

Puget Sound Clean Air Agency

110 Union Street, Suite 500, Seattle, WA 98101-2038: Larry Vaughn (206) 689-4035

Emission Report
September 27, 2002

TODD PACIFIC SHIPYARDS CORP

Facility ID #: 12539
EPA#: 033-125

2001 Air Contaminant Emission Summary

(From last year's Emission Report; fees based on tons/year)

<u>CAS#</u>	<u>Flags</u>	<u>Air Contaminants:</u>	<u>pounds/2001</u>	<u>tons /2001</u>
71-55-6	TH	1,1,1-Trichloroethane (Methyl chloroform)	565	<1
78-93-3	VTH	2-Butanone (MEK; Methyl ethyl ketone)	209	<1
110-80-5	VTH	2-Ethoxyethanol (Cellosolve) [glycol ether]	1,067	<1
CO		Carbon Monoxide (CO)	974	<1
141-78-6	VT	Ethyl acetate	289	<1
64-17-5	VT	Ethyl alcohol (Ethanol)	19	<1
100-41-4	VTH	Ethyl benzene	36	<1
60-29-7	VT	Ethyl ether	39	<1
78-83-1	VT	Isobutyl alcohol	2,730	1
108-10-1	VTH	Methyl isobutyl ketone (MIBK; Hexone)	429	<1
110-43-0	VT	Methyl n-amyl ketone	6,447	3
91-20-3	VTH	Naphthalene	697	<1
NO2		Nitrogen Oxides (NO2)	4,481	2
43207	V	Other Volatile Organic Compounds (VOC)	4,049	2
PM10		Particulate Matter (PM10)	3,034	2
PM2.5		Particulate Matter (PM2.5)	1,268	<1
108-95-2	VTH	Phenol	73	<1
SO2		Sulfur Oxides (SO2)	21	<1
108-88-3	VTH	Toluene	961	<1
8032-32-4	VT	VM & P Naphtha	284	<1
1330-20-7	VTH	Xylenes	8,506	4
123-86-4	VT	n-Butyl acetate	2,395	1
71-36-3	VT	n-Butyl alcohol	12,880	6
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		Volatile Organic Compounds Total (V)	41,110	21
		Toxic Air Contaminants Total (T)	37,626	19
		Hazardous Air Pollutants Total (H)	12,543	6

Emission Point/Segment Summary

Point 001 External Combustion Industrial

Segment 01 Natural Gas

Point 002 Surface Coating Operations

Segment 01 Paint: Solvent Based Epoxy Paints

Segment 02 Paint: Solvent Based Epoxy #E5806

Segment 03 Paint: Solvent Based Epoxy #5804/5805

Todd Pacific Shipyard



Puget Sound Air Pollution Control Agency

Notice of Construction No. 2277
Date JUL 23 1981

HEREBY GRANTS
PERMISSION TO CONSTRUCT, INSTALL, OR ESTABLISH

One Birks Model NPB 12-10-T-LH paint spray booth at 15,000 cfm with Nopump Dynaprecipitor unit

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Mr. Ronald J. Dedinas
Williams & Abbott Construction, Inc.
NAME
14712 Bothell Way N.E.
STREET
Seattle, WA 98155
CITY STATE ZIP

Todd Pacific Shipyard
NAME
1801 - 16th S.W.
STREET
Seattle, WA 98134
CITY STATE ZIP

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INSTALLATION ADDRESS

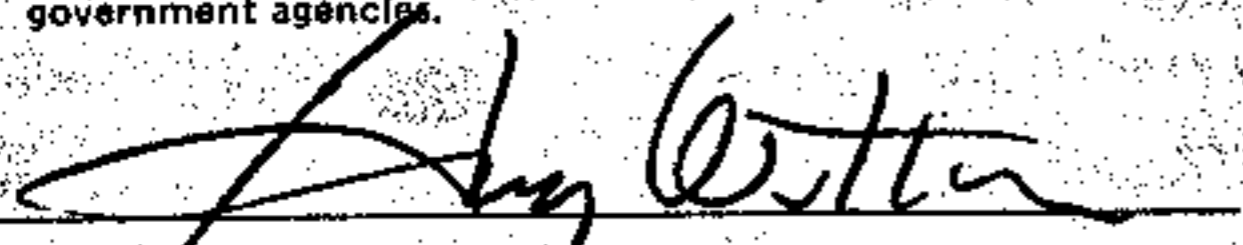
1801 - 16th Avenue S.W., Seattle, WA 98134
STREET CITY STATE ZIP

