# **Bay Area Air Quality Management District**

375 Beale Street, Suite 600 San Francisco, CA 94105 (415) 771-6000

# Final

# **MAJOR FACILITY REVIEW PERMIT**

**Issued To:** 

# Puglia Engineering, Inc. San Francisco Shipyard Facility #A3288

Facility Address: Foot of 20th Street San Francisco, CA 94107

Mailing Address: PO Box 7644 San Francisco, CA 94120

Responsible Official Hugh Vanderspek, General Manager (415) 861-7447 x200 Facility Contact Ken Peterson (415) 829-0450

Type of Facility: Primary SIC: Product: Ship Repair Facility 3731 Ship Repair BAAQMD Engineering Division Contact: Tamiko Endow

### ISSUED BY THE BAY AREA AIR QUALITY MANAGEMENT DISTRICT

Signed by Damian Breen for Jack P. Broadbent Jack P. Broadbent, Executive Officer/Air Pollution Control Officer February 24, 2017 Date

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# I. STANDARD CONDITIONS

#### A. Administrative Requirements

The permit holder shall comply with all applicable requirements in the following regulations:

BAAQMD Regulation 1 - General Provisions and Definitions

(as amended by the District Board on 5/4/11);

SIP Regulation 1 - General Provisions and Definitions

(as approved by EPA through 6/28/99);

BAAQMD Regulation 2, Rule 1 - Permits, General Requirements

(as amended by the District Board on 12/19/12, effective 8/31/16); BAAQMD Regulation 2, Rule 2 - Permits, New Source Review

(as amended by the District Board on 12/19/12, effective 8/31/16); BAAQMD Regulation 2, Rule 4 - Permits, Emissions Banking

(as amended by the District Board on 12/19/12); SIP Regulation 2, Rule 4 - Permits, Emissions Banking

(as approved by EPA through 1/26/99)

BAAQMD Regulation 2, Rule 5 – New Source Review of Toxic Air Contaminants

(as amended by the District Board on 12/7/16);

BAAQMD Regulation 2, Rule 6 - Permits, Major Facility Review

(as amended by the District Board on 4/16/03); and SIP Regulation 2, Rule 6 – Permits Major Facility Review

(as approved by EPA through 6/23/95)

### B. Conditions to Implement Regulation 2, Rule 6, Major Facility Review

- This Major Facility Review Permit was issued on February 24, 2017, and expires on February 23, 2022. The permit holder shall submit a complete application for renewal of this Major Facility Review Permit no later than August 23, 2021, and no earlier than February 23, 2021. If a complete application for renewal has not been submitted in accordance with these deadlines, the facility may not operate after February 23, 2022. If the permit renewal has not been issued by February 23, 2022, but a complete application for renewal has been submitted in accordance with the above deadlines, the existing permit will continue in force until the District takes final action on the renewal application. (Regulation 2-6-307, 404.2, 407, & 409.6; MOP Volume II, Part 3, §4.2)
- 2. The permit holder shall comply with all conditions of this permit. The permit consists of this document and all appendices. Any non-compliance with the terms and conditions of this permit will constitute a violation of the law and will be grounds for enforcement action; permit termination, revocation and re-issuance, or modification; or denial of a permit renewal application. (Regulation 2-6-307; MOP Volume II, Part 3, §4.11)
- 3. In the event any enforcement action is brought as a result of a violation of any term or condition of this permit, the fact that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with such term or condition shall not be a defense to such enforcement action. (MOP Volume II, Part 3, §4.11)

# I. Standard Conditions

- 4. This permit may be modified, revoked, reopened and reissued, or terminated for cause. (Regulation 2-6-307, 409.8, 415; MOP Volume II, Part 3, §4.11)
- 5. The filing of a request by the facility for a permit modification, revocation and re-issuance, or termination, or the filing of a notification of planned changes or anticipated non-compliance does not stay the applicability of any permit condition. (Regulation 2-6-409.7; MOP Volume II, Part 3, §4.11)
- 6. This permit does not convey any property rights of any sort, nor any exclusive privilege. (Regulation 2-6-409.7; MOP Volume II, Part 3, §4.11)
- 7. The permit holder shall supply within 30 days any information that the District requests in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. (Regulation 1-441, Regulation 2-6-409.4 & 501; MOP Volume II, Part 3, §4.11)
- 8. Any records required to be maintained pursuant to this permit which the permittee considers to be proprietary or trade secret information shall be prominently designated as such. Copies of any such proprietary or trade secret information which are provided to the District shall be maintained by the District in a locked confidential file, provided, however, that requests from the public for the review of any such information shall be handled in accordance with the District's procedures set forth in Section 11 of the District's Administrative Code. (Regulation 2-6-419; MOP Volume II, Part 3, §4.11)
- 9. Proprietary or trade secret information provided to EPA will be subject to the requirements of 40 CFR Part 2, Subpart B Public Information, Confidentiality of Business Information. (40 CFR Part 2)
- 10. The emissions inventory submitted with the application for this Major Facility Review Permit is an estimate of actual emissions or the potential to emit for the time period stated and is included only as one means of determining applicable requirements for emission sources. It does not establish, or constitute a basis for establishing, any new emission limitations. (MOP Volume II, Part 3, §4.11)
- 11. The responsible official shall certify all documents submitted by the facility pursuant to the major facility review permit. The certification shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. The certifications shall be signed by a responsible official for the facility. (Regulation 2-6-409.20, MOP Volume II, Part 3, §4.11)
- 12. The permit holder is responsible for compliance, and certification of compliance, with all conditions of the permit, regardless whether it acts through employees, agents, contractors, or subcontractors. (Regulation 2-6-307)

#### C. Requirement to Pay Fees

The permit holder shall pay annual fees in accordance with District Regulation 3, including Schedule P. (Regulation 2-6-402 & 409.13, Regulation 3; MOP Volume II, Part 3, §4.12)

# I. Standard Conditions

#### **D.** Inspection and Entry

Access to Facility: The permit holder shall provide reasonable access to the facility and equipment that is subject to this permit to the APCO and/or to his or her designee. (Regulation 1-440, Regulation 2-6-409.3; MOP Volume II, Part 3, §4.14)

#### E. Records

- 1. The permit holder must provide any information, records, and reports requested or specified by the APCO. (Regulation 1-441, Regulation 2-6-409.4)
- 2. Notwithstanding the specific wording in any requirement, all records for federally enforceable requirements shall be maintained for at least five years from the date of entry. (Regulation 2-6-501, MOP Volume II, Part 3, §4.7)

### F. Monitoring Reports

Reports of all required monitoring must be submitted to the Bay Area Air Quality Management District at least once every six months, except where an applicable requirement specifies more frequent reporting. Reports shall be for the following periods: December 1<sup>st</sup> through May 31<sup>st</sup> and June 1<sup>st</sup> through November 30<sup>th</sup>, and are due on the last day of the month after the end of the reporting period. All instances of non-compliance shall be clearly identified in these reports. The reports shall be certified by the responsible official as true, accurate, and complete. In addition, all instances of non-compliance with the permit shall be reported in writing to the District's Compliance and Enforcement Division within 10 calendar days of the discovery of the incident. Within 30 calendar days of the discovery of any incident of non-compliance, the facility shall submit a written report including the probable cause of non-compliance and any corrective or preventative actions. The reports shall be sent by e-mail to compliance@baaqmd.gov or by postal mail to the following address:

Director of Compliance and Enforcement Bay Area Air Quality Management District 375 Beale Street, Suite 600 San Francisco, CA 94105 Attn: Title V Reports

(Regulation 2-6-502, MOP Volume II, Part 3, §4.7)

### G. Compliance Certification

Compliance certifications shall be submitted annually by the responsible official of this facility to the Bay Area Air Quality Management District and to the Environmental Protection Agency. The certification period will be June 1st to May 31st. The certification shall be submitted by June 30<sup>th</sup> of each year. The certification must list each applicable requirement, the compliance status, whether compliance was continuous or intermittent, the method used to determine compliance, and any other specific information required by the permit. The certification should be directed to the District's

# I. Standard Conditions

Compliance and Enforcement Division at the address above, and a copy of the certification should be sent by e-mail to r9.aeo@epa.gov mail or by postal mail to the Environmental Protection Agency at the following address:

Director Enforcement Division, TRI & Air Section (ENF-2-1) USEPA Region 9 75 Hawthorne Street San Francisco, California 94105

(MOP Volume II, Part 3, §4.5 and 4.15)

### **H. Emergency Provisions**

- 1. The permit holder may seek relief from enforcement action in the event of a breakdown, as defined by Regulation 1-208 of the District's Rules and Regulations, by following the procedures contained in Regulations 1-431 and 1-432. The District will thereafter determine whether breakdown relief will be granted in accordance with Regulation 1-433. (MOP Volume II, Part 3, §4.8)
- 2. The permit holder may seek relief from enforcement action for a violation of any of the terms and conditions of this permit by applying to the District's Hearing Board for a variance pursuant to Health and Safety Code Section 42350. The Hearing Board will determine after notice and hearing whether variance relief should be granted in accordance with the procedures and standards set forth in Health and Safety Code Section 42350 et seq. (MOP Volume II, Part 3, §4.8)
- 3. The granting by the District of breakdown relief or the issuance by the Hearing Board of a variance will not provide relief from federal enforcement. (MOP Volume II, Part 3, §4.8)

### I. Severability

In the event that any provision of this permit is invalidated by a court or tribunal of competent jurisdiction, or by the Administrator of the EPA, all remaining portions of the permit shall remain in full force and effect. (Regulation 2-6-409.5; MOP Volume II, Part 3, §4.10)

#### J. Miscellaneous Conditions

1. The maximum capacity for each source as shown in Table II-A is the maximum allowable capacity. Exceedance of the maximum allowable capacity for any source is a violation of Regulation 2, Rule 1, Section 301. (Regulation 2-1-301)

# II. EQUIPMENT

### **Table II A - Permitted Sources**

Each of the following sources has been issued a permit to operate pursuant to the requirements of BAAQMD Regulation 2, Permits. The capacities in this table are the maximum allowable capacities for each source, pursuant to Standard Condition I.J and Regulation 2-1-301.

