazardous Air Pollutants for Boat Manufacturing
- 40 CFR Part 63, Subpart II, National Emission Standards for Hazardous Air Pollutants for Shipbuilding and Ship Repair
- 40 CFR Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (RICE)
- 40 CFR Part 63, Subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial and Institutional Boilers and Process Heaters

7.6 Monitoring Terms and Conditions (Section VIII)

Applicable monitoring terms and conditions (M1-M19) include all required monitoring from applicable federal subparts and New Source Review permits. Origin and authority are stated at the end of each condition. Although applicable monitoring requirements are included in their original form, additions were required to clarify requirements. This is allowed in Title V AOPs under "gap filling monitoring" provisions in WAC 173-401-615(1)(b) and WAC 173-401-615(1)(c). Regulatory origins are stated at the end of each condition.

7.7 Recordkeeping Requirements (Section IV)

Applicable recordkeeping terms and conditions include (RK1-RK25) include all required recordkeeping requirements for Title V AOPs as required under WAC 173-401-615(2). Origin and authority are stated at the end of each condition.

7.8 Reporting Requirements (Section X)

Applicable reporting terms and conditions (R1-R15) include all required reporting requirements

for Title V AOPs as required under WAC 173-401-615(3). Origin and authority are stated at the end of each condition.