

## **FACILITY PERMIT TO OPERATE**

**AMERICAN SECURITY PRODUCTS CO INC  
11925 PACIFIC AVE  
FONTANA, CA 92337**

### **NOTICE**

IN ACCORDANCE WITH RULE 206, THIS PERMIT TO OPERATE OR A COPY THEREOF MUST BE KEPT AT THE LOCATION FOR WHICH IT IS ISSUED.

THIS PERMIT DOES NOT AUTHORIZE THE EMISSION OF AIR CONTAMINANTS IN EXCESS OF THOSE ALLOWED BY DIVISION 26 OF THE HEALTH AND SAFETY CODE OF THE STATE OF CALIFORNIA OR THE RULES OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT. THIS PERMIT SHALL NOT BE CONSTRUED AS PERMISSION TO VIOLATE EXISTING LAWS, ORDINANCES, REGULATIONS OR STATUTES OF ANY OTHER FEDERAL, STATE OR LOCAL GOVERNMENTAL AGENCIES.

Wayne Nastri  
Acting Executive Officer

By \_\_\_\_\_  
Laki Tisopulos, Ph.D., P.E.  
Deputy Executive Officer  
Engineering and Permitting

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### TABLE OF CONTENTS

Section	Description	Revision #	Date Issued
A	Facility Information	DRAFT	07/05/2016
B	RECLAIM Annual Emission Allocation	DRAFT	07/05/2016
C	Facility Plot Plan	TO BE DEVELOPED	
D	Facility Description and Equipment Specific Conditions	DRAFT	07/05/2016
E	Administrative Conditions	DRAFT	07/05/2016
F	RECLAIM Monitoring and Source Testing Requirements	DRAFT	07/05/2016
G	Recordkeeping and Reporting Requirements for RECLAIM Sources	DRAFT	07/05/2016
H	Permit To Construct and Temporary Permit to Operate	DRAFT	07/05/2016
I	Compliance Plans & Schedules	DRAFT	07/05/2016
J	Air Toxics	DRAFT	07/05/2016
K	Title V Administration	DRAFT	07/05/2016
Appendix			
A	NOx and SOx Emitting Equipment Exempt From Written Permit Pursuant to Rule 219	DRAFT	07/05/2016
B	Rule Emission Limits	DRAFT	07/05/2016

# FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

## SECTION A: FACILITY INFORMATION

**LEGAL OWNER &/OR OPERATOR:** AMERICAN SECURITY PRODUCTS CO INC

**LEGAL OPERATOR (if different than owner):**

**EQUIPMENT LOCATION:** 11925 PACIFIC AVE  
 FONTANA, CA 92337

**MAILING ADDRESS:** 11925 PACIFIC AVE  
 FONTANA, CA 92337-6963

**RESPONSIBLE OFFICIAL:** JOHN SOLER

**TITLE:** VICE-PRESIDENT

**TELEPHONE NUMBER:** (951) 364-9282

**CONTACT PERSON:** ROBERT STATON

**TITLE:** COMPLIANCE MANAGER

**TELEPHONE NUMBER:** (951) 751-5444

**TITLE V PERMIT ISSUED:** July 26, 2011

**TITLE V PERMIT EXPIRATION DATE:** July 25, 2016

<b>TITLE V</b>	<b>RECLAIM</b>
----------------	----------------

<b>YES</b>	<b>NOx: NO</b> <b>SOx: NO</b> <b>CYCLE: 0</b> <b>ZONE: INLAND</b>
------------	--

**FACILITY PERMIT TO OPERATE  
AMERICAN SECURITY PRODUCTS CO INC**

**SECTION B: RECLAIM ANNUAL EMISSION ALLOCATION**

NOT APPLICABLE

**FACILITY PERMIT TO OPERATE  
AMERICAN SECURITY PRODUCTS CO INC**

**SECTION C: FACILITY PLOT PLAN**

(TO BE DEVELOPED)

## **FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC**

### **Facility Equipment and Requirements (Section D)**

This section consists of a table listing all permitted equipment at the facility, facility wide requirements, all individual Permits to Construct and Permits to Operate issued to various equipment at the facility, and Rule 219-exempt equipment subject to source-specific requirements. Each permit and Rule 219-exempt equipment will list operating conditions including periodic monitoring requirements, and applicable emission limits and requirements that the equipment is subject to. Also included is the Rule origin and authority of each emission limit and permit condition.

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### PERMITTED EQUIPMENT LIST

The following is a list of all Permits to Construct and Permits to Operate at this facility:

Application Number	Permit to Operate Number	Equipment Description
317490	F12425	Cement Mixing Equipment
352258	F22952	Abrasive Blasting Cabinet
352261	F22950	Dust Collector Cartridge Type
430083	F69889	Spray Booth Paint and Solvent
480172	G06031	Plasma Arc Cutter #2
503246	G09641	Spray Booth No. 7 Paint and Solvent
504543	G09642	Spray Booth No. 8 Paint and Solvent
564923	G40759	Spray Booth No. 1 Paint and Solvent
564924	G40760	Spray Booth No. 2 Paint and Solvent
564925	G40762	Spray Booth No. 3 Paint and Solvent
564926	G40763	Spray Booth No. 4 Paint and Solvent
564927	G40764	Abrasive Blasting Room
564928	G40765	Dust Collector Cartridge Type
582699		Abrasive Blasting Room
582700		Dust Collector Cartridge Type

**Note:** Equipment listed above that have no corresponding permits to operate number are issued permits to construct. The issuance or denial of their permits to operate is subject to engineering final review. Any other applications that are still being processed and have not been issued permits to construct or permits to operate will not be found in this Title V permit.

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### FACILITY WIDE CONDITION(S)

#### Condition(s):

1. Except for open abrasive blasting operations, the operator shall not discharge into the atmosphere from any single source of emissions whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is:
  - A. As dark or darker in shade as that designated No. 1 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 subparagraph (a) of this condition.  
[Rule 401]
2. The total quantity of Volatile Organic Compound (VOC) emissions from this facility shall not exceed 4,080 pounds in any one calendar month.  
[Rule 1303(b)(2)-Offset]
3. To maintain exemption from the Rule 1132 requirements, the total quantity of VOC emissions from this facility shall not exceed 20 tons (40,000 pounds) in any emission inventory year. The emission inventory year shall be the annual emission reporting period beginning from July 1 of the previous year through June 30 of a given year. By July 15, 2005 and July 15 of every year thereafter, the operator shall total and record VOC emissions from the facility for the emission inventory year. If the total facility VOC emissions from the monthly records for the emission inventory year exceed the emission cap of this condition, the operator shall submit appropriate applications and achieve compliance pursuant to the requirements specified in Rule 1132. Exceedance of the VOC emission limit of this condition shall not subject this facility to New Source Review requirements if the operator complies with the VOC emission limit specified in facility wide condition No. 2.  
[Rule 1132]
4. To ensure compliance with the emission caps of this permit, the facility operator shall:
  - A. Comply with Rule 109 (Recordkeeping for Volatile Organic Compound Emissions).
  - B. Within 14 calendar days after the end of each calendar month, total and record VOC emissions for the calendar month from all equipment and operations that are required to have written permits or are exempt from written permits pursuant to Rule 219. The record shall include any procedures used to account for control device efficiencies and/or waste disposal. It shall be signed and certified for accuracy by the highest ranking individual responsible for compliance with District rules.

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

- C. Maintain a single list that includes only the name and address of each person from whom the facility acquired VOC-containing material regulated by the District that was used or stored at the facility during the preceding 12 months.
  - D. Retain all purchase invoices for all VOC-containing material used or stored at the facility, and all waste manifests for all waste VOC-containing material removed from the facility.  
[Rule 109, 1303(b)(2)-Offset]
5. To maintain exemption from the National Emission Standards for Hazardous Air Pollutants (NESHAP) requirements, the total quantity of Hazardous Air Pollutant (HAP) emissions from this facility shall not exceed 10 tons (20,000 pounds) of a single HAP or 25 tons (50,000 pounds) of a combination of HAP(s) in any twelve calendar month period.  
[40 CFR Part 63 Subpart Mmmm]
6. To ensure compliance with the HAP(s) emission caps, the facility operator shall:
- (A) In addition to the recordkeeping requirements of Rule 109, keep adequate records for this equipment and this facility to verify the monthly HAP emissions in pounds and the HAP content of each material as applied (including water and exempt compounds). The records shall be prepared in a format which is acceptable to the District.
  - (B) Within 14 calendar days after the end of each month, total and record HAP emissions for the month from all equipment and operations that are required to have written permits or are exempt from written permits pursuant to Rule 219. The record shall include any procedures used to account for control device efficiencies and/or waste disposal. It shall be signed and certified for accuracy by the highest ranking individual responsible for compliance with District rules.
  - (C) Maintain a single list which includes only the name and address of each person from whom the facility acquired HAP-containing material regulated by the District that was used or stored at the facility during the preceding 12 months.
  - (D) Retain all purchase invoices for all HAP-containing material used or stored at the facility, and all waste manifests for all waste HAP-containing material removed from the facility, for five years.  
[40 CFR 63 Subpart Mmmm]
7. All records required by this permit shall be prepared in a format that is acceptable to the District, shall be retained on the premises for at least five years and shall be made available to any District representative upon request.  
[Rule 109, 1303(b)(2)-Offset, 40 CFR 63 Subpart Mmmm]
8. Safety Data Sheets for all materials used at this facility and subject to District rules shall be kept current and made available to District personnel upon request.  
[Rule 109, 1303(b)(2)-Offset]

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### PERMIT TO OPERATE

Permit No. F12425  
A/N 317490

#### Equipment Description:

Cement Mixing Equipment, Continuous Production Type, Cement Tech, Model No. SCD4.5 100 H., Material Capacity of 4.5 Cubic Yards, consisting of:

1. Sand and Stone Hopper with Capacity of 125 Cubic Feet;
2. Cement Bin, with Capacity of 50 Cubic Feet, Top Loaded, with Bin Cover; and
3. Homogenizing Mixer, 10 Feet Long, 9 Inch Diameter with a Hydraulic Hoist, and a 2 Foot Long Discharge Chute.

#### Conditions:

1. Operation of this equipment shall be conducted in accordance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.  
[Rule 204]
2. This equipment shall be properly maintained and kept in good operating condition at all times.  
[Rule 204]
3. The total quantity of cement used by this equipment shall not exceed 182,500 pounds in any one calendar month.  
[Rule 1303(b)(2)-Offset]
4. Within 14 calendar days after the end of each month, the operator shall total and record cement usage for the month from all equipment and operations covered by the monthly limit. It shall be signed and certified for accuracy by the highest ranking individual responsible for compliance with District rules.  
[Rule 1303(b)(2)-Offset]
5. The operator shall maintain a single list which includes only the name and address of each person from whom the facility acquired cement that was used or stored at the facility during the preceding 12 months.  
[Rule 1303(b)(2)-Offset]

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

6. The operator shall retain all purchase invoices for all cement used or stored at the facility.  
[Rule 1303(b)(2)-Offset]
7. All records required by this permit shall be retained at the facility for five years, and shall be made available to any District representative upon request.  
[Rule 1303(b)(2)-Offset]

### **Periodic Monitoring:**

8. The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on a quarterly basis, at least, unless the equipment did not operate during the entire quarterly period. The routine quarterly inspection shall be conducted while the equipment is in operation and during daylight hours.

If any visible emissions (not including condensed water vapor) are detected that last more than three minutes in any one-hour, the operator shall verify and certify within 24 hours that the equipment causing the emission and any associated air pollution control equipment are operating normally according to their design and standard procedures and under the same conditions under which compliance was achieved in the past, and either:

- A. Take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit; or
- B. Have a CARB-certified smoke reader determine compliance with the opacity standard, using EPA Method 9 or the procedures in the CARB Manual "Visible Emission Evaluation", within three business days and report any deviations to AQMD.

The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

- A. Stack or emission point identification;
- B. Description of any corrective actions taken to abate visible emissions;
- C. Date and time visible emission was abated; and
- D. Visible emission observation recorded by a certified smoke reader.

[Rule 3004 (a)(4)]

### **Emissions and Requirements:**

9. This equipment is subject to the applicable requirements of the following rules and regulations:  
PM Rule 405, see Appendix B for emission limits

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### PERMIT TO OPERATE

Permit No. F22952  
A/N 352258

#### Equipment Description:

Abrasive Blasting System, consisting of:

1. Cabinet, GOFF, 9'-2" W. x 7'-11" L. x 14'-0" H., External Dimensions, 60" Dia. Table.
2. Three Blast Wheels, 10 HP. each.

#### Conditions:

1. Operation of this equipment shall be conducted in accordance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.  
[Rule 204]
2. This equipment shall be properly maintained and kept in good operating condition at all times.  
[Rule 204]
3. This equipment shall not be operated unless it is vented to air pollution control equipment, which is in full use and which has been issued a valid permit by the Executive Officer.  
[Rule 1303(a)(1)-BACT]
4. The materials processed in this equipment shall not contain any carcinogenic/toxic compounds identified in Rule 1401, Table I, with an effective date of March 12, 1999 or earlier, except chromium, nickel, and arsenic as specified in condition No. 5.  
[Rule 1401]
5. The metal processed in this equipment shall not contain more than the following:
  - A. Chromium 0.18% by weight
  - B. Nickel 0.19% by weight
  - C. Arsenic 0.03% by weight  
[Rule 1401]

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### Periodic Monitoring:

6. The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on an annual basis, at least, unless the equipment did not operate during the entire annual period. The routine annual inspection shall be conducted while the equipment is in operation and during daylight hours.