S-#	Description	Make or Type	Model	Capacity
S-1	Paint Spraying /Abrasive	GRACO guns	205457	N/A
	Blasting Operation			
S-2	Sandblasting Operation	Custom	N/A	9 tons/hr
S-10	Paint Spray Booth	Custom	N/A	17,000 cfm
S-12	Polyester Resin Operation	Custom	N/A	200 gal/yr
S-13	Auxiliary Harbor Craft Prime	Caterpillar	D336	320 hp
	Diesel Engine on Dry Dock#2			1.92 MM Btu/hr
S-16	Abrasive Blast Room with	custom	N/A	1,200 lb abrasive/hr-
	Pneumatic Recovery System			nozzle

**Table II B – Abatement Devices** 

		Source(s)	Applicable	Operating	Limit or
<b>A-</b> #	Description	Controlled	Requirement	Parameters	Efficiency
16	Dust Collector	16	Regulation 6-		0.002 gr/dscf
			1-310,		
			SIP Regulation		
			6-310,		
			BAAQMD		
			condition		
			#23507, part 4		

# **III. GENERALLY APPLICABLE REQUIREMENTS**

The permit holder shall comply with all applicable requirements, including those specified in the BAAQMD and SIP Rules and Regulations and other federal requirements cited below. These requirements apply in a general manner to the facility and/or to sources exempt from the requirement to obtain a District Permit to Operate. The District has determined that these requirements would not be violated under normal, routine operations, and that no additional periodic monitoring or reporting to demonstrate compliance is warranted. In cases where a requirement, in addition to being generally applicable, is also specifically applicable to one or more sources, the requirement and the source are also included in Section IV, Source-Specific Applicable Requirements, of this permit. This section also contains provisions that may apply to temporary sources.

The dates in parentheses in the Title column identify the versions of the regulations being cited and are, as applicable:

- 1. BAAQMD regulation(s): The date(s) of adoption or most recent amendment of the regulation by the District Board of Directors
- 2. Any federal requirement, including a version of a District regulation that has been approved into the SIP: The most recent date of EPA approval of any portion of the rule, encompassing all actions on the rule through that date

The full language of SIP requirements is on the EPA Region 9 website. The address is: http://yosemite.epa.gov/r9/r9sips.nsf/Agency?ReadForm&count=500&state=California&cat=Bay+Area+Air+Quality+Management+District-Agency-Wide+Provisions.

### NOTE:

There are differences between the current BAAQMD rule and the version of the rule in the SIP. All sources must comply with <u>both</u> versions of the rule until US EPA has reviewed and approved the District's revision of the regulation.

		Federally
Applicable	Regulation Title or	Enforceable
Requirement	Description of Requirement	(Y/N)
BAAQMD Regulation 1	General Provisions and Definitions (5/4/11)	Ν
SIP Regulation 1	General Provisions and Definitions (6/28/99)	Y
BAAQMD Regulation 2, Rule 1	General Requirements (4/8/12, effective 8/31/16)	Y
BAAQMD Regulation 2-1-429	Federal Emissions Statement (12/21/04)	Ν
SIP Regulation 2-1-429	Federal Emissions Statement (4/3/95)	Y
BAAQMD Regulation 2, Rule 5	New Source Review of Toxic Air Contaminants (12/7/16)	Ν
BAAQMD Regulation 4	Air Pollution Episode Plan (3/20/91)	Ν
SIP Regulation 4	Air Pollution Episode Plan (8/06/90)	Y

# Table IIIGenerally Applicable Requirements

# III. Generally Applicable Requirements

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)
BAAQMD Regulation 5	Open Burning (6/19/13)	Ν
SIP Regulation 5	Open Burning (9/4/98)	Y
BAAQMD Regulation 6, Rule 1	Particulate Matter, General Requirements (12/5/07)	Ν
SIP Regulation 6	Particulate Matter and Visible Emissions (9/4/98)	Y
BAAQMD Regulation 7	Odorous Substances (3/17/82)	Ν
BAAQMD Regulation 8, Rule 1	Organic Compounds - General Provisions (6/15/94)	Y
BAAQMD Regulation 8, Rule 2	Organic Compounds – Miscellaneous Operations (7/20/05)	Ν
SIP Regulation 8, Rule 2	Organic Compounds – Miscellaneous Operations (3/22/95)	Y
BAAQMD Regulation 8, Rule 3	Organic Compounds - Architectural Coatings (7/1/09)	Ν
SIP Regulation 8, Rule 3	Organic Compounds - Architectural Coatings (1/2/04)	Y
BAAQMD Regulation 8, Rule 4	Organic Compounds - General Solvent and Surface Coating Operation (10/16/02)	Y
BAAQMD Regulation 8, Rule 15	Organic Compounds – Emulsified and Liquid Asphalts (6/1/94)	Y
BAAQMD Regulation 8, Rule 40	Organic Compounds - Aeration of Contaminated Soil and Removal of Underground Storage Tanks (6/15/05)	Ν
SIP Regulation 8, Rule 40	Organic Compounds - Aeration of Contaminated Soil and Removal of Underground Storage Tanks (4/19/01)	Y
BAAQMD Regulation 8, Rule 47	Organic Compounds - Air Stripping and Soil Vapor Extraction Operations (6/15/05)	Ν
SIP Regulation 8, Rule 47	Organic Compounds - Air Stripping and Soil Vapor Extraction Operations (4/26/95)	Y
BAAQMD Regulation 8, Rule 49	Organic Compounds - Aerosol Paint Products (12/20/95)	Ν
SIP Regulation 8, Rule 49	Organic Compounds - Aerosol Paint Products (3/22/95)	Y
BAAQMD Regulation 8, Rule 51	Organic Compounds - Adhesive and Sealant Products (7/17/02)	Ν
SIP Regulation 8, Rule 51	Organic Compounds - Adhesive and Sealant Products (2/26/02)	Y
BAAQMD Regulation 9, Rule 1	Inorganic Gaseous Pollutants - Sulfur Dioxide (3/15/95)	Ν
SIP Regulation 9, Rule 1	Inorganic Gaseous Pollutants - Sulfur Dioxide (6/8/99)	Y
BAAQMD Regulation 11, Rule 2	Hazardous Pollutants - Asbestos Demolition, Renovation and Manufacturing (10/7/98)	N

# Table IIIGenerally Applicable Requirements

# III. Generally Applicable Requirements

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)
BAAQMD Regulation 12, Rule 4	Miscellaneous Standards of Performance - Sandblasting (7/11/90)	Ν
SIP Regulation 12, Rule 4	Miscellaneous Standards of Performance - Sandblasting (9/2/81)	Y
California Health and Safety Code Section 41750 et seq.	Portable Equipment	Ν
California Health and Safety Code Section 44300 et seq.	Air Toxics "Hot Spots" Information and Assessment Act of 1987	N
California Health and Safety Code Title 17, Section 93115	Airborne Toxic Control Measure for Stationary Compression Ignition Engines	Ν
California Health and Safety Code Title 17, Section 93116	Airborne Toxic Control Measure for Diesel Particulate Matter from Portable Engines Rated at 50 Horsepower and Greater	N
40 CFR Part 61, Subpart M	National Emission Standards for Hazardous Air Pollutants – National Emission Standard for Asbestos (7/20/04)	Y
EPA Regulation 40 CFR 82	Protection of Stratospheric Ozone (4/13/05)	Y
Subpart F, 40 CFR 82.156	Recycling and Emission Reductions – Required Practices	Y
Subpart F, 40 CFR 82.161	Recycling and Emissions Reductions – Technician Certification	Y
Subpart F, 40 CFR 82.166	Recycling and Emissions Reductions – Reporting and Recordkeeping Requirements	Y

# Table IIIGenerally Applicable Requirements

# IV. SOURCE-SPECIFIC APPLICABLE REQUIREMENTS

The permit holder shall comply with all applicable requirements, including those specified in the BAAQMD and SIP Rules and Regulations and other federal requirements cited below. The requirements cited in the following tables apply in a specific manner to the indicated source(s).

