

BAE Systems
San Francisco Ship Repair
Foot of 20th Street
San Francisco, California 94107-3005
415-861-7447

BAE SYSTEMS

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SAN FRANCISCO AIR QUALITY
MANAGEMENT DISTRICT

Director of Compliance and Enforcement
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109
Attn: Title V Reports

Director of the Air Division
USEPA, Region IX
75 Hawthorne, Street
San Francisco, CA 94105
Attention: Air-3

Subject: Title V Semi-Annual Monitoring Report for period 06/01/2012 to 11/30/2012

BAE Systems San Francisco Ship Repair Inc. ("BAE Systems") herewith submits the Semi-Annual Report for Facility A3288. This report includes detailed reports and compliance reporting for the following sources for the Semi-Annual period between June 1, 2012 and November 30, 2012:

S1: Paint Spraying/Abrasive Blasting Operation
Status: Full Compliance

S2: Sandblasting Operation
Status: Full Compliance

S10: Paint Spray Booth
Status: Full Compliance

S12: Polyester Resin Operation, Hand Lay-up
Status: Full Compliance

S13: Emergency Standby Diesel Engine
Status: Full Compliance

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S14: Boiler, Electrical Generation
Status: Full Compliance [exempt]

S15: Emergency Standby Diesel Engine
Status: Full Compliance

S16: Abrasive Blasting Room
Status: Full Compliance

Compliance Certification

Based on information and belief formed after reasonable inquiry, the statements and information in this report and the attached Compliance Certification Report form are true, accurate, and complete.

Sincerely,



Hugh Vanderspek
General Manager
BAE Systems San Francisco Ship Repair Inc.
Facility #A3288

Cc: Shaun Halvax
Ken Peterson

[Enclosures]

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.

Table VII – A
S-1 Paint Spray/Abrasive Blasting Operation

Type of limit	Citation of Limit	FE Y/N	Compliance Status	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
Opacity	BAAQMD 6-1-301	N	In Compliance	Ringelmann #1 Limitation for < 3 minutes/hour	BAAQMD Condition #3419, Part 3	P/E	Visible Emission Checks
Opacity	SIP 6-301	Y	In Compliance	Ringelmann #1 Limitation for < 3 minutes/hour	BAAQMD Condition #3419, Part 3	P/E	Visible Emission Checks
VOC	BAAQMD 8-43-301.2	Y	In Compliance	General coating: air dried 2.8 lbs VOC/gal*	BAAQMD 8-43-501	P/D	Records
VOC	BAAQMD 8-43-302.1	Y	In Compliance	Anti-foulant coating: 3.3 lbs VOC/gal*	BAAQMD 8-43-501	P/D	Records
VOC	BAAQMD 8-43-302.2	Y	In Compliance	Heat Resistant coating: 3.5 lbs VOC/gal*	BAAQMD 8-43-501	P/D	Records
VOC	BAAQMD 8-43-302.7	Y	In Compliance	Pretreatment Wash Primer: 3.5 lbs VOC/gal*	BAAQMD 8-43-501	P/D	Records
VOC	BAAQMD 8-43-302.9	Y	In Compliance	Military Exterior Topcoat: 2.8 lbs VOC/gal*	BAAQMD 8-43-501	P/D	Records
VOC	BAAQMD 8-43-302.10	Y	In Compliance	Specialty Interior coating: 2.8 lbs VOC/gal*	BAAQMD 8-43-501	P/D	Records
VOC	BAAQMD 8-43-302.12	Y	In Compliance	Special Marking coating: 4.1 lbs VOC/gal*	BAAQMD 8-43-501	P/D	Records

Table VII – A
S-1 Paint Spray/Abrasive Blasting Operation

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

* Excluding water and exempt solvents

Table VII - B
S-2 Sandblasting operation

Type of Limit	Citation of Limit	FE Y/N	Compliance Status	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
Opacity	BAAQMD 6-1-301	N	In Compliance	Ringelmann #1 Limitation for < 3 minutes/hour	BAAQMD Condition #3420, Part 1	P/E	Visible Emissions Checks
Opacity	SIP 6-301	Y	In Compliance	Ringelmann #1 Limitation for < 3 minutes/hour	BAAQMD Condition #3420, Part 1	P/E	Visible Emissions Checks

