Statement of Basis for
Fluid Motion, LLC – Arlington
Initial AOP
July 9, 2024

1 Purpose of this Statement of Basis

1.1 General

This document summarizes the legal and factual bases for the draft permit conditions in the Fluid Motion, LLC- Arlington (Fluid Motion) air operating permit to be issued under the authority of the Washington Clean Air Act, Chapter 70A.15 Revised Code of Washington, Chapter 173-401 of the Washington Administrative Code and Puget Sound Clean Air Agency (PSCAA) Regulation I, Article 7. Unlike the permit, this document is not legally enforceable. It includes references to the applicable statutory or regulatory provisions that relate to Fluid Motion emissions to the atmosphere. In addition, this Statement of Basis provides a description of the facility's activities and a compliance history.

2 Why Fluid Motion is an Air Operating Permit Source

Fluid Motion is a major source of hazardous air pollutants. The potential styrene emissions are 59.6 tons/year, above the 10 ton/year threshold for a single HAP. Potential total HAP emissions are 64 tons/year, above the 25 ton/year threshold for total HAP. Fluid Motion is not a "major source" of criteria air pollutants.

3 Source Location and Description

Fluid Motion is a fiberglass boat manufacturing facility producing 25 foot- 45 foot fiberglass pleasure boats through lamination of successive layers of gelcoat, vinylester resin, polyester resins and fiberglass inside open female molds. Different molds are used to make decks, hulls, and small parts comprising the boat.

The same lamination process is conducted in both the East Lamination Building and the West Lamination Building at the facility, though about one third of production occurs in the West Lamination Building and the remaining two thirds of production occur in the East Lamination Building. The East Lamination Building produces larger boats (20-45 feet) and the West Lamination building produces smaller boats (20-29 feet).

The process is outlined below:

1. Boat mold prep (cleaning and applying wax release agent)
2. Gel coat spray coated into mold
3. Fiberglass chop applied on top of gel coat layer in mold
4. Layered application of resins, catalyst and fiberglass reinforcement
5. Mold removal
6. Grinding booth for smoothing surface and cutting of doors and windows
7. Assembly of deck, hull, wood fixtures and upholstery

Site Contact: Dennis Pearson
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4 Permitting History

4.1 New Source Review Permitting for the Facility

Notice of Construction Minor New Source Review

Order of Approval No. 8695 (cancelled) was issued on June 19, 2003, for the installation of a fiberglass boat manufacturing facility consisting of a single building with three rooms (the East Lamination Building). This Order of Approval included synthetic minor emission limits on single HAP, total HAP and Volatile Organic Compounds to keep the facility out of the Title V program. Order of Approval was cancelled and superseded by NOC 11711.

Order of Approval No. 11711 (cancelled) was issued on August 26, 2019 for the addition of the West Lamination Building (one lamination room). The synthetic minor emission limits of Order of Approval 10761 were maintained in this Order of Approval and the conditions from Order of Approval 10761 were pulled into this Order of Approval.

Order of Approval No. 12155 was issued on June 3, 2022 for the removal of the synthetic minor emission limits facility-wide. Upon issuance of this NOC 12155, Fluid Motion became a HAP major source subject to the Title V program. Order of Approval No. 12155 cancelled and superseded Order of Approval 11711.

Prevention of Significant Deterioration (PSD) permit PSD-

The facility is not an existing PSD major source and no PSD permits have been issued at the facility.

4.2 Regulatory Orders Issued to the Facility

No regulatory orders have been issued to the facility.

4.3 Operating Permit Issuance and Renewal

An initial air operating permit application was received by the Agency from the applicant on June 2, 2023, pursuant to WAC 173-401-500(3). The application was determined to be complete on June 8, 2023.

5 Compliance History

Onsite inspections of the facility have occurred annually in 2017-2019 since the issuance of the original synthetic minor Order of Approval. Inspections performed in 2020 and 2021 were conducted via telephone due to the COVID-19 measures to protect agency and Fluid Motion's employees. Onsite inspections resumed in 2022, occurring annually, and the most recent onsite inspection for the facility was completed March 7, 2023.

The facility has received no notices of violation since its establishment as a synthetic minor registered source in 2016.

