

NOV 14 2012

Oscar Rodriguez  
Prison Industry Authority - Avenal  
P O Box 8  
Avenal, CA 93204

**Re: Notice of Preliminary Decision - Title V Permit Renewal  
District Facility # C-954  
Project # C-1112040**

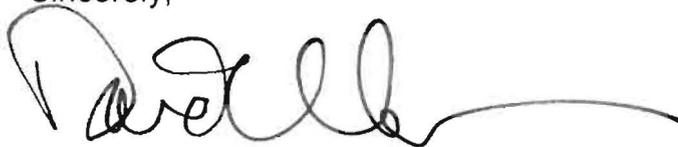
Dear Mr. Rodriguez:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Prison Industry Authority - Avenal for its correctional facility at 1 Kings Way in Avenal, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 30-day comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,



David Warner  
Director of Permit Services

**Attachments**

C: Vanesa Gonzalez, Permit Services Engineer

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

---

**Northern Region**  
4800 Enterprise Way  
Modesto, CA 95356-8718  
Tel: (209) 557-6400 FAX: (209) 557-6475

**Central Region (Main Office)**  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
Tel: (559) 230-6000 FAX: (559) 230-6061

**Southern Region**  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
Tel: 661-392-5500 FAX: 661-392-5585



NOV 14 2012

Gerardo C. Rios, Chief  
Permits Office (AIR-3)  
U.S. EPA - Region IX  
75 Hawthorne St.  
San Francisco, CA 94105

**Re: Notice of Preliminary Decision – Title V Permit Renewal  
District Facility # C-954  
Project # C-1112040**

Dear Mr. Rios:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Prison Industry Authority - Avenal for its correctional facility at 1 Kings Way in Avenal, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 45-day comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,

David Warner  
Director of Permit Services

**Attachments**

C: Vanesa Gonzalez, Permit Services Engineer

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NOV 14 2012

Mike Tollstrup, Chief  
Project Assessment Branch  
Air Resources Board  
P O Box 2815  
Sacramento, CA 95812-2815

**Re: Notice of Preliminary Decision - Title V Permit Renewal  
District Facility # C-954  
Project # C-1112040**

Dear Mr. Tollstrup:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Prison Industry Authority - Avenal for its correctional facility at 1 Kings Way in Avenal, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 30-day comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,



David Warner  
Director of Permit Services

Attachments  
C: Vanesa Gonzalez, Permit Services Engineer

Seyed Sadredin  
Executive Director/Air Pollution Control Officer

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Hanford Sentinel

**NOTICE OF PRELIMINARY DECISION  
FOR THE PROPOSED RENEWAL OF  
THE FEDERALLY MANDATED OPERATING PERMIT**

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District solicits public comment on the proposed renewal of the Federally Mandated Operating Permit to Prison Industry Authority - Avenal for its correctional facility at 1 Kings Way in Avenal, California.

The District's analysis of the legal and factual basis for this proposed action, project #C-1112040, is available for public inspection at [http://www.valleyair.org/notices/public\\_notices\\_idx.htm](http://www.valleyair.org/notices/public_notices_idx.htm) and the District office at the address below. There are no emission changes associated with this proposed action. This will be the public's only opportunity to comment on the specific conditions of the proposed renewal of the Federally Mandated Operating permit. If requested by the public, the District will hold a public hearing regarding issuance of this renewed permit. For additional information, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900. Written comments on the proposed renewed permit must be submitted within 30 days of the publication date of this notice to DAVID WARNER, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 1990 E. GETTYSBURG AVE, FRESNO, CALIFORNIA 93726-0244.

# SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT

Proposed Title V Permit Renewal Evaluation  
Prison Industry Authority - Avenal  
C-954

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**TITLE V PERMIT RENEWAL EVALUATION**  
**Correctional Institution**

**Engineer:** Vanesa Gonzalez

**Date:** October 9, 2012

**Facility Number:** C-954

**Facility Name:** Prison Industry Authority – Avenal

**Mailing Address:** P.O. Box 8  
Avenal, CA 93204

**Contact Name:** Oscar Rodriguez

**Phone:** (559) 867-7401

**Responsible Official:** Oscar Rodriguez

**Title:** Prison Industries Administrator

**Project # :** C-1112040

**Deemed Complete:** July 12, 2011

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**I. PROPOSAL**

Prison Industry Authority - Avenal was issued a Title V permit on April 1, 2007. As required by District Rule 2520, the applicant is requesting a permit renewal. The existing Title V permit shall be reviewed and modified to reflect all applicable District and federal rules updated, removed, or added since the issuance of the initial Title V permit.

The purpose of this evaluation is to provide the legal and factual basis for all updated applicable requirements and to determine if the facility will comply with these updated requirements. It also specifically identifies all additions, deletions, and/or changes made to permit conditions or equipment descriptions.

**II. FACILITY LOCATION**

Prison Industry Authority - Avenal is located at 1 Kings Way in Avenal, Ca.

**III. EQUIPMENT LISTING**

A detailed facility printout listing all permitted equipment at the facility is included as Attachment C.

#### **IV. GENERAL PERMIT TEMPLATE USAGE**

The applicant is requesting to use the following model general permit Templates:

##### **A. Template SJV-UM-0-3 Facility Wide Umbrella**

The applicant has requested to utilize template No. SJV-UM-0-3, Facility Wide Umbrella. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

#### **V. SCOPE OF EPA AND PUBLIC REVIEW**

Certain segments of the proposed Renewed Operating Permit are based on model general permit templates that have been previously subject to EPA and public review. The terms and conditions from the model general permit templates are included in the proposed permit and are not subject to further EPA and public review.

For permit applications utilizing model general permit templates, public and agency comments on the District's proposed actions are limited to the applicant's eligibility for model general permit template, applicable requirements not covered by the model general permit template, and the applicable procedural requirements for issuance of Title V Operating Permits.

The following permit conditions, including their underlying applicable requirements, originate from model general permit templates and are not subject to further EPA or public review.

Conditions 2 through 42 of the requirements for permit unit C-954-0-2.

#### **VI. FEDERALLY ENFORCEABLE REQUIREMENTS**

##### **A. Rules Updated**

- District Rule 2020, Exemptions (amended December 19, 2002 ⇒ amended August 18, 2011)<sup>1</sup>
- District Rule 4603, Surface Coating of Metal Parts and Products, Plastic Parts and Products, and Pleasure Crafts (amended May 18, 2006 ⇒ amended September 17, 2009)
- District Rule 4606, Wood Products and Flat Wood Paneling Products Coating Operations (amended December 20, 2001 ⇒ October 16, 2008)

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<sup>1</sup> The amendments made to this rule on August 18, 2011 have no impact to this source; therefore template SJV-UM-0-3 is still valid for this project.

- District Rule 4702, Internal Combustion Engines (amended June 16, 2005 ⇒ amended August 8, 2011)

#### **B. Rules Removed**

- District Rule 4701, Internal Combustion Engines – Phase 1 (amended August 21, 2003)

#### **C. Rules Added**

- 40 CFR Part 63 Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutant for Stationary Reciprocating Internal Combustion Engines

#### **D. Rules Not Updated**

- District Rule 1070, Inspections (December 17, 1992)
- District Rule 2520, Federally Mandated Operating Permits (June 21, 2001)
- District Rule 4201, Particulate Matter Concentration (amended December 17, 1992)
- District Rule 4801, Sulfur Compounds (amended December 17, 1992)

### **VII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE**

For each Title V source, the District issues a single permit that contains the Federally Enforceable requirements, as well as the District-only requirements. The District-only requirements are not a part of the Title V Operating Permits. The terms and conditions that are part of the facility's Title V permit are designated as "Federally Enforceable Through Title V Permit".

For this facility, the following are not federally enforceable and will not be discussed in further detail:

#### **A. Rules Added**

No rules were added to the permit that are not federal enforceable.

#### **B. Rules Not Updated**

- District Rule 4102, Nuisance (amended December 17, 1992)

For this facility, condition 1 of the requirements for permit unit C-954-0-2 are based on the rules listed above and are not Federally Enforceable through Title V.

- Title 17 CCR, Section 93115, Airborne Toxic Control Measure for Stationary Compression Ignition (CI) Engines

For this facility, conditions 4, 5, 7, 8, 13, 14 and 15 of the requirements for permit unit C-954-12-2 are based on the rules listed above and are not Federally Enforceable through Title V. However, these conditions also show compliance with several SIP Approved District Rules as discussed below. Therefore, these conditions are listed as Federally Enforceable on the permit requirements.

## VIII. PERMIT REQUIREMENTS

The purpose of this evaluation is to review changes to federally enforceable requirements; therefore, this compliance section will only address rules that have been amended or added since the issuance of the initial Title V permit.

### A. District Rule 2020 – Exemptions

District Rule 2020 lists equipment which are specifically exempt from obtaining permits, and specifies recordkeeping requirements to verify such exemptions. The rule was amended on August 18, 2011. The amendments to this rule do not have any effect on current permit requirements and will therefore not be addressed in this evaluation.

Condition 4 of permit -0-2 ensures compliance

### B. District Rule 2201 - New and Modified Stationary Source Review Rule

District Rule 2201 has been amended since this facility's initial Title V permit was issued. This Title V permit renewal does not constitute a modification per section 3.26, defined as an action including at least one of the following items:

- 1) Any change in hours of operation, production rate, or method of operation of an existing emissions unit, which would necessitate a change in permit conditions.
- 2) Any structural change or addition to an existing emissions unit which would necessitate a change in permit conditions. Routine replacement shall not be considered to be a structural change.
- 3) An increase in emissions from an emissions unit caused by a modification of the Stationary Source when the emissions unit is not subject to a daily emissions limitation.
- 4) Addition of any new emissions unit which is subject to District permitting requirements.
- 5) A change in a permit term or condition proposed by an applicant to obtain an exemption from an applicable requirement to which the source would otherwise be subject.

Therefore, the updated requirements of this rule are not applicable at this time.

**C. District Rule 2520 – Federally Mandated Operating Permits**

There are no federally applicable Greenhouse Gas (GHG) requirements for this source. It should be noted that the Mandatory Greenhouse Gas Reporting rule (40CFR Part 98) is not included in the definition of an applicable requirement within Title V (per 40CFR 71.2). Therefore, there will be no further discussion of GHG in this evaluation.

**D. District Rule 4603, Surface Coating of Metal Parts and Products, Plastic Parts and Products, and Pleasure Crafts**

The purpose of this rule is to limit the emissions of volatile organic compounds (VOC) from the coating of metal parts and products, large appliances parts or products, metal furniture, plastic parts and products, automotive/transportation and business machine plastic parts and products, and pleasure crafts, and from the organic solvent cleaning and storage and disposal of solvents and waste solvent materials associated with such coating. This rule also specifies the administrative and recordkeeping requirements and the test methods for determining the VOC content, the VOC emissions, the VOC capture efficiency, the acid content, the metallic or iridescent quality of coatings, and the VOC emissions from spray gun cleaning systems.

The facility has two powder coating operations. These operations use powder coating with no VOCs. Therefore, this rule is not applicable to the operation.

