Bay Area Air Quality Management District

939 Ellis Street San Francisco, CA 94109 (415) 771-6000

Final

MAJOR FACILITY REVIEW PERMIT

Issued To: San Francisco Drydock, Inc. Facility #A3288

Facility Address:

Foot of 20th Street San Francisco, CA 94120

Mailing Address:

P. O. Box 7644 San Francisco, CA 94120

Responsible Official

D. Carl Hanson, President (858) 238-1000

Ellen Garvey, Executive Officer/Air Pollution Control Officer

Facility Contact

Rich Morales, Environmental Manager (415) 861-7447

Date

T. 45 W.	gr. p F. W	
Type of Facility:	Ship Repair Facility	BAAQMD Permit Division Contact:
Primary SIC:	3731	Allan Chiu
Product:	Ship Repair	
ISSUED BY THE	BAY AREA AIR QUALITY I	MANAGEMENT DISTRICT
Signed by Ellen Garv	/ey	6/1/00

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Facility Name: San Francisco Drydock Inc.

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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 10/7/98);

SIP Regulation 1 - General Provisions and Definitions

(as approved by EPA through 8/27/99);

BAAQMD Regulation 2, Rule 1 - Permits, General Requirements

(as amended by the District Board on 10/7/98);

SIP Regulation 2, Rule 1 - Permits, General Requirements

(as approved by EPA through 2/25/99);

BAAQMD Regulation 2, Rule 2 - Permits, New Source Review

(as amended by the District Board on 10/7/98);

SIP Regulation 2, Rule 2 - Permits, New Source Review and Prevention of Significant Deterioration

(as approved by EPA through 2/25/99);

BAAQMD Regulation 2, Rule 4 - Permits, Emissions Banking

(as amended by the District Board on 10/7/98); and

SIP Regulation 2, Rule 4 - Permits, Emissions Banking

(as approved by EPA through 2/25/99).

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

(as amended by the District Board on 10/20/99).

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

- 1. This Major Facility Review Permit was issued on June 1, 2000, and expires on May 31, 2005. The permit holder shall submit a complete application for renewal of this Major Facility Review Permit no later than November 30, 2004, and no earlier than May 31, 2004. **If a complete application for renewal has not been submitted in accordance with these deadlines, the facility may not operate after** May 31, 2005. (Regulation 2-6-307, 404.2, & 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)
- 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)

Facility Name: San Francisco Drydock Inc.

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I. Standard Conditions

5. The filing of a request by the facility for a permit modification, revocation and reissuance, or termination, or 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 contain 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 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 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)

C. Requirement to Pav 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)

D. Inspection and Entry

Access to Facility: The permit holder shall provide reasonable access to the facility and equipment which 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

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, Regulation 3; 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. The first reporting period for this permit

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I. Standard Conditions

shall be June 1, 2000, to November 30, 2000. The report shall be submitted by December 31, 2000. Subsequent reports shall be for the following periods: December 1st through May 31st and June 1st through November 30th, 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 to the following address:

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

(Regulation 2-6-502, Regulation 3; 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 30th 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 permit holder may satisfy this requirement through submittal of District-generated Compliance Certification forms. The certification should be directed to the District's Compliance and Enforcement Division at the address above, and a copy of the certification should be sent to the Environmental Protection Agency at the following address:

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

(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

I. Standard Conditions

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 caused by conditions beyond the permit holder's reasonable control 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. Any variance granted by the Hearing Board from any term or condition of this permit which lasts longer than 90 days will be subject to EPA approval. (MOP Volume II, Part 3, §4.8)
- 3. Notwithstanding the foregoing, 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)

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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.

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-4	Cold Cleaner	Safety-Kleen	Model 30	20 gallon
S-5	Cold Cleaner	Safety-Kleen	Model 30	20 gallon
S-10	Paint Spray Booth	Custom	N/A	17000 cfm
S-12	Polyester Resin Operation	Custom	N/A	200 gal/yr

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.

The dates in parenthesis 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
- 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 included in Appendix A of this permit if the SIP requirement is different from the current BAAQMD requirement.

NOTE:

There are differences between the current BAAQMD rule and the version of the rule in the SIP. For specific information, contact the District's Rule Development Section of the Enforcement Division. 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.

