



SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

Engineering and Compliance Office

APPLICATION PROCESSING AND CALCULATIONS

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PERMITS TO CONSTRUCT  
INITIAL TV PERMIT  
RELOCATION

Legal Owner  
173108

ID:

or Operator: SILVER CREEK INDUSTRIES, INC  
2830 BARRETT AVENUE  
PERRIS, CA 92571

Equipment  
Location: SAME AS ABOVE

Equipment Description:  
A/N 545231  
Initial Title V Permit

A/N 545233 (Relocation, Previous PO No. F96417, A/N 476139)  
OPEN SPRAY SYSTEM NO. 1, CONSISTING OF:  
1. PUMP, BINKS, INFINITY 30:1  
2. TWO HVLP GUNS, BINKS, AA 4000

A/N 545234 (Relocation, Previous PO No. F96418, A/N 476140)  
OPEN SPRAY SYSTEM NO. 2, CONSISTING OF:  
1. PUMP, BINKS, INFINITY 30:1  
2. TWO HVLP GUNS, BINKS, AA 4000

A/N 545235 (Relocation, Previous PO No. F96419, A/N 476141)  
OPEN SPRAY SYSTEM NO. 3, CONSISTING OF:  
1. PUMP, BINKS, INFINITY 30:1  
2. TWO HVLP GUNS, BINKS, AA 4000

A/N 545236 (Relocation, Previous PO No. F96420, A/N 476142)  
OPEN SPRAY SYSTEM NO. 4, CONSISTING OF:  
1. PUMP, BINKS, INFINITY 30:1  
2. TWO HVLP GUNS, BINKS, AA 4000

A/N 545237 (Relocation, Previous PO No. F96414, A/N 476109)  
OPEN SPRAY SYSTEM NO. 5, CONSISTING OF:  
1. PUMP, BINKS, INFINITY 30:1  
2. TWO HVLP GUNS, BINKS, AA 4000

A/N 545238 (Relocation, Previous PO No. F96415, A/N 476110)  
OPEN SPRAY SYSTEM NO. 6, CONSISTING OF:  
1. PUMP, BINKS, INFINITY 30:1  
2. TWO HVLP GUNS, BINKS, AA 4000

A/N 545239 (Relocation, Previous PO No. F96416, A/N 476111)  
OPEN SPRAY SYSTEM NO. 7, CONSISTING OF:



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1. PUMP, BINKS, INFINITY 30:1
2. TWO HVLP GUNS, BINKS, AA 4000

A/N 545240 (Relocation, Previous PO No. F99230, A/N 483630)

SPRAY BOOTH, BLEEKER, SABB-46, FLOOR TYPE, 14'-4" W. X 46'-2" L. X 10'-0" H., WITH EIGHTEEN 20" X 20" EXHAUST FILTERS AND ONE 2-HP EXHAUST FAN.

### History

Silver Creek Industries manufactures school classroom modular buildings. At its existing facility (ID 147128) at 195 E. Morgan Street, Perris, CA, the company operates seven identical open spray systems, a spray booth, and an asphalt kettle system, with the following emission limits:

1. a facility-wide monthly VOC limit of 2040 pounds
2. a facility-wide monthly PM10 limit of 667 pounds
3. an equipment daily PM10 limit of 9.84 pounds from each open spray system
4. an equipment daily VOC limit of 15 pounds from the spray booth

In this project, the company is proposing to relocate all equipment, except for the asphalt kettle system (F82593, A/N 453277), to a new location within the same city, at 2830 Barrett Ave.

The facility on Morgan is a Title V facility. Since the facility has the potential to emit 10 tons of VOC per year, the facility is required and has submitted an initial Title V permit application, A/N 545231 for the new location.

Review of District compliance records indicates that the facility has had no citizen complaints filed, or Notices of Violation issued in the last two years. However, the facility was issued a Notice to Comply on 9/20/2012 requiring the applicant to submit the semi-annual compliance monitoring report for first six months of 2012 by the due date. The applicant provided the report and is currently operating in compliance with all applicable rules and permit conditions.

### Process Description

The company has a total of five production lines each with floor tracks similar to a railroad tracks. Rectangular metal beams are cut and welded together to form a metal frame. The spray booth is used



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mainly to apply coatings to the metal frames. However, coating of wood articles are also conducted in the spray booth.

The painted frame is then placed on top of a dolly that rolls on the track. Along the track, installation of flooring, outside walls, and roof around the metal frame is carried out manually in stages to form a modular building.

