

Attbar, Inc.

Title V Basis Statement

Final Issued: December 12, 2007

Southwest Clean Air Agency
11815 NE 99th Street, Suite 1294
Vancouver, WA 98682-2322
Telephone: (360) 574-3058

PERMIT #:	SW97-2-R1
ISSUED TO:	Attbar, Inc. 5985 S 6th Way Ridgefield, WA 98642
PLANT SITE:	Attbar, Inc. 5985 S 6th Way Ridgefield, WA 98642
PERMIT ENGINEER:	John St.Clair, Air Quality Engineer
REVIEWED BY:	Paul T. Mairose, Chief Engineer

TABLE OF CONTENTS

I. General Information and Certification..... 1

II. Emission Unit Descriptions 2

III. Explanation of Insignificant Emission Unit Determinations 3

IV. Explanation of Operating Terms and Conditions 4

V. Explanation of Obsolete and Future Requirements 7

VI. Explanation of Monitoring Terms and Conditions 7

VII. Explanation of Recordkeeping Terms and Conditions 10

VIII. Explanation of Reporting Terms and Conditions 11

IX. Appendix..... 12

X. Permit Actions 13

I. GENERAL INFORMATION and CERTIFICATION

- 1. Company Name:** Attbar, Inc.
- 2. Facility Name:** Attbar, Inc.
- 3. Responsible Official:** Joe Volz, President
- 4. Facility Contact Person:** Phil Volz, General Manager
- 5. Unified Business Identification Number:** 600-055-263
- 6. Primary SIC Code:** 3089

7. Basis for Title V Applicability:

Attbar, Inc. (Attbar) has actual emissions in excess of 10 ton/year (tpy) of styrene which is a hazardous air pollutant (HAP) listed under Section 112 of the Federal Clean Air Act.

8. Attainment Area:

Attbar is located in an area which is in attainment of all criteria pollutant standards.

9. Facility Description:

Attbar produces composite products using Fiberglass Reinforced Product (FRP) and metal molds. FRP molds are fabricated on-site in the Mold Fabrication Shop using patterns that are customer supplied. The mold is sprayed with a primer and releasing agent and then sprayed with a gel coat, which provides a smooth, durable, and scratch-resistant surface. Tooling resins and a variety of core materials and fiberglass are applied after the gel coat to create a mold structure. After the mold is removed from the pattern, gel coat, fiberglass, and resin are applied to the mold to make the final product. There are several techniques that can be used to make FRP, but these techniques typically fall in one of two categories, open molding or closed molding.

Open molding is a technique where a single mold is used and the fiberglass and resin are applied to the mold, either mechanically or by hand, to manufacture the final product. In hand lay-up, fiberglass and gel coat are applied to the mold using rollers and brushes. In mechanical application, resin and chopped glass are sprayed onto the mold. Chop spray-up is a mechanical application technique where strands of fiberglass are fed through a chopper motor mounted on the spray gun where the strands are chopped into small sections just prior to exiting the gun and are combined with non-atomized resin into the mold. If a gel coat is applied, it is applied using a high-volume low pressure (HVLP) or air assisted airless spray gun.

Closed molding utilizes a two-piece mold (male and female), where the resin is applied under vacuum or under direct pressure. Resin transfer molding (RTM) is a closed molding technique where the core material or fiberglass is placed in the molds and resin is injected into the mold under pressure. Closed Cavity Bag molding (CCBM) is a variation of RTM that uses a reusable, flexible silicone mat as the male mold. Vacuum infusion uses a vacuum instead of direct pressure to distribute the resin in the mold. In all closed molding techniques, because the mold remains

closed during the curing process, the material is not exposed to the ambient air and emissions are considerably less than open molding.