- a. C-954-4-7: POWDER COATING OPERATION CONSISTING OF POWDER COATING BOOTH, 1.8 MMBTU/HR DRY-OFF OVEN, 3.3 MMBTU/HR BAKE OVEN AND 0.34 MMBTU/HR CONTROLLED PYROLYSIS FURNACE WITH INTEGRAL AFTERBURNER FOR PARTS HANGER CLEANING

Condition 9 of the permit requirements will ensure this unit remains exempt from District Rule 4603.

- b. C-854-10-3: POWDER COATING OPERATION WITH ELECTROSTATIC APPLICATION EQUIPMENT, BOOTH WITH DRY FILTERS AND 0.75 MMBTU/HR NATURAL GAS-FIRED BATCH CURING OVEN

Condition 7 of the permit requirements will ensure this unit remains exempt from District Rule 4603.

**E. District Rule 4606, Wood Products and Flat Wood Paneling Products Coating Operations**

The purpose of this rule is to limit the emissions of volatile organic compounds (VOCs) from wood products coating operations, and from the organic solvent cleaning, and the storage and disposal of solvents and waste solvent materials

associated with such coating operations. The rule also provides the administrative requirements for recording and measuring emissions.

The provisions of this rule shall apply to the application of coatings to wood products, including furniture, cabinets, flat wood paneling, and custom replica furniture. The rule shall also apply to the organic solvent cleaning, and the storage and disposal of all solvents and waste solvent materials associated with such coating operations.

Section 5.1 applies to wood products coating operation. An operator shall not apply any coating to a wood product, as defined in Section 3.0, which has a VOC content, as applied, that exceeds the applicable limit specified in Tables 1 or 2:

Table 1 VOC Content Limits for Wood Product Coating Operation		
Coating Category	grams of VOC/liter of coating, excluding water and exempt compounds, as applied	pounds of VOC/gallon of coating, excluding water and exempt compounds, as applied
Clear Coat	275	2.3
Filler	275	2.3
High Solids Stain	240	2.0
Ink	500	4.2
Mold-Seal Coating	750	6.3
Multi-Colored Coating	275	2.3
Pigmented Coating	275	2.3
Sanding Sealer	275	2.3

Table 2 VOC Content Limits for Wood Product Coating Operation		
Coating Category	Grams of VOC/liter of material, as applied	Pounds of VOC/gallon of material, as applied
Low-Solids Stain	120	1.0
Stripper	350	2.9

Section 5.2 an operator may operate an APCO-approved VOC emission control system that controls the emissions from the source operation and that meets the requirements of Section 5.4, in lieu of complying with the requirements in Section 5.1. The facility is complying with the requirements of Table 1 and 2. Therefore, this section is not applicable.

Section 5.3 applies to flat wood paneling products coating operations. Since this facility does not coat flat wood paneling, this section is not applicable and will not be discussed any further.

Section 5.4 contains the requirements for a VOC Emission Control System installed to comply with this rule in lieu of complying with applicable provisions of Sections 5.1, 5.3, 5.5, or 5.7. As previously discussed the facility is meeting the requirements in Section 5.1. Therefore, this section is not applicable and will not be discussed any further.

- a. C-945-1-4: WOOD PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN, BINKS MODEL PFF-16-10-T-LH SPRAY PAINT BOOTH WITH EXHAUST FILTERS, AND VERID GUNWASHER MODEL 200-1 (COMMON WITH C-954-2)

Conditions 5 through 7 of the permit requirements ensure compliance with these sections.

- b. C-945-2-6: WOOD PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN, BINKS MODEL PFF-16-10-T-LH SPRAY PAINT BOOTH WITH EXHAUST FILTERS AND VERID GUNWASHER MODEL 200-1 (COMMON WITH C-954-1) AND LOCATED IN BLDG #290, FURNITURE FACTORY

Conditions 5 through 7 of the permit requirements ensure compliance with these sections.

- c. C-945-14-2: CHAIR MANUFACTURING AND FINISHING BUILDING #290 WITH A NEW CONVEYORIZED UV COATING LINE CONSISTING OF AN INCLINED UV CURING SYSTEM, A BELT CONVEYOR, A ROTARY SANDING/DENIBBING MACHINE, A RECIPROCATING SPRAY MACHINE, A PANEL BRUSHING MACHINE, A BELT CONVEYOR FOR HAND SANDING, A BELT CONVEYOR FOR HAND WIPING, AND A MULTI-LEVEL FLASH-OFF OVEN SYSTEM (ELECTRIC OVEN) EXHAUSTED THROUGH DANThERM MODEL CS-3-M BAGHOUSE INCLUDING A 40 HP BLOWER AND FILTRATION UNIT

Conditions 7 through 9 of the permit requirements ensure compliance with these sections.

Per Section 5.5 an operator shall not apply coatings to wood products subject to the provisions of this rule unless the coating is applied with properly operating equipment, according to proper operating procedures, and by the use of one of the following methods:

- Electrostatic application;
- High-Volume, Low-Pressure (HVLP) spray,

- High-Volume, Low-Pressure (HVLP) spray equipment shall be operated in accordance with the manufacturer's recommendations.
  - For HVLP spray guns manufactured prior to January 1, 1996, the end user shall demonstrate that the gun meets HVLP spray equipment standards. Satisfactory proof will be either in the form of manufacturer's published technical material or by a demonstration using a certified air pressure tip gauge, measuring the air atomizing pressure dynamically at the center of the air cap and at the air horns.
  - A person shall not sell or offer for sale for use within the District any HVLP spray gun without a permanent marking denoting the maximum inlet air pressure in psig at which the gun will operate within the parameters specified in Section 3.0.
- Hand roller;
  - Flow coat;
  - Roll coater;
  - Dip coat;
  - Paint brush;
  - Detailing or touch-up guns; or
  - Such other coating application methods which are demonstrated to the APCO to be capable of achieving at least 65 percent transfer efficiency as determined in accordance with Section 6.6. Prior written approval from the APCO shall be obtained for each alternative method used.
  - lieu of complying with the requirements in Sections 5.5.1 through 5.5.9, an operator may control emissions from application equipment with an APCO-approved VOC emission control system that meets the applicable requirements of Section 5.4.

- a. C-945-1-4: WOOD PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN, BINKS MODEL PFF-16-10-T-LH SPRAY PAINT BOOTH WITH EXHAUST FILTERS, AND VERID GUNWASHER MODEL 200-1 (COMMON WITH C-954-2)

Conditions 8 and 9 of the permit requirements ensure compliance with these sections.

- b. C-945-2-6: WOOD PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN, BINKS MODEL PFF-16-10-T-LH SPRAY PAINT BOOTH WITH EXHAUST FILTERS AND VERID GUNWASHER MODEL 200-1 (COMMON WITH C-954-1) AND LOCATED IN BLDG #290, FURNITURE FACTORY

Conditions 8 and 9 of the permit requirements ensure compliance with these sections.

- c. C-945-14-2: CHAIR MANUFACTURING AND FINISHING BUILDING #290 WITH A NEW CONVEYORIZED UV COATING LINE CONSISTING OF AN INCLINED UV CURING SYSTEM, A BELT CONVEYOR, A ROTARY SANDING/DENIBBING MACHINE, A RECIPROCATING SPRAY MACHINE, A PANEL BRUSHING MACHINE, A BELT CONVEYOR FOR HAND SANDING, A BELT CONVEYOR FOR HAND WIPING, AND A MULTI-LEVEL FLASH-OFF OVEN SYSTEM (ELECTRIC OVEN) EXHAUSTED THROUGH DANTHERM MODEL CS-3-M BAGHOUSE INCLUDING A 40 HP BLOWER AND FILTRATION UNIT

Conditions 10 and 11 of the permit requirements ensure compliance with these sections.

Section 5.6 applies to flat wood paneling products coating operations. This facility does not have any flat wood paneling products coating operations. Therefore, this section does not apply and will not be discussed any further.

Section 5.7 lists the requirements for organic solvents.

- An operator shall not use organic solvents for cleaning operations that exceed the content limits specified in Table 4 in accordance with the corresponding effective date.
- An operator shall not use a strippable booth coating with a VOC content in excess of 450 g/l (3.8 lb/gal) as applied, excluding water and exempt compounds.

Table 4 – VOC Limits for Organic Solvents Used in Cleaning Operations	
Type of Solvent Cleaning Operation	VOC Content Limit Grams of VOC/liter of material (lb/gal)
A. Product Cleaning During Manufacturing Process or Surface Preparation for Coating Application	25 (0.21)
B. Repair and Maintenance Cleaning	25 (0.21)
C. Cleaning of Coating Application Equipment	25 (0.21)

Per Section 5.7.3, in lieu of complying with the VOC content limits of Table 4, an operator may control emissions from cleaning operations with an APCO-approved VOC emission control system that meets the applicable requirements of Section 5.4. The facility will not use organic solvents that do not meet the requirements of Table 4. Therefore this section is not applicable.

Section 5.7.4 was applicable until September 20, 2008, an operator performing Table 4 Category C cleaning outside of an APCO-approved VOC emission control system and using solvent with VOC content greater than 50 g/L shall meet the

requirements of Sections 5.7.5 through 5.7.7 in addition to meeting the VOC content limits of Table 4 Category C. On and after September 21, 2008, an operator shall perform all solvent cleaning operations with cleaning material having VOC content of 25 g/L or less, unless such cleaning operations are carried out within the control of an APCO-approved emission control system that meets the requirements of Section 5.4. Sections 5.7.5 through 5.7.7 shall not apply on and after September 21, 2008.

Per Section 5.8 an operator shall store or dispose of fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty.

- a. C-945-1-4: WOOD PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN, BINKS MODEL PFF-16-10-T-LH SPRAY PAINT BOOTH WITH EXHAUST FILTERS, AND VERID GUNWASHER MODEL 200-1 (COMMON WITH C-954-2)

Conditions 10 and 13 of the permit requirements ensure compliance with these sections.

- b. C-945-2-6: WOOD PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN, BINKS MODEL PFF-16-10-T-LH SPRAY PAINT BOOTH WITH EXHAUST FILTERS AND VERID GUNWASHER MODEL 200-1 (COMMON WITH C-954-1) AND LOCATED IN BLDG #290, FURNITURE FACTORY

Conditions 10 and 13 of the permit requirements ensure compliance with these sections.

- c. C-945-14-2: CHAIR MANUFACTURING AND FINISHING BUILDING #290 WITH A NEW CONVEYORIZED UV COATING LINE CONSISTING OF AN INCLINED UV CURING SYSTEM, A BELT CONVEYOR, A ROTARY SANDING/DENIBBING MACHINE, A RECIPROCATING SPRAY MACHINE, A PANEL BRUSHING MACHINE, A BELT CONVEYOR FOR HAND SANDING, A BELT CONVEYOR FOR HAND WIPING, AND A MULTI-LEVEL FLASH-OFF OVEN SYSTEM (ELECTRIC OVEN) EXHAUSTED THROUGH DANTherm MODEL CS-3-M BAGHOUSE INCLUDING A 40 HP BLOWER AND FILTRATION UNIT

Conditions 12 and 15 of the permit requirements ensure compliance with these sections.

Section 6.0 contains the administrative requirements for this rule. The requirements include coating and solvent cleaning recordkeeping. This section also requires the operator to retain the records specified in this rule, as applicable, on site for a period

of five years, make them available on site during normal business hours to the APCO, ARB, or EPA, and submit them to the APCO, ARB, or EPA upon request.

