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	Processed by	Jason Aspell
	Reviewed by	Hamed Mandilawi
	Date	05/27/08

PERMIT TO OPERATE EVALUATION
Paint Spray Booths (4) (change of conditions)

Applicant's Name: Taylor-Dunn Manufacturing Co.
Company ID No.: 391
Mailing Address: 2114 W. Ball Rd., Anaheim, CA 92804
Equipment Address: 2114 W. Ball Rd., Anaheim, CA 92804

EQUIPMENT DESCRIPTION:

Application 477291:
 Title V Revision

Application 476641 (formerly P/N M41092, A/N 126139) :
 SPRAY BOOTH NO. 1, FLOOR-FILTER TYPE, 12'-0" W. X 12'-0" L. X 7'-0" H., WITH TWENTY-EIGHT 20" X 20" EXHAUST FILTERS AND ONE 5 HP EXHAUST FAN.

Application 476642 (formerly P/N 743964, A/N 13964X):
 SPRAY BOOTH NO. 2, BINKS, FLOOR TYPE, 6'-0" W. X 4'-0" L. X 7'-0" H., WITH TWELVE 20" X 20" EXHAUST FILTERS AND ONE 3 HP EXHAUST FAN.

Application 476643 (formerly P/N 755727, A/N 15727X):
 SPRAY BOOTH NO. 3, AUTOMOTIVE TYPE, BINKS, 18'-0" W. X 33'-0" L X 9'-0" H., WITH EIGHTEEN 20" X 20" EXHAUST FILTERS, AND ONE 5 HP EXHAUST FAN.

Application 476644 (formerly P/N 755728, A/N 15728X):
 SPRAY BOOTH NO. 4, BINKS, AUTOMOTIVE TYPE, 12'-0" W. X 21'-0" L. X 9'-0" H., WITH TWELVE 20" X 20" EXHAUST FILTERS, AND ONE 3 HP EXHAUST FAN.

HISTORY:

The company submitted Application Nos. 476641-44 on 12/26/07 for changes in condition for four spray booths. A/N 477291 was submitted at the same time as a Title V Permit Revision application. The facility is in the Title V permitting program, but is not subject to the RECLAIM program. The facility is located in an industrial/commercial zone, but has adjacent sensitive receptors, which includes nearby schools. The facility has not been the source of any complaints within the last three years. The company received a notice of violation for operating two laser cutters without a permit. The only recent enforcement action for the facility was the previously discussed Notice of Violation which also included a violation for not maintaining HAP emission records. The facility achieved compliance for this notice on 5/8/07.

The solvent recovery still permit (Permit No. F43201) will be removed from the Title V permit since the equipment was removed on 2/28/07. According to PAATS tracking, the permit for the solvent still was inactivated on 4/24/07.

PROCESS DESCRIPTION:

Taylor Dunn manufactures industrial utility vehicles for large companies such as industrial plants and public facilities. At this facility, the company performs metal fabrication, spray painting, vehicle assembly and vehicle maintenance. In addition to the spray booths, the facility is operating two laser cutting systems used in the metal fabrication process. The company operates the spray booths to apply

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coatings to the vehicles. The company uses an HVLP spray gun to apply waterbased coatings to metal substrates. All of the booths have filtration which has 90% collection efficiency. Although the company does not spray any coatings containing hexavalent chromium, there are no prohibitory conditions disallowing the usage of the compound in the permits for the spray booths. For AB2588 (H&SC 44300) purposes, the company is voluntarily requesting to prohibit the usage of materials containing hexavalent chromium in this equipment. The change will not have any effect on any criteria pollutant emissions. The operating schedule for the facility is 52 wk/yr, 5 day/wk, and 8.5 hr/day.

EMISSION CALCULATIONS:

The changes in condition will not affect the emissions from this equipment. The emissions will remain the same as previously calculated.

RULES/REGULATION EVALUATION:

RULE 212, PUBLIC NOTIFICATION

SUBPARAGRAPH 212(c)(1):

The facility is within 1000 feet of several schools. However, this modification will not affect criteria pollutant emissions and will reduce the possible health risk by eliminating potential hexavalent chromium emissions. Therefore pursuant to this section, no public notice will be required.

PARAGRAPH 212(c)(2):

The change in conditions will not cause any increase in criteria pollutant emissions at the facility. Therefore, a 30-day public notice period will not be required under this paragraph.

PARAGRAPH 212(c)(3):

The change of conditions will reduce the possible health risk from the equipment by eliminating any potential hexavalent chromium emissions. Since there will be no increase in toxic emissions, a public notice will not be required under this paragraph.

PARAGRAPH 212(g):

The modified source will not result in an emission increase exceeding the daily maximums for VOC or PM₁₀ emissions as specified in Rule 212(g). Therefore, a 30-day public notice period will not be required under this paragraph.

RULE 401, VISIBLE EMISSIONS

With the proper use of the equipment, no visible emissions are expected.