II. EMISSION UNIT DESCRIPTIONS

EU-1: Lamination Shop

Both the Lamination Shop and the Mold Fabrication Shop are ventilated using a Frees, Inc. ventilation system that was installed to minimize worker exposure to styrene and to reduce odor. The system takes in outside air through the space heaters, which heat the air as necessary, ventilate the lamination and molding areas, and then vent through the individual stacks. Ventilation through the stacks is not independently controlled. using a Frees, Inc. ventilation system, which brings in outside air through two heaters into the building. For accounting purposes, the individual stacks in the Lamination shop are combined into a single virtual stack 44.3 ft high with a 9.0-foot diameter and a flow of 137,000 acfm.

The Lamination Shop is divided into several areas.

Attbar operates five chop lay-up areas, which include filter for particulate matter (PM) control and various stacks. Three chop lay-up areas are along the south wall of the lamination shop, separated by walls, but open to the main shop area. Each area also has a single Magnum Venus fluid impinger technology (FIT) non-atomized spray gun. The chop lay-up areas are vented through two stacks. Two more chop lay-up areas are located in the northwest corner of the shop divided in to two areas, the "gutting" area and the assembly area. Smaller components are attached to the larger components in the assembly area using adhesives. Once bonded, the assembled parts are moved to the gutting are where additional fiberglass and resin are applied and any repairs necessary are performed. There are two Magnum Venus FIT non-atomized guns, one in each area. Each area is vented through a stack.

Attbar operates three gel coat areas, which are located along the north wall. PM is controlled in each area by filters. Each area has a single Glas-Craft LPA-II-AAC gun. The gel coat areas are vented through three stacks.

The east end of the shop is where the majority of the closed molding takes place – typically light RTM and CCBM. Generally CCBM is performed in the southern part of this area and RTM is performed in both areas. The area is vented through a stack and PM in the area is controlled by filters. There are four RTM guns in this area. The RTM guns are Magnum Venus brand.

EU-1 emits volatile organic compounds (VOCs), toxic air pollutants (TAPs), hazardous air pollutants (HAPs), particulate matter (PM), and products of combustion, nitrogen oxides (NO_x), carbon monoxide (CO), sulfur dioxide (SO₂), VOC, and PM.

EU-2: Mold Fabrication

Production molds are produced on-site from patterns supplied by customers. Mold fabrication activities include hand lay up and spray lay up of catalyzed resin and reinforcing material, bonding of fiberglass components, and encasement of metallic support structures. Upon curing, molds are removed from patterns and used in the lamination shop. The

fabrication shop has one stack and PM is controlled by filters. The area is equipped with one Glas-Craft LPA-II-AAC tooling gun.

EU-2 emits VOC, TAPs, HAPs, PM, and products of combustion (NO_x, CO, SO₂, VOC, and PM).

III. EXPLANATION OF INSIGNIFICANT EMISSION UNIT DETERMINATIONS

Each emissions unit listed as insignificant in the permit application has been reviewed by SWCAA to confirm its status. SWCAA did not confirm the insignificant status for all of the emissions units identified by the Permittee. Emissions units determined to be insignificant by SWCAA are described as follows:

IEU-1: Finishing Operations

A considerable portion of Attbar's facility is dedicated to various surface finishing operations such as sanding, quality inspection, and touch-up painting. These surface finishing operations are entirely enclosed and do not exhaust to the atmosphere. Emissions from these operations are deemed negligible. Air inside the surface finishing area is recirculated internally via a particulate matter filtration system. The filters are changed on an as needed basis to minimize particulate matter in the work area. Emissions from surface finishing operations are insignificant pursuant to WAC 173-401-530(4) and 173-401-532(55).

IEU-2: Post Cure Ovens

At the south end of the Finishing Shop, Attbar has two post cure ovens: a Lynbar natural gas-fired, custom-made oven rated at 0.385 MMBtu/hr and an electric oven rated at 1.1 MMBtu/hr. Both ovens are set to 240°F and are fired for approximately 40 minutes for each heat treating session. There is no stack for either oven. The Lynbar oven has a heat input rate less than 5 MMBtu/hr, and is insignificant pursuant to WAC 173-401-533(2)(e).