- a. C-945-1-4: WOOD PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN, BINKS MODEL PFF-16-10-T-LH SPRAY PAINT BOOTH WITH EXHAUST FILTERS, AND VERID GUNWASHER MODEL 200-1 (COMMON WITH C-954-2)

Conditions 15 and 17 of the permit requirements ensure compliance with this section.

- b. C-945-2-6: WOOD PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN, BINKS MODEL PFF-16-10-T-LH SPRAY PAINT BOOTH WITH EXHAUST FILTERS AND VERID GUNWASHER MODEL 200-1 (COMMON WITH C-954-1) AND LOCATED IN BLDG #290, FURNITURE FACTORY

Conditions 15 and 17 of the permit requirements ensure compliance with this section.

- c. C-945-14-2: CHAIR MANUFACTURING AND FINISHING BUILDING #290 WITH A NEW CONVEYORIZED UV COATING LINE CONSISTING OF AN INCLINED UV CURING SYSTEM, A BELT CONVEYOR, A ROTARY SANDING/DENIBBING MACHINE, A RECIPROCATING SPRAY MACHINE, A PANEL BRUSHING MACHINE, A BELT CONVEYOR FOR HAND SANDING, A BELT CONVEYOR FOR HAND WIPING, AND A MULTI-LEVEL FLASH-OFF OVEN SYSTEM (ELECTRIC OVEN) EXHAUSTED THROUGH DANThERM MODEL CS-3-M BAGHOUSE INCLUDING A 40 HP BLOWER AND FILTRATION UNIT

Conditions 17 through 21 of the permit requirements ensure compliance with this section.

#### **F. District Rule 4702, Internal Combustion Engines–Phase 2**

The purpose of this rule is to limit the emissions of nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), and volatile organic compounds (VOC) from internal combustion engines. This rule applies to any internal combustion (IC) engine with a rated brake horsepower greater than 50 horsepower.

Pursuant to Section 4.3, except for the requirements of Section 6.2.3, the requirements of this rule shall not apply to an internal combustion engine that meets the following conditions:

- 1) The engine is operated exclusively to preserve or protect property, human life, or public health during a disaster or state of emergency, such as a fire or flood, and

- 2) Except for operations associated with Section 4.3.1.1, the engine is limited to operate no more than 100 hours per calendar year as determined by an operational nonresettable elapsed operating time meter, for periodic maintenance, periodic readiness testing, and readiness testing during and after repair work of the engine, and
- 3) The engine is operated with a nonresettable elapsed operating time meter. In lieu of installing a nonresettable time meter, the owner of an engine may use an alternative device, method, or technique, in determining operating time provided that the alternative is approved by the APCO. The owner of the engine shall properly maintain and operate the time meter or alternative device in accordance with the manufacturer's instructions.

Section 6.2.3 requires that an owner claiming an exemption under Section 4.2 or Section 4.3 shall maintain annual operating records. This information shall be retained for at least five years, shall be readily available, and submitted to the APCO upon request and at the end of each calendar year in a manner and form approved by the APCO.

- a. C-954-12-2: 1,250 HP CATERPILLAR MODEL 3412 STA DIESEL-FIRED EMERGENCY IC ENGINE POWERING A 800 KW ELECTRICAL GENERATOR.

Conditions 4, 8 through 15 of the permit requirements for this unit ensure compliance with this rule.

**G. 40 CFR Part 60, Subpart III, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines**

This subpart applies to owners and operators of stationary compression ignition (CI) internal combustion engines (ICE) that commences construction, modify, or reconstruct their stationary CI ICE after July 11, 2005. Permit unit C-954-12-2 was installed prior to July 11, 2005 and is not subject to this subpart.

**H. 40 CFR Part 63 Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutant for Stationary Reciprocating Internal Combustion Engines**

Subpart ZZZZ establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations and operating limitations.

§6585(b) states, "A major source of HAP emissions is a plant site that emits or has the potential to emit any single HAP at a rate of 10 tons (9.07 megagrams) or more per year or any combination of HAP at a rate of 25 tons (22.68 megagrams) or more per year, except that for oil and gas production facilities, a major source of HAP emissions is determined for each surface site."

§6585(c) states, “An area source of HAP emissions is a source that is not a major source.”

The facility is not a major source for HAPs as defined in §6585(b). Therefore, this facility is an area source of HAP emissions.

§6590(a) states, “An affected source is any existing, new, or reconstructed stationary RICE located at a major or area source of HAP emissions, excluding stationary RICE being tested at a stationary RICE test cell/stand.”

§6590(a)(1) defines the criteria for an existing stationary RICE as follows:

- (i) For stationary RICE with a site rating of more than 500 brake horsepower (HP) located at a major source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before December 19, 2002.
- (ii) For stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before June 12, 2006.
- (iii) For stationary RICE located at an area source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before June 12, 2006.
- (iv) A change in ownership of an existing stationary RICE does not make that stationary RICE a new or reconstructed stationary RICE.

Based on the permitting modification records at the District, the engine at this facility did not commence construction or reconstruction on or after June 12, 2006. Therefore, the engine at this facility meets the definition of an existing stationary RICE as defined in §6590(a)(1)(iii) and is subject to the management practice requirements of this subpart.

Permit unit C-954-12 is a diesel-fired emergency IC engine; Subpart ZZZZ management practice requirements apply to this engine. Prison Industry Authority - Avenal is not required to submit an ATC application to update permit unit '-12; the permit will be administratively updated through this Title V project. The following conditions will be placed on the permit to ensure compliance with Subpart ZZZZ:

- On and after October 19, 2013, the engine shall be in full compliance with 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). [40 CFR 63, ZZZZ] - §63.6585/63.6595 (a)
- On and after October 19, 2013, the permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period

needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR 63, ZZZZ] - §63.6625(h)

- On and after October 19, 2013, the engine's oil and filter shall be changed every 4,320 hours of operation or every 12 months, whichever comes first. [40 CFR 63, ZZZZ] - §63.6603/66.6640 Table 2d, Row 6.a
- On and after October 19, 2013, the engine's spark plugs shall be inspected every 4,320 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63, ZZZZ] - §63.6603/66.6640 Table 2d, Row 6.b
- On and after October 19, 2013, the engine's hoses and belts shall be inspected every 4,320 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63, ZZZZ] - §63.6603/66.6640 Table 2d, Row 6.c
- On and after October 19, 2013, the permittee shall maintain monthly records that include any information necessary to demonstrate compliance with 40 CFR 63, ZZZZ. [District Rule 1070 and 40 CFR 63, ZZZZ] - §63.6655
- On and after October 19, 2013, the permittee shall maintain monthly records of all performance tests, opacity and visible emissions observations and required maintenance performed on the air pollution control and monitoring equipment. [District Rule 1070 and 40 CFR 63, ZZZZ] - §63.6655(a)(3)/§63.10(b)(2)(viii) and §63.6655(a)(4)
- On and after October 19, 2013, the permittee shall maintain monthly records of the occurrence and duration of each malfunction of the operation (i.e., process equipment) or the air pollution control and monitoring equipment. The permittee shall also maintain monthly records of the action(s) taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning operation and air pollution control and monitoring equipment to its normal or usual manner of operation. [District Rule 1070 and 40 CFR 63, ZZZZ] - §63.6655(a)(2) and (a)(5)
- All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 4702 and 40 CFR 63, ZZZZ] - §63.6660

**I. 40 CFR Part 64-CAM**

40 CFR Part 64 requires Compliance Assurance Monitoring (CAM) for units that meet the following three criteria:

- 1) the unit must have an emission limit for the pollutant;

- 2) the unit must have add-on controls for the pollutant; these are devices such as flue gas recirculation (FGR), baghouses, and catalytic oxidizers; and
- 3) the unit must have a pre-control potential to emit of greater than the major source thresholds.

a. C-954-1-6: WOOD PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN, BINKS MODEL PFF-16-10-T-LH SPRAY PAINT BOOTH WITH EXHAUST FILTERS, AND VERID GUNWASHER MODEL 200-1 (COMMON WITH C-954-2)

This unit contains an emission limit for VOC and PM<sub>10</sub>. However this unit is not equipped with an add-on control for VOC. Therefore, CAM is not triggered for VOC emissions. This unit is equipped with an add-on control for PM<sub>10</sub> in the form of a paint booth with exhaust filters. However, as shown below, the pre-control potential to emit is not greater than the major source threshold of 140,000 pounds PM<sub>10</sub>/year. Therefore, this permit unit is not subject to CAM.

The PM<sub>10</sub> emission limit for units C-954-1, -2, and -14 is 9.1 lb-PM<sub>10</sub>/week. For worst case scenario it is assumed this unit will emit 9.1 lb-PM<sub>10</sub>/week for 52 weeks per year. The paint booth with exhaust filters has a control efficiency of 99%.

$$\begin{aligned} PE_{\text{uncontrolled}} &= 9.1 \text{ lb-PM}_{10}/\text{week} \times (1/(1 - 99\%)) \times 52 \text{ weeks/year} \\ &= 36,500 \text{ lb-PM}_{10}/\text{year} \end{aligned}$$

b. C-954-2-4: WOOD PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN, BINKS MODEL PFF-16-10-T-LH SPRAY PAINT BOOTH WITH EXHAUST FILTERS AND VERID GUNWASHER MODEL 200-1 (COMMON WITH C-954-1) AND LOCATED IN BLDG #290, FURNITURE FACTORY

This unit contains an emission limit for VOC and PM<sub>10</sub>. However this unit is not equipped with an add-on control for VOC. Therefore, CAM is not triggered for VOC emissions. This unit is equipped with an add-on control for PM<sub>10</sub> in the form of a paint booth with exhaust filters. However, as shown below, the pre-control potential to emit is not greater than the major source threshold of 140,000 pounds PM<sub>10</sub>/year. Therefore, this permit unit is not subject to CAM.

The PM<sub>10</sub> emission limit for units C-954-1, -2, and -14 is 9.1 lb-PM<sub>10</sub>/week. For worst case scenario it is assumed this unit will emit 9.1 lb-PM<sub>10</sub>/week for 52 weeks per year. The paint booth with exhaust filters has a control efficiency of 99%.

$$\begin{aligned} PE_{\text{uncontrolled}} &= 9.1 \text{ lb-PM}_{10}/\text{week} \times (1/(1 - 99\%)) \times 52 \text{ weeks/year} \\ &= 36,500 \text{ lb-PM}_{10}/\text{year} \end{aligned}$$

- c. C-954-3-4: WOOD FURNITURE FACTORY LOCATED IN BLDG #290 WITH WOODWORKING OPERATION CONSISTING OF 4 TABLE SAWS, 1 CHOP SAW, 1 BAND SAW, 1 PANEL SAW, 1 CNC PANEL SAW, 1 CNC SAW, 5 SANDERS, 2 SHAPERS, 1 CLEANER, 1 PLANER, 1 EDGE BANDER, 3 CNC ROUTERS, 1 PIN ROUTER, 2 DRAWER DOVETAILER AND OTHER RELATED EQUIPMENTS, ALL SERVED BY AN R.P. RICHARDS MODEL 12-216-3464 BAGHOUSE DUST COLLECTOR WITH REVERSE PULSED-JET CLEANING SYSTEM

This unit contains an emission limit for PM<sub>10</sub>. The unit is equipped with an add-on control in the form of a baghouse dust collector. However, as shown below, the pre-control potential to emit is not greater than the major source threshold of 140,000 pounds PM<sub>10</sub>/year. Therefore, this permit unit is not subject to CAM.