If any visible emissions (not including condensed water vapor) are detected that last more than three minutes in any one-hour, the operator shall verify and certify within 24 hours that the equipment causing the emission and any associated air pollution control equipment are operating normally according to their design and standard procedures and under the same conditions under which compliance was achieved in the past, and either:

- A. Take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit; or
- B. Have a CARB-certified smoke reader determine compliance with the opacity standard, using EPA Method 9 or the procedures in the CARB Manual "Visible Emission Evaluation", within three business days and report any deviations to AQMD.

The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

- A. Stack or emission point identification;
  - B. Description of any corrective actions taken to abate visible emissions;
  - C. Date and time visible emission was abated; and
  - D. Visible emission observation recorded by a certified smoke reader.
- [Rule 3004 (a)(4)]

### Emissions and Requirements:

7. This equipment is subject to the applicable requirements of the following rules and regulations:

PM: Rule 405, see Appendix B for emission limits  
PM: Rule 1140, see Appendix B for emission limits  
HAPs: 40CFR63 Subpart XXXXXX, see Section J for requirements

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### PERMIT TO OPERATE

Permit No. F22950  
A/N 352261

#### Equipment Description:

Air Pollution Control System, consisting of:

1. Dust Collector, Cartridge Type, Dust Hog, Model No. FJL 4-5, 3'-10" W. x 4'-10" L. x 11'-3" H., with 4 Cartridges, 1,100 Sq. Feet of Filter Area, and Reverse Pulse Jet Cartridge Cleaning.
2. Exhaust System with a 5 HP Blower Venting One Abrasive Blasting Cabinet.

#### Conditions:

1. Operation of this equipment shall be conducted in accordance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.  
[Rule 204]
2. This equipment shall be properly maintained and kept in good operating condition at all times.  
[Rule 204]
3. Dust collected in this equipment shall be discharged only into closed containers.  
[Rule 1303(a)(1)-BACT]
4. A magnehelic gauge shall be installed and maintained so as to indicate in inches water column, the static pressure differential across the filters.  
[Rule 1303(a)(1)-BACT]

#### Periodic Monitoring:

5. The operator shall perform an annual inspection of the equipment and filter media for leaks, broken or torn filter media and improperly installed filter media. The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):
  - A. The name of the person performing the inspection and/or maintenance of the filter media;
  - B. The date, time and results of the inspection; and
  - C. The date, time and description of any maintenance or repairs resulting from the inspection.  
[Rule 3004(a) (4)]

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

6. The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on a quarterly basis, at least, unless the equipment did not operate during the entire quarterly period. The routine quarterly inspection shall be conducted while the equipment is in operation and during daylight hours. If any visible emissions (not including condensed water vapor) are detected, the operator shall take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit.

The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

- A. Stack or emission point identification;
- B. Description of any corrective actions taken to abate visible emissions; and
- C. Date and time visible emission was abated.

[Rule 3004 (a)(4)]

### **Emissions and Requirements:**

7. This equipment is subject to the applicable requirements of the following rules and regulations:

PM: 0 percent opacity, Rule 1155

PM: Rule 1155

PM: Rule 404, see Appendix B for emission limits

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### PERMIT TO OPERATE

Permit No. F69889  
A/N 430083

#### Equipment Description:

Spray Booth, M.S. Industrial Sheet Metal Inc., Custom Made, Floor Type, 10'-0" W. x 10'-6" D. x 7'-0" H., with One 120" x 48" Blanket Exhaust Filter and One 5 HP Exhaust Fan.

#### Conditions:

1. Operation of this equipment shall be conducted in accordance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.  
[Rule 204]
2. This equipment shall be properly maintained and kept in good operating condition at all times.  
[Rule 204]
3. This spray booth shall not be operated unless all exhaust air passes through filter media at least 2 inches thick.  
[Rule 1303(a)(1)-BACT]
4. A gauge shall be installed to indicate, in inches of water, the static pressure differential across the exhaust filters. In operation, the pressure differential shall not exceed 0.25 inch of water.  
[Rule 1303(a)(1)-BACT]
5. The coatings and solvents used in this equipment shall not contain any VOC.  
[Rule 1303(b)(2)-Offset]
6. Materials used in this equipment shall not contain any toxic air contaminants identified in Rule 1401, Table I, with an effective date of August 13, 1999 or earlier, except ammonia.  
[Rule 1401]
7. In addition to the recordkeeping requirements of Rule 109, the operator shall keep adequate records for this equipment to verify the calendar monthly VOC emissions in pounds and the VOC content of each material as applied (including water and exempt compounds). These records shall be prepared in a format which is acceptable to the District.  
[Rule 109, 1303(b)(2)-Offset]

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### Periodic Monitoring:

8. The operator shall determine and record the pressure differential across the filters being monitored once every week.  
[Rule 3004(a)(4)]
  
9. The operator shall perform a weekly inspection of the equipment and filter media for leaks, broken or torn filter media and improperly installed filter media. The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):
  - A. The name of the person performing the inspection and/or maintenance of the filter media;
  - B. The date, time and results of the inspection; and
  - C. The date, time and description of any maintenance or repairs resulting from the inspection.[Rule 3004 (a)(4)]

### Emissions and Requirements:

10. This equipment is subject to the applicable requirements of the following rules and regulations:  
  
VOC: Rule 1168, see Appendix B for emission limits  
VOC: Rule 1171, see Appendix B for emission limits  
VOC Rule 109  
PM Rule 481  
PM Rule 404, see Appendix B for emission limits

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### PERMIT TO OPERATE

Permit No. G6031  
A/N 480172

#### Equipment Description:

Plasma Arc Cutting System, consisting of:

1. Plasma Cutter, System No. 2, Hypertherm, Model No. HPR260, Electrically Powered, 45.5 kW.
2. Plasma Cutting Table, Two Sections, each 5'-11.5" W. x 13'-0.75" L. x 2'-10" H., Containing 715 Gallons of Coolant in each Section.

#### Conditions:

1. Operation of this equipment shall be conducted in accordance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.  
[Rule 204]
2. This equipment shall be properly maintained and kept in good operating condition at all times.  
[Rule 204]
3. The equipment shall not be operated more than 17 hours in any one day.  
[Rule 1303(a)(1)-BACT]
4. The plasma arc cutting in this equipment shall be semidry, such that liquid surface shall be present under the plate within 55 millimeter distance.  
[Rule 1303(a)(1)-BACT]
5. The coolant that is used in this equipment shall not contain any toxic air contaminants identified in Rule 1401, Table I, with effective date March 7, 2008 earlier, except ethylene glycol.  
[Rule 1401]

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

6. The materials that are cut in this equipment shall not contain any toxic air contaminants identified in Rule 1401, Table I, with effective date march 7, 2008 or earlier, except chromium & chromium compounds, nickel & nickel compounds, manganese & manganese compounds and copper & copper compounds, which are not more than the following:

Chromium & Copper Compounds	0.20% by weight
Nickel & Nickel Compounds	0.15% by weight
Copper & Copper Compounds	0.30% by weight
Manganese & Manganese Compounds	1.0% by weight

[Rule 1401]

7. The total quantity of VOC emissions from this equipment shall be less than 1 pound in any one day.  
[Rule 1303(b)(2)-Offset]
8. The operator shall keep adequate records for this equipment to demonstrate compliance with condition numbers 3, 6 and 7.  
[Rule 1303(a)(1)-BACT, 1303(b)(2)-Offset, 1401]
9. In addition to the recordkeeping requirements in Rule 109, the operator shall keep adequate records for this equipment to verify the daily VOC emissions in pounds and the VOC content of material used (including water and exempt compounds).  
[Rule 109, 1303(b)(2)-Offset]

### **Periodic Monitoring:**

10. The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on an annual basis, at least, unless the equipment did not operate during the entire annual period. The routine annual inspection shall be conducted while the equipment is in operation and during daylight hours.

If any visible emissions (not including condensed water vapor) are detected that last more than three minutes in any one-hour, the operator shall verify and certify within 24 hours that the equipment causing the emission and any associated air pollution control equipment are operating normally according to their design and standard procedures and under the same conditions under which compliance was achieved in the past, and either:

- A. Take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit; or

## **FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC**

- B. Have a CARB-certified smoke reader determine compliance with the opacity standard, using EPA Method 9 or the procedures in the CARB Manual “Visible Emission Evaluation”, within three business days and report any deviations to AQMD.

The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

- A. Stack or emission point identification;
  - B. Description of any corrective actions taken to abate visible emissions;
  - C. Date and time visible emission was abated; and
  - D. Visible emission observation recorded by a certified smoke reader.
- [Rule 3004 (a)(4)]

### **Emissions and Requirements:**

11. This equipment is subject to the applicable requirements of the following rules and regulations:

PM Rule 405, see Appendix B for emission limits

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### PERMIT TO OPERATE

Permit No. G9641  
A/N 503246

#### Equipment Description:

Spray Booth No. 7, Floor Type, Spray Tech, Model No. SDD-SE48, 16'-8.75" W. x 24'-0.312" L. x 13'-9" H., with Twenty 20" x 20" Exhaust Filters, Two 3 H. P. Exhaust Fans and One 1,000,000 BTU/hr Natural Gas-Fired Heater.

#### Conditions:

1. Operation of this equipment shall be conducted in accordance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.  
[Rule 204]
2. This equipment shall be properly maintained and kept in good operating condition at all times.  
[Rule 204]
3. This spray booth shall not be operated unless all exhaust air passes through filter media at least 2 inches thick.  
[Rule 1303(a)(1)-BACT]
4. A gauge shall be installed to indicate, in inches of water, the static pressure differential across the exhaust filters. In operation, the pressure differential shall not exceed 0.25 inch of water.  
[Rule 1303(a)(1)-BACT]
5. Powder coatings shall not be applied in this equipment.  
[Rule 1303(a)(1)-BACT]
6. The total quantity of Volatile Organic Compound (VOC) emissions from spray booth No. 7 and spray booth No. 8 shall not exceed 850 pounds in any one calendar month.  
Rule 1303(a)(1)-BACT, 1303(b)(2)-Offset]
7. The materials used in this equipment shall not contain any carcinogenic air contaminants identified in Rule 1401, Table I, with effective date June 5, 2009 or earlier.  
[Rule 1401]
8. This equipment shall not use more than 7,692 cubic feet of natural gas in any one day.

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

[Rule 1303(a)(1)-BACT]

9. A non-resettable totalizing fuel meter shall be installed and maintained to verify compliance with condition No. 8. In case the facility main gas meter is used to verify the compliance with condition No. 8, then the total natural gas usage at the entire facility shall not exceed 7,692 cubic feet in any one day.

[Rule 1303(a)(1)-BACT]

10. The operator shall maintain a fuel usage log to demonstrate compliance with condition No. 8. The log shall include, at a minimum, the date the spray booth is operated, the meter readings at the beginning and at the end of the operation, and the daily fuel usage. If the facility main gas meter is used to verify compliance, readings at the start and end of each work day shall be recorded.

[Rule 1303(a)(1)-BACT]

11. In addition to the recordkeeping requirements of Rule 109, the operator shall keep adequate records for this equipment to verify the calendar monthly VOC emissions in pounds and the VOC content of each material as applied (including water and exempt compounds). These records shall be prepared in a format which is acceptable to the District.

[Rule 109, 1303(b)(2)-Offset]

12. This equipment is subject to the applicable requirements of Rule 1147. Prior to modification of this equipment to come into compliance with the emission limit of this Rule, the operator shall submit an application and receive approval for construction or modification of the equipment.

[Rule 1147]

### **Periodic Monitoring:**

13. The operator shall determine and record the pressure differential across the filters being monitored once every week.

[Rule 3004(a)(4)]

14. The operator shall perform a weekly inspection of the equipment and filter media for leaks, broken or torn filter media and improperly installed filter media. The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):
- A. The name of the person performing the inspection and/or maintenance of the filter media;
  - B. The date, time and results of the inspection; and
  - C. The date, time and description of any maintenance or repairs resulting from the inspection.

[Rule 3004 (a)(4)]

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### **Emissions and Requirements:**

15. This equipment is subject to the applicable requirements of the following rules and regulations:

VOC: Rule 1107, see Appendix B for emission limits  
VOC: Rule 1171, see Appendix B for emission limits  
VOC Rule 109  
PM Rule 481  
PM Rule 404, see Appendix B for emission limits  
PM: 0.1 gr/scf, Rule 409  
CO: 2000 PPMV, Rule 407  
NOX: 30 PPMV, Rule 1147

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### PERMIT TO OPERATE

Permit No. G9642  
A/N 504543

#### Equipment Description:

Spray Booth No. 8, Floor Type, Spray Tech, Model No. SDD-SE48, 16'-8.75" W. x 24'-0.312" L. x 13'-9" H., with Twenty 20" x 20" Exhaust Filters, Two 3 H. P. Exhaust Fans and One 1,000,000 BTU/hr Natural Gas-Fired Heater.