IEU-3: Space Heaters

Two natural gas-fired space heaters are used to heat make-up air for the shop during the winter. The heaters are rated at 3.888 MMBtu/hr and are located along the north wall. The heaters do not vent to dedicated stacks but are generally vented through the lamination shop and mold fabrication shop stacks. Each space heater has a heat input rate less than 5 MMBtu/hr, and is insignificant pursuant to WAC 173-401-533(2)(r).

IEU-4: Acetone Still

Attbar operates a small acetone distillation unit which is used to recycle spent acetone solvent. The distillation unit is a prototype without an identified manufacturer or model number. Unit operation does not exhaust to ambient air, and has negligible emissions. The primary purpose of the distillation unit is waste reduction. The distillation unit has a capacity less than 55 gallons, and is insignificant pursuant to WAC 173-401-533(2)(o).

IEU-5: Emulsifier Evaporator

Attbar operates a small evaporation unit which is used to evaporate spent, waterborne emulsifier. The water in the spent emulsifier evaporates, and then exhausts to ambient air. The remaining constituents consist mostly of cured polyester resin which is collected as a solid. Collected resin from the evaporator is either disposed of as waste or ground up and

reused. The majority of the emissions from the emulsifier is water with a very small quantity of VOC. The actual emissions are less than 2 tons/yr VOC and is insignificant pursuant to WAC 173-401-530(4)(d).

IEU-6: Bulk Resin and Day Storage Tanks

Attbar maintains a single 6,000-gallon tank for bulk resin storage located in a separate portion of the Lamination Shop to the northeast. Resin is transferred from the large tanks into two 300-gallon day tanks located in the assembly area of the lamination shop. Tanks are equipped with conservation vents and emergency vents, however, the tanks do not produce any emissions to ambient air during normal operation. The large tank is filled approximately every seven to ten days. The storage tanks are insignificant pursuant to WAC 173-401-530(4).

IV. EXPLANATION OF OPERATING TERMS AND CONDITIONS

Reqs. 1-8 General Standards for Maximum Emissions

WAC 173-400-040

SWCAA 400-040

WAC 173-400-040 and SWCAA 400-040 establish maximum emission standards for various air contaminants. These requirements are general statewide standards, and apply to all sources of air contaminants. Therefore, these standards apply to all emission units at the source, both EUs and IEUs. Pursuant to WAC 401-530(2)(c), the permit does not contain any testing, monitoring, recordkeeping, or reporting requirements for IEUs except those specifically identified by the underlying requirements.

Req. 9 Emission Standards for Combustion and Incineration Units

WAC 173-400-050

SWCAA 400-050

WAC 173-400-050 and SWCAA 400-050 establish maximum emission standards for selected emissions from combustion and incineration units. These requirements apply to all combustion and incineration units at the source, both EUs and IEUs. Pursuant to WAC 401-530(2)(c), the permit does not contain any testing, monitoring, recordkeeping, or reporting requirements for IEUs except those specifically identified by the underlying requirements.

Req. 10 Emission Standards for General Process Units

WAC 173-400-060

SWCAA 400-060

WAC 173-400-060 and SWCAA 400-060 establish maximum particulate matter emission standards for general process units. These requirements apply to all general process units at the source, both EUs and IEUs. Pursuant to WAC 401-530(2)(c), the permit does not contain any testing, monitoring, recordkeeping, or reporting requirements for IEUs except those specifically identified by the underlying requirements.

Reqs. 11-23 SWCAA Air Discharge Permit

ADP 07-2745

There is currently one active Air Discharge Permit (ADP) 07-2745 which applies to operations at this source. This ADP was issued to the Permittee in response to ADP application CL-1730. ADP 07-2745 approved equipment changes and incorporation of terms of the National Emission Standard for Hazardous Air Pollutants (NESHAP) for Boat Manufacturing (Subpart VVVV), and

NESHAP for FRP (Subpart WWWW). ADP 07-2745 establishes the following approval conditions:

