

**YOLO-SOLANO AIR QUALITY MANAGEMENT DISTRICT**  
**1947 Galileo Court, Suite 103, Davis, CA 95618**  
**(530)757-3650**

**TITLE V PERMIT STATEMENT OF BASIS**  
**ADDENDUM**

PERMIT NUMBER: F-00555-4

ENGINEER: Kyle Rohlfing

DATE: October 21, 2010

**Facility Name:** California State Prison-Solano  
**Mailing Address:** 2100 Peabody Road  
Vacaville, CA 95696-4000

**Location:** 2100 Peabody Road  
Vacaville, CA 95696-4000

**Responsible Official:** Wayne Houston  
**Title:** Correctional Plant Manager II

**Application Contact:** Alan Carone  
**Phone:** (707) 454-3287

**I. FACILITY DESCRIPTION**

The California State Prison at Solano (CSP) is a correctional detention center for convicted male felons. As part of the prison program, the Prison Industry Authority (PIA) provides vocational work programs for the inmates. Support operations include emergency power generation, graphic arts printing, abrasive blasting, metal parts and products coating, automotive coating, woodworking operations, and wood products coating.

**II. PROPOSED REVISIONS**

The facility is currently operating under Title V Operating Permit F-00555-0, effective October 19, 2005. This addendum to the original Title V Statement of Basis reflects only the Title V Permit modifications proposed by Authority to Construct (ATC) application C-10-30 for the modification of an automotive coating operation currently operating under Permit to Operate P-53-88 to apply additional categories of coatings. As part of this modification the permit process limits will be changed from the amount of coatings applied to the current District standard of weight of Volatile Organic Compound (VOC) emissions from coatings and solvents used. Any emission units not affected by the proposed changes were evaluated in the original Statement of Basis or previous addendums (including the Title V permit modifications evaluated in Title V permit Statement of Basis Addendums F-00555-1, F-00555-2, and F-00555-3), and will not be included in this document.

**III. Significant Emissions Unit Information**

The operation being modified has been processed pursuant to the issuance of an authority to construct and in accordance with District Rules 3.1 and 3.4.

**Identification Number:** P-53-88(a), Coating Operation: Automotive

**Equipment Description:** 52'6" x 15' x 16' paint spray booth, HVLP gun(s), and 0.4 MMBtu/hr permit exempt natural gas fired heater

**Control Equipment:** Exhaust fan (10,000 CFM) with dry filter system

**IV. Title V Applicability**

As regulated by the US Environmental Protection Agency (EPA); CSP, PIA, and the California Medical Facility (CMF) are considered all to be part of one Federal Major Source. Although the combined potential to emit for CSP and PIA alone do not exceed the Title V thresholds for any of the criteria pollutants, the facilities are subject to the requirements of District Rule 3.8 because the potential to emit for all three facilities combined exceed the major source thresholds for volatile organic compounds (VOC) and nitrogen oxides (NO<sub>x</sub>) of 25 tons per year each.

Because of the facility's organizational structure CSP and PIA operate under Title V permit F-00555-0, while CMF has been issued a separate Title V permit (F-00072-5) effective August 16, 2010.

The CSP and PIA combined facility emission totals are listed below:

| Criteria Pollutant Emissions (tons per year) |      |      |                 |                 |                  |
|--|------|------|-----------------|-----------------|------------------|
| Permit                                       | VOC  | CO   | NO <sub>x</sub> | SO <sub>x</sub> | PM <sub>10</sub> |
| P-41-88(a1) *                                | 2.15 | 0.70 | 0.83            | -               | 0.65             |
| P-22-04(a) *                                 | 1.20 | -    | -               | -               | 0.40             |
| P-42-88                                      | -    | -    | -               | -               | 0.01             |
| P-53-88(a)                                   | 2.17 | -    | -               | -               | 0.28             |
| P-3-90                                       | 0.52 | -    | -               | -               | -                |
| P-35-92                                      | -    | -    | -               | -               | 0.25             |
| P-36-92                                      | -    | -    | -               | -               | 0.28             |
| P-77-92(a)                                   | 0.24 | -    | -               | -               | -                |

|              |              |             |             |             |             |
|--------------|--------------|-------------|-------------|-------------|-------------|
| P-27-95      | 0.01         | 0.03        | 0.13        | -           | 0.01        |
| P-28-95      | 0.01         | 0.03        | 0.13        | -           | 0.01        |
| P-29-95      | 0.01         | 0.03        | 0.13        | -           | 0.01        |
| P-30-95      | 0.01         | 0.03        | 0.13        | -           | 0.01        |
| P-31-95      | 0.01         | 0.02        | 0.11        | -           | 0.01        |
| P-133-95     | 5.23         | -           | -           | -           | 0.71        |
| P-167-95     | 0.46         | -           | -           | -           | 0.02        |
| P-55-97      | 0.06         | 0.23        | 1.11        | 0.01        | 0.13        |
| P-64-04      | 0.01         | 0.04        | 0.40        | -           | 0.01        |
| P-51-10      | 0.04         | 0.03        | 0.14        | -           | 0.01        |
| <b>Total</b> | <b>12.13</b> | <b>1.14</b> | <b>3.11</b> | <b>0.01</b> | <b>2.81</b> |

\* Only P-41-88(a1) includes emissions from combustion of natural gas that is capped for P-41-88(a1) and P-22-04(a) combined.

**V. APPLICABLE FEDERAL REQUIREMENTS**

**RULE 2.3 Ringelmann Chart**

**Rule Description**

This rule specifies the allowable opacity limit for visible emissions sources in the District.

**Compliance Status**

The rule applies to all emission units at the stationary source. The source is currently in compliance with the rule.

**Rule Requirement #1**

Rule 2.3 reads:

*"A person shall not discharge into the atmosphere from any single source of emission whatsoever, any air contaminant for a period or periods aggregating more than 3 minutes in any one hour which is:*

- a. As dark or darker in shade as that designated as No. 2 on the Ringelmann Chart, as published by the United States Bureau of Mines; or*
- b. Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subsection a. of this rule."*

**Subsuming Demonstration:** The District has revised District Rule 2.3 and is taking steps to include the revised rule in the California State Implementation Plan (SIP). Until the revised rule is included in the plan, the requirements of the current SIP rule can be subsumed by the authority of District Rule 3.4, New Source Review.

The automotive coating operation of P-53-88(a) is subject to a 20% opacity limitation on visible emissions based on the authority of District Rule 3.4 which constitutes a federally enforceable requirement which is more stringent than the requirement of Rule 2.3. Therefore, the Rule 2.3 requirement can be subsumed by the Rule 3.4 requirement.

**Subsuming Permit Condition**

The permit holder shall not discharge into the atmosphere from any single source of emission whatsoever, any air contaminant for a period or periods aggregating more than three (3) minutes in any one hour which is:

- a. As dark or darker in shade as that designated as No. 1 on the Ringelmann Chart; or
- b. Greater than 20% opacity. [District Rule 3.4]

**RULE 2.5 Nuisance**

**Rule Description**

\_\_\_\_\_ This rule requires that sources are not a public nuisance.

**Compliance Status**

The rule applies to all emission units at the stationary source. The source is currently in compliance with the rule.

**Permit Condition**

The permit holder shall not discharge from any source whatsoever, such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health, or safety of any such persons or the public or which cause to have a natural tendency to cause injury or damage to business or property.

**RULE 2.11 Particulate Matter**

**Rule Description**

\_\_\_\_\_ This rule specifies the allowable particulate matter (PM) emission rate at standard conditions. For the purpose of this evaluation, the PM emissions are considered to be 100% PM<sub>10</sub> (PM with an aerodynamic diameter of 10 microns or less).

### **Compliance Status**

The rule applies to the automotive coating operation of P-53-88(a). The source is currently in compliance with this rule.

