

Texas Commission on Environmental Quality
INTEROFFICE MEMORANDUM

TO: Office of Chief Clerk **Date:** April 21, 2026

THRU: Amy Browning
Acting Deputy Director
Environmental Law Division

FROM: Elizabeth Black
Staff Attorney
Environmental Law Division

SUBJECT: Backup Documents Filed for Consideration of Hearing Requests at
Agenda

Applicant: Sienna Shipyards,LLC
Permit No.: 109892
Program: Air
Docket No.: TCEQ Docket No. 2026-0415-AIR

Enclosed please find a copy of the following documents for inclusion in the background material for this permit application:

- The final draft of the permit Special Conditions
- The Emission Sources - Maximum Allowable Emission Rates
- The Permit Renewal Source Analysis & Technical Review
- The Compliance History Report

Special Conditions

Permit Number 109892

1. This permit authorizes outdoor surface coating and dry abrasive blast cleaning facilities used for the maintenance of marine barges. These facilities are located at 615 Georgia Avenue, Orange, Orange County. This permit covers only those sources of emissions listed in the attached table entitled "Emission Sources - Maximum Allowable Emission Rates," and those sources are limited to the emission limits and other conditions specified in the attached table. The annual emission limits are based on any consecutive 12-month period.
2. This permit does not include the facilities or planned maintenance, startup or shutdown (MSS) activities at the site specified in Attachment I of this permit, except as noted in the maximum allowable emission rates table (MAERT). Instead, these facilities are authorized under a Permit by Rule (PBR) by Title 30 Texas Administrative Code Chapter 106 (30 TAC Chapter 106) or are a de minimis source listed under 30 TAC § 116.119. The lists in Attachment I are not intended to be all-inclusive and can be altered at the site without modifications to this permit.
3. The PBRs available in 30 TAC § 106.452 (Dry Abrasive Cleaning) and 30 TAC § 106.433 (Surface Coat Facility) shall not be used to authorize any additional non-enclosed dry abrasive blast cleaning or painting facilities or changes to non-enclosed dry abrasive blast cleaning or painting facilities at the site.
4. A copy of this permit shall be kept at the site and made available at the request of personnel from the Texas Commission on Environmental Quality (TCEQ) or any other air pollution control agency with jurisdiction.
5. With the exception of fugitive sources, the holder of this permit shall clearly label all equipment at the property that has the potential of emitting air contaminants. Permitted emission points shall be clearly labeled corresponding to the emission point numbering on the MAERT.

Emission Limitations

6. No visible emissions shall cross the property line at any time. This determination shall be made as follows.
 - A. Observe for visible emissions while surface coating or blasting operations are ongoing. Observations shall be made along the property line nearest to the drydock. Contributions from uncombined water shall not be included in determining compliance with this condition.
 - B. Observations shall be performed and recorded quarterly. If visible emissions are observed crossing the property line, identification of the source and cause of the visible emissions shall be conducted within 24 hours and documented.
 - C. Corrective action to eliminate the cause of visible emissions shall be taken promptly. Corrective action shall be documented within one week of first observation of the visible emissions. After corrective action has been taken, another visible emissions observation shall be performed and recorded to ensure the visible emissions have been eliminated.
7. The surface coating operations at the site shall comply with the National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, Title 40 CFR Part 63, Subpart HHHHHH, if any surface coating contains any one of the following hazardous air pollutants:

- A. Chromium, lead, nickel or cadmium compounds with a concentration greater than or equal to 0.1 percent by mass; or
 - B. Manganese compounds with a concentration greater than or equal to 1.0 percent by mass.
8. All coatings used in the facilities covered by this permit shall comply with the individual volatile organic compound (VOC) content limits specified in 30 TAC § 115.421(16) for Marine Coatings less water and exempt solvents regardless of whether the facilities would otherwise qualify for exemption under 30 TAC § 115.427(3)(H). Compliance with the individual VOC content limits of 30 TAC § 115.421(16) shall be demonstrated on a monthly weighted average basis for all coatings and solvents “as mixed” and applied.
 9. Emissions from the facilities shall comply with 30 TAC § 101.4 regarding nuisance. If compliance with 30 TAC § 101.4 so requires, the permit shall be amended to control nuisance-causing emissions either through process controls or additional emission controls, regardless of whether or not the emissions are judged to be of sufficient concentration and duration as to constitute a nuisance.
 10. The site shall comply with 30 TAC § 115.453(d)(1) and (d)(2) regardless of whether the facilities would otherwise be subject to these requirements.

