



MARINE COATING OPERATIONS

Fee Schedules 27A, B, & C

The BACT Control Options which have been determined to be technologically feasible (T/F - demonstrated but not necessarily proven in field application) or have achieved the BACT emission rate limits in practice (A/P - demonstrated in use for the specific equipment category) are listed below. The BACT Control Options are listed in descending order of control stringency. If the top-listed T/F control option is proposed, no further analysis is required. If the first T/F control option is not chosen, then the applicant must review and determine the cost-effectiveness of each T/F control option in the order listed. The first control option determined to be cost-effective must be installed to meet the BACT requirement. A control option is considered cost-effective if the annualized cost of implementing that control option is equal to or less than the reference cost-effectiveness value for the same pollutant shown in Table 2-4. If none of the T/F control options are determined to be cost-effective, the applicant must propose the A/P control option, propose an alternative technology that meets the BACT emission rate limit or perform a full Top-down BACT Analysis as described in Section 4. The applicant is responsible for ensuring that the installed equipment meets the specified BACT Emission Rate Limit. (See Section 2 for further guidance.)

	VOC	NOx	SOx	PM						
BACT Emission Rate Limit	<p>For operations ≥10 gallons/day and feasible to apply coatings in a paint spray booth: Collection system vented to carbon adsorber or afterburner with coatings complying with Rule 67.18 - Marine Coating Operations (T/F)</p> <p>BACT Emission Rate Limit - emissions controlled to overall capture/ destruction efficiency > 90% by weight.</p>	(N/A)	(N/A)	<p>Spray booth if used, shall be equipped with overspray filters.</p> <p>(A/P)</p>						
BACT Control Option	<p>For operations emitting <140 lbs of VOC emissions/day, and not feasible to apply coatings in a paint spray booth: Compliance with Rule 67.18 - Marine Coating Operations, except for the VOC content of the following coating categories with mil spec requirements:</p> <table border="0"> <tr> <td>Coating Category</td> <td>VOC Limit (g/L)</td> </tr> <tr> <td>High Temperature Coating</td> <td>420</td> </tr> <tr> <td>Low Activation Interior Coating</td> <td>340</td> </tr> </table> <p>(A/P)</p>	Coating Category	VOC Limit (g/L)	High Temperature Coating	420	Low Activation Interior Coating	340			<p>High transfer efficiency application equipment where feasible and shrouding.</p> <p>(A/P)</p>
Coating Category	VOC Limit (g/L)									
High Temperature Coating	420									
Low Activation Interior Coating	340									

<p>The applicant may choose to limit the Potential to Emit (PTE) from the equipment to less than 10 pounds per day for each pollutant in lieu of meeting the stated BACT requirement.</p>

(This table does not apply to operations emitting, on average, 140 or more pounds of VOC per day conducted outside of a paint spray booth.)