YOLO-SOLANO AIR QUALITY MANAGEMENT DISTRICT
1947 Galileo Court, Suite 103, Davis, CA 95616
(530)757-3650

TITLE V PERMIT STATEMENT OF BASIS

PERMIT NUMBER: F-00254-5

ENGINEER: Nancy Fletcher

DATE: November 15, 2010

Facility Name:	Truck Accessories Group, LLC dba Leer West
Mailing Address:	1686 East Beamer Street Woodland, CA 95776
Location:	1686 East Beamer Street Woodland, CA
Responsible Official:	Jesus Bonilla
Title:	General Manager
Application Contact:	Danny Lahm
Phone:	(530) 666-0176 x3131

I. FACILITY DESCRIPTION

Leer West, Inc. manufactures and assembles truck caps and tonneau covers. The two major processes in the manufacturing of the caps are the fabrication of the cap and the painting of the cap. The caps are made by a process in which gel coat, ceramic resin, and fiberglass reinforced polyester resin are used to fabricate the cap. The painting occurs by use of a base coat/clear coat system with booth heaters used for drying. The support processes at the facility include adhesives application for the attachment of headliner carpet and various seals, combustion units for space heating, paint preparation activities, and cutting, sanding, and grinding of the unpainted caps.

II. INSIGNIFICANT EMISSIONS UNIT INFORMATION

Insignificant Emissions Units

Insignificant emissions units or exempted equipment may be supplemented, replaced or modified with non-identical equipment without notice provided exemption status has not changed as defined in current district or federal rules.

The equipment listed in Table 1 is a partial listing of equipment currently identified as exempt or insignificant and not required to obtain an operating permit pursuant to Rule 3.2 of the Yolo Solano Air Quality Management District.

Table 1. Exempted And Insignificant Emissions Units (partial listing)

Insignificant Equipment Description	Basis for Exemption
Fork Lifts	District Rule 3.2, Section 101.1
Office Air Conditioning System	District Rule 3.2, Section 103
Natural Gas Heaters < 1 MMBtu/hr	District Rule 3.2, Section 105.2
Repair and Maintenance Operations	District Rule 3.2, Section 108

III. Significant Emissions Unit Information

Each of the sources has been constructed pursuant to issuance of an authority to construct in accordance with District Rules 3.1 and 3.4.

Identification Number: **P-104-91(a2)**, Gel Coat and Lamination Processes

Equipment Description: Gel coat: Viking spray booth, Model #TDA 16-14-9, 14'W x 9'H x 52'D; various non-atomizing spray guns
Lamination: Two-sided Viking spray booth, 14.5'W x 17'H x 32'D; various non-atomizing spray guns
Ceramic Resin: Viking spray booth, 14.5'W x 9'H x 20'D; various non-atomizing spray guns

Control Equipment: Six (6) exhaust fans, 12,400 cfm each, with dry filter system, serving gel coat booth; two (2) exhaust fans, 12,500 cfm each, with dry filter system, serving lamination booth; one (1) exhaust fan, 14,400 cfm, serving ceramic resin booth

Identification Number: **P-108-91(a3)**, Repair and Re-work Paint Booth

Equipment Description:	19' x 12 ' x 28' paint spray booth with HVLP gun(s), enclosed gun washer, and one (1) 1 MMBtu/hr natural gas fired heater
Control Equipment:	Four (4) 12,000 CFM exhaust fans with dry filter system. Munters rotor concentrator catalytic oxidizer (RCCO), model #IZS-3546-CT, serving paint booth, and shared with P-23-93(a2). RCCO has one (1) 0.2 MMBtu/hr natural gas fired burner on the concentrator and one (1) 1.2 MMBtu/hr natural gas fired burner on the oxidizer.
Identification Number:	**P-109-91(a1)**, Ledge Area
Equipment Description:	Viking Booth, Dye grinder with diamond abrasive cutting wheel; miscellaneous cutting and grinding equipment
Control Equipment:	Water curtain serving booth with cutting wheel; Auto Vac vacuum and filter system serving cutting and grinding equipment
Identification Number:	**P-111-91(a2)**, Adhesives Use
Equipment Description:	HVLP spray gun for headliner application; various hand application equipment
Control Equipment:	None
Identification Number:	**P-23-93(a2)**, Main Paint Booth
Equipment Description:	8' x 25 ' x 116' paint spray booth with HVLP gun(s), enclosed gun washer, one (1) 2 MMBtu/hr natural gas fired heater, and one (1) 1 MMBtu/hr natural gas fired heater
Control Equipment:	Four (4) 10,500 cfm each exhaust fans with dry filter system; munters rotor concentrator catalytic

oxidizer (RCCO), Model No. IZS-3546-CT, serving the paint booth and shared with P-108-91(a1). RCCO has one (1) 0.2 MMBtu/hr natural gas fired burner on the concentrator and one (1) 1.2 MMBtu/hr natural gas fired burner on the oxidizer; dry filter system integral to RCCO

Identification Number: **P-34-04**, Space Heating

Equipment Description: One Precision Quincy natural gas fired heater, 1 MMBtu/hr, Model #18-60 AMU, Serial #98092

Control Equipment: None

Identification Number: **P-35-04**, Space Heating

Equipment Description: One Precision Quincy natural gas fired heater, 1 MMBtu/hr, Model #18-60 AMU, Serial #98094

Control Equipment: None

Identification Number: **P-36-04**, Space Heating

Equipment Description: One Weather Rite natural gas fired heater, 2 MMBtu/hr, Model #TOT-230-HHL, Serial #8263

Control Equipment: None

IV. Title V Applicability

The source has submitted an application for renewal of their Title V permit. The facility potential to emit exceeds the Title V threshold of 25 tons per year of VOC and 10 tons per year of a hazardous air pollutant (HAP) and is subject to the requirements of District Rule 3.8. The facility emission totals are listed below:

Criteria Pollutant Emissions (tons per year)

Emission Unit Name	VOC	CO	NO_x	SO_x	PM_{10}
P-104-91(a2)	51.50	0	0	0	3.09
P-108-91(a3)	10.00	0.88	1.05	0.01	0.75
P-109-91(a1)	0	0	0	0	5.26
P-111-91(a2)	4.70	0	0	0	1.43
P-23-93(a2)	10.00	1.62	1.93	0.01	0.82
P-34-04	0.02	0.37	0.44	Neg.	0.03
P-35-04	0.02	0.37	0.44	Neg.	0.03
P-36-04	0.05	0.74	0.88	0.01	0.07
P-108-91(a3) and P-23-93(a)*	10.00	1.98	2.37	0.02	1.52
Total	**66.49**	**3.46**	**4.13**	**0.03**	**11.43**

*The permits have a combined emissions cap and a fuel usage cap.

V. APPLICABLE FEDERAL REQUIREMENTS

RULE 2.3 Ringelmann Chart

Rule Description

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

Compliance Status

The rule applies to all emission units at the stationary source. The rule was adopted on October 1, 1971 and is part of the current California State Implementation Plan (SIP). The source is currently in compliance with the rule.

Requirement

The SIP approved version of Rule 2.3 reads:

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

a. As dark or darker in shade as that designated as No. 2 on the Ringelmann Chart, as published by the United States Bureau of Mines; or

b. Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subsection a. of this rule."

Subsuming Demonstration: On January 13, 2010, the District revised Rule 2.3 and is currently taking steps to include the revised rule in the SIP. The revised version of the rule reads:

"301.2 Effective six months after the adoption of the revisions of this rule, a person shall not discharge into the atmosphere from any single source of emission whatsoever, any air contaminant for a period or periods aggregating more than 3 minutes in any one hour which is:

a. As dark or darker in shade as that designated as No. 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 subsection 301.2a. of this rule."

Until the revised rule is included in the plan, the requirements of the current SIP rule can be subsumed by the authority of District Rule 3.1, General Permit Requirements.

The following permits are subject to a 20% opacity limitation on visible emissions based on the authority of District Rule 3.1 Section 402, which constitutes a federally enforceable requirement which is more stringent than the SIP approved requirement of Rule 2.3. Therefore the Rule 2.3 requirement can be subsumed by the Rule 3.1 requirement.

Table 1: Table of PTOs and Corresponding ATCs

PTOs and Corresponding ATCs				
PTO Number	**ATC Number**		**PTO Number**	**ATC Number**
P-104-91(a2)	**C-05-33**		**P-23-93(a2)**	**C-09-144**
P-108-91(a3)	**C-09-143**		**P-34-04**	**C-03-139**
P-109-91(a1)	**C-03-93**		**P-35-04**	**C-03-140**
P-111-91(a2)	**C-04-165**		**P-36-04**	**C-03-141**

Subsuming Permit Condition

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

a. As dark or darker in shade as that designated as No. 1 on the Ringelmann Chart; or
b. Greater than 20% opacity. [District Rule 2.3 and 3.1]

Subsuming Demonstration: The following permits are subject to a 5% opacity limitation on visible emissions based on the authority of District Rule 3.4, New Source Review. This limitation constitutes a federally enforceable requirement which is more stringent than the SIP approved requirement of Rule 2.3. Therefore the Rule 2.3 requirement can be subsumed by the Rule 3.4 requirement.