### **Rule Requirement #1**

Rule 2.11 reads:

*"Except as otherwise permitted by law, no person shall release or discharge into the atmosphere, from any source, particulate matter in excess of 0.3 grains per cubic foot of exhaust volume as calculated standard conditions."*

**Subsuming Demonstration:** The District has revised District Rule 2.11 and is taking steps to include the revised rule in the California SIP. Until the revised rule is included in the plan, the requirements of the current SIP rule can be subsumed by the authority of District Rule 3.4, New Source Review.

The District Rule 3.4 requirement in P-53-88(a) is 2.3 lb/day of particulate matter. The maximum particulate matter in the exhaust is calculated below using the booth filter fan calculated exhaust flow of 10,000 cubic feet per minute (cfm) and conservatively assuming:

$$= 2.3 \text{ lb/day} * \text{day}/24\text{hour} * 7000 \text{ grains/lb} * \text{hour}/60\text{min} * \text{min}/10,000 \text{ dscf} = 0.001 \text{ grains/dscf}$$

The maximum rate of particulate matter emission calculated under the authority of District Rule 3.4 constitutes a federally enforceable requirement which is more stringent than the requirement of Rule 2.11. Therefore, the Rule 2.3 requirement can be subsumed by the Rule 3.4 requirement.

### **Subsuming Permit Condition**

The permit holder shall not release or discharge into the atmosphere, from any source, particulate matter in excess of 0.001 grains per cubic foot of exhaust volume as calculated at standard conditions.

## **RULE 2.17 Circumvention**

### **Rule Description**

This rule prevents sources from concealing emissions to the atmosphere.

### **Compliance Status**

The rule is applicable to all emission units at the facility. The source is currently in compliance with the rule.

**Permit Condition**

The permit holder shall not build, erect, install or use any article, machine, equipment, or other contrivance, the use of which, without resulting in a reduction in the total release of air contaminants to the atmosphere, reduces or conceals an emission which would otherwise constitute a violation of Division 26, Part 3 and Part 4 of the Health and Safety Code of the State of California or District Rules or Regulations. [District Rule 2.17]

**RULE 2.26 Motor Vehicle and Mobile Equipment Coating Operations**

**Rule Description**

The purpose of this rule is to limit the emission of VOCs from coating operations associated with motor vehicles, mobile equipment, and associated parts and components.

**Compliance Status**

The rule applies to the automotive coating operation of P-53-88(a). The version of the rule used in this evaluation is the rule that was adopted on April 27, 1994, and is part of the California SIP. The source is currently in compliance with the rule.

**Rule Requirement #1 - Coating VOC Content Limits**

Section 301 of the rule reads:

*"LIMITS: Any person who applies coatings to Group I or II vehicles, mobile equipment, their parts and components, shall comply with Sections 301.1, 301.2, and 302 of this rule.*

*301.1 Group I Vehicles. A person shall not refinish Group I vehicles, their parts and components, or Group II vehicles and mobile equipment where color match is required, using any coating with a VOC content in excess of the following limits, expressed as grams of VOC per liter (or pounds per gallon) of coating applied, excluding water and exempt compounds (as defined in Section 207 of this Rule), unless emissions to the atmosphere are controlled to an equivalent level by air pollution abatement equipment with an abatement device efficiency of at least 85 percent.*

| <b>COATING</b>                     | <b>JANUARY 1, 1995<br/>VOC</b> |
|------------------------------------|--------------------------------|
| <i>Pretreatment Wash Primer</i>    | <i>420 g/l (3.5 lbs/gal)</i>   |
| <i>Precoat</i>                     | <i>420 g/l (3.5 lbs/gal)</i>   |
| <i>Primer/Primer surfacer</i>      | <i>250 g/l (2.1 lbs/gal)</i>   |
| <i>Primer Sealer</i>               | <i>340 g/l (2.8 lbs/gal)</i>   |
| <i>Topcoat</i>                     | <i>460 g/l (3.8 lbs/gal)</i>   |
| <i>Metallic/Iridescent Topcoat</i> | <i>540 g/l (4.5 lbs/gal)</i>   |
| <i>Specialty Coating</i>           | <i>840 g/l (7.0 lbs/gal)</i>   |

**301.2 Group II Vehicles and Mobile Equipment.** *A person shall not finish or refinish Group II vehicles and equipment or their parts and components where color match is not required, using any coating with a VOC content in excess of the following limits, expressed as grams of VOC per liter (or pounds per gallon) of coating applied, excluding water and exempt compounds (as defined in Section 207 of this Rule), unless emissions to the atmosphere are controlled to an equivalent level by air pollution abatement equipment with an abatement device efficiency of at least 85 percent."*

| COATING                     | JANUARY 1, 1995<br>VOC |
|-----------------------------|------------------------|
| Pretreatment Wash Primer    | 420 g/l (3.5 lbs/gal)  |
| Precoat                     | 420 g/l (3.5 lbs/gal)  |
| Primer                      | 250 g/l (2.1 lbs/gal)  |
| Topcoat                     | 340 g/l (2.8 lbs/gal)  |
| Metallic/Iridescent Topcoat | 420 g/l (3.5 lbs/gal)  |
| Extreme Performance         | 420 g/l (3.5 lbs/gal)  |
| Camouflage                  | 420 g/l (3.5 lbs/gal)  |
| Specialty Coating           | 840 g/l (7.0 lbs/gal)  |

**Subsuming Demonstration:** The District has revised District Rule 2.26 and is taking steps to include the revised rule in the California SIP. Until the revised rule is included in the plan, the requirements of the current SIP rule can be subsumed by the authority of District Rule 3.4, New Source Review.

The automotive coating operation is subject to other federally enforceable coating VOC content restriction requirements based on the authority of District Rule 3.4 which are more stringent, and therefore, this Rule 2.26 requirement can be subsumed by the Rule 3.4 requirement.

**Subsuming Permit Condition**

No person shall apply to any motor vehicle, mobile equipment, or associated parts and components, any coating with a VOC regulatory content, as calculated pursuant to section 605, in excess of the following limits:

| COATING CATEGORY     | REGULATORY VOC<br>CONTENT<br>grams/liter (pounds/gallon) |
|----------------------|--|
| Adhesion Promoter    | 540 (4.5)  |
| Clear Coating        | 250 (2.1)  |
| Color Coating        | 420 (3.5)  |
| Multi-Color Coating  | 680 (5.7)  |
| Pretreatment Coating | 660 (5.5)  |

|                              |           |
|------------------------------|-----------|
| Primer                       | 250 (2.1) |
| Primer Sealer                | 250 (2.1) |
| Single-Stage Coating         | 340 (2.8) |
| Temporary Protective Coating | 60 (0.5)  |
| Truck Bed Liner Coating      | 310 (2.6) |
| Underbody Coating            | 430 (3.6) |
| Uniform Finish Coating       | 540 (4.5) |
| Any Other Coating Type       | 250 (2.1) |

[District Rule 2.26, §302 and District Rule 3.4]

**Rule Requirement #2** - Most Restrictive VOC Content Limit

Section 301 of the rule reads:

**"LIMITS:** Any person who applies coatings to Group I or II vehicles, mobile equipment, their parts and components, shall comply with Sections 301.1, 301.2, and 302 of this rule.