6 Potential to Emit and Actual Emission Inventories

The facility's potential to emit (PTE) of criteria pollutants and hazardous air pollutants is determined based on maximum boat production in the two lamination buildings, operating at 6,240 hours per year per the enforceable limit of Order of Approval 12155.

Table 1: Annual Potential to Emit[1]

Annual Potential to Emit VOCs and HAP						
Styrene	Methyl methacrylate	n-Hexane	Toluene	Silica	VOC	Total HAPs
(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)	(ton/yr)
58.7	4.32	0.08	0.03	0.0417	--	63.2

The facility is a natural minor for VOC based on the calculated potential to emit. The table below summarizes Fluid Motion's air emissions for the most recent available 5 years which for 2018-2021 occurred prior to the issuance of Order of Approval 12155 and the establishment of Fluid Motion as a HAP major source. Emission inventories are estimates of actual emissions from the facility developed by the permittee and submitted to the Agency annually. Emissions at this facility come from the production of fiberglass boats. Emissions will vary from year to year depending on the facility's total boat production.

Table 2. Emission Inventory Summary (tons per year)

Pollutant	2018	2019	2020	2021	2022
HAP	6.4	5.8	7.4	9.0	39.7
VOC	6.4	5.85	7.4	9.0	39.7

7 Compliance Assurance Monitoring, NESHAP and NSPS Applicability Review

7.1 Compliance Assurance Monitoring

The Compliance Assurance Monitoring (CAM) rule requires owners and operators to monitor the operation and maintenance of their control equipment, so they can evaluate the performance of their control devices and ensure they are working properly. The CAM rule applies at major sources with emission units that have control devices and emissions could exceed 100 tons per year of criteria air pollutant or 10 tons per year single HAP or 25 tons per year total HAP if the control device was not operated. The CAM rule defines a major source using the definition in the Part 70 regulations at 40 CFR 70.2. The three types of major sources in Part 70 are:

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[1] *Notice of Construction Worksheet 12155. Calculation methodology utilized applicant's specifications of material usage for gel coat, polyester resin, vinyl ester resin, radius putty, initiator, spray adhesive, mold release, wood spray and spray adhesive. Styrene emissions utilized the United Emission Factors for Open Molding of Composites July 23, 2001.*

- Major HAP sources – sources that emit 10 tpy or more of a single HAP or 25 tpy or more of all HAPs combined.
- Major air pollutant source – sources that have the potential to emit 100 tpy or more of any air pollutant subject to regulation
- Major source in nonattainment areas – sources with specified potential to emit of certain pollutants in nonattainment areas.

Table 3: CAM Applicability Summary

EU ID and Description	CAM Regulated Pollutant	Pre-Control PTE (tpy)	Post-Control PTE (tpy)	Control Device	Emission Limit(s)	Regulatory Citation	CAM Applies?
EU 1: West Lamination Building (Building 2)	Opacity Particulate Matter	<1	0.0139 TPY	Panel filters with 98% particulate control efficiency	20% opacity for a period or periods aggregating more than 3 minutes in any hour 0.05 gr/dscf from equipment used in manufacturing process Minimum 98% control efficiency filtration system	PSCAA Regulation I 9.03 PSCAA Regulation I 9.09 Order of Approval 12155 #4	No; pre-control PTE below 100 TPY
	Styrene	19.9 TPY	NA	NA	Content limits on organic HAP in resin, gel coat, and adhesives	Order of Approval 12155 #7, #8 40 CFR 63 Subpart VVVV	No; no control device for styrene, MMA or organic HAP Total HAP PTE below 25 TPY
	Methyl Methacrylate (MMA)	1.44 TPY	NA				
	Total HAP	21.3 TPY	NA				
EU 2: East Lamination Building (Building 3)	Opacity Particulate Matter	<1	0.0139 TPY	Panel filters with 98% particulate control efficiency	20% opacity for a period or periods aggregating more than 3 minutes in any hour 0.05 gr/dscf from equipment used in manufacturing process Minimum 98% control efficiency filtration system	PSCAA Regulation I 9.03 PSCAA Regulation I 9.09 Order of Approval 12155 #4	No; pre-control PTE below 100 TPY
	Styrene	39.7 TPY	NA	NA	Content limits on organic HAP in resin, gel coat, and adhesives	Order of Approval 12155 #7, #8 40 CFR 63 Subpart VVVV	No; no control device for styrene, MMA or organic HAP
	Methyl Methacrylate (MMA)	2.88 TPY	NA	NA			
	Total HAP	42.7	NA	NA			