- Emissions from FRP and boat manufacturing are limited to 98.1 tpy of VOC, 85.3 tpy of styrene, and 21.0 tpy of acetone based on material component information, raw material consumption, and material balance calculations.
- TAP emissions from FRP and boat manufacturing are limited individually to the applicable small quantity emission rate (SQER) under WAC 173-460, and prohibited from collectively causing the VOC emissions limit to be exceeded.
- Visible emissions from all operations are not to exceed zero percent opacity for more than three minutes in any one hour.
- Emissions from space heater operation are limited to 4.0 tpy NO_x, 1.0 tpy CO, 0.5 tpy of VOC, 0.5 tpy of PM, and 0.25 tpy of SO₂ based on natural gas consumption and AP-42 emission factors.
- Surface coating is required to be performed using high-velocity low-pressure (HVLP) guns with a minimum transfer efficiency of 65%. This is consistent with the best available control technology for this activity.
- Good work practices, as specified by the Permittee, are to be employed to minimize VOC emissions whenever such use will not adversely affect product quality.
- Filters used in particulate matter control systems for the gelcoat booths and lay-up booths operations are required to have a minimum average arrestance of 97% and 80% respectively as determined by ASHRAE test method 52.1-1992.
- All doors and windows are to be kept closed to minimize PM emissions during production and surface finishing operations except when products are moved into or out of the building.
- The Frees system ventilates the gel coat and spray lay-up areas. The requirement is that the system be operated at all times during spray lay-up, which produces the greatest amount of VOC emissions. During periods when the Permittee is only performing hand lay-up, which produces fewer emissions, the requirement is that the ventilation system be operated ten minutes per hour to minimize odors. During closed molding, the emissions are considerably less than other application methods and there is less need to ventilate the shop. When the Permittee is not performing any spray or hand lay-up, the ventilation system can be turned off as there are no emissions to exhaust.
- PM arising from gel coating and chop lay-up is controlled through filtration banks that are tied into the Frees system. A minimum arrestance has been established for the filters.
- Usage records of coatings used on plastic parts and products is required in order to comply with the exemption under 40 CFR 63 Subpart PPPP.

Reqs-24 to 32**40 CFR 63.5680 (Subpart VVVV)**

40 CFR 63 Subpart VVVV is applicable to the facility because of the manufacture of the Aquapod boats. The Subpart establishes a HAP emission limit, which is based on an equation relating the usage records of resin and gel coat to established model point values. Only the quantities of resin and gel coat used in the manufacture of boats is required to be included in the calculation and only the activities related to boat manufacture are subject to Subpart VVVV. The Permittee has several options for demonstrating compliance with the HAP limit, including emissions averaging and the use of compliant materials.

Under the compliant materials option, if the Permittee uses only resins and gel coats with an organic HAP content below the levels listed in 40 CFR 63 Subpart VVVV Table 2, then the facility will meet the HAP limit. Typically, this method is applied on a per resin or per gel coat basis, however, if an individual resin or gel coat cannot meet the organic HAP content in Table 2, there is a provision to calculate a weighted average organic HAP content across an operation (such as a production resin operation, clear gel coat operation, or tooling resin operation).

Under the emissions averaging option, a weighted average model point value is calculated for each operation type. The model point value takes into account the application method and individual HAP content of each resin and gel coat. The model point value and total usage for each operation is used to calculate HAP emissions for all the operations, which is then compared against the HAP limit.

Subpart VVVV also includes limits on HAP content of solvents and work practice standards.

Reqs. 33 to 38**40 CFR 63.5780 (Subpart WWWW)**

40 CFR 63 Subpart WWWW is applicable to the facility because of the manufacture of FRP, mainly the construction of fiberglass truck cabs. The Subpart establishes a HAP emission limit, which is based on an operation type and application method. Only the resins and gel coats not used specifically to manufacture the Aquapods are subject to the Subpart. The Permittee has several options for demonstrating compliance with the HAP limit, including the use of compliant materials, meeting an average organic HAP limit for each operation and application combination, meeting a weighted average emission limit across the facility, or meeting a limit for one application method and using the same material for other applications.

