



Puget Sound Clean Air Agency

Notice of
Construction No. **12505**

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

Registration No. **30500**
Date

Fiberglass boat manufacturing consisting of 7 fabrication bays each with 20,000 scfm exhaust stacks and overspray filtration system meeting at least 98% control. Each fabrication bay is 71,400 cubic feet volume.

OWNER

Fluid Motion LLC
17300 Tye St SE
Monroe, WA 98272

INSTALLATION ADDRESS

Fluid Motion LLC
506 44th St NW
Auburn, 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.

Specific Conditions:

3. During resin or gel-coat operations all doors, windows, and other openings in the 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.
4. Each of the 7 fiberglass fabrication spray bays shall be equipped with a dry filtration system with minimum control efficiency of 98%. Compliance with this condition shall be demonstrated through use of manufacturer specifications or equivalent.
5. The dry filter systems serving the lamination bays shall each be equipped with a gauge (manometer or magnehelic) to measure pressure drop across the exhaust filters. 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.
6. Styrene emissions from the combined 7 lamination bays must not exceed 39 tons per 12 month rolling period.
7. The lamination activities must meet the following operational limitations:
 - a. The facility must not operate for more than 6,240 hours per year. Compliance with this limitation may be demonstrated through operational logs.
 - b. Boats fabricated must not exceed 45 feet. Compliance with this limitation may be demonstrated through production data.
 - c. Fabrication is limited to 33 lamination workers per 8-hour shift. Compliance with this limitation may be demonstrated through employee schedules or other personnel documentation.

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8. Gel coat and resins used for open molding operations shall not exceed the organic hazardous air pollutant (HAP) limits shown below. Compliance with this condition shall be demonstrated through Safety Data Sheets and a record of each material used.

| <u>Operation</u> | <u>Application Method</u> | <u>Total Organic HAP limit (% weight)</u> |
|-------------------------------|---|---|
| Production resin operations | Non-atomized | 35% |
| Pigmented gel coat operations | HVLP, electrostatic spray 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% |

9. Adhesives shall not exceed the organic hazardous air pollutant (HAP) limits shown below. Compliance with this condition shall be demonstrated through Safety Data Sheets and a record of each materials used.

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

10. The amount of clear gel coat applied to each boat shall not exceed 1 gallon. The owner or operator shall track and record the amount of clear gel coat used on each boat.
11. The owner or operator shall use only nonatomizing methods for production and tooling resin application.
12. Gel coat shall only be applied with one of the following options: high-volume low-pressure (HVLP) spray equipment; electrostatic spray equipment; airless spray equipment, or nonatomizing methods.
13. 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 & time of inspection;

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- c. Confirmation of closed containers; and
 - d. The description of corrective action taken, if any.
14. At least once each operating day, prior to conducting open molding operation in each lamination bay, 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.
15. If requirements as described by Condition #14 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 #14 are met.
16. The owner or operator shall keep the Condition #14 dry filter system inspection records in a written log contemporaneously. The records shall at least include the following, but not limited to:
- a. The date and time of the inspection;
 - b. The name of the person conducted the inspection;
 - c. The pressure drop;
 - d. Confirmation that the filter is not installed backwards, is properly seated and is tightly secured; and
 - e. The corrective action conducted, if any.
17. The owner or operator shall use cleaning solvent that does not contain any VOC or HAP for resin and gel coat application equipment cleaning. Compliance with this condition shall be demonstrated by manufacturers' records of the cleaning solvent content.
18. The owner or operator shall monitor and record quantities of all purchases of raw materials on a monthly basis. Raw materials include all products used at the facility that contribute to HAP and VOC emissions. The owner or operator shall maintain, on-site, safety data sheets or certified product data sheets for these products.
19. To demonstrate compliance with Condition #6, the owner or operator shall, within 30 days of the end of each month, calculate and record the monthly emissions of styrene for the previous 12-month period ending in that month. Emissions of styrene shall be calculated using the Unified Emission Factors for Open Molding of Composites.
20. The owner or operator shall determine the organic HAP content for each material used in the open molding resin and gel coat operations, carpet and fabric adhesive operations by using information from the supplier or manufacturer of the material. If the organic HAP content is provided by the material supplier or manufacturer as a range, then the owner or operator shall use the upper limit of the range for determining compliance.
21. The owner or operator shall monitor the immediate area outside the building for detectable odors from their facility at least once every calendar week (Sunday through Saturday). 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:

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- a. Operator's name;
 - b. Date & time of inspection;
 - c. Presence or absence of organic HAP odors; and
 - d. The description of corrective action taken to minimize odors.
22. The following records shall be kept onsite and up to date for at least five years from the date of generation, and be made readily available to Agency personnel upon request:
- a. Documentation of dry filter overspray efficiency as specified in Condition #4;
 - b. Documentation of the total styrene 12-month rolling emissions as specified in Condition #6;
 - c. Documentation of the amount of clear gel coat applied to each boat as specified in Condition #10;
 - d. Documentation of transfer efficiency of any atomizing spray guns used for gel coat application as specified in Condition #12;
 - e. Safety data sheets demonstrating compliance with the organic HAP limits specified in Conditions #8 and #9 and with the cleaning solvent requirements specified in Condition #17
 - f. Results of inspections to determine compliance with HAP containment as required by Condition #13 and of inspections to determine compliance with the dry filter system as required by Condition #14 and of inspections to determine compliance with the odor monitoring as required by Condition #21; and
 - g. Product data and personnel data for Building 2 and Building 3 and documentation of facility-wide operating hours as required by Condition #6.
23. 40 CFR 63 Subpart VVVV applies to this facility. The facility must submit 40 CFR 63 Subpart VVVV compliance notifications and reports as required by 40 CFR 63 Subpart VVVV as well as electronically to PSCAA by email.
24. WAC 173-401 applies to this facility. The facility must file a complete application for a chapter 401 permit within twelve months after commencing operation, according to the requirements of WAC 173-401.

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