		TPY					

Emission Units 1 and 2 are both equipped with only particulate matter/opacity control devices in the form of panel filters on the lamination room exhaust. The panel filters are required per Order of Approval 12155 to achieve at least 98% control of particulate. As pre-control emissions of PM are below the major source thresholds, CAM does not apply for PM or opacity for neither EU-1 nor EU-2. The potential emissions of styrene at Emission Unit 1 are above the 10 TPY single HAP major threshold, however there are no control devices for styrene nor organic HAP on Emission Unit 1 and CAM does not apply for styrene on Emission Unit 1. Likewise, there are no control devices for styrene or total HAP on Emission Unit 2 such that, while potential emissions of styrene (single HAP) and total HAP are above major source thresholds on Emission Unit 2, CAM does not apply for styrene nor organic HAP on Emission Unit 2.

7.2 NESHAP: National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing

The facility is a boat manufacturing facility building fiberglass boats which is a major source of HAP and meets the applicability criteria of 40 CFR 63.5683(a).

Fluid Motion is classified as an existing source under 40 CFR 63.5692(b) because the facility was not a major source at the time of construction in 2016. Fluid Motion became subject to 40 CFR 63 Subpart VVVV upon issuance of Order of Approval 12155 on June 3, 2022 and was required to comply with the subpart by June 3, 2023 as specified in 40 CFR 63.5695 Table 1 #2, requiring an existing or new area source that becomes a major source after August 22, 2001 to comply with the NESHAP within 1 year after becoming a major source.

The affected source includes all the open molding resin and gel coat operations at the facility in both Emission Unit 1 and Emission Unit 2, any closed molding resin operations, all resin and gel coat mixing, equipment cleaning and carpet and fabric adhesive operations.

7.3 NSPS Applicability

As part of the application process, the Agency reviewed federal New Source Performance Standards (NSPS) that might apply to this facility to determine applicability. No NSPS apply.

8 Applicable Requirements

8.1 Emission Unit Summary Table

An emission unit summary table is included in this permit before Section 1. This table gives a general description of the emission units at the facility. The table is reproduced below and lists the emission units regulated under this permit located at the facility. The information in the table is for informational purposes only.

Source	Description	Install Date	Rated Capacity

Emission Unit No. 1 West Lamination Building	Four fiberglass boat fabrication rooms with wall panel filters	2019	10,000 cfm exhaust per fabrication room
Emission Unit No. 2 East Lamination Building	Fiberglas boat fabrication rooms with eight filter banks and four stack exits	2014	26,600 cfm exhaust per stack exit

8.2 Requirement Tables and Compliance Methods

Section 1 of the AOP includes all facility-wide requirements and is structured so that applicable emission limits are found in Table 1, followed by Compliance Methods associated with the limits. Many of the 40 CFR 63 Subpart VVVV emission limits effectively apply facility-wide (the affected portions of the facility encompass both emission unit lamination buildings) and are included in Table 2 of Section 1, with the compliance methods specific to 40 CFR 63 Subpart VVVV following Table 2. Compliance methods listed in the applicable requirements table are permit conditions listed below the tables. The compliance methods include monitoring, recordkeeping, and reporting obligations specific to the requirement that will be used by the permittee in determining if they are in continuous or intermittent compliance. In some cases where the applicable requirement has little or no ongoing monitoring requirements, monitoring has been added. This is called "gapfilling" and is authorized under WAC 173-401-615(1)(b).

Whenever the Puget Sound Clean Air Agency uses a "gap-filling" monitoring method, we determine the monitoring frequency using criteria contained in EPA's April 30, 1999 Draft *Periodic Monitoring Technical Reference Document*. We consider "the five criteria" in determining how often the facility should perform a monitoring activity: hourly, once per shift, daily, weekly, monthly, quarterly, annually, or once per five-year permitting period. The five criteria are initial compliance, margin of compliance (monitoring method designed so source will identify potential problems early and take action before a violation occurs), variability of process and emissions, environmental impacts of problems, and other technical considerations.

