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Large Coating, Printing, Aerospace and Chemical Operations Team	PROCESSED BY	SMP
APPLICATION PROCESSING AND CALCULATIONS	REVIEWED BY	
	DATE	6/21/08

**PERMIT TO OPERATE EVALUATION
SPRAY BOOTHS**

Applicant's Name	G. B. MFG. INC./CALIFORNIA ACRYLIC/CAL SPAS
Company I.D.	2044
Mailing Address	1462-1481 E. NINTH STREET, POMONA, CA 91766
Equipment Address	SAME AS ABOVE

EQUIPMENT DESCRIPTION

APPLICATION NO. 482055 (New Construction, Replacement for P/O F83475, A/N 428765)

AIR POLLUTION CONTROL SYSTEM CONSISTING OF:

1. SPRAY SECTION 1, STUCCO, CUSTOM BUILT, 10' -0" W. X 15' - 9" L. X 8' - 7" H. (INSIDE DIMENSIONS).
2. SPRAY SECTION 3, STUCCO, CUSTOM BUILT, 10' -0" W. X 13' - 0" L. X 12' - 0" H. (INSIDE DIMENSIONS).
3. PLENUM WITH TWENTY-EIGHT 25" X 20" EXHAUST FILTERS AND A 2 H. P. EXHAUST FAN FOR SPRAY SECTIONS 1 AND 3.

APPLICATION NO. 483928 (New Construction, Replacement for P/O F83475, A/N 428765)

AIR POLLUTION CONTROL SYSTEM CONSISTING OF:

1. SPRAY SECTION 2, STUCCO, CUSTOM BUILT, 10' -0" W. X 15' - 9" L. X 8' - 7" H. (INSIDE DIMENSIONS),
2. PLENUM WITH TWELVE 25" X 20" EXHAUST FILTERS AND A 2 H. P. EXHAUST FAN FOR SPRAY SECTION 2.

APPLICATION NO. 483929 (Administrative change, Previous P/N F83471, A/N 428761)

BILLIARDS SPRAY BOOTH, FLOOR TYPE, 16'-4" W. X 33'-9" D. X 8'-2" H., WITH THIRTY 20" X 20" EXHAUST FILTERS, AND TWO 5 HP EXHAUST FANS.

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APPLICATION NO. 483930 (Administrative change, Previous P/N F83472, A/N 428762)

ENAMEL SPRAY BOOTH #1, FLOOR TYPE, SPRAY SYSTEMS INC., MODEL NO. 1-18810-C, 13'-8" W. X 19'-4" D. X 7'-10" H., WITH THIRTY-TWO 20" X 25" EXHAUST FILTERS, AND ONE 3 HP EXHAUST FAN.

APPLICATION NO. 483931 (Administrative change, Previous P/N F83474, A/N 428763)

ENAMEL SPRAY BOOTH #2, FLOOR TYPE, SPRAY SYSTEMS INC., MODEL NO. 1-18810-C, 13'-8" W. X 19'-4" D. X 7'-10" H., WITH THIRTY-TWO 20" X 25" EXHAUST FILTERS, AND ONE 3 HP EXHAUST FAN.

APPLICATION NO. 483932 (Administrative change, Previous P/N F83476, A/N 428760)

MIXER, POLYESTER-CALCIUM CARBONATE BLENDING, 3'-9" DIA., X 2'-11" H., 2550 POUNDS BATCH CAPACITY.

APPLICATION NO. 482924

TITLVE V REVISION

HISTORY

The above applications from GB Mfg. Inc. (dba Cal Spas) were submitted to the District to operate two new spray booths and to change the permit conditions administratively on previously permitted two enamel spray booths, one billiards spray booth and one polyester resin mixer.

Cal Spas is mainly a polyester spa manufacturer. It also manufactures billiards equipment and stucco barbecues. Once the barbecues have been assembled, they are brought to stucco spray booths. They are coated with a Multi-Tex Stucco coating manufactured by Multicoat Corp. Cal Spas has a number of active permits for spray booths, and a resin mixer under I.D. # 2044.

The applicant has replaced stucco spray booth (P/N F83475) recently with two stucco booths, as described above. One spray booth has two spray enclosures (sections 1 and 3) on either sides of a plenum with filters. The other spray booth has only one spray enclosure (section 2). Originally the applicant submitted only one application for all the three sections, but the District requested second application for a spray booth, as there are two stacks and two separate independent exhaust fans.

The stucco booth (P/N F83475) was in a VOC emission group limit with a mixer, a billiards spray booth and two enamel spray booths. They were limited to a combined VOC emission limit of 690 pounds in any one calendar month. The applicant did not request any VOC emission increase under this project. Thus, they were requested to submit administrative permit condition change applications to include the new two spray booths in the VOC group limit.

