

YOLO-SOLANO AIR QUALITY MANAGEMENT DISTRICT
1947 Galileo Court, Suite 103, Davis, CA 956168
(530)757-3650

TITLE V PERMIT STATEMENT OF BASIS

PERMIT NUMBER: F-00555-5
ENGINEER: Kyle Rohlfing
DATE: November 15,
2010

Facility Name: California State Prison-Solano
Mailing Address: 2100 Peabody Road
Vacaville, CA 95696-4000

Location: 2100 Peabody Road
Vacaville, CA 95696-4000

Responsible Official: Donald Mims
Title: Correctional Plant Manager II

Application Contact: Hugh Carolan
Phone: (707) 451-0182 ext. 5822

I. FACILITY DESCRIPTION

The California State Prison at Solano (CSP) is a correctional detention center for convicted male felons. As part of the prison program, the Prison Industry Authority (PIA) provides vocational work programs for the inmates. Support operations include emergency power generation, graphic arts printing, abrasive blasting, metal parts and products coating, automotive coating, woodworking operations, and wood products coating.

The source has submitted an approved Yolo-Solano Air Quality Management District (District) application requesting the renewal of Title V operating permit F-00555 (issued October 19, 2010).

The source's Title V permit was last amended by the proposed revisions of Title V permit F-00555-4 (proposed October 21, 2010).

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
Stationary Internal Combustion (IC) Engine	Rule 3.2, Section 105.1
Metal Cutting Fluid	Rule 3.2, Section 113
Comfort Cooling Systems	Rule 3.2, Section 103
Misc. Maintenance Solvent Cleaning	Rule 3.2, Section 113
Welding Operations	Rule 3.2, Section 113
Book Printing Operation	Rule 3.2, Section 113

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-41-88(a1), Metal Parts Coating Operation (Liquid & Powder Coating)

Equipment Description: One (1) 16' x 16' x 30' liquid spray booth with HVLP guns; one (1) 10' x 10' x 34' powder spray booth with electrostatic guns; and one (1) 2.15 MMBtu/hr natural gas fired oven burner

Control Equipment: Two (2) 20 HP exhaust fans with dry filter system serving the liquid booth; and one (1) 60 HP exhaust fan with dry cartridge filter system serving the powder booth

Identification Number: P-42-88, Enclosed Steel Shot Blasting

Equipment Description: Pauli and Griffen Enclosed Blasting Booth, Model #1540, Serial #2657, Air Compressor, 50 hp

Control Equipment: EPA-Approved Blasting Steel Shot, Dry Filter System (5,400 cfm)

Identification Number: P-53-88(a), Coating Operation: Automotive

Equipment Description: 52' x 15' x 16' spray booth with HVLP gun(s), enclosed gun washer, and 0.4 MMBtu/hr permit exempt natural gas fired heater

Control Equipment: Exhaust fan (10,000 CFM) with dry filter system

Identification Number: P-3-90, Coating Operation: Wood Products

Equipment Description: 8'4" x 7'4" x 10'2" paint spray booth with spray guns; Enclosed gun washer

Control Equipment: Exhaust fan (7,285 cfm) with dry filter system

Identification Number: P-35-92, Woodworking Operation

Equipment Description: Various woodworking equipment (total electric horsepower rating not to exceed 90 HP)

Control Equipment: Baldor cyclone, Model #4104T, (18,000 cfm); Baghouse (8' x 18", 18 bags)

Identification Number: P-36-92, Woodworking Operation

Equipment Description: Jointer (3/4 hp), Table Saw (1 1/2 hp), Radial Arm Saw (5 hp), Belt Sander (1 hp)

Control Equipment: Torit cyclone, Model #36, (18,000 cfm); Baghouse (8' x 18", 12 bags)

Identification Number: P-77-92(a), Letterpress and Silkscreen Printing Operation

Equipment Description: One (1) Heidelberg letterpress; three (3) Brandtjen & Kluge, Inc. letter presses; four (4) American M&M Cameo screen printing presses; one (1) AWT UV Dryer; and one (1) American Screen Printing UV dryer

Control Equipment: None

Identification Number: P-27-95, Emergency Internal Combustion Engine; Generator #2

Equipment Description: 960 BHP diesel fired Detroit Diesel internal combustion engine, Model No. 16V-92T 8163-7305, Serial No. 16VF006390

Control Equipment: Turbocharger

Identification Number: **P-28-95, Emergency Internal Combustion Engine; Generator #4**

Equipment Description: 940 BHP diesel fired Mitsubishi internal combustion engine, Model No. S12A2PT

Control Equipment: Turbocharger and Aftercooler

Identification Number: **P-29-95, Emergency Internal Combustion Engine; Generator #1**

Equipment Description: 960 BHP diesel fired Detroit Diesel internal combustion engine, Model No. 16V-92T 8163-7305, Serial No. 16VF006382