Table 2: Table of PTOs and Corresponding ATCs

PTOs and Corresponding ATCs				
PTO Number	ATC Number		PTO Number	ATC Number
P-104-91(a2)	C-05-33		**P-109-91(a1)**	C-03-93
P-108-91(a3)	C-09-143		**P-23-93(a2)**	C-09-144

Subsuming Permit Condition

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

a. As dark or darker in shade than No. 1/4 on the Ringelmann Chart; or
b. Greater than 5% opacity. [District Rule 3.4]

RULE 2.5 Nuisance

Rule Description

This rule requires that sources are not a public nuisance.

Compliance Status

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

Permit Condition

The permit holder shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health, or safety of any such persons or the public or which cause to have a natural tendency to cause injury or damage to business or property. [The following permit condition is federally enforceable because it derives from District Rule 2.5 - Nuisance that is currently part of the California State Implementation Plan (SIP). The District is taking steps to remove Rule 2.5 from the SIP. Once the U.S. EPA has taken final action to remove District Rule 2.5 from the SIP, this permit condition will become state-enforceable only]

RULE 2.11 Particulate Matter

Rule Description

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

Compliance Status

This rule applies to the following emission units at the source: P-108-91(a3) (painting - R&R booth), P-109-91(a1) (ledge processes), P-23-93(a2) (painting - main booth), P-104-91(a2) (lamination), P-34-04 (space heating), P-35-04 (space heating), and P-36-04 (space heating). The rule was adopted on June 19, 1974 and is part of the current SIP. The source is currently in compliance with the rule.

Requirement

The SIP approved version of Rule 2.11 reads:

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

Subsuming Demonstration: On January 13, 2010, the District revised Rule 2.11 and is currently taking steps to include the revised rule in the SIP. The revised version of the rule reads:

> *"A person shall not release or discharge into the atmosphere, from any single source operation, dust fumes or total suspended particulate matter emissions in excess of 0.1 grain per cubic foot of gas at dry standard conditions."*

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

P-104-91(a2)
The District Rule 3.4 requirement in P-104-91(a2) (lamination) is 34.6 lb/day PM10. The corresponding emission concentration is calculated below using the 14,400 cfm rating of the spray booth:

=34.6 lb PM10/day * 7,000 grains/lb * 1 day/24 hr * 1 min/14,400 cubic feet * 1 hour/60 min = 0.01 gr/dscf

P-108-91(a3)
The District Rule 3.4 requirement in P-108-91(a3)/C-09-143 (painting - R&R booth) is 0.4 lb/day PM10 from combustion. The corresponding emission concentration is calculated below using the 2.4 mmBTU/hr rating for the natural gas fired burners on the permit listed above and mmBtu/8,710 dscf (F Factor from 40 CFR 60 Appendix A Table 19-1):

=0.4 lb PM10/day * day/24 hours *1 hr/2.4 MMBtu * MMBtu/8,710 dscf * 7,000 grains/lb = 0.006 gr/dscf

The District Rule 3.4 requirement in P-108-91(a3)/C-09-143 (painting - R&R booth) is 5.4 lb/day PM 10 from spraying of paint (non-combustion). The AP-42 Appendix C PM10 fraction is 46.7%. The corresponding emission concentration is calculated below using the 48,000 cfm rating of the spray booth:

=5.4 lb PM10/day * 1/0.467 PM Fraction * 7,000 grains/lb * 1 day/24 hr * 1 min/48,000 cubic feet * 1 hour/60 min = 0.001 gr/dscf

0.006 gr/dscf + 0.001 gr/dscf = 0.007 gr/dscf total.

P-23-93(a2)
The District Rule 3.4 requirement in P-23-93(a2)/C-09-144 (painting - main booth) is 0.2 lb/day PM10 from combustion. The corresponding emission concentration is calculated below using the 4.4 mmBTU/hr rating for the natural gas fired burners on the permits listed above and mmBtu/8,710 dscf (F Factor from 40 CFR 60 Appendix A Table 19-1):

=0.8 lb PM10/day * 7,000 grains/lb * 1 day/1,440 min * MMBtu/8,710 dscf * 1 hr/4.4 MMBtu * 60 min/hour = 0.006 gr/dscf

The District Rule 3.4 requirement in P-23-93(a2)/C-09-144 (painting - main booth) is 5.4 lb/day PM10 from spraying of paint. The AP-42 Appendix C PM10 fraction is 46.7%. The corresponding emission concentration is calculated below using the 42,500 cfm rating of the spray booth:

=5.4 lb PM10/day * 1/0.467 PM Fraction * 7,000 grains/lb * 1 day/24 hr * 1 min/48,000 cubic feet * 1 hour/60 min = 0.001 gr/dscf

0.006 gr/dscf + 0.001 gr/dscf = 0.007 gr/dscf total.

P-34-04
The District Rule 3.4 requirement in P-34-04 is 0.2 lb/day PM10. The corresponding emission concentration is calculated below using the 1.0 mmBTU/hr rating for the natural gas fired burner on the permit listed above and mmBtu/8,710 dscf (F Factor from 40 CFR 60 Appendix A Table 19-1):

=0.2 lb PM10/day * 7,000 grains/lb * 1 day/1,440 min * MMBtu/8,710 dscf * 1 hr/1.0 MMBtu * 60 min/hour = 0.007 gr/dscf

P-35-04
The District Rule 3.4 requirement in P-35-04 is 0.2 lb/day PM10. The corresponding emission concentration is calculated below using the 1.0 mmBTU/hr rating for the natural gas fired burner on the permit listed above and mmBtu/8,710 dscf (F Factor from 40 CFR 60 Appendix A Table 19-1):

=0.2 lb PM10/day * 7,000 grains/lb * 1 day/1,440 min * MMBtu/8,710 dscf * 1 hr/1.0 MMBtu * 60 min/hour = 0.007 gr/dscf

P-36-04
The District Rule 3.4 requirement in P-36-04 is 0.4 lb/day PM10. The corresponding emission concentration is calculated below using the 2.0 mmBTU/hr rating for the natural gas fired burner on the permit listed above and mmBtu/8,710 dscf (F Factor from 40 CFR 60 Appendix A Table 19-1):

=0.4 lb PM10/day * 7,000 grains/lb * 1 day/1,440 min * MMBtu/8,710 dscf * 1 hr/2.0 MMBtu * 60 min/hour = 0.007 gr/dscf.

Permit Condition

No permit conditions are required. All requirements of this rule have been subsumed by New Source Review requirements.

RULE 2.12 Specific Contaminants

Rule Description

This rule specifies the allowable sulfur dioxide and particulate matter combustion contaminant emission rates at standard conditions. For the purposes of this evaluation, the sulfur oxide (SO_x) emissions are considered to be 100% SO_2.

Compliance Status

This rule applies to the following emissions units: P-108-91(a3) (painting - R&R booth), P-23-93(a2) (painting - main booth), P-34-04 (space heating), P-35-04 (space heating), and P-36-04 (space heating). The Rule was adopted on January 21, 1972 and is included in the current SIP. The source is currently in compliance with the rule.

Requirement

The SIP approved version Rule 2.12 reads:

> *"A person shall not discharge into the atmosphere from any single source of emission whatsoever, any one or more of the following contaminants, in any state or combination thereof, in excess of the following concentrations at the point of discharge:*
>
> *A. Sulfur compounds calculated as sulfur dioxide (SO_2) 0.2%, by volume at standard conditions.*
>
> *B. Particulate Matter Combustion Contaminants: 0.3 grains per cubic foot of gas calculated to 12 percent of carbon dioxide (CO_2) at standard conditions, except during the start of an operation or change in energy source, during the necessary to bring the combustion process up to operating level. In measuring the combustion contaminants from incinerators used to dispose of combustible refuse by burning, the carbon dioxide (CO_2) produced by combustion of any liquid of gaseous fuels shall be excluded from the calculation to 12 percent of carbon dioxide (CO_2)."*

Subsuming Demonstration: On January 13, 2010, the District revised Rule 2.12 and is currently taking steps to include the revised rule in the SIP. The revised version of the rule reads:

> *"A person shall not discharge into the atmosphere from any single source of emission whatsoever, any one or more of the following contaminants, in any state or combination thereof, in excess of the following concentrations at the point of discharge:*
>
> *A. Sulfur compounds calculated as sulfur dioxide (SO_2) 0.2%, by volume at standard conditions.*
>
> *B. Particulate Matter Combustion Contaminants: 0.1 grains per cubic foot of gas calculated to 12 percent of carbon dioxide (CO_2) at standard conditions."*

Until the revised rule is included in the plan, the requirements of the current SIP rule can be subsumed by the authority of District Rule 3.4, New Source Review. The requirements for particulate matter have been subsumed by the previous rule demonstration. Subsuming demonstrations for SO_2 is shown below for the applicable source categories.