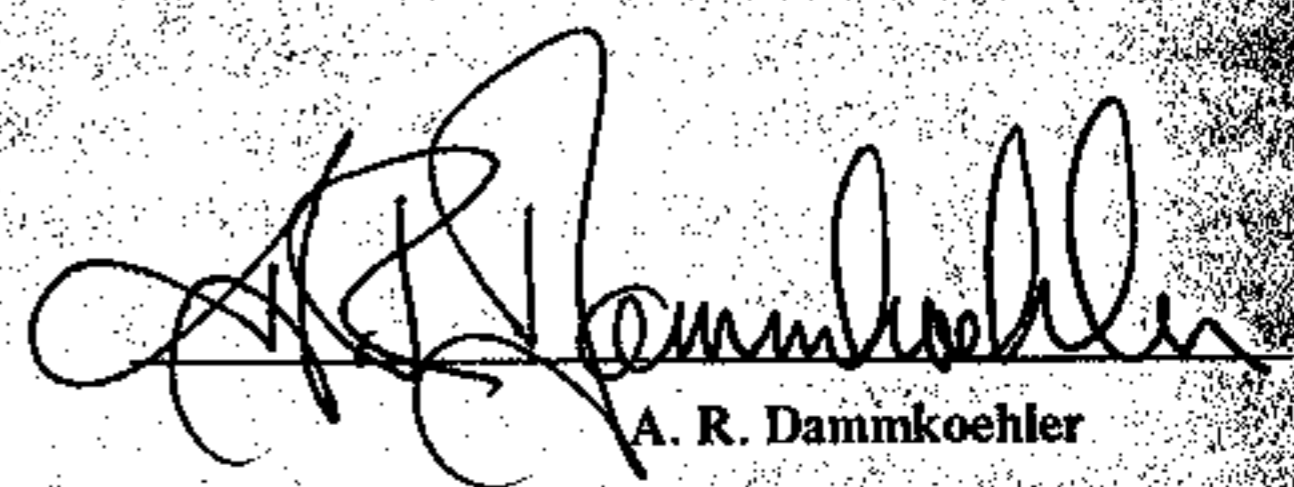
SUBJECT TO THE FOLLOWING RESTRICTIONS

GENERAL

Permission is hereby granted as provided in Article 6 of Regulation I of the PSAPCA to the APPLICANT to install, alter, or establish the equipment, device, or process described hereon at the INSTALLATION ADDRESS in accordance with the plans and specifications on file in the ENGINEERING DIVISION of PSAPCA. This approval is not a waiver of liability for the infraction of Regulation I nor does it relieve the APPLICANT or OWNER of any requirements of other government agencies.

SPECIFIC


H. A. Watters
Reviewing Engineer


A. R. Dammkoehler
Air Pollution Control Officer

sj



Puget Sound Air Pollution Control Agency

Notice of Construction No. 3451
JUN 13 1983
Date _____

HEREBY GRANTS
PERMISSION TO CONSTRUCT, INSTALL, OR ESTABLISH

One C.A.B. Systems abrasive blast room, 50'x50'x37'H, controlled by two Farr & Tenkey Model 84L baghouses at 43,750 cfm and 46,750 cfm and one paint room with three AAF Type V spray booths, 6'x2'x15'H, with Roll-O-Matic Paint Filter, at 35,000 cfm

APPLICANT
Mr. Mark J. Held
Todd Pacific Shipyards Corporation
NAME
P.O. Box 3806
STREET
Seattle, WA 98124
CITY STATE ZIP

OWNER
Same
NAME
STREET
CITY STATE ZIP

INSTALLATION ADDRESS

1801 - 16th Ave. S.W., Seattle, WA 98124
STREET CITY STATE ZIP

SUBJECT TO THE FOLLOWING RESTRICTIONS

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SPECIFIC

H.A. Waters

Reviewing Engineer

kc

A. R. Dammkoehler

A. R. Dammkoehler
Air Pollution Control Officer

Puget Sound Air Pollution Control Agency

HEREBY ISSUES AN ORDER OF APPROVAL
TO CONSTRUCT, INSTALL, OR ESTABLISH

Registration No. 12539

Notice of
Construction No. 4213

Date DEC 19 1991

One Portable Cleaver-Brooks CB 428-150 gas-fired Boiler at 6,280 MBH.