Control Equipment: Turbocharger

Identification Number: **P-30-95, Emergency Internal Combustion Engine; Generator #3**

Equipment Description: 940 BHP diesel fired Mitsubishi internal combustion engine, Model No. S12A-PTA, Serial No. 11082

Control Equipment: Turbocharger and Aftercooler

Identification Number: **P-31-95, Emergency Internal Combustion Engine; Generator #5**

Equipment Description: 750 BHP diesel fired Mitsubishi internal combustion engine, Model No. S6N-PTA-2 DS00SF, Serial No. 22041

Control Equipment: Turbocharger and Aftercooler

Identification Number: **P-133-95, Coating Operation: Automotive, Metal Parts and Products**

Equipment Description: 14' x 10' x 27' paint spray booth with HVLP gun(s) and enclosed gun washer

Control Equipment: Exhaust fan with dry filter system (30,000 cfm)

Identification Number: **P-167-95, Coating Operation: Metal Parts and Products**

Equipment Description: 14' x 9' x 26' spray booth with spray gun(s), and enclosed gun washer

Control Equipment: Exhaust fan with dry filter system

Identification Number:	P-55-97, Dryers for an Institutional Laundry Facility
Equipment Description:	Three (3) 2.5 MMBtu/hr natural gas fired Challenge Dryers, Model No. CFG-1, Serial No.'s: 593-410, 593-411, and 593-412
Control Equipment:	None
Identification Number:	P-22-04(a), Coating Operation: Metal Parts and Products (Liquid & Powder Coating)
Equipment Description:	One (1) 10' X 16' X 10' liquid spray booth with HVLP guns; one (1) 10' X 10' X 10' powder spray booth with electrostatic guns; and two (2) 0.75 MMBtu/hr natural gas fired oven burners
Control Equipment:	One (1) 5 HP exhaust fan with dry filter system serving the liquid booth; and two (2) 3 HP exhaust fans with dry cartridge filter system serving the powder booth
Identification Number:	P-64-04, Emergency Internal Combustion (IC) Engine
Equipment Description:	415 BHP diesel fired Detroit Diesel IC engine, Model No.6063-MK35R, Serial No. 06R0719432.
Control Equipment:	Aftercooler and turbocharger
Identification Number:	P-51-10, Internal combustion (IC) engine powering an emergency generator
Equipment Description:	165 BHP diesel fired John Deere IC engine, Model No. 6068TF275F, Serial No. PE6068T673022, Model Year 2006, EPA Certified Tier II Engine
Control Equipment:	Turbocharger

IV. TITLE V APPLICABILITY

As regulated by the US Environmental Protection Agency (EPA); CSP, PIA, and the California Medical Facility (CMF) are considered all to be part of one Federal Major Source. Although the combined potential to emit for CSP and PIA alone do not exceed the Title V thresholds for any of the criteria pollutants, the facilities are subject to the requirements of District Rule 3.8 because the potential to emit for all three facilities combined exceed the major source thresholds for volatile organic compounds (VOC) and nitrogen oxides (NO_x) of 25 tons per year each.

Because of the facility's organizational structure CSP and PIA operate under Title V permit F-00555-0, while CMF has been issued a separate Title V permit (F-00072-5) effective August 16, 2010.

Table 2: The CSP and PIA combined facility emission totals:

Criteria Pollutant Emissions (tons per year)					
Permit	VOC	CO	NO _x	SO _x	PM ₁₀
P-41-88(a1)	2.14	0.70	0.83	Neg.	0.65
P-22-04(a)	1.24	0.55	0.66	Neg.	0.45
P-42-88	-	-	-	-	0.01
P-53-88(a)	2.17	-	-	-	0.28
P-3-90	0.52	-	-	-	-
P-35-92	-	-	-	-	0.25
P-36-92	-	-	-	-	0.28
P-77-92(a)	0.24	-	-	-	-
P-27-95	0.01	0.03	0.13	-	0.01
P-28-95	0.01	0.03	0.13	-	0.01
P-29-95	0.01	0.03	0.13	-	0.01
P-30-95	0.01	0.03	0.13	-	0.01
P-31-95	0.01	0.02	0.11	-	0.01
P-133-95	5.23	-	-	-	0.71
P-167-95	0.46	-	-	-	0.02
P-55-97	0.06	0.23	1.11	0.01	0.13
P-64-04	0.01	0.04	0.40	Neg.	0.01
P-51-10	0.04	0.03	0.14	-	0.01
Total	12.16	1.69	3.77	0.01	2.85

V. APPLICABLE FEDERAL REQUIREMENTS

RULE 2.3 Ringelmann Chart

Rule Description

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

Compliance Status

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

Rule Requirement #1

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 taking steps to include the revised rule in the California State Implementation Plan (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 either District Rule 3.1, General Permit Requirements, or District Rule 3.4, New Source Review.