P-108-91(a3)
The District Rule 3.4 requirement in P-108-91(a3)/C-09-143 is negligible (or below 0.1) lb/day SOx. The corresponding emission concentration is determined below using the 2.4 mmBTU/hr rating for the natural gas fired burners on the permit listed above and mmBtu/8,710 dscf (F Factor from 40 CFR 60 Appendix A Table 19-1):

=0.1 lb/day * day/24 hours * hour/2.4 mmBtu * mmBtu/8,710 dscf * 379 dscf SO_2/mole * mole/64 lb SO_2 * 100 = 0.00012%

P-23-93(a)
The District Rule 3.4 requirement in P-23-93(a2)/C-09-144 is 0.1 lb/day SOx. The corresponding emission concentration is determined below using the 4.4 mmBTU/hr ratings for the natural gas fired burners on the permit listed above and mmBtu/8,710 dscf (F Factor from 40 CFR 60 Appendix A Table 19-1):

=0.1 lb/day * day/24 hours * hour/4.4 mmBtu * mmBtu/8,710 dscf * 379 dscf SO_2/mole * mole/64 lb SO_2 * 100 = 0.00006%

P-34-04

The District Rule 3.4 requirement in P-34-04 is negligible (or below 0.1) lb/day SOx. The corresponding emission concentration is determined below using the 1 mmBTU/hr rating for the natural gas fired burner on the permit listed above and mmBtu/8,710 dscf (F Factor from 40 CFR 60 Appendix A Table 19-1):

=0.1 lb/day * day/24 hours * hour/1 mmBtu * mmBtu/8,710 dscf * 379 dscf SO_2/mole * mole/64 lb SO_2 * 100 = 0.0003%

P-35-04
The District Rule 3.4 requirement in P-35-04 is negligible (or below 0.1) lb/day SOx. The corresponding emission concentration is determined below using the 1 mmBTU/hr rating for the natural gas fired burner on the permit listed above and mmBtu/8,710 dscf (F Factor from 40 CFR 60 Appendix A Table 19-1):

=0.1 lb/day * day/24 hours * hour/1 mmBtu * mmBtu/8,710 dscf * 379 dscf SO_2/mole * mole/64 lb SO_2 * 100 = 0.0003%

P-36-04
The District Rule 3.4 requirement in P-36-04 is negligible (or below 0.1) lb/day SOx. The corresponding emission concentration is determined below using the 2 mmBTU/hr rating for the natural gas fired burner on the permit listed above and mmBtu/8,710 dscf (F Factor from 40 CFR 60 Appendix A Table 19-1):

=0.1 lb/day * day/24 hours * hour/1 mmBtu * mmBtu/8,710 dscf * 379 dscf SO_2/mole * mole/64 lb SO_2 * 100 = 0.0003%

Permit Condition

No permit conditions are required. All requirements of the rule have been subsumed by District Rule 3.4 (New Source Review) requirements.

RULE 2.13 Organic Solvents

Rule Description

The purpose of this rule is to limit the emissions of organic solvents into the atmosphere that may result from the use of organic solvents.

Compliance Status

The following emissions sources are exempt from the rule pursuant to section 110.2 of the rule: P-104-91(a1) (lamination), P-108-91(a3) (painting - R&R booth), P-109-91(a1) (ledge processes), P-111-91(a1), P-23-93(a2) (painting - main booth), P-34-04 (space heating), P-35-04 (space heating), and P-36-04 (space heating). Section 110.2 of the rule states that if the emission unit is already subject to other requirements for that emission unit, then the unit is exempt from the requirements of this rule. P-108-91(a3) (painting - R&R booth) and P-23-93(a2) (painting - main booth) are subject to District Rule 2.26, P-111-91(a1) (adhesives use) is subject to District Rule 2.33, and P-104-91(a1) (lamination) is subject to District Rule 2.30.
All other emissions units at the facility do not use organic solvents in the process.

Permit Condition

No permit conditions are required.

RULE 2.17 Circumvention

Rule Description

This rule prevents sources from concealing emissions to the atmosphere.

Compliance Status

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

Permit Condition

The permit holder shall not build, erect, install or use any article, machine, equipment, or other contrivance, the use of which, without resulting in a reduction in the total release of air contaminants to the atmosphere, reduces

or conceals an emission which would otherwise constitute a violation of Division 26, Part 3 and Part 4 of the Health and Safety Code of the State of California or District Rules or Regulations. [District Rule 2.17]

RULE 2.25 Metal Parts and Products Coating Operations

Rule Description

The purpose of this rule is to limit the emission of volatile organic compounds in metal parts and products coating operations.

Compliance Status

The rule was originally adopted on February 8, 1980. The rule was amended on April 27th 1994 and is part of the current SIP. This rule is not applicable to the source pursuant to Section 114 of the rule. The section exempts coating operations subject to the requirements of Rule 2.26.

Permit Condition

No permit conditions are required.

RULE 2.26 Motor Vehicle and Mobile Equipment Coating Operations

Rule Description

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

Compliance Status

This rule is applicable to both P-108-91(a3) (painting - R&R booth) and P-23-93(a2) (painting - main booth). The rule was originally adopted on April 27, 1994. The rule was revised on November 9th 1994 and is part of the current SIP. The facility is currently in compliance with the rule.

Subsuming Demonstration: The District has revised District Rule 2.26 three times since the rule was adopted in the SIP. The most current revision dates December 10, 2008. Additionally, surface preparation and cleanup provisions were removed from the rule and placed in District Rule 2.31, Surface Preparation and Cleanup. Until the revised versions of Rule 2.25 and 2.31 are included in the plan, the following requirements of the current SIP rule can be subsumed by the authority of District Rule 3.4, New Source Review.

Rule Requirement -Limits

Section 301 of the rule reads:

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

Subsuming Permit Conditions

P-108-91(a3) (painting - R&R booth) and P-23-93(a2) (painting - main booth) All painting shall be conducted in the booth with the RCCO operating. The RCCO shall remain fully interlocked with the spray gun air supply to prevent painting without the RCCO operating. [District Rule 3.4]

The RCCO shall destroy a minimum of 95% of VOC emissions from the paint booth. [District Rule 3.4]

The Permit Holder shall utilize booth exhaust particulate filters that are at least 95% efficient, as documented by the filter certification sheet. [District Rule 3.4]

The Rule 2.26 requirements are subsumed by the more stringent Rule 3.4.

Rule Requirement -Transfer Efficiency

Section 303 of the rule reads:

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

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

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

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

Subsuming Permit Conditions

P-108-91(a3) (painting - R&R booth) and P-23-93(a) (painting - main booth)
The Permit Holder shall not apply any coating to any Group I or Group II vehicles or mobile equipment or their parts and components unless electrostatic or high volume low pressure (HVLP) application equipment is used. [District Rule 2.26, §302/C-09-143 and C-09-144]

The Rule 2.26 requirements are subsumed by the more stringent Rule 3.4.

Rule Requirement -Surface Preparation and Clean-Up Solvent

Section 304 of the rule reads:

"The requirements of this section shall apply to any person using solvent for surface preparation and cleanup effective October 27, 1994.

304.1 A person shall not use an organic compound for surface preparation with a VOC content in excess of 200 grams per liter (1.67 pounds per gallon).

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

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

304.4 A person shall not use organic compounds for the cleanup of spray equipment including paint lines unless an enclosed system or other system that has been demonstrated to be at least equivalent to an enclosed system and has been approved in writing by the Air Pollution Control Officer is used for cleanup. The system must enclose spray guns, cups, nozzles, bowls and other parts during washing, rinsing and draining procedures and utilize non-atomized solvent flow to flush the spray equipment. Equipment used shall minimize the evaporation of organic compounds to the atmosphere."

Subsuming Permit Conditions

P-108-91(a3) (painting - R&R booth) and P-23-93(a) (painting - main booth)

The maximum VOC content of solvents used for surface preparation and cleanup, including product cleaning, repair and maintenance cleaning and the cleaning of application equipment, without the use of the RCCO, shall not exceed 50 g/l (0.21 lb/gallon). [District Rule 2.31, §301 and §307 and 3.1/C-09-143 and C-09-144]

The Permit Holder shall store all VOC-containing materials used in the coating operation (including coatings, catalysts, thinners, reducers and solvents), in non-absorbent, non-leaking containers. The containers are to be kept closed at all times except when filling or emptying. [District Rule 3.4/C-09-143 and C-09-144]

The Permit Holder shall use closed containers for the disposal of cloth, paper, or other VOC laden materials (including solvent and spent solvent used for surface preparation, clean-up, and paint removal). [District Rule 3.4/C-09-143 and C-09-144]

The Permit Holder shall not use organic compounds, with a VOC content greater than 25 g/l, for the cleanup of spray equipment, without the use of the RCCO, unless the spray equipment is disassembled and cleaned in an enclosed gun washer or other low emission washing system that has been demonstrated to be at least equivalent to an enclosed system. [District Rule 2.31, §306 and §307/C-09-143 and C-09-144]

The Rule 2.26 requirements are subsumed by the more stringent Rule 3.4.

