



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

TIDEWATER REGIONAL OFFICE

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STATEMENT OF LEGAL AND FACTUAL BASIS

Lyon Shipyard, Inc.
PO Box 2180
Norfolk, Virginia 23501
Permit No. TRO-61274

Title V of the 1990 Clean Air Act Amendments required each state to develop a permit program to ensure that certain facilities have federal Air Pollution Operating Permits, called Title V Operating Permits. As required by 40 CFR Part 70 and 9 VAC 5 Chapter 80, Lyon Shipyard, Inc. has applied for an initial Title V Operating Permit for its Norfolk facility. The Department has reviewed the application and has prepared a draft Title V Operating Permit.

Permit Writer / Contact:

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Date: September 10, 2012

Regional Air Permits
Manager:

Troy D. Breathwaite

Date: September 10, 2012

Regional Director:

Maria R. Nold

Date: September 10, 2012

I. FACILITY INFORMATION

Permittee

Lyon Shipyard, Inc.
PO Box 2180
Norfolk, Virginia 23501

Facility

Lyon Shipyard, Inc.
1801 Brown Avenue
Norfolk, Virginia 23504-459

County-Plant Identification Number: 51-710-00249

A. SOURCE DESCRIPTION

NAICS Code: 336611 - Ship building and repairing

Lyon Shipyard, Inc. functions primarily as a ship repair facility.

Abrasive Grit Blasting: To prepare the ship for painting, power washing is performed using portable power washers and/or abrasive blasting is performed using grit blasting material. The blasting is performed by nine abrasive blast units permitted in the May 10, 2012 State Operating Permit.

The abrasive blasting is performed by using the abrasive grit blasting units. Grit is supplied to the units using portable abrasive grit pots. These pots are filled with grit (1) pneumatically from a delivery tanker truck, (2) from two on-site grit storage silos (25 ton capacity per silo) or (3) manually pouring the grit into the pot. The particulate emissions from filling the abrasive grit pots are controlled by venting the exhaust from the pot through a 55 gallon drum of water. The particulate emissions from filling the silos are controlled by venting the silo exhaust through a 55 gallon drum of water; or for the storage silo located adjacent to the Blast Building, the silo is vented to the Blast Building. The Blast Building is enclosed and is not vented to the ambient air.

Blasting Process – Metal Building: Metal parts are prepared for painting inside the Blast Building using abrasive grit. The grit is pneumatically supplied by a abrasive grit pot located under the abrasive grit silo located adjacent to the building. The Blast Building is enclosed. The abrasive grit is the same as used in the Abrasive Blasting and is included in the reporting of the permitted abrasive blasting material usage required by the May 10, 2012 State Operating Permit.

Blasting Process – Miscellaneous: Smaller metal parts are blasted for cleaning and/or preparation for painting inside the Wheelabrator Building. The blasting occurs in an enclosed, nonvented hand cabinet or in a Pangborne ES-1885-32 Rotoblast machine. The Pangborn unit is equipped with a dust collector that is vented to the ambient air. The blast material used is steel shot. Nonvented hand cabinet blast units may be used in other parts of the facility.

Painting: Painting performed on ships in both wet and dry docks is addressed by the six airless pump spray guns in the July 10, 2010 State Operating Permit. Individual metal parts are also painted in several areas in the facility, including the Wheelabrator Building. The paint applied at these locations is included in the reporting of the permitted usage of the paint required by the May 10, 2012 State Operating Permit.

Metal Shop Fabrication and Machine Shops: Metal fabrication is performed at several locations at the facility, including a metal shop fabrication that has a plasma torch unit that cuts pieces of metal. This unit is vented to the ambient air.

Burning (cutting) and welding are performed at different locations, including inside buildings and outside.

Wood Working: Lyon Shipyard, Inc. has a wood working operation consisting of several pieces of wood working equipment. Sawdust generated from this equipment is collected by a pneumatic system and transferred to a bin that is located inside the building. The pneumatic system is equipped with a cyclone.

Hand applied stain and sealer may be used on some wood pieces for repairing of ships.

