



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION

ANGUS S. KING, JR.
GOVERNOR

MARTHA KIRKPATRICK
COMMISSIONER

Bath Iron Works Corporation)
Sagadahoc County)
Bath, Maine)
A-333-71-M-M)

Departmental
Findings of Fact and Order
Air Emission License
Amendment #10

After review of the air emissions license amendment application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A., Section 344 and Section 590, the Department finds the following facts:

I. REGISTRATION

A. Introduction

1. Bath Iron Works Corporation (BIW) of Bath, Maine was issued Air Emission License A-333-72-B-R on September 25, 1992, permitting the operation of emission sources associated with their shipbuilding and repair facility. The license was subsequently amended on February 24, 1995 (A-333-72-C-M), on May 29, 1995 (A-333-72-D-M), on July 6, 1995 (A-333-72-E-A), on September 12, 1996 (A-333-71-G-A), on October 8, 1997 (A-333-71-H-M), on September 27, 1999 (A-333-71-I-M), on November 2, 1999 (A-333-71-J-M), on July 13, 2000 (A-333-71-K-A) and again on February 13, 2001 (A-333-71-L-A).
2. EPA has requested that the Department issue a minor revision to the existing BIW license in order to incorporate the provisions of the Control Techniques Guideline for Shipbuilding and Ship Repair Operations (Surface Coating).

On August 27, 1996 EPA published Volume 61, Number 167 (pages 44050-44057): Control Techniques Guideline for Shipbuilding and Ship Repair Operations (Surface Coating). The CTG is a guideline for states to assist them in analyzing and determining reasonably available control technology (RACT) for shipbuilding and ship repair operations located within ozone national ambient air quality standards (NAAQS) nonattainment areas. The requirements for this CTG are hereby incorporated into this license.

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ORDER

The Department hereby grants Air Emission License Minor Revision A-333-71-M-M, subject to the conditions found in Air Emission License A-333-72-B-R, in the following amendments: A-333-72-C-M, A-333-72-D-M, A-333-72-E-A, A-333-71-G-A, A-333-71-H-M, A-333-71-I-M, A-333-71-J-M, A-333-71-K-A, A-333-71-L-A, and in addition to the following conditions:

The following are new conditions:

(1) Painting Operations

A. No coating shall be applied to a ship with an as-applied VOC content exceeding the following as determined by the procedures described in the CTG:

Coating Category	VOC limits ^{a,b}		
	Grams/liter coating (minus water and exempt compounds)	Grams/liter solids ^c	
		t ≥ 4.5°C (40°F)	t < 4.5°C (40°F) ^d
General use	340	571	728
Specialty:			
Air flask	340	571	728
Antenna	530	1,439	-
Antifoulant	400	765	971
Heat resistant	420	841	1,069
High-gloss	420	841	1,069
High temperature	500	1,237	1,597
Inorganic zinc high-build	340	571	728
Military exterior	340	571	728
Mist	610	2,235	-
Navigational aids	550	1,597	-
Nonskid	340	571	728
Nuclear	420	841	1,069
Organic zinc	360	630	802
Pretreatment wash primer	780	11,095	-
Repair and maint. of thermoplastics	550	1,597	-
Rubber camouflage	340	571	728
Sealant for thermal spray aluminum	610	2,235	-
Special marking	490	1,178	-
Specialty interior	340	571	728
Tack coat	610	2,235	-
Undersea weapons systems	340	571	728
Weld-through precon.primer	650	2,885	-

^a The limits are expressed in two sets of equivalent units. Either set of limits may be used to demonstrate compliance.

^b to convert from g/L to lb/gal, multiply by (3.785 L/gal)(1/453.6 lb/g) or 1/120.

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- c VOC limits expressed in units of mass of VOC per volume of solids were derived from the VOC limits expressed in units of mass of VOC per volume of coating assuming the coatings contain no water or exempt compounds and that the volumes of all components within a coating are additive.
- d these limits apply during cold-weather time periods. Cold-weather allowances are not given to coatings in categories that permit less than 40 percent solids content by volume. Such coatings are subject to the same limits regardless of weather conditions.