Rule Requirement -Records

Section 507 of the rule reads:

"Any person subject to Sections 301.1, 301.2, 304, and 305 of this Rule shall comply with the following requirements:

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

507.2 The person shall maintain and have available during an inspection, a current list of coatings in use which provides all of the coating data necessary to evaluate compliance, including the following information, as applicable:

a. Coating, catalyst, additives, and reducer used.

b. Mix ratio of components used.

c. VOC content of coating as applied.

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

507.4 The person shall maintain records on a monthly basis showing the type and amount of solvent used for cleanup and surface preparation.

507.5 Any person complying with the provisions of Sections 301 or 302 of this Rule by using air pollution control equipment shall maintain daily records of key system operating parameters, such as temperatures, pressures, and/or flowrates for the emissions control equipment which will demonstrate continuous operation and compliance of that equipment during periods of emission producing activities.

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

Subsuming Permit Conditions
P-108-91(a3) (painting - R&R booth) and P-23-93(a) (painting - main booth)

For the coating processes and related activities operating under C-09-143 and C-09-144, when determining compliance with the daily, quarterly, and yearly permitted process VOC limit, the source shall use the following equation [District Rule 3.4]:

$\sum$((OB x OBvoc) + (IB x IBvoc x (1-CE/100)) = VOC from coating processes (lbs)

where:

OB = amount of solvent (or other material) used outside booths (gallons)

OBvoc = VOC content of (OB) material used (lb/gallon)
CE = control efficiency of RCCO = 95%
IB = amount of paint (or other material) used inside booth (gallons)
IBvoc = VOC content of (IB) material used (lb/gallon)

The paint booths shall be equipped with magnahelic gauges. These gauges shall be read at least once per operating day, while the booth is operating, and shall be recorded in a log. [District Rule 3.1, §402/C-09-143 and C-09-144]

The Permit Holder shall continuously monitor and record both the temperature of the desorption air stream and the temperature of the catalytic oxidizer. [District Rule 3.4/C-09-143 and C-09-144]

The Permit Holder shall maintain a daily log of coating use for P-108-91(a3) and P-23-93(a2) combined. This log shall include coating category, coating name, amount of each coating used, and VOC contents as applied for each coating. [District Rule 2.26, §501/C-09-143 and C-09-144]

The Permit Holder shall maintain daily records of critical faults and shutdowns of the RCCO. These records shall contain the date, the time of the critical fault or shutdown, the duration, and the reason for the fault or shutdown. [District Rule 3.1, §402/C-09-143 and C-09-144]

The Permit Holder shall maintain daily records showing the type, name, and amount of solvent used for cleanup and surface preparation. [District Rule 3.1, §402/C-09-143 and C-09-144]

All required records shall be retained for a minimum of five years and shall be made available for District inspection upon request. [District Rule 3.1, §402/C-09-143 and C-09-144]

The Rule 2.26 requirements are subsumed by the more stringent Rule 3.4.

RULE 2.27 Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters

Rule Description

The purpose of this rule is to provide a control measure to limit emissions of NOx and CO from industrial, institutional, and commercial boilers, steam generators, and process heaters in conformance with BARCT determinations approved by the California Air Resources Board to meet the requirements of the California Clean Air Act.

Compliance Status

There are process heaters on the following permit units: P-108-91(a3) (painting - R&R booth), P-23-93(a2) (painting - main booth), P-34-04 (space heating), P-35-04 (space heating), and P-36-04 (space heating). Each of these heaters is less than 5 MMBtu/hr heat input and are, therefore, exempt from this rule pursuant to section 102 of the rule.

Permit Condition

No permit conditions are required.

RULE 2.30 Polyester Resin Operations

Rule Description

The purpose of this Rule is to control VOC emissions from polyester resin operations.

Compliance Status

This rule is applicable to P-104-91(a1) (lamination). The rule was originally adopted on August 25, 1993. The rule was amended on April 14th 1999 and is part of the current SIP. The source is currently in compliance with the rule.

Subsuming Demonstration: The District has revised District Rule 2.30 since the rule was adopted in the SIP. The most current revision dates May 14, 2008. Additionally, surface preparation and cleanup provisions were removed from the rule and placed in District Rule 2.31, Surface Preparation and Cleanup. Until the revised versions of Rule 2.30 and 2.31 are included in the plan, the following requirements of the current SIP rule can be subsumed by

the authority of either District Rule 3.1, General Permit Requirements or District Rule 3.4, New Source Review.

Rule Requirement -Requirements

Section 301 of the rule reads:

"Any person operating a polyester resin operation shall comply with one or more of the following, as applicable:

301.1 The use of polyester resin material with a monomer content of no more than 35 percent by weight and low VOC gel coat with a monomer content of no more than 45 percent by weight and low VOC specialty resins and clear gel coat with a monomer content of no more than 50 percent by weight, as applied and as determined by the manufacturer's specification;

301.2 The use of a resin containing a vapor suppressant, such as that weight loss from VOC emissions does not exceed 60 grams per square meter of exposed surface area during resin polymerization; as determined by Section 501.1;

301.3 The use of a closed-mold system;

301.4 Polyester resin operations shall install and operate an emissions control system which is designed and operated for the collection of fugitive emissions from polyester resin material and which system is approved by the District, and has a control device with a overall control and capture efficiency of 85 percent or more on a mass basis as determined by Sections 501.2 and 501.7; and

301.5 Only airless, air-assisted airless, high volume-low pressure, or electrostatic spray equipment shall be used for the application of polyester resin materials in spraying operations."

Subsuming/Streamling Permit Conditions

P-104-91(a2)

Only non-atomized spray equipment shall be used for all lamination (including ceramic resin) and gel coat operations at the facility. [District Rule 3.4/C-05-33]

The Permit Holder shall not utilize any polyester resin material with a monomer content more than 35 percent by weight. [District Rule 2.30, §301.1/C-05-33]

The Permit Holder shall not utilize any gel coat material with a monomer content more than 35 percent by weight. [District Rule 3.4/C-05-33]

The Rule 2.30 requirements are streamlined by the requirements of Rule 3.4.

Rule Requirement -Cleaning Material Requirements/Storage and disposal Requirements

Section 302 of the rule reads:

> *"Where the use of cleaning materials containing more than 1.7 pounds per gallon of VOC material as applied and as determined by Section 501.3 or having a initial boiling point less than 190°C, as determined by Section 501.4, exceeds four (4) gallons per day, a cleaning material reclamation system shall be used. Such a reclamation system shall operate at least 80 percent efficiency. Solvent residues for on-site reclamation systems shall not contain more than 20 percent VOC by weight as determined by Section 501.5."*

Section 303 of the rule reads:

"303.1 Closed containers shall be used for the storage of all polyester resin materials, cleaning materials, and any unused VOC-containing materials except when being accessed for use.

303.2 Self-closing containers shall be used in such a manner to effectively control VOC emissions to the atmosphere for the

disposal of all polyester resin materials, cleaning materials, waste materials, and any unused VOC-containing materials."

Subsuming Permit Conditions

All VOC -containing materials, whether in its form for intended use or as a waste or used product, including items such as cloth or paper laden with VOC containing materials, shall be stored in non-absorbent, non-leaking containers which shall be kept closed at all times, except when filling or emptying, and disposed of in a manner to prevent evaporation of VOCs into the atmosphere at the facility. [District Rule 2.30, §304 and 3.1 §402]

The maximum as-applied VOC-content of solvents used for product cleaning and general maintenance and repair operations shall not exceed 25 g/L (0.21 lb/gallon). [District Rule 3.1 §402]

The Rule 2.30 requirements are subsumed by the more stringent requirements of Rule 3.1.

Rule Requirement -Records

Section 502 of the rule reads:

"Any person subject to this Rule shall comply with the following requirements:

502.1 A person shall maintain, or have available, a current list of polyester resins and cleaning materials in use which provides all of the data necessary to evaluate compliance, including the following information:

a. Polyester resin, catalyst, and cleaning materials used;

b. The weight percent of VOC in each of the polyester resin materials, and the grams of VOC per liter for the cleaning materials;

c. For approved vapor suppressed resins, the weight loss (grams per square meter) during resin polymerization, the monomer percentage, and the gel time for each resin;

d. The amount of each of the polyester resin materials and cleaning materials used during each day of operations;

e. The volume of polyester resin materials and cleaning materials used for touch-up and repair during each day of operation; and

f. Records of hours of operation and key operating parameters for any emissions control system.

502.2 All records required by this Rule shall be retained and made available for inspection by the Air Pollution Control Officer for the previous 24 month period."

Subsuming Permit Conditions

The Permit Holder shall maintain purchase records for the gel coat and lamination booth exhaust filters. These records shall be retained for a period of at least five years and shall be made available to District personnel upon request. [District Rule 3.1, §402/C-05-33]

The Permit Holder shall maintain a current list of VOC containing material used in this operation and the weight percent of VOC in each material. These records shall be retained for a period of at least five years and shall be made available to District personnel upon request. [District Rule 2.30, §303.1/C-05-33]

The Permit Holder shall maintain daily records of the amount of each of the polyester resin materials and cleaning materials used, the VOC content of each, and the corresponding VOC emissions. These records shall be retained for a period of at least five years and shall be made available to District personnel upon request. [District Rule 2.30, §303.1 & District Rule 3.8, §302.6/C-05-33]

The Rule 2.30 requirements are subsumed by the more stringent requirements documented above.