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A facility-wide VOC emission limit has not been established for this company. A group of equipment has a VOC emission limit as described above. The installation of two new spray booths is considered a functionally identical replacement to an old spray booth with no increase in the potential to emit. The applicant has also requested to operate the new spray booths within the VOC emission limit of the old stucco spray booth, not to exceed 12 lbs/day. Thus, no offsets are required for this project. Also with <12 lbs/day VOC limit between the two new spray booths, they comply with the BACT requirements.

The district database shows one notices to comply issued to this company to provide records in the last two years. One notice of violation was also issued in the last two years to this facility for not keeping adequate usage records to demonstrate compliance with permit conditions. The facility now operates “in compliance” upon follow-up inspections. Also, the database shows one complaint against this facility for nuisance odors in the last two years. However, the company was operating “in-compliance” during the complaint inspection.

This facility is located in an industrial area, and there are no schools located within 1000 feet of the facility. Also, this project will not result in any emission increases of criteria pollutants over 1 lb/day. Thus, Rule 212 public notice is not required for this project.

G. B. Mfg. Inc. (dba Cal Spas) is a Title V facility. An initial Title V permit was issued to this facility on 7/28/2003. This is the second permit revision of the initial Title V permit under this project. The proposed permit revision is considered a “minor permit revision” to the initial Title V permit, as described in the Regulation XXX evaluation.

PROCESS DESCRIPTION

GB Manufacturing/Cal Spas manufactures home resort products such as spas, gazebos, saunas, billiard tables, bars, outdoor barbecues. The resin mixer is used to mix polyester resin and calcium carbonate used for hand lay-up at the facility. The billiards booth is used to apply stains, sealers and topcoats on wood products in the Billiards department. The two enamel booths are used to apply water based enamel coatings (topcoats only) to the wooden sections of their spa products.

The stucco booths are used to apply stucco to Hardiboard used for outdoor barbecues. (Hardiboard is fiber reinforced cement board/sheet.) The stucco booth is also subject to Rule 442 since there is no source specific rule for this substrate. The coating used for this purpose contains less than 100 grams/lter VOC content. It also contains 0.1% ammonia.

OPERATING HOURS

Average, Maximum: 24 hr/day, 7 day/week, 52 weeks/year

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Maximum stucco spraying is 20 gal/day and maximum ammonia content is 0.015 lbs/gal.

i.e. $20 \times 0.015 = 0.3$ lbs/day NH_3 emissions = 0.013 lbs/hr emissions.

0.3 lbs/day $\times 365$ days/year = 109.5 lbs/year NH_3 emissions.

Ammonia emissions are expected to be well below the Tier 1 screening levels of 1.6 lbs/hr and 6,610 lbs/year for a 25 meter receptor. Spray booths are expected to comply with the Rule 1401 requirements.

Application Nos. 483929, 483930, 483931 and 483932

Emissions from this equipment are ROG and PM. These being administrative permit condition change applications, previous emission data will be assigned to these applications. The following table summarizes the emissions for all the applications.

Application No.	Previous Application No.	NSR Lb/day			
		VOC		PM10	
		Max	30-day average	Max	30-day average
483929	428761	17.04	17	4.8	5
483930	428762	23.04	0	0	0
483931	428763	23.04	0	0	0
483932	428760	17.04	0	0	0

RULES/REGULATION EVALUATION

▣ **RULE 212, PUBLIC NOTIFICATION**

▼ **SECTION 212(c)(1):**

This section requires a public notice for all new or modified permit units that may emit air contaminants located within 1,000 feet from the outer boundary of a school. These sources are not located within 1,000 feet from the outer boundary of a school. Therefore, public notice will not be required by this section.

▼ **SECTION 212(c)(2):**

This section requires a public notice for all new or modified facilities which have on-site emission increases exceeding any of the daily maximums as specified in subdivision (g). As shown in the following table, the emission increases are below the daily maximum limits specified by Rule 212(g), since the group cap will remain the same. Therefore, these applications will not be subject to this section.

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LB/DAY	CO	NOX	PM ₁₀	ROG	SOX	Pb
MAX. LIMIT	220	40	30	30	0	3
INCREASES	0	0	0	0	0	0

▼ **SECTION 212(c)(3):**

Please, see Rule 1401 evaluation section. These applications will not be subject to this section.

▼ **SECTION 212(g):**

This section requires a public notice for all new or modified sources which have on-site emission increases exceeding any of the daily maximums as specified in subdivision. As shown in the following table, the emission increases for the new spray booths are not above the daily maximum limits specified by Rule 212(g). The other applications are for administrative change only. Therefore, these applications will not be subject to this section.