JIM ANDERSON

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TODD PACIFIC SHIPYARDS CORP

PO BOX 3806

SEATTLE

WA 98124-3806

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TODD PACIFIC SHIPYARDS CORP

PO BOX 3806

SEATTLE

WA 98124-3806

INSTALLATION ADDRESS

TODD PACIFIC SHIPYARDS CORP, 1801 16TH AVE SW, SEATTLE, WA, 98134

THIS ORDER IS ISSUED SUBJECT TO THE FOLLOWING RESTRICTIONS AND CONDITIONS

1. Approval is hereby granted as provided in Article 6 of Regulation I of the Puget Sound Air Pollution Control Agency to the applicant to install, alter or establish the equipment, device or process described hereon at the INSTALLATION ADDRESS in accordance with the plans and specifications on file in the Engineering Division of PSAPCA.
2. Compliance with this ORDER and its conditions does not relieve the owner or operator from the responsibility of compliance with Regulations I, II or III, RCW 70.94 or any other emission control requirements, nor from the resulting liabilities and/or legal remedies for failure to comply. Section 5.05(e) of Regulation I requires that the owner or operator must develop and implement an operation and maintenance (O&M) plan to assure continuous compliance with Regulations I, II, and III.
3. This approval does not relieve the applicant or owner of any requirement of any other governmental agency.


HARRY A. WATTERS
Reviewing Engineer

MEJ


ANITA J. FRANKEL

Air Pollution Control Officer

Puget Sound Air Pollution Control Agency

HEREBY ISSUES AN ORDER OF APPROVAL
TO CONSTRUCT, INSTALL, OR ESTABLISH

Registration No. 12539

Notice of
Construction No. 5671

Date NOV 22 1994

Outdoor Spray Painting for large fabrications up to 40' x 60' that could weigh 80 tons.

JIM ANDERSON, MANAGER OF FACILITIES

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TODD PACIFIC SHIPYARDS CORP

PO BOX 3806

SEATTLE

WA 98124-3806

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PO BOX 3806

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WA 98124-3806

INSTALLATION ADDRESS

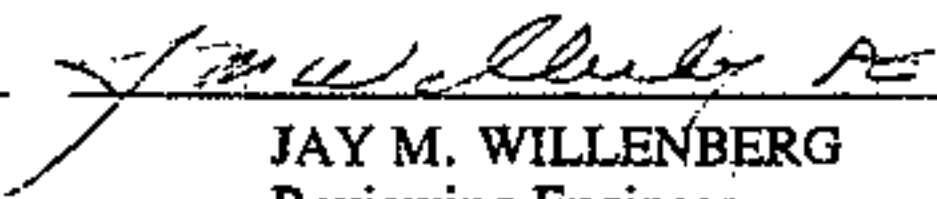
TODD PACIFIC SHIPYARDS CORP, 1801 16TH AVE SW, SEATTLE, WA, 98134


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3. This approval does not relieve the applicant or owner of any requirement of any other governmental agency.
4. Only HVLP guns will be used.
5. All HVLP gun operators will receive training in Best Management Practices (BMP) for outdoor spray painting operations. Training records shall be maintained for each operator and shall be made available to PSAPCA inspection staff for review.
6. Staging frames with solid panels or cloth tarping will be used to roof over the item to be painted, with three sides and the ground under the item also covered to control emissions from the enclosure.
7. Painting operations will cease whenever wind conditions would make the enclosure ineffective at containing fugitive spray emissions.


CLAUDE M. WILLIAMS
Reviewing Engineer

MEJ


JAY M. WILLENBERG
Reviewing Engineer


for DENNIS J. McLERRAN
Air Pollution Control Officer

Puget Sound Air Pollution Control Agency

HEREBY ISSUES AN ORDER OF APPROVAL
TO CONSTRUCT, INSTALL, OR ESTABLISH

Registration No. 12539

Notice of
Construction No. 7070

Date MAR 10 1998

One Spray Coating Room (Paint Shop #3, T55 Bldg) rated at 15,000 cfm.

