

FACILITY PERMIT TO OPERATE ENGINEERED POLYMER SOLUTION, VALSPAR

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 2: PAINT MIXING					
System 2: Tank Cleaning System					
CLEANER, TANK WASHER, HOCKMEYER, MODEL CMX-100, WITH A VAPOR RECOVERY SYSTEM AND A VACCUUM PUMP. WITH A/N: STORAGE TANK, FRESH ACETONE STORAGE TANK, ACETONE DECANT, 250 GALLON CAPACITY	D88				A63.9, B59.5, E57.5, E448.1, K67.8 E129.1
Process 5: SOIL VAPOR EXTRACTION SYSTEM					
CARBON ADSORBER, THREE ACTIVATED CARBON CANISTERS IN SERIES, US FILTER, MODEL VSC-2000, 2000 POUNDS EACH WITH A/N: VAPOR EXTRACTION WELL, WITH 40-GALLON CAPACITY KNOCK-OUT POT, AND A 10-HP EXTRACTION BLOWER, 300 SCFM MAXIMUM.	C91				B27.3, C6.4, C6.5, C6.6, D90.1, D90.2, E128.1, E153.1, H23.6, K67.9, K67.10 E57.6, E448.2

* (1) (1A) (1B) Denotes RECLAIM emission factor
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit
 (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit
 (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits
 (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE ENGINEERED POLYMER SOLUTION, VALSPAR

SECTION H: DEVICE ID INDEX

**The following sub-section provides an index
to the devices that make up the facility
description sorted by device ID.**

FACILITY PERMIT TO OPERATE ENGINEERED POLYMER SOLUTION, VALSPAR

SECTION H: DEVICE ID INDEX

Device Index For Section H			
Device ID	Section H Page No.	Process	System
D88	1	2	2
C91	1	5	0

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The operator shall comply with the terms and conditions set forth below:

FACILITY CONDITIONS

F2.1 The operator shall limit emissions from this facility as follows:

CONTAMINANT	EMISSIONS LIMIT
Single Volatile Hazardous Air Pollutant (VHAP)	Less than 10.0 TONS IN ANY CONSECUTIVE 12-MONTH PERIOD

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The operator shall comply with the terms and conditions set forth below:

To comply with the 10.0 tons/yr Single Volatile Hazardous Air Pollutant (VHAP) emission limit(s) of this permit, calendar monthly records of coating throughput by coating category, based on a 12-month rolling total shall be maintained and kept for a period of five years and be made available to District representatives upon request.

Coating category emission factors shall be based on the U.S. EPA Emission Inventory Improvement Program (EIIP) Guidance Document and used to calculate monthly VHAP emissions and evaluate compliance with the above conditions.

To ensure compliance with the annual VHAP emission limit(s) of this permit, the operator shall comply with the following recordkeeping requirements:

- (1) The operator shall comply with Rule 1141.1 (Recordkeeping for Coating and Ink Manufacturing).
- (2) Within 14 calendar days of the end of each month, the operator shall total and record VHAP emissions for the month from all equipment and operations covered by the annual emission limit(s). The record shall include but not be limited to procedures used to account for control device efficiencies and/or waste disposal. The records shall be signed and certified for accuracy by the highest ranking individual responsible for compliance with District Rules.
- (3) The operator shall maintain a single list which shall include but not be limited to the name and address of each source from which VHAP-containing material regulated by the District that was used or stored at the facility during the preceding 12 months was acquired.
- (4) The operator shall maintain all purchase invoices for all VHAP-containing material used or stored at the facility, and all waste manifests for all VHAP-containing waste material removed from the facility for five years.
- (5) Calendar monthly records of coating throughput by coating category shall be prepared in a format which is acceptable to the District. Maintain all records required by this permit at the facility. Records shall be kept and be made available to District representatives upon request.

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The operator shall comply with the terms and conditions set forth below:

F2.2 The operator shall limit emissions from this facility as follows:

CONTAMINANT	EMISSIONS LIMIT
Combination of Volatile Hazardous Air Pollutants (VHAPs)	Less than 25.0 TONS IN ANY CONSECUTIVE 12-MONTH PERIOD

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The operator shall comply with the terms and conditions set forth below:

To comply with the 25.0 tons/yr Combination of Volatile Hazardous Air Pollutant (VHAP) emission limit(s) of this permit, calendar monthly records of coating throughput by coating category, based on a 12-month rolling total shall be maintained and kept for a period of five years and be made available to District representatives upon request.

Coating category emission factors shall be based on the U.S. EPA Emission Inventory Improvement Program (EIIP) Guidance Document and used to calculate monthly combination of VHAP emissions and evaluate compliance with the above conditions.