Table VII - C
S-10 Paint Spray Booth

Type of Limit	Citation of limit	FE Y/N	Compliance Status	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD 8-43-301.2	Y	In Compliance	General coating: air dried 2.8 lbs VOC/gal*	BAAQMD 8-43-501	P/D	Records
	BAAQMD 8-43-302.1	Y	In Compliance	Anti-foulant coating: 3.3 lbs VOC/gal*	BAAQMD 8-43-501	P/D	Records
	BAAQMD 8-43-302.2	Y	In Compliance	Heat Resistant coating: 3.5 lbs VOC/gal*	BAAQMD 8-43-501	P/D	Records
	BAAQMD 8-43-302.7	Y	In Compliance	Pretreatment Wash Primer: 3.5 lbs VOC/gal*	BAAQMD 8-43-501	P/D	Records
	BAAQMD 8-43-302.9	Y	In Compliance	Military Exterior Topcoat: 2.8 lbs VOC/gal*	BAAQMD 8-43-501	P/D	Records
	BAAQMD 8-43-302.10	Y	In Compliance	Specialty Interior coating: 2.8 lbs VOC/gal*	BAAQMD 8-43-501	P/D	Records
	BAAQMD 8-43-302.12	Y	In Compliance	Special Marking coating: 4.1 lbs VOC/gal*	BAAQMD 8-43-501	P/D	Records
	BAAQMD 8-43-321	Y	In Compliance	Surface Preparation Solvent 0.42 lbs/gal	BAAQMD 8-43-501	P/D	Records
	Condition #7887, Part 1	Y	In Compliance	Emission Limit 22.5 TPY	BAAQMD Condition # 7887, Part 7	P/D	Records
	Condition #7887, Part 2	Y	In Compliance	Emission Limit 140 lb/day	BAAQMD Condition # 7887, Part 7	P/D	Records
	Condition #7887, Part 3	Y	In Compliance	Coating Usage Limit 12,600 gal/yr	BAAQMD Condition # 7887, Part 7	P/D	Records
	Condition #7887, Part 4	Y	In Compliance	Coating Usage Limit 40 gal/day	BAAQMD Condition # 7887, Part 7	P/D	Records
VOC	Condition #7887, Part 5	Y	In Compliance	Solvent Usage Limit 1,385 gal/yr	BAAQMD Condition # 7887, Part 7	P/D	Records

Table VII - C
S-10 Paint Spray Booth

Type of Limit	Citation of limit	FE Y/N	Compliance Status	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
	Condition #7887, Part 6	Y	In Compliance	Solvent Usage Limit 4 gal/day	BAAQMD Condition # 7887, Part 7	P/D	Records
	40 CFR 63.783a, Table 2, Subpart II	Y	In Compliance	General Coating 2.83 lbs VOC/gal*	40 CFR 63.788	P/M	Records
	40 CFR 63.783a, Table 2, Subpart II	Y	In Compliance	Antifoulant Coating 3.33 lbs VOC/gal*	40 CFR 63.788	P/M	Records
	40 CFR 63.783a, Table 2, Subpart II	Y	In Compliance	Pretreatment Wash Primer 6.50 lbs VOC/gal*	40 CFR 63.788	P/M	Records
	40 CFR 63.783a, Table 2, Subpart II	Y	In Compliance	Special Marking Coating 4.08 lbs VOC/gal*	40 CFR 63.788	P/M	Records
	40 CFR 63.783a, Table 2, Subpart II	Y	In Compliance	Military Exterior Coating 2.83 lbs VOC/gal*	40 CFR 63.788	P/M	Records
	40 CFR 63.783a, Table 2, Subpart II	Y	In Compliance	Nonskid Coating 2.83 lbs VOC/gal*	40 CFR 63.788	P/M	Records
	40 CFR 63.783a, Table 2, Subpart II	Y	In Compliance	Specialty Interior Coating 2.83 lbs VOC/gal*	40 CFR 63.788	P/M	Records

* Excluding water and exempt solvents

Table VII - D
S-12 Polyester Resin Operation

Type of Limit	Citation of Limit	FE Y/N	Compliance Status	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD 8-50-301.1	Y	In Compliance	Monomer content ≤ 35% by wt.	BAAQMD 8-43-501	P/D	Records
	BAAQMD 8-50-305.4	Y	In Compliance	Cleanup material 1.70 lbs VOC/gal	BAAQMD 8-43-501	P/D	Records
	Condition #17063, Part 1	Y	In Compliance	Resin Usage 200 gal/yr	BAAQMD Condition #17063, Part 3	P/D	Records
	Condition #17063, Part 2	Y	In Compliance	Solvent Usage 10 gal/yr	BAAQMD Condition #17063, Part 3	P/D	Records

