

South Coast Air Quality Management District

Statement of Basis

Proposed Title V Renewal Permit

Facility Name:	Willard Marine
Facility ID:	062617
SIC Code:	3732
Equipment Location:	1250 N. Grove Street Anaheim, CA 92806
Application #(s):	542224
Application Submittal Date(s):	8/21/2012
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1. Introduction and Scope of Permit

Title V is a national operating permit program for air pollution sources. Facilities subject to Title V must obtain a Title V permit and comply with specific Title V procedures to modify the permit. This permit replaces the facility's other existing permits. Title V does not necessarily include any new requirements for reducing emissions. It does, however, include new permitting, noticing, recordkeeping, and reporting requirements.

Pursuant to Title V of the federal Clean Air Act and SCAQMD Rule 3004(f), a Title V permit shall expire five years from the date of issuance unless such permit has been renewed. Accordingly, each facility is required to submit a Title V renewal application and requested the SCAQMD to renew their Title V permit. The proposed permit incorporates updates to the facility information provided in the facility's Title V renewal application and all rules and regulations that are currently applicable to the facility.

The SCAQMD implements Title V through Regulation XXX – Title V Permits, adopted by the SCAQMD Governing Board in order to comply with EPA's requirement that local air permitting authorities develop a Title V program. Regulation XXX was developed with the participation of the public and affected facilities through a series of public workshops, working group meetings, public hearings and other meetings.

The Title V major source threshold for a particular pollutant depends on the attainment status of the pollutant. NO₂, SO₂, and CO are in attainment with federal standards. The status for PM₁₀ is

serious nonattainment. The status for ozone is currently extreme nonattainment. The status for lead is non-attainment.

A Title V renewal permit is proposed to be issued to cover the operations of Willard Marine located at 1250 N. Grove Street, Anaheim, CA 92806. This facility is subject to Title V requirements because it is a major source.

2. Facility Description

This is an existing facility applying for a Title V permit renewal that is engaged in the manufacture of light-weight boats for the Navy and Coast Guard. The facility operates a paint and resin spray room and other supporting equipment.

3. Construction and Permitting History

The facility has been in constant operation with a Title V permit at this location since 2003. A Title V renewal permit was issued to the facility on January 13, 2008.

4. Regulatory Applicability Determinations

Applicable legal requirements for which this facility is required to comply are required to be identified in the Title V permit (for example, Section D, E, and H of the proposed Title V permit). Applicability determinations (i.e., determinations made by the District with respect to what legal requirements apply to a specific piece of equipment, process, or operation) can be found in the Engineering Evaluations. This facility is not subject to any NSPS or NESHAP requirements. To ensure that the facility is exempt from 40CFR 63 Subpart II and Subpart VVVV, facility wide permit conditions are specified in the Title V permit limiting the quantity of hazardous air pollutant (HAP) emissions from the facility to less than 10 tons per year of a single HAP, and a combination of HAPs to less than 25 tons per year.

5. Monitoring and Operational Requirements

Applicable monitoring and operational requirements for which the facility is required to comply are identified in the Title V permit (for example, Section D, F, and J and Appendix B of the proposed Title V permit). Discussion of any applicable operational requirements can be found in the Engineering Evaluations. All periodic monitoring requirements were developed using strict adherence to the following applicable guidance documents: SCAQMD Periodic Monitoring Guidelines for Title V Facilities (November 1997); CAPCOA/CARB/EPA Region IX Periodic Monitoring Recommendations for Generally Applicable Requirements in SIP (June 1999); and CAPCOA/CARB/EPA Region IX Recommended Periodic Monitoring for Generally Applicable Grain Loading Standards in the SIP: Combustion Sources (July 2001).

Since the facility complies with applicable rules requirements and emission limits without the use of air pollution control equipment, the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 are not applicable to this facility.

6. Permit Features

Permit Shield

A permit shield is an optional part of a Title V permit that gives the facility an explicit protection from requirements that do not apply to the facility. A permit shield is a provision in a permit that states that compliance with the conditions of the permit shall be deemed compliance with all identified regulatory requirements. To incorporate a permit shield into the Title V permit involves submission of applications for change of conditions for each equipment affected by the permit shield. Permit shields are addressed in Rule 3004 (c). This facility has not applied for a permit shield.

Streamlining Requirements

Some emission units may be subject to multiple requirements which are closely related or redundant. The conditions may be streamlined to simplify the permit conditions and compliance. Emission limits, work practice standards, and monitoring, recordkeeping, and reporting requirements may be streamlined. Compliance with a streamlined condition will be deemed compliance with the underlying requirements whether or not the emission unit is actually in compliance with the specific underlying requirement. This facility has not applied for any streamlined conditions.

7. Summary of Emissions and Health Risks

Criteria Pollutant Emissions (tons/year) Annual Reported Emissions for Reporting Period 2009

Pollutant	Emissions (tons/year)
NO _x	0
CO	0
VOC	2.581
PM	0.032
SO _x	0

Toxic Air Contaminants Emissions (TAC) Annual Reported Emissions for Reporting Period 2012

The Following TACs Were Reported	Emissions (lbs/yr)
None	-

Health Risk from Toxic Air Contaminants

The facility is subject to review by the Air Toxics Information and Assessment Act (AB2588). The SCAQMD is tracking the status of the facility under AB2588.

8. Compliance History

As noted, the facility has been in constant operation with a Title V permit since 2003. The facility has been subject to both self-reporting requirements and SCAQMD inspections. The facility has had one citizen complaint filed in the last two years. The anonymous complaint

alleged the facility was operating an unpermitted spray booth on weekends and not providing training. The inspector found one spray room at the facility. The spray room had a valid permit. The facility also provided records of multiple training classes conducted in the last two years and was found to be in compliance at the time of the inspection. The facility was issued two Notices of Violation in the last two years for submitting the semiannual and annual reports for 2011 late, and the Title V renewal application less than 180 days prior to the date of permit expiration. The facility has submitted all reports and applications, and is currently operating in compliance with all applicable rules and permit conditions.

9. Compliance Certification

By virtue of the Title V permit application and issuance of this Title V renewal permit, the reporting frequency for compliance certification for the facility shall be annual.