To ensure compliance with the annual combination of VHAP emission limit(s) of this permit, the operator shall comply with the following recordkeeping requirements:

- (1) The operator shall comply with Rule 1141.1 (Recordkeeping for Coating and Ink Manufacturing).
- (2) Within 14 calendar days of the end of each month, the operator shall total and record VHAP emissions for the month from all equipment and operations covered by the annual emission limit(s). The record shall include but not be limited to procedures used to account for control device efficiencies and/or waste disposal. The records shall be signed and certified for accuracy by the highest ranking individual responsible for compliance with District Rules.
- (3) The operator shall maintain a single list which shall include but not be limited to the name and address of each source from which VHAP-containing material regulated by the District that was used or stored at the facility during the preceding 12 months was acquired.
- (4) The operator shall maintain all purchase invoices for all VHAP-containing material used or stored at the facility, and all waste manifests for all VHAP-containing waste material removed from the facility for five years.
- (5) Calendar monthly records of coating throughput by coating category shall be prepared in a format which is acceptable to the District. Maintain all records

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The operator shall comply with the terms and conditions set forth below:

required by this permit at the facility. Records shall be kept and be made available to District representatives upon request.

DEVICE CONDITIONS

A. Emission Limits

A63.9 The operator shall limit emissions from this equipment as follows:

CONTAMINANT	EMISSIONS LIMIT
VOC	Less than or equal to 14 LBS IN ANY ONE MONTH

The operator shall use the following equation to calculate the emissions: $VOC = [(0.83 \text{ lb. VOC /cleaning cycle} \times \text{no. of cleaning cycles/month}) - \text{VOC emissions from waste generated from the Acetone decant tank}]$

VOC emissions from the waste generated in Acetone decant tank= solvent waste generated in gallons per month x lb./gallon VOC based on Lab analysis in accordance with condition no. K67.8

[RULE 1303(b)(2)-Offset, 5-10-1996]

[Devices subject to this condition : D88]

B. Material/Fuel Type Limits

B27.3 The operator shall not use materials containing any compounds identified in the SCAQMD Rule 1401 (except for those compounds listed below), as amended 09/10/2010.

For the purposes of this condition, compounds are those in Table I of the above mentioned rule, with an effective date of 09/10/2010 or earlier.

COMPOUND	CAS NO.
Benzene	71-43-2

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1,3 Butadiene	106-99-0
Acrolein	107-02-8
Carbon Disulfide	75-15-0
1,1, Dichloroethane	75-34-3
Toluene	108-88-3
Ethylbenzene	100-41-4
Xylenes (Isomers & Mixtures)	1330-20-7
Naphthalene	91-20-3
Styrene	100-42-5

[RULE 1401, 9-10-2010]

[Devices subject to this condition : C91]

B59.5 The operator shall only use the following material(s) for cleaning :

Acetone

[RULE 1303(b)(2)-Offset, 5-10-1996]

[Devices subject to this condition : D88]

C. Throughput or Operating Parameter Limits

C6.4 The operator shall use this equipment in such a manner that the hydrocarbon concentration being monitored, as indicated below, does not exceed 5 ppm.

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The operator shall comply with the terms and conditions set forth below:

The operator shall measure hydrocarbons at the outlet of the second carbon vessel (sequenced in the direction of flow). The measurements shall be performed with a District approved handheld Organic Vapor Analyzer (OVA) on a weekly basis. The analyzer shall be maintained and calibrated according to EPA Method 21 requirements. The analyzer shall be calibrated in parts per million by volume of hexane, or, if another calibrating agent is used, it shall be correlated to and expressed as hexane.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(b)(2)-Offset, 5-10-1996]

[Devices subject to this condition : C91]

- C6.5 The operator shall use this equipment in such a manner that the flow being monitored, as indicated below, does not exceed 300 CFM.

The operator shall install and maintain a flow indicator at the inlet to the carbon adsorption system to measure the total air flow rate through the carbon adsorbers in standard cubic feet per minute (scfm). If a pressure sensor device is used in place of the flow indicator, a conversion chart shall be made available to indicate the flow rate in scfm corresponding to the pressure reading.

[RULE 1303(a)(1)-BACT, 5-10-1996]

[Devices subject to this condition : C91]

- C6.6 The operator shall use this equipment in such a manner that the temperature being monitored, as indicated below, does not exceed 120 Deg F.

The operator shall install and maintain a thermocouple or other temperature measuring device to continuously measure and record the temperature of the vapor stream at the inlet to the primary carbon vessel. This temperature shall not exceed 120 degrees Fahrenheit.

[RULE 1303(a)(1)-BACT, 5-10-1996]

[Devices subject to this condition : C91]

D. Monitoring/Testing Requirements

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The operator shall comply with the terms and conditions set forth below:

D90.1 The operator shall periodically monitor the hydrocarbon concentration at the inlet of the first carbon according to the following specifications:

The operator shall sample once every day after the first 10 days of operation for twenty (20) days for VOC and speciated non-methane organic compounds.

Samples shall be collected at the inlet to the first carbon vessel and outlet of the second carbon vessel.

Sampling and analysis shall be conducted by an independent laboratory per Rule 304.

Sampling shall conform to CARB method 422 or equivalent. Samples with high moisture shall be collected using an appropriate method such as SCAQMD method 25.1/25.3 or other methods approved by SCAQMD.

Analysis shall be conducted using EPA method TO-15 or other method approved by SCAQMD.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1401, 9-10-2010]

[Devices subject to this condition : C91]

D90.2 The operator shall periodically monitor the hydrocarbon concentration at the inlet of the first carbon according to the following specifications:

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The operator shall comply with the terms and conditions set forth below:

The operator shall sample once per month after the first 30 days of operation for VOC and speciated for compounds listed under condition no. B27.3 and other toxic compounds present.