Operational Limitations

11. Surface coating operations include the spray application of surface coatings, the application of surface coatings using brushes and/or rollers, all cleanup activities involving the use of solvent, the mixing of various surface coatings, the thinning of various surface coatings and solvents, the drying of surface coatings, and all cleanup activities involving the use of solvent..
12. All surface coating operations shall be restricted to the designated dry dock area (EPN DRYDOCK) and shall be performed according to the following requirements:
 - A. Airless spray application equipment or other equipment that is demonstrated to reach the same or higher transfer efficiency shall be used for all spray application of surface coatings. This equipment shall be operated and maintained within the limits set forth by the manufacturer.
 - B. Only commercial marine vessels (non-pleasure craft) may be surface coated at the site.
 - C. All surface coating operations except as specified, are restricted to the dry dock area (EPN DRYDOCK) and shall be conducted within either a three- or four-sided shroud. The shroud shall meet the following requirements:
 - (1) The shroud shall be installed up to a minimum height of 28 feet above the dry dock floor;
 - (2) The height of surface coating performed on a vessel (or vessel parts) shall not exceed 17 feet above the dry dock floor;
 - (3) Each side of the side of the shroud shall be positioned such that the bottom touches the dry dock floor;
 - (4) The shroud shall be wider than the marine vessel being surface coated;

- (5) The shroud shall have overlapping seams to prevent the leakage of particulate matter (PM). There shall be no holes or tears in the shroud that allow the leakage of PM;
 - (6) The shroud shall have a shade factor of at least 85 percent. Shade factor is defined as the percent of area impermeable to particles or sunlight; and
 - (7) Any maintenance and/or repairs made to the shroud shall be recorded in a log book.
 - D. The surface coating usage rate shall not exceed 10 gallons per hour at the site.
 - E. Each marine vessel shall remain within the shrouded area (EPN DRYDOCK) for a minimum of 12 hours after being surface coated.
 - F. All cleanup activities and all mixing and thinning of surface coatings are restricted to the dry dock area (EPN DRYDOCK) and the paint cleanup area (EPN CLEANUP).
13. Abrasive blasting operations include the filling of blast pots, the abrasive blasting of marine vessels and marine vessel parts, and all cleanup activities involving blast media (spent or fresh media).
14. The abrasive blasting operations are limited to the following operating conditions.
 - A. Authorized dry abrasive blast media includes coal slag, steel grit or shot, and garnet. Other blast media may be used provided that it does not contain:
 - (1) asbestos;
 - (2) crystalline silica at equal to or greater than one (1) percent (weight) of total particulate weight; or
 - (3) metals and metal compounds with a short-term effects screening level (ESL) of less than 50 $\mu\text{g}/\text{m}^3$ that are in a concentration of greater than 2.0 percent.
 - B. All abrasive blasting operations are restricted to the dry dock area (EPN DRYDOCK) and shall be conducted within a three- or four-sided shroud. The shroud shall meet the following requirements:
 - (1) The shroud shall be installed up to a minimum height of 28 feet above the dry dock floor;
 - (2) The height of abrasive blasting performed on a structure shall not exceed 17 feet above the dry dock floor;
 - (3) Each side of the side of the shroud shall be positioned such that the bottom touches the dry dock floor;
 - (4) The shroud shall be wider than the marine vessel being abrasively blasted;
 - (5) The shroud shall have overlapping seams to prevent the leakage of PM. There shall be no holes or tears in the shroud that allow the leakage of PM;
 - (6) The shroud shall have a shade factor of at least 85 percent; and
 - (7) Any maintenance and/or repairs made to the shroud shall be recorded in a log book.
 - C. The usage of abrasive blast media shall not exceed 2,000 pounds per hour (lbs/hr).