Table VII - E
S-13 Auxiliary Harbor Craft Prime Diesel Engine, Dry Dock #2

Type of Limit	Citation of Limit	FE Y/N	Compliance Status	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
Opacity	BAAQMD 6-1-303.1	N	In Compliance	Ringelmann #2 Limitation for < 3 minutes/hour	None	N	N/A
Opacity	SIP6-303.1	Y	In Compliance	Ringelmann #2 Limitation for < 3 minutes/hour	None	N	N/A
FP	BAAQMD 6-1-310	N	In Compliance	0.15 gr/dscf	None	N	N/A
FP	SIP 6-310	Y	In Compliance	0.15 gr/dscf	None	N	N/A
SO2	BAAQMD 9-1-301	Y	In Compliance	Ground Level Concentration ≤ 0.5 ppm continuously for 3 minutes ≤ 0.25 ppm averaged over 60 minutes ≤ 0.05 ppm averaged over 24 hours	None	N	N/A
Hours of operation	BAAQMD Condition #24809, part 1	Y	In Compliance	Hours of operation for any purpose not to exceed 80 hours per year	BAAQMD Condition #24809, part 3	P/M	Records

Table VII - F
S-15 Prime Diesel Generator Engine, (Eureka Dry Dock)

Type of Limit	Citation of Limit	FE Y/N	Compliance Status	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
Opacity	BAAQMD 6-1-303.1	N	In Compliance	Ringelmann #2 Limitation for < 3 minutes/hour	None	N	N/A
Opacity	SIP 6-303.1	Y	In Compliance	Ringelmann #2 Limitation for < 3 minutes/hour	None	N	N/A
FP	BAAQMD 6-1-310	N	In Compliance	0.15 gr/dscf	None	N	N/A
FP	SIP 6-310	Y	In Compliance	0.15 gr/dscf	None	N	N/A
SO2	BAAQMD 9-1-301	Y	In Compliance	Ground Level Concentration ≤ 0.5 ppm continuously for 3 minutes ≤ 0.25 ppm averaged over 60 minutes ≤ 0.05 ppm averaged over 24 hours	None	N	N/A
Hours of operation	BAAQMD Condition # 24810, part 1	Y	In Compliance	Hours of operation for any purpose not to exceed 20 hours per year	BAAQMD Condition # 24810, part 4	P/M	Records

Table VII - G
S-16 Abrasive Blast Room with Pneumatic Recovery System

Type of Limit	Citation of Limit	FE Y/N	Compliance Status	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
Opacity	BAAQMD 6-1-301	N	In Compliance	Ringelmann #1 Limitation for < 3 minutes/hour	BAAQMD Condition #3420, Part 1	P/E	Visible Emissions Checks
Opacity	SIP 6-301	Y	In Compliance	Ringelmann #1 Limitation for < 3 minutes/hour	BAAQMD Condition #3420, Part 1	P/E	Visible Emissions Checks
FP	BAAQMD 6-1-310	N	In Compliance	0.15 gr/dscf	None	N	
FP	SIP 6-310	Y	In Compliance	0.15 gr/dscf	None	N	
FP	BAAQMD 6-1-311	N	In Compliance	3.05 lb/hr	None	N	
FP	SIP 6-311	Y	In Compliance	3.05 lb/hr	None	N	
FP	BAAQMD Condition #23507, part 4	Y	In Compliance	0.002 gr/dscf	BAAQMD Condition #23507, part 8	P/W	Manometer reading
Hours of operation	BAAQMD Condition #23507, part 2	Y	In Compliance	2,900 hours per year for anti-foulant coating, 30 minutes per hour for ABC #3 coating	BAAQMD Condition #23507, part 6	P/D	Record-keeping
Pressure Drop	BAAQMD Condition #23507, part 8	Y	In Compliance	Pressure drop range: 0.5 to 6.0 inches water column	BAAQMD Condition #23507, part 9	P/W	Manometer reading
Abrasive throughput	BAAQMD Condition #23507, part 4		In Compliance	750,000 pounds per consecutive twelve month period	BAAQMD Condition #23507, part 6	P/M	Record-keeping