9 Facility-wide Emission Limits and Requirements

9.1 Section 1.A General Facility-Wide Emission Limits

9.1.1 RACT Requirements

PSCAA Regulation I, Section 3.04 establishes reasonably available control technology (RACT) requirements. There is no monitoring required. Condition 6.22 of the permit specifies that in accordance with WAC 173-401-605(3), emission standards and other requirements contained in rules or regulatory orders in effect at the time of this operating permit renewal shall be considered RACT for purposes of permit renewal.

9.1.2 PSCAA Regulation I Article 9 & WAC 173-400-040 Emission Standards

The facility-wide emission limits include emission standards from PSCAA Regulation I Article 9 for opacity and particulate matter. The fiberglass boat manufacturing activities at the facility are not expected to result in visible emissions or particulate emissions in excess of the standard grain loading as the spray area in both lamination buildings are equipped with dry filters with at least 98% particulate removal efficiency for overspray. Under Notice of Construction Order of Approval 12155, both booths are required to check filter installation and pressure drop once per operating

day (Condition 2.6 and 2.15 of the permit), therefore a quarterly check for visible emission is selected as the monitoring method for both the opacity and particulate matter standards.

Quarterly facility-wide inspections and complaint response are selected as the monitoring method for PSCAA Regulation I Article 9 and WAC 173-400-040 precautions to prevent release of fugitive dust emissions, the nuisance standard of PSCAA Regulation I 9.11 and WAC 173-400-040, the fallout standard of WAC 173-400-040, and the PSCAA Regulation 9.20 requirement for maintenance of equipment. The facility is also required to conduct weekly odor monitoring outside each lamination building per Notice of Construction Order of Approval 12155.

9.1.3 PSCAA Regulation II 3.08 Polyester, Vinylester, Gelcoat, and Resin Operations

Fluid Motion meets the applicability of PSCAA Regulation II 3.08 as specified in PSCAA Reg II 3.08(a) because it is a manufacturing operation involving the use of gelcoat and resin in which the styrene monomer is a reactive monomer. Regulation II 3.08 includes requirements for the application areas and emission controls for applying resins and gelcoats, the exhaust stack for those application areas, allowable application equipment, cleaning and material storage requirements. These standards (Reg II 3.08(b)-(f)) are Conditions 1.11-1.14. Compliance methods for these requirements consist of facility-wide inspections once per calendar quarter. Compliance methods for closed container storage of VOC/HAP material and use of dry filtration are also addressed under PSCAA Notice of Construction Order of Approval 12155's weekly inspections of HAP/VOC material storage (Condition 1.25) and filter checks on operating days for each lamination building's spray areas (Conditions 2.6 and 2.15).

9.1.4 PSCAA Notice of Construction Order of Approval 12155 Conditions

Several conditions from the Notice of Construction Order of Approval 12155 covering both lamination buildings apply facility-wide and are included as Conditions 1.15-1.22 of the permit. The compliance methods for gel coat and resin organic HAP content limits, adhesive organic HAP content limits, cleaning solvent organic HAP content and limit on quantity total clear coat applied are adapted directly from Notice of Construction Order of Approval 12155 as Conditions 1.27 and 1.28 of this permit. The compliance method for the operating hour limit is adapted from Order of Approval 12155 with gapfilling for clarification of the timeline for calculation of the 12-month rolling total of operating hours to be completed within 30 days of the end of each month in Condition 1.29 of this permit. Likewise, the compliance demonstration for requirements pertaining to application equipment specifies that the facility maintain a list of the application equipment used for gel coat, tooling resin and adhesives used at the facility (Condition 1.30 of this permit).