Material Usage Flexibility

15. In addition to the approved materials, the use of new materials or products that meet all of the following sub-conditions are allowed. Pollutants from categories of air pollutants not currently authorized on the MAERT cannot be authorized using this special condition.
- A. The new materials shall serve the same basic function, and the emissions shall be from the same location as the emissions from the current materials.
 - B. All the ingredients of the new material, product, or compound shall be known; i.e., the weight percentages of the ingredients add to 100 percent or more.
 - C. The maximum hourly (short-term) or annual emission rates from new or existing air contaminant ingredients (aka air contaminants) shall not cause any increases in the short-term or annual emission rates as listed on the MAERT.
 - D. Emissions from the new material shall only be from the emission points represented in the table provided in paragraph G(2) of this special condition.
 - E. Any air contaminant in the new material is exempt from paragraphs E through H of this special condition if the air contaminant is currently authorized under this permit and the proposed emission rate from each EPN is less than or equal to the authorized emission rate from the same EPN.
 - F. Any air contaminant ingredient in the new material is exempt from paragraph G and H if:
 - (1) it is emitted at a rate and has a short-term ESL and an annual ESL as stated in the following table; or

Emission Rate (lbs/hr)	Short-term ESL ($\mu\text{g}/\text{m}^3$)	Annual ESL ($\mu\text{g}/\text{m}^3$)
≤ 0.04	≥ 2 and < 500	≥ 0.2 and < 50
≤ 0.10	≥ 500 and $< 3,500$	≥ 50 and < 350
≤ 0.40	$\geq 3,500$	≥ 350

- (2) it is not sprayed and it has at least one of the following physical characteristics:
 - (a) a true vapor pressure at 68°F of less than 0.01 mm Hg (0.0002 psi);
 - (b) a boiling point at atmospheric pressure that is above 400°F (204°C), provided the compound is not heated above room temperature in the process; or
 - (c) a molecular weight that is above 200 g/g-mol, provided the compound is not heated above room temperature in the process.
- G. For all other new or increases in existing air contaminants, the following procedure shall be completed to determine if the short-term impacts are acceptable.
 - (1) Determine the emission rate of each air contaminant ingredient including emissions of the same air contaminant (if an existing air contaminant) from the currently authorized materials that may be emitted at the same time from each emission point.

- (2) Multiply the emission rate of the air contaminant by the appropriate unit impact multiplier to determine the short-term off-property impact Ground Level Concentration (GLC)_{MAX} at the site.

Emission Point Number	Unit Impacts (µg/m ³ per lb/hr)
DRYDOCK	31.1 *
CLEANUP	2977.6 **

* Unit impact multiplier (259.3 µg/m³ per lb/hr) with 0.6 fugitive factor, 0.3 shroud factor, and 0.67 low wind speed adjustment factor applied.

** Unit impact multiplier (7,407 µg/m³ per lb/hr) with 0.6 fugitive factor and 0.67 low wind speed adjustment factor applied.

Note: The ground level concentrations for EPNs DRYDOCK and CLEANUP are not summed since the application of surface coatings and the cleanup activities do not occur simultaneously.

- (3) Sum the impacts from each emission point/emission point group to determine a total short-term off-property impact (Total GLC_{MAX}) for the new or existing air contaminant.
- (4) Compare the total short-term off-property impact to the short-term ESL for the air contaminant as shown below to determine if it is less than or equal to the ESL. If the total off-property impact exceeds the short-term ESL, then a permit amendment is required to authorize the emission rate for the air contaminant.

$$\text{Total GLC}_{\text{MAX}} \leq \text{ESL}_{\text{SHORT}}$$

Where:

ESL_{SHORT} = The short-term ESL of the new or existing air contaminant from the most current set of ESLs available through the TCEQ Toxicity Factor Database and the date of the database retrieval or as specifically derived by the TCEQ Toxicology Division. The ESL shall be obtained in writing prior to use of the new or increased air contaminant.