#### Conditions:

1. Operation of this equipment shall be conducted in accordance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.  
[Rule 204]
2. This equipment shall be properly maintained and kept in good operating condition at all times.  
[Rule 204]
3. This spray booth shall not be operated unless all exhaust air passes through filter media at least 2 inches thick.  
[Rule 1303(a)(1)-BACT]
4. A gauge shall be installed to indicate, in inches of water, the static pressure differential across the exhaust filters. In operation, the pressure differential shall not exceed 0.25 inch of water.  
[Rule 1303(a)(1)-BACT]
5. Powder coatings shall not be applied in this equipment.  
[Rule 1303(a)(1)-BACT]
6. The total quantity of Volatile Organic Compound (VOC) emissions from spray booth No. 7 and spray booth No.8 shall not exceed 850 pounds in any one calendar month.  
[Rule 1303(a)(1)-BACT, 1303(b)(2)-Offset]
7. The materials used in this equipment shall not contain any carcinogenic air contaminants identified in Rule 1401, Table I, with effective date June 5, 2009 or earlier.  
[Rule 1401]

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

8. This equipment shall not use more than 7,692 cubic feet of natural gas in any one day.  
[Rule 1303(a)(1)-BACT]
9. A non-resettable totalizing fuel meter shall be installed and maintained to verify compliance with condition No. 8. In case the facility main gas meter is used to verify the compliance with condition No. 8, then the total natural gas usage at the entire facility shall not exceed 7,692 cubic feet in any one day.  
[Rule 1303(a)(1)-BACT]
10. The operator shall maintain a fuel usage log to demonstrate compliance with condition No. 8. The log shall include, at a minimum, the date the spray booth is operated, the meter readings at the beginning and at the end of the operation, and the daily fuel usage. If the facility main gas meter is used to verify compliance, readings at the start and end of each work day shall be recorded.  
[Rule 1303(a)(1)-BACT]
11. In addition to the recordkeeping requirements of Rule 109, the operator shall keep adequate records for this equipment to verify the calendar monthly VOC emissions in pounds and the VOC content of each material as applied (including water and exempt compounds). These records shall be prepared in a format which is acceptable to the District.  
[Rule 109, 1303(b)(2)-Offset]
12. This equipment is subject to the applicable requirements of Rule 1147. Prior to modification of this equipment to come into compliance with the emission limit of this Rule, the operator shall submit an application and receive approval for construction or modification of the equipment.  
[Rule 1147]

### **Periodic Monitoring:**

13. The operator shall determine and record the pressure differential across the filters being monitored once every week.  
[Rule 3004(a)(4)]
14. The operator shall perform a weekly inspection of the equipment and filter media for leaks, broken or torn filter media and improperly installed filter media. The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):
  - A. The name of the person performing the inspection and/or maintenance of the filter media;
  - B. The date, time and results of the inspection; and

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

C. The date, time and description of any maintenance or repairs resulting from the inspection.  
[Rule 3004 (a)(4)]

### **Emissions and Requirements:**

15. This equipment is subject to the applicable requirements of the following rules and regulations:

VOC: Rule 1107, see Appendix B for emission limits

VOC: Rule 1171, see Appendix B for emission limits

VOC Rule 109

PM Rule 481

PM Rule 404, see Appendix B for emission limits

PM: 0.1 gr/scf, Rule 409

CO: 2000 PPMV, Rule 407

NOX: 30 PPMV, Rule 1147

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### PERMIT TO OPERATE

Permit No. G40759  
A/N 564923

#### Equipment Description:

Spray Booth No. 1, Spray King, Automotive Type, Model 200-FAF, 14'-0" W. x 9'-6" H. x 50'-0" D., with Eighteen 20" x 20" Exhaust Filters, a 5 HP (12,000 cfm) Exhaust Fan, and a Spray-Tech, M1LN Series Make-Up Air Unit, with a 1,000,000 BTU/Hr, Midco Model No. LNB 1000, Low NOx Natural Gas-Fired Burner.

#### Conditions:

1. Operation of this equipment shall be conducted in accordance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.  
[Rule 204]
2. This equipment shall be properly maintained and kept in good operating condition at all times.  
[Rule 204]
3. This spray booth shall not be operated unless all exhaust air passes through filter media at least 2 inches thick.  
[Rule 1303(a)(1)-BACT]
4. A gauge shall be installed to indicate, in inches of water, the static pressure differential across the exhaust filters. In operation, the pressure differential shall not exceed 0.25 inch of water.  
[Rule 1303(a)(1)-BACT]
5. Powder coatings shall not be applied in this equipment.  
[Rule 1303(a)(1)-BACT]
6. The total quantity of Volatile Organic Compound (VOC) emissions from this equipment shall not exceed 68 pounds in any one day.  
[Rule 1303(b)(2)-Offset]
7. Coatings, reducers, clean up solvents, and any other materials used in this equipment shall not contain any compound identified as carcinogenic air contaminants in District Rule 1401, Table I, with an effective date of December 7, 1990 or earlier.  
[Rule 1401]

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

8. In addition to the recordkeeping requirements of Rule 109, the operator shall keep adequate records for this equipment to verify the daily and calendar monthly VOC emissions in pounds and the VOC content of each material as applied (including water and exempt compounds). These records shall be prepared in a format which is acceptable to the District.  
[Rule 109, 1303(b)(2)-Offset]

### **Periodic Monitoring:**

9. The operator shall determine and record the pressure differential across the filters being monitored once every week.  
[Rule 3004(a)(4)]
10. The operator shall perform a weekly inspection of the equipment and filter media for leaks, broken or torn filter media and improperly installed filter media. The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):
- A. The name of the person performing the inspection and/or maintenance of the filter media;
  - B. The date, time and results of the inspection; and
  - C. The date, time and description of any maintenance or repairs resulting from the inspection.
- [Rule 3004 (a)(4)]

### **Emissions and Requirements:**

11. This equipment is subject to the applicable requirements of the following rules and regulations:

VOC: Rule 1107, see Appendix B for emission limits  
VOC: Rule 1171, see Appendix B for emission limits  
VOC Rule 109  
PM Rule 481  
PM Rule 404, see Appendix B for emission limits  
PM: 0.1 gr/scf, Rule 409  
CO: 2000 PPMV, Rule 407  
NOX: 30 PPMV, Rule 1147

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### PERMIT TO OPERATE

Permit No. G40760  
A/N 564924

#### Equipment Description:

Spray Booth No. 2, Spray King, Automotive Type, Model 200-FAF, 14'-0" W. x 9'-6" H. x 45'-0" D., with Eighteen 20" x 20" Exhaust Filters, a 5 HP (12,000 cfm) Exhaust Fan, and a Spray-Tech, M1LN Series Make-Up Air Unit, with a 1,000,000 BTU/Hr, Midco Model No. LNB 1000, Low NOx Natural Gas-Fired Burner.

#### Conditions:

1. Operation of this equipment shall be conducted in accordance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.  
[Rule 204]
2. This equipment shall be properly maintained and kept in good operating condition at all times.  
[Rule 204]
3. This spray booth shall not be operated unless all exhaust air passes through filter media at least 2 inches thick.  
[Rule 1303(a)(1)-BACT]
4. A gauge shall be installed to indicate, in inches of water, the static pressure differential across the exhaust filters. In operation, the pressure differential shall not exceed 0.25 inch of water.  
[Rule 1303(a)(1)-BACT]
5. Powder coatings shall not be applied in this equipment.  
[Rule 1303(a)(1)-BACT]
6. The total quantity of Volatile Organic Compound (VOC) emissions from this equipment shall not exceed 68 pounds in any one day.  
[Rule 1303(b)(2)-Offset]
7. Coatings, reducers, clean up solvents, and any other materials used in this equipment shall not contain any compound identified as carcinogenic air contaminants in District Rule 1401, Table I, with an effective date of December 7, 1990 or earlier.  
[Rule 1401]

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

8. In addition to the recordkeeping requirements of Rule 109, the operator shall keep adequate records for this equipment to verify the daily and calendar monthly VOC emissions in pounds and the VOC content of each material as applied (including water and exempt compounds). These records shall be prepared in a format which is acceptable to the District.  
[Rule 109, 1303(b)(2)-Offset]

### **Periodic Monitoring:**

9. The operator shall determine and record the pressure differential across the filters being monitored once every week.  
[Rule 3004(a)(4)]
10. The operator shall perform a weekly inspection of the equipment and filter media for leaks, broken or torn filter media and improperly installed filter media. The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):
- A. The name of the person performing the inspection and/or maintenance of the filter media;
  - B. The date, time and results of the inspection; and
  - C. The date, time and description of any maintenance or repairs resulting from the inspection.
- [Rule 3004 (a)(4)]

### **Emissions and Requirements:**

11. This equipment is subject to the applicable requirements of the following rules and regulations:

VOC: Rule 1107, see Appendix B for emission limits  
VOC: Rule 1171, see Appendix B for emission limits  
VOC Rule 109  
PM Rule 481  
PM Rule 404, see Appendix B for emission limits  
PM: 0.1 gr/scf, Rule 409  
CO: 2000 PPMV, Rule 407  
NOX: 30 PPMV, Rule 1147

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### PERMIT TO OPERATE

Permit No. G40762  
A/N 564925

#### Equipment Description:

Spray Booth No. 3, Spray Systems, Automotive Type, 18'-0" W. x 41'-0" L. x 10'-0" H., with Twenty Four 20" x 25" Exhaust Filters, a 7 ½ HP (12,000 cfm) Exhaust Fan, and a Spray-Tech, M1LN Series Make-Up Air Unit, with a 1,000,000 BTU/Hr, Midco Model No. LNB 1000, Low NOx Natural Gas-Fired Burner.

#### Conditions:

1. Operation of this equipment shall be conducted in accordance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.  
[Rule 204]
2. This equipment shall be properly maintained and kept in good operating condition at all times.  
[Rule 204]
3. This spray booth shall not be operated unless all exhaust air passes through filter media at least 2 inches thick.  
[Rule 1303(a)(1)-BACT]
4. A gauge shall be installed to indicate, in inches of water, the static pressure differential across the exhaust filters. In operation, the pressure differential shall not exceed 0.25 inch of water.  
[Rule 1303(a)(1)-BACT]
5. Powder coatings shall not be applied in this equipment.  
[Rule 1303(a)(1)-BACT]
6. The total quantity of Volatile Organic Compound (VOC) emissions from this equipment shall not exceed 78 pounds in any one day.  
[Rule 1303(b)(2)-Offset]
7. Coatings, reducers, clean up solvents, and any other materials used in this equipment shall not contain any compound identified as carcinogenic air contaminants in District Rule 1401, Table I, with an effective date of December 7, 1990 or earlier.  
[Rule 1401]

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

8. In addition to the recordkeeping requirements of Rule 109, the operator shall keep adequate records for this equipment to verify the daily and calendar monthly VOC emissions in pounds and the VOC content of each material as applied (including water and exempt compounds). These records shall be prepared in a format which is acceptable to the District.  
[Rule 109, 1303(b)(2)-Offset]

### **Periodic Monitoring:**

9. The operator shall determine and record the pressure differential across the filters being monitored once every week.  
[Rule 3004(a)(4)]
10. The operator shall perform a weekly inspection of the equipment and filter media for leaks, broken or torn filter media and improperly installed filter media. The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):
- A. The name of the person performing the inspection and/or maintenance of the filter media;
  - B. The date, time and results of the inspection; and
  - C. The date, time and description of any maintenance or repairs resulting from the inspection.
- [Rule 3004 (a)(4)]

### **Emissions and Requirements:**

11. This equipment is subject to the applicable requirements of the following rules and regulations:

VOC: Rule 1107, see Appendix B for emission limits  
VOC: Rule 1171, see Appendix B for emission limits  
VOC Rule 109  
PM Rule 481  
PM Rule 404, see Appendix B for emission limits  
PM: 0.1 gr/scf, Rule 409  
CO: 2000 PPMV, Rule 407  
NOX: 30 PPMV, Rule 1147

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### PERMIT TO OPERATE

Permit No. G40763  
A/N 564926

#### Equipment Description:

Spray Booth No. 4, Spray Systems, Automotive Type, 14'-0" W. x 42'-0" L. x 9'-0" H., with Twenty-Two 20" x 25" Exhaust Filters, a 3 HP (12,000 cfm) Exhaust Fan, and a Spray-Tech, M1LN Series Make-Up Air Unit, with One 1,000,000 BTU/Hr, Midco Model No. LNB 1000, Low NOx Natural Gas-Fired Burner.