JIM ANDERSON, MGR., FACILITIES

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TODD PACIFIC SHIPYARDS CORP
PO BOX 3806
SEATTLE WA 98124-3806

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TODD PACIFIC SHIPYARDS CORP
PO BOX 3806
SEATTLE WA 98124-3806

INSTALLATION ADDRESS

TODD PACIFIC SHIPYARDS CORP, 1801 16TH AVE SW, SEATTLE, WA, 98134

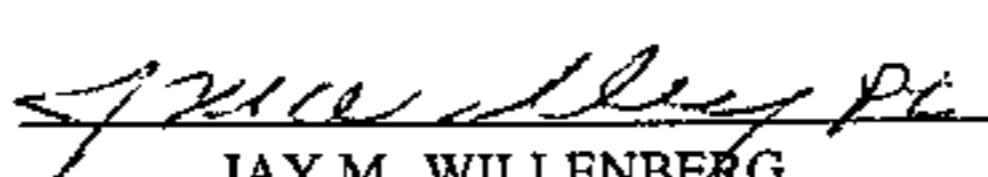
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2. This approval does not relieve the applicant or owner of any requirement of any other governmental agency.
3. Todd Pacific Shipyards shall install and maintain a gauge to measure the pressure drop across the spray area exhaust filters. Within 90 days after beginning operations, the acceptable range for the gauge shall be clearly marked on or nearby the gauge.
4. Once during each day that the spray area is used, Todd Pacific Shipyards shall record the pressure drop across the exhaust filters. If the pressure drop is not within the acceptable range, Todd Pacific Shipyards shall take corrective action as specified in the facility's Operation and Maintenance Plan. Logs of all readings and correction actions taken shall be kept on site and available for PSAPCA review.
5. Todd Pacific Shipyards shall use best management practices in their spray coating operation, including the collection of VOC containing materials used for cleanup of equipment to minimize evaporation to the atmosphere, keeping containers used for the storage and disposal of VOC containing materials closed except when these containers are being cleaned or when materials are being added, mixed or removed; and storing solvent rags and paper for disposal in closed containers.
6. Todd Pacific Shipyard shall only use the following high transfer efficiency spray equipment in their spray coating operations in this spray coating area: airless, air assisted airless (less than 10 psi), HVLP and limited use of conventional (jobs requiring less than 2 gallons per day).
7. Todd Pacific Shipyard shall only use low VOC general purpose coatings that do not exceed 340 grams/liter VOC (2.8 lbs/gal) in this spray coating room. Other special purpose coatings shall be limited in VOC content as listed in Table 2 of 40 CFR 63, Subpart II, the National Emission Standards for Shipbuilding and Ship Repair (Surface Coating).
8. When using conventional spray guns, a log shall be maintained at the spray coating site listing the amount of VOC containing materials used per day and the total spray area covered per item.
9. This Order of Approval No. 7070, issued to amend frequency of recording pressure drop from once each shift to daily, hereby supersedes and cancels order of Approval No. 7070 dated Nov 4, 1997.

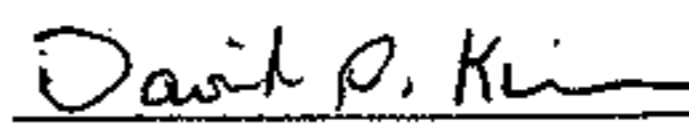

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CLAUDE M. WILLIAMS
Reviewing Engineer

MEJ



JAY M. WILLENBERG
Reviewing Engineer



for DENNIS J. McLERRAN
Air Pollution Control Officer



Puget Sound Clean Air Agency

Notice of
Construction No. **7253**
Registration No. **12539**

HEREBY ISSUES AN ORDER OF APPROVAL
TO CONSTRUCT, INSTALL, OR ESTABLISH

Date
APR 05 2002

Vacuum Enhanced Groundwater Remediation including a Low Profile, Tray-Type Air Stripper and a Soil Vapor Extraction System routing extracted vapor through a Thermal Oxidizer.

APPLICANT

Al Rainsberger
Todd Pacific Shipyards Corp
PO Box 3806
Seattle, WA 98124-3806

OWNER

Todd Pacific Shipyards Corp
PO Box 3806
Seattle, WA 98124-3806

INSTALLATION ADDRESS

Todd Pacific Shipyards Corp, 1801 16th Ave SW, Seattle, WA, 98134

THIS ORDER IS ISSUED SUBJECT TO THE FOLLOWING RESTRICTIONS AND CONDITIONS

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2. This approval does not relieve the applicant or owner of any requirement of any other governmental agency.
3. Todd Shipyards shall not operate the soil and groundwater remediation systems shall for a period longer than six years from the date of this order.
4. The daily groundwater flow rate shall not exceed 25,000 gallons per day as measured continuously with a flow meter and shall be recorded daily.
5. The influent benzene concentration of the groundwater through the air stripper shall not exceed 500 ug/liter.
6. The air flow rate through the air stripper stack shall not exceed 300 cfm.
7. Todd Shipyards shall route all effluents from the Vacuum Enhanced Soil Vapor Extraction system through the 2-stage carbon adsorber or the Catalytic Oxidizer.
8. When operating the carbon adsorber system, the flow rate through the carbon adsorber shall not exceed 300 cfm and the concentration of Total Petroleum Hydrocarbons (TPH(g)) entering the second adsorber in the train shall not exceed 50 ppmv.
9. When operating the CATOX system, the flow rate through the CATOX shall not exceed 330 cfm.
10. When operating the CATOX, the temperature at the inlet of the catalyst bed of the CATOX shall be at least 310 deg Celsius (590 deg Fahrenheit) and the temperature at the outlet of the catalyst bed of the CATOX shall exceed 330 degree Celsius (626 deg Fahrenheit). Todd Shipyard shall measure the temperature with a probe or instrument that has an accuracy of +/- 15 deg Celsius (60 deg Fahrenheit). Todd Shipyard shall calibrate the temperature probe at least once