- H. For all other new air contaminants or increases in existing air contaminants, the following procedure shall be completed to determine if the annual impacts are acceptable.
- (1) Determine the annual emission rate (tpy) of each air contaminant including emissions of the same air contaminant (if an existing air contaminant) from the currently authorized materials that may be emitted at the same time from each emission point.
 - (2) Convert the annual emission rate to an hourly emission rate using 8760 hours per year and 2000 pounds per ton.
 - (3) Multiply the hourly emission rate (lb/hr) of the air contaminant determined in paragraph H(2) of this special condition by the unit impact multiplier for each emission point from the table provided in paragraph G(2) of this special condition to determine the off-property impact GLC_{MAX} for each emission point.
 - (4) Sum the impacts from each emission point to determine a total off-property impact (Total GLC_{MAX}) for the new or existing air contaminant.

- (5) Multiply the total off-property impact (Total GLC_{MAX}) determined in paragraph H(4) of this special condition by 0.08 to determine the annual off-property impact (Annual GLC_{MAX}) for the new or existing air contaminant.
- (6) Compare the annual off-property impact to the annual ESL for the air contaminant as shown below to determine if it is less than or equal to the ESL. If the annual off-property impact exceeds the annual ESL, then a permit amendment is required to authorize the emission rates for the air contaminant.

$$\text{Annual } GLC_{MAX} \leq ESL_{ANNUAL}$$

Where:

ESL_{ANNUAL} = The annual ESL of the new or existing air contaminant from the most current set of ESLs available through the TCEQ Toxicity Factor Database or as specifically derived by the TCEQ Toxicology Division.

- I. The short-term or annual emission rates from new or existing air contaminants shall not cause any increases in the short-term or annual emission rates as listed on the MAERT.
- J. Use of any new or replacement compound/product that cannot satisfy the procedures outlined in this condition shall require authorization through an appropriate permit action in 30 TAC Chapter 116.

Recordkeeping

16. General Condition No. 7 regarding information and data to be maintained on file is supplemented as follows and shall be used to demonstrate compliance with the special conditions and the MAERT:
 - A. Environmental Data Sheets (EDS) or similar documentation (including material safety data sheets) for all surface coatings, cleaning solvents, thinners, and dry abrasive blast media. The EDS or similar documentation for materials shall indicate the maximum composition of all constituents. The EDS or similar documentation shall be kept on-site and made available for review upon request to representatives of the TCEQ or any air pollution control agency with appropriate jurisdiction.
 - B. Data shall be recorded as follows:
 - (1) Daily total as-applied gallons of surface coatings, solvents, and thinners used in the dry dock area (EPN DRYDOCK).
 - (2) Daily total pounds of dry blast media used in the dry dock area (EPN DRYDOCK).
 - (3) Daily hours and times of day of painting operations in the dry dock area (EPN DRYDOCK).
 - (4) Daily hours of dry blasting operations in the dry dock area (EPN DRYDOCK).
 - (5) As applied coating VOC content for each surface coating and solvent used in the painting operations.
 - C. The data recorded in paragraph B shall be used to produce a monthly summary that reflects:

- (1) For each EPN, the emissions of VOCs and PM in lbs/hr as a daily average. The hourly emission rates may be determined by calculating the daily VOC, exempt solvent, and PM emissions and dividing by the actual daily hours of operation;
 - (2) Emissions of VOC and PM in tons per year (tpy) over the previous 12-month period; and
 - (3) Hazardous Air Pollutant (HAP) emissions in tpy over the previous 12-month period for each individual HAP and total HAPs.
- D. Records in sufficient detail to demonstrate compliance with the material usage rates.
 - E. A demonstration of compliance with the VOC content limits.
 - F. Records of the manufacturer's specifications for the spray equipment.
 - G. Records of any maintenance and repairs made to any of the shrouds.
 - H. Records of manufacturer's specifications for the shade factor of the shrouds.
 - I. Records of addition/replacement of air contaminants showing how the Material Usage Flexibility condition is satisfied and when the addition/replacement occurred.
 - J. Field records of visible emissions observations. Records of any corrective action taken to eliminate any visible emissions crossing the property line.
17. The records required by the special conditions shall be maintained in hard copy or electronic format and shall be maintained for at least two years. The recordkeeping summary required shall contain examples of the calculations performed (including units, conversion factors, transfer efficiency, and emission factors), any assumptions made in the calculations, and the basis for those assumptions. These records shall be kept on-site and made available for review upon request by representatives of the TCEQ or any air pollution control agency with appropriate jurisdiction.

Pollution Prevention

18. All spent dry abrasive blast media shall be collected daily and placed in either an enclosed container, in an enclosed building, or in a pile that is covered with either a tarp or shroud material to prevent wind erosion. The tarp or shroud material that is used to cover piles must not have any holes or tears which would allow the leakage of PM.
19. All spray gun cleanup shall be performed by discharging the cleaning solvent into a container and then closing the container immediately after the completion of gun cleanup.
20. All waste coatings, solvents, and thinners shall be stored in closed containers until removed from the plant site in accordance with applicable waste regulations.
21. All coating, solvent, and thinner spills shall be cleaned up immediately using appropriate procedures, and the associated waste materials shall be stored in closed containers until properly removed from the plant site.
22. Towels, rags, sponges, or other materials used for cleanup operations shall be placed into closed containers immediately after use and shall be kept in storage until removed from the plant site in accordance with applicable waste regulations.

Date: TBD – DRAFT

DRAFT

Attachment I

Permit Number 109892

Planned MSS Activities and Other Authorizations

Source or Activity – PBR	Authorization
Welding, soldering, and brazing equipment	§ 106.227
Manually operated and hand-held equipment	§ 106.265
Diesel fuel storage tanks, gasoline storage tanks, lube oil storage tanks, and loading and unloading	§ 106.472 and/or § 106.473
Maintenance of storage tanks authorized by a PBR	§ 106.472, § 106.473, and/or § 106.474
Abrasive blasting, painting, and surface preparation of storage tanks	§ 106.263(c)(3)

Source or Activity – De Minimis	Authorization
Cleaning and stripping solvents, less than or equal to 50 gallons per year, site-wide	§ 116.119(a)(2)(A)
Water-base surfactants/detergents less than or equal to 2,500 gallons per year, site-wide	§ 116.119(a)(2)(F)
Application of aqueous detergents, surfactants, and other cleaning solutions containing less than 1% of any organic compound by weight	§ 116.119(a)(1)
Application of aqueous detergents, surfactants, and other cleaning solutions containing not more than one percent of any organic compound by weight or containing not more than five percent of any organic compound with a vapor pressure less than 0.002 pounds per square inch absolute	§ 116.119(a)(1)
Manual application of cleaning or stripping solutions or coatings for maintenance	§ 116.119(a)(1)
Glove box/self-contained abrasive blasting and associated filter replacement	§ 116.119(a)(1)
Blast cleaning operations with water as the cleaning media	§ 116.119(a)(1)
Usage of organic chemicals including lubricants, greases, and oils without propellants other than air or nitrogen for maintaining equipment	§ 116.119(a)(1)
Application of lubricants for maintaining equipment	§ 116.119(a)(1)
Office equipment maintenance and cleaning (printers, copiers, etc.)	§ 116.119(a)(1)
Maintenance and cleaning of in-situ computer and office equipment	§ 116.119(a)(1)
Janitorial and maid services	§ 116.119(a)(1)
Grounds maintenance and landscaping	§ 116.119(a)(1)