The dates in parentheses in the Title column identify the versions of the regulations being cited and are, as applicable:

- 1. BAAQMD regulation(s): The date(s) of adoption or most recent amendment of the regulation by the District Board of Directors
- 2 Any federal requirement, including a version of a District regulation that has been approved into the SIP: The most recent date of EPA approval of any portion of the rule, encompassing all actions on the rule through that date

The full text of each permit condition cited is included in Section VI, Permit Conditions, of this permit. The full text of the SIP requirements are available on the EPA Region 9 website. The address is:

http://yosemite.epa.gov/r9/r9sips.nsf/Agency?ReadForm&count=500&state=California&cat= Bay+Area+Air+Quality+Management+District-Agency-Wide+Provisions.

All other text may be found in the regulations themselves.

		Federally	Future
Applicable	Regulation Title or	Enforceable	Effective
Requirement	Description of Requirement	(Y/N)	Date
BAAQMD	Particulate Matter, General Requirements (12/5/07)		
Regulation 6,			
Rule 1			
6-1-301	Ringelmann No. 1 Limitation	Ν	
6-1-305	Visible Particles	Ν	
6-1-401	Appearance of Emissions	Ν	
SIP	Particulate Matter and Visible Emissions (9/4/98)		
<b>Regulation 6</b>			
6-301	Ringelmann No. 1 Limitation	Y	
6-305	Visible Particles	Y	
6-401	Appearance of Emissions	Y	

		Federally	Future
Applicable	Regulation Title or	Enforceable	Effective
Requirement	Description of Requirement	(Y/N)	Date
BAAQMD	Organic Compounds - Surface Preparation and Coating of Marine		
Regulation 8,	Vessels (10/16/02)		
Rule 43			
8-43-301	Limits	Y	
8-43-301.2	Air-Dried Coatings	Y	
8-43-302	Specialty Coating Limits	Y	
8-43-302.1	Anti-foulant	Y	
8-43-302.2	Heat Resistant	Y	
8-43-302.7	Pretreatment Wash Primer	Y	
8-43-302.9	Military Exterior Topcoat	Y	
8-43-302.10	Specialty Interior	Y	
8-43-302.12	Special Marking	Y	
8-43-320	Solvent Evaporative Loss Minimization	Y	
8-43-321	Surface Preparation Standards	Y	
8-43-501	Coating Records	Y	
40 CFR 63,	National Emission Standards for Hazardous Air Pollutants - General		
Subpart A	Provisions (4/22/04)		
63.1	Applicability	Y	
63.1(a)	General	Y	
63.1(b)	Initial Applicability Determination	Y	
63.1(c)	Applicability of this Part after Relevant Standard has been Set	Y	
63.4	Prohibited Activities and Circumvention	Y	
63.5	Preconstruction Review and Notification Requirements	Y	
63.6	Compliance with Standards and Maintenance Requirements	Y	
63.6(a)	Applicability	Y	
63.6(b)	Compliance Dates for New and Reconstructed Sources	Y	
63.6(c)	Compliance Dates for Existing Sources	Y	
63.6(i)	Extension of Compliance with Emission Standards	Y	
63.6(j)	Exemption from Compliance with Emission Standards	Y	
63.9	Notification Requirements	Y	
63.9(a)	Applicability and General Information	Y	
63.9(b)	Initial Notifications	Y	

Applicable	Regulation Title or	Federally Enforceable	Future Effective
Requirement	Description of Requirement	(Y/N)	Date
63.9(c)	Request for Extension of Compliance	Y	
63.9(d)	Notification that Source is Subject to Special Compliance Requirements	Y	
63.9(i)	Adjustment to Time Periods or Postmark Deadlines for Submittal and	Y	
	Review of Required Communications		
63.9(j)	Change in Information Already Provided	Y	
63.10	Recordkeeping and Reporting Requirements	Y	
63.10(a)	Applicability and General Information	Y	
63.10(b)	General Recordkeeping Requirements	Y	
63.10(d)	General Reporting Requirements	Y	
63.15	Availability of Information and Confidentiality	Y	
63.15(a)	Availability of Information	Y	
63.15(b)	Confidentiality	Y	
40 CFR 63,	National Emission Standards for Shipbuilding and Ship Repair		
Subpart II	(Surface Coating) (11/21/11)		
63.781	Applicability	Y	
63.781(a)	Shipbuilding and Ship Repair Operations at a Major Source	Y	
63.781(b)	Exempt Coatings – Low Usage	Y	
63.781(c)	Exempt Coatings – Non-refillable Aerosol Cans, Polyester Resin	Y	
63.781(d)	Subpart A, Startups, Shutdowns, Malfunctions, and Continuous Monitoring does not apply.	Y	
63.783	Standards	Y	
63.783(a)	Volatile Organic HAP	Y	
63.783(b)	Handling, Transfer, and Storage	Y	
63.785	Compliance Procedures	Y	
63.785(a)	Coating - Identification and Certification	Y	
63.785(b)	Coating – Compliance Testing	Y	
63.785(c)	Coating – Other Compliance Options	Y	
63.785(d)	Violations	Y	
63.785(e)	Continuous compliance requirements	Y	
63.786	Test Methods and Procedures	Y	
63.786(a)	Method 24	Y	
63.786(b)	Administrator Approval of Test Method	Y	

		Federally	Future
Applicable	Regulation Title or	Enforceable	Effective
Requirement	Description of Requirement	(Y/N)	Date
63.786(c)	Batch Formulation Data	Y	
63.786(d)	Appendix A Forms and Procedures	Y	
63.786(e)	Performance test requirements	Y	
63.787	Notification Requirements	Y	
63.787(a)	Subpart A Notifications - except §63.9(a) through (d) and (i) through (j) extended to 180 days	Y	
63.788	Recordkeeping and Reporting Requirements	Y	
63.788(a)	Subpart A Recordkeeping and Reporting	Y	
63.788(b)	Recordkeeping	Y	
63.788(c)	6-Month Reporting	Y	
Subpart II Table 2	General Use Coating	Y	
Subpart II Table 2	Anti-foulant Coating	Y	
Subpart II Table 2	Military Exterior Coating	Y	
Subpart II Table 2	Nonskid Coating	Y	
Subpart II Table 2	Pre-treatment Wash Primer	Y	
Subpart II Table 2	Special Marking Coating	Y	
Subpart II Table 2	Specialty Interior Coating	Y	
BAAQMD Condition #3419			
Part 1	Particulate Control (basis: Regulation 6-301, Regulation 6-305)	Y	
Part 2	Wind Monitoring (basis: Regulation 6-305, Regulation 2-6-503)	Y	
Part 3	Visible Emission Check (basis: Regulation 6-301, Regulation 6-305, Regulation 2-6-503)	Y	

# Table IV - ASource-specific Applicable RequirementsS-1 Paint Spraying/Abrasive Blasting Operation

		Federally	Future
Applicable	Regulation Title or	Enforceable	Effective
Requirement	Description of Requirement	(Y/N)	Date
Part 4	Recordkeeping	Y	
	(basis: Regulation 6-301, Regulation 8-43-501, Regulation 2-6-501)		

# Table IV - BSource-specific Applicable RequirementsS-2 Sandblasting Operation

		Federally	Future
Applicable	Regulation Title or	Enforceable	Effective
Requirement	Description of Requirement	(Y/N)	Date
BAAQMD	Particulate Matter, General Requirements (12/5/07)		
Regulation 6,			
Rule 1			
6-1-301	Ringelmann No. 1 Limitation	N	
6-1-305	Visible Particles	N	
6-1-401	Appearance of Emissions	N	
SIP	Particulate Matter and Visible Emissions (9/4/98)		
<b>Regulation 6</b>			
6-301	Ringelmann No. 1 Limitation	Y	
6-305	Visible Particles	Y	
6-401	Appearance of Emissions	Y	
BAAQMD			
Condition			
#3420			
Part 1	Visible Emissions Monitoring	Y	
	(basis: Regulation 6-301, Regulation 6-305, Regulation 2-6-503)		
Part 2	Recordkeeping	Y	
	(basis: Regulation 6-301, Regulation 6-305, Regulation 2-6-501)		