The PM<sub>10</sub> emission limit for this unit is 1.1 lb-PM<sub>10</sub>/day. It's assumed the baghouse dust collector has a control efficiency of 99%. The unit may be operated 365 days/year.

$$\begin{aligned} PE_{\text{uncontrolled}} &= 1.1 \text{ lb-PM}_{10}/\text{week} \times (1/(1 - 99\%)) \times 365 \text{ weeks/year} \\ &= 40,150 \text{ lb-PM}_{10}/\text{year} \end{aligned}$$

- d. C-954-4-7: POWDER COATING OPERATION CONSISTING OF POWDER COATING BOOTH, 1.8 MMBTU/HR DRY-OFF OVEN, 3.3 MMBTU/HR BAKE OVEN AND 0.34 MMBTU/HR CONTROLLED PYROLYSIS FURNACE WITH INTEGRAL AFTERBURNER FOR PARTS HANGER CLEANING

This operation contains NO<sub>x</sub>, CO, VOC, PM<sub>10</sub>, and SO<sub>x</sub> emission factors for the ovens and furnace. However, these emissions units are not equipped with an add-on control. The powder coating operation contains an emission limit for PM<sub>10</sub> for the coating of metal parts and products. The application of powder coating has an add-on control in the form of a powder coating booth. However, as shown below, the pre-control potential to emit is not greater than the major source threshold of 140,000 pounds PM<sub>10</sub>/year. Therefore, this permit unit is not subject to CAM.

This operation is limited to applying 600 lb-powder/day per permit requirements. It's assumed that 100% of the powder is PM<sub>10</sub>. Per AP-42 Table 4.2.2.4-2, the transfer efficiency for powder coating is at least 95%. The unit may be operated 365 days/year.

$$\begin{aligned} PE_{\text{uncontrolled}} &= \text{Powder Coating Usage} \times (1 - \text{Transfer Efficiency}) \times 365 \text{ day/year} \\ &= 600 \text{ lb-powder} \times 1 \text{ lb-PM}_{10}/1 \text{ lb-powder} \times (1 - 0.95) \times 365 \text{ day/year} \\ &= 10,950 \text{ lb-PM}_{10}/\text{year} \end{aligned}$$

e. C-954-10-3: POWDER COATING OPERATION WITH ELECTROSTATIC APPLICATION EQUIPMENT, BOOTH WITH DRY FILTERS AND 0.75 MMBTU/HR NATURAL GAS-FIRED BATCH CURING OVEN

This operation contains NO<sub>x</sub> emission factors for the oven. However, this emissions unit is not equipped with an add-on control. Therefore, CAM is not triggered by this operation. The powder coating operation contains an emission limit for PM<sub>10</sub> for the coating of metal parts and products. The application of powder coating has an add-on control in the form of a powder coating booth. However, as shown below, the pre-control potential to emit is not greater than the major source threshold of 140,000 pounds PM<sub>10</sub>/year. Therefore, this permit unit is not subject to CAM.

This operation is limited to applying 600 lb-powder/day per permit requirements. It's assumed that 100% of the powder is PM<sub>10</sub>. Per AP-42 Table 4.2.2.4-2, the transfer efficiency for powder coating is at least 95%. The unit may be operated 365 days/year.

$$\begin{aligned} PE_{\text{uncontrolled}} &= \text{Powder Coating Usage} \times (1 - \text{Transfer Efficiency}) \times 365 \text{ day/year} \\ &= 319 \text{ lb-powder} \times 1 \text{ lb-PM}_{10}/1 \text{ lb-powder} \times (1 - 0.95) \times 365 \text{ day/year} \\ &= 5,822 \text{ lb-PM}_{10}/\text{year} \end{aligned}$$

f. C-954-12-2: 1,250 HP CATERPILLAR MODEL 3412 STA DIESEL-FIRED EMERGENCY IC ENGINE POWERING A 800 KW ELECTRICAL GENERATOR

This unit contains an emission limit for NO<sub>x</sub> and PM<sub>10</sub>. However this unit is not equipped with an add-on control for NO<sub>x</sub>. Therefore, CAM is not triggered for NO<sub>x</sub> emissions. This unit is equipped with an add-on control in the form of a positive crankcase ventilation system. However, as shown below, the pre-control potential to emit is not greater than the major source threshold of 140,000 pounds PM<sub>10</sub>/year. Therefore, this permit unit is not subject to CAM.

The PM<sub>10</sub> emission limit for this unit is 0.14 g/hp-hr. It is assumed the positive crankcase ventilation system has a control efficiency of 90%. The unit is limited to operate 50 hr/year.

$$\begin{aligned} PE_{\text{uncontrolled}} &= [0.14 \text{ g/hp-hr} \times 1250 \text{ hp} \times 50 \text{ hr/year} \times (1/(1 - 90\%))] / [453.6 \text{ g/lb}] \\ &= 192 \text{ lb-PM}_{10}/\text{year} \end{aligned}$$

d. C-945-14-2: CHAIR MANUFACTURING AND FINISHING BUILDING #290 WITH A NEW CONVEYORIZED UV COATING LINE CONSISTING OF AN INCLINED UV CURING SYSTEM, A BELT CONVEYOR, A ROTARY SANDING/DENIBBING MACHINE, A RECIPROCATING SPRAY MACHINE, A PANEL BRUSHING MACHINE, A BELT CONVEYOR FOR HAND SANDING, A BELT CONVEYOR FOR HAND WIPING, AND A MULTI-LEVEL FLASH-OFF OVEN SYSTEM (ELECTRIC OVEN) EXHAUSTED THROUGH DANThERM

MODEL CS-3-M BAGHOUSE INCLUDING A 40 HP BLOWER AND  
FILTRATION UNIT

This unit contains an emission limit for VOC and PM<sub>10</sub>. However this unit is not equipped with an add-on control for VOC. Therefore, CAM is not triggered for VOC emissions. This unit is equipped with an add-on control for PM<sub>10</sub> in the form of a paint booth with exhaust filters. However, as shown below, the pre-control potential to emit is not greater than the major source threshold of 140,000 pounds PM<sub>10</sub>/year. Therefore, this permit unit is not subject to CAM.

The PM<sub>10</sub> emission limit for units C-954-1, -2, and -14 is 9.1 lb-PM<sub>10</sub>/week. For worst case scenario it is assumed this unit will emit 9.1 lb-PM<sub>10</sub>/week for 52 weeks per year. The paint booth with exhaust filters has a control efficiency of 99%.

$$\begin{aligned} PE_{\text{uncontrolled}} &= 9.1 \text{ lb-PM}_{10}/\text{week} \times (1/(1 - 99\%)) \times 52 \text{ weeks/year} \\ &= 36,500 \text{ lb-PM}_{10}/\text{year} \end{aligned}$$

## **IX. PERMIT SHIELD**

A permit shield legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Title V permit. Compliance with the terms and conditions of the Operating Permit is considered compliance with all applicable requirements upon which those conditions are based, including those that have been subsumed.

### **A. Requirements Addressed by Model General Permit Templates**

#### **1. Model General Permit Template SJV-UM-0-3**

By submitting Model General Permit Template SJV-UM-0-3 qualification form, the applicant has requested that a permit shield be granted for all the applicable requirements identified by the template. Therefore, the permit shields as granted in Model General Permit Template is included as conditions 40 and 41 of the facility-wide requirements (C-945-0-2).

### **B. Requirements not Addressed by Model General Permit Templates**

The facility is not requesting any permit shields.

### **C. Obsolete Permit Shields From Existing Permit Requirements**

There are no obsolete permit shields to remove from the permits.

**X. PERMIT CONDITIONS**

See Attachment A - Draft Renewed Title V Operating Permit.

**XI. ATTACHMENTS**

- A. Draft Renewed Title V Operating Permit
- B. Previous Title V Operating Permit
- C. Detailed Facility List

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# ATTACHMENT A

Draft Renewed Title V Operating Permit

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# San Joaquin Valley Air Pollution Control District

FACILITY: C-954-0-2

EXPIRATION DATE: 08/31/2011

## FACILITY-WIDE REQUIREMENTS

1. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. {4362} The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. {4363} The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
4. {4364} The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
5. {4365} Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
6. {4366} The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.9.1 and 9.13.1] Federally Enforceable Through Title V Permit
7. {4367} A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
8. {4368} Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
9. {4369} The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name: PRISON INDUSTRY AUTHORITY--AVENAL

Location: 1 KINGS WAY, AVENAL, CA 93204

C-954-0-2 : Oct 9 2012 9:00AM -- GONZALEV

10. {4370} The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
11. {4371} The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
12. {4372} Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
13. {4373} If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
14. {4374} It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
15. {4375} The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
16. {4376} The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
17. {4377} The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
18. {4378} The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
19. {4379} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
20. {4380} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
21. {4381} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
22. {4382} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

23. {4383} No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
24. {4384} No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
25. {4385} All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
26. {4386} The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
27. {4387} With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
28. {4388} If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
29. {4389} If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
30. {4390} Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8021 and 8011] Federally Enforceable Through Title V Permit
31. {4391} Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8031 and 8011] Federally Enforceable Through Title V Permit
32. {4392} An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8041 and 8011] Federally Enforceable Through Title V Permit
33. {4393} Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8051 and 8011] Federally Enforceable Through Title V Permit
34. {4394} Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8061 and Rule 8011] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

35. {4395} Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rule 8071 and Rule 8011] Federally Enforceable Through Title V Permit
36. {4396} Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit
37. {4397} The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
38. {4398} The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
39. {4399} When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
40. {4400} Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. {4401} Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
42. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin April 1 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2201] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-954-1-4

**EXPIRATION DATE:** 08/31/2011

**EQUIPMENT DESCRIPTION:**

WOOD PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN, BINKS MODEL PFF-16-10 T-LH SPRAY PAINT BOOTH WITH EXHAUST FILTERS, AND VERID GUNWASHER MODEL 200-1 (COMMON WITH C-954-2)

## PERMIT UNIT REQUIREMENTS

1. Permit units C-954-1 and C-954-2 shall not be operated simultaneously. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The combined weekly emissions from equipment operated under permits C-954-1, C-954-2 and C-954-14 shall not exceed 224 lb of VOC and 9.1 lb of PM10. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
5. VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: clear topcoat 275 g/l (2.3 lb/gallon), filler 275 g/l (2.3 lb/gallon), high-solids stains 240 g/l (2.0 lb/gallon), ink 500 g/l (4.2 lb/gallon), mold-seal coating 750 g/l (6.3 lb/gallon), multi-colored coating 275 g/l (2.3 lb/gallon), pigmented coating 275 g/l (2.3 lb/gallon), sanding sealer 275 g/l (2.3 lb/gallon). [District Rule 4606] Federally Enforceable Through Title V Permit
6. VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: low-solids stain 120 g/l (1.0 lb/gallon), stripper 350 g/l (2.9 lb/gallon). [District Rule 4606] Federally Enforceable Through Title V Permit
7. VOC content of strippable booth coating shall not exceed 450 g/l (3.8 lb/gallon) as applied, excluding water and exempt compounds. [District Rule 4606] Federally Enforceable Through Title V Permit
8. Only HVLP, electrostatic, brush, dip, flow, or roll coating application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4606] Federally Enforceable Through Title V Permit
9. Permittee shall demonstrate that HVLP guns manufactured prior to 1/1/96 operate between 0.1 and 10 psig air atomizing pressure, by manufacturer's published technical material or by use of a certified air pressure tip gauge. [District Rule 4606] Federally Enforceable Through Title V Permit
10. All fresh or spent coatings, adhesives, catalysts, thinners and solvents shall be stored in closed containers. Solvent laden cloth or paper shall be stored and disposed in closed non-absorbent containers. [District Rule 4606] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