9.2 Section 1.B 40 CFR 63 Subpart VVVV Facility-wide Emission Limits

Table 2 includes the applicable portions of 40 CFR 63 Subpart VVVV. As discussed in Section 7.3 of the Statement of Basis, Fluid Motion is categorized as a boat manufacturing facility that builds fiberglass boats and is a major source of HAP under §63.5683. §63.5680 and §63.5683 do not have ongoing requirements and are not included in Table 2 of the permit. §63.5686 is not included as the facility has demonstrated that it is a major source of HAP. §63.5689 specifies which portions of the facility are covered by the subpart. For Fluid Motion, this consists of open molding resin and gel coat operations, resin and gel coating mixing operations, resin and gel coat application and equipment cleaning operations. Fluid Motion does not conduct closed molding resin operations or aluminum hull and deck coating operations. §63.5689 is not included in Table 2 as there are no ongoing requirements associated with that section. Likewise, the identification of Fluid Motion as an existing source per §63.5692(b) because it was not a major source upon

construction and the compliance dates of §63.5695 and Table 1 of 40 CFR 63 Subpart VVVV are not included as there are not ongoing requirements for these sections.

The emission limits for open molding resin and gel coat operations of §63.5698 are listed in Table 2 Condition 1.36 of the permit. The compliance methods are listed in Condition 1.41 of the permit and break out the two different compliance options that Fluid Motion may utilize to comply with organic HAP limits: Maximum achievable control technology (MACT) model point value averaging, or Compliant materials option, as noted in §63.5701. As Fluid Motion does not have an add-on control device for meeting the limits of §63.5698, the portions of 40 CFR 63 Subpart VVVV pertaining to add-on control device compliance demonstration are excluded from the permit. Likewise, the aluminum recreational boat provisions of 40 CFR 63 Subpart VVVV are excluded from the permit because Fluid Motion only fabricates fiberglass boats.

Condition 1.41 includes the general requirements for complying with the open molding emission limit §63.5704(a) and (b). Condition 1.41(a) includes the requirements for an implementation plan in the case of using MACT model point value emission averaging for compliance as specified in §63.5707, as well as the steps for demonstrating compliance using emissions averaging in §63.5710. Condition 1.41(b) includes Table 2 of 40 CFR 63 Subpart VVVV with the organic HAP limits for compliant materials, the steps for determining compliance using compliant materials as specified in §63.5713. The compliance demonstration for filled resins specified in §63.5714 applies to both emission averaging and compliant materials options for compliance and is included in Condition 1.41. Condition 1.41 also includes the procedure for determining the organic HAP content of materials specified in §63.5758(a) as part of the overall method for determining compliance with either emission averaging or compliant materials options.

Condition 1.37 of the permit contains the standards for resin and gel coat mixing of §63.5731(a) and the exemption of §63.5731(b), with compliance demonstration in Conditions 1.42 and 1.43 of the permit following the requirements of §63.5731(c) and (d).

Condition 1.38 and 1.39 of the permit contains the standards for resin and gel coat application equipment cleaning operations specified in §63.5734(a) and (b) and Condition 1.44 contains the compliance demonstration as specified in §63.5737.

Condition 1.40 of the permit contains the standards for carpet and fabric adhesive operations of §63.5740(a) and Condition 1.45 specifies the compliance demonstration of §63.5740(b).

The compliance notification required in §63.5761(a) and Table 7 and outlined in 40 CFR 63.9(b)(3)-(5) was met through Fluid Motion's submission of a Notice of Completion following issuance of Notice of Construction Order of Approval 12155, received by PSCAA on July 2, 2022 per 40 CFR 63.9(a)(3). This section of 40 CFR 63 Subpart VVVV is not included in the permit because there is no ongoing requirement.

The ongoing semiannual reporting requirements for 40 CFR 63 Subpart VVVV specified in §63.5764, the mechanisms for submitting reports of §63.5764 and §63.5765 is included in Section 5 of the permit along with other reporting requirements.

The recordkeeping requirements for 40 CFR 63 Subpart VVVV specified in §63.5767 and 63.5770 are included in Section 6 of the permit. (General Recordkeeping Requirements)

Table 8 General Provisions:

> The portions of the general provisions pertaining to use of CMS, source testing, monitoring of control device are not included because the facility does not utilize a control device or a CMS. General applicability, state authority and delegations, definitions, addresses, incorporation by reference, and availability of information/confidentiality are not included as those provisions do not contain ongoing compliance requirements.