Next, electrical wiring, drop ceiling frames, air conditioning ducting, insulation and interior walls are installed to the modular building. Interior walls on some of the modular buildings are not painted and left to the user to finish.

Finally, the exterior walls are painted with either rollers or spray guns, with rollers being used most of the time.

Emission Calculations

The following is the proposed maximum operating schedule:

<u>hr/dy</u>	<u>dy/wk</u>	<u>wk/yr</u>
24	7	52

The following values are used in the emission calculations:

1. PSB Dry Filter Control Efficiency = 90%
2. HVLP Transfer efficiency = 65%
3. Fall out = 20%
4. PM10 = 50% PM

Spray Booth:

The spray booth is subject to the following limits:

1. 2040 pounds of VOC per month, facility-wide
2. 667 pounds of PM10 per month, facility-wide
3. 15 pounds of VOC per day, from the use of all coatings and solvents.

The applicant has estimated the following usages as a worst case:

Material Description	Average	Maximum	Density	Solid	Material VOC	Ethylene Glycol	EGBE
	(gals/day)		(lb/gal)			(wt %)	
306-WID Durus-cote plus exterior flat latex low-VOC hi-hide base	25	38	12.3	7.626	0.32		



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<i>A-100 Exterior Flat Latex Paint</i>	25	38	11.35	3.9725	0.14		
<i>SF-550 high performance latex subfloor</i>	12	50	11.483	7.464	0.23	2	
<i>TIS-25 Chassis Black</i>	18	27	9.096	1.91	0.54		
<i>WR-1021-01 W/B Red Ox Primer</i>	10	15	10.264	9.944(?)	0.32		
<i>WR-1021 W/B Red Ox Primer</i>	10	15	10.44	9.93(?)	0.51		5
<i>Rustic II White Base</i>	24	36	11.10	5.364	0.14		
<i>DTM Gloss White</i>	13	20	9.93	4.57	0.308		
<i>Endurable S/G White</i>	25	38	10.35	4.8	0.144		

Potentially the above maximum levels of materials may be used inside the spray booth as a worst case. However, not all materials will be used all at once and not all on the same day at these maximum levels. At the end of each day, the applicant will manage material usages to comply with all of the above permit conditions.

The attached Excel worksheet calculates criteria and toxic pollutants from the spray booth based on the condition limit of 15 lbs of VOC per day. The following is a summary of calculated results:

	(lb/mon)	(lb/dy)	(lb/hr)
<i>maximum VOC</i>	455.01	15.00	0.63
<i>average VOC</i>	270.72	8.92	0.37
<i>maximum PM10</i>	174.01	5.74	0.24
<i>average PM10</i>	94.23	3.11	0.13
<i>maximum ethylene glycol</i>		2.37	0.10
<i>maximum EGBE</i>		1.62	0.07

Each open spray system:

Each open spray system is subject to the following limits:

1. 2040 pounds of VOC per month, facility-wide
2. 667 pounds of PM10 per month, facility-wide
3. 9.84 pounds of PM10 per day, from the use of all coatings and solvents.

The applicant has estimated the following usages as a worst case:

<i>Material Description</i>	<i>Average</i>	<i>Maximum</i>	<i>Density</i>	<i>Solid</i>	<i>Material VOC</i>	<i>Ethylene Glycol</i>	<i>EGBE</i>
	<i>(gals/day)</i>		<i>(lb/gal)</i>			<i>(wt %)</i>	
<i>306-WID Durus-cote plus exterior flat latex low-VOC hi-hide base</i>	10	13	12.3	7.626	0.32		



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<i>A-100 Exterior Flat Latex Paint</i>	10	16	11.35	3.9725	0.14		
<i>SF-550 high performance latex subfloor</i>	12	50	11.483	7.464	0.23	2	
<i>TIS-25 Chassis Black</i>	10	40	9.096	1.91	0.54		
<i>WR-1021-01 W/B Red Ox Primer</i>	10	21	10.264	9.944(?)	0.32		
<i>WR-1021 W/B Red Ox Primer</i>	10	21	10.44	9.93(?)	0.51		5
<i>Rustic II White Base</i>	10	18	11.10	5.364	0.14		
<i>DTM Gloss White</i>	12	20	9.93	4.57	0.308		
<i>Endurable S/G White</i>	12	19	10.35	4.8	0.144		

Potentially the above maximum levels of materials may be used inside each open spray system as a worst case. However, not all materials will be used all at once and not all on the same day at these maximum levels. At the end of each day, the applicant will manage material usages to comply with all of the above permit conditions for each open spray system.