**301.1 Group I Vehicles.** A person shall not refinish Group I vehicles, their parts and components, or Group II vehicles and mobile equipment where color match is required, using any coating with a VOC content in excess of the following limits, expressed as grams of VOC per liter (or pounds per gallon) of coating applied, excluding water and exempt compounds (as defined in Section 207 of this Rule), unless emissions to the atmosphere are controlled to an equivalent level by air pollution abatement equipment with an abatement device efficiency of at least 85 percent.

| COATING                     | JANUARY 1, 1995<br>VOC |
|-----------------------------|------------------------|
| Pretreatment Wash Primer    | 420 g/l (3.5 lbs/gal)  |
| Precoat                     | 420 g/l (3.5 lbs/gal)  |
| Primer/Primer surfacer      | 250 g/l (2.1 lbs/gal)  |
| Primer Sealer               | 340 g/l (2.8 lbs/gal)  |
| Topcoat                     | 460 g/l (3.8 lbs/gal)  |
| Metallic/Iridescent Topcoat | 540 g/l (4.5 lbs/gal)  |
| Specialty Coating           | 840 g/l (7.0 lbs/gal)  |

**301.2 Group II Vehicles and Mobile Equipment.** A person shall not finish or refinish Group II vehicles and equipment or their parts and components where color match is not required, using any coating with a VOC content in excess of the following limits, expressed as grams of VOC per liter (or pounds per gallon) of coating applied, excluding water and exempt compounds (as defined in Section 207 of this Rule), unless emissions to the atmosphere are controlled to an equivalent level by air pollution abatement equipment with an abatement device efficiency of at least 85 percent."

| COATING                     | JANUARY 1, 1995<br>VOC |
|-----------------------------|------------------------|
| Pretreatment Wash Primer    | 420 g/l (3.5 lbs/gal)  |
| Precoat                     | 420 g/l (3.5 lbs/gal)  |
| Primer                      | 250 g/l (2.1 lbs/gal)  |
| Topcoat                     | 340 g/l (2.8 lbs/gal)  |
| Metallic/Iridescent Topcoat | 420 g/l (3.5 lbs/gal)  |
| Extreme Performance         | 420 g/l (3.5 lbs/gal)  |
| Camouflage                  | 420 g/l (3.5 lbs/gal)  |
| Specialty Coating           | 840 g/l (7.0 lbs/gal)  |

**Subsuming Demonstration:** The District has revised District Rule 2.26 and is taking steps to include the revised rule in the California SIP. Until the revised rule is included in the plan, the requirements of the current SIP rule can be subsumed by the authority of District Rule 3.4, New Source Review.

The automotive coating operation is subject to other federally enforceable coating VOC content restriction requirements based on the authority of District Rule 3.4 which are more stringent, and therefore, this Rule 2.26 requirement can be subsumed by the Rule 3.4 requirement.

**Subsuming Permit Condition**

If anywhere on the container of any automotive coating, or any label or sticker affixed to the container, or in any sales, advertising, or technical literature, any representation is made that indicates that the coating meets the definition of or is recommended for use for more than one of the coating categories listed above, then the lowest VOC content limit shall apply. [District Rule 2.26, §303 and District Rule 3.4]

**Rule Requirement #3 - Coating Application Methods**

Section 303 of the rule reads:

*“Effective six months from April 27, 1994 for all coatings, a person shall not apply any coating to any Group I or II vehicles or mobile equipment or their parts and components unless one of the following methods is used:*

*303.1 Electrostatic application equipment, operated in accordance with the manufacturer's recommendations;*

*303.2 High Volume Low Pressure (HVLP) spray equipment, operated in accordance with the manufacturer's recommendations;*

*303.3 Any other coating application method which has been demonstrated to have a transfer efficiency of 65% or greater.”*

**Subsuming Demonstration:** The District has revised District Rule 2.26 and is taking steps to include the revised rule in the California SIP. Until the revised rule is

included in the plan, the requirements of the current SIP rule can be subsumed by the authority of District Rule 3.4, New Source Review.

The automotive coating operation is subject to other federally enforceable coating application requirements based on the authority of District Rule 3.4 which are more stringent, and therefore, this Rule 2.26 requirement can be subsumed by the Rule 3.4 requirement.

**Subsuming Permit Condition**

The Permit Holder shall not apply any coating to any motor vehicle, mobile equipment, or associated parts and components by any method other than high volume low pressure (HVLP) spray equipment, unless such equipment has written approval from the District. [District Rule 2.26, §304 and District Rule 3.4]

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**Rule Requirement #4** - Toxic Air Contaminants

The version of Rule 2.26 in the California SIP does not contain any limitation on the content of toxic air contaminants in the various coating categories.

**Subsuming Demonstration:** The District has revised District Rule 2.26 and is taking steps to include the revised rule in the California SIP. Until the revised rule is included in the plan, the requirements of the current SIP rule can be subsumed by the authority of District Rule 3.4, New Source Review.

The automotive coating operation is subject to an additional federally enforceable coating content restriction based on the authority of District Rule 3.4. Because this additional coating content restriction is an additional content restriction in addition to the VOC content restrictions of the SIP approved rule, the Rule 2.26 requirements can be subsumed by the Rule 3.4 requirement.

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**Subsuming Permit Condition**

The Permit Holder shall not use or possess any automotive coatings containing hexavalent chromium or cadmium. [District Rule 2.26, §308 and District Rule 3.4]

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**Rule Requirement #5** - Storage and Disposal

Sections 304.2 and 304.3 of the rule read:

*“304.2 A person shall use closed, nonabsorbent containers for the storage and disposal of cloth or paper used for solvent surface preparation and cleanup.*

*304.3 A person shall store fresh or spent solvent in closed containers.”*

**Subsuming Demonstration:** The District has revised District Rules 2.26 and 2.31 and is taking steps to include the revised rules in the California SIP. Until the revised rules are included in the plan, the requirements of the current SIP rules can be subsumed by the authority of District Rule 3.4, New Source Review.

The automotive coating operation is subject to other federally enforceable storage and disposal requirements based on the authority of District Rule 3.4 which are more stringent, and therefore, the Rule 2.26 and 2.31 requirements can be subsumed by the Rule 3.4 requirement.

#### **Subsuming Permit Condition**

The Permit Holder shall use closed containers for the storage or disposal of cloth, paper, or other VOC containing materials (including paint, thinners, catalysts, reducers, solvent and spent solvent used for surface preparation, clean-up, and coating applications). [District Rule 2.26, §306, District Rule 2.31, §308 and District Rule 3.4]

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#### **Rule Requirement #6** - Coating Specifications

Section 507.2 of the rule reads:

- "507.2 The person shall maintain and have available during an inspection, a current list of coatings in use which provides all the coating data necessary to evaluate compliance, including the following information, as applicable:*
- a. Coating, catalyst, additives, and reducer used.*
  - b. Mix ratio of components used.*
  - c. VOC content of coating as applied."*

**Subsuming Demonstration:** The District has revised District Rule 2.26 and is taking steps to include the revised rule in the California SIP. Until the revised rule is included in the plan, the requirements of the current SIP rule can be subsumed by the authority of District Rule 3.4, New Source Review.

The automotive coating operation is subject to other federally enforceable coating records requirements based on the authority of District Rule 3.4 which are more stringent, and therefore, this Rule 2.26 requirement can be subsumed by the Rule 3.4 requirement.

#### **Subsuming Permit Condition**

The Permit Holder shall maintain a current list that includes the following for all VOC containing materials:

- a. Material name and manufacturer's product data sheet or material safety data sheet (MSDS);
- b. Material application method;

- c. Material category and specific mix ratio;
- d. Actual VOC content (in g/l or lb/gallon); and
- e. As-applied regulatory VOC content (in g/l or lb/gallon). [District Rule 2.26, §501.1-501.2 and District Rule 3.4]

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**Rule Requirement #7** - Coating Use Log

Section 507.3 of the rule reads:

- "507.3 The person shall maintain records on a daily basis including the following information:*
- a. Coating and mix ratio of components in the coatings used.*
  - b. Quantity of each coating applied."*

**Subsuming Demonstration:** The District has revised District Rule 2.26 and is taking steps to include the revised rule in the California SIP. Until the revised rule is included in the plan, the requirements of the current SIP rule can be subsumed by the authority of District Rule 3.4, New Source Review.