Source or Activity – De Minimis	Authorization
Maintenance of heating and cooling equipment for personal use	§ 116.119(a)(1)
Comfort air conditioning or comfort ventilation systems which are not used to remove air contaminants generated by or released from specific units or equipment	§ 116.119(a)(1)
Maintenance of equipment by hydraulic or hydrostatic testing	§ 116.119(a)(1)
Application of argon, ethane, helium, hydrogen, methane, neon, nitrogen, and propane for testing, purging, and leak checking of equipment	§ 116.119(a)(1)
Aerosol product use – less than 4 cans (64 oz) per day – 12 month rolling average	§ 116.119(a)(1)
Aerosol can puncturing, recycling, and disposal – less than 40 cans per 24-hour period	§ 116.119(a)(1)
Pesticide and insecticide use and fumigation	§ 116.119(a)(1)

Date: TBD – DRAFT

Emission Sources - Maximum Allowable Emission Rates

Permit Number 109892

This table lists the maximum allowable emission rates and all sources of air contaminants on the applicant's property covered by this permit. The emission rates shown are those derived from information submitted as part of the application for permit and are the maximum rates allowed for these facilities, sources, and related activities. Any proposed increase in emission rates may require an application for a modification of the facilities covered by this permit.

Air Contaminants Data

Emission Point No. (1)	Source Name (2)	Air Contaminant Name (3)	Emission Rates (5)	
			lbs/hour	TPY (4)
DRYDOCK	Barge Dry Dock - Abrasive Blasting Operations	PM	5.72	5.76
		PM ₁₀	0.68	0.70
		PM _{2.5}	0.10	0.10
	Barge Dry Dock – Surface Coating Operations	VOC	32.01	12.05
		PM	0.84	0.29
		PM ₁₀	0.05	0.02
		PM _{2.5}	<0.01	<0.01
CLEANUP	Paint Cleanup Area	VOC	5.58	0.34
All Emission Points as the Site	All Sources at the Site	Single HAP	--	<10.00
		All HAPS	--	<25.00

- (1) Emission point identification - either specific equipment designation or emission point number from plot plan.
- (2) Specific point source name. For fugitive sources, use area name or fugitive source name.
- (3) VOC - volatile organic compounds as defined in Title 30 Texas Administrative Code § 101.1
- PM - total particulate matter, suspended in the atmosphere, including PM₁₀ and PM_{2.5}, as represented
- PM₁₀ - total particulate matter equal to or less than 10 microns in diameter, including PM_{2.5}, as represented
- PM_{2.5} - particulate matter equal to or less than 2.5 microns in diameter
- HAP - hazardous air pollutant as listed in § 112(b) of the Federal Clean Air Act or Title 40 Code of Federal Regulations Part 63, Subpart C
- (4) Compliance with annual emission limits (tons per year) is based on a 12 month rolling period.
- (5) Emission rates include planned maintenance, startup, and shutdown (MSS) emissions.

Date: TBD - DRAFT

Permit Renewal Source Analysis & Technical Review

Company	Sienna Shipyards, LLC	Permit Number	109892
City	Orange	Project Number	377229
County	Orange	Regulated Entity Number	RN105567176
Project Type	Renewal	Customer Reference Number	CN603849076
Project Reviewer	Miyah Calhoun	Received Date	July 30, 2024
Site Name	Marine Vessel Maintenance Facility		

Project Overview

Sienna Shipyards, LLC (Sienna) operates a marine vessel maintenance facility located in Orange, Orange County. Sienna has requested renewal of their air permit which authorizes emissions associated with abrasive blasting and painting of commercial marine vessels (e.g., barges). All of the repair activities are performed outdoors with most of the activities occurring in the shrouded dry dock area where the vessels are placed.

