Northwest Clean Air Agency (NWCAA) hereby issues
Order of Approval to Construct #742b

Project Summary: Nordic Tugs, Inc. is a fiberglass reinforced plastic composite (FRP) boat manufacturing facility that received a permit in July 27, 2000. This modification, requested by the facility, includes the expansion to the lamination building and a new assembly building.

APPLICANT
Nordic Tugs, Inc.
Buddy Brown
Safety/Compliance
11367 Higgins Airport Way
Burlington, WA 98233

OWNER
Nordic Tugs, Inc.
David Goehring
11367 Higgins Airport Way
Burlington, WA 98233

FACILITY LOCATION:
11367 Higgins Airport Way, Burlington, WA 98233

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

1. Only non-atomizing application methods shall be used to apply paints and resin.

2. Emissions discharged during periods of resin application and curing shall be captured and routed through an exhaust system that discharges vertically at least six feet above the roof-line. During periods of resin application the lamination room, including its new addition, shall remain closed and be kept at a negative pressure differential with respect to the outside atmosphere, except for brief periods of time when molds, parts, or personnel are moving in and out of the building. A pressure gauge capable of demonstrating that the lamination room is under negative pressure shall be installed and operated.

3. Before discharge to the outside air, particulate matter from cutting, grinding, and sanding shall be routed through a filtration system to provide particulate matter abatement. The operator shall perform weekly inspections of the external exhaust by:
   - Checking differential pressure across filter banks,
   - Checking filter condition and fit,
   - Inspecting ductwork for integrity,
• Post the acceptable range of differential pressure near pressure gauge for each filter bank and
• Maintain records of all weekly inspections including responses to any deficiencies.

4. Paints, solvents, gelcoat, resin containers and waste liquid containers shall be kept covered at all times when not in use. Resin and gelcoat application equipment shall be cleaned in the layup area. Chlorinated organic solvents shall not be used without prior approval by the NWCAA and a demonstration that no satisfactory alternative exists.

5. Resin, gelcoat, paint and solvent usage or purchase records shall be kept onsite and available for inspection by NWCAA staff for at least five years.

6. Emissions from the facility shall not cause exceedance of acceptable source impact levels specified in WAC 173-460-150 and -160. The facility owner or operator shall demonstrate compliance with this term within 45 days after a written request by the NWCAA. The facility owner or operator shall notify the NWCAA if paint, solvent, resin or gelcoat usage or composition significantly deviates from the usage profile specified in the information provided to NWCAA.

7. The facility owner or operator shall develop and follow a management and operating plan. The plan shall be designed to assure compliance with the terms of this approval order.

8. Onboard diesel engines shall be tested with diesel fuel with sulfur content no greater than 0.05 wt %. To demonstrate compliance with this condition, Nordic Tugs shall either use ASTM D 2880-71 or obtain a certificate from the supplier showing the sulfur content of the fuel. This record shall be available to the NWCAA upon request.

9. Exhaust from onboard diesel engine testing inside the new assembly building shall be routed through an unobstructed upward vertical exit terminating at least six feet above the roof surface. Visible emissions shall not exceed ten percent (10%) opacity for more than three minutes in any consecutive sixty-minute period as determined by the Washington State Department of Ecology Method 9A.
Revision A: The applicant has never used non-atomizing methods for application of gelcoats so this condition was changed to fit the operation. Boats and parts are moved in and out of the building so this condition was changed to accommodate these short periods. The particulate control device for the facility required updated work practice requirements in lieu of the current requirements in the permit. Conditions were updated to reflect current work practices and requirements with respect to solvents and containers. The synthetic minor permit provision was removed so this facility will become a Title V facility and receive an air operating permit.

Revision B: The applicant has built a new assembly building as well as an addition to the old lamination building. Condition 2 was changed to specifically include the new addition to the lamination building. Conditions 8 and 9 were added to include testing of diesel engines of boats inside the new assembly room.