## Table IV - C Source-specific Applicable Requirements S-10 Paint Spray Booth

		Federally	Future
Applicable	Regulation Title or	Enforceable	Effective
Requirement	Description of Requirement	(Y/N)	Date
BAAQMD	Organic Compounds - Surface Preparation and Coating of Marine		
Regulation 8,	Vessels (10/16/02)		
Rule 43			
8-43-301	Limits	Y	
8-43-301.2	Air-Dried Coatings	Y	
8-43-302	Specialty Coating Limits	Y	
8-43-302.1	Anti-foulant	Y	
8-43-302.2	Heat Resistant	Y	
8-43-302.7	Pretreatment Wash Primer	Y	
8-43-302.9	Military Exterior Topcoat	Y	
8-43-302.10	Specialty Interior	Y	
8-43-302.12	Special Marking	Y	
8-43-320	Solvent Evaporative Loss Minimization	Y	
8-43-321	Surface Preparation Standards	Y	
8-43-501	Coating Records	Y	
40 CFR 63,	National Emission Standards for Hazardous Air Pollutants – General		
Subpart A	Provisions (4/22/04)		
63.1	Applicability	Y	
63.1(a)	General	Y	
63.1(b)	Initial Applicability Determination	Y	
63.1(c)	Applicability of this Part after Relevant Standard has been Set	Y	
63.4	Prohibited Activities and Circumvention	Y	
63.5	Preconstruction Review and Notification Requirements	Y	
63.6	Compliance with Standards and Maintenance Requirements	Y	
63.6(a)	Applicability	Y	
63.6(b)	Compliance Dates for New and Reconstructed Sources	Y	
63.6(c)	Compliance Dates for Existing Sources	Y	
63.6(i)	Extension of Compliance with Emission Standards	Y	
63.6(j)	Exemption from Compliance with Emission Standards	Y	
63.9	Notification Requirements	Y	
63.9(a)	Applicability and General Information	Y	
63.9(b)	Initial Notifications	Y	

## Table IV - C Source-specific Applicable Requirements S-10 Paint Spray Booth

Applicable	Deconlotion Title on	Federally	Future Effective	
Applicable Requirement	Regulation Title or Description of Requirement	Enforceable (Y/N)	Date	
63.9(c)	Request for Extension of Compliance	Y	Date	
63.9(d)	Notification that Source is Subject to Special Compliance Requirements	Y		
63.9(i)	Adjustment to Time Periods or Postmark Deadlines for Submittal and	Y		
05.7(1)	Review of Required Communications	1		
63.9(j)	Change in Information Already Provided	Y		
63.10	Recordkeeping and Reporting Requirements	Y		
63.10(a)	Applicability and General Information	Y		
63.10(b)	General Recordkeeping Requirements	Y		
63.10(d)	General Reporting Requirements	Y		
63.15	Availability of Information and Confidentiality	Y		
63.15(a)	Availability of Information	Y		
63.15(b)	Confidentiality	Y		
40 CFR 63,	National Emission Standards for Shipbuilding and Ship Repair			
Subpart II	(Surface Coating) (11/21/11)			
63.781	Applicability	Y		
63.781(a)	Shipbuilding and Ship Repair Operations at a Major Source	Y		
63.781(b)	Exempt Coatings – Low Usage	Y		
63.781(c)	Exempt Coatings - Non-refillable Aerosol Cans, Polyester Resin	Y		
63.781(d)	Subpart A, Startups, Shutdowns, Malfunctions, and Continuous Monitoring does not apply.	Y		
63.783	Standards	Y		
63.783(a)	Volatile Organic HAP	Y		
63.783(b)	Handling, Transfer, and Storage	Y		
63.785	Compliance Procedures	Y		
63.785(a)	Coating - Identification and Certification	Y		
63.785(b)	Coating – Compliance Testing	Y		
63.785(c)	Coating – Other Compliance Options	Y		
63.785(d)	Violations	Y		
63.785(e)	Continuous compliance requirements	Y		
63.786	Test Methods and Procedures	Y		
63.786(a)	Method 24	Y		
63.786(b)	Administrator Approval of Test Method	Y		

## Table IV - C Source-specific Applicable Requirements S-10 Paint Spray Booth

Applicable	Regulation Title or	Federally Enforceable	Future Effective	
Requirement	Description of Requirement	(Y/N)	Date	
63.786(c)	Batch Formulation Data	Y		
63.786(d)	Appendix A Forms and Procedures	Y		
63.786(e)	Performance test requirements	Y		
63.787	Notification Requirements	Y		
63.787(a)	Subpart A Notifications - except §63.9(a) through (d) and (i) through (j)	Y		
	extended to 180 days			
63.788	Recordkeeping and Reporting Requirements	Y		
63.788(a)	Subpart A Recordkeeping and Reporting	Y		
63.788(b)	Recordkeeping	Y		
63.788(c)	6-Month Reporting	Y		
Subpart II	General Use Coating	Y		
Table 2				
Subpart II	Anti-foulant Coating	Y		
Table 2				
Subpart II	Military Exterior Coating	Y		
Table 2				
Subpart II	Nonskid Coating	Y		
Table 2				
Subpart II	Pre-treatment wash primer	Y		
Table 2				
Subpart II	Special Marking Coating	Y		
Table 2				
Subpart II	Specialty Interior Coating	Y		
Table 2				
BAAQMD				
Condition				
#7887				
Part 1	Annual VOC Emissions Limit (basis: Cumulative Increase)	Y		
Part 2	Daily VOC Emissions Limit (basis: Cumulative Increase)	Y		
Part 3	Annual Coating Throughput Limit (basis: Cumulative Increase)	Y		
Part 4	Daily Coating Throughput Limit (basis: Cumulative Increase)	Y		
Part 5	Annual Solvent Throughput Limit (basis: Cumulative Increase)	Y		

### Table IV - C Source-specific Applicable Requirements S-10 Paint Spray Booth

		Federally	Future
Applicable	Regulation Title or	Enforceable	Effective
Requirement	Description of Requirement	(Y/N)	Date
Part 6	Daily Solvent Throughput Limit (basis: Avoidance of BACT)	Y	
Part 7	Recordkeeping (basis: Regulation 8-43-501, Regulation 2-6-501)	Y	

# Table IV - DSource-specific Applicable RequirementsS-12 Polyester Resin Operation, Hand-Layup

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 8, Rule 50	Organic Compounds – Polyester Resin Operations (11/06/96)		
8-50-301	Process Requirements	Y	
8-50-301.1	Monomer content of no greater than 35 percent by weight	Y	
8-50-305	Surface Preparation and Clean-up Solvent	Y	
8-50-501	Records	Y	
BAAQMD Condition #17063			
Part 1	Annual Resin Throughput Limit (basis: Cumulative Increase)	Y	
Part 2	Annual Solvent Throughput Limit (basis: Cumulative Increase)	Y	
Part 3	Recordkeeping (basis: Regulation 8-50-501, Regulation 2-6-501)	Y	

# Table IV - ESource-specific Applicable RequirementsS-13 Auxiliary Harbor Craft Prime Diesel Engine on Drydock#2

Applicable	Regulation Title or	Federally Enforceable	Future Effective
Requirement	Description of Requirement	(Y/N)	Date
BAAQMD	Particulate Matter, General Requirements (12/5/07)		
Regulation 6,			
Rule 1			
6-1-303	Ringelmann No. 2 Limitation	N	
6-1-303.1	Internal Combustion Engines less than 1500 cubic inch displacement	Ν	
6-1-305	Visible Particles	Ν	
6-1-310	Particulate Weight Limitation	N	
6-1-401	Appearance of Emissions	Ν	
SIP	Particulate Matter and Visible Emissions (9/4/98)		
<b>Regulation 6</b>			
6-303	Ringelmann No. 2 Limitation	Y	
6-303.1	Internal Combustion Engines less than 1500 cubic inch displacement	Y	
6-305	Visible Particles	Y	
6-310	Particulate Weight Limitation	Y	
6-401	Appearance of Emissions	Y	
BAAQMD Regulation 9, Rule 1	Inorganic Gaseous Pollutants – Sulfur Dioxide (3/15/95)		
9-1-301	Limitations on Ground Level Concentrations	N	
9-1-304	Fuel Burning (Liquid and Solid Fuels)	Ν	
BAAQMD	Inorganic Gaseous Pollutants – Nitrogen Oxides and Carbon		
Regulation 9, Rule 8	Monoxide from Stationary Internal Combustion Engines (8/1/01)		
9-8-111.3	Limited Exemption for Low Usage (< 100 hours per year)	N	
9-8-502.1	Recordkeeping	Ν	
9-8-530	Emergency Standby and Low Usage Engines, Monitoring and Recordkeeping	Ν	

Table IV - E
Source-specific Applicable Requirements
S-13 Auxiliary Harbor Craft Prime Diesel Engine on Drydock#2

