northwest Clean Air agency

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Northwest Clean Air Agency (NWCAA) hereby issues Order of Approval to Construct (OAC) 1131

Project Summary: Retrofit of existing paint booth BTH-2818-01 with NESHAP Subpart GG compliant filtration system. This project is a substantial upgrade to the emissions controls at an existing stationary source per Section 300.13 of the NWCAA Regulation.

Approved Emission Units:

- One (1) spray booth with a 40 CFR 63 Subpart GG-compliant three-stage exhaust filtration system and a 13,000 cfm fan.

APPLICANT

Naval Air Station Whidbey Island (NASWI)
1115 W. Lexington Street, B103
Oak Harbor, WA 98278

NOC Contact: Dina Torgerson,
(360) 257-5742

OWNER

Naval Air Station Whidbey Island (NASWI)
1115 W. Lexington Street, B103
Oak Harbor, WA 98278

FACILITY LOCATION:

3485 N. Langley Blvd Oak Harbor, WA 98278

In addition to other applicable rules and regulations, this emission unit is subject to applicable portions of the following federal regulations:

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

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

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As authorized by Northwest Clean Air Agency Regulation Section 300, this order is issued subject to the following restrictions and conditions[1]:

1. Odors from the facility shall not result in a nuisance at or beyond the property boundary as determined by NWCAA staff.

2. The filtration system and fan shall be installed and maintained in accordance with manufacturer recommendations.

3. Paint particulate matter and volatiles shall be exhausted from the spray booth through a filtration system certified to meet or exceed the requirements of 40 CFR 63.745(g)(2)(ii)(A). A copy of this certification shall be maintained on site. The filters shall be seated with no visible gaps during booth operation. The spray booth exhaust fan shall be operated during all coating activities in the booth.

4. A differential pressure gauge shall be installed and maintained across each of the three filter banks to measure the pressure differential. The acceptable pressure differential ranges shall be established based on filter manufacturer recommendations and shall be recorded on or nearby the gauges or on the pressure differential record.

5. Pressure differential across each bank of the filtration system shall be recorded at least once each shift while the exhaust fan is operating. Each record entry shall contain the time and date of the check, the pressure differential, and the initials of the person performing the check. If the pressure differential is not within the acceptable range, the spray booth shall be shut down immediately and operation shall not resume until the problem has been identified and corrected.

6. If differential pressure gauges other than inclined manometers are used (e.g., magnehelic gauges), their calibration must be checked at least once per quarter. To check the calibration of a differential pressure gauge, compare Δp readings of the gauge with those of a gauge-oil manometer at a minimum of three points, approximately representing the range of Δp values across the filter. If, at each point, the values of Δp as read by the differential pressure gauge and gauge-oil manometer agree to within 5 percent, the differential pressure gauge shall be considered to be in proper calibration. Otherwise, corrective action, such as calibration or replacement of the differential pressure gauge, shall be taken. The date of the accuracy test, as well as the accuracy measurements before and after any adjustments, shall be recorded.

7. Spray gun cleaning shall be performed 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.

[1] Nothing in this permit is intended to, or shall, alter or waive any applicable law [including but not limited to defenses, entitlements, challenges or clarifications related to the Credible Evidence Rule , 62. Fed. Reg. 8315 (Feb. 27, 1997)] concerning the use of data for any purpose under the Act, generated by the reference method specified herein or otherwise.

8. Records of all inspections and corrective actions required in this Order shall be taken and maintained in accordance with 40 CFR 63.10(b)(1).

9. NWCAA shall be provided written notification of the startup date of the retrofitted spray booth. The notice shall be postmarked no later than 15 days after spray coating activities resume in the booth and shall include a reference to OAC 1131.

Alan T. Butler, P.E.
Engineer

Mark Buford, P.E.
Assistant Director