Order of Approval for NC No. 7253

APR 05 2002

every 10,000 hours of CATOX operation.

11. When operating the CATOX, the TPH(g) Destruction and Removal Efficiency as measured by the mass flow rate into and out of the CATOX shall be at least 95%. Todd Shipyard shall keep a plot of Outlet Temperature versus DRE. Mass flow rates into and out of the CATOX unit shall consist of TPH(g) concentration measurements that correspond with gas flow rate measurements completed during the sampling event.

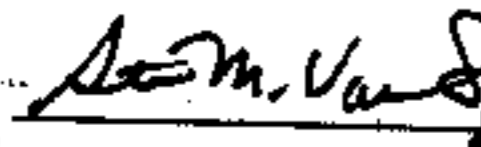
12. Todd Shipyards shall maintain all monitoring records as described in Conditions 4 to 11 on site and make them available to Puget Sound Clean Air Agency personnel on request.

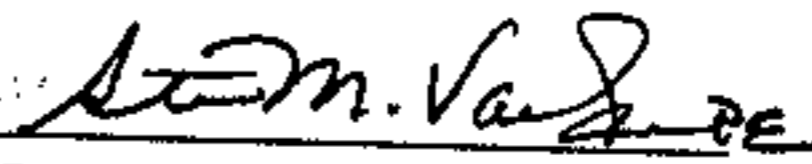
13. Todd Shipyards shall perform monthly monitoring of the parameters described in Conditions 5 to 11. Todd Pacific Shipyards Corp may remove the control equipment (carbon adsorbers or CATOX) when the concentration of TPH(g) entering the control equipment is below 50 ppmv for three consecutive monitoring events provided the air flow rate does not exceed 300 cfm. Each gas stream sampling for TPH(g) required by this Order of Approval shall also include benzene as a test parameter.

14. This Order of Approval No. 7253 hereby supersedes and cancels Order of Approval No. 7253 dated November 14, 2000.

APPEAL RIGHTS

Pursuant to Puget Sound Clean Air Agency's Regulation I, Section 3.17 and RCW 43.21B.310, this Order may be appealed to the Pollution Control Hearings Board (PCHB). To appeal to the PCHB, a written notice of appeal must be filed with the PCHB and a copy served upon Puget Sound Clean Air Agency within 30 days of the date the applicant receives this Order.


for Kwame Agyei
Reviewing Engineer
ns


Steven Van Slyke
Supervising Engineer

Puget Sound Clean Air Agency

Notice of Construction No. 8496

Registration No. 12539

Date MAY 9 - 2001

HEREBY ISSUES AN ORDER OF APPROVAL TO CONSTRUCT, INSTALL, OR ESTABLISH

Stage 1 vapor recovery using Coaxial System on one 2,500 gallon underground gasoline storage tank, equipped with CARB-approved pressure vacuum valves; equipment and installation as per CARB Executive Order G-70-97-A.

APPLICANT

Greg Fladseth
Global Environmental
3840 W Marginal Way SW
Seattle, WA 98106

OWNER

Jim Anderson
Todd Pacific Shipyards Corp
PO Box 3806
Seattle, WA 98124-3806

INSTALLATION ADDRESS

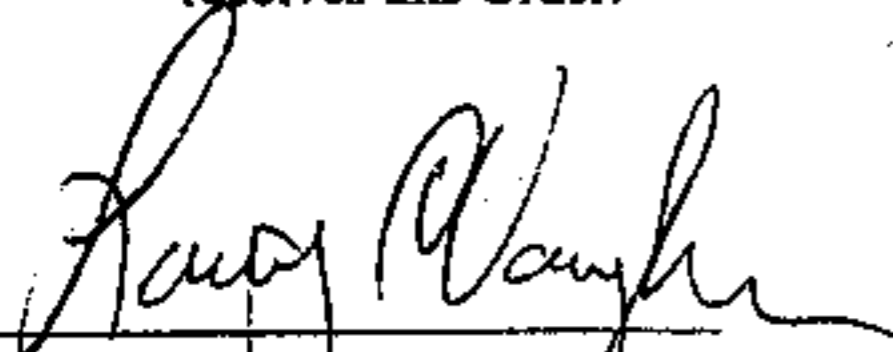
Todd Pacific Shipyards Corp, 1801 16th Ave SW, Seattle, WA, 98134