The abrasive blasting process (P-42-88), the letterpress and silkscreen printing operation of P-77-92(a), the woodworking operations (P-35-92 & P-36-92) the emergency IC engines (P-27-95, P-28-95, P-29-95, P-30-95, P-31-95, & P-64-04), the natural gas fired laundry dryers (P-55-97), the metal parts and products coating operations (P-167-95, P22-04(a), & P-41-88(a1)), the wood products coating operation of (P-3-90), and the metal parts and automotive coating operation (P-133-95) 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.

The automotive coating operation of P-53-88(a) and the internal combustion (IC) engine powering an emergency generator of P-51-10 are subject to a 20% opacity limitation on visible emissions based on the authority of District Rule 3.4 which constitutes a federally enforceable requirement which is more stringent than the requirement of Rule 2.3. Therefore, the Rule 2.3 requirement can be subsumed by the Rule 3.4 requirement.

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 3.4]

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 version of the rule used in this evaluation is the rule adopted on October 1, 1971, and is part of the California SIP. The source is currently in compliance with the rule.

It should be noted that this permit condition is federally enforceable because it derives from District Rule 2.5 - Nuisance that is currently part of the California 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.

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.

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% PM₁₀ (PM with an aerodynamic diameter of 10 microns or less).

Compliance Status

The rule applies to the abrasive blasting process (P-42-88), the woodworking operations (P-35-92 & P-36-92) the emergency IC engines (P-27-95, P-28-95, P-29-95, P-30-95, P-31-95, P-64-04, & P-51-10), the natural gas fired laundry dryers (P-55-97), automotive coating operation of P-53-88(a), the metal parts and products coating operations (P-167-95, P22-04(a), & P-41-88(a1)), and the metal parts and automotive coating operation (P-133-95). The source is currently in compliance with this rule.

Rule Requirement #1

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: The District has revised District Rule 2.11 and is taking steps to include the revised rule in the California SIP. 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 District Rule 3.4 requirement in **P-42-88** is 0.1 lb/day of particulate matter. The maximum particulate matter in the exhaust is calculated below using the booth filter fan exhaust flow of 5,400 cubic feet per minute (cfm) and conservatively assuming:

$$= 0.1 \text{ lb/day} * \text{day}/24\text{hour} * 7,000 \text{ grains/lb} * \text{hour}/60\text{min} * \text{min}/5,400 \text{ dscf} = 0.002 \text{ grains/dscf}$$

The maximum rate of particulate matter emission calculated under the authority of District Rule 3.4 constitutes a federally enforceable requirement which is more stringent than the requirement of Rule 2.11. Therefore, the Rule 2.11 requirement can be subsumed by the Rule 3.4 requirement.

The **P-27-95** air flow can be calculated using the rated exhaust flow (6,850 ft³/min), the exhaust temperature (1,270°F + 460°F = 1,730°R), and the District standard temperature (68°F + 460°F = 528°R), and an a typical exhaust moisture content (10%):

$$= 6,850 \text{ ft}^3/\text{min} * 528^\circ\text{R} / 1,730^\circ\text{R} * (100\% - 10\%)$$

$$= 1,881.6 \text{ dscf/min}$$

The District Rule 3.4 requirement in P-27-95 is 1.5 lb/day of particulate matter. The maximum particulate matter in the exhaust is calculated below conservatively assuming:

$$= 1.5 \text{ lb/day} * \text{day/1 hour} * 7,000 \text{ grains/lb} * \text{hour/60min} * \text{min/1,881.6 dscf} = 0.09 \text{ grains/dscf}$$

The maximum rate of particulate matter emission calculated under the authority of District Rule 3.4 constitutes a federally enforceable requirement which is more stringent than the requirement of Rule 2.11. Therefore, for P-27-95 the Rule 2.11 requirement can be subsumed by the Rule 3.4 requirement.

The **P-28-95** air flow can be calculated using the rated exhaust flow (6,850 ft³/min), the exhaust temperature (1,660°F + 460°F = 2,120°R), and the District standard temperature (68°F + 460°F = 528°R), and an a typical exhaust moisture content (10%):

$$= 5,880 \text{ ft}^3/\text{min} * 528^\circ\text{R} / 2,120^\circ\text{R} * (100\% - 10\%) \\ = 1,318.0 \text{ dscf/min}$$

The District Rule 3.4 requirement in P-28-95 is 1.5 lb/day of particulate matter. The maximum particulate matter in the exhaust is calculated below conservatively assuming:

$$= 1.5 \text{ lb/day} * \text{day/1 hour} * 7,000 \text{ grains/lb} * \text{hour/60min} * \text{min/1,318.0 dscf} = 0.13 \text{ grains/dscf}$$

The maximum rate of particulate matter emission calculated under the authority of District Rule 3.4 constitutes a federally enforceable requirement which is more stringent than the requirement of Rule 2.11. Therefore, for P-28-95 the Rule 2.11 requirement can be subsumed by the Rule 3.4 requirement.