Compliant materials must meet an emission limit on an individual basis. The emission limit is calculated based on a formula and the organic HAP content of the product and varies according to operation and application type. If the calculated emission limit is less than or equal to the HAP emission limit, the facility has demonstrated compliance.

Alternatively, an organic HAP limit can be calculated for each operation and application method by calculating a weighted average HAP emission factor based on the individual HAP content and usage of all resins and gel coats within an operation and application type. The calculated organic HAP limit can be compared against the specified HAP limit to determine compliance.

A facilitywide emission limit can be determined by calculating a weighted average HAP emission limit for all open molding operations. A weighted average emission limit, based on the HAP emission limit for each operation and the resin or gel coat usage within each operation, is

compared against a weighted average organic HAP emission factor. The emission factor is weighted average HAP emission factor based on the individual HAP content and usage of all resins and gel coats within an operation and application type. These two calculated quantities are compared for compliance determination.

The last option is for the Permittee to demonstrate that a resin can meet the organic HAP content in a single operation and then use the same resin across all other operations.

Subpart WWWW also includes limit of HAP content of solvents and work practice standards.

V. EXPLANATION OF OBSOLETE AND FUTURE REQUIREMENTS

Obsolete SWCAA Orders of Approval

SWCAA has issued a total of four Orders of Approval to the Permittee in response to Notice of Construction applications. As identified in Section IV, only one of these Orders is still active. The remaining three Orders have been superseded as described below.

- Order of Approval 80-515 approved installation and operation of particulate matter filtration unit for the control of emissions from grinding operations at 6205 NE 63rd Street in Vancouver, Washington. SWCAA 80-515 became invalid when the Permittee ceased operations at the Vancouver facility.
- Order of Approval 83-681 approved installation and operation of a gel-coat room and filtration media to control overspray from gel-coating operations at 6205 NE 63rd Street in Vancouver, Washington. SWCAA 83-681 became invalid when the Permittee ceased operations at the Vancouver facility.
- Order of Approval 91-1346 approved installation and operation of a spray coating booth and a curing oven at 6205 NE 63rd Street in Vancouver, Washington. SWCAA 91-1346 was directly superseded by SWCAA 96-1915.
- Order of Approval 95-1915 approved relocation of an existing polyester resin plastic (fiberglass) products manufacturing facility to the current location.

Potential Future Applicable Requirement

Attbar is not currently subject to 40 CFR 63 Subpart PPPP "NESHAP for Surface Coating of Plastic Parts and Products" (§63.4480). Attbar does do some limited coating of truck and boat parts, which is done using the existing HVLP guns. However, the facility has maintained the total usage below 378 l/yr (100 gal/yr) of surface coatings that contain HAP, and is therefore not subject to Subpart PPPP under §63.4481(b). If HAP-containing coating usage increases above 100 gallons per year, then the Subpart will become applicable.

VI. EXPLANATION OF MONITORING TERMS AND CONDITIONS

M1. Opacity Monitoring

The applicable requirements cited in this monitoring/recordkeeping section are general requirements drawn from WAC 173-400 and SWCAA 400. These requirements do not directly

establish any specific regime of monitoring or recordkeeping. Consequently, SWCAA has implemented monitoring and recordkeeping requirements under the "gap filling" provisions of WAC 173-401-615. M1 is designed to assure compliance through periodic facility inspections and prompt corrective action. Demonstration of compliance is required in some cases via visible emissions evaluation.

M2. Particulate Matter Emissions Monitoring

The applicable requirements cited in this monitoring/recordkeeping section are general requirements drawn from WAC 173-400 and SWCAA 400. These requirements do not directly establish any specific regime of monitoring or recordkeeping. Consequently, SWCAA has implemented monitoring and recordkeeping requirements under the "gap filling" provisions of WAC 173-401-615. M2 is designed to assure compliance through periodic facility inspections and prompt corrective action.