RULE 1107, COATING OF METAL PARTS AND PRODUCTS

The company is not altering their coating operation and will be using the same Plascon waterbased coatings that have been determined to comply with the requirements of this rule during an inspection in 2007. HVLP spray guns are used to apply to coatings. Compliance with this rule is expected.

RULE 1171, SOLVENT CLEANING OPERATIONS

The company is not altering their coating operation and will be using the same solvents that have been determined to comply with the requirements of this rule during an inspection in 2007.

REGULATION XIII

RULE 1303(a), BEST AVAILABLE CONTROL TECHNOLOGY (BACT)

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There will be no emission increase of any nonattainment air contaminants from the change of conditions. Therefore no new BACT requirements will be triggered. Compliance with this rule is expected.

RULE 1303(b)(1), MODELING

There will be no emission increase of any nonattainment air contaminants from the change of conditions. Therefore, no modeling requirements will apply to this equipment.

RULE 1304(c)(1), OFFSET EXEMPTIONS

There will be no emission increase of any nonattainment air contaminants from the change of conditions. Therefore, no modeling requirements will apply to this equipment.

RULE 1401, NEW SOURCE REVIEW OF TOXIC AIR CONTAMINANTS

The modification will be exempt from this rule under 1401(g)(1)(B), since there will be no increase in MOCR and acute or chronic hazard indices. The removal of hexavalent chromium will lower the potential MOCR of the equipment. Also, the company will be continuing to use the same coatings they are currently using, so the health risk will not be increasing or changing. Compliance with this rule is expected.

REGULATION XXX:

This facility is not in the RECLAIM program. The proposed project is considered as a “minor permit revision” to the Title V permit for this facility.

Rule 3000(b)(12)(vi) defines a “minor permit revision” as any Title V permit revision that does not result in an increase in emissions of a pollutant subject to Regulation XIII – New Source Review (non-RECLAIM pollutants) or a hazardous air pollutant (HAP).

The proposed project is not expected to result in an increase in emissions of a pollutant subject to Regulation XIII – New Source Review (non-RECLAIM pollutants) or a hazardous air pollutant (HAP), and therefore is considered as a “minor permit revision” pursuant to Rule 3000(b)(12)(A)(vi).

This proposed project is the first permit revision to the Title V renewal permit issued to this facility on March 26, 2006. The following table summarizes the permit revisions since the Title V renewal permit was issued :

Revision	HAP	VOC	NO_x	PM₁₀	SO_x	CO
1 st Permit Revision; change of condition for four spray booths	0	0	0	0	0	0
Cumulative Total	0	0	0	0	0	0
Maximum Daily	30	30	40	30	60	220

RECOMMENDATION

The proposed project is expected to comply with all applicable District Rules and Regulations. Since the proposed project is considered as a “minor permit revision”, it is exempt from the public participation

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requirements under Rule 3006(b). A proposed permit incorporating this permit revision will be submitted to EPA for a 45-day review pursuant to Rule 3003(j). If EPA does not have any objections within the review period, a revised Title V permit will be issued to this facility.

PERMIT CONDITIONS

A/N 476641

Conditions:

1. THIS SPRAY BOOTH SHALL NOT BE OPERATED UNLESS ALL EXHAUST AIR PASSES THROUGH FILTER MEDIA AT LEAST 1 INCH THICK.
[RULE 1303(a)(1)-BACT]
2. ORGANIC SOLVENTS AND/OR COATINGS CONTAINING ORGANIC SOLVENTS USED IN THIS EQUIPMENT WHICH ARE NOT SUBJECT TO RULE 1107 SHALL BE CLEARLY LABELED AS NON-PHOTOCHEMICALLY REACTIVE BY THE SUPPLIER OR, FOR BULK SHIPMENTS, SHOWN TO BE NON-PHOTOCHEMICALLY REACTIVE ON BILLS OF LADING OR INVOICES.
[RULE 443]
3. COATINGS, SOLVENTS AND OTHER MATERIALS CONTAINING HEXAVALENT CHROMIUM SHALL NOT BE APPLIED IN THIS EQUIPMENT.
[H&SC 44300]

Periodic Monitoring:

4. THE OPERATOR SHALL PERFORM A WEEKLY INSPECTION OF THE EQUIPMENT AND FILTER MEDIA FOR LEAKS, BROKEN OR TORN FILTER MEDIA AND IMPROPERLY INSTALLED FILTER MEDIA. THE OPERATOR SHALL KEEP RECORDS, IN A MANNER APPROVED BY THE DISTRICT, FOR THE FOLLOWING PARAMETER(S) OR ITEM(S):
 - A. THE NAME OF THE PERSON PERFORMING THE INSPECTION AND/OR MAINTENANCE OF THE FILTER MEDIA;
 - B. THE DATE, TIME AND RESULTS OF THE INSPECTION; AND
 - C. THE DATE, TIME AND DESCRIPTION OF ANY MAINTENANCE OR REPAIRS RESULTING FROM THE INSPECTION.
 [RULE 3004(a)(4)]
5. THE OPERATOR SHALL USE THIS EQUIPMENT IN SUCH A MANNER THAT THE DIFFERENTIAL PRESSURE ACROSS THE FILTER DOES NOT EXCEED 0.25 INCHES WATER COLUMN. TO COMPLY WITH THIS CONDITION THE OPERATOR SHALL INSTALL AND MAINTAIN A PRESSURE GAUGE TO ACCURATELY INDICATE THE DIFFERENTIAL PRESSURE ACROSS THE FILTER. THE OPERATOR SHALL DETERMINE AND RECORD THE PARAMETER BEING MONITORED ONCE EVERY 7 DAYS.
[RULE 3004(a)(4)]