The notification of compliance status specified in §63.9(h) for after the Title V permit has been issued is included in Section 5 of the permit along with other reporting requirements.

10 Emission Unit Specific Applicable Requirements

10.1 Section 2.A West Lamination Building

Table 3 outlines the applicable emission standards for specifically the west lamination building. These emission unit specific requirements are from Order of Approval 12155 and pertain to specific spray rooms requirements and inspections (requirements 2.2 and 2.3) and specific operational limitations (requirements 2.4 and 2.5). The compliance method for the filter equipment and the pressure drop across the filters are specified in conditions 2.6 -2.8 of the permit. The inspections specified in conditions 2.6 – 2.8 are from Order of Approval 12155. The production limitations are also from Order of Approval 12155 and the compliance method for those requirements are the West Lamination Building Production Tracking limits of conditions 2.9 and 2.10. Conditions 2.9 and 2.10 are adapted from Order of Approval 12155 with gapfilling to specify that records of production and personnel documentation are to be kept contemporaneously.

10.2 Section 2.B East Lamination Building

Table 4 outlines the applicable emission standards for specifically the east lamination building. These emission unit specific requirements are from Order of Approval 12155 and pertain to specific spray rooms requirements and inspections (requirements 2.12 and 2.13) and specific operational limitations (requirements 2.14 and 2.15). The compliance method for the filter equipment and the pressure drop across the filters are specified in conditions 2.16-2.18 of the permit. The compliance methods of inspections are from Order of Approval 12155. The production limitations are also from Order of Approval 12155 and the compliance method for those requirements are the East Lamination Building Production Tracking limits of conditions 2.19 and 2.20. Conditions 2.19 and 2.20 are adapted from Order of Approval 12155 with gapfilling to specify that records of production and personnel documentation are to be kept contemporaneously.

11 Standard Terms and Conditions

Some of the requirements that are more general in nature are included in Section 3, Standard Terms and Conditions. This section also contains the standard terms and conditions specifically listed in WAC 173-401-620.

12 General Permitting Requirements

Section 4 of the permit includes the requirements for renewing, revoking, reopening, amending, and modifying the operating permit. It also includes the new source review requirements, both minor NSR and Prevention of Significant Deterioration requirements.

13 General Compliance Requirements

General compliance requirements are included in Section 5 of the permit. These include certification and reporting requirements, requirements associated with inspections and investigations, and compliance testing requirements. Actions required for excess emissions are also included in this section. Finally, this section provides a table summarizing the effective date of the regulations in the permit at the time of permit issuance. Regulations that are approved into the Washington State Implementation Plan (SIP) are federally enforceable. In some cases, there are two versions of the regulation because the newer version has not been adopted into the SIP. In this case, the older version of the regulation would be federally enforceable, and the

current rule would only be enforceable by the Agency (or State). The SIP is updated on a somewhat regular basis and what is contained in the SIP can change over time.

The 40 CFR 63 Subpart VVVV specific reporting requirements are also included in this section alongside the compliance certifications originating from PSCAA Regulation I Article 7 and WAC 173-401-630.

14 Generally Applicable Requirements

Some of the requirements that are generally applicable are included in Section 6 of the permit. This includes record retention, asbestos requirements, open burning requirements, stratospheric ozone and climate protection requirements, chemical accident prevention provisions in 40 CFR Part 68, concealment and masking, tampering, RACT requirements, annual emission reporting requirements, greenhouse gas reporting requirements and non-road engine notification requirements.

The 40 CFR 63 Subpart VVVV specific recordkeeping and record retention requirements are included in Section 6 of the permit.

15 Test Methods and Averaging Periods

Section 7 of the permit includes a summary of the test methods and averaging periods to be used for compliance determination unless otherwise specified in the rules or approval conditions of the permit.

16 Inapplicable Requirements

The requirements identified in Section 8 of the air operating permit do not apply to the facility, or to the specific emissions units identified in the permit. The permit shield applies to all requirements so identified.

17 Insignificant Emission Units and Activities

Section 9 of the permit addresses insignificant emission units and activities. In accordance with WAC 173-401-530(1), determination of an emission unit or activity as insignificant does not exempt the unit or activity from any applicable requirement.