M3. Complaint Monitoring

The applicable requirements cited in this monitoring/recordkeeping section are general requirements drawn from WAC 173-400 and SWCAA 400. These requirements do not directly establish any specific regime of monitoring or recordkeeping. Consequently, SWCAA has implemented monitoring and recordkeeping requirements under the "gap filling" provisions of WAC 173-401-615. M3 is designed to ensure compliance through prompt complaint response and corrective action.

M4. Fugitive Emissions Monitoring

The applicable requirements cited in this monitoring/recordkeeping section are all general requirements drawn from WAC 173-400 and SWCAA 400. These requirements do not directly establish any specific regime of monitoring or recordkeeping. Consequently, SWCAA has implemented monitoring and recordkeeping requirements under the "gap filling" provisions of WAC 173-401-615. M4 is designed to assure compliance through a combination of prompt complaint response and periodic facility inspections.

M5. Work Practices to Minimize PM Emissions

The applicable requirement cited in this monitoring/recordkeeping section is drawn from ADP 07-2745 Condition 13. The cited requirements do not directly establish any specific regime of monitoring or recordkeeping. Consequently, SWCAA has implemented monitoring and recordkeeping requirements under the "gap filling" provisions of WAC 173-401-15. M6 is designed to assure compliance through periodic facility inspections.

M6. SO₂ Emission Standard

The applicable requirement cited in this monitoring/recordkeeping section is drawn from WAC 173-400-040(6) and SWCAA 400-040(6). WAC 173-400-040(6) and SWCAA 400-040(6) limit the emission of SO₂ from combustion sources to a maximum of 1000 ppm_v corrected to a specified oxygen percentage. The combustion units at this source are only fired with natural gas or propane which have extremely low sulfur contents relative to other fuels. Based on stoichiometric analysis, it is not physically possible for the combustion sources in question to exceed the limit of 1000 ppm_v SO₂ while firing on these fuels. Monitoring has therefore been limited to certification of fuel type.

M7. Emission from Heating Units

The applicable requirement cited in this monitoring/recordkeeping section is drawn from ADP 07-2745 Condition 48 for determination of compliance with Condition 4. Compliance with this requirement is calculated based on natural gas consumption and AP-42 Section 1.4 (July 1998) emission factors for natural gas combustion. M8 is designed to collect and retain fuel consumption data which will then be used to calculate facilitywide emissions.

M8. FRP and Boat Manufacture Emissions and Usage

The applicable requirement cited in this monitoring requirement is drawn from ADP 07-2745 Condition 31. The data required to be collected for this condition is used to determine compliance with ADP 07-2745 Conditions 1, 2, 5, 9, 20, and 26.

M9. PM Filter Monitoring

The applicable requirement cited in this monitoring/recordkeeping section is taken from Order of Approval SWCAA 96-1915, Section 12.g. Compliance with the applicable requirement is based on proper installation and operation of the particulate matter filters and review of technical specifications provided by the filter manufacturer. M12 is designed to monitor filter replacement and collect and maintain filter technical specifications.

M10. Organic HAP Content Determination – Boat Manufacture

The applicable requirement cited in this monitoring section is taken from 40 CFR 63.5758 (Subpart VVVV). HAP content determination is necessary for determination of compliance with the Subpart VVVV organic HAP content limit and the solvent HAP content limits.

M11. Organic HAP Content Determination – FRP Manufacture

The applicable requirement cited in this monitoring section is taken from 40 CFR 63.5797 (Subpart WWWW). HAP content determination is necessary for determination of compliance with the Subpart WWWW organic HAP content limit.

M12. Standards for Resin and Gel Coat Mixing Operations – Boat Manufacture

The applicable requirement cited in this monitoring section is taken from 40 CFR 63.5731 (Subpart VVVV). The requirement specifies work practice standards for resin and gel coat mixing operations as well as monthly inspection requirements.