The automotive coating operation is subject to other federally enforceable coating application tracking requirements based on the authority of District Rule 3.4 which are more stringent, and therefore, this Rule 2.26 requirement can be subsumed by the Rule 3.4 requirement.

**Subsuming Permit Condition**

The Permit Holder shall maintain records on a daily basis that include the coatings used, the quantity and mix ratio of each coating applied, and the corresponding VOC emissions. [District Rule 2.26, §501.3 and District Rule 3.4]

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**Rule Requirement #8** - Coating Inventory

Section 507.1 of the rule reads:

- "507.1 The person shall maintain and have available during an inspection, the listed category of each of the coatings and the type of vehicle or equipment to which each coating was applied."*

**Subsuming Demonstration:** The District has revised District Rule 2.26 and is taking steps to include the revised rule in the California SIP. Until the revised rule is included in the plan, the requirements of the current SIP rule can be subsumed by the authority of District Rule 3.4, New Source Review.

The automotive coating operation is subject to another federally enforceable coating inventory tracking requirement based on the authority of District Rule 3.4

which is more stringent, and therefore, this Rule 2.26 requirement can be subsumed by the Rule 3.4 requirement.

**Subsuming Permit Condition**

The Permit Holder shall maintain purchase records identifying the type, name, and volume of each VOC containing material, and any other records necessary to demonstrate compliance with this permit. [District Rule 2.26, §501.4 and District Rule 3.4]

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**Rule Requirement #9** - Record Retention

Section 507.6 of the rule reads:

*"507.6 Such records shall be retained and available for inspection by the District for the previous 24 month period."*

**Subsuming Demonstration:** The District has revised District Rule 2.26 and is taking steps to include the revised rule in the California SIP. Until the revised rule is included in the plan, the requirements of the current SIP rule can be subsumed by the authority of District Rule 3.4, New Source Review.

The automotive coating operation is subject to another federally enforceable coating record retention requirement based on the authority of District Rule 3.4 which is more stringent, and therefore, this Rule 2.26 requirement can be subsumed by the Rule 3.4 requirement.

**Subsuming Permit Condition**

All required records shall be retained for a minimum of five (5) years and shall be made available for District inspection upon request. [District Rule 3.4]

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**RULE 2.31 Surface Preparation and Cleanup**

**Rule Description**

The purpose of this rule is to limit the emissions of volatile organic compounds (VOC) from surface preparation and clean up, and from the storage and disposal of materials used for surface preparation and cleanup.

**Compliance Status**

The source is currently in compliance with the rule.

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**Rule Requirement #1** - Short Term Solvent VOC Content

Sections 301.1, 301.2 and 301.3 of the rule read:

- "301.1 On or after January 1, 1996, the solvents used on substrates during the manufacturing process or for surface preparation prior to coating, adhesive, or ink applications shall have a VOC content of 200 grams or less of VOC per liter of material.*
- 301.2 On and after January 1, 1996, the solvents used for maintenance and repair cleaning shall have a VOC content of 900 grams or less of VOC per liter of material and a VOC composite partial pressure of 20 mm Hg or less at 20°C (68°F).*
- 301.3 On and after January 1, 1996, the solvents used for cleaning coatings or adhesives application equipment shall have a VOC content of 950 grams or less of VOC per liter of material and a VOC composite partial pressure of 35 mm Hg or less at 20°C (68°F)."*

**Subsuming Demonstration:** The District has revised District Rule 2.31 and is taking steps to include the revised rule in the California SIP. Until the revised rule is included in the plan, the requirements of the current SIP rule can be subsumed by the authority of District Rule 3.4, New Source Review.

The automotive coating operation is subject to another federally enforceable solvent VOC content requirement based on the authority of District Rule 3.4 which is more stringent, and therefore, this Rule 2.31 requirement can be subsumed by the Rule 3.4 requirement.

**Subsuming Permit Condition**

Until January 1, 2011, the maximum VOC content of solvents used for product cleaning, and the cleaning of coating equipment shall not exceed 50 g/l (0.42 lb/gallon). [District Rule 2.31, §301 District Rule 3.4]\_\_\_

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**Rule Requirement #2** - Long Term Solvent VOC Content

Sections 301.1, 301.2 and 301.3 of the rule read:

- "301.1 On or after January 1, 1996, the solvents used on substrates during the manufacturing process or for surface preparation prior to coating, adhesive, or ink applications shall have a VOC content of 200 grams or less of VOC per liter of material.*
- 301.2 On and after January 1, 1996, the solvents used for maintenance and repair cleaning shall have a VOC content of 900 grams or less of VOC per liter of material and a VOC composite partial pressure of 20 mm Hg or less at 20°C (68°F).*

*301.3 On and after January 1, 1996, the solvents used for cleaning coatings or adhesives application equipment shall have a VOC content of 950 grams or less of VOC per liter of material and a VOC composite partial pressure of 35 mm Hg or less at 20°C (68°F)."*

**Subsuming Demonstration:** The District has revised District Rule 2.31 and is taking steps to include the revised rule in the California SIP. Until the revised rule is included in the plan, the requirements of the current SIP rule can be subsumed by the authority of District Rule 3.4, New Source Review.

The automotive coating operation is subject to another federally enforceable solvent VOC content requirement based on the authority of District Rule 3.4 which is more stringent, and therefore, this Rule 2.31 requirement can be subsumed by the Rule 3.4 requirement.

**Subsuming Permit Condition**

Effective January 1, 2011, the maximum VOC content of solvents used for product cleaning, and the cleaning of coating equipment shall not exceed 25 g/l (0.21 lb/gallon). [District Rule 2.31, §301 District Rule 3.4]\_\_\_\_\_

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**Rule Requirement #3 - Cleaning Methods**

Sections 302.1 through 302.7 of the rule read:

*"A person shall not perform solvent cleaning operations unless one of the following cleaning devices or methods is used:*

*302.1 Wipe cleaning;*

*302.2 Spray bottles or containers with a maximum capacity of 16 fluid ounces from which solvents are applied without a propellant-induced force;*

*302.3 Cleaning equipment which has a solvent container that can be, and is, closed during cleaning operations, except when depositing and removing objects to be cleaned, and is closed during non-operation with the exception of maintenance and repair to the cleaning equipment itself;*

*302.4 Cleaning device or mechanism which has been determined by the Air Pollution Control Officer to result in equivalent or lower emissions;*

*302.5 Remote reservoir cold cleaner used pursuant to Section 303 of this Rule;*

*302.6 Non-atomized solvent flow method where 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*

*302.7 Solvent flushing method where the cleaning solvent is discharged into a container which 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."*

**Subsuming Demonstration:** The District has revised District Rule 2.31 and is taking steps to include the revised rule in the California SIP. Until the revised rule is included in the plan, the requirements of the current SIP rule can be subsumed by the authority of District Rule 3.4, New Source Review.

The automotive coating operation is subject to another federally enforceable solvent cleaning method requirement based on the authority of District Rule 3.4 which is more stringent, and therefore, this Rule 2.31 requirement can be subsumed by the Rule 3.4 requirement.