#### Conditions:

1. Operation of this equipment shall be conducted in accordance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.  
[Rule 204]
2. This equipment shall be properly maintained and kept in good operating condition at all times.  
[Rule 204]
3. This spray booth shall not be operated unless all exhaust air passes through filter media at least 2 inches thick.  
[Rule 1303(a)(1)-BACT]
4. A gauge shall be installed to indicate, in inches of water, the static pressure differential across the exhaust filters. In operation, the pressure differential shall not exceed 0.25 inch of water.  
[Rule 1303(a)(1)-BACT]
5. Powder coatings shall not be applied in this equipment.  
[Rule 1303(a)(1)-BACT]
6. The total quantity of Volatile Organic Compound (VOC) emissions from this equipment shall not exceed 73 pounds in any one day.  
[Rule 1303(b)(2)-Offset]
7. Coatings, reducers, clean up solvents, and any other materials used in this equipment shall not contain any compound identified as carcinogenic air contaminants in District Rule 1401, Table I, with an effective date of December 7, 1990 or earlier.  
[Rule 1401]

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

8. In addition to the recordkeeping requirements of Rule 109, the operator shall keep adequate records for this equipment to verify the daily and calendar monthly VOC emissions in pounds and the VOC content of each material as applied (including water and exempt compounds). These records shall be prepared in a format which is acceptable to the District.  
[Rule 109, 1303(b)(2)-Offset]

### **Periodic Monitoring:**

9. The operator shall determine and record the pressure differential across the filters being monitored once every week.  
[Rule 3004(a)(4)]
10. The operator shall perform a weekly inspection of the equipment and filter media for leaks, broken or torn filter media and improperly installed filter media. The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):
- A. The name of the person performing the inspection and/or maintenance of the filter media;
  - B. The date, time and results of the inspection; and
  - C. The date, time and description of any maintenance or repairs resulting from the inspection.
- [Rule 3004 (a)(4)]

### **Emissions and Requirements:**

11. This equipment is subject to the applicable requirements of the following rules and regulations:

VOC: Rule 1107, see Appendix B for emission limits  
VOC: Rule 1171, see Appendix B for emission limits  
VOC Rule 109  
PM Rule 481  
PM Rule 404, see Appendix B for emission limits  
PM: 0.1 gr/scf, Rule 409  
CO: 2000 PPMV, Rule 407  
NOX: 30 PPMV, Rule 1147

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### PERMIT TO OPERATE

**Permit No. G40764  
A/N 564927**

#### **Equipment Description:**

Abrasive Blasting System Consisting of:

1. Abrasive Blasting Room, Surface Preparation Solutions, Model No. SPNW 151010, 15'-0" W. x 10'-0" L. x 10'-0" H.
2. Abrasive Blasting Pot, 1980 Pound Capacity.
3. One Abrasive Blasting Nozzle with a Maximum Internal Diameter of ¼".
4. Plant Air (90 cfm) with a Maximum Pressure of 100 psig.

#### **Conditions:**

1. Operation of this equipment shall be conducted in accordance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.  
[Rule 204]
2. This equipment shall be properly maintained and kept in good operating condition at all times.  
[Rule 204]
3. This equipment shall not be operated unless it is vented to air pollution control equipment, which is in full use and which has been issued a valid permit by the Executive Officer.  
[Rule 1303(a)(1)-BACT]
4. The metal parts and the abrasive media processed and used in this equipment shall not contain any carcinogenic/toxic compounds identified in Rule 1401, Table I, with an effective date of September 10, 2010 or earlier, except chromium & chromium compounds, nickel & nickel compounds, copper & copper compounds and manganese & manganese compounds, as specified in condition No. 5.  
[Rule 1401]

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

5. The metal processed in this equipment shall not contain more than the following:
- |    |                                 |                 |
|----|---------------------------------|-----------------|
| A. | Chromium & Chromium Compounds   | 0.25% by weight |
| B. | Nickel & Nickel Compounds       | 0.25% by weight |
| C. | Copper & Copper Compounds       | 0.30% by weight |
| D. | Manganese & Manganese Compounds | 1.50% by weight |
- [Rule 1401]

### **Periodic Monitoring:**

6. The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on an annual basis, at least, unless the equipment did not operate during the entire annual period. The routine annual inspection shall be conducted while the equipment is in operation and during daylight hours.

If any visible emissions (not including condensed water vapor) are detected that last more than three minutes in any one-hour, the operator shall verify and certify within 24 hours that the equipment causing the emission and any associated air pollution control equipment are operating normally according to their design and standard procedures and under the same conditions under which compliance was achieved in the past, and either:

- A. Take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit; or
- B. Have a CARB-certified smoke reader determine compliance with the opacity standard, using EPA Method 9 or the procedures in the CARB Manual "Visible Emission Evaluation", within three business days and report any deviations to AQMD.

The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

- A. Stack or emission point identification;
- B. Description of any corrective actions taken to abate visible emissions;
- C. Date and time visible emission was abated; and
- D. Visible emission observation recorded by a certified smoke reader.

[Rule 3004 (a)(4)]

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### **Emissions and Requirements:**

7. This equipment is subject to the applicable requirements of the following rules and regulations:

PM: Rule 405, see Appendix B for emission limits

PM: Rule 1140, see Appendix B for emission limits

HAPs: 40CFR63 Subpart XXXXXX, see Section J for requirements

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### PERMIT TO OPERATE

Permit No. G40765  
A/N 564928

#### Equipment Description:

Air Pollution Control System consisting of:

1. Dust Collector, Surface Preparation Solutions, Cartridge Type, Model No. MCB 6-01-s, with 8 Cartridges, 2,720 Sq. Feet of Total Filter Area, and Reverse Pulse Jet Cartridge Cleaning.
2. Exhaust System with a 5 HP Blower (6,750 scfm) Venting One Abrasive Blasting Room.

#### Conditions:

1. Operation of this equipment shall be conducted in accordance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.  
[Rule 204]
2. This equipment shall be properly maintained and kept in good operating condition at all times.  
[Rule 204]
3. Dust collected in this equipment shall be discharged only into closed containers.  
[Rule 1303(a)(1)-BACT]
4. A magnehelic gauge shall be installed and maintained so as to indicate in inches water column, the static pressure differential across the filters.  
[Rule 1303(a)(1)-BACT]
5. This equipment shall be in full use whenever the equipment it serves is in operation.  
[Rule 1303(a)(1)-BACT]

#### Periodic Monitoring:

6. The operator shall perform an annual inspection of the equipment and filter media for leaks, broken or torn filter media and improperly installed filter media. The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):
  - A. The name of the person performing the inspection and/or maintenance of the filter media;
  - B. The date, time and results of the inspection; and
  - C. The date, time and description of any maintenance or repairs resulting from the inspection.

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

[Rule 3004(a)(4)]

7. The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on a quarterly basis, at least, unless the equipment did not operate during the entire quarterly period. The routine quarterly inspection shall be conducted while the equipment is in operation and during daylight hours. If any visible emissions (not including condensed water vapor) are detected, the operator shall take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit.

The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

- A. Stack or emission point identification;
- B. Description of any corrective actions taken to abate visible emissions; and
- C. Date and time visible emission was abated.

[Rule 3004 (a)(4)]

### **Emissions and Requirements:**

8. This equipment is subject to the applicable requirements of the following rules and regulations:

PM: 0 percent opacity, Rule 1155  
PM: Rule 1155  
PM: Rule 404, see Appendix B for emission limits

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### PERMIT TO CONSTRUCT

A/N 582699  
Granted as of

#### Equipment Description:

Abrasive Blasting System Consisting Of:

1. Abrasive Blasting Room, Surface Preparation Solutions, Model No. SBNW191010, 10'-0" W. x 19'-0" L. x 10'-0" H.
2. Abrasive Blasting Pot, 1980 Pound Capacity.
3. One Abrasive Blasting Nozzle with a Maximum Internal Diameter of ¼ Inch.
4. Plant Air with a Maximum Pressure of 100 psig.

#### Conditions:

1. Operation of this equipment shall be conducted in accordance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.  
[Rule 204]
2. This equipment shall be properly maintained and kept in good operating condition at all times.  
[Rule 204]
3. This equipment shall not be operated unless it is vented to air pollution control equipment which is in full use and has been issued a permit by the Executive Officer.  
[Rule 1303(a)(1)-BACT]
4. Materials processed in this equipment shall not contain any toxic air contaminants identified in Rule 1401, Table 1, with an effective date of June 5, 2015 or earlier, except for Chromium and Chromium compounds (CAS 18540-29-9), Nickel and Nickel compounds (CAS 7440-02-0), Copper and Copper compounds (CAS 7440-50-8), Manganese and Manganese compounds (CAS 7439-96-5), and Vanadium (CAS 7440-62-2) as specified in condition No.5.  
[Rule 1401]

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

5. The materials processed in this equipment shall not contain more than the following concentrations:
- |    |                                   |                 |
|----|-----------------------------------|-----------------|
| A. | Chromium and Copper Compounds     | 0.2% by weight  |
| B. | Nickel and Nickel Compounds       | 0.4% by weight  |
| C. | Copper and Copper Compounds       | 0.4% by weight  |
| D. | Manganese and Manganese Compounds | 1.65% by weight |
| E. | Vanadium                          | 0.04% by weight |
- [Rule 1401]
6. Safety Data Sheets (SDS) for all materials used at this facility and subject to District Rules shall be kept current and be made available to District personnel upon request.  
[Rule 1401]
7. Only steel grit and shots abrasive media shall be used in this equipment.  
[Rule 1303(b)(2)-Offset]
8. The operator shall keep adequate records for this equipment to verify compliance with condition number 4 and 5. All records shall be prepared in a format that is acceptable to the District, shall be retained on the premises for at least five years, and be made available to District personnel upon request.  
[Rule 1401]

### **Periodic Monitoring:**

9. The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on an annual basis, at least, unless the equipment did not operate during the entire annual period. The routine annual inspection shall be conducted while the equipment is in operation and during daylight hours.

If any visible emissions (not including condensed water vapor) are detected that last more than three minutes in any one-hour, the operator shall verify and certify within 24 hours that the equipment causing the emission and any associated air pollution control equipment are operating normally according to their design and standard procedures and under the same conditions under which compliance was achieved in the past, and either:

- A. Take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit; or

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

- B. Have a CARB-certified smoke reader determine compliance with the opacity standard, using EPA Method 9 or the procedures in the CARB manual “Visible Emission Evaluation”, within three business days and report any deviations to SCAQMD.

The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

- A. Stack or emission point identification;
- B. Description of any corrective actions taken to abate visible emissions;
- C. Date and time visible emission was abated; and
- D. Visible emission observation recorded by a certified smoke reader.

[Rule 3004(a)(4)]

### **Emissions and Requirements:**

10. This equipment is subject to the applicable requirements of the following rules and regulations:

PM: Rule 405, see Appendix B for emission limits

PM: Rule 1140, see Appendix B for emission limits

HAP: 40 CFR 63, Subpart XXXXXX, see Section J for requirements

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### PERMIT TO CONSTRUCT

**A/N 582700**  
**Granted as of**

#### **Equipment Description:**

Air Pollution Control System Consisting Of:

1. Dust Collector, Surface Preparation Solutions, Model No. MCB 6-01-s, with 8 Cartridge Filters, 2,720 Sq. Feet of Total Filter Area, and Reverse Pulse Jet Cartridge Cleaning.
2. Exhaust System with a 5 HP Blower (6,750 scfm) Venting an Abrasive Blasting Room.

#### **Conditions:**

1. Operation of this equipment shall be conducted in accordance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.  
[Rule 204]
2. This equipment shall be properly maintained and kept in good operating condition at all times.  
[Rule 204]
3. A mechanical gauge shall be installed and maintained so as to indicate, in inches of water column, the static pressure differential across the cartridge filter. In operation, the differential pressure across the filters shall not be less than 1.0 inch of water and not exceed 5.0 inches of water column.  
[Rule 1303(a)(1)-BACT]
4. The operator shall determine and record the pressure drop across the cartridges once every week.  
[Rule 3004(a)(4)]
5. Dust collected in the dust collector shall be discharged only into closed containers and shall not be handled in a manner that may result in the release of collected materials to the atmosphere.  
[Rule 1303(a)(1)-BACT]

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

6. This equipment shall be in full use whenever the equipment it serves is in operation.  
[Rule 1303(a)(1)-BACT]

### **Periodic Monitoring:**

7. The operator shall perform an annual inspection of the equipment and filter media for leaks, broken or torn filter media and improperly installed filter media. The operator shall keep records in a manner approved by the District, for the following parameter(s) or item(s):
- A. The name of the person performing the inspection and/or maintenance of the filter media;
  - B. The date, time and results of the inspection; and
  - C. The date, time and description of any maintenance or repairs resulting from the inspection.
- [Rule 3004(a)(4)]

8. The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on a quarterly basis, at least, unless the equipment did not operate during the entire quarterly period. The routine quarterly inspection shall be conducted while the equipment is in operation and during daylight hours. If any visible emissions (not including condensed water vapor) are detected, the operator shall take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit.
- The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:
- A. Stack or emission point identification;
  - B. Description of any corrective actions taken to abate visible emissions; and
  - C. Date and time visible emission was abated.
- [Rule 3004(a)(4)]

### **Emissions and Requirements:**

9. This equipment is subject to the applicable requirements of the following rules and regulations:
- PM: 0 Percent Opacity
  - PM: Rule 1155
  - PM: Rule 404, see Appendix B for emission limits

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### RULE 219 EQUIPMENT

#### **Equipment Description:**

Rule 219 Exempt Equipment, Coating Equipment, Portable, Architectural Coatings.

#### **Periodic Monitoring:**

1. The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

For architectural applications where no thinners, reducers, or other VOC containing materials are added, maintain semi-annual records of all coatings consisting of (a) coating type, (b) VOC content as supplied in grams per liter (g/l) of materials for low-solids coatings, and (c) VOC content as supplied in g/l of coating, less water and exempt solvent, for other coating.

For other architectural applications where thinners, reducers, or other VOC containing materials are added, maintain daily records for each coating consisting of (a) coating type, (b) VOC content as applied in grams per liter (g/l) of materials used for low-solids coatings, and (c) VOC content as applied in g/l of coating, less water and exempt solvent, for other coating.