Planned maintenance, startup, and shutdown (MSS) activities are either included in the authorized emissions for the permit, qualify as de minimis sources under 30 TAC § 116.119, or meet the requirements for a PBR under 30 TAC Chapter 106.

Emission Summary

Air Contaminant	Current Allowable Emission Rates (tpy)	Proposed Allowable Emission Rates (tpy)	Change in Allowable Emission Rates (tpy)
PM	6.05	6.05	0.00
PM ₁₀	0.72	0.72	0.00
PM _{2.5}	0.11	0.11	0.00
VOC	12.39	12.39	0.00
HAPs	<10(individual)/<25(total)	<10(individual)/<25(total)	0.00

Compliance History Evaluation - 30 TAC Chapter 60 Rules

A compliance history report was reviewed on:	February 5, 2026
Site rating & classification:	2.86 / Satisfactory
Company rating & classification:	2.86 / Satisfactory
Has the permit changed on the basis of the compliance history or rating?	No
Did the Regional Office have any comments? If so, explain.	No

Public Notice Information

Requirement	Date
Legislator letters mailed	8/8/2024
Date 1 st notice published	9/21/2024
Publication Name: Orange Leader	
Pollutants: organic compounds, hazardous air pollutants, and particulate matter including particulate matter with diameters of 10 microns or less and 2.5 microns or less	
Date 1 st notice Alternate Language published	9/19/2024
Publication Name (Alternate Language): El Perico	

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Requirement	Date
1 st public notice tearsheet(s) received	9/24/2024
1 st public notice affidavit(s) received	9/24/2024
1 st public notice certification of sign posting/application availability received	10/30/2024

Public Interest

Public Interest Information	
Number of comments received	2
Number of meeting requests received	0
Number of hearing requests received	2
Date meeting held	N/A
Date response to comments filed with OCC	
Date of SOAH hearing	

Renewal Requirements

Requirement	
Date of permit expiration:	1/30/2025
Date written notice of review was mailed:	12/11/2023
Was there a condition of air pollution that had to be addressed during this project review?	No
Permit Renewal Fee:	\$1344.52

Federal Rules Applicability

Requirement	
Subject to NSPS?	No
NSPS does not apply to this site type since there are no NSPS promulgated for the facilities used for outdoor painting and abrasive blasting.	
Subject to NESHAP?	No
NESHAPs does not apply to this operation since the facility does not emit any air contaminants regulated under 40 CFR 61.	
Subject to NESHAP (MACT) for source categories?	No
Subpart II (National Emission Standards for Shipbuilding and Ship Repair (Surface Coating)) does not apply to this site since it is not a major source of HAPs.	

Title V Applicability

Requirement	
Title V applicability:	
The facility is not a major source of HAPs or criteria pollutants, and thus Title V is not applicable.	

Permit Renewal

Source Analysis & Technical Review

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Requirement

Periodic Monitoring (PM) applicability:

Periodic monitoring is not applicable because this site is not a major source and is not subject to 30 TAC Chapter 122. However, visible emissions observations and detailed recordkeeping are used to demonstrate compliance with the permit limits.

Compliance Assurance Monitoring (CAM) applicability:

CAM is not applicable because this site is not subject to 30 TAC Chapter 122.

Process Description

At the Sienna site, commercial marine vessels in need of repair are brought in and set up in the dry dock area (EPN DRYDOCK) which is located outdoors. The dry dock will float on top of the water which is about four feet below ground level. The dry dock will be equipped with a three-sided shroud which will be a minimum of 28 feet high (or 24 feet above ground level). The shroud will be used to help disperse emissions upwards when any abrasive blasting or painting activities are being performed. The shroud material shall have a shade factor of at least 85%.

After the vessel is placed in the dry dock area, it is abrasively blasted using coal slag as the blast media. Painting of the vessel is then performed using high transfer efficiency application equipment (*i.e.*, airless spray guns, brushes, rollers). The vessel will remain in place until all of the paint has fully cured and/or dried. Various other repairs (*e.g.*, welding) on the vessels may occur as well at the site. These activities are authorized via PBR.