The **P-29-95** air flow can be calculated using the rated exhaust flow (6,850 ft³/min), the exhaust temperature (1,270°F + 460°F = 1,730°R), and the District standard temperature (68°F + 460°F = 528°R), and an a typical exhaust moisture content (10%):

$$= 6,850 \text{ ft}^3/\text{min} * 528^\circ\text{R} / 1,730^\circ\text{R} * (100\% - 10\%) \\ = 1,881.6 \text{ dscf/min}$$

The District Rule 3.4 requirement in P-29-95 is 1.5 lb/day of particulate matter. The maximum particulate matter in the exhaust is calculated below conservatively assuming:

$$= 1.5 \text{ lb/day} * \text{day/1 hour} * 7,000 \text{ grains/lb} * \text{hour/60min} * \text{min/1,881.6 dscf} = 0.09 \text{ grains/dscf}$$

The maximum rate of particulate matter emission calculated under the authority of District Rule 3.4 constitutes a federally enforceable requirement which is more stringent than the requirement of Rule 2.11. Therefore, for P-29-95 the Rule 2.11 requirement can be subsumed by the Rule 3.4 requirement.

The **P-30-95** air flow can be calculated using the rated exhaust flow (6,850 ft³/min), the exhaust temperature (1,660°F + 460°F = 2,120°R), and the District standard temperature (68°F + 460°F = 528°R), and an a typical exhaust moisture content (10%):

$$= 5,880 \text{ ft}^3/\text{min} * 528^\circ\text{R} / 2,120^\circ\text{R} * (100\% - 10\%) \\ = 1,318.0 \text{ dscf/min}$$

The District Rule 3.4 requirement in P-30-95 is 1.5 lb/day of particulate matter. The maximum particulate matter in the exhaust is calculated below conservatively assuming:

$$= 1.5 \text{ lb/day} * \text{day/1 hour} * 7,000 \text{ grains/lb} * \text{hour/60min} * \text{min/1,318.0 dscf} = 0.13 \text{ grains/dscf}$$

The maximum rate of particulate matter emission calculated under the authority of District Rule 3.4 constitutes a federally enforceable requirement which is more stringent than the requirement of Rule 2.11. Therefore, for P-30-95 the Rule 2.11 requirement can be subsumed by the Rule 3.4 requirement.

The **P-31-95** air flow can be calculated using the rated exhaust flow (4,630 ft³/min), the exhaust temperature (1,200°F + 460°F = 1,660°R), and the District standard temperature (68°F + 460°F = 528°R), and an a typical exhaust moisture content (10%):

$$= 4,630 \text{ ft}^3/\text{min} * 528^\circ\text{R} / 1,660^\circ\text{R} * (100\% - 10\%) \\ = 1,325.4 \text{ dscf/min}$$

The District Rule 3.4 requirement in P-31-95 is 1.3 lb/day of particulate matter. The maximum particulate matter in the exhaust is calculated below conservatively assuming:

$$= 1.3 \text{ lb/day} * \text{day/1 hour} * 7,000 \text{ grains/lb} * \text{hour/60min} * \text{min/1,325.4 dscf} = 0.11 \text{ grains/dscf}$$

The maximum rate of particulate matter emission calculated under the authority of District Rule 3.4 constitutes a federally enforceable requirement which is more stringent than the requirement of Rule 2.11. Therefore, for P-31-95 the Rule 2.11 requirement can be subsumed by the Rule 3.4 requirement.

The **P-64-04** air flow can be calculated using the rated exhaust flow (2,170 ft³/min), the exhaust temperature (785°F + 460°F = 1,245°R), and the District standard temperature (68°F + 460°F = 528°R), and an a typical exhaust moisture content (10%):

$$\begin{aligned} &= 2,170 \text{ ft}^3/\text{min} * 528^\circ\text{R} / 1,245^\circ\text{R} * (100\% - 10\%) \\ &= 828.3 \text{ dscf/min} \end{aligned}$$

The District Rule 3.4 requirement in P-64-04 is 1.5 lb/day of particulate matter. The maximum particulate matter in the exhaust is calculated below conservatively assuming:

$$= 1.5 \text{ lb/day} * \text{day}/24 \text{ hour} * 7,000 \text{ grains/lb} * \text{hour}/60\text{min} * \text{min}/828.3 \text{ dscf} = 0.009 \text{ grains/dscf}$$

The maximum rate of particulate matter emission calculated under the authority of District Rule 3.4 constitutes a federally enforceable requirement which is more stringent than the requirement of Rule 2.11. Therefore, for P-64-04 the Rule 2.11 requirement can be subsumed by the Rule 3.4 requirement.