[Rule 3004 (a) (4)]

#### **Emissions and Requirements:**

2. This equipment is subject to the applicable requirements of the following rules and regulation:

VOC: Rule 1113, see Appendix B for emission limits

VOC: Rule 1171, see Appendix B for emission limits

## **FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC**

### **RULE 219 EQUIPMENT**

#### **Equipment Description:**

Rule 219 Exempt Equipment, Hand Wiping Operations.

#### **Emissions and Requirements:**

1. This equipment is subject to the applicable requirements of the following rules and regulation:

VOC: Rule 109

VOC: Rule 1171, see Appendix B for emission limits

## **FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC**

### **SECTION E: ADMINISTRATIVE CONDITIONS**

The operating conditions in this section shall apply to all permitted equipment at this facility unless superseded by condition(s) listed elsewhere in this permit.

1. The permit shall remain effective unless this permit is suspended, revoked, modified, reissued, denied, or it is expired for nonpayment of permit processing or annual operating fees. [201, 203, 209, 301]
  - a. The permit must be renewed annually by paying annual operating fees, and the permit shall expire if annual operating fees are not paid pursuant to requirements of Rule 301(d). [301(d)]
  - b. The Permit to Construct listed in Section H shall expire one year from the Permit to Construct issuance date, unless a Permit to Construct extension has been granted by the Executive Officer or unless the equipment has been constructed and the operator has notified the Executive Officer prior to the operation of the equipment, in which case the Permit to Construct serves as a temporary Permit to Operate. [202, 205]
  - c. The Title V permit shall expire as specified under Section K of the Title V permit. The permit expiration date of the Title V facility permit does not supercede the requirements of Rule 205. [205, 3004]
2. The operator shall maintain all equipment in such a manner that ensures proper operation of the equipment. [204]
3. This permit does not authorize the emissions of air contaminants in excess of those allowed by Division 26 of the Health and Safety Code of the State of California or the Rules and Regulations of the SCAQMD. This permit cannot be considered as permission to violate existing laws, ordinances, regulations, or statutes of other governmental agencies. [204]
4. The operator shall not use equipment identified in this facility permit as being connected to air pollution control equipment unless they are so vented to the identified air pollution control equipment which is in full use and which has been included in this permit. [204]

## **FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC**

### **SECTION E: ADMINISTRATIVE CONDITIONS**

5. The operator shall not use any equipment having air pollution control device(s) incorporated within the equipment unless the air pollution control device is in full operation. [204]
6. The operator shall maintain records to demonstrate compliance with rules or permit conditions that limit equipment operating parameters, or the type or quantity of material processed. These records shall be made available to SCAQMD personnel upon request and be maintained for at least five years. [204]
7. The operator shall maintain and operate all equipment to ensure compliance with all emission limits as specified in this facility permit. Compliance with emission limits shall be determined according to the following specifications, unless otherwise specified by SCAQMD rules or permit conditions: [204]
  - a. For internal combustion engines and gas turbines, measured concentrations shall be corrected to 15 percent stack-gas oxygen content on a dry basis and be averaged over a period of 15 consecutive minutes; [1110.2, 1134]
  - b. For other combustion devices, measured concentrations shall be corrected to 3 percent stack-gas oxygen content on a dry basis and be averaged over a period of 15 consecutive minutes; [1146, 1146.1, 204]
  - c. For non-combustion sources, compliance with emission limits shall be determined and averaged over a period of 60 minutes; [204]
  - d. For the purpose of determining compliance with Rule 407, carbon monoxide (CO) shall be measured on a dry basis and be averaged over 15 consecutive minutes, and sulfur compounds which would exist as liquid or gas at standard conditions shall be calculated as sulfur dioxide (SO<sub>2</sub>) and be averaged over 15 consecutive minutes; [407]
  - e. For the purpose of determining compliance with Rule 409, combustion contaminant emission measurements shall be corrected to 12 percent of carbon dioxide (CO<sub>2</sub>) at standard conditions and averaged over a minimum of 15 consecutive minutes. [409]

## **FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC**

### **SECTION E: ADMINISTRATIVE CONDITIONS**

- f. For the purpose of determining compliance with Rule 475, combustion contaminant emission measurements shall be corrected to 3 percent of oxygen (O<sub>2</sub>) at standard conditions and averaged over 15 consecutive minutes or any other averaging time specified by the Executive Officer. [475]
8. The operator shall, when a source test is required by SCAQMD, provide a source test protocol to SCAQMD no later than 60 days before the proposed test date. The test shall not commence until the protocol is approved by SCAQMD. The test protocol shall contain the following information: [204, 304]
  - a. Brief description of the equipment tested.
  - b. Brief process description, including maximum and normal operating temperatures, pressures, throughput, etc.
  - c. Operating conditions under which the test will be performed.
  - d. Method of measuring operating parameters, such as fuel rate and process weight. Process schematic diagram showing the ports and sampling locations, including the dimensions of the ducts and stacks at the sampling locations, and distances of flow disturbances, (e.g. elbows, tees, fans, dampers) from the sampling locations (upstream and downstream).
  - e. Brief description of sampling and analytical methods used to measure each pollutant, temperature, flow rates, and moisture.
  - f. Description of calibration and quality assurance procedures.
  - g. Determination that the testing laboratory qualifies as an "independent testing laboratory" under Rule 304 (conflict of interest).
9. The operator shall submit a report no later than 60 days after conducting a source test, unless otherwise required by SCAQMD rules or equipment-specific conditions. The report shall contain the following information: [204]
  - a. The results of the source test.

## **FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC**

### **SECTION E: ADMINISTRATIVE CONDITIONS**

- b. Brief description of the equipment tested.
  - c. Operating conditions under which the test was performed.
  - d. Method of measuring operating parameters, such as fuel rate and process weight. Process schematic diagram showing the ports and sampling locations, including the dimensions of the ducts and stacks at the sampling locations, and distances of flow disturbances, (e.g. elbows, tees, fans, dampers) from the sampling locations (upstream and downstream).
  - e. Field and laboratory data forms, strip charts and analyses.
  - f. Calculations for volumetric flow rates, emission rates, control efficiency, and overall control efficiency.
10. The operator shall, when a source test is required, provide and maintain facilities for sampling and testing. These facilities shall comply with the requirements of SCAQMD Source Test Method 1.1 and 1.2. [217]
  11. Whenever required to submit a written report, notification or other submittal to the Executive Officer, SCAQMD, or the District, the operator shall mail or deliver the material to: Deputy Executive Officer, Engineering and Compliance, SCAQMD, 21865 Copley Drive, Diamond Bar, CA 91765-4178. [204]

**FACILITY PERMIT TO OPERATE  
AMERICAN SECURITY PRODUCTS CO INC**

**SECTION F: RECLAIM MONITORING AND SOURCE TESTING REQUIREMENTS**

NOT APPLICABLE

**FACILITY PERMIT TO OPERATE  
AMERICAN SECURITY PRODUCTS CO INC**

**SECTION G: RECORDKEEPING AND REPORTING REQUIREMENTS FOR  
RECLAIM SOURCES**

NOT APPLICABLE

**FACILITY PERMIT TO OPERATE  
AMERICAN SECURITY PRODUCTS CO INC**

**SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE**

See Section D of this permit for any Permit to Construct issued to this facility.

# **FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC**

## **SECTION I: PLANS AND SCHEDULES**

This section lists all plans approved by AQMD for the purposes of meeting the requirements of applicable AQMD rules.

NONE

NOTE: This section does not list compliance schedules pursuant to the requirements of Regulation XXX - Title V Permits; Rule 3004(a)(10)(C). For equipment subject to a variance, order for abatement, or alternative operating condition granted pursuant to Rule 518.2, equipment specific conditions are added to the equipment in Section D or H of the permit.

**FACILITY PERMIT TO OPERATE  
AMERICAN SECURITY PRODUCTS CO INC**

**SECTION J: AIR TOXICS**

## **FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC**

### **SECTION K: TITLE V Administration**

#### **GENERAL PROVISIONS**

1. This permit may be revised, revoked, reopened and reissued, or terminated for cause, or for failure to comply with regulatory requirements, permit terms, or conditions. [3004(a)(7)(C)]
2. This permit does not convey any property rights of any sort or any exclusive privilege. [3004(a)(7)(E)]

#### **Permit Renewal and Expiration**

3. (A) Except for solid waste incineration facilities subject to standards under section 129(e) of the Clean Air Act, this permit shall expire five years from the date that this Title V permit is issued. The operator's right to operate under this permit terminates at midnight on this date, unless the facility is protected by an application shield in accordance with Rule 3002(b), due to the filing of a timely and complete application for a Title V permit renewal, consistent with Rule 3003. [3004(a)(2), 3004(f)]  
  
(B) A Title V permit for a solid waste incineration facility combusting municipal waste subject to standards under Section 129(e) of the Clean Air Act shall expire 12 years from the date of issuance unless such permit has been renewed pursuant to this regulation. These permits shall be reviewed by the Executive Officer at least every five years from the date of issuance. [3004(f)(2)]
4. To renew this permit, the operator shall submit to the Executive Officer an application for renewal at least 180 days, but not more than 545 days, prior to the expiration date of this permit. [3003(a)(6)]

#### **Duty to Provide Information**

5. The applicant for, or holder of, a Title V permit shall furnish, pursuant to Rule 3002(d) and (e), timely information and records to the Executive Officer or designee within a reasonable time as specified in writing by the Executive Officer or designee. [3004(a)(7)(F)]

#### **Payment of Fees**

6. The operator shall pay all required fees specified in Regulation III - Fees. [3004(a)(7)(G)]

## **FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC**

### **SECTION K: TITLE V Administration**

#### **Reopening for Cause**

7. The Executive Officer will reopen and revise this permit if any of the following circumstances occur:
- (A) Additional regulatory requirements become applicable with a remaining permit term of three or more years. Reopening is not required if the effective date of the requirement is later than the expiration date of this permit, unless the permit or any of its terms and conditions has been extended pursuant to paragraph (f)(4) of Rule 3004.
  - (B) The Executive Officer or EPA Administrator determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.
  - (C) The Executive Officer or EPA Administrator determines that the permit must be revised or revoked to assure compliance with the applicable requirements. [3005(g)(1)]

#### **COMPLIANCE PROVISIONS**

8. The operator shall comply with all regulatory requirements, and all permit terms and conditions, except:
- (A) As provided for by the emergency provisions of condition no. 17 or condition no. 18, or
  - (B) As provided by an alternative operating condition granted pursuant to a federally approved (SIP-approved) Rule 518.2.

Any non-compliance with any federally enforceable permit condition constitutes a violation of the Federal Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or denial of a permit renewal application. Non-compliance may also be grounds for civil or criminal penalties under the California State Health and Safety Code. [3004(a)(7)(A)]

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### SECTION K: TITLE V Administration

9. The operator shall allow the Executive Officer or authorized representative, upon presentation of appropriate credentials to:
  - (A) Enter the operator's premises where emission-related activities are conducted, or records are kept under the conditions of this permit;
  - (B) Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
  - (C) Inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
  - (D) Sample or monitor at reasonable times, substances or parameters for the purpose of assuring compliance with the facility permit or regulatory requirements. [3004(a)(10)(B)]
  
10. All terms and conditions in this permit, including any provisions designed to limit a facility's potential to emit, are enforceable by the EPA Administrator and citizens under the federal Clean Air Act, unless the term or condition is designated as not federally enforceable. Each day during any portion of which a violation occurs is a separate offense. [3004(g)]
  
11. A challenge to any permit condition or requirement raised by EPA, the operator, or any other person, shall not invalidate or otherwise affect the remaining portions of this permit. [3007(b)]
  
12. The filing of any application for a permit revision, revocation, or termination, or a notification of planned changes or anticipated non-compliance does not stay any permit condition. [3004(a)(7)(D)]
  
13. It shall not be a defense for a person in an enforcement action, including those listed in Rule 3002(c)(2), that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit, except as provided for in "Emergency Provisions" of this section. [3004(a)(7)(H)]

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### SECTION K: TITLE V Administration

14. The operator shall not build, erect, install, or use any equipment, the use of which, without resulting in a reduction in the total release of air contaminants to atmosphere, reduces or conceals an emission which would otherwise constitute a violation of Chapter 3 (commencing with Section 41700) of Part 4, of Division 26 of the California Health and Safety Code or of AQMD rules. This rule shall not apply to cases in which the only violation involved is of Section 41700 of the California Health and Safety Code, or Rule 402 of AQMD Rules. [408]
15. Nothing in this permit or in any permit shield can alter or affect:
- (A) Under Section 303 of the federal Clean Air Act, the provisions for emergency orders;
  - (B) The liability of the operator for any violation of applicable requirements prior to or at the time of permit issuance;
  - (C) The applicable requirements of the Acid Rain Program, Regulation XXXI;
  - (D) The ability of EPA to obtain information from the operator pursuant to Section 114 of the federal Clean Air Act;
  - (E) The applicability of state or local requirements that are not "applicable requirements", as defined in Rule 3000, at the time of permit issuance but which do apply to the facility, such as toxics requirements unique to the State; and
  - (F) The applicability of regulatory requirements with compliance dates after the permit issuance date. [3004(c)(3)]
16. For any portable equipment that requires an AQMD or state permit or registration, excluding a) portable engines, b) military tactical support equipment and c) AQMD-permitted portable equipment that are not a major source, are not located at the facility for more than 12 consecutive months after commencing operation, and whose operation does not conflict with the terms or conditions of this Title V permit: 1) the facility operator shall keep a copy of the AQMD or state permit or registration; 2) the equipment operator shall comply with the conditions on the permit or registration and all other regulatory requirements; and 3) the facility operator shall treat the permit or registration as a part of its Title V permit, subject to recordkeeping, reporting and certification requirements. [3004(a)(1)]