An emission unit or activity is insignificant based on one or more of the criteria identified in WAC 173-401-530. This includes categorical exemption, exemption based on emissions being below emission thresholds in WAC 173-401-530(4), or exemption based on size or production rate. Activities that generate only fugitive emissions which are subject to no applicable requirement other than generally applicable requirements can also be classified as insignificant. Categorically exempt units or activities do not need to be listed in the permit application, but all others do. Fluid Motion has identified these to be the units listed in Table 9 of this permit.

18 Public Comments and Responses During Initial Drafting

The draft Air Operating Permit, Statement of Basis and supporting documentation were open for public comment from February 27, 2024 through March 29, 2024. No comments were received.

19 EPA Comment Period

The proposed AOP and Statement of Basis was submitted to EPA April 17, 2024 and ended on June 1, 2024. No comments were received from EPA on the proposed permit.

PUGET SOUND
Clean Air Agency

Puget Sound Clean Air Agency

Notice of Construction No. 12155

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

Registration No. 29632

Date JUN 0 3 2022

Fiberglass boat manufacturing: west lamination building (Building 2) housing four 10,000 cfm exhaust stacks to vent one spray room equipped with wall panel filters with 98% removal efficiency, and east lamination building (Building 3) with three rooms for fiberglass boat manufacturing equipment with eight panel filters with combined capacity of 106,400 cfm.

OWNER

Fluid Motion LLC
17939 59th Ave NE Bldg #4
Arlington, WA 98223

INSTALLATION ADDRESS

Fluid Motion LLC
17939 59th Ave NE Bldg #4
Arlington, WA 98223

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.
3. 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.
4. The fiberglass manufacturing spray rooms in both Buildings 2 and 3 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 spraying rooms in both the East Lamination Building and West Lamination Building 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. The lamination activities in Buildings 2 and 3 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 in Building 2 must less than 32 feet. Compliance with the limitation on the boat length may be demonstrated through production data.
    c. Boats fabricated in Building 3 must not exceed 45 feet. Compliance with this limitation may be demonstrated through production data.
    d. Building 2 must not exceed 16 lamination workers per 8-hour shift. Compliance with this limitation may be demonstrated through employee schedules or other personnel documentation.
    e. Building 3 must not exceed 30 lamination workers per 8-hour shift. Compliance with this limitation

may be demonstrated through employee schedules or other personnel documentation.

7. 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 materials used.

Operation	Application Method	Total Organic HAP limit (% weight)
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%

8. 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.

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

9. 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.

10. The owner or operator shall use only nonatomizing methods for production and tooling resin application.

11. 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.

12. 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;

c. Confirmation of closed containers; and
d. The description of corrective action taken, if any.

13. 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.

14. If requirements as described by Condition #13 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 #13 are met.

15. The owner or operator shall keep the Condition #13 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.

16. 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.

17. 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.

18. 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.

19. 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:
    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.

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 Building 2 and Building 3 as specified in Condition #4;
b. Documentation of the amount of clear gel coat applied to each boat as specified in Condition 9;
c. Documentation of transfer efficiency of any atomizing spray guns used for gel coat application as specified in Condition #11;
d. Safety data sheets demonstrating compliance with the organic HAP limits specified in Conditions #7 and #8 and with the cleaning solvent requirements specified in Condition #16;
e. Results of inspections to determine compliance with HAP containment as required by Condition #12 and of inspections to determine compliance with the dry filter system as required by Condition #13 and of inspections to determine compliance with the odor monitoring as required by Condition #19; and
f. Product data and personnel data for Building 2 and Building 3 and documentation of facility-wide operating hours as required by Condition #6.

21. Upon issuance of this order, 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.

22. Upon issuance of this order, WAC 173-401 applies to this facility. The facility must file a complete application for a chapter 401 permit within twelve months of issuance of this order, according to the requirements of WAC 173-401.

23. Upon issuance, this order NOC 12155 shall cancel and supersede NOC 11711.

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.

for

Maggie Corbin
Reviewing Engineer

John Dawson, PE
Engineering Manager