M13. Standards for Resin and Gel Coat Application Equipment Cleaning Operations – Boat Manufacture

The applicable requirement cited in this monitoring section is taken from 40 CFR 63.5734 (Subpart VVVV). The requirement specifies a HAP limit of less than 5% and work practice standards for resin and gel coat equipment cleaning operations.

M14. HAP Limit Exemption, Military Specification Resin – Boat Manufacture

The applicable requirement cited in this monitoring section is taken from ADP 07-2745 Condition 20. In cases where a resin or gel coat needs to meet a military specification and the HAP content would exceed the applicable HAP content, a record of the use of the exemption under §63.5698(d)(1) is required to be kept and submitted to SWCAA.

M15. HAP Limit Exemption, Touch-Up Tooling Gel Coat

The applicable requirement cited in this monitoring section is taken from ADP 07-2745 Condition 36. Touch up tooling gel usage that does not exceed 1% by weight of all gel coat used at the facility over a 12-month period is exempt from the HAP limit. A record of the use of the exemption under §63.5698(d)(2) is required to be kept and submitted to SWCAA.

M16. HAP Limit Exemption, Skin Coat Vinylester Resin– Boat Manufacture

The applicable requirement cited in this monitoring section is taken from ADP 07-2745 Condition 37. Pure 100% vinylester resin used for skin coat that does not exceed 5% by weight of all resin used at the facility over a 12-month period is exempt from the HAP limit. A record of the use of the exemption under §63.5698(d)(3) is required to be kept and submitted to SWCAA.

M17. HAP Limit Exemption, Military Specification Resin – FRP Manufacture

The applicable requirement cited in this monitoring section is taken from ADP 07-2745 Condition 26. In cases where a resin or gel coat needs to meet a military specification and the HAP content would exceed the applicable HAP content, a record of the use of the exemption under §63.5790(d) is required to be kept and submitted to SWCAA.

M18. Solvent HAP Content – FRP Manufacture

The applicable requirement cited in this monitoring section is taken from 40 CFR 63.5737(a) and (b) and is a work practice standard. The standard prohibits the use of cleaning solvents containing HAP, with some exceptions.

M19. Coating Usage

The applicable requirement is taken from ADP 07-2745. Monitoring is required to demonstrate compliance with the exemption under 40 CFR Subpart PPPP.

VII. EXPLANATION OF RECORDKEEPING TERMS AND CONDITIONS**K1. General Recordkeeping**

This reporting section is taken directly from WAC 173-401-615(2). Sections a-c were added to clarify specific requirements.

K2. Operation and Maintenance Log

This recordkeeping requirement is directly from ADP 07-2745 Condition 32.

K3. Coating Usage

This recordkeeping requirement is directly from ADP 07-2745 Condition 34.

K4. HAP Limit Compliance (Boat Manufacture) – Emissions Averaging Averaging.

Specific recordkeeping requirements are listed in §63.5704(a) and §63.5707 when using emissions averaging option for determining compliance with the Subpart VVVV organic HAP limit. Additional recordkeeping requirements are from ADP 07-2745 Condition 38.

K5. HAP Limit Compliance (Boat Manufacture) – Compliant Materials Option

Specific recordkeeping requirements are listed in §63.5704(b) when using the compliant materials option for determining compliance with the Subpart VVVV organic HAP limit. Additional recordkeeping requirements are from ADP 07-2745 Condition 39.

K6. MACT Records – Boat Manufacture

Specific recordkeeping requirements are listed in §63.5767 and by ADP 07-2745 Condition 38.

K7. HAP Limit Exemption, Military Specification Resin – FRP Manufacture

40 CFR 63.5790(d) specifically requires that a record be kept whenever the Permittee uses the military specification exception. A military specification for a explicit resin or for a explicit HAP content that would not be able to meet the requirements under Subpart WWWW is excluded provided that the military procurement officer certifies the specifications.

K8. MACT Records – FRP Manufacture

Specific recordkeeping requirements are listed in §63.5915 and by ADP 07-2745 Condition 45.