Table III
Generally Applicable Requirements

		Federally
Applicable	Regulation Title or	Enforceable
Requirement	Description of Requirement	(Y/N)
BAAQMD Regulation 1	General Provisions and Definitions (10/7/98)	N
SIP Regulation 1	General Provisions and Definitions (8/27/99)	Y
BAAQMD Regulation 4	Air Pollution Episode Plan (3/20/91)	N
SIP Regulation 4	Air Pollution Episode Plan (8/06/90)	Y

III. Generally Applicable Requirements

Table III Generally Applicable Requirements

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)
BAAQMD Regulation 5	Open Burning (11/2/94)	N
BAAQMD Regulation 6	Particulate Matter and Visible Emissions (12/19/90)	N
BAAQMD Regulation 7	Odorous Substances (3/17/82)	N
BAAQMD Regulation 8, Rule 1	Organic Compounds - General Provisions (6/15/94)	Y
BAAQMD Regulation 8, Rule 3	Organic Compounds - Architectural Coatings (5/15/96)	Y
BAAQMD Regulation 8, Rule 4	Organic Compounds - General Solvent and Surface Coating Operation (5/15/96)	Y
BAAQMD Regulation 8, Rule 49	Organic Compounds - Aerosol Paint Products (12/20/95)	N
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 (12/20/95)	N
BAAQMD Regulation 11, Rule 2	Hazardous Pollutants - Asbestos Demolition, Renovation and Manufacturing (12/4/91)	Y
BAAQMD Regulation 12, Rule 4	Miscellaneous Standards of Performance - Sandblasting (7/11/90)	Y

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 parenthesis 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
- 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 language of SIP requirements is included in Appendix A of this permit if the SIP requirements are different from the current BAAQMD requirements. All other text may be found in the regulations themselves.

Table IV - A
Source-specific Applicable Requirements
S-1 PAINT SPRAYING/ABRASIVE BLASTING OPERATION

Applicable Requirement BAAQMD Regulation 6, Rule 1	Regulation Title or Description of Requirement Particulate matter and Visible Emissions	Federally Enforceable (Y/N)	Future Effective Date
6-301	Ringelmann No. 1 Limitation	Y	
6-305	Visible Particles	Y	
6-310	Particulate Weight Limitation	Y	
6-311	Process Weight Rate Limitation	Y	
6-401	Appearance of Emissions	Y	
BAAQMD Regulation 8, Rule 43	Organic Compounds - Surface Coating of Marine Vessels (12/20/95)		
8-43-301	Limits	Y	
8-43-301.2	Air-Dried Coatings	Y	

Table IV - A Source-specific Applicable Requirements S-1 PAINT SPRAYING/ABRASIVE BLASTING OPERATION

		Federally	Future
Applicable	Regulation Title or	Enforceable	Effective
Requirement	Description of Requirement	(Y/N)	Date
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	Surface Preparation & Cleanup Solvent	Y	
8-43-501	Coating Records	Y	
40 CFR 63,	National Emission Standards for Shipbuilding and Ship Repair		
Subpart II	(Surface Coating) (12/15/95)		
63.783(a)	Standards	Y	
63.783(b)	Handling and storage	Y	
63.785	Compliance Procedures	Y	
63.786	Test Methods and Procedures	Y	
63.787	Notification Requirements	Y	
63.788	Recordkeeping and Reporting Requirements	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			

Table IV - A Source-specific Applicable Requirements S-1 PAINT SPRAYING/ABRASIVE BLASTING OPERATION

		Federally	Future
Applicable	Regulation Title or	Enforceable	Effective
Requirement	Description of Requirement	(Y/N)	Date
BAAQMD	Operating Requirement		
Condition			
#3419			
Part 1	Particulate Control (basis: Reg. 6-305)	Y	
Part 2	Paint Spray Monitor (basis: Reg. 6-305)	Y	
Part 3	Recordkeeping (basis: cumulative increase)	Y	

Table IV - B
Source-specific Applicable Requirements
S-2 SANDBLASTING OPERATION

		Federally	Future
Applicable	Regulation Title or	Enforceable	Effective
Requirement	Description of Requirement	(Y/N)	Date
BAAQMD	Particulate matter and Visible Emissions		
Regulation			
6, Rule 1			
6-301	Ringelmann No. 1 Limitation	Y	
6-305	Visible Particles	Y	
6-310	Particulate Weight Limitation	Y	
6-311	Process Weight Rate Limitation	Y	
6-401	Appearance of Emissions	Y	
BAAQMD	Operating Requirement		
Condition			
#3420			
Part 1	Visible Emissions Monitoring (basis: Reg. 6-305)	Y	
Part 2	Recordkeeping (basis: cumulative increase)	Y	