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date	
California Code of Regulations, Title 17, Section 93118.5	Airborne Toxic Control Measure for Commercial Harbor Craft			
93118.5(e)(1)	All Harbor Craft – Low Sulfur Fuel Use Requirement	Ν		
93118.5(e)(2)	All Harbor Craft – Installation and Use of Non-Resettable Hour Meters	Ν		
93118.5(g)	Recordkeeping requirements	Ν		
BAAQMD Condition # 24809				
Part 1	Hours of Operation (basis: cumulative increase)	Y		
Part 2	Ringelmann No. 2 Limitation (basis: Regulation 6-1-303)	Y		
Part 3	Recordkeeping (basis: "ATCM for Diesel Engines on Harbor Craft", CA Code of Regulations, Title 17, chapter 1, subchapter 7.5, section 93118.5(g))	Ν		

# Table IV - FSource-specific Applicable RequirementsS-16 Abrasive Blast Room with Pneumatic Recovery System

		Federally	Future
Applicable	Regulation Title or	Enforceable	Effective
Requirement	Description of Requirement	(Y/N)	Date
BAAQMD	Particulate Matter, General Requirements (12/5/07)		
Regulation 6,			
Rule 1			
6-1-301	Ringelmann No. 1 Limitation	Ν	

# Table IV - FSource-specific Applicable RequirementsS-16 Abrasive Blast Room with Pneumatic Recovery System

		Federally	Future
Applicable	Regulation Title or	Enforceable	Effective
Requirement	Description of Requirement	(Y/N)	Date
6-1-305	Visible Particles	Ν	
6-1-310	Particulate Weight Limitation	Ν	
6-1-311	General Operations	Ν	
6-1-401	Appearance of Emissions	Ν	
SIP	Particulate Matter and Visible Emissions (9/4/98)		
<b>Regulation 6</b>			
6-301	Ringelmann No. 1 Limitation	Y	
6-305	Visible Particles	Y	
6-310	Particulate Weight Limitation	Y	
6-311	General Operations	Y	
6-401	Appearance of Emissions	Y	
BAAQMD			
Condition			
#23507			
Part 1	Material Restrictions (basis: cumulative increase)	Y	
Part 2	Material throughput limit (basis: cumulative increase)	Y	
Part 3	Abatement requirement (basis: cumulative increase)	Y	
Part 4	Abrasive throughput limit (basis: 40 CFR 64)	Y	
Part 5	Exhaust grain loading limit (basis: (basis: cumulative increase, BACT)	Y	
Part 6	Recordkeeping (basis: cumulative increase, BACT)	Y	
Part 7	Manometer gauge requirement	Y	
	(basis: cumulative increase, Regulation 2-6-503)		
Part 8	Pressure Drop Range (basis: cumulative increase, Regulation 2-6-503)	Y	
Part 9	Pressure Drop Monitoring	Y	
	(basis: cumulative increase, Regulation 2-6-503)		

# V. SCHEDULE OF COMPLIANCE

The permit holder shall comply with all applicable requirements cited in this permit. The permit holder shall also comply with applicable requirements that become effective during the term of this permit on a timely basis.

# VI. PERMIT CONDITIONS

Any condition that is preceded by an asterisk is not federally enforceable.

### Condition #3419 Application 1005, Revised under Application 16485 For S-1, Paint Spraying/Abrasive Blasting Operation

- 1. Tarp, curtains, and shrouding shall be used at all times during paint spray or abrasive blasting operations. (basis: District Regulation 6-301, District Regulation 6-305)
- 2. A windsock shall be used to determine wind direction and wind velocity. Paint spraying operation shall stop when wind direction and velocity indicates that particles are blowing off the facility site. (basis: District Regulation 6- 305, District Regulation 2-6-503)
- 3. The abrasive blasting operation shall be visually checked for visible emissions while the equipment is operating at all times. If any visible emissions are detected, the operator shall shut down the operation and take corrective action until visible emissions are no longer detected. (basis: District Regulation 6-301, District Regulation 6-305, District Regulation 2-6-503)
- 4. The daily usage of all coating, clean-up solvent, abrasive, and visible emission checks, along with any corrective action taken, shall be recorded in a District approved log and retained for at least five years from date of entry. This log shall be kept on site and made available to the district staff upon request. (basis: District Regulation 6-301, District Regulation 8-43-501, District Regulation 2-6-501)

# Condition #3420

## Application 1005, Revised under Application 16485 For S-2 Sandblasting Operation

1. The abrasive blasting operation shall be visually checked for visible emissions

while the equipment is operating at all times. If any visible emissions are detected, the operator shall shut down the operation and take corrective action until visible emissions are no longer detected. (basis: District Regulation 6-301, District Regulation 6-305, District Regulation 2-6-503)

 The daily throughput of sandblasting material and records of all visible emission checks, along with any corrective action taken, shall be recorded in a District approved log and retained for at least five years from date of entry. This log shall be kept on site and made available to the district Staff upon request. (basis: District Regulation 6-301, District Regulation 6-305, District Regulation 2-6-501)

### Condition #7887 Application 4789, Revised under Application 16485, 11369 For S-10, Paint Spray Booth

- 1. The total release of precursor organic compounds from this painting operation (S-10) shall not exceed 22.5 tons in any consecutive 12-month period. (basis: Cumulative Increase)
- 2. The total release of precursor organic compounds from this painting operation (S-10) shall not exceed 140 pounds in any day. (basis: Cumulative Increase)
- 3. The total usage of coating at S-10 shall not exceed 12,600 gallons in any consecutive 12-month period. (basis: Cumulative Increase)
- 4. The total usage of coating at S-10 shall not exceed 40 gallons in any day. (basis: Cumulative Increase)
- 5. The total usage of cleanup solvent shall not exceed 1385 gallons in any consecutive 12-month period. (basis: Cumulative Increase)
- 6. The total usage of cleanup solvent shall not exceed 4 gallons in any day. (basis: Cumulative Increase)
- 7. The type, VOC content, and amount of coating and cleanup solvent used shall be recorded, in a District approved log, on a daily basis. This record shall be retained for a period of at least five years from date of entry. It shall be kept on site and made available to the District staff upon request. (basis: Cumulative Increase, District Regulation 8-43-501, District Regulation 2-6-501)

Condition #17063 Application 807 For S-12, Polyester Resin Operation

- The total amount of polyester resin material used at S-12 shall not exceed 200 gallons during any consecutive twelve-month period. (basis: Cumulative Increase)
- 2. The total amount of acetone used at S-12 shall not exceed 10 gallons during any consecutive twelve-month period. (basis: Cumulative Increase)
- 3. In order to demonstrate compliance with above conditions, the following shall be maintained in a District approved log and retained for at least five years from date of entry. This log shall be kept on site and made available to the District staff upon request.
  - a) The type, monomer content, amount of polyester resin, and solvent used monthly.

(basis: District Regulation 8-50-501, District Regulation 2-6-501)

### Condition# 23507

BAE Ship Repair, P#3288 Applications #15850, 22063 Conditions for S-16, Abrasive Blast Room with 4 Blasting Nozzles and Pneumatic Recovery System, abated by A-16, Dust Collector, Clemco Industries, Model CDF-48, 48,000 cfm

 The owner/operator shall ensure that only unpainted metal surfaces and metal surfaces coated with the following coatings are processed at S-16: Amercoat 235 Epoxy Amerlock 2 VOC Epoxy Amercoat 140 Epoxy Interguard 264 Epoxy Amershield Black Urethane Interthane 990HS Urethane Interspeed 640 Black Antifoulant Coating

PPG Industries ABC #3 Black Antifoulant Coating (basis: Cumulative Increase, Regulation 2, Rule 5)

- 2. The owner/operator shall ensure that processing of coated metal surfaces at S-16 does not exceed the following limits:
- a. Combined limit for both the Interspeed 640 Black and PPG Industries ABC #3 Black Antifoulant Coatings: 2,900 hours in any consecutive 12-month period

b. For PPG Industries ABC #3 Black Antifoulant Coating: 30 minutes per hour (basis: Regulation 2, Rule 5)

- The owner/operator shall operate S-16 such that the abrasive throughput does not exceed 750,000 pounds per consecutive twelve-month period. (basis: 40 CFR 64)
- 4. The owner/operator shall ensure that emissions from S-16 are abated by the properly maintained Dust Collector, A-16, at all times that S-16 is operating. (basis: Cumulative Increase, BACT)
- The owner/operator shall ensure that emissions from A-16 do not exceed 0.002 grains per dry standard cubic foot of exhaust volume and shall ensure compliance with this limit by maintaining A-16 per the manufacturer's servicing and maintenance recommendations. (basis: Cumulative Increase, BACT)
- 6. To demonstrate compliance with conditions #1, #2, and #3, the owner/operator of S-16 shall maintain the following records in a District-approved log:a. Daily hours of operation;

b. For all coated parts processed at this source, a record of the coating name and the processing duration (hours);

c. For PPG Industries ABC #3 Black Antifoulant Coating, the processing duration in minutes per hour;

d. Maintenance records for A-16, including the date and description of service; e. At the end of each month, the total hours of operation from Part 6(a) shall be summed for the month;

f. At the end of each month, the total hours of operation from Part 6(b) shall be summed for the month for each coating;

- g. At the end of each month, the maximum number of minutes per hour of S-16 operation subject to Part 2(b) shall be noted for the month; and
- h. At the end of each month, the sums from Parts 6(e) and (f) shall be totaled for the previous 12-month period.

i. Abrasive throughput in pounds per month and totaled over a consecutive twelve-month period.