11. Cleaning activities that use solvents with a VOC content greater than 50 g/l (0.42 lb/gallon) shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4606] Federally Enforceable Through Title V Permit
12. Permittee shall not use materials with a VOC content greater than 50 g/l (0.42 lb/gallon) for spray equipment clean-up unless an enclosed system, or equipment proven to be equally effective at controlling emissions, is used for cleaning. [District Rule 4606]
13. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal), repair and maintenance cleaning: 50 g/l (0.42 lb/gal), and cleaning of coating application equipment: 550 g/l (4.6 lb/gal). [District Rule 4606] Federally Enforceable Through Title V Permit
14. The daily emissions from this booth shall not exceed 64.0 lb of VOC and 2.6 lb of PM10. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Permittee shall maintain daily records of the following: quantity and type of coatings and solvents used, mix ratios of volume of components added to each coating, volume of coatings applied, VOC content of each coating as applied, and VOC content of each solvent or stripper. [District Rule 4606] Federally Enforceable Through Title V Permit
16. Permittee shall keep the following records for solvent cleaning activities: manufacturers product data sheet or MSDS of solvents used, VOC content of solvents in g/l or lb/gal, and the type of cleaning activity for which each solvent is used. [District Rule 4606] Federally Enforceable Through Title V Permit
17. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4606] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

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# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-954-2-4

EXPIRATION DATE: 08/31/2011

## EQUIPMENT DESCRIPTION:

WOOD PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN, BINKS MODEL PFF-16, 10" T-LH SPRAY PAINT BOOTH WITH EXHAUST FILTERS AND VERID GUNWASHER MODEL 200-1 (COMMON WITH C-954-1) AND LOCATED IN BLDG #290, FURNITURE FACTORY

## PERMIT UNIT REQUIREMENTS

1. Permit units C-953-1 and C-954-2 shall not be operated simultaneously. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The combined weekly emissions from equipment operated under permits C-954-1, C-954-2 and C-954-14 shall not exceed 224 lb of VOC and 9.1 lb of PM10. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
5. VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: clear topcoat 275 g/l (2.3 lb/gallon), filler 275 g/l (2.3 lb/gallon), high-solids stains 240 g/l (2.0 lb/gallon), ink 500 g/l (4.2 lb/gallon), mold-seal coating 750 g/l (6.3 lb/gallon), multi-colored coating 275 g/l (2.3 lb/gallon), pigmented coating 275 g/l (2.3 lb/gallon), sanding sealer 275 g/l (2.3 lb/gallon). [District Rule 4606] Federally Enforceable Through Title V Permit
6. VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: low-solids stain 120 g/l (1.0 lb/gallon), stripper 350 g/l (2.9 lb/gallon). [District Rule 4606] Federally Enforceable Through Title V Permit
7. VOC content of strippable booth coating shall not exceed 450 g/l (3.8 lb/gallon) as applied, excluding water and exempt compounds. [District Rule 4606] Federally Enforceable Through Title V Permit
8. Only HVLP, electrostatic, brush, dip, flow, or roll coating application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4606] Federally Enforceable Through Title V Permit
9. Permittee shall demonstrate that HVLP guns manufactured prior to 1/1/96 operate between 0.1 and 10 psig air atomizing pressure, by manufacturer's published technical material or by use of a certified air pressure tip gauge. [District Rule 4606] Federally Enforceable Through Title V Permit
10. All fresh or spent coatings, adhesives, catalysts, thinners and solvents shall be stored in closed containers. Solvent laden cloth or paper shall be stored and disposed in closed non-absorbent containers. [District Rule 4606] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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11. Cleaning activities that use solvents with a VOC content greater than 50 g/l (0.42 lb/gallon) shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4606] Federally Enforceable Through Title V Permit
12. Permittee shall not use materials with a VOC content greater than 50 g/l (0.42 lb/gallon) for spray equipment clean-up unless an enclosed system, or equipment proven to be equally effective at controlling emissions, is used for cleaning. [District Rule 4606] Federally Enforceable Through Title V Permit
13. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal), repair and maintenance cleaning: 50 g/l (0.42 lb/gal), and cleaning of coating application equipment: 550 g/l (4.6 lb/gal). [District Rule 4606] Federally Enforceable Through Title V Permit
14. The daily emissions from this booth shall not exceed 64.0 lb of VOC and 2.6 lb of PM10. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Permittee shall maintain daily records of the following: quantity and type of coatings and solvents used, mix ratios of volume of components added to each coating, volume of coatings applied, VOC content of each coating as applied, and VOC content of each solvent or stripper. [District Rule 4606] Federally Enforceable Through Title V Permit
16. Permittee shall keep the following records for solvent cleaning activities: manufacturers product data sheet or MSDS of solvents used, VOC content of solvents in g/l or lb/gal, and the type of cleaning activity for which each solvent is used. [District Rule 4606] Federally Enforceable Through Title V Permit
17. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4606] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

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# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-954-3-4

EXPIRATION DATE: 08/31/2011

## EQUIPMENT DESCRIPTION:

WOOD FURNITURE FACTORY LOCATED IN BLDG #290 WITH WOODWORKING OPERATION CONSISTING OF 4 TABLE SAWS, 1 CHOP SAW, 1 BAND SAW, 1 PANEL SAW, 1 CNC PANEL SAW, 1 CNC SAW, 5 SANDERS, 2 SHAPERS, 1 CLEANER, 1 PLANER, 1 EDGE BANDER, 3 CNC ROUTERS, 1 PIN ROUTER, 2 DRAWER DOVETAILED AND OTHER RELATED EQUIPMENTS, ALL SERVED BY AN R.P. RICHARDS MODEL 12-216-3464 BAGHOUSE DUST COLLECTOR WITH REVERSE PULSED-JET CLEANING SYSTEM

## PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. Visible emissions from the exhaust of the dust collector serving the woodworking operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The PM10 emissions from the dust collector shall not exceed 1.1 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. All ducting and control equipment shall be in good working order to prevent fugitive particulate emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
6. All filters shall be properly maintained and must be in place during the woodworking operation(s). [District Rule 2201] Federally Enforceable Through Title V Permit
7. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The baghouse shall operate at all times with a minimum differential pressure of 0.5 inches water column and a maximum differential pressure of 4 inches water column. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201]
11. Dust collector exhaust fan(s) shall be switched on prior to the start-up of any woodworking equipment. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Replacement bags numbering at least 10% of the total number of bags in the baghouse shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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14. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter breakthrough and shall be replaced as needed. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Records of dust collector maintenance, inspections, and repairs including all change outs of filter media, shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records of the daily differential operating pressure readings shall be retained on-site. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-954-4-7

**EXPIRATION DATE:** 08/31/2011

**EQUIPMENT DESCRIPTION:**

POWDER COATING OPERATION CONSISTING OF POWDER COATING BOOTH, 1.8 MMBTU/HR DRY-OFF OVEN, 3.3 MMBTU/HR BAKE OVEN AND 0.34 MMBTU/HR CONTROLLED PYROLYSIS FURNACE WITH INTEGRAL AFTERBURNER FOR PARTS HANGER CLEANING

## PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. Only PUC-regulated natural gas shall be used as fuel for the ovens and Controlled Pyrolysis burn-off furnace. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Emissions from the Controlled Pyrolysis burn-off furnace shall not exceed any of the following limits: 0.0271 lb-NOx/hr, 0.05 lb-CO/hr, 0.0174 lb-VOC/hr, 0.0133 lb-PM10, and 0.0018 lb-SOx/hr. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Emissions from the natural gas-fired ovens shall not exceed any of the following limits: 0.1 lb-NOx/MMBtu, 0.084 lb-CO/MMBtu, 0.0076 lb-PM10/MMBtu, 0.0055 lb-VOC/MMBtu, and 0.0006 lb-SOx/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Daily usage of powder coating shall not exceed 600 pounds. [District Rule 2201] Federally Enforceable Through Title V Permit
7. All coating shall be conducted in booth with filters in place and fan(s) operating. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Only electrostatic application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Powder coating material shall not contain VOC's. Manufacturer's Material Safety Data Sheets may be used to confirm the VOC content of the powder coating. [District Rules 2201 and 4603] Federally Enforceable Through Title V Permit
10. Permittee shall maintain daily records of number of pounds of powder coating used. [District Rule 1070] Federally Enforceable Through Title V Permit
11. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
12. Operator shall maintain copies of fuel invoices. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
13. Visible emissions from the dust collector shall be checked annually. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-954-10-3

**EXPIRATION DATE:** 08/31/2011

**EQUIPMENT DESCRIPTION:**

POWDER COATING OPERATION WITH ELECTROSTATIC APPLICATION EQUIPMENT, BOOTH WITH DRY FILTERS AND 0.75 MMBTU/HR NATURAL GAS-FIRED BATCH CURING OVEN

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Only PUC-regulated natural gas shall be used as fuel for the oven. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Daily usage of powder coating shall not exceed 319 pounds. [District Rule 2201] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
5. All coating shall be conducted in booth with filters in place and fan(s) operating. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Only electrostatic application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Powder coating material shall not contain VOC's. Manufacturer's Material Safety Data Sheets may be used to confirm the VOC content of the powder coating. [District Rules 2201 and 4603] Federally Enforceable Through Title V Permit
8. Permittee shall maintain daily records of number of pounds of powder coating used. [District Rule 1070] Federally Enforceable Through Title V Permit
9. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
10. NOx emissions from the natural gas-fired oven shall not exceed 0.1 lb-NOx/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Operator shall maintain copies of fuel invoices. [District Rule 2520] Federally Enforceable Through Title V Permit
12. Visible emissions from the dust collector shall be checked annually. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-954-12-2

**EXPIRATION DATE:** 08/31/2011

**EQUIPMENT DESCRIPTION:**

1,250 HP CATERPILLAR MODEL 3412 STA DIESEL-FIRED EMERGENCY IC ENGINE POWERING A 800 KW ELECTRICAL GENERATOR.

## PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. This engine shall be equipped with a positive crankcase ventilation (PCV) system that recirculates crankcase emissions into the air intake system for combustion. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap, roof overhang, or any other obstruction. [District Rule 4102]
4. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702, 17 CCR 93115, and 40 CFR63, ZZZZ] Federally Enforceable Through Title V Permit
5. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801, and 17 CCR 93115] Federally Enforceable Through Title V Permit
6. NOx Emissions shall not exceed 5.91 g/hp-hr. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The PM10 emissions rate shall not exceed 0.14 g/hp-hr. [District Rules 2201 and 4102, and 17 CCR 93115] Federally Enforceable Through Title V Permit
8. This engine shall be operated only for maintenance, testing, and required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 50 hours per calendar year. [District Rule 4702, 17 CCR 93115, and 40 CFR63, ZZZZ] Federally Enforceable Through Title V Permit
9. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702] Federally Enforceable Through Title V Permit
10. During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702] Federally Enforceable Through Title V Permit
11. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702] Federally Enforceable Through Title V Permit
12. This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rule 4702] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

13. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, and the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.). For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rules 4702 and 2520, and 17 CCR 93115] Federally Enforceable Through Title V Permit
14. The permittee shall maintain monthly records of the type of fuel purchased, the amount of fuel purchased, date when the fuel was purchased, signature of the permittee who received the fuel, and signature of the fuel supplier indicating that the fuel was delivered. [District Rule 2520 and 4702, and 17 CCR 93115] Federally Enforceable Through Title V Permit
15. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 4702 and 2520, 17 CCR 93115 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
16. On and after May 3, 2013, the permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
17. On and after May 3, 2013, the engine shall be in full compliance with 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
18. On and after May 3, 2013, the engine's oil and filter shall be changed every 500 hours of operation or every 12 months, whichever comes first. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
19. On and after May 3, 2013, the engine's air filter shall be inspected every 1,000 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
20. On and after May 3, 2013, the engine's hoses and belts shall be inspected every 500 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
21. On and after May 3, 2013, the permittee shall maintain monthly records of all performance tests and required maintenance performed on the air pollution control and monitoring equipment. [District Rule 1070 and 40 CFR 63, ZZZZ] Federally Enforceable Through Title V Permit
22. On and after May 3, 2013, the permittee shall maintain monthly records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. The permittee shall also maintain monthly records of action taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [District Rule 1070 and 40 CFR 63, ZZZZ] Federally Enforceable Through Title V Permit
23. The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Tables 2c and 2d of Subpart ZZZZ. The oil analysis must be performed at the same frequency specified for changing the oil in Table 2c or 2d to this subpart. The analysis program must at a minimum analyze the following three parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Base Number is less than 30 percent of the Total Base Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the engine owner or operator must change the oil within 2 days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the engine owner or operator must change the oil within 2 days or before commencing operation, whichever is later. The owner or operator must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-954-14-2

**EXPIRATION DATE:** 08/31/2011

**EQUIPMENT DESCRIPTION:**

CHAIR MANUFACTURING AND FINISHING BUILDING #290 WITH A NEW CONVEYORIZED UV COATING LINE CONSISTING OF AN INCLINED UV CURING SYSTEM, A BELT CONVEYOR, A ROTARY SANDING/DENIBBING MACHINE, A RECIPROCATING SPRAY MACHINE, A PANEL BRUSHING MACHINE, A BELT CONVEYOR FOR HAND SANDING, A BELT CONVEYOR FOR HAND WIPING, AND A MULTI-LEVEL FLASH-OFF OVEN SYSTEM (ELECTRIC OVEN) EXHAUSTED THROUGH DANThERM MODEL CS-3-M BAGHOUSE INCLUDING A 40 HP BLOWER AND FILTRATION UNIT

## PERMIT UNIT REQUIREMENTS

1. The combined weekly emissions from equipment operated under permits C-954-1, C-954-2 and C-953-14 shall not exceed 224 lb-VOC and 9.1 lb-PM10. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Visible emissions from the exhaust of the dust collector serving the woodworking operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
4. All painting applications shall be conducted inside the booth with filters in place, fan(s) operating, and doors closed. [District Rule 2201] Federally Enforceable Through Title V Permit
5. PM10 emissions from the dust collector shall not exceed 0.004 gr/dscf. [District Rules 2201 and 4201] Federally Enforceable Through Title V Permit
6. The daily emissions from this operation shall not exceed 0.3 lb-VOC/day and 21.9 lb-PM10/day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: clear topcoat 275 g/l (2.3 lb/gallon), filler 275 g/l (2.3 lb/gallon), high-solids stains 240 g/l (2.0 lb/gallon), ink 500 g/l (4.2 lb/gallon), mold-seal coating 750 g/l (6.3 lb/gallon), multi-colored coating 275 g/l (2.3 lb/gallon), pigmented coating 275 g/l (2.3 lb/gallon), sanding sealer 275 g/l (2.3 lb/gallon). [District Rules 2201 and 4606] Federally Enforceable Through Title V Permit
8. VOC content of coatings as applied, used for wood product, shall not exceed any of the following limits: low-solids stain 120 g/l (1.0 lb/gallon), stripper 350 g/l (2.9 lb/gallon). [District Rules 2201 and 4606] Federally Enforceable Through Title V Permit
9. VOC content of strippable booth coating shall not exceed 450 g/l (3.8 lb/gallon) as applied, excluding water and exempt compounds. [District Rule 4606] Federally Enforceable Through Title V Permit
10. Only HVLP, electrostatic, brush, dip, flow, or roll coating application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4606] Federally Enforceable Through Title V Permit
11. Permittee shall demonstrate that HVLP guns manufactured prior to 1/1/96 operate between 0.1 and 10 psig air atomizing pressure, by manufacturer's published technical material or by use of a certified air pressure tip gauge. [District Rule 4606] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

12. All fresh or spent coatings, adhesives, catalysts, thinners and solvents shall be stored in closed containers. Solvent laden cloth or paper shall be stored and disposed in closed non-absorbent containers. [District Rule 4606] Federally Enforceable Through Title V Permit
13. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal), repair and maintenance cleaning: 25 g/l (0.21 lb/gal), and cleaning of coating application equipment: 25 g/l (0.21 lb/gal). [District Rule 4606] Federally Enforceable Through Title V Permit
14. Permittee shall not use cleaning material with a VOC content greater than 25 g/l (0.21 lb/gallon) for all solvent cleaning operations unless such cleaning operations are carried out within an APCO-approved emission control system. [District Rule 4606] Federally Enforceable Through Title V Permit
15. An operator shall store or dispose of fresh or spent solvents, waste solvent cleaning material such as cloth, paper, etc, coating, adhesives, catalysts, and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4606] Federally Enforceable Through Title V Permit
16. Records of all maintenance of the dust collector, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Permittee shall maintain daily records of the following: quantity and type of coatings and solvents used, mix ratios (by volume) of components added to each coating, volume of coatings applied, VOC content of each coating as applied, and VOC content of each solvent or stripper. [District Rule 4606] Federally Enforceable Through Title V Permit
18. Permittee shall keep the following records for solvent cleaning activities: manufacturers product data sheet or MSDS of solvents used, VOC content of solvents in g/l or lb/gal, and the type of cleaning activity for which each solvent is used. [District Rule 4606] Federally Enforceable Through Title V Permit
19. Each container or accompanying data sheet of any coating subject to this rule shall display the maximum VOC content of the coating, as applied after any thinning as recommended by the manufacturer. VOC content shall be displayed as grams of VOC per liter (or pounds of VOC per gallon) of coating, less water and exempt compounds. VOC content displayed may be calculated using product formulation data, or may be determined using the test method in District Rule 4606, Section 6.8. [District Rule 4606] Federally Enforceable Through Title V Permit
20. Each container or accompanying data sheet of any coating subject to this rule shall display the manufacturer's recommendation regarding thinning of the coating. This requirement shall not apply to the thinning of coatings with water. [District Rule 4606] Federally Enforceable Through Title V Permit
21. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4606] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

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# ATTACHMENT B

Previous Title V Operating Permit

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**San Joaquin Valley**  
AIR POLLUTION CONTROL DISTRICT



**HEALTHY AIR LIVING™**

# Permit to Operate

**FACILITY:** C-954

**EXPIRATION DATE:** 08/31/2011

**LEGAL OWNER OR OPERATOR:**

PRISON INDUSTRY AUTHORITY--AVENAL

**MAILING ADDRESS:**

#1 KINGS WAY  
AVENAL, CA 93204

**FACILITY LOCATION:**

1 KINGS WAY  
AVENAL, CA 93204

**FACILITY DESCRIPTION:**

CORRECTIONAL INSTITUTION

The Facility's Permit to Operate may include Facility-wide Requirements as well as requirements that apply to specific permit units.

This Permit to Operate remains valid through the permit expiration date listed above, subject to payment of annual permit fees and compliance with permit conditions and all applicable local, state, and federal regulations. This permit is valid only at the location specified above, and becomes void upon any transfer of ownership or location. Any modification of the equipment or operation, as defined in District Rule 2201, will require prior District approval. This permit shall be posted as prescribed in District Rule 2010.

**Seyed Sadredin**

Executive Director / APCO

**David Warner**

Director of Permit Services

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-954-1-6

**EXPIRATION DATE:** 08/31/2011

**EQUIPMENT DESCRIPTION:**

WOOD PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN, BINKS MODEL PFF-16-10-T-LH SPRAY PAINT BOOTH WITH EXHAUST FILTERS, AND VERID GUNWASHER MODEL 200-1 (COMMON WITH C-954-2)

## PERMIT UNIT REQUIREMENTS

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1. Permit units C-954-1 and C-954-2 shall not be operated simultaneously. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The combined weekly emissions from equipment operated under permits C-954-1, C-954-2 and C-954-14 shall not exceed 224 lb of VOC and 9.1 lb of PM10. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
5. VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: clear topcoat 275 g/l (2.3 lb/gallon), filler 275 g/l (2.3 lb/gallon), high-solids stains 240 g/l (2.0 lb/gallon), ink 500 g/l (4.2 lb/gallon), mold-seal coating 750 g/l (6.3 lb/gallon), multi-colored coating 275 g/l (2.3 lb/gallon), pigmented coating 275 g/l (2.3 lb/gallon), sanding sealer 275 g/l (2.3 lb/gallon). [District Rule 4606] Federally Enforceable Through Title V Permit
6. VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: low-solids stain 120 g/l (1.0 lb/gallon), stripper 350 g/l (2.9 lb/gallon). [District Rule 4606] Federally Enforceable Through Title V Permit
7. VOC content of strippable booth coating shall not exceed 450 g/l (3.8 lb/gallon) as applied, excluding water and exempt compounds. [District Rule 4606] Federally Enforceable Through Title V Permit
8. Only HVLP, electrostatic, brush, dip, flow, or roll coating application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4606] Federally Enforceable Through Title V Permit
9. Permittee shall demonstrate that HVLP guns manufactured prior to 1/1/96 operate between 0.1 and 10 psig air atomizing pressure, by manufacturer's published technical material or by use of a certified air pressure tip gauge. [District Rule 4606] Federally Enforceable Through Title V Permit
10. All fresh or spent coatings, adhesives, catalysts, thinners and solvents shall be stored in closed containers. Solvent laden cloth or paper shall be stored and disposed in closed non-absorbent containers. [District Rule 4606] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

11. Cleaning activities that use solvents with a VOC content greater than 50 g/l (0.42 lb/gallon) shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4606] Federally Enforceable Through Title V Permit
12. Permittee shall not use materials with a VOC content greater than 50 g/l (0.42 lb/gallon) for spray equipment clean-up unless an enclosed system, or equipment proven to be equally effective at controlling emissions, is used for cleaning. [District Rule 4606] Federally Enforceable Through Title V Permit
13. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal), repair and maintenance cleaning (except, until June 30, 2005, cleaning of ultraviolet lamps used for the curing of ultraviolet ink or coatings): 50 g/l (0.42 lb/gal), and cleaning of coating application equipment: 550 g/l (4.6 lb/gal). [District Rule 4606] Federally Enforceable Through Title V Permit
14. The daily emissions from this booth shall not exceed 64.0 lb of VOC and 2.6 lb of PM10. [District NSR Rule] Federally Enforceable Through Title V Permit
15. Permittee shall maintain daily records of the following: quantity and type of coatings and solvents used, mix ratios of volume of components added to each coating, volume of coatings applied, VOC content of each coating as applied, and VOC content of each solvent or stripper. [District Rule 4606] Federally Enforceable Through Title V Permit
16. Permittee shall keep the following records for solvent cleaning activities: manufacturers product data sheet or MSDS of solvents used, VOC content of solvents in g/l or lb/gal, and the type of cleaning activity for which each solvent is used. [District Rule 4606] Federally Enforceable Through Title V Permit
17. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4606] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-954-2-6