All paint mixing, thinning, and cleanup activities (*e.g.*, spray gun cleaning) will occur within either the paint cleanup area (EPN CLEANUP) or in the dry dock area (EPN DRYDOCK). Solvents used for gun cleaning will be captured in a container and either reused or disposed of in accordance with applicable rules. Any other spent solvent will be collected and placed in a closed container for storage prior to shipment off-site for disposal. Waste blast media will be manually recovered and disposed of properly.

Paints, thinners, and solvents are received in either a 55-gallon drum or in 1-gallon and 5-gallon containers and stored in a small building located near the paint cleanup area. Blast media is received in bags and stored in a shed.

Planned MSS

All of the planned MSS activities at the site are authorized under a PBR (30 TAC Chapter 106), as a de Minimis source (30 TAC § 116.119), or are already included in this permit. This permit includes a list of the PBR and de Minimis sources as Attachment I. The following describes the MSS activities authorized by this permit. The startup and shutdown of the abrasive blasting and coating operations have no emissions that are different in character (composition) than the emissions during the normal operations and the emissions are intrinsically less than normal operation. The annual emissions from startup and shutdown of the abrasive blasting and coating operations are included in the normal operation emission calculations since they are based on the maximum amount of abrasive blast media, coating, and solvent that may be used in an hour and on an annual basis.

Best Available Control Technology

Source Name	EPN	Best Available Control Technology Description
Painting Operations	OP	Use of low VOC content coatings which meet the requirements of 30 TAC §115.453. Use of high transfer efficiency application equipment: airless or brushes and rollers. Good housekeeping and best management practices. The proposed operations and associated equipment are conducted within an area greater than 100,000 cubic feet.
Abrasive Blasting Operations		Use of low dusting abrasives (coal slag and copper slag).

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Source Name	EPN	Best Available Control Technology Description
		Use of with a shade factor shall be 85% or greater. Good housekeeping for spills. There shall be no visible emissions crossing the property line. The proposed operations and associated equipment are conducted within an area greater than 100,000 cubic feet.
Cleanup		Good housekeeping and best management practices.

Review Summary

Impacts Evaluation - 30 TAC 116.111(a)(2)(J)

Was modeling conducted?	Yes	Type of Modeling:	Screen3
Is the site within 3,000 feet of any school?			No

Previously the site was modeled with a worst-case scenario of all emissions exhausted through the drydock and cleanup area with the maximum unit impact multipliers (UIM) on an hourly and annual basis. There are no proposed increases in hourly or annual emissions from the drydock or changes in the character of emissions; however, modeling was conducted to confirm that the UIM included both day and night-time meteorology.

The dry dock area (EPN DRYDOCK) and paint clean up area (EPN CLEANUP) were modeled as area sources using Screen3 with an emission rate of 1.0 lb/hr for each source to determine site-wide impacts. All emissions were modeled using day and night-time conditions even though the facility only operates during the day. A fugitive adjustment factor of 0.6, a shroud factor of 0.3 (3-sided shrouds), and a low wind speed adjustment factor of 0.67 were applied to the modeling results for EPN DRYDOCK. A fugitive adjustment factor of 0.6 and a low wind speed adjustment factor of 0.67 were applied to the modeling results for EPN CLEANUP. No shroud factor was applied to EPN CLEANUP since no shrouding will be used during cleanup operations.

All of the air contaminants under evaluation met the criteria of Step 1 of the MERA evaluation and no further analysis is required. Given this, no short- or long-term adverse health effects are anticipated to occur among the general public as a result of exposure to the proposed emissions from this facility.

Project Reviewer	Date	Team Leader	Date
Miyah Calhoun		Sabrina Coty-Butler	

N/A

H. Voluntary on-site compliance assessment dates:

N/A

I. Participation in a voluntary pollution reduction program:

N/A

J. Early compliance:

N/A

Sites Outside of Texas:

N/A