Puget Sound Clean Air Agency

Notice of Construction No. **11660**

HEREBY ISSUES AN ORDER OF APPROVAL TO CONSTRUCT, INSTALL, OR ESTABLISH

Registration No. **29390**

Date

Two dry filter system spray coating booths rated at 10,000 cfm each for fiberglass boat building operations.

Facility-wide synthetic minor emission limit on styrene and total hazardous air pollutants.

OWNER

Fluid Motion
25802 Pacific Hwy S
Kent, WA 98032

INSTALLATION ADDRESS

Fluid Motion
17341 Tye St. SE
Monroe, WA 98272

THIS ORDER IS ISSUED SUBJECT TO THE FOLLOWING RESTRICTIONS AND CONDITIONS

1. Approval is hereby granted as provided in Article 6 of Regulation I of the Puget Sound Clean Air Agency to the applicant to install or establish the equipment, device or process described hereon at the INSTALLATION ADDRESS in accordance with the plans and specifications on file in the Engineering Division of the Puget Sound Clean Air Agency.
2. This approval does not relieve the applicant or owner of any requirement of any other governmental agency.

Facility-wide Limits:

3. Fluid Motion shall limit facility-wide emissions of the following pollutants during any consecutive 12 month period to:
    a. 9.0 tons styrene; and
    b. 10 tons total hazardous air pollutant (HAP).

4. Fluid Motion must not exceed 15 lamination workers per 24-hour period. Compliance with this limitation shall be demonstrated through employee schedules or other personnel documentation.

5. Gel coat and resins used for open molding operations shall not exceed the organic hazardous air pollutant (HAP) limits shown below using a 12-month rolling weighted average. Compliance with this condition shall be demonstrated through Safety Data Sheets and a record of each materials used.

Operation	Application Method	Total Organic HAP limit (% weight)
Production resin operations	Non-atomized	35%
	HVLP, electrostatic spray	

Pigmented gel coat operations	equipment, airless spray equipment, or nonatomizing methods	33%
Clear gel coat operations	HVLP, electrostatic spray equipment, airless spray equipment, or nonatomizing methods and applied with spray applicators not to exceed 1 quart capacity	48%
Tooling resin operations	Non-atomized	39%
Tooling gel coat operations	HVLP electrostatic spray equipment, airless spray equipment, or nonatomizing methods	40%

6. Adhesives shall not exceed the organic hazardous air pollutant (HAP) limits shown below using a 12-month rolling weighted average. Compliance with this condition shall be demonstrated through Safety Data Sheets and a record of each materials used.

Operation	Application Method	Total Organic HAP limit (% weight)
Adhesives	Non-atomized or hand-held aerosol spray cans (less than 1 quart capacity)	5%

7. Fluid Motion shall not allow visible emissions from the spray coating operations.

8. Fluid Motion shall not apply coatings containing chromium, lead, manganese, nickel, or cadmium. Fluid Motion shall not use methylene chloride (MeCl) for the removal of dried paint (including, but not limited to paint, enamel, varnish, shellac, and lacquer) from wood, metal, plastic and other substrates.

Operational Requirements:

9. During resin or gel-coat operations all doors, windows, and other openings in the active lamination building (except for exhaust stacks) shall be closed except to allow intermittent passage of personnel and equipment during resin application and gel coat application activities.

10. Fluid Motion shall use in these booths only nonatomizing methods for resin application.

11. Fluid Motion shall use in these booths only spray equipment that achieves transfer efficiency equal to or greater than 65%, which includes but is not limited to, HVLP or air assisted airless spray guns, for the application of gel-coat. Fluid Motion shall maintain records onsite demonstrating the spray equipment's efficiency.

12. Spray booth exhaust filters shall have a capture efficiency of 98% or greater, as demonstrated consistent with ASHRAE Method 52.1, Gravimetric and Dust Spot Procedures for Testing Air Cleaning Devices Used in General Ventilation for Removing Particulate Matter, or equivalent test method accepted by the Agency.

13. The spray booths shall be equipped with a gauge (manometer or magnehelic) to measure the pressure drop across the exhaust filters. Within 30 days after the start of operation, the acceptable pressure drop range shall be clearly marked on or near the gauge. The minimum pressure drop shall not be less than the pressure drop measured with a clean, properly installed filter.