RULE 2.31 Surface Preparation and Cleanup

Rule Description

The purpose of this rule is to limit the emissions of VOC from solvent cleaning operations, and from the storage and disposal of materials used in solvent cleaning operations. This rule applies to any owner or operator of any facility that uses VOC-containing materials in the production, repair, maintenance, or servicing of parts, products, tools, machinery, equipment, or general work areas or that stores and/or disposes of VOC-containing materials used in solvent cleaning operations.

Compliance Status

This Rule is applicable to P-104-91(a1) (lamination), P-108-91(a3) (painting - R&R booth), P-23-93(a) (painting - main booth), and P-111-91(a1) (adhesives use). The rule was originally adopted on April 27, 1994 and is part of the current SIP. The source is currently in compliance with the rule.
The facility is in compliance with the requirements of the rule.

Subsuming Demonstration: May 14, 2008 is the date of the most current District revision to Rule 2.31. Until the revised rule is included in the SIP, the current SIP rule is subsumed by the Authority of either District Rule 3.1 or District Rule 3.4, New Source Review.

Rule Requirement -Requirements

Section 301 of the rule reads:

*"**SOLVENT REQUIREMENTS**: A person shall not use a solvent to perform solvent cleaning operations, including the use of cleaning devices or methods, unless the solvent complies with the applicable requirements set forth below:*

301.1 On or after January 1, 1996, the solvents used on substrates during the manufacturing process or for surface preparation prior to coating, adhesive, or ink applications shall have a VOC content of 200 grams or less of VOC per liter of material.

301.2 On and after January 1, 1996, the solvents used for maintenance and repair cleaning shall have a VOC content of 900 grams or less of VOC per liter of material and a

VOC composite partial pressure of 20 mm Hg or less at 20°C (68°F).

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

301.4 On and after January 1, 1996, the solvents used for cleaning polyester resin application equipment shall comply with one of the limits specified below:

a. The solvent shall have a VOC content of 200 grams or less of VOC per liter of material;

b. The solvent shall have a VOC content of 1100 grams or less of VOC per liter and a VOC composite partial pressure of 1.0 mm Hg or less at 20°C (68°F); or

c. A solvent reclamation system shall be used if the solvent exceeds the limits of Sections 301.4.a and 301.4.b, and the solvent usage at the facility exceeds four gallons on any one day. The reclamation system shall operate at least at 80 percent efficiency, on a mass basis. The solvent residues for on-site reclamation systems shall not contain more than 20 percent VOC, by weight.

301.5 On and after January 1, 1996, the solvent used for cleaning of ink application equipment in graphic arts shall meet the limits specified below:

a. The solvents used in screen printing shall have a VOC content of 1070 grams or less of VOC per liter of material and a VOC composite partial pressure of 5 mm Hg or less at 20°C (68°F).

b. The solvents used in lithographic and letterpress printing not subject to the provisions of Section 301.5.d shall have a VOC content of 900 grams or less of VOC per liter of material and a VOC

composite partial pressure of 25 mm Hg or less at 20°C (68°F).

c. The solvents used in graphic arts printing operations not subject to the provisions of Sections 301.5.a, 301.5.b, or 301.5.d shall have a VOC content of 100 grams or less of VOC per liter of material and a VOC composite partial pressure of 3 mm Hg or less at 20°C (68°F).

d. The solvents used in graphic arts printing operations, except screen printing to remove ultraviolet inks from application equipment, shall have a VOC content of 800 grams or less of VOC per liter of material and a VOC composite partial pressure of 33 mm Hg or less at 20°C (68°F).

301.6 On and after January 1, 1996, the solvents used for manufacturing or maintenance cleaning of electronic assemblies shall have a VOC content of 900 grams or less of VOC per liter of material and a VOC composite partial pressure of 33 mm Hg or less at 20°C (68°F)."

Subsuming Permit Conditions

P-111-91(a2)
The maximum VOC content of solvents used for surface preparation and cleanup, including product cleaning, repair and maintenance cleaning and the cleaning of application equipment shall not exceed 25 g/l (0.21 lb/gallon). [District Rule 3.1, §402 and 2.31]

The requirements of Rule 2.31have been subsumed by the more stringent Rule 3.1 requirement.

Subsuming demonstrations for the other applicable permits are demonstrated in the other rule discussions.

RULE 2.33 Adhesive Operations

Rule Description

The purpose of this rule is to limit the emissions of volatile organic compounds (VOC) from the use of adhesives, sealants, adhesive primers, sealant primers, and from the related use of solvents in the application of adhesives.

Compliance Status

This rule is applicable to P-111-91(a2) (adhesives use) The rule was adopted on September 14, 1994, and is part of the SIP. The source is currently in compliance with the rule.

Subsuming Demonstration: The District has revised District Rule 2.33 since the rule was adopted in the SIP. The most current revision dates May 14, 2008. Additionally, surface preparation and cleanup provisions were removed from the rule and placed in District Rule 2.31, Surface Preparation and Cleanup. Until the revised versions of Rule 2.33 and 2.31 are included in the plan, the following requirements of the current SIP rule can be subsumed by the authority of District Rule 3.4, New Source Review.

Rule Requirement -Process and Control Requirements

Section 301 of the rule reads:

> *"The VOC content of adhesives used for specific applications, except as provided in Sections 301.3 and 301.4 of this Rule, shall not exceed the limits set forth in **Table 1**, expressed as grams of VOC per liter less water and exempt compounds, as applied.*

Table 1		
LIMITS ***VOC - Less Water and Less Exempt Compounds*** ***(Grams per Liter)***		
Applications	***Effective September 14, 1995***	***Effective January 1, 1997***
Multipurpose Construction	*200*	
Indoor Floor Covering Installation	*150*	
Ceramic Tile Installation	*150*	*130*
Single-Ply Roof Material Installation	*650*	*250*
Structural Glazing	*100*	
Plastic Cement Welding Adhesive/Primer	*650*	*450*

Table 1		
LIMITS ***VOC - Less Water and Less Exempt Compounds*** ***(Grams per Liter)***		
Solvent Welding Adhesive/Primer	*650*	*450*
Adhesive and Wash Primers	*250*	
Staple and Nail Manufacturing	*640*	

*301.2 Effective September 14, 1995, the VOC content of adhesives, except as provided in Sections 301.1, 301.3 and 301.4 of this Rule shall not exceed the limits set forth in **Table 2,** expressed as grams of VOC per liter less water and exempt compounds, as applied.*

Table 2	
Material Bonded	***Grams VOC per Liter***
Metal to Metal	*30*
Porous Materials	*150*
Plastic Foam	*120*
All Other Substrates	*250*

*The higher of the two limits from **Table 2** applies to the bonding of two dissimilar substrates."*

Subsuming Permit Condition

The Permit Holder shall not apply any adhesive, sealant, or primer with a VOC content in excess of the following limits: [District Rule 2.33, §301/C-04-165]

TABLE 1. MATERIAL VOC CONTENT LIMITS[1]

Category:	VOC Limit g/l (lb/gal)
Adhesives:	
Contact Bond	250 (2.1)
Contact Bond-Specialty Substrates	250 (2.1)
Multipurpose Construction	200 (1.7)
Other Plastic Cement Welding	450 (3.8)
Top & Trim Installation	540 (4.5)
Waterproof Resorcinol	170 (1.4)
Sealants:	
Other Sealants Not Listed	420 (3.5)

Category:	VOC Limit g/l (lb/gal)
Adhesive Primers:	
Automotive Glass	700 (5.8)
Plastic Cement Welding	450 (3.8)
Other Adhesive Primers Not Listed	250 (2.1)
Sealant Primers:	
Other Sealant Primers Not Listed	750 (6.3)

TABLE 2. ADHESIVE SUBSTRATE VOC CONTENT LIMITS[1]

Adhesive Application Onto Substrate Type[2]:	VOC Limit g/l (lb/gal)
Flexible Vinyl	250 (2.1)
Fiberglass	200 (1.7)
Metal to Metal	30 (0.3)
Porous Material	120 (1.0)
Other Substrates Not Listed	250 (2.1)

1. Units in grams of VOC per liter of material (pounds per gallon).
2. If an adhesive is used to bond dissimilar substrates together, the adhesive with the highest VOC content limit shall be allowed.
Conversion factor: 1 pound VOC per gallon = 119.95 grams VOC per liter.

Rule Requirement -Process and Control Requirements

Section 301 of the rule reads:

> *"Spray application of adhesives shall only be performed using airless, air assisted airless, high volume low pressure, disposable aerosol containers, or electrostatic spray equipment."*

Subsuming Permit Condition

The permit holder shall use one or more of the following methods when applying adhesives: hand application, dip coat, flow coat, brush/roll coat, HVLP spray, LVLP spray, or aerosol cans. In addition, contact bond adhesives that are sprayed may be applied using any of the following methods: airless spray, air-assisted airless spray, or air-atomized spray. [District Rule 2.33, §302/C-04-165]

Rule Requirement -Storage and Disposal Requirements

Section 30 of the rule reads:

"303.1 Closed containers shall be used to store adhesive products, cleaning materials, or other VOC-containing materials except when accessed for use.