These records shall be maintained onsite for a minimum of 5 years from the date that the record was made and shall be made available for District inspection upon request.

(basis: Cumulative Increase, BACT, Regulation 2, Rule 5, Regulation 2, Rule 6)

- 7. The owner/operator shall insure that A-16 Baghouse is equipped with a manometer gauge to measure the pressure drop across the filter bags in inches water column. (basis: cumulative increase, Regulation 2-6-503)
- 8. The owner/operator shall insure that the pressure drop across the filter bags at A-16 Baghouse shall be no lower 0.5 inches water column and no higher than 6.0 inches water column whenever S-16 and A-16 are in operation to verify compliance with parts 3 and 4. (basis: cumulative increase, Regulation 2-6-503)
- 9. The owner/operator of S-16 and A-16 shall monitor and record the pressure drop across the filter bags at A-16 on a weekly basis. These records shall be maintained on site for a minimum of 5 years from the date of record and shall be made available for inspection by District personnel upon request. (basis: cumulative increase, Regulation 2-6-503)

## Condition #24809 For S-13 Auxiliary Harbor Craft Engine on Dry Dock #2

S-13 Auxiliary Harbor Craft Engine on Dry-dock #2 BAE Systems San Francisco Ship Repair Inc. (Oct 2010)

- 1. The total hours of operation for S-13 are limited to no more than 80 hours per year. [Basis: Cumulative increase]
- 2. Visible particulate emissions from S-13 shall not be as dark as or darker than No. 1 on Ringlemann Chart for a period or periods aggregating more than three minutes in any hour. [Basis: District Regulation 6-301]
- 3. Records: The owner/operator shall maintain the following monthly records in a District-approved log for at least 36 months from the date of entry (60 months if the facility has been issued a Title V Major Facility Review Permit or a Synthetic Minor Operating Permit). Log entries shall be retained on-site, either

at a central location or at the engine's location, and made immediately available to the District staff upon request.

a. Hours of operation.

b. Fuel usage for each engine(s).

[Basis: "ATCM for Diesel Engines on Commercial Harbor Craft" CA Code of Regulations, Title 17, chapter 1, subchapter 7.5, section 93118.5(g)

# VII. APPLICABLE LIMITS & COMPLIANCE MONITORING REQUIREMENTS

This section has been included only to summarize the applicable emission limits contained in Section IV, Source-Specific Applicable Requirements, of this permit. The following tables show the relationship between each emission limit and the associated compliance monitoring provisions, if any. The monitoring frequency indicates whether periodic (P) or continuous (C) monitoring is required. For periodic monitoring, the frequency of the monitoring has also been shown, using the following codes: annual (A), quarterly (Q), monthly (M), weekly (W), daily (D), or on an event basis (E). No monitoring (N) has been required if the current applicable rule or regulation does not require monitoring, and the operation is unlikely to deviate from the applicable emission limit based upon the nature of the operation.

This section is only a summary of the limits and monitoring requirements. In the case of a conflict with any requirement in Sections I-VI, the preceding sections take precedence over Section VII.

Type of	Citation of Limit	FE	Future Effective		Monitoring Requirement	Monitoring Frequency	Monitoring
limit		Y/N	Date	Limit	Citation	(P/C/N)	Туре
Opacity	BAAQMD	Ν		Ringelmann #1 Limitation	BAAQMD	P/E	Visible
	6-1-301			for $\leq$ 3 minutes/hour	Condition		Emission
					#3419, Part 3		Checks
Opacity	SIP	Y		Ringelmann #1 Limitation	BAAQMD	P/E	Visible
	6-301			for $\leq$ 3 minutes/hour	Condition		Emission
					#3419, Part 3		Checks
VOC	BAAQMD	Y		General coating: air dried	BAAQMD	P/D	Records
	8-43-301.2			2.8 lbs VOC/gal*	8-43-501		
VOC	BAAQMD	Y		Anti-foulant coating:	BAAQMD	P/D	Records
	8-43-302.1			3.3 lbs VOC/gal*	8-43-501		
VOC	BAAQMD	Y		Heat Resistant coating:	BAAQMD	P/D	Records
	8-43-302.2			3.5 lbs VOC/gal*	8-43-501		
VOC	BAAQMD	Y		Pretreatment Wash Primer:	BAAQMD	P/D	Records
	8-43-302.7			3.5 lbs VOC/gal*	8-43-501		
VOC	BAAQMD	Y		Military Exterior Topcoat:	BAAQMD	P/D	Records
	8-43-302.9			2.8 lbs VOC/gal*	8-43-501		
VOC	BAAQMD	Y		Specialty Interior coating:	BAAQMD	P/D	Records
	8-43-302.10			2.8 lbs VOC/gal*	8-43-501		

Table VII – AApplicable Limits and Compliance Monitoring RequirementsS-1 Paint Spray/Abrasive Blasting Operation

			-	-			
	Citation of		Future		Monitoring	Monitoring	
Type of	Limit	FE	Effective		Requirement	Frequency	Monitoring
limit		Y/N	Date	Limit	Citation	(P/C/N)	Туре
VOC	BAAQMD	Y		Special Marking coating:	BAAQMD	P/D	Records
	8-43-302.12			4.1 lbs VOC/gal*	8-43-501		
VOC	BAAQMD	Y		Surface Preparation	BAAQMD	P/D	Records
	8-43-321			Solvent	8-43-501		
				0.42 lbs/gal			
VOC	40 CFR	Y		General Coating	40 CFR	P/M	Records
	63.783a, Table			2.83 lbs VOC/gal*	63.788		
	2, Subpart II						
VOC	40 CFR	Y		Anti-foulant Coating	40 CFR	P/M	Records
	63.783a, Table			3.33 lbs VOC/gal*	63.788		
	2, Subpart II						
VOC	40 CFR	Y		Pretreatment Wash Primer	40 CFR	P/M	Records
	63.783a, Table			6.50 lbs VOC/gal*	63.788		
	2, Subpart II						
VOC	40 CFR	Y		Special Marking Coating	40 CFR	P/M	Records
	63.783a, Table			4.08 lbs VOC/gal*	63.788		
	2 Subpart II						
VOC	40 CFR	Y		Military Exterior Coating	40 CFR	P/M	Records
	63.783a, Table			2.83 lbs VOC/gal*	63.788		
	2, Subpart II						
VOC	40 CFR	Y		Nonskid Coating	40 CFR	P/M	Records
	63.783a, Table			2.83 lbs VOC/gal*	63.788		
	2, Subpart II						
VOC	40 CFR	Y		Specialty Interior Coating	40 CFR	P/M	Records
	63.783a, Table			2.83 lbs VOC/gal*	63.788		
	2, Subpart II						

# Table VII – A Applicable Limits and Compliance Monitoring Requirements S-1 Paint Spray/Abrasive Blasting Operation

\* Excluding water and exempt solvents

Table VII - B
Applicable Limits and Compliance Monitoring Requirements
S-2 Sandblasting operation

	Citation of		Future		Monitoring	Monitoring	
Type of	Limit	FE	Effective		Requirement	Frequency	Monitoring
Limit		Y/N	Date	Limit	Citation	(P/C/N)	Туре
Opacity	BAAQMD	Ν		Ringelmann #1	BAAQMD	P/E	Visible
	6-1-301			Limitation for $\leq 3$	Condition		Emissions
				minutes/hour	#3420, Part 1		Checks
Opacity	SIP 6-301	Y		Ringelmann #1	BAAQMD	P/E	Visible
				Limitation for $\leq 3$	Condition		Emissions
				minutes/hour	#3420, Part 1		Checks

# Table VII - CApplicable Limits and Compliance Monitoring Requirements<br/>S-10 Paint Spray Booth

Type of	Citation of limit	FE	Future Effective		Monitoring Requirement	Monitoring Frequency	Monitoring
Limit		Y/N	Date	Limit	Citation	(P/C/N)	Туре
VOC	BAAQMD	Y		General coating: air dried	BAAQMD	P/D	Records
	8-43-301.2			2.8 lbs VOC/gal*	8-43-501		
	BAAQMD	Y		Anti-foulant coating:	BAAQMD	P/D	Records
	8-43-302.1			3.3 lbs VOC/gal*	8-43-501		
	BAAQMD	Y		Heat Resistant coating:	BAAQMD	P/D	Records
	8-43-302.2			3.5 lbs VOC/gal*	8-43-501		
	BAAQMD	Y		Pretreatment Wash Primer:	BAAQMD	P/D	Records
	8-43-302.7			3.5 lbs VOC/gal*	8-43-501		
	BAAQMD	Y		Military Exterior Topcoat:	BAAQMD	P/D	Records
	8-43-302.9			2.8 lbs VOC/gal*	8-43-501		
	BAAQMD	Y		Specialty Interior coating:	BAAQMD	P/D	Records
	8-43-302.10			2.8 lbs VOC/gal*	8-43-501		
	BAAQMD	Y		Special Marking coating:	BAAQMD	P/D	Records
	8-43-302.12			4.1 lbs VOC/gal*	8-43-501		