THIS ORDER IS ISSUED SUBJECT TO THE FOLLOWING RESTRICTIONS AND CONDITIONS

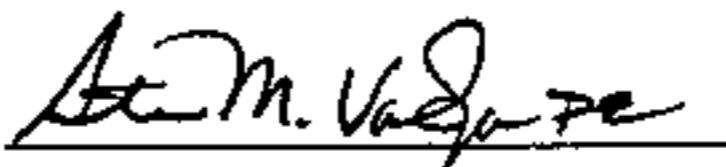
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2. This approval does not relieve the applicant or owner of any requirement of any other governmental agency.
3. Todd Pacific Shipyards shall not dispense gasoline into fuel tanks of any motor vehicle designed for the transportation of people or property and that a license would be required to operate on a highway.
4. Prior to placing the above equipment into operation, the applicant or owner shall certify compliance with the CARB approval order including a pressure decay (CARB test procedure TP-201.3 adopted March 17, 1999) test. The results of the equipment installation certification tests shall be submitted to the Puget Sound Clean Air Agency within 30 days of equipment startup.

APPEAL RIGHTS

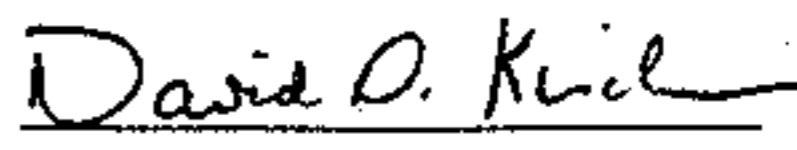
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Larry Vaughn
Reviewing Engineer
mej



Steven Van Slyke
Reviewing Engineer



for Dennis J. McLerran
Air Pollution Control Officer



Puget Sound Clean Air Agency

Notice of
Construction No. **8678**
Registration No. **12539**

JUN 10 2002

HEREBY ISSUES AN ORDER OF APPROVAL TO CONSTRUCT, INSTALL, OR ESTABLISH

- A. Outdoor Spray Coating for Large Fabrications up to 40" x 60" that could weigh 80 tons that cannot be Spray Coated in existing Spray Booths and Rooms. Designated Spray coating areas are located behind Paint Shop No. 2, in front of Paint Shop 1 and 2, Pier 3 Slab, between Buildings T-201 and T-114 and Building Ways (existing). (Modifies NOC No. 5671)
- B. One Binks Dry Filter Spray Coating Booth (T-199, Paint Shop #3) rated at 15,000 cfm. (Modifies NOC No. 7069)
- C. Spray Coating Room (T-230, Shop #2) rated at 100,000 cfm. (Modifies NOC No 7070)

APPLICANT

OWNER

Jim Anderson
Todd Pacific Shipyards Corp
PO Box 3806
Seattle, WA 98124-3806

Todd Pacific Shipyards Corp
PO Box 3806
Seattle, WA 98124-3806

INSTALLATION ADDRESS

Todd Pacific Shipyards Corp, 1801 16th Ave SW, Seattle, WA, 98134

THIS ORDER IS ISSUED SUBJECT TO THE FOLLOWING RESTRICTIONS AND CONDITIONS

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2. This approval does not relieve the applicant or owner of any requirement of any other governmental agency.

I. OUTDOOR SPRAY COATING as referred to in A above.

PAINTING RESTRICTIONS:

3. All coatings spray coated shall meet the requirements in 40 CFR 63 Subpart II Shipbuilding and Repair NESHAP.

SPRAY EQUIPMENT:

4. Todd Pacific Shipyards shall conduct all outdoor spray coating using High Volume Low Pressure (HVLP), airless, air assisted airless or similar high transfer spray equipment. Similar high transfer spray equipment must have documentation showing > 60% transfer efficiency e.g., SCAQMD Spray Equipment Transfer Efficiency Test Procedure for Equipment User dated May 24, 1989.

SPRAY EQUIPMENT CLEANUP AND RAGS:

5. Todd Pacific Shipyards shall not use open containers for the storage or disposal of VOC-containing material. Such containers and tanks shall be kept closed except when being cleaned or when materials are being added, mixed or removed. Closed containers for solvent rags or paper disposal are required. Empty containers as defined in WAC 173-

Order of Approval for NC No. 8678

JUN 10 2002

303-160 are exempt.