303.2 Self-closing containers shall be used for the disposal of all adhesive products, cleaning materials, or other unused VOC-containing materials in such a manner as to effectively control VOC emissions."

Subsuming Permit Condition

All VOC-containing materials, whether in its form for intended use or as a waste or used product, including items such as cloth or paper laden with VOC containing materials, shall be stored in non-absorbent, non-leaking containers which shall be kept closed at all times, except when filling or emptying, and disposed of in a manner to prevent evaporation of VOCs into the atmosphere at the facility. [District Rule 2.33, §304 and 3.1, §402]

Rule Requirement -Storage and Disposal Requirements

Section 501 of the rule reads:

"501.1 Any person subject to the provisions of this Rule shall maintain the following records:

a. Daily records of the type and quantity of all adhesives, primers, and cleaning materials used in each operation.

b. Records of the VOC content, in grams VOC per liter less water and exempt compounds, of all adhesive materials used or stored at the facility.

c. Records of the VOC content of all cleaning materials used and stored at the facility.

d. Records of daily hours of operation and key operating parameters of any add-on control equipment.

501.2 All records required by Section 501.1 of this Rule shall be retained at the facility for a period of at least 24 months

and be made available to the Air Pollution Control Officer upon request."

Subsuming Permit Condition

The permit holder shall maintain current records listing each adhesive, sealant, primer, stripper, and solvent used at the facility. The records shall include the category type, material name, mix ratio, application method, substrate type, VOC content, and composite partial pressure. [District Rule 2.33, §500 and 3.1, §402]

RULE 3.1 General Permit Requirements

Rule Description

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

Compliance Status

The source has satisfied the provisions of General Permit Requirements. The rule applies to all emission units at the stationary source. The version of the rule used in this evaluation was adopted on February 23, 1994 and is part of the current SIP. The General Permit Requirements are shown below.

Permit Conditions

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

No person shall operate any facility, article, machine, equipment, or other contrivance, for which an authorization to construct is required by District

Rules and Regulations without first obtaining a written permit from the Air Pollution Control Officer. [District Rule 3.1 § 302.1]

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

To assure compliance with all applicable regulations, the Air Pollution Control Officer may impose written conditions on any authorization to construct or permit to operate. The Air Pollution Control Officer may, after 30-day notice to the permittee, add or amend written conditions on any permit upon annual renewal to ensure compliance with and enforceability of any applicable rule or regulation. Additional provisions, as required by Title V of the Federal Clean Air Act, for the reopening of permits are specified in Rule 3.8, FEDERAL OPERATING PERMITS. Commencing work or operation under such a revised permits shall be deemed acceptance of all of the conditions so specified. [District Rule 3.1, §402]

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

Specific Permit Conditions

P-104-91(a2) (lamination)
The Permit Holder shall maintain purchase records for the gel coat and lamination booth exhaust filters. These records shall be retained for a period

of at least five years and shall be made available to District personnel upon request. [District Rule 3.1, §402/C-05-33]

P-108-91(a3) (painting - R&R booth) and P-23-93(a2) **(painting - main booth)**
The District must be notified prior to any source test and a protocol must be submitted for approval at least 14 days prior to testing. The results of the source test shall be submitted to the District within 60 days of the test date. The protocol and report shall be mailed to the attention of the Supervising Air Quality Engineer. [District Rule 3.1, §402/C-09-143 and C-09-144]

The paint booths shall be equipped with magnahelic gauges. These gauges shall be read at least once per operating day, while the booth is operating, and shall be recorded in a log. [District Rule 3.1, §402/C-09-143 and C-09-144]

The Permit Holder shall maintain daily records of critical faults and shutdowns of the RCCO. These records shall contain the date, the time of the critical fault or shutdown, the duration, and the reason for the fault or shutdown. [District Rule 3.1, §402/C-09-143 and C-09-144]

The Permit Holder shall maintain daily records showing the type, name, and amount of solvent used for cleanup and surface preparation. [District Rule 3.1, §402/C-09-143 and C-09-144]

All required records shall be retained for a minimum of five years and shall be made available for District inspection upon request. [District Rule 3.1, §402/C-09-143 and C-09-144]

P-109-91(a1) (ledge processes)
The Permit Holder shall maintain quarterly records of hours of operation for the permitted equipment. The log shall be retained for a period of at least five years and shall be made available District personnel upon request. [District Rule 3.1, §402/C-03-93]

P-111-91(a1) (adhesives use)
The Permit Holder shall maintain daily usage records for adhesives and adhesive related materials and corresponding daily VOC emissions. These records shall be retained for a period of at least five years and shall be made

available to District personnel upon request. [District Rule 3.1, §402/C-04-165]

P-34-04 (space heating), P-35-04 (space heating), and P-36-04 (space heating)
The Permit Holder shall maintain quarterly records of natural gas usage. The records shall be retained for a period of at least five years and shall be made available to District personnel upon request. [District Rule 3.1, §402/C-03-139, C-03-140 and C-03141]

RULE 3.4 New Source Review

Rule Description

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

Compliance Status

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

Permit Conditions

P-104-91(a2) (lamination)
Only non-atomized spray equipment shall be used for all lamination and gel coat operations at the facility. [District Rule 3.4/C-05-33]

All gel coats shall be applied in booth with filters in place and fan operating. [District Rule 3.4/C-05-33]

All lamination operations shall be conducted in booth with filters in place and fan operating, where feasible. [District Rule 3.4/C-05-33]

The Permit Holder shall not discharge into the atmosphere, from the booth stacks, any air contaminant, for a period or periods aggregating to more than three (3) minutes in any one (1) hour which is:[District Rule 3.4/C-05-33]

a. As dark or darker in shade than No. 1/4 on the Ringelmann Chart; or
b. Greater than 5% opacity.

The Permit Holder shall not utilize any gel coat material with a monomer content more than 35 percent by weight. [District Rule 3.4/C-05-33]]

The Permit Holder shall utilize lamination booth exhaust filters that are at least 94% efficient, as documented by the filter certification sheet. [District Rule 3.4/C-05-33]

P-108-91(a3) (painting - R&R booth) and P-23-93(a2) **(painting - main booth)** For the coating processes and related activities operating under C-09-143 and C-09-144, total coating related VOC emissions for both booths shall not exceed 112 lb/day, 6,885 lb/1st calendar quarter, 6,961 lb/2nd calendar quarter, 7,038 lb/3rd calendar quarter, 7,038 lb/4th calendar quarter, and 9.96 tons/year. [District Rule 3.4/C-09-143 and C-09-144]

For the processes operating under C-09-143 and C-09-144, the maximum amount of natural gas fuel consumed for all burners shall not exceed 0.13 million cubic feet/day, 11.66 million cubic feet/1st calendar quarter, 11.79 million cubic feet/2nd calendar quarter, 11.92 million cubic feet/3rd calendar quarter, 11.92 million cubic feet/4th calendar quarter, 47.30 million cubic feet/year. [District Rule 3.4/C-09-143 and C-09-144]

A non-resettable, totalizing gaseous fuel flow meter shall be utilized to measure the quantity (in cubic feet) of natural gas combusted. [District Rule 3.4/C-09-143 and C-09-144]

For the coating processes and related activities operating under C-09-143 and C-09-144, when determining compliance with the daily, quarterly, and yearly permitted process VOC limit, the source shall use the following equation [District Rule 3.4/C-09-143 and C-09-144]:

$\sum((OB \times OBvoc) + (IB \times IBvoc \times (1-CE/100)) = VOC$ from coating processes (lbs)

where:

OB = amount of solvent (or other material) used outside booths (gallons)
OBvoc = VOC content of (OB) material used (lb/gallon)
CE = control efficiency of RCCO = 95%
IB = amount of paint (or other material) used inside booth (gallons)
IBvoc = VOC content of (IB) material used (lb/gallon)

The Permit Holder shall not discharge into the atmosphere, from the control equipment exhaust, any air contaminant, for a period or periods aggregating to more than 3 minutes in any one hour which is:

a. As dark or darker in shade than No. 1/4 on the Ringelmann Chart; or
b. Greater than 5% opacity. [District Rule 3.4/C-09-143 and C-09-144]

The Permit Holder shall store all VOC-containing materials used in the coating operation (including coatings, catalysts, thinners, reducers and solvents), in non-absorbent, non-leaking containers. The containers are to be kept closed at all times except when filling or emptying. [District Rule 3.4/C-09-143 and C-09-144]

The Permit Holder shall use closed containers for the disposal of cloth, paper, or other VOC laden materials (including solvent and spent solvent used for surface preparation, clean-up, and paint removal). [District Rule 3.4/C-09-143 and C-09-144]

The rotor concentrator desorption air shall be maintained at a minimum temperature of 300° F, or as determined by the initial source test. [District Rule 3.4/C-09-143 and C-09-144]