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### SECTION K: TITLE V Administration EMERGENCY PROVISIONS

17. An emergency<sup>1</sup> constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limit only if:
- (A) Properly signed, contemporaneous operating records or other credible evidence demonstrate that:
    - (1) An emergency occurred and the operator can identify the cause(s) of the emergency;
    - (2) The facility was operated properly (i.e. operated and maintained in accordance with the manufacturer's specifications, and in compliance with all regulatory requirements or a compliance plan), before the emergency occurred;
    - (3) The operator took all reasonable steps to minimize levels of emissions that exceeded emissions standard, or other requirements in the permit; and,
    - (4) The operator submitted a written notice of the emergency to the AQMD within two working days of the time when the emissions limitations were exceeded due to the emergency. The notice shall contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
  - (B) The operator complies with the breakdown provisions of Rule 430 – Breakdown Provisions, or subdivision (i) of Rule 2004 – Requirements, whichever is applicable. [3002(g), 430, 2004(i)]
18. The operator is excused from complying with any regulatory requirement that is suspended by the Executive Officer during a state of emergency or state of war emergency, in accordance with Rule 118 - Emergencies. [118]

---

<sup>1</sup> "Emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the operator, including acts of God, which: (A) requires immediate corrective action to restore normal operation; and (B) causes the facility to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency; and (C) is not caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

## **FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC**

### **SECTION K: TITLE V Administration RECORDKEEPING PROVISIONS**

19. In addition to any other recordkeeping requirements specified elsewhere in this permit, the operator shall keep records of required monitoring information, where applicable, that include:
- (A) The date, place as defined in the Title V permit, and time of sampling or measurements;
  - (B) The date(s) analyses were performed;
  - (C) The company or entity that performed the analyses;
  - (D) The analytical techniques or methods used;
  - (E) The results of such analyses; and
  - (F) The operating conditions as existing at the time of sampling or measurement. [3004(a)(4)(B)]
20. The operator shall maintain records pursuant to Rule 109 and any applicable material safety data sheet (MSDS) for any equipment claimed to be exempt from a written permit by Rule 219 based on the information in those records. [219(t)]
21. The operator shall keep all records of monitoring data required by this permit or by regulatory requirements for a period of at least five years from the date of the monitoring sample, measurement, report, or application. [3004(a)(4)(E)]

### **REPORTING PROVISIONS**

22. The operator shall comply with the following requirements for prompt reporting of deviations:
- (A) Breakdowns shall be reported as required by Rule 430 – Breakdown Provisions or subdivision (i) of Rule 2004 - Requirements, whichever is applicable.

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### SECTION K: TITLE V Administration

- (B) Other deviations from permit or applicable rule emission limitations, equipment operating conditions, or work practice standards, determined by observation or by any monitoring or testing required by the permit or applicable rules that result in emissions greater than those allowed by the permit or applicable rules shall be reported within 72 hours (unless a shorter reporting period is specified in an applicable State or Federal Regulation) of discovery of the deviation by contacting AQMD enforcement personnel assigned to this facility or otherwise calling (800) CUT-SMOG.
- (C) A written report of such deviations reported pursuant to (B), and any corrective actions or preventative measures taken, shall be submitted to AQMD, in an AQMD approved format, within 14 days of discovery of the deviation.
- (D) All other deviations shall be reported with the monitoring report required by condition no. 23. [3004(a)(5)]
23. Unless more frequent reporting of monitoring results are specified in other permit conditions or in regulatory requirements, the operator shall submit reports of any required monitoring to the AQMD at least twice per year. The report shall include a) a statement whether all monitoring required by the permit was conducted; and b) identification of all instances of deviations from permit or regulatory requirements. A report for the first six calendar months of the year is due by August 31 and a report for the last six calendar months of the year is due by February 28. [3004(a)(4)(F)]
24. The operator shall submit to the Executive Officer and to the Environmental Protection Agency (EPA), an annual compliance certification. For RECLAIM facilities, the certification is due when the Annual Permit Emissions Program (APEP) report is due and shall cover the same reporting period. For other facilities, the certification is due on March 1 for the previous calendar year. The certification need not include the period preceding the date the initial Title V permit was issued. Each compliance certification shall include:
- (A) Identification of each permit term or condition that is the basis of the certification;

## **FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC**

### **SECTION K: TITLE V Administration**

- (B) The compliance status during the reporting period;
- (C) Whether compliance was continuous or intermittent;
- (D) The method(s) used to determine compliance over the reporting period and currently, and
- (E) Any other facts specifically required by the Executive Officer to determine compliance.

The EPA copy of the certification shall be sent to: Director of the Air Division Attn:  
Air-3 USEPA, Region IX 75 Hawthorne St. San Francisco, CA 94105 [3004(a)(10)(E)]

25. All records, reports, and documents required to be submitted by a Title V operator to AQMD or EPA shall contain a certification of accuracy consistent with Rule 3003(c)(7) by a responsible official (as defined in Rule 3000). [3004(a)(12)]

### **PERIODIC MONITORING**

26. All periodic monitoring required by this permit pursuant to Rule 3004(a)(4)(c) is based on the requirements and justifications in the AQMD document "Periodic Monitoring Guidelines for Title V Facilities" or in case-by-case determinations documented in the TitleV application file. [3004(a)(4)]

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### SECTION K: TITLE V Administration

#### *FACILITY RULES*

*This facility is subject to the following rules and regulations*

With the exception of Rule 402, 473, 477, 1118 and Rules 1401 through 1420, the following rules that are designated as non-federally enforceable are pending EPA approval as part of the state implementation plan. Upon the effective date of that approval, the approved rule(s) will become federally enforceable, and any earlier versions of those rules will no longer be federally enforceable.

<b>RULE SOURCE</b>	<b>Adopted/Amended Date</b>	<b>FEDERAL Enforceability</b>
RULE 109	5-2-2003	Federally enforceable
RULE 1107	1-6-2006	Federally enforceable
RULE 1113	6-3-2011	Federally enforceable
RULE 1113	9-6-2013	Non federally enforceable
RULE 1132	3-5-2004	Federally enforceable
RULE 1132	5-7-2004	Non federally enforceable
RULE 1140	2-1-1980	Federally enforceable
RULE 1140	8-2-1985	Non federally enforceable
RULE 1147	9-9-2011	Non federally enforceable
RULE 1155	5-2-2014	Non federally enforceable
RULE 1168	1-7-2005	Federally enforceable
RULE 1171	2-1-2008	Federally enforceable
RULE 1171	5-1-2009	Non federally enforceable
RULE 118	12-7-1995	Non federally enforceable
RULE 1303(a)(1)-BACT	12-6-2002	Non federally enforceable
RULE 1303(a)(1)-BACT	5-10-1996	Federally enforceable
RULE 1303(b)(2)-Offset	12-6-2002	Non federally enforceable
RULE 1303(b)(2)-Offset	5-10-1996	Federally enforceable
RULE 1401	12-7-1990	Non federally enforceable
RULE 1401	3-12-1999	Non federally enforceable
RULE 1401	3-7-2008	Non federally enforceable
RULE 1401	6-5-2015	Non federally enforceable

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### SECTION K: TITLE V Administration

<b>RULE SOURCE</b>	<b>Adopted/Amended Date</b>	<b>FEDERAL Enforceability</b>
RULE 1401	8-13-1999	Non federally enforceable
RULE 204	10-8-1993	Federally enforceable
RULE 217	1-5-1990	Federally enforceable
RULE 219	5-3-2013	Non federally enforceable
RULE 219	9-4-1981	Federally enforceable
RULE 3002	11-14-1997	Federally enforceable
RULE 3002	11-5-2010	Non federally enforceable
RULE 3003	11-14-1997	Federally enforceable
RULE 3003	11-5-2010	Non federally enforceable
RULE 3004	12-12-1997	Federally enforceable
RULE 3004(a)(4)-Periodic Monitoring	12-12-1997	Federally enforceable
RULE 3005	11-14-1997	Federally enforceable
RULE 3005	11-5-2010	Non federally enforceable
RULE 3007	10-8-1993	Federally enforceable
RULE 304	5-1-2015	Non federally enforceable
RULE 401	11-9-2001	Non federally enforceable
RULE 401	3-2-1984	Federally enforceable
RULE 402	5-7-1976	Non federally enforceable
RULE 404	2-7-1986	Federally enforceable
RULE 405	2-7-1986	Federally enforceable
RULE 407	4-2-1982	Federally enforceable
RULE 408	5-7-1976	Federally enforceable
RULE 409	8-7-1981	Federally enforceable
RULE 430	7-12-1996	Non federally enforceable
RULE 442	12-15-2000	Federally enforceable
RULE 481	1-11-2002	Federally enforceable
RULE 701	6-13-1997	Federally enforceable
40CFR 63 Subpart MMMM	12-22-2006	Non federally enforceable
40CFR 63 Subpart XXXXXX	7-23-2008	Federally enforceable

**FACILITY PERMIT TO OPERATE  
AMERICAN SECURITY PRODUCTS CO INC**

APPENDIX A: NOX AND SOX EMITTING EQUIPMENT EXEMPT FROM WRITTEN  
PERMIT PURSUANT TO RULE 219

NONE

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### APPENDIX B: RULE EMISSION LIMITS [RULE 1107 01-06-2006]

Except as otherwise provided in Rule 1107

(1) VOC Content of Coatings

A person shall not apply to metal parts and products subject to the provisions of this rule any coatings, including any VOC-containing materials added to the original coating supplied by the manufacturer, which contain VOC in excess of the limits specified below:

<b>VOC LIMITS</b>								
<b>Less Water and Less Exempt Compounds</b>								
<b>Effective Dates</b>								
<b>Coating</b>	<b>Air-Dried</b>				<b>Baked</b>			
	<b>gm/l</b>		<b>lb/gal</b>		<b>gm/l</b>		<b>lb/gal</b>	
	<b>Current</b>	<b>7/1/07</b>	<b>Current</b>	<b>7/1/07</b>	<b>Current</b>	<b>7/1/07</b>	<b>Current</b>	<b>7/1/07</b>
General One-Component	275	275	2.3	2.3	275	275	2.3	2.3
General Multi-Component	340	340	2.8	2.8	275	275	2.3	2.3
Military Specification	340	340	2.8	2.8	275	275	2.3	2.3
Etching Filler	420	420	3.5	3.5	420	420	3.5	3.5
Solar-Absorbent	420	420	3.5	3.5	360	360	3.0	3.0
Heat-Resistant	420	420	3.5	3.5	360	360	3.0	3.0
Extreme High-Gloss	420	340	3.5	2.8	360	360	3.0	3.0
Metallic	420	420	3.5	3.5	420	420	3.5	3.5

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### APPENDIX B: RULE EMISSION LIMITS [RULE 1107 01-06-2006]

<b>VOC LIMITS</b>								
<b>Less Water and Less Exempt Compounds</b>								
<b>Effective Dates, cont.</b>								
<b>Coating</b>	<b>Air-Dried</b>				<b>Baked</b>			
	<b>gm/l</b>		<b>lb/gal</b>		<b>gm/l</b>		<b>lb/gal</b>	
	<b>Current</b>	<b>7/1/07</b>	<b>Current</b>	<b>7/1/07</b>	<b>Current</b>	<b>7/1/07</b>	<b>Current</b>	<b>7/1/07</b>
Extreme Performance	420	420	3.5	3.5	360	360	3.0	3.0
Prefabricated Architectural One-Component	420	275	3.5	2.3	275	275	2.3	2.3
Prefabricated Architectural Multi-Component	420	340	3.5	2.8	275	275	2.3	2.3
Touch Up	420	420	3.5	3.5	360	360	3.0	3.0
Repair	420	420	3.5	3.5	360	360	3.0	3.0
Silicone Release	420	420	3.5	3.5	420	420	3.5	3.5
High-Performance Architectural	420	420	3.5	3.5	420	420	3.5	3.5
Camouflage	420	420	3.5	3.5	420	420	3.5	3.5
Vacuum-Metalizing	420	420	3.5	3.5	420	420	3.5	3.5
Mold-Seal	420	420	3.5	3.5	420	420	3.5	3.5
High-Temperature	420	420	3.5	3.5	420	420	3.5	3.5
Electric-Insulating Varnish	420	420	3.5	3.5	420	420	3.5	3.5
Pan Backing	420	420	3.5	3.5	420	420	3.5	3.5
Pretreatment Coatings	420	420	3.5	3.5	420	420	3.5	3.5

## **FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC**

### **APPENDIX B: RULE EMISSION LIMITS [RULE 1107 01-06-2006]**

- (2) A person shall not use VOC-containing materials which have a VOC content of more than 200 grams per liter of material for stripping any coating governed by this rule.