#### **Subsuming Permit Condition**

The Permit Holder shall only use the following methods to apply solvents with a VOC-content greater than 25 g/l (0.21 lb/gallon) process used for surface preparation:

- a. Wipe Cleaning;
- b. Spray bottles or containers with a maximum capacity of 16 fluid ounces from which solvents are applied without a propellant-induced force; or
- c. Any other method approved by the District. [District Rules 3.4 and District Rule 2.31, §302]

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#### **Rule Requirement #4** - Coating Equipment Cleaning Methods

Section 302.3 of the rule reads:

*"A person shall not perform solvent cleaning operations unless one of the following cleaning devices or methods is used:*

*302.3 Cleaning equipment which has a solvent container that can be, and is, closed during cleaning operations, except when depositing and removing objects to be cleaned, and is closed during non-operation with the exception of maintenance and repair to the cleaning equipment itself;"*

**Subsuming Demonstration:** The District has revised District Rule 2.31 and is taking steps to include the revised rule in the California SIP. Until the revised rule is included in the plan, the requirements of the current SIP rule can be subsumed by the authority of District Rule 3.4, New Source Review.

The automotive coating operation is subject to another federally enforceable coating equipment cleaning method requirement based on the authority of District Rule 3.4 which is more stringent, and therefore, this Rule 2.31 requirement can be subsumed by the Rule 3.4 requirement.

#### **Subsuming Permit Condition**

The Permit Holder shall not use VOC containing materials with a VOC content greater than 25 g/l (0.21 lb/gallon) for the cleanup of coating equipment unless:

- a. The spray equipment is disassembled and cleaned in an enclosed gun washer or other low emission washing system that has been demonstrated to be at least equivalent to an enclosed system;
- b. The system must fully enclose the spray guns, cups, nozzles, bowls, and other parts during washing, rinsing and draining procedures;
- c. The system must be used according to the manufacturer's recommendations; and
- d. The system must be closed when not in use. [District Rule 3.4 and District Rule 2.31, §301 and §306]

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Therefore, the spray equipment cleanup requirements of Rule 2.31 has been streamlined by the New Source Review requirements.\_\_\_\_

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#### **Rule Requirement #5** - Storage and Disposal

Section 304 of the rule reads:

*"All VOC-containing materials used in solvent cleaning operations, regardless of their VOC-content, such as solvents, and cloth and paper moistened with solvents, shall be stored in non-absorbent, non-leaking containers which shall be kept closed at all times except when filling or emptying."*

**Subsuming Demonstration:** The District has revised District Rule 2.31 and is taking steps to include the revised rule in the California SIP. Until the revised rule is included in the plan, the requirements of the current SIP rule can be subsumed by the authority of District Rule 3.4, New Source Review.

The automotive coating operation is subject to another federally enforceable storage and disposal requirement based on the authority of District Rule 3.4 which is more stringent, and therefore, this Rule 2.31 requirement can be subsumed by the Rule 3.4 requirement.

**Subsuming Permit Condition**

The Permit Holder shall use closed containers for the storage or disposal of cloth, paper, or other VOC containing materials (including paint, thinners, catalysts, reducers, solvent and spent solvent used for surface preparation, clean-up, and coating applications). [District Rule 2.26, §306 and District Rule 2.31, §308 and District Rule 3.4]

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**Rule Requirement #6** - Solvent Technical Information

Section 501 of the rule reads:

*“Records shall be maintained pursuant to this Section, for all applications subject to this Rule, including those exempted under Sections 110 through 118 of this Rule, except for cleaning operations performed with a solvent which has a water content of 98 percent or more, by weight, or a VOC composite partial pressure of 0.1 mm Hg or less at 20°C (68°F). Each owner or operator of a facility subject to the provisions of this Rule shall collect and record all information necessary to demonstrate daily compliance with the requirements of Section 300 of this Rule or with the exemption conditions of Sections 110 through 118 of this Rule, and shall maintain this information at the facility for a period of two years. The information shall be collected and recorded monthly, and shall be made available to the Air Pollution Control Officer upon request. The information shall include, but not limited to, the following:*

- 501.1 Identification of each solvent cleaning operation and other process at the facility subject to this Rule. the identification shall include location, permit number (if applicable), description of activity, and substrate type;*
- 501.2 The amount and type of each VOC-containing material used at each operation and process, including exempt compounds. Use of amounts of one pint per week or less may be recorded on a monthly basis;*
- 501.3 The VOC content of each VOC-containing material;*
- 501.4 Where applicable, the vapor pressure of each VOC-containing material; and*
- 501.5 Records demonstrating compliance with Section 305 of this Rule.”*

**Subsuming Demonstration:** The District has revised District Rule 2.31 and is taking steps to include the revised rule in the California SIP. Until the revised rule is included in the plan, the requirements of the current SIP rule can be subsumed by the authority of District Rule 3.4, New Source Review.

The automotive coating operation is subject to other federally enforceable record keeping requirements based on the authority of District Rule 3.4 which are more stringent, and therefore, this Rule 2.31 requirement can be subsumed by the Rule 3.4 requirement.

**Subsuming Permit Condition**

The Permit Holder shall maintain a current list that includes the following for all VOC containing materials:

- a. Material name and manufacturer's product data sheet or material safety data sheet (MSDS);
- b. Material application method;
- c. Material category and specific mix ratio;
- d, Actual VOC content (in g/l or lb/gallon); and
- e. As-applied regulatory VOC content (in g/l or lb/gallon). [District Rule 2.26, §501.1-501.2, District Rule 2.31, §501.1-501.3, and District Rule 3.4]

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**Rule Requirement #7** - Solvent Usage Records

Section 501 of the rule reads:

*"Records shall be maintained pursuant to this Section, for all applications subject to this Rule, including those exempted under Sections 110 through 118 of this Rule, except for cleaning operations performed with a solvent which has a water content of 98 percent or more, by weight, or a VOC composite partial pressure of 0.1 mm Hg or less at 20°C (68°F). Each owner or operator of a facility subject to the provisions of this Rule shall collect and record all information necessary to demonstrate daily compliance with the requirements of Section 300 of this Rule or with the exemption conditions of Sections 110 through 118 of this Rule, and shall maintain this information at the facility for a period of two years. The information shall be collected and recorded monthly, and shall be made available to the Air Pollution Control Officer upon request. The information shall include, but not limited to, the following:*

*501.1 Identification of each solvent cleaning operation and other process at the facility subject to this Rule. the identification shall include location, permit number (if applicable), description of activity, and substrate type;*

*501.2 The amount and type of each VOC-containing material used at each operation and process, including exempt compounds. Use of amounts of one pint per week or less may be recorded on a monthly basis;*

*501.3 The VOC content of each VOC-containing material;*

*501.4 Where applicable, the vapor pressure of each VOC-containing material; and*

*501.5 Records demonstrating compliance with Section 305 of this Rule.”*

**Subsuming Demonstration:** The District has revised District Rule 2.31 and is taking steps to include the revised rule in the California SIP. Until the revised rule is included in the plan, the requirements of the current SIP rule can be subsumed by the authority of District Rule 3.4, New Source Review.

The automotive coating operation is subject to other federally enforceable record keeping requirements based on the authority of District Rule 3.4 which are more stringent, and therefore, this Rule 2.31 requirement can be subsumed by the Rule 3.4 requirement.

#### **Subsuming Permit Condition**

The Permit Holder shall maintain records on a monthly basis that include the solvents used, the quantity and mix ratio of each solvent applied, and the corresponding VOC emissions. [District Rule 2.31, §501.2 and District Rule 3.4]

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#### **Rule Requirement #8 - Solvent Inventory**

Section 501 of the rule reads:

*“Records shall be maintained pursuant to this Section, for all applications subject to this Rule, including those exempted under Sections 110 through 118 of this Rule, except for cleaning operations performed with a solvent which has a water content of 98 percent or more, by weight, or a VOC composite partial pressure of 0.1 mm Hg or less at 20°C (68°F). Each owner or operator of a facility subject to the provisions of this Rule shall collect and record all information necessary to demonstrate daily compliance with the requirements of Section 300 of this Rule or with the exemption conditions of Sections 110 through 118 of this Rule, and shall maintain this information at the facility for a period of two years. The information shall be collected and recorded monthly, and shall be made available to the Air Pollution Control Officer upon request. The information shall include, but not limited to, the following:*

*501.1 Identification of each solvent cleaning operation and other process at the facility subject to this Rule. the identification shall include location, permit number (if applicable), description of activity, and substrate type;*

*501.2 The amount and type of each VOC-containing material used at each operation and process, including exempt compounds. Use of amounts of one pint per week or less may be recorded on a monthly basis;*

*501.3 The VOC content of each VOC-containing material;*

*501.4 Where applicable, the vapor pressure of each VOC-containing material; and*

*501.5 Records demonstrating compliance with Section 305 of this Rule.”*

**Subsuming Demonstration:** The District has revised District Rule 2.31 and is taking steps to include the revised rule in the California SIP. Until the revised rule is included in the plan, the requirements of the current SIP rule can be subsumed by the authority of District Rule 3.4, New Source Review.

