northwest Clean Air agency

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Northwest Clean Air Agency (NWCAA) hereby issues Order of Approval to Construct (OAC) #1081

Project Summary: Install a new automotive spray booth in Building 18 as a replacement to an existing booth being demolished with Building 49.

Approved Emission Unit:

- Automotive spray booth (BTH-0018-01); dimensions 32′ x 16′ x 16′ with 48 20″ x 20″ filters, and an exhaust fan sized for 25,600 cfm.

APPLICANT

Naval Air Station, Whidbey Island
1115 West Lexington
Oak Harbor, WA 98278-3500

NOC Contact: Keith Kuenzi

OWNER

NASWI Seaplane Base
1115 W. Lexington Bld. 103
Oak Harbor, WA 98278

FACILITY LOCATION:

Building 18, Coral Sea Avenue, Oak Harbor, WA 98278

As authorized by Northwest Clean Air Agency Regulation Section 300, this order is issued subject to the following restrictions and conditions:

1. Odors from the facility shall not result in a nuisance as determined by NWCAA staff at or beyond the property boundary.
2. All painters must be certified that they have completed training in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment per training requirements no less stringent than those set forth for a new source in Subpart HHHHHH of 40 CFR part 63 (Subpart HHHHHH). The spray application of surface coatings is prohibited by persons who are not certified as having completed the required training.
3. All spray-applied coatings must be applied in the spray booth. The spray booth must:
    a. be ventilated at negative pressure so that paint overspray is drawn into filtration systems that are certified to comply with standards no less stringent than the 98% capture efficiency requirement in Subpart HHHHHH;
    b. be fully enclosed with a full roof and four complete walls; and
    c. be clearly labeled with permanent signage as "BTH-0018-01".

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4. Spray booth exhaust shall leave the building via an unobstructed vertical stack extending to no less than six feet above the roof line.
5. Spray booth exhaust fans shall be operated during coating activities in the booth.
6. Compliance with the filter capture efficiency requirement in Condition 3 shall be certified by published data provided by filter vendors showing that filters have passed the test procedures no less stringent than those required in Subpart HHHHHH. This data shall be maintained at the facility for each type of exhaust filter used at the facility.
7. Exhaust filters used to comply with Condition 3 shall be properly seated with no visible gaps between the filter and the filter mounting surface.
8. A differential pressure indicator shall be installed across the exhaust filter system of the spray booth. The gauge shall indicate the differential pressure across the filter media.
    a. The acceptable differential pressure range for each filter media type as established by the manufacturer or through engineering judgment shall be written on or nearby the gauge.
    b. Once per operating day, the gauge shall be checked to ensure that the filter systems are operating within the acceptable differential pressure range and the pressure differential noted in the log as described in Condition 17.e.
    c. If a filter system is not operating within the acceptable differential pressure range, the spray booth shall be shut down immediately until the problem has been identified and corrected.
9. The spray booth and spray guns shall be operated and maintained in accordance with the manufacturer's specifications. Operation and maintenance (O&M) manuals for spray coating and air pollution control equipment (spray guns, booth, filters, and exhaust fan) shall be available to operators at all times and provided to the NWCAA upon request.
10. Chlorinated organic solvents (such as methylene chloride) shall not be used or stored onsite without prior written approval from the NWCAA. Any request for chlorinated organic solvent use shall include a demonstration that no satisfactory alternative exists.
11. Coatings containing Chromium VI shall not be used or stored onsite.
12. All spray-applied coatings must be applied with a high-volume, low-pressure (HVLP) spray gun, electrostatic application, or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve a transfer efficiency comparable to HVLP technology for a comparable operation, and for which written approval has been obtained from the NWCAA.
13. Spray gun cleaning shall be done so that an atomized mist or spray of gun cleaning solvent and coating residue is not created outside of a container that collects used gun cleaning solvent. Spray gun cleaning may be done, for example, by hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. Cleaning solvents shall be returned to closed containers after use.
14. Except during use, all volatile materials such as paints, primers, reducers, curing agents, and solvents shall be kept in closed containers at all times. Volatile waste

materials (including used wet, coating-laden cloth, paper, or any other absorbent applicators) shall be placed in designated containers that are kept closed at all times except when depositing or removing these materials from the container.

15. NASWI Seaplane Base shall notify NWCAA if solvent or spray-applied coating usage deviates from the usage profile submitted with Notice of Construction applications fourteen (14) days prior to usage change.

16. NASWI Seaplane Base shall use no more coatings or solvents during any consecutive 12-month period than is listed in the following table.

Coating	Usage (gallon/consecutive 12-month period)
Primers and fillers	144
Topcoatings	144
Solvents	24
Additives	60

17. NASWI Seaplane Base shall maintain:

    a. Certification of painter training pursuant to Condition 2;

    b. Filter system efficiency documentation pursuant to Condition 3 & 6;Spray gun transfer efficiency documentation pursuant to Condition 12;

    c. Materials safety data sheets (MSDSs) for solvents and coatings;

    d. A record of the total gallons of coatings and solvents used, updated monthly for the previous consecutive 12-month period; and

    e. A spray booth logbook containing records of all inspections, pressure differential readings, routine maintenance, and corrective actions required in this Order, with each record to include the date and time of the inspection, a brief description of any routine maintenance or corrective action taken, and the name of the person conducting the inspection.

    All of the above records shall be maintained for at least five years after generation. Copies of records shall be kept onsite in a printed or electronic form for at least the first two years after generation, and may be kept off-site thereafter. All records shall be readily available for inspection upon request by the NWCAA.

18. A copy of this Order shall be maintained onsite and shall be readily available to facility personnel and, upon request, to the NWCAA.

19. The owner/operator shall notify the NWCAA in writing of the initial startup date of the permitted equipment. The notice shall include a reference to OAC 1081 and shall be postmarked no later than 15 days after the initial startup date.

Alan T. Butler, P.E.
Permit Engineer

Mark Buford, P.E.
Assistant Director