The **P-51-10** air flow can be calculated using the rated exhaust flow (939 ft³/min), the exhaust temperature (1,040°F + 460°F = 1,500°R), and the District standard temperature (68°F + 460°F = 528°R), and an a typical exhaust moisture content (10%):

$$\begin{aligned} &= 939 \text{ ft}^3/\text{min} * 528^\circ\text{R} / 1,500^\circ\text{R} * (100\% - 10\%) \\ &= 297.5 \text{ dscf/min} \end{aligned}$$

The District Rule 3.4 requirement in P-51-10 is 1.9 lb/day of particulate matter. The maximum particulate matter in the exhaust is calculated below conservatively assuming:

$$= 1.9 \text{ lb/day} * \text{day}/24 \text{ hour} * 7,000 \text{ grains/lb} * \text{hour}/60\text{min} * \text{min}/297.5 \text{ dscf} = 0.03 \text{ grains/dscf}$$

The maximum rate of particulate matter emission calculated under the authority of District Rule 3.4 constitutes a federally enforceable requirement which is more stringent than the requirement of Rule 2.11. Therefore, for P-51-10 the Rule 2.11 requirement can be subsumed by the Rule 3.4 requirement.

The **P-55-97** air flow can be calculated using the natural gas F factor (8,710 dscf/MMBtu), natural gas heat content of 1,000 Btu/scf, and permit fuel limit of 0.0714 MMscf/day

$$\begin{aligned} &= 71.4 \text{ MMBtu/day} * 8,710 \text{ dscf/MMBtu} * 1 \text{ day}/10 \text{ hrs} * 1 \text{ hr}/60 \text{ min} \\ &= 1,036.5 \text{ dscf/min} \end{aligned}$$

The District Rule 3.4 requirement in P-55-97 is 0.9 lb/day of particulate matter. The maximum particulate matter in the exhaust is calculated below conservatively assuming:

$$= 0.9 \text{ lb/day} * \text{day}/10 \text{ hour} * 7,000 \text{ grains/lb} * \text{hour}/60\text{min} * \text{min}/1,036.5 \text{ dscf} = 0.01 \text{ grains/dscf}$$

The maximum rate of particulate matter emission calculated under the authority of District Rule 3.4 constitutes a federally enforceable requirement which is more stringent than the requirement of Rule 2.11. Therefore, for P-55-97 the Rule 2.11 requirement can be subsumed by the Rule 3.4 requirement.

For **P-53-88(a)**, the District Rule 3.4 particulate matter emission limit is 2.3 lb/day of particulate matter. The maximum particulate matter in the exhaust is calculated below using the booth filter fan exhaust flow of 10,000 cubic feet per minute (cfm) and conservatively assuming:

$$= 2.3 \text{ lb/day} * \text{day}/24\text{hour} * 7,000 \text{ grains/lb} * \text{hour}/60\text{min} * \text{min}/10,000 \text{ dscf} = 0.001 \text{ grains/dscf}$$

The maximum rate of particulate matter emission calculated under the authority of District Rule 3.4 constitutes a federally enforceable requirement which is more stringent than the requirement of Rule 2.11. Therefore, for P-53-88(a) the Rule 2.11 requirement can be subsumed by the Rule 3.4 requirement.

For **P-167-95**, the District Rule 3.4 particulate matter emission limit is 0.4 lb/day of particulate matter. The maximum particulate matter in the exhaust is calculated below using the booth filter fan exhaust flow of 15,500 cubic feet per minute (cfm) and conservatively assuming:

$$= 0.4 \text{ lb/day} * \text{day}/24\text{hour} * 7,000 \text{ grains/lb} * \text{hour}/60\text{min} * \text{min}/15,500 \text{ dscf} = 0.0001 \text{ grains/dscf}$$

The maximum rate of particulate matter emission calculated under the authority of District Rule 3.4 constitutes a federally enforceable requirement which is more stringent than the requirement of Rule 2.11. Therefore, for P-167-95 the Rule 2.11 requirement can be subsumed by the Rule 3.4 requirement.

For **P-22-04(a)**, the District Rule 3.4 particulate matter emission limit is 25.3 lb/day of particulate matter. The particulate matter emissions are the sum of 25.1 lb/day from the application of coatings and 0.3 lb/day from the combustion of natural gas.

The maximum particulate matter exhaust concentration from application of liquid coatings is calculated below using the liquid spray booth filter fan exhaust flow of 4,200 cfm and conservatively assuming:

$$= 25.1 \text{ gal/day} * 1\text{day}/24\text{hrs} * 1\text{hr}/60 \text{ min} * 7,000 \text{ grains/lb} * 1\text{min}/4,200 \text{ cfm} = 0.03 \text{ grains/dscf}$$

The maximum particulate matter exhaust concentration from application of powder coatings is calculated below using the powder coating booth filter fan exhaust flow of 5,040 cfm and conservatively assuming:

$$= 25.1 \text{ gal/day} * 1\text{day}/24\text{hrs} * 1\text{hr}/60 \text{ min} * 7,000 \text{ grains/lb} * 1\text{min}/5,040 \text{ cfm} = 0.02 \text{ grains/dscf}$$