Table IV - C Source-specific Applicable Requirements S-4, S-5 COLD CLEANERS

		Federally	Future
Applicable	Regulation Title or	Enforceable	Effective
Requirement	Description of Requirement	(Y/N)	Date
BAAQMD	Organic Compounds – Solvent Cleaning Operations (9/16/98)		
Regulation 8,			
Rule 16			
8-16-303	Cold Cleaner Requirements	Y	
8-16-303.1	General Operating Requirements	Y	
8-16-303.2	Cold Cleaner Operating Requirements	N	
8-16-303.3	Cold Cleaner General Equipment Requirements	N	
8-43-303.4	Cold Cleaner Control Devices	N	
8-16-501	Solvent Records	Y	
8-16-501.2	Facility-wide, annual records of makeup solvent use	Y	
8-16-501.4	Monthly makeup solvent use at enclosed solvent cleaners	N	
8-16-501.5	Record retention	N	
SIP	Organic Compounds – Solvent Cleaning Operations (6/15/94)		
Regulation 8,			
Rule 16			
8-16-303	Cold Cleaner Requirements	Y	
8-16-303.1	General Operating Requirements	Y	
8-16-501	Solvent Records	Y	
8-16-501.2	Facility-wide, quarterly records of makeup solvent use	Y	
BAAQMD	Organic Compounds		
Condition			
#3421			
Part 1	Throughput Limit (basis: cumulative increase)	Y	
Part 2	Recordkeeping (basis: Reg. 8-16-501)	Y	

Table IV - D
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 Coating of Marine Vessels (12/20/95)		
Regulation 8,			
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	Surface Preparation & Cleanup Solvent	Y	
8-43-501	Coating Records	Y	
40 CFR 63,	National Emission Standards for Shipbuilding and Ship Repair		
Subpart II	(Surface Coating) (12/15/95)		
63.783(a)	Standards	Y	
63.783(b)	Handling and storage	Y	
63.785	Compliance Procedures	Y	
63.786	Test Methods and Procedures	Y	
63.787	Notification Requirements	Y	
63.788	Recordkeeping and Reporting Requirements	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			

Table IV - D Source-specific Applicable Requirements S-10 PAINT SPRAY BOOTH

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
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 #7887	Organic Compounds		
Part 1	VOC Emissions Limit (basis: cumulative increase)	Y	
Part 2	VOC Emissions Limit (basis: cumulative increase)	Y	
Part 3	Throughput Limit (basis: cumulative increase)	Y	
Part 4	Throughput Limit (basis: cumulative increase)	Y	
Part 5	Throughput Limit (basis: cumulative increase)	Y	
Part 6	Throughput Limit (basis: cumulative increase)	Y	
Part 7	Recordkeeping (basis: Reg. 8-43-501)	Y	

IV. Source-Specific Applicable Requirements

Table IV - E Source-specific Applicable Requirements S-12 POLYESTER RESIN OPERATION

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	
8-50-302	Spraying Operations	Y	
8-50-305	Surface Preparation and Clean-up Solvent	Y	
8-50-501	Records	Y	
BAAQMD Condition #17063	Organic Compounds		
Part 1	Throughput Limit (basis: cumulative increase)	Y	
Part 2	Throughput Limit (basis: cumulative increase)	Y	
Part 3	Recordkeeping (basis: 8-50-501)	Y	

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.

VI. PERMIT CONDITIONS

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

A. Source Specific Permit conditions

Condition #3419

For S-1 Paint Spraying/Abrasive Blasting Operation

- 1. Tarp, curtains, and shrouding shall be use at all times during paint spray or abrasive blasting operations. (basis: Reg. 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: Reg. 6- 305)
- 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: Reg. 6-305)
- 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: 8-43-501)

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VI. Permit Conditions

Condition #3420

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: Reg. 6-305)
- 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: Cumulative Increase)

Condition #3421

For S-4 & S-5 Cold Cleaner

- 1. The total annual net usage of solvent at S-4 or S-5 shall not exceed 150 gallons per source. (basis: Cumulative Increase)
- 2. The monthly net usage of solvent at S-4 and S-5 shall be recorded separately 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: Recordkeeping)

Condition #7887

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 rolling 365 consecutive day 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 rolling 24 consecutive hour period. (basis:

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VI. Permit Conditions

Cumulative Increase)

Condition #7887

For S-10 Paint Spray Booth

- 3. The total usage of coating at S-10 shall not exceed 12,600 gallons in any rolling 365 consecutive day period. (basis: Cumulative Increase)
- 4. The total usage of coating at S-10 shall not exceed 40 gallons in any rolling 24 consecutive hour period. (basis: Cumulative Increase)
- 5. The total usage of cleanup solvent shall not exceed 1385 gallons in any rolling 365 consecutive day period. (basis: Cumulative Increase)
- 6. The total usage of cleanup solvent shall not exceed 4 gallons in any rolling 24 consecutive hour period. (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: Reg. 8-43-501)

Condition #17063

For S-12 Polyester resin Operation

- 1. 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)
- 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. (basis: Recordkeeping)

VI. Permit Conditions

a) The type, monomer content, amount of polyester resin, and solvent used monthly.