Fuel Burning: Fuel burning equipment includes two distillate oil-fired boilers, each rated at 3.45 MMBtu/hr each. These boilers provide hot water for ships that are being repaired. Several distillate oil-fired space heaters provide space heating to buildings. Two space heaters rated at 0.28 MMBtu/hr and 0.35 MMBtu/hr also burn on-site generated used oil.

Lyon Shipyard, Inc. has two emergency stationary engines that burn No. 2 Fuel Oil and are used as follows:

- 500 kW (670 HP) rated capacity No. 2 Fuel Oil-fired stationary emergency generator used to provide emergency power for the floating dry dock: MACT, Subpart ZZZZ applies. However, the only applicable requirement is the initial notification.
- 200 HP rated capacity No. 2 Fuel Oil-fired stationary pump for fire suppression: MACT, Subpart ZZZZ applies. Because of the August 20, 2010 amendment to Subpart ZZZZ, the compliance date for the applicable requirements of Subpart ZZZZ is May 3, 2013.

Lyon Shipyard, Inc. has several portable engines that provide electrical or mechanical power for operating power waters, pumps, etc.

Miscellaneous: Cleaning of metal parts may be performed by use of non-halogenated solvents. There are two other miscellaneous operations or emission units that are insignificant from a Title V perspective. These operations include facility maintenance, storage tanks for No. 2 Fuel Oil, used oil, oil/water from compressor blowdown, and use of fuel oil for space heating. The emergency generator and water fire pump are insignificant based on emissions. However, the engines are subject to MACT, Subpart ZZZZ and therefore cannot be considered insignificant for the purposes of Title V permitting.

The facility is a Title V major source of HAP. This source is located in an attainment area for all pollutants, and is a PSD minor source. Lyon Shipyard, Inc. was constructed before 1972. There is a State Operating permit associated with this facility dated May 10, 2012.

II. COMPLIANCE STATUS

A full compliance evaluation of this facility, including a site visit, was conducted on September 6, 2011. In addition, all reports and other data required by permit conditions or regulations, which are submitted to DEQ, are evaluated for compliance. Based on these compliance evaluations, the facility has not been found to be in violation of any state or federal applicable requirements at this time.

III. EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

The emissions units at this facility consist of the following :

Emission Unit ID	Stack ID	Emission Unit Description	Size/Rated Capacity*	Pollution Control Device (PCD) Description	PCD ID	Pollutant Controlled	Applicable Permit Date
Fuel Burning Equipment							
16	BS-1	Cyclotherm Model MC-1500 distillate oil-fired boiler	3.45 MMBtu/hr	None	-	-	May 10, 2012
17	BS-2	Cyclotherm Model MC-1500 distillate oil-fired boiler	3.45 MMBtu/hr	None	-	-	May 10, 2012
EG-1	EGS-1	Diesel fired Emergency Generator	500 kW	None	-	-	May 10, 2012
FP-1	FPS-1	Diesel fired fire pump	200 hp	Non	-	-	May 10, 2012
Abrasive Blasting							
7 – 15	NA	Nine (9) - Abrasive grit blasting units (nozzles as sources)	6 tons/hr (total)	None	-	-	May 10, 2012
Spray Painting							
1 – 6	NA	Six (6) - Airless pumps with spray gun applicators (nozzles as sources)	540 gal/hr (total)	None	-	-	May 10, 2012
Degreasing Operations - Non-Halogenated Cold Degreaser							
DC	NA	Cold Solvent Degreaser sinks	-	None	-	-	-

IV. EMISSIONS INVENTORY

A copy of the 2011 annual emission update is attached. Emissions are summarized in the following tables.