The attached Excel worksheet calculates criteria and toxic pollutants from each open spray system based on the above usages. The following is a summary of calculated results:

	(lb/mon)	(lb/dy)	(lb/hr)
<i>maximum VOC</i>	93.72	3.09	0.13
<i>average VOC</i>	38.23	1.26	0.05
<i>maximum PM10</i>	298.48	9.84	0.41
<i>average PM10</i>	130.25	4.29	0.18
<i>maximum ethylene glycol</i>		0.52	0.02
<i>maximum EGBE</i>		0.50	0.02

Rule 1401 Evaluation

Based on MSDS, most of materials being proposed do not contain any toxic air contaminants (TACs), except for SF-550 High Performance Laxtex Subfloor and WR-1021 W/B Red Ox Primer as shown in the above tables.

The attached excel worksheets calculate HIAs and HICs from the spray booth and from each open spray system. This project will result in no cancer risks (MICR). The following is a summary of the calculated HICs and HIAs:

*Paint Spray Booth*



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Target Organs	Acute	Chronic	Acute Pass/Fail	Chronic Pass/Fail
Alimentary system (liver) - AL			Pass	Pass
Bones and teeth - BN			Pass	Pass
Cardiovascular system - CV			Pass	Pass
Developmental - DEV		9.35E-03	Pass	Pass
Endocrine system - END			Pass	Pass
Eye	2.64E-03		Pass	Pass
Hematopoietic system - HEM			Pass	Pass
Immune system - IMM			Pass	Pass
Kidney - KID		9.35E-03	Pass	Pass
Nervous system - NS			Pass	Pass
Reproductive system - REP			Pass	Pass
Respiratory system - RES	2.64E-03	9.35E-03	Pass	Pass
Skin			Pass	Pass

*Each Open Spray System*

Target Organs	Acute	Chronic	Acute Pass/Fail	Chronic Pass/Fail
Alimentary system (liver) - AL			Pass	Pass
Bones and teeth - BN			Pass	Pass
Cardiovascular system - CV			Pass	Pass
Developmental - DEV		2.05E-03	Pass	Pass
Endocrine system - END			Pass	Pass
Eye	8.08E-04		Pass	Pass
Hematopoietic system - HEM			Pass	Pass
Immune system - IMM			Pass	Pass
Kidney - KID		2.05E-03	Pass	Pass
Nervous system - NS			Pass	Pass
Reproductive system - REP			Pass	Pass
Respiratory system - RES	8.08E-04	2.05E-03	Pass	Pass
Skin			Pass	Pass

Calculated HIAs and HICs for all target organs are less than 1.0. Therefore, Rule 1401 compliance is expected for this project even with worst cases.



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New Source Review Evaluation

Rule 1303(a)--BACT

PSB: The applicant is accepting a VOC daily limit of 15 pounds per day, in compliance with BACT for controlling VOC emissions from PSB. The booth is equipped with filters that are at least 2-inch thick, in compliance with BACT for controlling PM emissions.

Open Spray: Enclosing the entire spray painting operation of modular buildings is not currently technologically feasible for controlling PM emissions. Silver Creek accepts a condition that requires a plastic cover over any opened sections of modular buildings such that no PM emissions escaped to atmosphere during any interior spray painting operations.

The use of low VOC coatings (containing less than 1 lb/gallon as applied) is required as shown in the proposed permit condition for both PSB and open spray systems.

Rule 1303(b)(1)--MODELING

The screening limit specified in Table A-2 of Rule 1303 for a non-combustion source is 0.41 lb/hr of PM10, which is equivalent to 9.84 lb/dy of PM10.

PSB: The calculated PM10 emissions from the spray booth are less than 0.41 lb/hr. Therefore, further air quality modeling analysis is not needed for the spray booth.

Open Spray: Permit condition limiting PM10 emissions from each open spray system to less than 9.84 lb/dy are specified on the permit. Therefore, further air quality modeling analysis is not needed for each open spray system.

Rule 1303(b)(2)--OFFSET

Rule 1304(c)(1) provides an exemption from the offset requirements for any source that is a relocation of an existing source within the District, under the same operator and



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ownership, and provided that the potential to emit (PTE) of any air contaminant will not be greater at the new location than at the previous location when the source is operated at the same conditions and as if current BACT were applied.