**EXPIRATION DATE:** 08/31/2011

**EQUIPMENT DESCRIPTION:**

WOOD PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN, BINKS MODEL PFF-16-10-T-LH SPRAY PAINT BOOTH WITH EXHAUST FILTERS AND VERID GUNWASHER MODEL 200-1 (COMMON WITH C-954-1) AND LOCATED IN BLDG #290, FURNITURE FACTORY

## PERMIT UNIT REQUIREMENTS

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1. Permit units C-953-1 and C-954-2 shall not be operated simultaneously. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The combined weekly emissions from equipment operated under permits C-954-1, C-954-2 and C-954-14 shall not exceed 224 lb of VOC and 9.1 lb of PM10. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
5. VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: clear topcoat 275 g/l (2.3 lb/gallon), filler 275 g/l (2.3 lb/gallon), high-solids stains 240 g/l (2.0 lb/gallon), ink 500 g/l (4.2 lb/gallon), mold-seal coating 750 g/l (6.3 lb/gallon), multi-colored coating 275 g/l (2.3 lb/gallon), pigmented coating 275 g/l (2.3 lb/gallon), sanding sealer 275 g/l (2.3 lb/gallon). [District Rule 4606] Federally Enforceable Through Title V Permit
6. VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: low-solids stain 120 g/l (1.0 lb/gallon), stripper 350 g/l (2.9 lb/gallon). [District Rule 4606] Federally Enforceable Through Title V Permit
7. VOC content of strippable booth coating shall not exceed 450 g/l (3.8 lb/gallon) as applied, excluding water and exempt compounds. [District Rule 4606] Federally Enforceable Through Title V Permit
8. Only HVLP, electrostatic, brush, dip, flow, or roll coating application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4606] Federally Enforceable Through Title V Permit
9. Permittee shall demonstrate that HVLP guns manufactured prior to 1/1/96 operate between 0.1 and 10 psig air atomizing pressure, by manufacturer's published technical material or by use of a certified air pressure tip gauge. [District Rule 4606] Federally Enforceable Through Title V Permit
10. All fresh or spent coatings, adhesives, catalysts, thinners and solvents shall be stored in closed containers. Solvent laden cloth or paper shall be stored and disposed in closed non-absorbent containers. [District Rule 4606] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

11. Cleaning activities that use solvents with a VOC content greater than 50 g/l (0.42 lb/gallon) shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4606] Federally Enforceable Through Title V Permit
12. Permittee shall not use materials with a VOC content greater than 50 g/l (0.42 lb/gallon) for spray equipment clean-up unless an enclosed system, or equipment proven to be equally effective at controlling emissions, is used for cleaning. [District Rule 4606] Federally Enforceable Through Title V Permit
13. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal), repair and maintenance cleaning (except, until June 30, 2005, cleaning of ultraviolet lamps used for the curing of ultraviolet ink or coatings): 50 g/l (0.42 lb/gal), and cleaning of coating application equipment: 550 g/l (4.6 lb/gal). [District Rule 4606] Federally Enforceable Through Title V Permit
14. The daily emissions from this booth shall not exceed 64.0 lb of VOC and 2.6 lb of PM10. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Permittee shall maintain daily records of the following: quantity and type of coatings and solvents used, mix ratios of volume of components added to each coating, volume of coatings applied, VOC content of each coating as applied, and VOC content of each solvent or stripper. [District Rule 4606] Federally Enforceable Through Title V Permit
16. Permittee shall keep the following records for solvent cleaning activities: manufacturers product data sheet or MSDS of solvents used, VOC content of solvents in g/l or lb/gal, and the type of cleaning activity for which each solvent is used. [District Rule 4606] Federally Enforceable Through Title V Permit
17. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4606] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

FACILITY: C-954-0-1

EXPIRATION DATE: 08/31/2011

## FACILITY-WIDE REQUIREMENTS

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1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (3/21/02). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.12.1] Federally Enforceable Through Title V Permit
6. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
9. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name: PRISON INDUSTRY AUTHORITY--AVENAL  
Location: 1 KINGS WAY, AVENAL, CA 93204  
C-954-0-1 : Oct 4 2012 1:12PM -- GONZALEV

10. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
13. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit
22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (11/15/01). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

23. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in the Table of Standards of District Rule 4601 (10/31/01) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. All VOC-containing materials for architectural coatings subject to Rule 4601 (10/31/01) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (10/31/01). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR 82, Subpart B. [40 CFR 82, Subpart B] Federally Enforceable Through Title V Permit
29. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8021 and 8011] Federally Enforceable Through Title V Permit
30. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (11/15/01) or Rule 8011 (11/15/01); [District Rule 8031 and 8011] Federally Enforceable Through Title V Permit
31. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8041 and 8011] Federally Enforceable Through Title V Permit
32. Whenever open areas are disturbed or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8051 and 8011] Federally Enforceable Through Title V Permit
33. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8061 and Rule 8011] Federally Enforceable Through Title V Permit
34. Any unpaved vehicle/equipment area that anticipates more than 75 vehicle trips per day shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 100 vehicle trips per day shall comply with the requirements of Section 5.1.2 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8071 and Rule 8011] Federally Enforceable Through Title V Permit
35. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), and Rule 111 (Kern, Tulare, Kings). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (11/15/01); 4601, sections 5.1, 5.2, 5.3, 5.8 and 8.0 (10/31/01); 8021 (11/15/01); 8031 (11/15/01); 8041 (11/15/01); 8051 (11/15/01); 8061 (11/15/01); and 8071 (11/15/01). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
42. On March 31, 2007, the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report are based upon this initial permit issuance date, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-954-3-3

**EXPIRATION DATE:** 08/31/2011

## **EQUIPMENT DESCRIPTION:**

WOOD FURNITURE FACTORY LOCATED IN BLDG #290 WITH WOODWORKING OPERATION CONSISTING OF 4 TABLE SAWS, 1 CHOP SAW, 1 BAND SAW, 1 PANEL SAW, 1 CNC PANEL SAW, 1 CNC SAW, 5 SANDERS, 2 SHAPERS, 1 CLEANER, 1 PLANER, 1 EDGE BANDER, 3 CNC ROUTERS, 1 PIN ROUTER, 2 DRAWER DOVETAILER AND OTHER RELATED EQUIPMENTS, ALL SERVED BY AN R.P. RICHARDS MODEL 12-216-3464 BAGHOUSE DUST COLLECTOR WITH REVERSE PULSED-JET CLEANING SYSTEM

## **PERMIT UNIT REQUIREMENTS**

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1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
5. Visible emissions from the exhaust of the dust collector serving the woodworking operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]
6. The PM10 emissions from the dust collector shall not exceed 1.1 lb/day. [District Rule 2201]
7. All ducting and control equipment shall be in good working order to prevent fugitive particulate emissions. [District Rule 2201]
8. All filters shall be properly maintained and must be in place during the woodworking operation(s). [District Rule 2201]
9. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201]
10. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201]
11. The baghouse shall operate at all times with a minimum differential pressure of 0.5 inches water column and a maximum differential pressure of 4 inches water column. [District Rule 2201]
12. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201]
13. Dust collector exhaust fan(s) shall be switched on prior to the start-up of any woodworking equipment. [District Rule 2201]
14. Replacement bags numbering at least 10% of the total number of bags in the baghouse shall be maintained on the premises. [District Rule 2201]
15. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

16. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter breakthrough and shall be replaced as needed. [District Rule 2201]
17. Records of dust collector maintenance, inspections, and repairs including all change outs of filter media, shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2201]
18. Records of the daily differential operating pressure readings shall be retained on-site. [District Rule 2201]
19. Records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 2201]

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-954-4-6

**EXPIRATION DATE:** 08/31/2011

**EQUIPMENT DESCRIPTION:**

POWDER COATING OPERATION CONSISTING OF POWDER COATING BOOTH, 1.8 MMBTU/HR DRY-OFF OVEN, 3.3 MMBTU/HR BAKE OVEN AND 0.34 MMBTU/HR CONTROLLED PYROLYSIS FURNACE WITH INTEGRAL AFTERBURNER FOR PARTS HANGER CLEANING

## PERMIT UNIT REQUIREMENTS

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1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. Only PUC-regulated natural gas shall be used as fuel for the ovens and Controlled Pyrolysis burn-off furnace. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Emissions from the Controlled Pyrolysis burn-off furnace shall not exceed any of the following limits: 0.0271 lb-NOx/hr, 0.05 lb-CO/hr, 0.0174 lb-VOC/hr, 0.0133 lb-PM10, and 0.0018 lb-SOx/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Emissions from the natural gas-fired ovens shall not exceed any of the following limits: 0.1 lb-NOx/MMBtu, 0.084 lb-CO/MMBtu, 0.0076 lb-PM10/MMBtu, 0.0055 lb-VOC/MMBtu, and 0.0006 lb-SOx/MMBtu. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Daily usage of powder coating shall not exceed 600 pounds. [District NSR Rule] Federally Enforceable Through Title V Permit
7. All coating shall be conducted in booth with filters in place and fan(s) operating. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Only electrostatic application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Powder coating material shall not contain VOC's. Manufacturer's Material Safety Data Sheets may be used to confirm the VOC content of the powder coating. [District NSR Rule and District Rule 4603] Federally Enforceable Through Title V Permit
10. Permittee shall maintain daily records of number of pounds of powder coating used. [District Rule 1070] Federally Enforceable Through Title V Permit
11. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
12. Operator shall maintain copies of fuel invoices. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
13. Visible emissions from the dust collector shall be checked annually. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-954-10-2

**EXPIRATION DATE:** 08/31/2011

**EQUIPMENT DESCRIPTION:**

POWDER COATING OPERATION WITH ELECTROSTATIC APPLICATION EQUIPMENT, BOOTH WITH DRY FILTERS AND 0.75 MMBTU/HR NATURAL GAS-FIRED BATCH CURING OVEN

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Only PUC-regulated natural gas shall be used as fuel for the oven. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Daily usage of powder coating shall not exceed 319 pounds. [District NSR Rule] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
5. All coating shall be conducted in booth with filters in place and fan(s) operating. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Only electrostatic application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Powder coating material shall not contain VOC's. Manufacturer's Material Safety Data Sheets may be used to confirm the VOC content of the powder coating. [District NSR Rule and District Rule 4603] Federally Enforceable Through Title V Permit
8. Permittee shall maintain daily records of number of pounds of powder coating used. [District Rule 1070] Federally Enforceable Through Title V Permit
9. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
10. NOx emissions from the natural gas-fired oven shall not exceed 0.1 lb-NOx/MMBtu. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Operator shall maintain copies of fuel invoices. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
12. Visible emissions from the dust collector shall be checked annually. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-954-12-1

**EXPIRATION DATE:** 08/31/2011

**EQUIPMENT DESCRIPTION:**

1,250 HP CATERPILLAR MODEL 3412 STA DIESEL-FIRED EMERGENCY IC ENGINE POWERING A 800 KW ELECTRICAL GENERATOR.