14. The owner or operator shall visually inspect all HAP/VOC material containers at the facility at least once per week. The inspection should ensure that all containers have covers with no visible gaps between the cover and the container, or between the cover and equipment passing through the cover. If any visible gaps are noted, the owner or operator shall take immediate corrective action to close the cover over the container. The owner or operator shall keep contemporaneous record of the results of the inspection including a description of corrective actions taken. The record shall include, at minimum, the following information:

    a. Operator's name;

    b. Date of inspection;

    c. Confirmation of closed containers; and

    d. The description of corrective action taken, if any.

15. At least once each operating day, prior to conducting open molding operation in a given spray room, the owner or operator shall inspect the associated dry filter system to ensure that:

    a. The pressure drop measurement device is operating;

    b. The pressure drop across the exhaust filter is within acceptable range recommended by the manufacturer; and

    c. The filter is properly installed, seated, and secured.

16. If requirements as described by Condition 15 are not met, the owner or operator shall discontinue the

operations and take corrective action. The owner or operator shall only resume operation after the requirements as described by Condition 15 are met.

17. Fluid Motion shall monitor the immediate area outside the building for detectable odors from their facility at least once every calendar week (Sunday through Saturday) during lamination. For at least one hour immediately prior to monitoring, the person performing the monitoring must remain in an atmosphere free of organic HAP odor and may not be inside the facility. If any odors from the facility are detected at or beyond the building during the monitoring or at any other time, the owner or operator shall immediately initiate corrective action to minimize the odor. The owner or operator shall keep contemporaneous record of the results of the inspection including a description of corrective actions taken. The record shall include, at minimum, the following information:

    a. Operator's name;

    b. Date of inspection;

    c. Presence or absence of organic HAP odors; and

    d. The description of corrective action taken to minimize odors.

Recordkeeping:

18. To demonstrate compliance with Condition 3 Fluid Motion shall, within 30 days of the end of each month, calculate and record the monthly emissions of styrene and total HAP for that month and for the previous 12-month period ending in that month.

    a. Emissions of styrene and methyl methacrylate shall be calculated using the Unified Emission Factors for Open Molding of Composites; and

    b. Emissions of all other HAPs shall be calculated using materials balance.

19. To demonstrate compliance with Conditions 5 and 6 Fluid Motion shall record:

    a. Organic HAP content of each resin and gelcoat applied each month.

    b. Application method for each production resin and tooling resin applied each month.

    c. Amount of resin and gelcoat applied each month.

    d. If each resin and gelcoat is not greater than the organic HAP content specifications in the tables of Condition 5 and 6 then compliance has been demonstrated.

    e. For any month where a resin or gelcoat exceeds the specifications in the tables of Condition 5 and 6 then for the category of material and application method calculate the previous 12-month rolling weighted average using the calculation method in 40 CFR 63.5713 equation 1.

20. The following records shall be kept onsite and up-to-date for at least two years from the date of generation, and be made readily available to Agency personnel upon request:

    a. Documentation of dry filter overspray efficiency for each lamination booth as specified in

Condition 12

b. Documentation of transfer efficiency of any atomizing spray guns used for gel coat application as specified in Condition 11

c. Results of inspections to determine compliance with HAP containment as required by Condition 14 and of inspections to determine compliance with the dry filter system as required by Condition 15 and of inspections to determine compliance with the odor complaint response as required by Condition 17; and

d. Personnel data demonstrating compliance with the limit on active lamination workers specified in Condition 4.

Reporting:

21. If any of the calculations carried out in Condition 19 demonstrates a value exceeding one of the organic HAP specifications in Condition 5 or 6, provide a report to the agency within 30 days of the end of the month in which the calculation was carried out showing the calculation, the data that was used in the calculation, and the value calculated.

22. If the emissions of styrene exceed 9.0 tons per 12-month rolling period or if the total HAP emissions exceed 10 tons per 12-month rolling period as limited in Condition 3, Fluid Motion must provide a report to the agency within 30 days of the end of the month in which the calculation was carried out showing the calculation, the data that was used in the calculation, and the value calculated.

23. Upon issuance, this order NOC 11660 cancels and supersedes NOC 10220.

APPEAL RIGHTS

Pursuant to Puget Sound Clean Air Agency's Regulation I, Section 3.17 and RCW 43.21B.310, this Order may be appealed to the Pollution Control Hearings Board (PCHB). To appeal to the PCHB, a written notice of appeal must be filed with the PCHB and a copy served upon Puget Sound Clean Air Agency within 30 days of the date the applicant receives this Order.

Madeline McFerran
Reviewing Engineer

John Dawson
Engineering Manager