The automotive coating operation is subject to other federally enforceable record keeping requirements based on the authority of District Rule 3.4 which are more stringent, and therefore, this Rule 2.31 requirement can be subsumed by the Rule 3.4 requirement.

#### **Subsuming Permit Condition**

The Permit Holder shall maintain purchase records identifying the type, name, and volume of each VOC containing material, and any other records necessary to demonstrate compliance with this permit. [District Rule 2.31, §501.4 and District Rule 3.4]

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#### **Rule Requirement #9** - Record Retention

Section 501 of the rule reads:

*“Records shall be maintained pursuant to this Section, for all applications subject to this Rule, including those exempted under Sections 110 through 118 of this Rule, except for cleaning operations performed with a solvent which has a water content of 98 percent or more, by weight, or a VOC composite partial pressure of 0.1 mm Hg or less at 20°C (68°F). Each owner or operator of a facility subject to the provisions of this Rule shall collect and record all information necessary to demonstrate daily compliance with the requirements of Section 300 of this Rule or with the exemption conditions of Sections 110 through 118 of this Rule, and shall maintain this information at the facility for a period of two years. The information shall be collected and recorded monthly, and shall be made available to the Air Pollution Control Officer upon request. The information shall include, but not limited to, the following:*

*501.1 Identification of each solvent cleaning operation and other process at the facility subject to this Rule. the identification shall include location, permit number (if applicable), description of activity, and substrate type;*

*501.2 The amount and type of each VOC-containing material used at each operation and process, including exempt compounds. Use of amounts of one pint per week or less may be recorded on a monthly basis;*

*501.3 The VOC content of each VOC-containing material;*

*501.4 Where applicable, the vapor pressure of each VOC-containing material; and*

*501.5 Records demonstrating compliance with Section 305 of this Rule.”*

**Subsuming Demonstration:** The District has revised District Rule 2.31 and is taking steps to include the revised rule in the California SIP. Until the revised rule is included in the plan, the requirements of the current SIP rule can be subsumed by the authority of District Rule 3.4, New Source Review.

The automotive coating operation is subject to other federally enforceable record keeping requirements based on the authority of District Rule 3.4 which are more stringent, and therefore, this Rule 2.31 requirement can be subsumed by the Rule 3.4 requirement.

#### **Subsuming Permit Condition**

All required records shall be retained for a minimum of five (5) years and shall be made available for District inspection upon request. [District Rule 3.4].

### **RULE 3.1 General Permit Requirements**

#### **Rule Description**

The purpose of this rule is to provide an orderly procedure for the review of new sources of air pollution and of the modification and operation of existing sources through the issuance of permits.

#### **Compliance Status**

The source is currently in compliance with the rule.

#### **Permit Conditions**

No person shall build, erect, alter, or replace any facility, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants, without first obtaining an authorization to construct from the APCO as specified in Section 401 of District Rule 3.1. [District Rule 3.1, §301.1]

No person shall operate any facility, article, machine, equipment, or other contrivance, for which an authorization to construct is required by District Rules and Regulations without first obtaining a written permit from the APCO. [District Rule 3.1, §302.1]

No person shall operate any facility, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate or reduce or control the issuance of air contaminants, without obtaining a permit from the APCO or the Hearing Board. [District Rule 3.1, §302.2]

The owner or operator of any facility, article, machine, equipment, or other contrivance for which a permit to operate is in effect shall notify the District office whenever a breakdown, malfunction, or operational upset condition exists which would tend to increase emissions of air pollutants or whenever any operating condition contrary to any provision of the permit to operate exists. Such notice shall be given to the District no later than four hours after occurrence during regular workday hours or no later than two hours of the District workday following an occurrence not during regular District workday hours. The notice shall provide the District information as to causes and corrective action being taken, with a schedule for return to required operating conditions. [District Rule 3.1, §405.3]

#### **RULE 3.4 New Source Review**

##### **Rule Description**

This rule applies to all new stationary sources and emissions units and all modifications to existing stationary sources and emissions units which are subject to District Rule 3.1, GENERAL PERMIT REQUIREMENTS, and which, after construction or modification, emit or may emit any affected pollutants. This rule shall not apply to prescribed burning of forest, agriculture or range land, road construction or any other non-point source common to timber harvesting or agricultural practices. The purpose of this rule is to provide for the review of new and modified stationary air pollution sources and to provide mechanisms, including emission offsets, by which authorities to construct such sources may be granted without interfering with the attainment or maintenance of ambient air quality standards.

##### **Compliance Status**

The source has satisfied the provisions of New Source Review. The New Source Review requirements were imposed on the most recent Authorities to Construct issued to the source. The New Source Review Requirements are shown below:

##### **Permit Conditions**

**Emission Limits For Permit Unit**

| Permit     | Pollutant        | Daily<br>[lb] | Qtr #1                     | Qtr #2                      | Qtr #3                       | Qtr #4                     | Yearly<br>[tons] |
|------------|------------------|---------------|----------------------------|-----------------------------|------------------------------|----------------------------|------------------|
|            |                  |               | (Jan 1-<br>Mar 31)<br>[lb] | (Apr 1-<br>June 30)<br>[lb] | (July 1-<br>Sept 30)<br>[lb] | (Oct 1-<br>Dec 31)<br>[lb] |                  |
| P-53-88(a) | VOC              | 29.2          | 1,619                      | 1,637                       | 1,655                        | 1,655                      | 2.17             |
|            | CO               | -             | -                          | -                           | -                            | -                          | -                |
|            | NOx              | -             | -                          | -                           | -                            | -                          | -                |
|            | SOx              | -             | -                          | -                           | -                            | -                          | -                |
|            | PM <sub>10</sub> | 2.3           | 210                        | 213                         | 215                          | 215                        | 0.28             |

**Applicable Operating Requirements**

**Process Limits**

The emissions of VOCs from the automotive coating operation of P-53-88(a) shall not exceed 29.2 pounds daily, 1,619 pounds in the 1st calendar quarter, 1,637 pounds in the 2nd calendar quarter, 1,655 pounds in the 3rd calendar quarter, 1,655 pounds in the 4th calendar quarter, and 4,348 pounds in the calendar year. [District Rule 3.4/C-10-30]

**Work Practice and Operational Requirements for P-53-88(a)**

All painting shall be conducted in booth with filters in place, fan operating, and doors closed. [District Rule 3.4/C-10-30]

The Permit Holder shall not release or discharge into the atmosphere, particulate matter in excess of 0.001 grains per cubic foot of exhaust volume as calculated at standard conditions. [District Rule 3.4/C-10-30]

The Permit Holder shall not discharge into the atmosphere from any single source of emission whatsoever, any air contaminant for a period or periods aggregating more than three (3) minutes in any one (1) hour which is:

- a. As dark or darker in shade than No. 1 on the Ringelmann Chart; or
- b. Greater than 20% opacity. [District Rule 3.4/C-10-30]