LB/DAY	CO	NOX	PM ₁₀	ROG	SOX	Pb
MAX. LIMIT	220	40	30	30	60	3
INCREASES	0	0	0	6	0	0

▣ **RULES 401 & 402, VISIBLE EMISSIONS & NUISANCE**

No visible emissions are expected with proper operation of the equipment.

▣ **RULE 442, USAGE OF SOLVENTS**

Stucco mix is applied on Hardiboard, a fiber reinforced cement. This booth is subject to Rule 442. The applicant has requested to take a VOC emission cap of 12 lb/day on these booths to be exempt under Rule 1132(h)(2). A facility-wide VOC emission limit of 833 pounds per calendar month subject to Rule 442 is also imposed on the facility to comply with Rule 442 requirements.

▣ **RULE 1171, SOLVENT CLEANING OPERATIONS**

This rule applies to the use, storage and disposal of VOC containing materials employed in solvent cleaning operations. The facility will use water or acetone to clean its finishing equipment depending upon the coating used. Compliance is expected.

REGULATION XIII

▣ **RULE 1303(a), BEST AVAILABLE CONTROL TECHNOLOGY (BACT)**

Applications 483928 to 483932 are administrative change applications, with no change in the process and the emissions. Hence they are exempt from BACT requirements.

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The maximum VOC emissions from the new spray booths will be well below 1170 lbs/month. Thus, add-on control equipment for VOC is not required. The use of low VOC (0.28 lb/gal) containing materials provides compliance with the BACT requirements. The spray booth filters are considered BACT for PM10.

▣ **RULE 1303(b)(1), MODELING**

PM10 emission increases are below 0.41 lb/hr (Table A-1 for non-combustion sources) for the new spray booths. Thus, they comply with these requirements.

▣ **RULE 1303 (b)(2), EMISSION OFFSETS**

No increase in VOC emissions from this facility is expected from this project. The new spray booths will continue to operate under the existing group VOC emission cap of 690 lbs/month. Thus, offsets are not required for VOC. There is no PM10 emission increase from the group of spray booths.

▣ **RULE 1401, NEW SOURCE REVIEW OF CARCINOGENIC AIR CONTAMINANTS**

As indicated above the new spray booths will comply with these requirements.

REGULATION XXX

The proposed project is considered as a “minor permit revision” to the current Title V permit for this facility since there is not an emission increase of pollutants subject to Reg. XIII or hazardous air pollutants. Rule 3000(b)(12) defines a “minor permit revision” as any Title V permit revision that does not result in any of the following:

- Emission increase of RECLAIM pollutants over the facility starting Allocation plus non-tradeable Allocations, or a higher Allocation amount which has previously undergone a significant permit revision process,
- Emission increase in hazardous air pollutants (HAPs) or pollutants subject to Reg. XIII, or
- Installation of a new permit unit or the modification or reconstruction of an existing permit unit subject to a New Source Performance Standard (NSPS) per 40 CFR Part 60 or a National Emission Standard for HAPs per 40 CFR Part 61 or Part 63.

Rule 3003(j) specifies that all proposed Title V permit revisions shall be submitted to EPA for review. This is the second permit revision requested by the facility. The cumulative emission increases resulting from this proposed permit revision are summarized as follows:

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Revisions	HA P	VOC	NOx	PM ₁₀	SOx	CO
1 st Revision Change permit conditions for compliance with Rule 1132(d)(1) - A/Ns 428740, 428758 and 428759..	0	0	0	0	0	0
1 st Revision Change of permit conditions for a/n 428760, modification and change of permit condition for a/n 428761 and p/o no p/c for a/ns 428762, 428763 and 428765 and rule 1132 for all of the above applications. Remove equipment on A/Ns 401552 and 408473	0	6	0	1	0	0
2 nd Revision. Installations of spray booths (A/N 482055 and 483928). And administrative change of spray booths (A/N 483929, 482930, 483931 and 483932	0	0	0	0	0	0
Total Emission Increase Since the Issuance of initial Title V Permit	0	6	0	1	0	0
Maximum Daily Threshold	30	30	40	30	60	220

CONCLUSIONS/RECOMMENDATIONS

The proposed project is expected to comply with all applicable District Rules and Regulations. Since the proposed project is considered as a “minor permit revision”, it is exempt from the public participation requirements under Rule 3006 (b). A proposed permit incorporating this permit revision will be submitted to EPA for a 45-day review pursuant to Rule 3003(j). If EPA does not have any objections within the review period, a revised Title V permit will be issued to this facility.