- B. All coatings used in volumes of less than 52.8 gallons per year shall be clearly labeled as "low usage exempt." The total volume of all "low usage exempt" materials can not exceed 264 gallons per year.
- C. All handling and transferring of VOHAP-containing materials to and from containers and drums shall be conducted in a manner that minimizes spills.
- D. All containers and drums shall be free of cracks, holes and other defects and shall remain closed at all times unless materials are being transferred to or removed from them.

(2) Recordkeeping

- A. The following records shall be maintained for the painting operations:
1. monthly records of volumes of "low usage exempt" applied at the facility
 2. monthly records of the total volume of coating applied to ships
 3. the following records shall be maintained at the facility:
 - a. all documentation supporting initial notification,
 - b. a copy of the facility's approved implementation plan,
 4. the following records shall be maintained at the facility and compiled on a monthly basis:
 - a. identification of the coatings used, their appropriate coating categories, and the applicable VOC limit;
 - b. certification of the as-supplied VOC content of each batch of coating;
 - c. a determination of whether containers are kept closed at all times coatings are not being added or removed; and
 - d. the results of any Method 24 testing.
 - e. for coatings to which thinning solvent will not be added:
 - i. certification of the as-applied VOC content of each batch of coating, and
 - ii. the volume of each coating applied
 - f. for coatings to which thinning solvent will be added-coating by coating compliance:
 - i. the density and mass fraction of water and exempt compounds of each thinner and the volume fraction of solids in each batch, including any calculations,
 - ii. the maximum allowable thinning ratio

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- iii. if cold-weather thinning allowances are used, the dates and times during which the ambient temperature at the affected source was below 4.5°C (40°F) at the time the coating was applied and the volume used of each batch of the coating, as-supplied, during these dates,
 - iv. the volume used of each batch of coating, as-supplied,
 - v. the total allowable volume of thinner for each coating, including calculations, and
 - vi. the actual volume of thinner used for each coating.
 - g. for coatings to which the same thinning solvent will be added-group compliance:
 - i. the density and mass fraction of water and exempt compounds of each thinner and the volume fraction of solids in each batch, including any calculations,
 - ii. the maximum allowable thinning ratio,
 - iii. if cold-weather allowances are used, the dates and times during which the ambient temperature at the affected source was below 4.5°C (40°F) at the time the coating was applied and the volume used of each batch in the group, as-supplied, during these dates
 - iv. identification of each group of coatings and their designated thinners,
 - v. the volume used of each batch of coating in the group, as-supplied,
 - vi. the total allowable volume of thinner for the group, including calculations, and
 - vii. the actual volume of thinner used for the group.
 - h. If BIW detects a violation of the standards, for the remainder of the reporting period include the following information in the records:
 - i. a summary of the number and duration of deviations,
 - ii. identification of the data availability achieved, including the number and total duration of incidents,
 - iii. compliance status as of the last day of the reporting period and whether compliance was continuous or intermittent.
- (3) The licensee shall maintain sufficient records to accurately document compliance with emission standards and license conditions and shall maintain such records for a minimum of six (6) years. The records shall be submitted to the Department upon written request.
- (4) BIW shall be in compliance with the above stated VOC limits immediately upon issuance of this license.

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- (5) This amendment shall expire concurrently with Air Emission License A-333-72-B-R.

DONE AND DATED IN AUGUSTA, MAINE THIS *11th* DAY OF *April* 2001.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: *James P. Brooks for J*

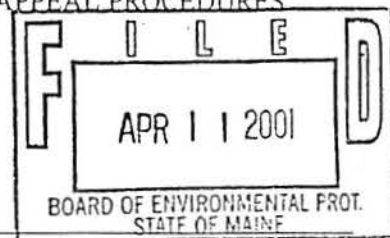
MARTHA G. KIRKPATRICK, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: March 19, 2001

Date of application acceptance: March 27, 2001

Date filed with the Board of Environmental Protection: _____



This Order prepared by Stephanie C. Toothaker, Bureau of Air Quality