2011 Actual Emissions

2011 Criteria Pollutant Emission in Tons/Year				
VOC	CO	SO ₂	PM ₁₀	NO _x
15.8	0.003	0.004	16.2	0.01

2011 Facility Hazardous Air Pollutant Emissions

Pollutant	2011 Hazardous Air Pollutant Emission in Tons/Yr
None	None

V. FUEL BURNING EQUIPMENT APPLICABLE REQUIREMENTS – (Ref. Nos. 16, 17, EG-1, and FP-1)

A. Limitations

1. The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:
 - 9 VAC 5-50-80 and 290, New Source Standard for Visible Emissions.
2. Boiler emissions shall be controlled by proper operation and maintenance.
3. All existing emergency CI generators ≤500 HP (Ref. Nos. EG-1 and FP-1) shall be in compliance with 40 CFR Part 63, Subpart ZZZZ by May 3, 2013. These units shall comply with the applicable:
 - Emission limitations as specified in 40 CFR 63.6602, Table 2c;
 - Monitoring, installation, collection, operation and maintenance requirements as specified in 40 CFR 63.6625(e), (f), (h), (i);
 - Continuous compliance requirements as specified in 40 CFR 63.6605 and 63.6640;
 - Recordkeeping requirements as specified in 63.6655 (except 63.6655(c));
 - Reporting requirements as specified in the Footnote 1 of Table 2c; and
4. Requirements of the General Provisions listed in 40 CFR Subpart A, except per 63.6645(a)(5), the following do not apply: 63.7(b) and (c), 63.8(e), (f)(4) and (f)(6), and 63.9(b)-(e), (g) and (h).

B. Monitoring

1. The permittee shall perform monthly visual opacity observations on each boiler (Ref. Nos. 16 and 17) during normal operation to determine compliance with each unit's opacity limit.
2. Records as necessary to demonstrate compliance with 40 CFR 60 Subpart IIII and 40 CFR 63 Subpart ZZZZ for the engines and generators (Ref. Nos. EG-1 and FP-1).

C. Testing

The permit does not require source tests. The Department and EPA has authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

VI. ABRASIVE BLASTING APPLICABLE REQUIREMENTS – (Ref. Nos. 7-15)

A. Limitations

Condition 13 contains requirements from the Shipyard Memorandum of Understanding (MOU).

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

- 9 VAC 5-50-80 and 290, New Source Standard for Visible Emissions.
- 9 VAC 5-40-260, Standard For Particulate Matter.

B. Recordkeeping

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include:

1. Annual throughput of abrasive blast material.
2. Records of wind direction and speed for the outdoor abrasive blasting and spray painting operations.

C. Testing

The permit does not require source tests. The Department and EPA has authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

VII. COATING OPERATION REQUIREMENTS APPLICABLE REQUIREMENTS – (Ref. Nos. 1-6)

A. Limitations

Condition 3: At all times the disposal of volatile organic compounds shall be accomplished by taking measures, to the extent practicable, consistent with air pollution control practices for minimizing emissions. Volatile organic compounds shall not be intentionally spilled, discarded in sewers which are not connected to a treatment plant, or stored in open containers, or handled in any other manner that would result in evaporation beyond that consistent with air pollution practices for minimizing emissions.

Condition 13: Contains requirements from the Shipyard Memorandum of Understanding (MOU).

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

- 9 VAC 5-5-40-3410, Emission Standards For Volatile Organic Compound Storage and Transfer Operations.

A. Recordkeeping

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include:

1. Annual throughput of coating media, as applied to marine vessels and marine parts.
2. Annual throughput of solvents/thinners used to clean the spray guns and associated equipment.
3. Material Safety Data Sheets (MSDS) or other vendor information as approved by DEQ showing the VOC and HAP contents for each coating media and solvent/thinner used.

B. Testing

The permit does not require source tests. The Department and EPA has authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

VIII. DEGREASING OPERATIONS APPLICABLE REQUIREMENTS – (Ref. No. DC)

A. Limitations

1. Vapor control is required for the cold cleaner (Ref. No. DC) to remove, destroy, or prevent the discharge into the atmosphere of at least 85% by weight of volatile organic compound emissions.
2. The following operating procedures for the cold cleaning units (Ref. No. DC) shall be followed:
Waste solvent should not be disposed of or transferred to another party, such that greater than 20% of the waste (by weight) can evaporate to the atmosphere. Waste solvent shall be stored in closed containers only.
The cold cleaning unit cover should be closed whenever not handling parts in the cold cleaner.
Cleaned parts should drain for at least 15 seconds or until dripping ceases.
3. Disposal of waste solvent from the cold cleaning units (Ref. No. DC) shall be done by one of the following:
Reclamation (either by outside services or in-house), or
Incineration by approved company.