Samples shall be collected at the inlet of the first carbon vessel and outlet of the second carbon vessel.

Sampling and analysis shall be conducted by an independent laboratory per Rule 304.

Sampling shall conform to CARB method 422 or equivalent. Samples with high moisture shall be collected using an appropriate method such as SCAQMD method 25.1/25.3 or other methods approved by SCAQMD.

Analysis shall be conducted using EPA method TO-15 or other method approved by SCAQMD.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1401, 9-10-2010]

[Devices subject to this condition : C91]

E. Equipment Operation/Construction Requirements

E57.5 The operator shall vent this equipment to the acetone decanting tank whenever the tank washing operations are being conducted.

[RULE 1303(a)-BACT, 5-10-1996]

[Devices subject to this condition : D88]

E57.6 The operator shall vent this equipment to to the carbon adsorption system described in device id no. C91 whenever the vapors are being extracted from the soil.

[RULE 1166, 7-14-1995; RULE 1166, 5-11-2001; RULE 1303(a)(1)-BACT, 5-10-1996]

[Devices subject to this condition : C91]

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The operator shall comply with the terms and conditions set forth below:

E128.1 The operator shall keep all spent carbon in a tightly covered container which shall remain closed except when it is being transferred into or out of the container.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(b)(2)-Offset, 5-10-1996]

[Devices subject to this condition : C91]

E129.1 The operator shall only dispose liquid and solid waste from this equipment at an approved waste disposal site.

[Devices subject to this condition : D88]

E153.1 The operator shall change over the carbon in the adsorber whenever breakthrough occurs.

For the purpose of this condition, breakthrough occurs when the hydrocarbon monitor reading indicates a concentration of 5 ppmv at the outlet of the second carbon vessel.

The activated carbon used in the carbon vessels shall have a butane activity number of not less than 23.5 as measured by ASTM method 5742 or a CTC No. not less than 60% as measured by ASTM method D3467.

The system shall be shut down until the spent carbon vessel is replaced or replenished.

To change over the carbon, the operator shall replace the first carbon canister with a fresh carbon canister. After the new carbon canister is installed, it shall become the last carbon canister in series. The previous sequencing of the remaining carbon canisters shall remain the same.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(b)(2)-Offset, 5-10-1996]

[Devices subject to this condition : C91]

E448.1 The operator shall comply with the following requirements:

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The operator shall comply with the terms and conditions set forth below:

During cleaning cycle, at least 2.5 gallons of fresh acetone shall be used in the final rinse.

[**RULE 1303(b)(2)-Offset, 5-10-1996**]

[Devices subject to this condition : D88]

E448.2 The operator shall comply with the following requirements:

Upon completion, the vapor extraction wells and ducts shall be capped to prevent vapors from venting to the atmosphere

[**RULE 1166, 7-14-1995; RULE 1166, 5-11-2001; RULE 1303(a)(1)-BACT, 5-10-1996**]

[Devices subject to this condition : C91]

H. Applicable Rules

H23.6 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	1166

[**RULE 1166, 7-14-1995; RULE 1166, 5-11-2001**]

[Devices subject to this condition : C91]

K. Record Keeping/Reporting

K67.8 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

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The operator shall comply with the terms and conditions set forth below:

In order to claim any VOC emission credits from the spent acetone disposed of as hazardous waste for each calendar month, the operator shall:

- a. Remove spent solvent generated in the calendar month from Acetone decant tank for disposal within 14 days after the end of each calendar month;
- b. Determine and record the amount in gallons of spent solvent that is generated in each calendar month;
- c. Collect a sample from each waste storage container in accordance with AQMD approved methods prior to the offsite disposal of spent solvent;
- d. Submit the collected sample(s) to an independent laboratory for analysis of VOC and exempt compounds content, in lb./gallons in accordance with AQMD approved methods within 7 days after the sample is collected; and
- e. Maintain all waste records and lab results for a period of not less than two years.

[RULE 1303(b)(2)-Offset, 5-10-1996]

[Devices subject to this condition : D88]

- K67.9 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

All records required to demonstrate compliance with the conditions of this permit shall be maintained in a format acceptable to the District for a minimum of five years and shall be made available to the District personnel upon request

**[RULE 1166, 7-14-1995; RULE 1166, 5-11-2001; RULE 1303(a)(1)-BACT, 5-10-1996;
RULE 1401, 9-10-2010]**

[Devices subject to this condition : C91]

- K67.10 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

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The operator shall comply with the terms and conditions set forth below:

The operator shall submit to the District in writing the results of the first month of operating records, including but not limited to monitoring, lab analysis, flow, and temperature readings, etc. to prove compliance with the conditions of this permit. Submittal shall be within 45 days of start-up

**[RULE 1166, 7-14-1995; RULE 1166, 5-11-2001; RULE 1303(a)(1)-BACT, 5-10-1996;
RULE 1401, 9-10-2010]**

[Devices subject to this condition : C91]