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, either 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.

Table VII – A

Applicable Limits and Compliance Monitoring Requirements
S-1 PAINT SPRAY/ABRASIVE BLASTING OPERATION

Type of	Emission Limit	FE	Future Effective		Monitoring Requirement	Monitoring Frequency	Monitoring
limit	Citation	Y/N	Date	Emission Limit	Citation	(P/C/N)	Type
VOC	BAAQMD	Y		General coating: air	BAAQMD	P/D	Records
	8-43-301.2			dried 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	BAAQMD	P/D	Records
	8-43-302.7			Primer: 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		
VOC	BAAQMD	Y		Special Marking coating:	BAAQMD	P/D	Records
	8-43-302.12			4.1 lbs VOC/gal	8-43-501		
VOC	40 CFR 63.783	Y		General Coating	40 CFR	P/M	Records
	Table 2			2.83 lbs VOC/gal	63.788		
	Subpart II						

Table VII – A

Applicable Limits and Compliance Monitoring Requirements
S-1 PAINT SPRAY/ABRASIVE BLASTING OPERATION

	Emission		Future		Monitoring	Monitoring	
Type of	Limit	FE	Effective		Requirement	Frequency	Monitoring
limit	Citation	Y/N	Date	Emission Limit	Citation	(P/C/N)	Type
VOC	40 CFR 63.783	Y		Antifoulant Coating	40 CFR	P/M	Records
	Table 2			3.33 lbs VOC/gal	63.788		
	Subpart II						

Table VII – A

Applicable Limits and Compliance Monitoring Requirements
S-1 PAINT SPRAY/ABRASIVE BLASTING OPERATION

Type of	Emission Limit	FE	Future Effective		Monitoring Requirement	Monitoring Frequency	Monitoring
limit	Citation	Y/N	Date	Emission Limit	Citation	(P/C/N)	Type
VOC	40 CFR 63.783	Y		Pretreatment Wash	40 CFR	P/M	records
	Table 2			Primer	63.788		
	Subpart II			6.50 lbs VOC/gal			
VOC	40 CFR 63.783	Y		Special Marking Coating	40 CFR	P/M	records
	Table 2			4.08 lbs VOC/gal	63.788		
	Subpart II						
VOC	40 CFR 63.783	Y		Military Exterior Coating	40 CFR	P/M	records
	Table 2			2.83 lbs VOC/gal	63.788		
	Subpart II						
VOC	40 CFR 63.783	Y		Nonskid Coating	40 CFR	P/M	records
	Table 2			2.83 lbs VOC/gal	63.788		
	Subpart II						
VOC	40 CFR 63.783	Y		Specialty Interior	40 CFR	P/M	records
	Table 2			Coating	63.788		
	Subpart II			2.83 lbs VOC/gal			
TSP	BAAQMD	Y		Ringelmann #1	BAAQMD	P/E	visible
	6-301			Limitation	Condition		emissions
					#3419, Part 3		checks
TSP	BAAQMD	Y		Visible Particles	BAAQMD	P/D	records
	6-305				Condition		
					#3419, Part 2		

 $\begin{tabular}{ll} Table\ VII\ -\ B\\ Applicable\ Limits\ and\ Compliance\ Monitoring\ Requirements\\ S\ -2\ SANDBLASTING\ OPERATION \end{tabular}$

	Emission		Future		Monitoring	Monitoring	
Type of	Limit	FE	Effective		Requirement	Frequency	Monitoring
limit	Citation	Y/N	Date	Emission Limit	Citation	(P/C/N)	Type
TSP	BAAQMD	Y		Ringelmann #1	BAAQMD	P/E	visible
	6-301			Limitation	Condition		emissions
					#3420, Part 1		checks
TSP	BAAQMD	Y		Visible Particles	BAAQMD	P/E	visible
	6-305				Condition		emissions
					#3420, Part 1		checks