The Permit Holder shall not apply to any motor vehicle, mobile equipment, or associated parts and components, any coating with a VOC regulatory content (less water and exempt compounds) in excess of the following limits:

| COATING TYPE         | VOC Content Limit    |
|----------------------|----------------------|
| Adhesion Promoter    | 540 g/l (4.5 lb/gal) |
| Clear Coating        | 250 g/l (2.1 lb/gal) |
| Color Coating        | 420 g/l (3.5 lb/gal) |
| Multi-Color Coating  | 680 g/l (5.7 lb/gal) |
| Pretreatment Coating | 660 g/l (5.5 lb/gal) |

|                              |                      |
|------------------------------|----------------------|
| Primer                       | 250 g/l (2.1 lb/gal) |
| Primer Sealer                | 250 g/l (2.1 lb/gal) |
| Single-Stage Coating         | 340 g/l (2.8 lb/gal) |
| Temporary Protective Coating | 60 g/l (0.5 lb/gal)  |
| Truck Bed Liner Coating      | 310 g/l (2.6 lb/gal) |
| Underbody Coating            | 430 g/l (3.6 lb/gal) |
| Uniform Finish Coating       | 540 g/l (4.5 lb/gal) |
| Any Other Coating Type       | 250 g/l (2.1 lb/gal) |

[District Rule 2.26, §302 and District Rule 3.4/C-10-30]

The Permit Holder shall not apply any coating to any motor vehicle, mobile equipment, or associated parts and components by any method other than high volume low pressure (HVLP) spray equipment, unless such equipment has written approval from the District. [District Rule 2.26, §304 and District Rule 3.4/C-10-30]

The Permit Holder shall not use or possess any automotive coatings containing hexavalent chromium or cadmium. [District Rule 2.26, §308 and California Code of Regulations, Title 17, §93112 and District Rule 3.4/C-10-30]

Until January 1, 2011, the maximum VOC content of solvents used for product cleaning, and the cleaning of coating equipment shall not exceed 50 g/l (0.42 lb/gallon). [District Rule 2.31, §301 and District Rule 3.4/C-10-30]

Effective January 1, 2011, the maximum VOC content of solvents used for product cleaning, and the cleaning of coating equipment shall not exceed 25 g/l (0.21 lb/gallon). [District Rule 2.31, §301 and District Rule 3.4/C-10-30]

The Permit Holder shall only use the following methods to apply solvents with a VOC-content greater than 25 g/l (0.21 lb/gallon) process used for surface preparation:

- a. Wipe Cleaning;
- b. Spray bottles or containers with a maximum capacity of 16 fluid ounces from which solvents are applied without a propellant-induced force; or
- c. Any other method approved by the District. [District Rule 2.31, §302 and District Rule 3.4/C-10-30]

The Permit Holder shall not use VOC containing materials with a VOC content greater than 25 g/l (0.21 lb/gallon) for the cleanup of coating equipment unless:

- a. The system must fully enclose the spray guns, cups, nozzles, bowls, and other parts during washing, rinsing and draining procedures;
- b. The system must be used according to the manufacturer's recommendations; and
- c. The system must be closed when not in use. [District Rule 2.31, §301 and §306 and District Rule 3.4/C-10-30]

The Permit Holder shall use closed containers for the storage or disposal of cloth, paper, or other VOC containing materials (including paint, thinners, catalysts, reducers, solvent and spent solvent used for surface preparation, clean-up, and coating applications). [District Rule 2.26, §306, District Rule 2.31, §308, and District Rule 3.4/C-10-30]

### **Recordkeeping Requirements**

The Permit Holder shall maintain a current list that includes the following for all VOC containing materials:

- a. Material name and manufacturer's product data sheet or material safety data sheet (MSDS);
- b. Material application method;
- c. Material category and specific mix ratio;
- d. Actual VOC content (in g/l or lb/gallon); and
- e. As-applied regulatory VOC content (in g/l or lb/gallon). [District Rule 2.26, §501.1-501.2, District Rule 2.31, §501.1-501.3, and District Rule 3.4/C-10-30]

The Permit Holder shall maintain records on a daily basis that include the coatings used, the quantity and mix ratio of each coating applied, and the corresponding VOC emissions. [District Rule 2.26, §501.3 and District Rule 3.4/C-10-30]

The Permit Holder shall maintain records on a monthly basis that include the solvents used, the quantity and mix ratio of each solvent applied, and the corresponding VOC emissions. [District Rule 2.31, §501.2 and District Rule 3.4/C-10-30]

The Permit Holder shall maintain purchase records identifying the type, name, and volume of each VOC containing material, and any other records necessary to demonstrate compliance with this permit. [District Rule 2.26, §501.4, District Rule 2.31, §501.4, and District Rule 3.4/C-10-30]

All required records shall be retained for a minimum of five (5) years and shall be made available for District inspection upon request. [District Rule 3.4/C-10-30]

## **RULE 3.8 Federal Operating Permits**

### **Rule Description**

This Rule implements the requirements of Title V of the Federal Clean Air Act as amended in 1990 (CAA) for permits to operate. Title V provides for the establishment of operating permit programs for sources which emit regulated air pollutants, including attainment and non-attainment pollutants.

### **Compliance Status**

The source is currently in compliance with the requirements of the rule. The source was issued an initial Title V operating permit on October 19, 2005. The source currently has one application for an Authority to Construct being processed according to the District's Enhanced New Source Review (NSR) guidelines in District Rule 3.4, Section 404. The District Enhanced NSR program provides that if the provisions of District Rule 3.8, Federal operating Permits are followed at the time of District Permit for construction, including noticing requirements, then the changes to the Title V Permit are administrative changes after the construction is completed and the District permit is issued.

The proposed change to the automotive coating operation is not an administrative permit amendment (District Rule 3.8, Section 203) because the proposed change is not fixing typographical errors, is not fixing administrative changes at the stationary source, is not requiring more frequent monitoring or reporting, is not implementing a transfer of ownership or operational control, and the modification is not incorporating a preconstruction review into the Title V permit.

The proposed change is not a significant permit modification (District Rule 3.8, Section 228) because it does not significantly change monitoring conditions, does not provide for the relaxation of any reporting or record keeping conditions, does not involve a permit term or condition which allows a source to avoid an applicable federal requirement, including a federally-enforceable voluntary emissions cap or an alternative Hazardous Air Pollutant (HAP) emissions limit, does not involve a case-by-case determination of any emission standard or other requirement and does not involve a source-specific determination for ambient impacts, visibility analysis, or increment analysis on portable sources.

The change in coating throughput at the source is a minor modification pursuant to District Rule 3.8, Section 222. By definition, for a proposed change to qualify as a minor modification, it must not be a significant permit modification and must not be an administrative permit amendment.

A minor permit modification requires that the District provide written notice of the proposed decision to U.S. EPA, Air Resources Board (ARB), and affected states within five working days, pursuant to District Rule 3.8, Section 409.2. There are no public notice requirements for a minor permit modification.

Upon implementation of the District ATC into the PTO, the source may submit a written request for District action to amend the Title V operating permit pursuant to District Rule 3.8, Section 404.1. Since the ATC has been processed according to enhanced NSR guidelines, upon written request by the source, the District shall incorporate the changes into the Title V permit as an administrative permit amendment pursuant to District Rule 3.8, Section 412.1.