The P-22-04(a) combustion air flow can be calculated using the natural gas F factor (8,710 dscf/MMBtu), natural gas heat content of 1,000 Btu/scf, and permit fuel limit of 0.0360 MMscf/day

$$= 36.0 \text{ MMBtu/day} * 8,710 \text{ dscf/MMBtu} * 1 \text{ day}/24 \text{ hrs} * 1 \text{ hr}/60 \text{ min} \\ = 217.8 \text{ dscf/min}$$

The maximum particulate matter in the combustion exhaust is calculated below conservatively assuming:

$$= 0.3 \text{ lb/day} * \text{day}/24 \text{ hour} * 7,000 \text{ grains/lb} * \text{hour}/60\text{min} * \text{min}/217.8 \text{ dscf} = 0.01 \text{ grains/dscf}$$

The maximum rate of particulate matter emission calculated under the authority of District Rule 3.4 constitutes a federally enforceable requirement which is more stringent than the requirement of Rule 2.11. Therefore, for P-22-04(a) the Rule 2.11 requirement can be subsumed by the Rule 3.4 requirement.

For **P-41-88(a1)**, the District Rule 3.4 particulate matter emission limit is 48.8 lb/day of particulate matter. The particulate matter emissions are the sum of 48.5 lb/day from the application of coatings and 0.4 lb/day from the combustion of natural gas.

The maximum particulate matter exhaust concentration from application of liquid coatings is calculated below using the booth filter fan exhaust flow of 4,200 cfm and conservatively assuming:

$$= 48.5 \text{ gal/day} * 1\text{day}/24\text{hrs} * 1\text{hr}/60 \text{ min} * 7,000 \text{ grains/lb} * 1\text{min}/36,000 \text{ cfm} \\ = 0.007 \text{ grains/dscf}$$

The maximum particulate matter exhaust concentration from application of powder coatings is calculated below using the powder coating booth filter fan exhaust flow of 4,200 cfm and conservatively assuming:

$$= 48.5 \text{ gal/day} * 1\text{day}/24\text{hrs} * 1\text{hr}/60 \text{ min} * 7,000 \text{ grains/lb} * 1\text{min}/35,000 \text{ cfm} \\ = 0.007 \text{ grains/dscf}$$

The P-41-88(a1) combustion air flow can be calculated using the natural gas F factor (8,710 dscf/MMBtu), natural gas heat content of 1,000 Btu/scf, and permit fuel limit of 0.0516 MMscf/day

$$\begin{aligned} &= 51.6 \text{ MMBtu/day} * 8,710 \text{ dscf/MMBtu} * 1 \text{ day/24 hrs} * 1 \text{ hr/60 min} \\ &= 312.1 \text{ dscf/min} \end{aligned}$$

The maximum particulate matter in the combustion exhaust is calculated below conservatively assuming:

$$= 0.4 \text{ lb/day} * \text{day/24 hour} * 7,000 \text{ grains/lb} * \text{hour/60min} * \text{min/312.1 dscf} = 0.01 \text{ grains/dscf}$$

The maximum rate of particulate matter emission calculated under the authority of District Rule 3.4 constitutes a federally enforceable requirement which is more stringent than the requirement of Rule 2.11. Therefore, for P-41-88(a1) the Rule 2.11 requirement can be subsumed by the Rule 3.4 requirement.

For **P-133-95**, the District Rule 3.4 particulate matter emission limit is 5.88 lb/day of particulate matter. The maximum particulate matter in the exhaust is calculated below using the booth filter fan exhaust flow of 30,000 cubic feet per minute (cfm) and conservatively assuming:

$$= 5.88 \text{ lb/day} * \text{day/24hour} * 7000 \text{ grains/lb} * \text{hour/60min} * \text{min/30,000 dscf} = 0.001 \text{ grains/dscf}$$

The maximum rate of particulate matter emission calculated under the authority of District Rule 3.4 constitutes a federally enforceable requirement which is more stringent than the requirement of Rule 2.11. Therefore, for P-133-95 the Rule 2.11 requirement can be subsumed by the Rule 3.4 requirement.

Subsuming Permit Condition

The permit holder shall not release or discharge into the atmosphere, from any source, particulate matter in excess of 0.1 grains per cubic foot of exhaust volume as calculated at standard conditions.

RULE 2.12 Specific Contaminants

Rule Description

_____ This rule specifies the allowable emission rates for sulfur compounds, calculated as sulfur dioxide (SO₂), and PM combustion contaminants at standard conditions (for purposes of this evaluation, particulate matter is consider to be PM₁₀ (particulate matter equal to 10 microns in diameter or less)).