The following Virginia Administrative Codes that have specific emission requirements have been determined to be applicable:

9 VAC 5-40-3260, Emission Standards For Solvent Metal Cleaning Operations Using Non-Halogenated Solvents.

B. Monitoring

1. The degreasing unit (Ref. No. DC) will be inspected once per calendar year to ensure that the label with the operating procedures is placed on or near each degreasing unit.
2. The degreasing unit (Ref. No. DC) will be inspected once per calendar year to ensure that each has a cover or enclosed remote reservoir, and waste solvent from each unit is stored in closed containers.

C. Recordkeeping

The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include :

1. Annual inspection results and any corrective actions taken;
2. Method(s) of waste solvent disposal.

D. Testing

The permit does not require source tests. The Department and EPA has authority to require testing not included in this permit if necessary to determine compliance with an emission limit or standard.

IX. MACT, Subpart II Shipbuilding and Repair Requirements

A. Limitations

1. Each owner or operator shall ensure that:
All handling and transfer of VOHAP-containing materials to and from containers, tanks, vats, drums, and piping systems is conducted in a manner that minimizes spills.
All containers, tanks, vats, drums, and piping systems are free of cracks, holes, and other defects and remain closed unless materials are being added to or removed from them.
(9 VAC 5-60-100, 9 VAC 5-80-110, and 40 CFR 63.783(b))
2. The shipbuilding and ship repair operation is to be operated in compliance with the requirements of 40 CFR 63 Subpart II (Shipbuilding and Ship Repair (Surface Coating)) and the general provisions of 40 CFR 63 Subpart A, as specified in Table 1 of 40 CFR 63 Subpart II.
(9 VAC 5-60-100, 9 VAC 5-80-110, and 40 CFR 63.780)
3. The provisions of 40 CFR Part 63, Subpart II do not apply to “low-usage exempt” coatings used in volumes of less than 52.8 gallons per year for each coating, and 264 gallons per year of all such coatings. Coatings exempt under this condition shall be clearly labeled as “low-usage exempt”.
(9 VAC 5-60-100, 9 VAC 5-80-110, and 40 CFR 63.781(b))
4. The provisions of 40 CFR Part 63 Subpart A pertaining to startups, shutdowns, and malfunctions and continuous monitoring do not apply unless an add-on control system is used to comply with 40 CFR Part 63 Subpart II.
(9 VAC 5-60-100, 9 VAC 5-80-110, and 40 CFR 63.781(d))
5. No owner or operator shall cause or allow the application of any coating to a ship with an as-applied Volatile Organic Hazardous Air Pollutant (VOHAP) content exceeding the applicable limit given in Table 2 of 40 CFR part 63 Subpart II.
(9 VAC 5-60-100, 9 VAC 5-80-110, and 40 CFR 63.783(a))

B. Compliance Procedures

1. For each batch of coating that is received, the owner or operator shall:
Determine the coating category and the applicable VOHAP limit as specified in 40 CFR 63.783(a).
Certify the as-supplied VOC content of the batch of coating.
(9 VAC 5-60-100, 9 VAC 5-80-110, and 40 CFR 63.785(a))

2. In lieu of testing each batch of coating, as applied, the owner or operator may determine compliance with the VOHAP limits using any combination of the procedures described in 40 CFR 63.785 (c)(1), (c)(2), (c)(3), and (c)(4). The procedure used for each coating shall be determined and documented prior to application.
(9 VAC 5-60-100, 9 VAC 5-80-110, and 40 CFR 63.785(b)(1))
3. The results of any compliance demonstration using Method 24 shall take precedence over the results using the procedures in 40 CFR 63.785 (c)(1), (c)(2), or (c)(3).
(9 VAC 5-60-100, 9 VAC 5-80-110, and 40 CFR 63.785(b)(2))
4. The results of any compliance demonstration conducted using an approved test method to determine VOHAP content shall take precedence over the results using the procedures in 40 CFR 63.785(c)(4).
(9 VAC 5-60-100, 9 VAC 5-80-110, and 40 CFR 63.785(b)(3))