OVERSPRAY CONTAINMENT:

6. Todd Pacific Shipyards shall confine overspray from the outdoor spray coating operation to the facility where the spray coating is conducted by using tarping methods (e.g., tarpaulins, plastic barriers, shrink wrap, mobile enclosures, physical barriers or similar methods). If the tarping system has rips, tears or gaps that may cause overspray to be deposited off the property, Todd Pacific Shipyards shall initiate repairs immediately upon discovery, but not later than the next work shift. Spray coating shall be curtailed during windy periods that have the potential to carry overspray onto neighboring property.

NUISANCE MONITORING PLAN:

7. Todd Pacific Shipyards shall record and investigate complaints regarding odor or overspray as soon as possible, but no later than 12 hours after receipt of the complaint. The investigation will include documentation of wind direction and speed during the time the complaint occurred. Todd Pacific Shipyards shall correct any problem identified by the complaint investigations within 24 hours of identification or discontinue operation of the affected equipment or process until corrective action is complete.

TRAINING:

8. All HVLP gun operators shall receive training in Best Management Practices (BMP) for outdoor spray coating operations.

RECORDKEEPING:

9. Todd Pacific Shipyards shall record the following information, maintain the records for at least five years, and make them available to Puget Sound Clean Air Agency personnel upon request:

- (a) Overspray and Containment Inspections: A log that indicates tarping systems were inspected after each shift and when any repairs or replacements were performed, including the date and time of the repair or replacement;
- (b) Nuisance-Monitoring Plan indicating all complaints received regarding odors or nuisance including date and time of complaint, the nature of complaint, the wind speed and direction at the time of the complaint, and the date, time and nature of any corrective action;
- (c) HVLP gun operator training records;
- (d) Daily Coating Usage Log indicating the gallons of all coating sprayed each day; and
- (e) Copies of Material Safety Data Sheets for each coating used at the facility.

II. ONE BINKS DRY FILTER SPRAY COATING BOOTH (T-199, PAINT SHOP #3) RATED AT 15,000 CFM.

PAINTING RESTRICTIONS:

10. All coatings spray coated shall meet the requirements in 40 CFR 63 Subpart II Shipbuilding and Repair NESHAP.

SPRAY EQUIPMENT:

11. Todd Pacific Shipyard shall only use the following high transfer efficiency spray equipment in their spray coating

Order of Approval for NC No. 8678

JUN 10 2002

operations in this spray booth e.g., airless, air assisted airless, HVLP or similar high transfer efficiency spray equipment. Todd Pacific Shipyard shall limit use of conventional equipment spray equipment to coating components that preclude the use of high transfer spray equipment e.g., low viscosity, high solids coatings or parts where size and geometric shape require overlapping of successive spray gun strokes in order to achieve the required full coverage and the specific range of mil thickness required by specification or Manufacturer's Product Data.

12. Todd Pacific Shipyards shall install and maintain a gauge to measure the pressure drop across the spray booth exhaust filters. Within 90 days after beginning operations, the acceptable range for the gauge shall be clearly marked on or nearby the gauge.

13. Once during each day that the spray booth is used, Todd Pacific Shipyards shall record the pressure drop across the exhaust filters. If the pressure drop is not within the acceptable range, Todd Pacific Shipyards shall take corrective action as specified in the facility's Operation and Maintenance Plan. Logs of all readings and corrective actions taken shall be kept on site and available for Agency review.

MANAGEMENT PRACTICES:

14. Todd Pacific Shipyards shall use best management practices in their spray coating operation, including the collection of VOC containing materials used for cleanup of equipment to minimize evaporation to the atmosphere, keeping containers used for the storage and disposal of VOC containing materials closed except when these containers are being cleaned or when materials are being added, mixed or removed; and storing solvent rags and paper for disposal in closed containers.

RECORDKEEPING:

15. Todd Pacific Shipyards shall record the following information, maintain the records for at least two years, and make them available to Puget Sound Clean Air Agency personnel upon request:

- (a) Spray Booth Inspections: A log that indicates filter condition, pressure drop, and corrective actions taken;
- (b) Daily Coating Usage Log indicating the gallons of all coating sprayed each day; and
- (c) Copies of Material Safety Data Sheets for each coating used at the facility.