The catalytic oxidizer shall operate at a minimum temperature of 550° F, or as determined by the initial source test. [District Rule 3.4/C-09-143 and C-09-144]

The pressure differential of the paint booths shall be maintained at a minimum of 0.008 inches water column while the paint booth is in operation. [District Rule 3.4/C-09-143 and C-09-144]

All painting shall be conducted in the booth with the RCCO operating. The RCCO shall remain fully interlocked with the spray gun air supply to prevent painting without the RCCO operating. [District Rule 3.4/C-09-143 and C-09-144]

The RCCO shall destroy a minimum of 95% of VOC emissions from the paint booth. [District Rule 3.4/C-09-143 and C-09-144]

The Permit Holder shall utilize booth exhaust particulate filters that are at least 95% efficient, as documented by the filter certification sheet. [District Rule 3.4/C-09-143 and C-09-144]

The Permit Holder shall perform a source test at least once every consecutive 24 months to demonstrate compliance with VOC control efficiency requirements. [District Rule 3.4/C-09-143 and C-09-144]

P-109-91(a1) (ledge processes)
The Permit Holder shall not discharge into the atmosphere, from any control equipment, any air contaminant, for a period or periods aggregating to more than 3 minutes in any one hour, which is:

a. As dark or darker in shade than No. 1/4 on the Ringelmann Chart; or
b. Greater than 5% opacity. [District Rule 3.4/C-03-93]

All control equipment shall be operating while the equipment that it serves is in operation. [District Rule 3.4/C-03-93]

The Permit Holder shall not discharge into the atmosphere particulate matter in excess of 0.01 grains per cubic feet of exhaust from the slash booth. [District Rule 3.4/C-03-93]

The Permit Holder shall not discharge into the atmosphere particulate matter in excess of 0.004 grains per cubic feet of exhaust from the vacuum system serving the handheld equipment. [District Rule 3.4/C-03-93]

P-34-04 (space heating), P-35-04 (space heating), and P-36-04 (space heating)
The heater shall be fired on natural gas only. [District Rule 3.4/C-03-139, C-03-140 and C-03141]

The Permit Holder shall not discharge into the atmosphere particulate matter in excess of 0.01 grains per cubic feet of exhaust. [District Rule 3.4/C-03-139, C-03-140 and C-03141]

RULE 3.8 Federal Operating Permits (Revised 4/11/01)

Rule Description

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

Compliance Status

The Rule was originally adopted on January 26, 1994. The most recent revision dates April 11, 2001and is part of the current SIP. The source is currently in compliance with the requirements of the rule. The source has submitted a timely and complete Title V application and is currently operating under an application shield.

Permit Conditions

Right of Entry:

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

a. Inspection of the stationary source, including equipment, work practices, operations, and emissions-related activity;

b. Inspection and duplication of records required by the permit to operate; and
c. Source sampling or other monitoring activities. [Rule 3.8 § 302.10]

Compliance with Permit Conditions:

The permittee shall comply with all Title V permit conditions. [Rule 3.8 § 302.11a]

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

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

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

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

Within a reasonable time period, the permittee shall furnish any information requested by the APCO, in writing, for the purpose of determining:
a. Compliance with the permit; or
b. Whether or not cause exists for a permit or enforcement action. [Rule 3.8 § 302.11f]

Emergency Provisions:

Within two weeks of an emergency event, the owner or operator shall submit to the District a properly signed contemporaneous log or other relevant evidence demonstrating that:
a. An emergency occurred;
b. The Permit Holder can identify the cause(s) of the emergency;
c. The facility was being properly operated at the time of the emergency;

d. All steps were taken to minimize the emissions resulting from the emergency; and
e. Within two working days of the emergency event, the Permit Holder provided the District with a description of the emergency and any mitigating or corrective actions taken; and

In any enforcement proceeding, the Permit Holder has the burden of proof for establishing that an emergency occurred. [District Rule 3.8, §302.12]

Severability

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

Compliance Certification

Section 302.14(a) of Rule 3.8 requires "the responsible official shall submit a compliance certification to the U.S. EPA and the APCO every twelve (12) months unless required more frequently by an applicable requirement. All compliance reports and other documents required to be submitted to the District by the responsible official shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete."

Streamlining Demonstration

As shown below, the standard annual compliance certification reporting language of Rule 3.8 (Federal Operating Permits), will be streamlined under the provisions of Rule 3.4 to include specific reporting and submittal dates:

The responsible official shall submit a compliance certification to the U.S. EPA and the APCO every twelve (12) months unless required more frequently by an applicable requirement. The twelve (12) month period will begin on the date that the Title V permit was originally issued (November 25), and will be due within thirty (30) days after the end of the reporting period, unless otherwise approved in writing by the District. All compliance reports and other documents required to be submitted to the District by the

responsible official shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. [District Rule 3.4 and District Rule 3.8, §302.14(a)]

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

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

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

Permit Life:

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

Payment of Fees:

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

Permit Revision Exemption:

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

Application Requirements:

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

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

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

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

Permit Reopening for Cause:

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

a. The need to correct a material mistake or inaccurate statement;
b. The need to revise or revoke a permit to operate to assure compliance with applicable federal requirements;
c. The need to incorporate any new, revised, or additional applicable federal requirements, if the remaining authorized life of the permit is 3 years or greater, no later than 18 months after the promulgation of such requirement (where less than 3 years remain in the authorized life of the permit, the APCO shall incorporate the requirements into the permit to operate upon renewal); or
d. Additional requirements promulgated pursuant to Title IV as they become applicable to any acid rain unit governed by the permit. [Rule 3.8 § 413.1]

Monitoring, Testing and Analysis:

Enter any appropriate monitoring required by Rule 3.8 § 302.5.

Recordkeeping:

The permit holder shall record maintenance of all monitoring and support information required by any applicable federal requirement, including:
a. Date, place, and time of sampling;
b. Operating conditions at the time of sampling;
c. Date, place, and method of analysis; and
d. Results of the analysis. [District Rule 3.8, §302.6a]

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

Reporting Requirements:

Any deviation from permit requirements, including that attributable to upset conditions (as defined in the permit), shall be promptly reported to the APCO.

For the purpose of this condition prompt means as soon as reasonably possible, but no later than 10 days after detection.[Rule 3.8 § 302.7a]

Streamlining Demonstration

Section 302.7(b) of Rule 3.8 requires "A monitoring report shall be submitted at least every six (6) months and shall identify any deviation from permit requirements, including that previously reported to the APCO pursuant to Section 302.7(a) of Rule 3.8."

Streamlining Demonstration

As shown below, the standard annual compliance certification reporting language of Rule 3.8 (Federal Operating Permits), will be streamlined under the provisions of Rule 3.4 to include specific reporting and submittal dates:

A semi-annual monitoring report shall be submitted at least every six (6) consecutive months and shall identify any deviation from permit requirements, including that previously reported to the APCO pursuant to Section 302.7(a) of Rule 3.8. The six (6) month period will begin on the date that the Title V permit was originally issued (November 25), and will be due within thirty (30) days after the end of the reporting period, unless otherwise approved in writing by the District. [District Rule 3.4 and District 3.8, §302.7(b)]

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

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

RULE 3.13 Toxics New Source Review

Rule Description

The purpose of this Rule is to require installation of best available control technology for toxics (T-BACT) at any constructed or reconstructed major source of hazardous air pollutants.

Compliance Status

This source is exempt from the provisions of this rule pursuant to section 102 of the Rule. The source is not constructing or reconstructing a major source.

Permit Condition

No permit conditions are required.

40 CFR Part 63, Subpart MMMM - Surface Coating of Miscellaneous Metal Parts and Products

Rule Description

The purpose of this rule is to control hazardous air pollutant (HAP) emissions from the surface coating of miscellaneous metal parts and products.

Compliance Status

This subpart is applicable to the facility because it is applicable to all facilities that perform surface coating of miscellaneous metal parts and products, and are a major source of HAPs. The source is currently in compliance with the rule.

Permit Condition

The Permit Holder shall comply with the National Emissions Standard for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products. [40CFR63 Subpart MMMM]

40 CFR Part 63, Subpart PPPP - National Emission Standard for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products

Rule Description

The purpose of this rule is to control hazardous air pollutant (HAP) emissions from the surface coating of plastic parts and products.

Compliance Status

This subpart is applicable to the facility because it is applicable to all facilities that perform surface coating of plastic parts and products, and are a major source of HAPs. The source is currently in compliance with the rule.

Permit Condition

The Permit Holder shall comply with the National Emissions Standard for Hazardous Air Pollutants: Surface Coating of Plastic Parts and Products on or before April 19, 2007. [40CFR63 Subpart PPPP]

40 CFR Part 63, Subpart WWWW - National Emission Standard for Hazardous Air Pollutants (NESHAP): Reinforced Plastic Composites Production

Rule Description

The purpose of this rule is to control hazardous air pollutant (HAP) emissions from the production and ancillary processes used to manufacture products with thermoset resins and gel coats.