#### **Permit Conditions**

**Right of Entry:**

The permit shall require that the source allow the entry of the District, ARB, or U.S. EPA officials for the purpose of inspection and sampling, including:

- a. Inspection of the stationary source, including equipment, work practices, operations, and emissions-related activity;
- b. Inspection and duplication of records required by the permit to operate; and
- c. Source sampling or other monitoring activities. [District Rule 3.8, §302.10]

**Compliance with Permit Conditions:**

The Permit Holder shall comply with all Title V permit conditions. [District Rule 3.8, §302.11(a)]

The permit does not convey property rights or exclusive privilege of any sort. [District Rule 3.8, §302.11(b)]

Non-compliance with any permit condition is grounds for permit termination, revocation and reissuance, modification, enforcement action, or denial of permit renewal. [District Rule 3.8, §302.11(c)]

The Permit Holder shall not use the "need to halt or reduce a permitted activity in order to maintain compliance" as a defense for non-compliance with any permit condition. [District Rule 3.8, §302.11(d)]

A pending permit action or notification of anticipated non-compliance does not stay any permit condition. [District Rule 3.8, §302.11(e)]

Within a reasonable time period, the Permit Holder shall furnish any information requested by the APCO, in writing, for the purpose of determining:

- a. Compliance with the permit; or
- b. Whether or not cause exists for a permit or enforcement action. [District Rule 3.8, §302.11(f)]

**Emergency Provisions:**

Within two weeks of an emergency event, the owner or operator shall submit to the District a properly signed contemporaneous log or other relevant evidence demonstrating that:

- a. An emergency occurred;
- b. The Permit Holder can identify the cause(s) of the emergency;
- c. The facility was being properly operated at the time of the emergency;
- d. All steps were taken to minimize the emissions resulting from the emergency;

- e. Within two working days of the emergency event, the Permit Holder provided the District with a description of the emergency and any mitigating or corrective actions taken; and
- f. In any enforcement proceeding, the Permit Holder has the burden of proof for establishing that an emergency occurred. [District Rule 3.8, §302.12]

**Severability**

If any provision, clause, sentence, paragraph, section or part of these conditions for any reason is judged to be unconstitutional or invalid, such judgement shall not affect or invalidate the remainder of these conditions. [District Rule 3.8, §302.13]

**Compliance Certification**

The responsible official shall submit a compliance certification to the U.S. EPA and the APCO every 12 months unless required more frequently by an applicable requirement. [District Rule 3.8, §302.14(a)]

The compliance certification shall identify the basis for each permit term or condition (e.g., specify the emissions limitation, standard, or work practice) and a means of monitoring compliance with the term or condition consistent with Sections 302.5, 302.6, and 302.7 of Rule 3.8. [District Rule 3.8, §302.14(b)]

The compliance certification shall include a statement of the compliance status, whether compliance was continuous or intermittent, and method(s) used to determine compliance for the current time period and over the entire reporting period. [District Rule 3.8, §302.14(c)]

The compliance certification shall include any additional inspection, monitoring, or entry requirement that may be promulgated pursuant to Sections 114(a) and 504(b) of the Federal Clean Air Act. [District Rule 3.8, §302.14(d)]

**Permit Life:**

The Title V permit shall expire five years from the date of issuance. Title V permit expiration terminates the stationary source's right to operate unless a timely and complete Title V permit application for renewal has been submitted. [District Rule 3.8, §302.15]

**Payment of Fees:**

An owner or operator shall pay the appropriate Title V permit fees on schedule. If fees are not paid on schedule, the permit is forfeited. Operation without a permit subjects the source to potential enforcement action by the District and the U.S. EPA pursuant to Section 502(a) of the CAA. [District Rule 3.8, §302.16]

**Permit Revision Exemption:**

No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes, for changes that are provided for in the permit. [District Rule 3.8, §302.22]

**Application Requirements:**

An owner or operator shall submit a standard District application for renewal of the Title V permit, no earlier than 18 months and no later than six months before the expiration date of the current permit to operate. [District Rule 3.8, §402.2]

An owner or operator shall submit a standard District application for each emissions unit affected by a proposed permit revision that qualifies as a significant Title V permit modification. The application shall be submitted after obtaining any required preconstruction permits. Upon request by the APCO, the owner or operator shall submit copies of the latest preconstruction permit for each affected emissions unit. The emissions unit(s) shall not commence operation until the APCO approves the permit revision. [District Rule 3.8, §402.3]

An owner or operator shall submit a standard District application for each emissions unit affected by the proposed permit revision that qualifies as a minor permit modification. The application shall be submitted after obtaining any required preconstruction permits. The emissions unit(s) shall not commence operation until the APCO approves the permit revision. In the application, the owner or operator shall include the following:

- a. A description of the proposed permit revision, any change in emissions, and additional applicable federal requirements that will apply;
- b. Proposed permit terms and conditions; and
- c. A certification by a responsible official that the permit revision meets criteria for use of minor permit modification procedures and a request that such procedures be used. [District Rule 3.8, §402.4]

**Permit Reopening for Cause:**

Circumstances that are cause for reopening and revision of a permit include, but are not limited to, the following:

- a. The need to correct a material mistake or inaccurate statement;
- b. The need to revise or revoke a permit to operate to assure compliance with applicable federal requirements;
- c. The need to incorporate any new, revised, or additional applicable federal requirements, if the remaining authorized life of the permit is 3 years or greater, no later than 18 months after the promulgation of such requirement (where less than 3 years remain in the authorized life of the permit, the APCO shall incorporate the requirements into the permit to operate upon renewal); or

- d. Additional requirements promulgated pursuant to Title IV as they become applicable to any acid rain unit governed by the permit. [District Rule 3.8, §413.1]

**Monitoring, Testing and Analysis:**

The source is not subject to any monitoring, testing, or analysis requirements pursuant to any federal regulation. No monitoring, testing, or analysis requirements will be placed on the permit.

**Recordkeeping:**

The permit holder shall record maintenance of all monitoring and support information required by any applicable federal requirement, including:

- a. Date, place, and time of sampling;
- b. Operating conditions at the time of sampling;
- c. Date, place, and method of analysis; and
- d. Results of the analysis. [District Rule 3.8, §302.6(a)]

The permit holder shall retain records of all required monitoring data and support information for a period of at least five years from the date of sample collection, measurement, report, or application. [District Rule 3.8, §302.6(b)]

**Reporting Requirements:**

Any deviation from permit requirements, including that attributable to upset conditions (as defined in the permit), shall be promptly reported to the APCO. For the purpose of this condition prompt means as soon as reasonably possible, but no later than 10 days after detection.[District Rule 3.8, §302.7(a)]

A monitoring report shall be submitted at least every six months and shall identify any deviation from permit requirements, including that previously reported to the APCO pursuant to Section 302.7(a) of District Rule 3.8. [District Rule 3.8, §302.7(b)]

All reports of deviation from permit requirements shall include the probable cause of the deviation and any preventive or corrective action taken. [District Rule 3.8, §302.7(c)]

Each monitoring report shall be accompanied by a written statement from the responsible official that certifies the truth, accuracy, and completeness of the report. [District Rule 3.8, §302.7(e)]

This subpart provides guidelines for developing a compliance assurance monitoring (CAM) plan. The CAM plan requires that a stationary source monitor the appropriate parameters of a process or its control equipment, and/or measure the process' actual emissions, so as to ensure emission compliance on an on-going basis.

The CAM requirements apply to any pollutant specific emissions unit at a major source that is required to obtain a Part 70 permit and which satisfies all of the following:

- a. The unit is subject to an emission limit or standard for an applicable regulated air pollutant;
- b. The unit uses a control device to achieve compliance with any such emission limitation or standard; and
- c. The unit's pre-control device potential to emit of an applicable regulated pollutant is greater than or equal to that pollutant's major source threshold.

#### **Compliance Status**

C-10-30 is exempt from the requirements of this federal subpart, since the emissions unit does not have a pre-control device potential to emit greater than or equal to any of the major source thresholds.

#### **Permit Condition**

The permit does not require CAM specific conditions for the abovementioned emission unit.