Emissions and Requirements:

6. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS:
 - PM: RULE 404, SEE APPENDIX B FOR EMISSION LIMITS
 - PM: RULE 481
 - VOC: RULE 1107, SEE APPENDIX B FOR EMISSION LIMITS
 - VOC: RULE 1171, SEE APPENDIX B FOR EMISSION LIMITS

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VOC: RULE 109

A/N 476642

Conditions:

1. THIS PERMIT DOES NOT AUTHORIZE THE EMISSION OF AIR CONTAMINANTS IN EXCESS OF THOSE ALLOWED BY DIVISION 20, CHAPTER 2, ARTICLE 3, OF THE HEALTH AND SAFETY CODES OF THE STATE OF CALIFORNIA OR THE RULES AND REGULATIONS OF THE AIR POLLUTION CONTROL DISTRICT.
[RULE 204]
2. COATINGS, SOLVENTS AND OTHER MATERIALS CONTAINING HEXAVALENT CHROMIUM SHALL NOT BE APPLIED IN THIS EQUIPMENT.
[H&SC 44300]

Periodic Monitoring:

3. THE OPERATOR SHALL PERFORM A WEEKLY INSPECTION OF THE EQUIPMENT AND FILTER MEDIA FOR LEAKS, BROKEN OR TORN FILTER MEDIA AND IMPROPERLY INSTALLED FILTER MEDIA. THE OPERATOR SHALL KEEP RECORDS, IN A MANNER APPROVED BY THE DISTRICT, FOR THE FOLLOWING PARAMETER(S) OR ITEM(S):
 - A. THE NAME OF THE PERSON PERFORMING THE INSPECTION AND/OR MAINTENANCE OF THE FILTER MEDIA;
 - B. THE DATE, TIME AND RESULTS OF THE INSPECTION; AND
 - C. THE DATE, TIME AND DESCRIPTION OF ANY MAINTENANCE OR REPAIRS RESULTING FROM THE INSPECTION.
 [RULE 3004(a)(4)]
4. THE OPERATOR SHALL USE THIS EQUIPMENT IN SUCH A MANNER THAT THE DIFFERENTIAL PRESSURE ACROSS THE FILTER DOES NOT EXCEED 0.25 INCHES WATER COLUMN. TO COMPLY WITH THIS CONDITION THE OPERATOR SHALL INSTALL AND MAINTAIN A PRESSURE GAUGE TO ACCURATELY INDICATE THE DIFFERENTIAL PRESSURE ACROSS THE FILTER. THE OPERATOR SHALL DETERMINE AND RECORD THE PARAMETER BEING MONITORED ONCE EVERY 7 DAYS.
[RULE 3004(a)(4)]
5. THE OPERATOR SHALL NOT USE THIS EQUIPMENT UNLESS ALL EXHAUST AIR PASSES THROUGH FILTER MEDIA AT LEAST TWO INCHES THICK.
[RULE 3004(a)(4)]

Emissions and Requirements:

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A/N 476643

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Conditions:

1. THIS PERMIT DOES NOT AUTHORIZE THE EMISSION OF AIR CONTAMINANTS IN EXCESS OF THOSE ALLOWED BY DIVISION 26 OF THE HEALTH AND SAFETY CODE OF THE STATE OF CALIFORNIA OR THE RULES OF THE AIR QUALITY MANAGEMENT DISTRICT. THIS PERMIT CANNOT BE CONSIDERED AS PERMISSION TO VIOLATE EXISTING LAWS, ORDINANCES, REGULATIONS OR STATUTES OF OTHER GOVERNMENT AGENCIES.
[RULE 204]
2. COATINGS, SOLVENTS AND OTHER MATERIALS CONTAINING HEXAVALENT CHROMIUM SHALL NOT BE APPLIED IN THIS EQUIPMENT.
[H&SC 44300]

Periodic Monitoring:

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A/N 476644

Conditions:

1. THIS PERMIT DOES NOT AUTHORIZE THE EMISSION OF AIR CONTAMINANTS IN EXCESS OF THOSE ALLOWED BY DIVISION 26 OF THE HEALTH AND SAFETY CODE OF THE STATE OF

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[RULE 204]

- 2. COATINGS, SOLVENTS AND OTHER MATERIALS CONTAINING HEXAVALENT CHROMIUM SHALL NOT BE APPLIED IN THIS EQUIPMENT.
[H&SC 44300]

Periodic Monitoring:

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