VIII. EXPLANATION OF REPORTING TERMS AND CONDITIONS**R1. Excess Emissions and Deviations from Permit Conditions**

The Permittee is required to report all permit deviations. This reporting section is taken directly from WAC 173-401-615(3).

R2. Complaint Reports

The Permittee is required to report all complaints to SWCAA within three days of receipt to ensure prompt complaint response.

R3. Semiannual Monitoring Reports

The Permittee is required to provide a report of all monitoring records and provide a certification of all reports on a semi-annual basis. Semi-annual reporting and certification of monitoring records is required by WAC 173-401-615(3).

Other semi-annual reporting requirements were grouped by the required reporting date. A Responsible Official must certify all reports required by the Title V permit that were submitted during the semi-annual period.

R4. Semiannual Compliance Reports – Boat Manufacture

There are specific semiannual report items required under §63.57910. Under §63.5910(b)(5) facilities with an alternate schedule of submittals for Title V semiannual monitoring reports may submit according to the schedule in the Title V permit. Under WAC 173-401-615, semiannual reports are due at least every six months. SWCAA has established April 15 and October 15 as the due dates for semiannual monitoring reports.

R5. Semiannual Compliance Reports – FRP Manufacture

There are specific semiannual report items required under §63.5764. Under §63.5764(b)(5) facilities with an alternate schedule of submittals for Title V semiannual monitoring reports may submit according to the schedule in the Title V permit. Under WAC 173-401-615, semiannual

reports are due at least every six months. SWCAA has established April 15 and October 15 as the due dates for semiannual monitoring reports.

R6. Annual Reports

The Permittee is required to report and certify compliance with all permit terms and conditions on an annual basis. Annual compliance certification is required by WAC 401-630(5). In addition, each applicable annual reporting requirements required by an Air Discharge Permit or federal regulation is listed in this section.

R7. Emission Inventory Reports

The Permittee is required to report an inventory of annual emissions as provided in WAC 173-400-105 and SWCAA 400-105.

R8. Military Specification Exemption – Boat Manufacture

The Permittee is required to submit information pertaining to a resin that is subject to the military specification exemption as per ADP 07-2745 Condition 52.

R9. Military Specification Exemption – FRP Manufacture

The Permittee is required to submit information pertaining to a resin that is subject to the military specification exemption as per ADP 07-2745 Condition 35.

IX. APPENDIX

Appendix A contains the method by which visible emissions from the Permittee's operations are to be evaluated when performing required monitoring. SWCAA has traditionally determined compliance with local visible emissions standards using EPA Method 9 with modified data reduction. Upon review, EPA Region X commented that such use of EPA Method 9 was inappropriate for this source. SWCAA has therefore exercised its latitude under SWCAA 400-105(4) "Source Testing" to approve an alternative test method in advance for visible emissions evaluation. Approval has been granted via signature of this permit by SWCAA's Executive Director. The alternative method shall be used to determine compliance only with state and local opacity standards. Determination of compliance with any federally established opacity standard requires that EPA Method 9 be performed.

X. PERMIT ACTIONSPrevious Actions – AOP SW-2-R0

1. Initial Permit Application Submitted:	April 9, 1996
2. Permit Application Deemed Complete:	April 11, 1996
3. Permit Application Sent to EPA:	March 14, 1997
4. Draft Permit Issued:	March 14, 1997
5. Proposed Permit Issued:	June 27, 1997
6. Final Permit Issued:	August 14, 1997
7. Permit Expiration:	August 14, 2002
8. Renewal Permit Application Due:	February 14, 2002

Current Actions – AOP SW-2-R1

1. Renewal Permit Application Submitted:	February 14, 2002
2. Permit Application Deemed Complete:	August 8, 2002
3. Permit Application Sent to EPA:	September 11, 2007
4. Draft Permit Issued:	September 11, 2007
5. Proposed Permit Issued:	October 23, 2007
6. Final Permit Issued:	December 12, 2007
7. Permit Expiration:	December 12, 2012
8. Renewal Permit Application Due:	December 12, 2011