Table VII - C
Applicable Limits and Compliance Monitoring Requirements
S-10 Paint Spray Booth

	Citation of		Future		Monitoring	Monitoring	
Type of	limit	FE	Effective		Requirement	Frequency	Monitoring
Limit		Y/N	Date	Limit	Citation	(P/C/N)	Туре
VOC	BAAQMD	Y		Surface Preparation	BAAQMD	P/D	Records
	8-43-321			Solvent	8-43-501		
				0.42 lbs/gal			
	Condition	Y		Emission Limit 22.5 TPY	BAAQMD	P/D	Records
	#7887, Part 1				Condition #		
					7887, Part 7		
	Condition	Y		Emission Limit 140 lb/day	BAAQMD	P/D	Records
	#7887, Part 2				Condition #		
					7887, Part 7		
	Condition	Y		Coating Usage Limit	BAAQMD	P/D	Records
	#7887, Part 3			12,600 gal/yr	Condition #		
					7887, Part 7		
	Condition	Y		Coating Usage Limit	BAAQMD	P/D	Records
	#7887, Part 4			40 gal/day	Condition #		
					7887, Part 7		
VOC	Condition	Y		Solvent Usage Limit	BAAQMD	P/D	Records
	#7887, Part 5			1,385 gal/yr	Condition #		
					7887, Part 7		
	Condition	Y		Solvent Usage Limit	BAAQMD	P/D	Records
	#7887, Part 6			4 gal/day	Condition #		
					7887, Part 7		
	40 CFR	Y		General Coating	40 CFR	P/M	Records
	63.783a, Table			2.83 lbs VOC/gal*	63.788		
	2, Subpart II						
	40 CFR	Y		Antifoulant Coating	40 CFR	P/M	Records
	63.783a, Table			3.33 lbs VOC/gal*	63.788		
	2, Subpart II						
	40 CFR	Y		Pretreatment Wash Primer	40 CFR	P/M	Records
	63.783a, Table			6.50 lbs VOC/gal*	63.788		
	2, Subpart II						

Table VII - C
Applicable Limits and Compliance Monitoring Requirements
S-10 Paint Spray Booth

	Citation of		Future		Monitoring	Monitoring	
Type of	limit	FE	Effective		Requirement	Frequency	Monitoring
Limit		Y/N	Date	Limit	Citation	(P/C/N)	Туре
	40 CFR	Y		Special Marking Coating	40 CFR	P/M	Records
	63.783a, Table			4.08 lbs VOC/gal*	63.788		
	2, Subpart II						
	40 CFR	Y		Military Exterior Coating	40 CFR	P/M	Records
	63.783a, Table			2.83 lbs VOC/gal*	63.788		
	2, Subpart II						
	40 CFR	Y		Nonskid Coating	40 CFR	P/M	Records
	63.783a, Table			2.83 lbs VOC/gal*	63.788		
	2, Subpart II						
	40 CFR	Y		Specialty Interior Coating	40 CFR	P/M	Records
	63.783a, Table			2.83 lbs VOC/gal*	63.788		
	2, Subpart II						

\* Excluding water and exempt solvents

# Table VII - DApplicable Limits and Compliance Monitoring RequirementsS-12 Polyester Resin Operation

	Citation of		Future		Monitoring	Monitoring	
Type of	Limit	FE	Effective		Requirement	Frequency	Monitoring
Limit		Y/N	Date	Limit	Citation	(P/C/N)	Туре
VOC	BAAQMD	Y		Monomer content	BAAQMD	P/D	Records
	8-50-301.1			$\leq$ 35% by wt.	8-43-501		
	BAAQMD	Y		Cleanup material	BAAQMD	P/D	Records
	8-50-305.4			1.70 lbs VOC/gal	8-43-501		
	Condition	Y		Resin Usage 200 gal/yr	BAAQMD	P/D	Records
	#17063, Part 1				Condition		
					#17063, Part 3		

	Citation of		Future		Monitoring	Monitoring	
Type of	Limit	FE	Effective		Requirement	Frequency	Monitoring
Limit		Y/N	Date	Limit	Citation	(P/C/N)	Туре
VOC	Condition	Y		Solvent Usage 10	BAAQMD	P/D	Records
	#17063, Part 2			gal/yr	Condition		
					#17063, Part 3		

# Table VII - DApplicable Limits and Compliance Monitoring RequirementsS-12 Polyester Resin Operation

# Table VII - EApplicable Limits and Compliance Monitoring RequirementsS-13 Auxiliary Harbor Craft Prime Diesel Engine, Dry Dock #2

Transf	Citation of	EE	Future		Monitoring	Monitoring	
Type of Limit	Limit	FE Y/N	Effective Date	Limit	Requirement Citation	Frequency (P/C/N)	Monitoring Type
			Date				
Opacity	BAAQMD	N		Ringelmann #2 Limitation	None	Ν	N/A
	6-1-303.1			for $\leq 3$ minutes/hour			
Opacity	SIP 6-303.1	Y		Ringelmann #2 Limitation	None	Ν	N/A
				for $\leq$ 3 minutes/hour			
FP	BAAQMD	Ν		0.15 gr/dscf	None	Ν	N/A
	6-1-310						
FP	SIP	Y		0.15 gr/dscf	None	Ν	N/A
	6-310						
SO2	BAAQMD	Y		Ground Level Concentration	None	Ν	N/A
	9-1-301			$\leq$ 0.5 ppm continuously for 3			
				minutes			
				$\leq 0.25$ ppm averaged over			
				60 minutes			
				$\leq 0.05$ ppm averaged over			
				24 hours			

Table VII - E
Applicable Limits and Compliance Monitoring Requirements
S-13 Auxiliary Harbor Craft Prime Diesel Engine, Dry Dock #2

Type of	Citation of Limit	FE	Future Effective		Monitoring Requirement	Monitoring Frequency	Monitoring
Limit		Y/N	Date	Limit	Citation	(P/C/N)	Туре
Hours of	40 CFR 63,	Y		Maintenance checks and	40 CFR	Р	Records
operation	Subpart			readiness testing less than	Part 63,		
	ZZZZ,			100 hr/yr	Subpart		
	63.6640			- • •, j -	ZZZZ,		
	(f)(1)(ii)				63.6655(e)		
Hours of	BAAQMD	Y		Hours of operation for any	BAAQMD	P/M	Records
operation	Condition			purpose not to exceed 80	Condition		
	#24809,			hours per year	#24809,		
	part 1				part 3		

# Table VII - FApplicable Limits and Compliance Monitoring RequirementsS–16 Abrasive Blast Room with Pneumatic Recovery System

Type of	Citation of Limit	FE	Future Effective		Monitoring Requirement	Monitoring Frequency	Monitoring
Limit		Y/N	Date	Limit	Citation	(P/C/N)	Туре
Opacity	BAAQMD	Ν		Ringelmann #1	BAAQMD	P/E	Visible
	6-1-301			Limitation for $\leq 3$	Condition		Emissions
				minutes/hour	#3420, Part 1		Checks
Opacity	SIP 6-301	Y		Ringelmann #1	BAAQMD	P/E	Visible
				Limitation for $\leq 3$	Condition		Emissions
				minutes/hour	#3420, Part 1		Checks
FP	BAAQMD	Ν		0.15 gr/dscf	None	Ν	
	6-1-310						
FP	SIP	Y		0.15 gr/dscf	None	Ν	
	6-310						
FP	BAAQMD	Ν		3.05 lb/hr	None	Ν	
	6-1-311						

Table VII - F
Applicable Limits and Compliance Monitoring Requirements
S-16 Abrasive Blast Room with Pneumatic Recovery System

Transf	Citation of	EE	Future		Monitoring	Monitoring	
Type of	Limit	FE	Effective	T * */	Requirement	Frequency	Monitoring
Limit		Y/N	Date	Limit	Citation	(P/C/N)	Туре
FP	SIP	Y		3.05 lb/hr	None	Ν	
	6-311						
FP	BAAQMD	Y		0.002 gr/dscf	BAAQMD	P/W	Manometer
	Condition				Condition		reading
	#23507, part 4				#23507, part 8		
Hours of	BAAQMD	Y		2,900 hours per year	BAAQMD	P/D	Record-
operation	Condition			for anti-foulant	Condition		keeping
	#23507, part 2			coating, 30 minutes	#23507, part 6		
				per hour for ABC #3			
				coating			
Pressure	BAAQMD	Y		Pressure drop range:	BAAQMD	P/W	Manometer
Drop	Condition			0.5 to 6.0 inches	Condition		reading
	#23507, part 8			water column	#23507, part 9		
Abrasive	BAAQMD			750,000 pounds per	BAAQMD	P/M	Record-
throughput	Condition			consecutive twelve-	Condition		keeping
	#23507, part 4			month period	#23507, part 6		

# **VIII. TEST METHODS**

The test methods associated with the emission limit of a District regulation are generally found in Section 600 et seq. of the regulation. The following table indicates only the test methods associated with the emission limits included in Section VII, Applicable Emission Limits & Compliance Monitoring Requirements, of this permit.