Table VII - C
Applicable Limits and Compliance Monitoring Requirements
S-4, S-5 COLD CLEANER

Type of	Emission Limit	FE	Future Effective		Monitoring Requirement	Monitoring Frequency	Monitoring
limit	Citation	Y/N	Date	Emission Limit	Citation	(P/C/N)	Type
VOC	Condition	Y		Usage limit of 150	BAAQMD	P/D	records
	#3421, Part 1			gal/yr for each cold	Condition		
				cleaners	#3421, Part 2		

Table VII - D
Applicable Limits and Compliance Monitoring Requirements
S-10 PAINT SPRAY BOOTH

	Emission		Future		Monitoring	Monitoring	
Type of	Limit	FE	Effective		Requirement	Frequency	Monitoring
limit	Citation	Y/N	Date	Emission Limit	Citation	(P/C/N)	Type
VOC	BAAQMD	Y		General coating: air	BAAQMD	P/D	records
	8-43-301.2			dried	8-43-501		
				2.8 lbs VOC/gal			
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	BAAQMD	P/D	records
	8-43-302.7			Primer: 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		
VOC	BAAQMD	Y		Special Marking coating:	BAAQMD	P/D	records
	8-43-302.12			4.1 lbs VOC/gal	8-43-501		
VOC	Condition	Y		Emission Limit 22.5 TPY	BAAQMD	P/D	record
	#7887, Part 1				Condition #		
					7887, Part 7		
VOC	Condition	Y		Emission Limit 140	BAAQMD	P/D	record
	#7887, Part 2			lb/day	Condition #		
					7887, Part 7		
VOC	Condition	Y		Usage Limit 12,600	BAAQMD	P/D	record
	#7887, Part 3			gal/yr	Condition #		
					7887, Part 7		
VOC	Condition	Y		Usage Limit 40 gal/day	BAAQMD	P/D	record
	#7887, Part 4				Condition #		
					7887, Part 7		
VOC	Condition	Y		Usage Limit 1,385 gal/yr	BAAQMD	P/D	record
	#7887, Part 5				Condition #		
					7887, Part 7		

Table VII - D
Applicable Limits and Compliance Monitoring Requirements
S-10 PAINT SPRAY BOOTH

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

Table VII - E
Applicable Limits and Compliance Monitoring Requirements
S-12 POLYESTER RESIN OPERATION

Type of	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	BAAQMD 8-50-301.1	Y	2 000	35% by wt.	BAAQMD 8-43-501	P/D	records
VOC	BAAQMD 8-50-305.4	Y		1.70 lbs VOC/gal	BAAQMD 8-43-501	P/D	records
VOC	Condition #17063, Part 1	Y		Usage limit of 200 gal/yr	BAAQMD Condition #17063, Part	P/D	records
VOC	Condition #17063, Part 2	Y		Usage limit of 10 gal/yr	BAAQMD Condition #17063, Part	P/D	records

VIII. TEST METHODS

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

Table VIII Test Methods

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

Facility Name: San Francisco Drydock Inc.

Permit for Facility #: A3288

IX. GLOSSARY

BAAQMD

Bay Area Air Quality Management District

BACT

Best Available Control Technology

CAA

The federal Clean Air Act

CAAQS

California Ambient Air Quality Standards

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.

\mathbf{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). Used to determine whether threshold-based requirements are triggered.

District

The Bay Area Air Quality Management District

EPA

The federal Environmental Protection Agency.

Excluded

Not subject to any District Regulations.

Facility Name: San Francisco Drydock Inc.

Permit for Facility #: A3288

X. Glossary

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.

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.

NAAQS

National Ambient Air Quality Standards

NESHAPs

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

NMHC

Non-methane Hydrocarbons

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.

X. Glossary

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.)

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. 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

X. Glossary

Sulfur dioxide

Title V

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

TSP

Total Suspended Particulate

VOC

Volatile Organic Compounds

Units of Measure:

bhp	=	brake-horsepower
btu	=	British Thermal Unit
g	=	grams
gal	=	gallon
hp	=	horsepower
hr	=	hour
lb	=	pound
in	=	inches
max	=	maximum
m^2	=	square meter
min	=	minute
mm	=	million
ppmv	=	parts per million, by volume
ppmw	=	parts per million, by weight
psia	=	pounds per square inch, absolute
psig	=	pounds per square inch, gauge
scfm	=	standard cubic feet per minute
yr	=	year

X. APPLICABLE STATE IMPLEMENTATION PLAN

See Attachments