NORTHWEST
AIR POLLUTION AUTHORITY
Representing Island, Skagit & Whatcom Counties

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Original Issuance: March 8, 2001

Revisions: January 30, 2004

Northwest Air Pollution Authority (NWAPA) hereby issues
Order of Approval to Construct (OAC) #755a

Project Summary: The Naval Air Station, Whidbey Island AIMD Support Equipment P2 Powder Coating and Blast Facility project includes installation of an abrasive media blast booth (RBL-PP995-01), an electrostatic powder coating spray booth (BTH-PP995-01), a curing oven (FRN-PP995-01), and a controlled pyrolysis cleaning furnace (FRN-PP995-02). The equipment will be used to paint facility equipment that includes both materials subject to the Aerospace NESHAP and materials exempt from the NESHAP.

APPLICANT	OWNER
Kathryn A. Souders Environmental Director Naval Air Station, Whidbey Island 1155 W. Lexington Street (Bldg 113) Oak Harbor, WA 98278-3800 NWAPA ID# 006-V-S	United States Navy

FACILITY LOCATION:

Ault Field, Oak Harbor, WA

Note that in addition to other applicable rules and regulations, this project is subject to applicable portions of the following federal regulations:

National Emission Standards for Hazardous Air Pollutants / Maximum Achievable Control Technology Standards

- Subpart A – General Provisions
- 40 CFR Part 63 Subpart GG – National Emission Standards for Aerospace Manufacturing and Rework Facilities.

Best Available Control Technology for the project has been determined to be:

- For the blast booth, complete enclosure of blasting operation and the use of a cartridge filter dust collector.
- For the paint booth, paint arrest exhaust filters and electrostatic powder coating application.
- For the curing oven, natural gas combustion in the oven.
- For the pyrolysis furnace, an afterburner control system.

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

1. For painting components subject to the Aerospace NESHAP, primers shall contain organic Hazardous Air Pollutants (HAPs) = 350 g/l (2.9 lb/gal), less water, as applied and Volatile Organic Compounds (VOCs) =350 g/l (2.9 lb/gal) less water and exempt solvents. Topcoats shall contain organic HAPs = 420 g/l (3.5 lb/gal), less water, as applied and VOCs =420 g/l (3.5 lb/gal) less water and exempt solvents as applied. Specialty coatings are exempt from this requirement.
2. For painting components subject to the Aerospace NESHAP, the application equipment used to apply primers or topcoats shall be operated according to facility procedures, and/or the manufacturer's specifications, whichever is most stringent, at all times.
3. Primers and topcoats to or from containers, tanks, vats, vessels, and piping systems shall be handled to minimize spills.
4. Primers and topcoats containing inorganic Hazardous Air Pollutants (HAPs) in quantities covered by the Aerospace NESHAP may not be applied to components subject to the Aerospace NESHAP in the paint booth. Records of the composition of primers and topcoats used in the paint booth shall be kept and made available to NWAPA upon request.
5. The blast booth may only be used to depaint components not subject to the Aerospace NESHAP or parts, subassemblies, and assemblies normally removed from the aerospace vehicle for depainting. Wings and stabilizers may not be depainted in the blast booth.
6. To monitor compliance with Conditions 1, 2, 4, and 5, a log shall be maintained containing the work order number, an item description, and the task identification number for each component and all equipment depainted in the blast booth or painted in the paint booth.
7. Coating and abrasive blasting shall only occur inside the fully enclosed booths.
8. Fine particulate (PM_{10}) emissions from the dust collection system shall not exceed 0.01 grains/dscf. The dust collection system shall be operating whenever the abrasive media blasting system is in use.
9. A differential pressure gauge shall be maintained on the blast booth's dust collector to determine static pressure drop across the filter elements. The dust collector pulse cleaning system pressure switch/gauge control system will be interlocked to prevent blasting activity when filter maintenance is required. The differential pressure drop shall be maintained as per manufacturer's recommendations and recorded each day of operation. Maintenance performed on the equipment shall be recorded for each maintenance activity.
10. No visible emissions from the blast booth shall be allowed. The blast booth exhaust will be observed for visual emissions once per month during the months the booth is operated.
11. The curing oven and pyrolysis furnace shall combust only natural gas.
12. The pyrolysis furnace's afterburners will maintain a minimum temperature of 1400 °F. The main furnace burners shall be interlocked with the afterburner system so that the burners will not ignite until the temperature in the thermal oxidation chamber is at a minimum of 1400 °F.
13. Procedures shall be maintained at the facility, available to NWAPA inspectors, instructing operators of which components prepared and painted in the booths are subject to the Aerospace NESHAP and which primers and topcoats may be used to paint those components.
14. Maintenance and operation manuals shall be available at all times to the equipment operators. The equipment shall be operated and maintained in accordance with the manufacturer's specifications.

Anne Naismith, PE Permitting Engineer	Lynn Billington, PE Reviewing Engineer	James Randles Director

1) Revision a, January 30, 2004:
   a) Reformatted OAC to new format.
   b) Removed limitation to prepare and paint Ground Support Equipment only.
   c) Added Aerospace NESHAP requirements.
   d) Added Condition 6 to identify Aerospace NESHAP components and the coatings used on these components.