# Table VIIITest Methods

Applicable		
Requirement	Description of Requirement	Acceptable Test Methods
BAAQMD 6-1-301	Ringelmann No. 1 Limitation	Manual of Procedures, Volume I, Evaluation of Visible Emissions
BAAQMD 8-43-301	Surface Coating of Marine Vessels	Manual of Procedures, Volume III, Method 21 or 22, Nonmethane Organic Carbon Sampling
BAAQMD 8-50-301	Polyester Resin Operations	Manual of Procedures, Volume III, Method 23 and 31, Nonmethane Organic Carbon Sampling
40 CFR 63.783(a)	Volatile Organic HAP	EPA Method 24

Facility Name: Puglia Engineering, Inc. San Francisco Shipyard Permit for Facility #: A3288

# IX. PERMIT SHIELD

Not Applicable

# X. REVISION HISTORY

Final Major Facility Review Permit Issuance (Application 16485)	June 1, 2000
Final Issuance of Major Facility Review Permit Renewal (Application 11369)	September 13, 2005
Final Issuance of Major Facility Review Permit Renewal (Application 21887)	May 10, 2011
Final Issuance of Major Facility Review Permit Renewal (Application 27856)	February 24, 2017

# XI. GLOSSARY

ACT

Federal Clean Air Act

APCO Air Pollution Control Officer

ARB Air Resources Board

**BAAQMD** Bay Area Air Quality Management District

**BACT** Best Available Control Technology

**BARCT** Best Available Retrofit Control Technology

**Basis** The underlying authority that allows the District to impose requirements.

CAA The federal Clean Air Act

CAAQS California Ambient Air Quality Standards

CAPCOA California Air Pollution Control Officers Association

### CEM

A "continuous emission monitor" is a monitoring device that provides a continuous direct measurement of some pollutant (e.g. NOx concentration) in an exhaust stream.

### CEQA

California Environmental Quality Act

### CFR

The Code of Federal Regulations. 40 CFR contains the implementing regulations for federal environmental statutes such as the Clean Air Act. Parts 50-99 of 40 CFR contain the requirements for air pollution programs.

### CO

Carbon Monoxide

#### **Cumulative Increase**

The sum of permitted emissions from each new or modified source since a specified date pursuant to BAAQMD Rule 2-1-403, Permit Conditions (as amended by the District Board on 7/17/91) and SIP

Rule 2-1-403, Permit Conditions (as approved by EPA on 6/23/95). It is used to determine whether or not threshold-based requirements are triggered.

#### District

The Bay Area Air Quality Management District

#### DWT

Dead Weight Ton

#### dscf

Dry Standard Cubic Feet

#### E 6, E 9, E 12

Very large or very small number values are commonly expressed in a form called scientific notation, which consists of a decimal part multiplied by 10 raised to some power. For example, 4.53 E 6 equals (4.53) x ( $10^6$ ) = (4.53) x ( $10 \times 10 \times 10 \times 10 \times 10 \times 10)$  = 4,530,000. Scientific notation is used to express large or small numbers without writing out long strings of zeros.

### EPA

The federal Environmental Protection Agency

#### Excluded

Not subject to any District Regulations

#### Federally Enforceable, FE

All limitations and conditions which are enforceable by the Administrator of the EPA including those requirements developed pursuant to 40 CFR Part 51, subpart I (NSR), Part 52.21 (PSD), Part 60, (NSPS), Part 61, (NESHAPs), Part 63 (HAP), and Part 72 (Permits Regulation, Acid Rain), and also including limitations and conditions contained in operating permits issued under an EPA-approved program that has been incorporated into the SIP.

### FP

Filterable Particulate as measured by BAAQMD Method ST-15, Particulate.

**FR** Federal Register

GLM Ground Level Monitor

### grain

1/7000 of a pound

#### HAP

Hazardous Air Pollutant - Any pollutant listed pursuant to Section 112(b) of the Act. Also refers to the program mandated by Title I, Section 112, of the Act and implemented by both 40 CFR Part 63, and District Regulation 2, Rule 5.

### **Major Facility**

A facility with potential emissions of regulated air pollutants greater than or equal to 100 tons per year, greater than or equal to 10 tons per year of any single hazardous air pollutant, and/or greater than or equal to 25 tons per year of any combination of hazardous air pollutants, or such lesser quantity as determined by the EPA administrator.

### MFR

Major Facility Review - The District's term for the federal operating permit program mandated by Title V of the Act and implemented by District Regulation 2, Rule 6.

### MOP

The District's Manual of Procedures.

### MSDS

Material Safety Data Sheet

NA Not Applicable

### NAAQS

National Ambient Air Quality Standards

### **NESHAPs**

National Emission Standards for Hazardous Air Pollutants - Contained in 40 CFR Part 61 or 63.

### NMHC

Non-methane Hydrocarbons

### NMOC

Non-methane Organic Compounds (Same as NMHC)

### NOx

Oxides of nitrogen

### NSPS

Standards of Performance for New Stationary Sources - Federal standards for emissions from new stationary sources. Mandated by Title I, Section 111 of the Act, and implemented by both 40 CFR Part 60 and District Regulation 10.

### NSR

New Source Review - A federal program for pre-construction review and permitting of new and modified sources of air pollutants for which the District is classified "non-attainment". Mandated by Title I of the Clean Air Act and implemented by 40 CFR Parts 51 and 52 as well as District Regulation 2, Rule 2. (Note: There are additional NSR requirements mandated by the California Clean Air Act.)

### 02

The chemical name for naturally-occurring oxygen gas

### **Offset Requirement**

A New Source Review requirement to provide federally enforceable emission offsets at a specified ratio for the emissions from a new or modified source and any pre-existing cumulative increase minus any onsite contemporaneous emission reduction credits. This applies to emissions of POC, NOx, PM10, and SO2.

### Phase II Acid Rain Facility

A facility that generates electricity for sale through fossil-fuel combustion and by virtue of certain other characteristics (defined in Regulation 2, Rule 6) is subject to Titles IV and V of the Clean Air Act.

### POC

Precursor Organic Compounds

### PM

Total Particulate Matter

### PM10

Particulate matter with aerodynamic equivalent diameter of less than or equal to 10 microns

### PSD

Prevention of Significant Deterioration - A federal program for permitting new and modified sources of air pollutants for which the District is classified "attainment" of the National Air Ambient Quality Standards. Mandated by Title I of the Act and implemented by both 40 CFR Part 52 and District Regulation 2, Rule 2.

### SIP

State Implementation Plan - State and District programs and regulations approved by EPA and developed in order to attain the National Air Ambient Quality Standards. Mandated by Title I of the Act.

SO2

Sulfur dioxide

### THC

Total Hydrocarbons (NMHC + Methane)

### therm

100,000 British Thermal Unit

### Title V

Title V of the federal Clean Air Act. It requires a federally enforceable operating permit program for major and certain other facilities.

### TOC

Total Organic Compounds (NMOC + Methane, Same as THC)

#### TSP

Total Suspended Particulate

### TVP

True Vapor Pressure

### VOC

Volatile Organic Compounds

#### Units of Measure:

	bhp	=	brake-horsepo	wer
	btu	=	British Therm	al Unit
	С	=	degrees Celsiu	IS
	F	=	degrees Fahren	nheit
	$f^3$	=	cubic feet	
	g	=	grams	
	gr	=	grains	
	gal	=	gallon	
	gpm	=	gallons per mi	nute
	hp	=	horsepower	
	hr	=	hour	
	lb	=	pound	
	in	=	inches	
	М	=	thousand	
	max	=	maximum	
	m <sup>2</sup>	=	square meter	
	Mg	=	mega-gram, or	ne thousand grams
	μg	=	micro-gram, o	ne millionth of a gram
	min	=	minute	
	MM	=	million	
	mm	=	millimeter	
	MMbtu	=	million btu	
	mm Hg	=	millimeters of	Mercury (pressure)
	ppmv	=	parts per milli	on, by volume
	ppmw	=	parts per milli	on, by weight
	psia	=	pounds per sq	uare inch, absolute
	psig	=	pounds per sq	uare inch, gauge
	scfm	=	standard cubic	e feet per minute
	yr	=	year	
Sym	bols:			
	<		=	less than
	>		=	greater than
	< > < <b>&gt;</b>		=	less than or equal to
	<u>&gt;</u>		=	greater than or equal to