At the previous location, Silver Creek Industries is already in compliance with current BACT requirements. The PTEs at the new location will not be greater than the PTEs at the previous location. The new facility will also be operated under the same permit conditions as those conditions at the previous location.

The following emissions have been entered for each pending application (from each previous application):

Pending A/Ns (previous A/Ns)	30DA (lb/dy)						
	ROG	NO <sub>x</sub>	PM <sub>10</sub>	PM	SO <sub>2</sub>	CO	TOG
545233 (476139)	0		5	10			
545234 (476140)	0		0				
545235 (476141)	0		0				
545236 (476142)	68		10	20			68
545237 (476109)	0		0				
545238 (476110)	0		0				
545239 (476111)	0		0				
545240 (483630)	0		0				

External offsets are not needed. The project is in compliance with emission offset requirements.

Rule Evaluation

Rule 212(c)(1): This section requires a public notice for all new or modified permit units that may emit air contaminants located within 1,000 feet from the outer boundary of a school.

Since no school is located within 1,000 ft, a public notice will not be required per this section.

Rule 212(c)(2): This section requires a public notice for all new or modified facilities that have on-site emission increases exceeding any of the daily maximums as specified by Rule 212(g).

The equipment relocation will result in the following emission increases facility-wide:

Maximum Daily Controlled Emissions (lbs/day)
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	ROG	NO <sub>x</sub>	PM <sub>10</sub>	SO <sub>2</sub>	CO	Pb
Total Increase (lb/dy)	68	0	22	0	0	0
MAX Limit (lb/dy)	<b>30</b>	<b>40</b>	<b>30</b>	<b>60</b>	<b>220</b>	<b>3</b>
Notice Required	YES	NO	NO	NO	NO	NO

A public notice is required per this section since the emission increase is more than the limits.

Rule 212(c)(3): There will be increases in TACs. However, the calculated MICR is less than 1E-6 for both receptors. Therefore, a public notice will not be required per this section.

Rule 212(g): This section requires a public notice for all new or modified sources that have equipment emission increases exceeding any of the daily maximums as specified by Rule 212(g).

The equipment relocation will result in the following emission increases from the project:

	Maximum Daily Controlled Emissions (lbs/day)					
	ROG	NO <sub>x</sub>	PM <sub>10</sub>	SO <sub>2</sub>	CO	Pb
Per equipment	68	0	22	0	0	0
MAX Limit (lb/dy)	<b>30</b>	<b>40</b>	<b>30</b>	<b>60</b>	<b>220</b>	<b>3</b>
Notice Required	YES	NO	NO	NO	NO	NO

A public notice is required per this section since the ROG emission increase is more than the limits.

Rule 401: Visible emissions are not expected with the proper operation of the equipment.

Rule 402: Nuisance is not expected with the proper operation of the equipment.

Rule 481: Effectiveness of HVLP guns to reduce PM10 emissions are considered at least same or greater than airless spray equipment. Therefore, this project is expected to comply with this Rule.



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- Rule 1107: The proposed coatings contain a maximum VOC of 120 g/L VOC, in compliance with the limit of 275 g/L of Rule 1107(c)(2) for a pre-fabricated one-component architectural coating.  
Using of HVLP guns is in compliance with Rule 1107(c)(1).
- Rule 1136: The proposed coatings contain a maximum VOC of 120 g/L VOC, in compliance with the limit of 275 g/L of Rule 1136(c)(1)(A) for top coats and primers.  
Using of HVLP guns is in compliance with Rule 1136(c)(2).
- Rule 1171: Water and acetone is used in cleaning application equipment, in compliance with Rule 1171.
- Rule 1303: (see New Source Review Evaluation Section)
- Rule 1401: Some of proposed coatings contain small levels of ethylene glycol and EGBE. However, calculated HIAs and HICs for both receptors are less than 1.0, in compliance with Rule 1401.
- Reg. XXX: The facility at its former location was issued a Title V permit under ID 147128. The facility has submitted an initial Title V application (A/N 545231) for the new location. A proposed permit incorporating the above equipment will be submitted to EPA for 45-day review and 30-day public comment period.

CEQA Evaluation



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In the applicant Form 400-CEQA, from Section B to Section C, all questions have been responded with NOs. Therefore, this project is not expected to have any potential to generate significant adverse environmental impacts that might require preparation of a CEQA document.