Compliance Status

The rule applies to the seven emergency generators (P-27-95, P-28-95, P-29-95, P-30-95, P-31-95, P-64-04, & P-51-10), the laundry dryers of P-55-97 and the oven burners of P-22-04(a) and P-41-88(a1). The source is currently in compliance with the rule.

Rule Requirement #1

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 (SO₂) 0.2 percent, 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 (CO₂) at standard conditions, except during the start of an operation or change in energy source, during the time 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 (CO₂) produced by combustion of any liquid or gaseous fuels shall be excluded from the calculation to 12 percent of carbon dioxide (CO₂).”

Subsuming Demonstration: The District has revised District Rule 2.12 and is taking steps to include the revised rule in the California SIP. 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 subsuming demonstrations for PM emissions were shown above in the previous rule discussion and for SO₂ are shown below.

For P-27-95, the District Rule 3.4 emission limit is 0.3 lb/day of SO_x. The maximum SO₂ in the exhaust is calculated below using the calculated flow rate of 1,881.6 dscf/min (previous rule) as follows:

$$= 0.3 \text{ lb/day} * \text{day/1 hour} * 379 \text{ dscf SO}_2/\text{lb-mole} * 1 \text{ lb-mole}/64\text{lb SO}_2 * \text{hour}/60\text{min} * \text{min}/1,881.6 \text{ dscf} * 100 = 0.002\% \text{ SO}_x$$

The maximum exhaust SO₂ concentration calculated under the authority of District Rule 3.4 constitutes a federally enforceable requirement which is more stringent than the requirement of Rule 2.12. Therefore, for P-27-95 the Rule 2.12 requirement can be subsumed by the Rule 3.4 requirement.

For P-28-95, the District Rule 3.4 emission limit is 0.3 lb/day of SO_x. The maximum SO₂ in the exhaust is calculated below using the calculated flow rate of 1,318.0 dscf/min (previous rule) as follows:

$$= 0.3 \text{ lb/day} * \text{day/1 hour} * 379 \text{ dscf SO}_2/\text{lb-mole} * 1 \text{ lb-mole}/64\text{lb SO}_2 * \text{hour}/60\text{min} * \text{min}/1,318.0 \text{ dscf} * 100 = 0.00002\% \text{ SO}_x$$

The maximum exhaust SO₂ concentration calculated under the authority of District Rule 3.4 constitutes a federally enforceable requirement which is more stringent than the requirement of Rule 2.12. Therefore, for P-28-95 the Rule 2.12 requirement can be subsumed by the Rule 3.4 requirement.

For P-29-95, the District Rule 3.4 emission limit is 0.3 lb/day of SO_x. The maximum SO₂ in the exhaust is calculated below using the calculated flow rate of 1,881.6 dscf/min (previous rule) as follows:

$$= 0.3 \text{ lb/day} * \text{day/1 hour} * 379 \text{ dscf SO}_2/\text{lb-mole} * 1 \text{ lb-mole}/64\text{lb SO}_2 * \text{hour}/60\text{min} * \text{min}/1,881.6 \text{ dscf} * 100 = 0.00002\% \text{ SO}_x$$

The maximum exhaust SO₂ concentration calculated under the authority of District Rule 3.4 constitutes a federally enforceable requirement which is more stringent than the requirement of Rule 2.12. Therefore, for P-29-95 the Rule 2.12 requirement can be subsumed by the Rule 3.4 requirement.

For P-30-95, the District Rule 3.4 emission limit is 0.3 lb/day of SO_x. The maximum SO₂ in the exhaust is calculated below using the calculated flow rate of 1,318.0 dscf/min (previous rule) as follows:

$$= 0.3 \text{ lb/day} * \text{day/1 hour} * 379 \text{ dscf SO}_2/\text{lb-mole} * 1 \text{ lb-mole}/64\text{lb SO}_2 * \text{hour}/60\text{min} * \text{min}/1,318.0 \text{ dscf} * 100 = 0.00002\% \text{ SO}_x$$

The maximum exhaust SO₂ concentration calculated under the authority of District Rule 3.4 constitutes a federally enforceable requirement which is more stringent than the requirement of Rule 2.12. Therefore, for P-30-95 the Rule 2.12 requirement can be subsumed by the Rule 3.4 requirement.

For P-31-95, the District Rule 3.4 emission limit is 0.3 lb/day of SO_x. The maximum SO₂ in the exhaust is calculated below using the calculated flow rate of 1,325.4 dscf/min (previous rule) as follows:

$$= 0.3 \text{ lb/day} * \text{day/1 hour} * 379 \text{ dscf SO}_2/\text{lb-mole} * 1 \text{ lb-mole}/64\text{lb SO}_2 * \text{hour}/60\text{min} * \text{min}/1,325.4 \text{ dscf} * 100 = 0.002\% \text{ SO}_x$$

The maximum exhaust SO₂ concentration calculated under the authority of District Rule 3.4 constitutes a federally enforceable requirement which is more stringent than the requirement of Rule 2.12. Therefore, for P-31-95 the Rule 2.12 requirement can be subsumed by the Rule 3.4 requirement.