Compliance Status

This subpart is applicable to the facility because it is applicable to all facilities that perform reinforced plastic products production and are a major source of HAPs. The facility is currently in compliance.

Permit Condition

The Permit Holder shall comply with the National Emission Standard for Hazardous Air Pollutants: Reinforced Plastic Composites Production on or before April 21, 2006. [40CFR63, Subpart WWWW]

40 CFR Part 64 - Compliance Assurance Monitoring

Rule Description

This subpart provides guidelines for developing a compliance assurance monitoring plan. This plan is a way to ensure that facilities will monitor the appropriate parameters, relating to emissions and control equipment, to ensure that compliance is maintained on an ongoing basis.

Compliance Status

This subpart is applicable to facilities with an emissions unit that is subject to an emission limitation or standard for a pollutant where the unit uses an add-on control device to achieve compliance with the emission limitation, and the unit has a pre-control device potential to emit that is equal to or greater than the major source threshold for that pollutant. This subpart is applicable to one operation for one pollutant at this source.

The only pollutant at this facility that is greater than the major source threshold is VOC. The facility is proposing to install a rotor concentrator catalytic oxidizer (RCCO) to control the emissions that occur in the paint booths and mix room at the facility. There is a mix room where the paint is dispensed and mixed by computer, according to preset formulas. There are two paint booths where the actual painting occurs, the main paint booth and the repair and rework booth. All of the emissions from these areas would be ducted to the control system. The surface prep emissions that occur outside of the booths can not be controlled and are still counted as part of the total emissions for the permit units. The equation for calculating actual emissions takes this into account. The two District permits that cover this equipment have both emissions and throughput caps.

The unit is subject to the proposed 10.00 ton emission limitation by a New Source Review permit condition, the unit uses a control device to achieve compliance with this permit condition, and the unit has a pre-control device potential to emit above the major source threshold for VOC. Therefore, this subpart is applicable to the painting operation at this facility.

The facility has proposed to continuously monitor and record the rotor concentrator desorption air temperature, and the catalytic oxidizer combustion chamber temperature. The facility has also proposed biannual source testing using EPA method 25 to verify that the minimum 95% control efficiency is accomplished. The critical set point for the desorption temperature is 300 degrees F. The critical set point for the catalytic oxidizer is 550 degrees F. If a critical set point is reached by the system, a programmable controller shuts both the RCCO and painting system down. The RCCO is interlocked with the air flow to the paint guns so that if a critical fault (or any other cause) shuts the RCCO down, spraying may not be continued.

There are three design criteria conditions and four performance criteria conditions listed under section 64.3 of the subpart (monitoring and design criteria) that must be met by the CAM plan. The first design criteria is that the monitoring system must be designed to obtain data for one or more indicators of emissions control performance for the control device. As described above, the facility is proposing to continuously monitor multiple critical temperatures on the control unit to ensure that the unit continues to maintain the minimum control efficiency. The facility will also be required to do a VOC destruction efficiency test every two years to verify the minimum 95% control efficiency of the RCCO. The facility will also monitor the booths to ensure that they continue to meet the definition of permanent total enclosure. These items meet the requirement that the monitoring system obtain data for one or more indicators of emissions control performance.

The second design criteria is that the facility establish appropriate ranges or designated conditions for the selected indicators such that operation within the ranges provides a reasonable assurance of ongoing compliance with emission limitations for the anticipated range of operating conditions. The facility must show that the selected indicators show a reasonable assurance of compliance with the 95% control efficiency requirement. The most important set point to assure this is the catalytic oxidizer minimum temperature set point. The online mode computer set point for the oxidizer is 700 degrees F, but the minimum threshold is 550 degrees F, as set by permit condition. The facility has proposed a continuous temperature recorder for this point to show compliance with this temperature threshold and has proposed that the painting system be automatically shut down at

any time that the temperature drop below this point. The only exception to this is the option of a standby mode, where the system can be placed in standby with the oxidizer at 400 degrees, but the spray system is inoperable. This is so that the oxidizer may be maintained at a temperature so that it won't need to be re-heated while the system may not be in operation for a period of time during the work shift. The facility will be required to keep records from this continuous temperature recorder and records of shut downs. The next set point that the facility has proposed to monitor in the same fashion is the rotor concentrator desorption temperature. This temperature is important to ensure that the VOCs are being fully desorbed from the zeolite wheel. This ensures that the wheel has full capacity to adsorb VOCs on the next rotation around. The on-line mode temperature of the desorption unit is 360 degrees F, but the minimum temperature fault threshold is 300 degrees F. This point will also have a continuous temperature recorder and will be handled in the same way as the oxidizer, as described above. Part two also requires that the operator monitor indicators to detect a bypass of the control device, if such a bypass can occur. The applicant will monitor to be sure that the control device does, in fact, shut down when the specified temperatures reach the fault thresholds.

The third design criteria requires that the design of indicator ranges may be based on a single maximum or minimum value, expressed as a function of process variables, expressed as maintaining the applicable parameter in a particular operational status or designated condition, or established as interdependent between more than one indicator. This criteria is met because the proposed indicators values are based on a single minimum value.

The first performance criteria that must be met is that the specifications that provide for obtaining data that are representative fo the emissions or parameters being monitored. The system will be installed according to manufacturers specifications because the manufacturer is installing it. The temperature indicator locations are built in to the system before the system reaches the site and there is no way to change the temperature indicator locations. This criteria has been met.

The second performance criteria that must be met is that verification procedures must be conducted to confirm the operational status of the monitoring and should be done according to the manufacturers requirements

or recommendations for installation, calibration, and start up operation. This criteria will be met because the manufacturer verified the temperature monitoring devices prior to start up and the devices are verified during the source tests that are conducted every two years after. This criteria will be met.

The third performance criteria that must be met is that quality assurance and control practices must be in place that are adequate to ensure the continuing validity of the data. The facility developed quality assurance and control practices prior to receiving the latest of the Permit to Operate. The criteria was met.

The fourth performance criteria that must be met is that specifications for the frequency of conducting the monitoring and data collecting procedures must be in place. The frequency for temperature logging is continuous, and the data collection is by automatic strip chart print out. For tracking faults and shut downs, the facility will manually record the date, time, and reason for the fault or shut down in a log. This criteria has been met.

Permit Condition

All conditions that satisfy the CAM requirements discussed in the section above have been required under either District Rule 3.1 or District Rule 3.4, New Source Review. These conditions specifically satisfy the CAM requirements and are shown below:

The District must be notified prior to any source test and a protocol must be submitted for approval at least 14 days prior to testing. The results of the source test shall be submitted to the District within 60 days of the test date. The protocol and report shall be mailed to the attention of the Supervising Air Quality Engineer. [District Rule 3.1, §402/C-09-143 &C-09-144]

The paint booths shall be equipped with magnahelic gauges. These gauges shall be read at least once per operating day and shall be recorded in a log. [District Rule 3.1, §402/C-09-143 &C-09-144]

The Permit Holder shall maintain daily records of critical faults and shutdowns of the RCCO. These records shall contain the date, the time of

the critical fault or shutdown, the duration, and the reason for the fault or shutdown. [District Rule 3.1, §402/C-09-143 &C-09-144]

The rotor concentrator desorption air shall be maintained at a minimum temperature of 300° F. [District Rule 3.4/C-09-143 and C-09-144]

The catalytic oxidizer shall operate at a minimum temperature of 550° F. [District Rule 3.4/C-09-143 and C-09-144]

The pressure differential in the paint booths shall be maintained at a minimum of 0.008 inches water column while the paint booth is in operation. [District Rule 3.4/C-09-143 and C-09-144]

All painting shall be conducted in the booth with the RCCO operating. The RCCO shall remain fully interlocked with the spray gun air supply to prevent painting without the RCCO operating. [District Rule 3.4/C-09-143 and C-09-144]

The RCCO shall destroy a minimum of 95% of VOC emissions from the paint booth, as determined by required source testing. [District Rule 3.4/C-09-143 and C-09-144]

The Permit Holder shall utilize booth exhaust particulate filters that are at least 95% efficient, as documented by the filter certification sheet. [District Rule 3.4/C-09-143 and C-09-144]

The Permit Holder shall perform a source test at least once every 24 consecutive months to demonstrate compliance with VOC control efficiency requirements. [District Rule 3.4/C-09-143 and C-09-144]

Ongoing source testing shall be conducted using the following test methods [District Rule 3.4/C-09-143 and C-09-144]:

a. Flow Rate - EPA Methods 1 & 2;
b. Stack gas oxygen - EPA Method 3A, or CARB Method 100;
c. VOC - EPA Method 25 (inlet prior to adsorber and outlet at stack)

The Permit Holder shall continuously monitor and record both the temperature of the desorption air stream and the temperature of the catalytic oxidizer. [District Rule 3.4/C-09-143 and C-09-144]

The paint booths must be maintained as Permanent Total Enclosures (PTE), as specified in EPA method 204. The natural draft opening sizes and locations shall be verified and documented during the start up period and shall be verified at least once every 12 calendar months. [District Rule 3.4/C-09-143 and C-09-144]