C. Monitoring, Recordkeeping, and Reporting

1. For each compliance procedure used (40 CFR 63.785(c)(1), (2), (3), and (4)), the permittee shall maintain records to demonstrate compliance with the chosen procedure.
(9 VAC 5-80-110 and 40 CFR 63.788(b)(2) and (3))
2. Each owner or operator shall comply with the applicable recordkeeping and reporting requirements in 40 CFR 63.10(a), (b), (d), and (f).
(9 VAC 5-60-100, 9 VAC 5-80-110, and 40 CFR 63.788(a))
3. Each owner or operator of a major source shipbuilding or ship repair facility having surface coating operations with less than 264 gallons annual marine coating usage shall record the total volume of coating applied at the source to ships. Such records shall be compiled monthly and maintained for a minimum of 5 years.
(9 VAC 5-60-100, 9 VAC 5-80-110, and 40 CFR 63.788(b)(1))
4. Each owner or operator of an affected source shall compile records on a monthly basis and maintain those records for a minimum of 5 years. At a minimum, these records shall include:
 - All documentation supporting initial notification;
 - A copy of the affected source's implementation plan;
 - The volume of each low-usage-exempt coating applied;
 - Identification of the coating used, their appropriate coating categories, and the applicable VOHAP limit;
 - Certification of the as-supplied VOC content of each batch of coating;
 - A determination of whether containers meet the standards as described in 40 CFR 63.783(b)(2);
 - and
 - The results of any Method 24 of Appendix A or 40 CFR Part 60 or approved VOHAP measurement test conducted on individual containers of coating, as applied.Any additional information, as determined by the compliance procedure(s) described in 40 CFR 63.785(c) that the permittee followed.
(9 VAC 5-60-100, 9 VAC 5-80-110, 40 CFR 63.788 (b)(2), and 40 CFR 63.788 (b)(3))
5. If the owner or operator detects a violation of the standard specified in 40 CFR 63.783, the owner or operator shall, for the remainder of the reporting period during which the violation(s) occurred, include the information listed in 40 CFR 63.788 (b)(4) in the facility records.
(9 VAC 5-60-100, 9 VAC 5-80-110, and 40 CFR 63.788 (b)(4))

X. GENERAL CONDITIONS

The permit contains general conditions required by 40 CFR Part 70 and 9 VAC 5-80-110 that apply to all Federal-operating permitted sources. These include requirements for submitting semi-annual monitoring reports and an annual compliance certification report. The permit also requires notification of deviations from permit requirements or any excess emissions.

1. Comments on General Conditions Condition B. Permit Expiration

This condition refers to the Board taking action on a permit application. The Board is the State Air Pollution Control Board. The authority to take action on permit application(s) has been delegated to the Regions as allowed by §2.2-604 and §10.1-1185 of the *Code of Virginia*, and the “Department of Environmental Quality Agency Policy Statement No. 2-09”.

This general condition cite(s) the Article(s) that follow(s):
Article 1 (9 VAC 5-80-50 et seq.), Part II of 9 VAC 5 Chapter 80. Federal Operating Permits for Stationary Sources

This general condition cites the sections that follow:

9 VAC 5-80-80. Application
9 VAC 5-80-140. Permit Shield
9 VAC 5-80-150. Action on Permit Applications
Condition F. Failure/Malfunction Reporting

Section 9 VAC 5-20-180 requires malfunction and excess emission reporting within four hours of discovery. Section 9 VAC 5-80-250 of the Title V regulations also requires malfunction reporting; however, reporting is required within two days. Section 9 VAC 5-20-180 is from the general regulations. All affected facilities are subject to section 9 VAC 5-20-180 including Title V facilities. Section 9 VAC 5-80-250 is from the Title V regulations. Title V facilities are subject to both sections. A facility may make a single report that meets the requirements of 9 VAC 5-20-180 and 9 VAC 5-80-250. The report must be made within four daytime business hours of discovery of the malfunction.

Condition J. Permit Modification

This general condition cites the sections that follow:

9 VAC 5-80-50. Applicability, Federal Operating Permit For Stationary Sources
9 VAC 5-80-190. Changes to Permits.
9 VAC 5-80-260. Enforcement.
9 VAC 5-80-1100. Applicability, Permits For New and Modified Stationary Sources
9 VAC 5-80-1790. Applicability, Permits For Major Stationary Sources and Modifications Located in Prevention of Significant Deterioration Areas
Condition U. Malfunction as an Affirmative Defense

The regulations contain two reporting requirements for malfunctions that coincide. The reporting requirements are listed in sections 9 VAC 5-80-250 and 9 VAC 5-20-180. The malfunction requirements are listed in General Condition U and General Condition F. For further explanation

see the comments on general condition F.