Recommendation

The proposed project is expected to comply with all applicable District Rules and Regulations. After the completion of public notices as required by Rule 212 and 3006, if EPA and the public do not have any objections to the issuance of the permit, an initial Title V permit with the following conditions will be issued to Silver Creek Industries at the new location:

FACILITY-wide

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 2040 POUNDS IN ANY ONE CALENDAR MONTH.  
[RULE 1303(b)(2)-OFFSET]
3. THE TOTAL EMISSIONS OF PARTICULATE MATTER, WITH TEN MICRON DIAMETER OR LESS (PM10), FROM ALL PERMITTED EQUIPMENT AND ASSOCIATED OPERATIONS AT THIS FACILITY SHALL NOT EXCEED 667 POUNDS IN ANY ONE CALENDAR MONTH.  
[RULE 1303(b)(2)-OFFSET]
4. IN ADDITION TO THE RECORD KEEPING REQUIREMENTS OF RULE 109, THE OPERATOR SHALL KEEP ADEQUATE RECORDS FOR THIS FACILITY TO VERIFY THE CALENDAR MONTHLY VOC EMISSIONS IN POUNDS AND THE VOC CONTENT OF EACH MATERIAL AS APPLIED (INCLUDING WATER AND EXEMPT COMPOUNDS). IN ADDITION, RECORDS SHALL BE KEPT TO VERIFY COMPLIANCE WITH CONDITION NOS. 2 AND 3. THESE RECORDS SHALL BE PREPARED IN A FORMAT WHICH IS ACCEPTABLE TO THE DISTRICT, SHALL BE RETAINED AT THE FACILITY FOR AT LEAST FIVE YEARS, AND SHALL BE MADE AVAILABLE TO DISTRICT PERSONNEL UPON REQUEST.  
[RULE 109, 1303(b)(2)-OFFSET]



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5. WITHIN 14 CALENDAR DAYS AFTER THE END OF EACH MONTH, THE OPERATOR SHALL TOTAL AND RECORD VOC AND PM10 EMISSIONS FOR THE MONTH FOR ALL EQUIPMENT AND OPERATIONS COVERED BY THE MONTHLY LIMIT. 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.  
[RULE 109, 1303(b)(2)-OFFSET]
6. THE OPERATOR SHALL MAINTAIN A SINGLE LIST WHICH 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.  
[RULE 109, 1303(b)(2)-OFFSET]
7. THE OPERATOR SHALL 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 FOR FIVE YEARS.  
[RULE 109, 1303(b)(2)-OFFSET]
8. 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 109, 1303(b)(2)-OFFSET]
9. MATERIAL SAFETY DATA SHEETS FOR ALL MATERIALS USED AT THIS FACILITY SHALL BE KEPT CURRENT AND BE MADE AVAILABLE TO DISTRICT PERSONNEL UPON REQUEST.  
[RULE 109, 1303(b)(2)-OFFSET]

PSB

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 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 TOTAL QUANTITY OF VOLATILE ORGANIC COMPOUND (VOC) EMISSIONS FROM THIS EQUIPMENT AND ASSOCIATED OPERATIONS SHALL NOT EXCEED 15 POUNDS IN ANY ONE DAY. ASSOCIATED OPERATIONS INCLUDE, BUT ARE NOT LIMITED TO, SURFACE PREPARATION AND EQUIPMENT CLEAN-UP.  
[RULE 1303(a)(1)-BACT]



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6. MATERIALS USED IN THIS EQUIPMENT SHALL NOT CONTAIN ANY TOXIC AIR CONTAMINANTS IDENTIFIED IN RULE 1401, TABLE WITH AN EFFECTIVE DATE OF SEPTEMBER 10, 2010 OR EARLIER, EXCEPT ETHYLENE GLYCOL (CAS NO. 107-21-1) AND ETHYLENE GLYCOL MONOBUTYL ETHER (CAS NO. 111-76-1).  
[RULE 1401]
7. IN ADDITION TO THE RECORD KEEPING REQUIREMENTS OF RULE 109, THE OPERATOR SHALL KEEP ADEQUATE RECORDS FOR THIS EQUIPMENT TO VERIFY THE DAILY 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, SHALL BE RETAINED AT THE FACILITY FOR AT LEAST FIVE YEARS, AND SHALL BE MADE AVAILABLE TO DISTRICT PERSONNEL UPON REQUEST.  
[RULE 109, 1303(a)(1)-BACT, 1303(b)(2)-OFFSET]