III. ONE SPRAY COATING ROOM (T-230, SHOP #2) RATED AT 100,000 CFM.

PAINTING RESTRICTIONS:

16. All coatings spray coated shall meet the requirements in 40 CFR 63 Subpart II Shipbuilding and Repair NESHAP.

SPRAY EQUIPMENT:

17. Todd Pacific Shipyard shall only use the following high transfer efficiency spray equipment in their spray coating operations in this spray room e.g., airless, air assisted airless, HVLP or similar high transfer efficiency spray equipment. Todd Pacific Shipyard shall limit use of conventional equipment spray equipment to coating components that preclude the use of high transfer spray equipment e.g., low viscosity, high solids coatings or parts where size and geometric shape require overlapping of successive spray gun strokes in order to achieve the required full coverage and the specific range of mil thickness required by specification or Manufacturer's Product Data.

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18. Todd Pacific Shipyards shall install and maintain a gauge to measure the pressure drop across the spray area exhaust filters. Within 90 days after beginning operations, the acceptable range for the gauge shall be clearly marked on or nearby the gauge.

19. Once during each day that the spray area is used, Todd Pacific Shipyards shall record the pressure drop across the exhaust filters. If the pressure drop is not within the acceptable range, Todd Pacific Shipyards shall take corrective action as specified in the facility's Operation and Maintenance Plan. Logs of all readings and corrective actions taken shall be kept on site and available for Agency review.

MANAGEMENT PRACTICES:

20. Todd Pacific Shipyards shall use best management practices in their spray coating operation, including the collection of VOC containing materials used for cleanup of equipment to minimize evaporation to the atmosphere, keeping containers used for the storage and disposal of VOC containing materials closed except when these containers are being cleaned or when materials are being added, mixed or removed; and storing solvent rags and paper for disposal in closed containers.

RECORDKEEPING:

21. Todd Pacific Shipyards shall record the following information, maintain the records for at least two years, and make them available to Puget Sound Clean Air Agency personnel upon request:

(a) Spray Booth Inspections: A log that indicates filter condition, pressure drop, and corrective actions taken.

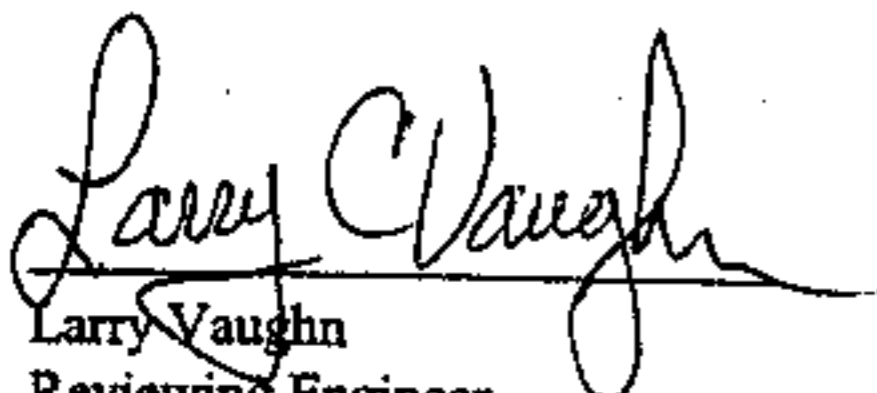
(b) Daily Coating Usage Log indicating the gallons of all coating sprayed each day; and

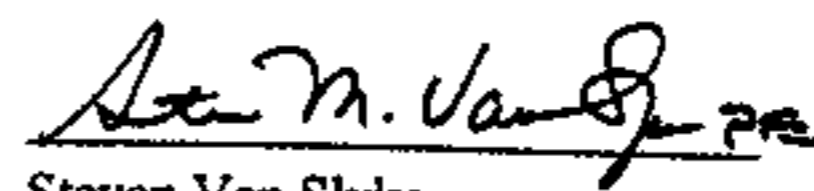
(c) Copies of Material Safety Data Sheets for each coating used at the facility

22. This Order of Approval supercedes and cancels Order of Approval 5671 dated November 11, 1994, Order of Approval No. 7069 dated March 10, 1998, and Order of Approval 7070 dated November 4, 1997.

APPEAL RIGHTS

Pursuant to Puget Sound Clean Air Agency's Regulation I, Section 3.17 and RCW 43.21B.310, this Order may be appealed to the Pollution Control Hearings Board (PCHB). To appeal to the PCHB, a written notice of appeal must be filed with the PCHB and a copy served upon Puget Sound Clean Air Agency within 30 days of the date the applicant receives this Order.


Larry Vaughn
Reviewing Engineer


Steven Van Slyke
Supervising Engineer

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