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. This engine shall be equipped with a positive crankcase ventilation (PCV) system that recirculates crankcase emissions into the air intake system for combustion. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap, roof overhang, or any other obstruction. [District Rule 4102]
4. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
5. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District NSR Rule and District Rule 4801 and 17 CCR 93115] Federally Enforceable Through Title V Permit
6. NOx Emissions shall not exceed 5.91 g/hp-hr. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The PM10 emissions rate shall not exceed 0.14 g/hp-hr. [District NSR Rule] Federally Enforceable Through Title V Permit
8. This engine shall be operated only for maintenance, testing, and required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 50 hours per calendar year. [District Rules 4701 and 4702, and 17 CCR 93115] Federally Enforceable Through Title V Permit
9. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702] Federally Enforceable Through Title V Permit
10. During periods of maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (e.g. oil pressure, exhaust gas temperature, etc.). [District Rule 4702] Federally Enforceable Through Title V Permit
11. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, and the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.). For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rules 4702, 6.2 and 2520, 9.4.2 and 17 CCR 93115] Federally Enforceable Through Title V Permit
12. The permittee shall maintain monthly records of the type of fuel purchased, the amount of fuel purchased, date when the fuel was purchased, signature of the permittee who received the fuel, and signature of the fuel supplier indicating that the fuel was delivered. [District Rule 2520, 9.4.2 and 17 CCR 93115] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

13. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 4702, 6.2 and 2520, 9.4.2 and 17 CCR 93115] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-954-14-1

**EXPIRATION DATE:** 08/31/2011

**EQUIPMENT DESCRIPTION:**

CHAIR MANUFACTURING AND FINISHING BUILDING #290 WITH A NEW CONVEYORIZED UV COATING LINE CONSISTING OF AN INCLINED UV CURING SYSTEM, A BELT CONVEYOR, A ROTARY SANDING/DENIBBING MACHINE, A RECIPROCATING SPRAY MACHINE, A PANEL BRUSHING MACHINE, A BELT CONVEYOR FOR HAND SANDING, A BELT CONVEYOR FOR HAND WIPING, AND A MULTI-LEVEL FLASH-OFF OVEN SYSTEM (ELECTRIC OVEN) EXHAUSTED THROUGH DANTherm MODEL CS-3-M BAGHOUSE INCLUDING A 40 HP BLOWER AND FILTRATION UNIT

## PERMIT UNIT REQUIREMENTS

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1. The combined weekly emissions from equipment operated under permits C-954-1, C-954-2 and C-953-14 shall not exceed 224 lb-VOC and 9.1 lb-PM10. [District Rule 2201] Federally Enforceable Through Title V Permit
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
3. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. Visible emissions from the exhaust of the dust collector serving the woodworking operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
5. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
6. All painting applications shall be conducted inside the booth with filters in place, fan(s) operating, and doors closed. [District Rule 2201] Federally Enforceable Through Title V Permit
7. PM10 emissions from the dust collector shall not exceed 0.004 gr/dscf. [District Rules 2201 and 4201] Federally Enforceable Through Title V Permit
8. The daily emissions from this operation shall not exceed 0.3 lb-VOC/day and 21.9 lb-PM10/day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: clear topcoat 275 g/l (2.3 lb/gallon), filler 275 g/l (2.3 lb/gallon), high-solids stains 240 g/l (2.0 lb/gallon), ink 500 g/l (4.2 lb/gallon), mold-seal coating 750 g/l (6.3 lb/gallon), multi-colored coating 275 g/l (2.3 lb/gallon), pigmented coating 275 g/l (2.3 lb/gallon), sanding sealer 275 g/l (2.3 lb/gallon). [District Rules 2201 and 4606] Federally Enforceable Through Title V Permit
10. VOC content of coatings as applied, used for wood product, shall not exceed any of the following limits: low-solids stain 120 g/l (1.0 lb/gallon), stripper 350 g/l (2.9 lb/gallon). [District Rules 2201 and 4606] Federally Enforceable Through Title V Permit
11. VOC content of strippable booth coating shall not exceed 450 g/l (3.8 lb/gallon) as applied, excluding water and exempt compounds. [District Rule 4606] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

12. Only HVLP, electrostatic, brush, dip, flow, or roll coating application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4606] Federally Enforceable Through Title V Permit
13. Permittee shall demonstrate that HVLP guns manufactured prior to 1/1/96 operate between 0.1 and 10 psig air atomizing pressure, by manufacturer's published technical material or by use of a certified air pressure tip gauge. [District Rule 4606] Federally Enforceable Through Title V Permit
14. All fresh or spent coatings, adhesives, catalysts, thinners and solvents shall be stored in closed containers. Solvent laden cloth or paper shall be stored and disposed in closed non-absorbent containers. [District Rule 4606] Federally Enforceable Through Title V Permit
15. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal), repair and maintenance cleaning: 25 g/l (0.21 lb/gal), and cleaning of coating application equipment: 25 g/l (0.21 lb/gal). [District Rule 4606] Federally Enforceable Through Title V Permit
16. Permittee shall not use cleaning material with a VOC content greater than 25 g/l (0.21 lb/gallon) for all solvent cleaning operations unless such cleaning operations are carried out within an APCO-approved emission control system. [District Rule 4606] Federally Enforceable Through Title V Permit
17. An operator shall store or dispose of fresh or spent solvents, waste solvent cleaning material such as cloth, paper, etc, coating, adhesives, catalysts, and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4606] Federally Enforceable Through Title V Permit
18. Records of all maintenance of the dust collector, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Permittee shall maintain daily records of the following: quantity and type of coatings and solvents used, mix ratios (by volume) of components added to each coating, volume of coatings applied, VOC content of each coating as applied, and VOC content of each solvent or stripper. [District Rule 4606] Federally Enforceable Through Title V Permit
20. Permittee shall keep the following records for solvent cleaning activities: manufacturers product data sheet or MSDS of solvents used, VOC content of solvents in g/l or lb/gal, and the type of cleaning activity for which each solvent is used. [District Rule 4606] Federally Enforceable Through Title V Permit
21. Each container or accompanying data sheet of any coating subject to this rule shall display the maximum VOC content of the coating, as applied after any thinning as recommended by the manufacturer. VOC content shall be displayed as grams of VOC per liter (or pounds of VOC per gallon) of coating, less water and exempt compounds. VOC content displayed may be calculated using product formulation data, or may be determined using the test method in District Rule 4606, Section 6.8. [District Rule 4606] Federally Enforceable Through Title V Permit
22. Each container or accompanying data sheet of any coating subject to this rule shall display the manufacturer's recommendation regarding thinning of the coating. This requirement shall not apply to the thinning of coatings with water. [District Rule 4606] Federally Enforceable Through Title V Permit
23. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4606] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

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# ATTACHMENT C

Detailed Facility List

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**Detailed Facility Report**  
For Facility=954 and excluding Deleted Permits  
Sorted by Facility Name and Permit Number

<b>PRISON INDUSTRY AUTHORITY--AVENAL</b> <b>1 KINGS WAY</b> <b>AVENAL, CA 93204</b>	FAC # STATUS: TELEPHONE:	<b>C 954</b> <b>A</b>	TYPE: TOXIC ID:	<b>TitleV</b>	EXPIRE ON: AREA: INSP. DATE:	<b>08/31/2011</b> <b>10 /</b> <b>07/13</b>
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PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
C-954-1-6	7.5 HP ELECTRIC MOTOR RATING	3020-01 A	1	87.00	87.00	A	WOOD PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN, BINKS MODEL PFF-16-10-T-LH SPRAY PAINT BOOTH WITH EXHAUST FILTERS, AND VERID GUNWASHER MODEL 200-1 (COMMON WITH C-954-2)
C-954-2-6	7.5 HP ELECTRIC MOTOR RATING	3020-01 A	1	87.00	87.00	A	WOOD PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN, BINKS MODEL PFF-16-10-T-LH SPRAY PAINT BOOTH WITH EXHAUST FILTERS AND VERID GUNWASHER MODEL 200-1 (COMMON WITH C-954-1) AND LOCATED IN BLDG #290, FURNITURE FACTORY
C-954-3-3	519.3 hp	3020-01 F	1	607.00	607.00	A	WOOD FURNITURE FACTORY LOCATED IN BLDG #290 WITH WOODWORKING OPERATION CONSISTING OF 4 TABLE SAWS, 1 CHOP SAW, 1 BAND SAW, 1 PANEL SAW, 1 CNC PANEL SAW, 1 CNC SAW, 5 SANDERS, 2 SHAPERS, 1 CLEANER, 1 PLANER, 1 EDGE BANDER, 3 CNC ROUTERS, 1 PIN ROUTER, 2 DRAWER DOVETAILER AND OTHER RELATED EQUIPMENTS, ALL SERVED BY AN R.P. RICHARDS MODEL 12-216-3464 BAGHOUSE DUST COLLECTOR WITH REVERSE PULSED-JET CLEANING SYSTEM
C-954-4-6	5,440 KBtu/hr heat input	3020-02 G	1	815.00	815.00	A	POWDER COATING OPERATION CONSISTING OF POWDER COATING BOOTH, 1.8 MMBTU/HR DRY-OFF OVEN, 3.3 MMBTU/HR BAKE OVEN AND 0.34 MMBTU/HR CONTROLLED PYROLYSIS FURNACE WITH INTEGRAL AFTERBURNER FOR PARTS HANGER CLEANING
C-954-10-2	0.75 MMBTU/HR	3020-02 D	1	314.00	314.00	A	POWDER COATING OPERATION WITH ELECTROSTATIC APPLICATION EQUIPMENT, BOOTH WITH DRY FILTERS AND 0.75 MMBTU/HR NATURAL GAS-FIRED BATCH CURING OVEN
C-954-12-1	1,250 BHP DIESEL-FIRED IC ENGINE	3020-10 F	1	749.00	749.00	A	1,250 HP CATERPILLAR MODEL 3412 STA DIESEL-FIRED EMERGENCY IC ENGINE POWERING A 800 KW ELECTRICAL GENERATOR.
C-954-14-1	270 electric hp	3020-01 E	1	412.00	412.00	A	CHAIR MANUFACTURING AND FINISHING BUILDING #290 WITH A NEW CONVEYORIZED UV COATING LINE CONSISTING OF AN INCLINED UV CURING SYSTEM, A BELT CONVEYOR, A ROTARY SANDING/DENIBBING MACHINE, A RECIPROCATING SPRAY MACHINE, A PANEL BRUSHING MACHINE, A BELT CONVEYOR FOR HAND SANDING, A BELT CONVEYOR FOR HAND WIPING, AND A MULTI-LEVEL FLASH-OFF OVEN SYSTEM (ELECTRIC OVEN) EXHAUSTED THROUGH DANTHERM MODEL CS-3-M BAGHOUSE INCLUDING A 40 HP BLOWER AND FILTRATION UNIT

Number of Facilities Reported: 1