**Periodic Monitoring:**

8. 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)]
9. THE OPERATOR SHALL DETERMINE AND RECORD THE PRESSURE DROP ACROSS THE FILTER ONCE EVERY WEEK.  
[RULE 3004(a)(4)]

**Emissions and Requirements:**

10. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATION:  
  
VOC: RULE 109  
VOC: RULE 1107, SEE APPENDIX B FOR EMISSION LIMITS  
VOC: RULE 1136, SEE APPENDIX B FOR EMISSION LIMITS  
VOC: RULE 1171, SEE APPENDIX B FOR EMISSION LIMITS  
PM: RULE 404, SEE APPENDIX B FOR EMISSION LIMITS  
PM: RULE 481

OPEN SPRAY SYSTEM

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]



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2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.  
[RULE 204]
3. THE VOC CONTENT OF MATERIALS USED IN THIS EQUIPMENT SHALL NOT EXCEED 1 POUND OF VOC, LESS WATER AND EXEMPT COMPOUNDS, PER GALLON AS APPLIED.  
[RULE 1303(a)(1)-BACT, 1303(b)(2)-OFFSET]
4. THE MAXIMUM QUANTITY OF PM10 EMISSIONS FROM THIS EQUIPMENT SHALL NOT EXCEED 9.84 POUNDS IN ANY ONE DAY.  
[RULE 1303(b)(1)-MODELING]
5. THE PM10 EMISSIONS FROM THIS EQUIPMENT SHALL BE CALCULATED USING THE FORMULA:  
  

$$PM10 = (\text{QUANTITY OF COATING SPRAYED IN GALLONS}) \times (\text{COATING SOLID CONTENT, IN POUNDS PER GALLON}) \times (1-0.75) \times (1-0.20) \times 0.50$$
  
[RULE 1303(b)(1)-MODELING]
6. DURING INTERIOR SPRAY PAINTING OPERATIONS OF MODULAR BUILDINGS, ANY WINDOWS, DOORS, OR ANY OTHER OPENINGS SHALL BE COMPLETELY COVERED BY PLASTIC IN SUCH A WAY THAT NO PARTICULATE EMISSIONS ESCAPE TO THE ATMOSPHERE.  
[RULE 1303(a)(1)-BACT, 1303(b)(2)-OFFSET]
7. THE AIR PRESSURE AT THE INLET OF THE SPRAY GUN SHALL NOT EXCEED 15 PSI. A GAUGE SHALL BE INSTALLED AT THE AIR INLET OF THE SPRAY GUN TO VERIFY THE INLET PRESSURE.  
[RULE 1107(c)(1)-TRANSFER EFFICIENCY]
8. THE SPRAY GUN FLUID PRESSURE SHALL NOT EXCEED 4000 PSI. A GAUGE SHALL BE INSTALLED AT THE PUMP TO VERIFY THE FLUID PRESSURE.  
[RULE 1107(c)(1)-TRANSFER EFFICIENCY]
9. MATERIALS USED IN THIS EQUIPMENT SHALL NOT CONTAIN ANY TOXIC AIR CONTAMINANTS IDENTIFIED IN RULE 1401, TABLE WITH AN EFFECTIVE DATE OF SEPTEMBER 10, 2010 OR EARLIER, EXCEPT ETHYLENE GLYCOL (CAS NO. 107-21-1) AND ETHYLENE GLYCOL MONOBUTYL ETHER (CAS NO. 111-76-1).  
[RULE 1401]
10. IN ADDITION TO THE RECORD KEEPING 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). IN ADDITION, RECORDS SHALL BE KEPT TO VERIFY COMPLIANCE WITH CONDITION NOS. 3, 4, 7 AND 8. THESE RECORDS SHALL BE PREPARED IN A FORMAT WHICH IS ACCEPTABLE TO THE DISTRICT, SHALL BE RETAINED AT THE FACILITY FOR AT LEAST FIVE YEARS, AND SHALL BE MADE AVAILABLE TO DISTRICT PERSONNEL UPON REQUEST.  
[RULE 109, 1303(a)(1)-BACT, 1303(b)(2)-OFFSET]

**Emissions and Requirements:**

11. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATION:  
  
VOC: RULE 109



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VOC: RULE 1136, SEE APPENDIX B FOR EMISSION LIMITS  
VOC: RULE 1171, SEE APPENDIX B FOR EMISSION LIMITS