## **FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC**

### **APPENDIX B: RULE EMISSION LIMITS [RULE 1113 06-03-2011]**

- (1) Except as provided in paragraphs (c)(3), (c)(4), and designated coatings averaged under (c)(6) of Rule 1113, no person shall supply, sell, offer for sale, market, manufacture, blend, repackage, apply, store at a worksite, or solicit the application of any architectural coating within the District:
  - (A) That is listed in the Table of Standards 1 and contains VOC (excluding any colorant added to tint bases) in excess of the corresponding VOC limit specified in the table, after the effective date specified; or
  - (B) That is not listed in the Table of Standards 1, and contains VOC (excluding any colorant added to tint bases) in excess of 250 grams of VOC per liter of coating (2.08 pounds per gallon), less water, less exempt compounds, until January 1, 2014, at which time the limit drops to 50 grams of VOC per liter of coating, less water, less exempt compounds (0.42 pounds per gallon).
- (2) No person within the District shall add colorant at the point of sale that is listed in the Table of Standards 2 and contains VOC in excess of the corresponding VOC limit specified in the Table of Standards 2, after the effective date specified.

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### APPENDIX B: RULE EMISSION LIMITS [RULE 1113 06-03-2011]

#### TABLE OF STANDARDS 1 VOC LIMITS

**Grams of VOC Per Liter of Coating,  
 Less Water and Less Exempt Compounds**

COATING CATEGORY	Ceiling Limit <sup>1</sup>	Current Limit <sup>2</sup>	Effective Date		
			7/1/08	1/1/12	1/1/14
Bond Breakers		350			
Clear Wood Finishes		275			
Varnish	350	275			
Sanding Sealers	350	275			
Lacquer		275			
Concrete-Curing Compounds		100			
Concrete-Curing Compounds For Roadways and Bridges <sup>3</sup>		350			
Concrete Surface Retarder		250			50
Driveway Sealer		100		50	
Dry-Fog Coatings		150			50
Faux Finishing Coatings					
Clear Topcoat		350		200	
Decorative Coatings		350			100
Glazes		350			
Japan		350			
Trowel Applied Coatings		350		150	50
Fire-Proofing Coatings		350			150
Flats	250	50	50		
Floor Coatings	100	50			
Form Release Compound		250			100
Graphic Arts (Sign) Coatings		500			150
Industrial Maintenance (IM) Coatings	420	100			
High Temperature IM Coatings		420			
Non-Sacrificial Anti-Graffiti Coatings		100			
Zinc-Rich IM Primers	340	100			
Magnesite Cement Coatings		450			
Mastic Coatings		300			100
Metallic Pigmented Coatings	500	500			150
Multi-Color Coatings		250			
Nonflat Coatings	150	50			
Pre-Treatment Wash Primers		420			
Primers, Sealers, and Undercoaters	200	100			
Reactive Penetrating Sealers		350			
Recycled Coatings		250			
Roof Coatings	250	50			
Roof Coatings, Aluminum		100			

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### APPENDIX B: RULE EMISSION LIMITS [RULE 1113 06-03-2011]

Roof Primers, Bituminous	350	350		
Rust Preventative Coatings	400	100		
Stone Consolidant		450		
Sacrificial Anti-Graffiti Coatings		100		50
Shellac				
Clear		730		
Pigmented		550		
Specialty Primers	350	100		
Stains		100		

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### APPENDIX B: RULE EMISSION LIMITS [RULE 1113 06-03-2011]

COATING CATEGORY	Ceiling Limit <sup>1</sup>	Current Limit <sup>2</sup>	Effective Date		
			7/1/08	1/1/12	1/1/14
Stains, Interior	250	250			
Swimming Pool Coatings					
Repair		340			
Other		340			
Traffic Coatings		100			
Waterproofing Sealers	250	100			
Waterproofing Concrete/Masonry Sealers	400	100			
Wood Preservatives		350			

1. The specified ceiling limits are applicable to products sold under the Averaging Compliance Option.
2. The specified limits remain in effect unless revised limits are listed in subsequent columns in the Table of Standards.
3. Does not include compounds used for curbs and gutters, sidewalks, islands, driveways and other miscellaneous concrete areas.

#### TABLE OF STANDARDS 1 (cont.) VOC LIMITS

##### Grams of VOC Per Liter of Material

COATING	Limit
Low-Solids Coating	120

#### TABLE OF STANDARDS 2 VOC LIMITS FOR COLORANTS

##### Grams of VOC Per Liter of Colorant Less Water and Less Exempt Compounds

COLORANT	Limit <sup>4</sup>
Architectural Coatings, excluding IM Coatings	50
Solvent-Based IM	600
Waterborne IM	50

4. Effective January 1, 2014.

## **FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC**

### **APPENDIX B: RULE EMISSION LIMITS [RULE 1113 09-06-2013]**

- (1) Except as provided in paragraphs (c)(3), (c)(4), and designated coatings averaged under (c)(6), no person shall supply, sell, offer for sale, market, manufacture, blend, repack, apply, store at a worksite, or solid the application of any architectural coating within in the District:
  - (A) That is listed in the Table of Standards 1 and contains VOC (excluding any colorant added to tint bases) in excess of the corresponding VOC limit specified in the table, after the effective date specified; or
  - (B) That is not listed in the Table of Standards 1, and contains VOC (excluding any colorant added to tint bases) in excess of 250 grams of VOC per liter of coating (2.08 pounds per gallon), less water, less exempt compounds, until January 1, 2014, at which time the limit drops to 50 grams of VOC per liter of coating, less water, less exempt compounds (0.42 pounds per gallon).
- (2) No person within the District shall add colorant at the point of sale that is listed in the Table of Standards 2 and contains VOC in excess of the corresponding VOC limit specified in the Table of Standards 2, after the effective date specified.

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### APPENDIX B: RULE EMISSION LIMITS [RULE 1113 09-06-2013]

#### TABLE OF STANDARDS 1 VOC LIMITS

#### Grams of VOC Per Liter of Coating, Less Water and Less Exempt Compounds

COATING CATEGORY	Ceiling Limit <sup>1</sup>	Current Limit <sup>2</sup>	Effective Date		
			7/1/08	1/1/12	1/1/14
Bond Breakers		350			
Clear Wood Finishes		275			
Varnish	350	275			
Sanding Sealers	350	275			
Lacquer		275			
Concrete-Curing Compounds		100			
Concrete-Curing Compounds For Roadways and Bridges <sup>3</sup>		350			
Concrete Surface Retarder		250			50
Driveway Sealer		100		50	
Dry-Fog Coatings		150			50
Faux Finishing Coatings					
Clear Topcoat		350		200	100
Decorative Coatings		350			
Glazes		350			
Japan		350			
Trowel Applied Coatings		350		150	50
Fire-Proofing Coatings		350			150
Flats	250	50	50		
Floor Coatings	100	50			
Form Release Compound		250			100
Graphic Arts (Sign) Coatings		500			150
Industrial Maintenance (IM) Coatings	420	100			
High Temperature IM Coatings		420			
Non-Sacrificial/Anti-Graffiti Coatings		100			
Zinc-Rich IM Primers		100			
Magnesite Cement Coatings		450			
Mastic Coatings		300			100
Metallic Pigmented Coatings	500	500			150
Multi-Color Coatings		250			
Nonflat Coatings	150	50			
Pre-Treatment Wash Primers		420			
Primers, Sealers, and Undercoaters		100			
Reactive Penetrating Sealers		350			

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### APPENDIX B: RULE EMISSION LIMITS [RULE 1113 09-06-2013]

Recycled Coatings		250			
Roof Coatings		50			
Roof Coatings, Aluminum		100			
Roof Primers, Bituminous		350			
Rust Preventative Coatings	400	100			
Sacrificial Anti-Graffiti Coatings		100		50	
Shellac					
Clear		730			

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### APPENDIX B: RULE EMISSION LIMITS [RULE 1113 09-06-2013]

COATING CATEGORY	Ceiling Limit <sup>1</sup>	Current Limit <sup>2</sup>	Effective Date		
			7/1/08	1/1/12	1/1/14
Pigmented		550			
Specialty Primers		100			
Stains	350	100			
Stains, Interior	250	250			
Stone Consolidant		450			
Swimming Pool Coatings					
Repair		340			
Other		340			
Traffic Coatings		100			
Waterproofing Sealers		100			
Waterproofing Concrete/Masonry Sealers		100			
Wood Preservatives		350			

- 1 The specified ceiling limits are applicable to products sold under the Averaging Compliance Option.
- 2 The specified limits remain in effect unless revised limits are listed in subsequent columns in the Table of Standards.
- 3 Does not include compounds used for curbs and gutters, sidewalks, islands, driveways and other miscellaneous concrete areas.

#### TABLE OF STANDARDS 1 (cont.) VOC LIMITS

##### Grams of VOC Per Liter of Material

COATING	Limit
Low-Solids Coating	120

#### TABLE OF STANDARDS 2 VOC LIMITS FOR COLORANTS

##### Grams of VOC Per Liter of Colorant Less Water and Less Exempt Compounds

COLORANT ADDED TO	Limit <sup>4</sup>
Architectural Coatings, excluding IM Coatings	50
Solvent-Based IM	600
Waterborne IM	50

4. Effective January 1, 2014.

## **FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC**

### **APPENDIX B: RULE EMISSION LIMITS [RULE 1140 02-01-1980]**

- (1) The operator shall not, if he complies with an applicable performance standard in section (b)(4) of Rule 1140, discharge into the atmosphere from any abrasive blasting any air contaminant for a period or periods aggregating more than three 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 (1)(A).
- (2) The operator shall not, if he is not complying with an applicable performance standard in section (b)(4) of Rule 1140, discharge into the atmosphere from any abrasive blasting any air contaminant for a period or periods aggregating more than three minutes in any one hour which is:
  - (A) As dark or darker in shade as that designated as No. 1 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 (2)(A).

## **FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC**

### **APPENDIX B: RULE EMISSION LIMITS [RULE 1140 08-02-1985]**

- (1) The operator shall not, if he complies with an applicable performance standard in section (b)(4) of Rule 1140, discharge into the atmosphere from any abrasive blasting any air contaminant for a period or periods aggregating more than three 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 (1)(A).
  
- (2) The operator shall not, if he is not complying with an applicable performance standard in section (b)(4) of Rule 1140, discharge into the atmosphere from any abrasive blasting any air contaminant for a period or periods aggregating more than three minutes in any one hour which is:
  - (A) As dark or darker in shade as that designated as No. 1 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 (2)(A).

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### APPENDIX B: RULE EMISSION LIMITS [RULE 1168 01-07-2005]

- (1) Unless otherwise specified in paragraph (c)(2), a person shall not apply any adhesives, adhesive bonding primers, adhesive primers, or any other primer which have a VOC content in excess of 250 g/L less water and less exempt compounds.
- (2) A person shall not apply adhesives, adhesive bonding primers, adhesive primers, sealants, sealant primers, or any other primer which have a VOC content in excess of the limits specified below:

#### **VOC Limit\*, Less Water and Less Exempt Compounds in Grams per Liter**

Architectural Applications	Current VOC Limit*
Indoor Carpet Adhesives	50
Carpet Pad Adhesives	50
Outdoor Carpet Adhesives	150
Wood Flooring Adhesive	100
Rubber Floor Adhesives	60
Subfloor Adhesives	50
Ceramic Tile Adhesives	65
VCT and Asphalt Tile Adhesives	50
Dry Wall and Panel Adhesives	50
Cove Base Adhesives	50
Multipurpose Construction Adhesives	70
Structural Glazing Adhesives	100
Single Ply Roof Membrane Adhesives	250

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### APPENDIX B: RULE EMISSION LIMITS [RULE 1168 01-07-2005]

Specialty Applications	VOC Limits and Effective Dates**			
	Current VOC Limit*	1-1-05	7-1-05	1-1-07
PVC Welding	510			
CPVC Welding	490			
ABS Welding	400		325	
Plastic Cement Welding	350	250		
Adhesive Primer for Plastic	650		550	
Computer Diskette Manufacturing	350			
Contact Adhesive	80			
Special Purpose Contact Adhesive	250			
Tire Retread	100			
Adhesive Primer for Traffic Marking Tape	150			
Structural Wood Member Adhesive	140			
Sheet Applied Rubber Lining Operations	850			
Top and Trim Adhesive	540			250

\*\* The specified limits remain in effect unless revised limits are listed in subsequent columns.

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### APPENDIX B: RULE EMISSION LIMITS [RULE 1168 01-07-2005]

For adhesives, adhesive bonding primers, or any other primer not regulated by the above two tables and applied to the following substrates, the following limits shall apply:

Substrate Specific Applications	Current VOC Limit*
Metal to Metal	30
Plastic Foams	50
Porous Material (except wood)	50
Wood	30
Fiberglass	80

If an adhesive is used to bond dissimilar substrates together the adhesive with the highest VOC content shall be allowed.

Sealants	Current VOC Limit*
Architectural	250
Marine Deck	760
Nonmembrane Roof	300
Roadway	250
Single-Ply Roof Membrane	450
Other	420

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### APPENDIX B: RULE EMISSION LIMITS [RULE 1168 01-07-2005]

Sealant Primers	Current VOC Limit*
Architectural	
Non Porous	250
Porous	775
Modified Bituminous	500
Marine Deck	760
Other	750

\* For low-solid adhesives or sealants the VOC limit is expressed in grams per liter of material as determined in paragraph (b)(32); for all other adhesives and sealants, VOC limits are expressed as grams of VOC per liter of adhesive or sealant less water and less exempt compounds as determined in paragraph (b)(31).