This general condition cites the sections that follow:

9 VAC 5-20-180. Facility and Control Equipment Maintenance or Malfunction

9 VAC 5-80-110. Permit Content

Condition Y. Asbestos Requirements

The Virginia Department of Labor and Industry under Section 40.1-51.20 of the Code of Virginia also holds authority to enforce 40 CFR 61 Subpart M, National Emission Standards for Asbestos.

This general condition contains a citation from the Code of Federal Regulations that follow:

40 CFR 61.145, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to demolition and renovation.

40 CFR 61.148, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to insulating materials.

40 CFR 61.150, NESHAP Subpart M. National Emissions Standards for Asbestos as it applies to waste disposal.

This general condition cites the regulatory sections that follow:

9 VAC 5-60-70. Designated Emissions Standards

9 VAC 5-80-110. Permit Content

XI. STATE ONLY APPLICABLE REQUIREMENTS

The following Virginia Administrative Codes have specific requirements only enforceable by the State and have been identified as applicable by the applicant:

9 VAC 5, Chapter 40, Part II, Article 2: Emissions Standards for Odor

9 VAC 5, Chapter 50, Part II, Article 2: Standards of Performance for Odorous Emissions

9 VAC 5, Chapter 60, Part II, Article 4: Emission Standards for Toxic Pollutants from Existing Sources

9 VAC 5, Chapter 60, Part II, Article 5: Emission Standards for Toxic Pollutants from New and Modified Sources

XII. FUTURE APPLICABLE REQUIREMENTS

The facility is a major source of hazardous air pollutants. National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, And Institutional Boilers, and Process Heaters, under 40 CFR Part 63, promulgation has been delayed until further notice. The facility will be subject to those requirements when promulgated.

XIII. INAPPLICABLE REQUIREMENTS

There are no applicable GHG permitting requirements.

After July 1, 2011, sources that emit over 100,000 tpy CO₂e and have a CO₂e mass equivalent to 100 tpy are required to have a Title V permit even if they are not Title V major for any criteria pollutant or HAP. Additionally, any source that increases their CO₂e emissions more than 75,000 tpy as a result of a modification is required to address their CO₂e emissions as part of the Title V permit.

The startup, shut down, and malfunction opacity exclusion listed in 9 VAC 5-40-20 A 4 cannot be included in any Title V permit. This portion of the regulation is not part of the federally approved state implementation plan. The opacity standard applies to existing sources at all times including startup, shutdown, and malfunction. Opacity exceedances during malfunction can be affirmatively defended provided all requirements of the affirmative defense section of this permit are met. Opacity exceedances during startup and shut down will be reviewed with enforcement discretion using the requirements of 9 VAC 5-40-20 E, which state that "At all times, including periods of startup, shutdown, soot blowing and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions."

XIV. INSIGNIFICANT EMISSION UNITS

The insignificant emission units are presumed to be in compliance with all requirements of the Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.

Insignificant emission units include the following:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
BO-3	Pangborne ES-1885-32 Roboblast	9 VAC 5-80-720.B.1	PM	5 tons/yr
WW	Wood Working Shop	9 VAC 5-80-720.B.1	PM	3 tons/yr
MF	Metal Fabrication	9 VAC 5-80-720.B.1	PM	
PW	Portable Gasoline/Diesel Fired Power Washer	9 VAC 5-80-720.B.1	PM, SO ₂ , CO, NO _x	

¹The citation criteria for insignificant activities are as follows:

- 9 VAC 5-80-720 A - Listed Insignificant Activity, Not Included in Permit Application
- 9 VAC 5-80-720 B - Insignificant due to emission levels
- 9 VAC 5-80-720 C - Insignificant due to size or production rate

XV. CONFIDENTIAL INFORMATION

The permittee did not submit a request for confidentiality. All portions of the Title V application are suitable for public review.

XVI. PUBLIC PARTICIPATION

The proposed permit will be place on public notice in the Virginian-Pilot from Wednesday, July 25, 2012 to Friday, August 24, 2012.