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### APPENDIX B: RULE EMISSION LIMITS [RULE 1171 02-01-2008]

(1) Solvent Requirements

A person shall not use a solvent to perform solvent cleaning operations unless the solvent complies with the applicable requirements set forth below:

	<b>CURRENT LIMITS*</b>	<b>EFFECTIVE 1/1/2008*</b>	<b>EFFECTIVE 1/1/2009</b>
<b>SOLVENT CLEANING ACTIVITY</b>	<b>VOC g/l (lb/gal)</b>	<b>VOC g/l (lb/gal)</b>	<b>VOC g/l (lb/gal)</b>
(A) Product Cleaning During Manufacturing Process Or Surface Preparation For Coating, Adhesive, Or Ink Application			
(i) General	25 (0.21)		
(ii) Electrical Apparatus Components & Electronic Components	100 (0.83)		
(iii) Medical Devices & Pharmaceuticals	800 (6.7)		
(B) Repair and Maintenance Cleaning			
(i) General	25 (0.21)		
(ii) Electrical Apparatus Components & Electronic Components	100 (0.83)		

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### APPENDIX B: RULE EMISSION LIMITS [RULE 1171 02-01-2008]

	CURRENT LIMITS*	EFFECTIVE 1/1/2008*	EFFECTIVE 1/1/2009
SOLVENT CLEANING ACTIVITY (cont.)	VOC g/l (lb/gal)	VOC g/l (lb/gal)	VOC g/l (lb/gal)
(iii) Medical Devices & Pharmaceuticals			
(A) Tools, Equipment, & Machinery	800 (6.7)		
(B) General Work Surfaces	600 (5.0)		
(C) Cleaning of Coatings or Adhesives Application Equipment	25 (0.21)		
(D) Cleaning of Ink Application Equipment			
(i) General	25 (0.21)		
(ii) Flexographic Printing	25 (0.21)		
(iii) Gravure Printing			
(A) Publication	100 (0.83)		
(B) Packaging	25 (0.21)		
(iv) Lithographic (Offset) or Letter Press Printing			
(A) Roller Wash, Blanket Wash, & On-Press Components			
(I) Newsprint	100 (0.83)		

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### APPENDIX B: RULE EMISSION LIMITS [RULE 1171 02-01-2008]

	<b>CURRENT LIMITS*</b>	<b>EFFECTIVE 1/1/2008*</b>	<b>EFFECTIVE 1/1/2009</b>
<b>SOLVENT CLEANING ACTIVITY (cont.)</b>	<b>VOC g/l (lb/gal)</b>	<b>VOC g/l (lb/gal)</b>	<b>VOC g/l (lb/gal)</b>
(II) Other Substrates	500 (4.2)	100 (0.83)	
(B) Removable Press Components	25 (0.21)		
(v) Screen Printing	500 (4.2)	100 (0.83)	
(vi) Ultraviolet Ink/ Electron Beam Ink Application Equipment (except screen printing)	650 (5.4)	650 (5.4)	100 (0.83)
(vii) Specialty Flexographic Printing	100 (0.83)		
(E) Cleaning of Polyester Resin Application Equipment	25 (0.21)		

\* The specified limits remain in effect unless revised limits are listed in subsequent columns.

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### APPENDIX B: RULE EMISSION LIMITS [RULE 1171 05-01-2009]

(1) Solvent Requirements

A person shall not use a solvent to perform solvent cleaning operations unless the solvent complies with the applicable requirements set forth below:

	<b>CURRENT LIMITS*</b>	<b>EFFECTIVE 1/1/2010</b>
<b>SOLVENT CLEANING ACTIVITY</b>	<b>VOC g/l (lb/gal)</b>	<b>VOC g/l (lb/gal)</b>
(A) Product Cleaning During Manufacturing Process Or Surface Preparation For Coating, Adhesive, Or Ink Application		
(i) General	25 (0.21)	
(ii) Electrical Apparatus Components & Electronic Components	100 (0.83)	
(iii) Medical Devices & Pharmaceuticals	800 (6.7)	
(B) Repair and Maintenance Cleaning		
(i) General	25 (0.21)	
(ii) Electrical Apparatus Components & Electronic Components	100 (0.83)	

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### APPENDIX B: RULE EMISSION LIMITS [RULE 1171 05-01-2009]

	<b>CURRENT LIMITS*</b>	<b>EFFECTIVE 1/1/2010</b>
<b>SOLVENT CLEANING ACTIVITY (cont.)</b>	<b>VOC g/l (lb/gal)</b>	<b>VOC g/l (lb/gal)</b>
(iii) Medical Devices & Pharmaceuticals		
(A) Tools, Equipment, & Machinery	800 (6.7)	
(B) General Work Surfaces	600 (5.0)	
(C) Cleaning of Coatings or Adhesives Application Equipment	25 (0.21)	
(D) Cleaning of Ink Application Equipment		
(i) General	25 (0.21)	
(ii) Flexographic Printing	25 (0.21)	
(iii) Gravure Printing		
(A) Publication	100 (0.83)	
(B) Packaging	25 (0.21)	
(iv) Lithographic (Offset) or Letter Press Printing		
(A) Roller Wash, Blanket Wash, & On-Press Components	100 (0.83)	

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### APPENDIX B: RULE EMISSION LIMITS [RULE 1171 05-01-2009]

	<b>CURRENT LIMITS*</b>	<b>EFFECTIVE 1/1/2010</b>
<b>SOLVENT CLEANING ACTIVITY (cont.)</b>	<b>VOC g/l (lb/gal)</b>	<b>VOC g/l (lb/gal)</b>
(B) Removable Press Components	25 (0.21)	
(v) Screen Printing	100 (0.83)	
(vi) Ultraviolet Ink/ Electron Beam Ink Application Equipment (except screen printing)	650 (5.4)	100 (0.83)
(vii) Specialty Flexographic Printing	100 (0.83)	
(E) Cleaning of Polyester Resin Application Equipment	25 (0.21)	

\* The specified limits remain in effect unless revised limits are listed in subsequent columns.

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### APPENDIX B: RULE EMISSION LIMITS [RULE 404 02-07-1986]

The operator shall not discharge into the atmosphere from this equipment, particulate matter in excess of the concentration at standard conditions, shown in Table 404(a). Where the volume discharged is between figures listed in the Table, the exact concentration permitted to be discharged shall be determined by linear interpolation.

For the purposes of this rule, emissions shall be averaged over one complete cycle of operation or one hour, whichever is the lesser time period.

**TABLE 404(a)**

Volume Discharged Calculated as Dry Gas At Standard Conditions		Maximum Concentration of Particulate Matter Allowed in Discharged Gas Calculated as Dry Gas at Standard Conditions		Volume Discharged Calculated as Dry Gas At Standard Conditions		Maximum Concentration of Particulate Matter Allowed in Discharged Gas Calculated as Dry Gas at Standard Conditions	
		Milligrams per Cubic Meter	Grains per Cubic Foot			Milligrams per Cubic Meter	Grains per Cubic Foot
Cubic meters Per Minute	Cubic feet Per Minute			Cubic meters Per Minute	Cubic feet Per Minute		
25 or less	883 or less	450	0.196	900	31780	118	0.0515
30	1059	420	.183	1000	35310	113	.0493
35	1236	397	.173	1100	38850	109	.0476
40	1413	377	.165	1200	42380	106	.0463
45	1589	361	.158	1300	45910	102	.0445

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### APPENDIX B: RULE EMISSION LIMITS [RULE 404 02-07-1986]

Volume Discharged Calculated as Dry Gas At Standard Conditions		Maximum Concentration of Particulate Matter” Allowed in Discharged Gas Calculated as Dry Gas at Standard Conditions		Volume Discharged Calculated as Dry Gas At Standard Conditions		Maximum Concentration of Particulate Matter Allowed in Discharged Gas Calculated as Dry Gas at Standard Conditions	
		Milligrams per Cubic Meter	Grains per Cubic Foot			Milligrams per Cubic Meter	Grains per Cubic Foot
Cubic meters Per Minute	Cubic feet Per Minute			Cubic meters Per Minute	Cubic feet Per Minute		
50	1766	347	.152	1400	49440	100	.0437
60	2119	324	.141	1500	52970	97	.0424
70	2472	306	.134	1750	61800	92	.0402
80	2825	291	.127	2000	70630	87	.0380
90	3178	279	.122	2250	79460	83	.0362
100	3531	267	.117	2500	88290	80	.0349
125	4414	246	.107	3000	105900	75	.0327
150	5297	230	.100	4000	141300	67	.0293
175	6180	217	.0947	5000	176600	62	.0271
200	7063	206	.0900	6000	211900	58	.0253
250	8829	190	.0830	8000	282500	52	.0227
300	10590	177	.0773	10000	353100	48	.0210
350	12360	167	.0730	15000	529700	41	.0179
400	14130	159	.0694	20000	706300	37	.0162
450	15890	152	.0664	25000	882900	34	.0148

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### APPENDIX B: RULE EMISSION LIMITS [RULE 404 02-07-1986]

Volume Discharged Calculated as Dry Gas At Standard Conditions		Maximum Concentration of Particulate Matter” Allowed in Discharged Gas Calculated as Dry Gas at Standard Conditions		Volume Discharged Calculated as Dry Gas At Standard Conditions		Maximum Concentration of Particulate Matter Allowed in Discharged Gas Calculated as Dry Gas at Standard Conditions	
		Milligrams per Cubic Meter	Grains per Cubic Foot			Milligrams per Cubic Meter	Grains per Cubic Foot
Cubic meters Per Minute	Cubic feet Per Minute			Cubic meters Per Minute	Cubic feet Per Minute		
500	17660	146	.0637	30000	1059000	32	.0140
600	21190	137	.0598	40000	1413000	28	.0122
700	24720	129	.0563	50000	1766000	26	.0114
800	28250	123	.0537	70000 or more	2472000 or more	23	.0100

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### APPENDIX B: RULE EMISSION LIMITS [RULE 405 02-07-1986]

The operator shall not discharge into the atmosphere from this equipment, solid particulate matter including lead and lead compounds in excess of the rate shown in Table 405(a).

Where the process weight per hour is between figures listed in the table, the exact weight of permitted discharge shall be determined by linear interpolation.

For the purposes of this rule, emissions shall be averaged over one complete cycle of operation or one hour, whichever is the lesser time period.

**TABLE 405(a)**

Process Weight Per Hour		Maximum Discharge Rate Allowed for Solid Particulate Matter (Aggregate Discharged From All Points of Process		Process Weight Per Hour		Maximum Discharge Rate Allowed for Solid Particulate Matter (Aggregate Discharged From All points of Process	
		Kilograms Per Hour	Pounds Per Hour			Kilograms Per Hour	Pounds Per Hour
100 or less	220 or less	0.450	0.99	9000	19840	5.308	11.7
150	331	0.585	1.29	10000	22050	5.440	12.0
200	441	0.703	1.55	12500	27560	5.732	12.6
250	551	0.804	1.77	15000	33070	5.982	13.2
300	661	0.897	1.98	17500	38580	6.202	13.7
350	772	0.983	2.17	20000	44090	6.399	14.1
400	882	1.063	2.34	25000	55120	6.743	14.9
450	992	1.138	2.51	30000	66140	7.037	15.5
500	1102	1.209	2.67	35000	77160	7.296	16.1
600	1323	1.340	2.95	40000	88180	7.527	16.6

## FACILITY PERMIT TO OPERATE AMERICAN SECURITY PRODUCTS CO INC

### APPENDIX B: RULE EMISSION LIMITS [RULE 405 02-07-1986]

Process Weight Per Hour		Maximum Discharge Rate Allowed for Solid Particulate Matter (Aggregate Discharged From All Points of Process		Process Weight Per Hour		Maximum Discharge Rate Allowed for Solid Particulate Matter (Aggregate Discharged From All points of Process	
		Kilograms Per Hour	Pounds Per Hour			Kilograms Per Hour	Pounds Per Hour
700	1543	1.461	3.22	45000	99210	7.738	17.1
800	1764	1.573	3.47	50000	110200	7.931	17.5
900	1984	1.678	3.70	60000	132300	8.277	18.2
1000	2205	1.777	3.92	70000	154300	8.582	18.9
1250	2756	2.003	4.42	80000	176400	8.854	19.5
1500	3307	2.206	4.86	90000	198400	9.102	20.1
1750	3858	2.392	5.27	100000	220500	9.329	20.6
2000	4409	2.563	5.65	125000	275600	9.830	21.7
2250	4960	2.723	6.00	150000	330700	10.26	22.6
2500	5512	2.874	6.34	175000	385800	10.64	23.5
2750	6063	3.016	6.65	200000	440900	10.97	24.2
3000	6614	3.151	6.95	225000	496000	11.28	24.9
3250	7165	3.280	7.23	250000	551200	11.56	25.5
3600	7716	3.404	7.50	275000	606300	11.82	26.1
4000	8818	3.637	8.02	300000	661400	12.07	26.6
4500	9921	3.855	8.50	325000	716500	12.30	27.1
5000	11020	4.059	8.95	350000	771600	12.51	27.6
6000	13230	4.434	9.78	400000	881800	12.91	28.5
7000	15430	4.775	10.5	450000	992100	13.27	29.3
8000	17640	5.089	11.2	500000 or more	1102000 or more	13.60	30.0