For P-64-04, the District Rule 3.4 emission limit is 0.1 lb/day of SO_x. The maximum SO₂ in the exhaust is calculated below using the calculated flow rate of 828.3 dscf/min (previous rule) as follows:

$$= 0.1 \text{ lb/day} * \text{day/24 hour} * 379 \text{ dscf SO}_2/\text{lb-mole} * 1 \text{ lb-mole/64lb SO}_2 * \text{hour/60min} * \text{min/828.3 dscf} * 100 = 0.00005\% \text{ SO}_x$$

The maximum exhaust SO₂ concentration calculated under the authority of District Rule 3.4 constitutes a federally enforceable requirement which is more stringent than the requirement of Rule 2.12. Therefore, for P-64-04 the Rule 2.12 requirement can be subsumed by the Rule 3.4 requirement.

For P-51-10, the District Rule 3.4 emission limit is 0.05 lb/day of SO_x. The maximum SO₂ in the exhaust is calculated below using the calculated flow rate of 297.5 dscf/min (previous rule) as follows:

$$= 0.05 \text{ lb/day} * \text{day/24 hour} * 379 \text{ dscf SO}_2/\text{lb-mole} * 1 \text{ lb-mole/64lb SO}_2 * \text{hour/60min} * \text{min/297.5 dscf} * 100 = 0.0001\% \text{ SO}_x$$

The maximum exhaust SO₂ concentration calculated under the authority of District Rule 3.4 constitutes a federally enforceable requirement which is more stringent than the requirement of Rule 2.12. Therefore, for P-51-10 the Rule 2.12 requirement can be subsumed by the Rule 3.4 requirement.

For P-55-97, the District Rule 3.4 emission limit is 0.04 lb/day of SO_x. The maximum SO₂ in the exhaust is calculated below using the calculated flow rate of 1,036.5 dscf/min (previous rule) as follows:

$$= 0.04 \text{ lb/day} * \text{day/24 hour} * 379 \text{ dscf SO}_2/\text{lb-mole} * 1 \text{ lb-mole/64lb SO}_2 * \text{hour/60min} * \text{min/1,036.5 dscf} * 100 = 0.00002\% \text{ SO}_x$$

The maximum exhaust SO₂ concentration calculated under the authority of District Rule 3.4 constitutes a federally enforceable requirement which is more stringent than the requirement of Rule 2.12. Therefore, for P-55-97 the Rule 2.12 requirement can be subsumed by the Rule 3.4 requirement.

For P-22-04(a), the District Rule 3.4 emission limit is 0.02 lb/day of SO_x. The maximum SO₂ in the exhaust is calculated below using the calculated flow rate of 217.8 dscf/min (previous rule) as follows:

$$= 0.02 \text{ lb/day} * \text{day/24 hour} * 379 \text{ dscf SO}_2/\text{lb-mole} * 1 \text{ lb-mole/64lb SO}_2 * \text{hour/60min} * \text{min/217.8 5 dscf} * 100 = 0.00004\% \text{ SO}_x$$

The maximum exhaust SO₂ concentration calculated under the authority of District Rule 3.4 constitutes a federally enforceable requirement which is more stringent than the requirement of Rule 2.12. Therefore, for P-22-04(a) the Rule 2.12 requirement can be subsumed by the Rule 3.4 requirement.

For P-41-88(a1), the District Rule 3.4 emission limit is 0.03 lb/day of SO_x. The maximum SO₂ in the exhaust is calculated below using the calculated flow rate of 312.1 dscf/min (previous rule) as follows:

$$= 0.03 \text{ lb/day} * \text{day/24 hour} * 379 \text{ dscf SO}_2/\text{lb-mole} * 1 \text{ lb-mole/64lb SO}_2 * \text{hour/60min} * \text{min/312.1 dscf} * 100 = 0.00004\% \text{ SO}_x$$

The maximum exhaust SO₂ concentration calculated under the authority of District Rule 3.4 constitutes a federally enforceable requirement which is more stringent than the requirement of Rule 2.12. Therefore, for P-44-88(a1) the Rule 2.12 requirement can be subsumed by the Rule 3.4 requirement.

RULE 2.16 Fuel Burning Heat or Power Generators

Rule Description

_____ This rule specifies the allowable sulfur dioxide (SO₂), nitrogen oxides calculated as nitrogen dioxide (NO₂), and combustion particulate limits for non-mobile, fuel burning, heat or power generating units in the District.

Compliance Status

_____ The rule applies to the seven emergency generators (P-27-95, P-28-95, P-29-95, P-30-95, P-31-95, P-64-04, & P-51-10), the laundry dryers of P-55-97 and the oven burners of P-22-04(a) and P-41-88(a1). The source is currently in compliance with the rule.

Rule Requirement #1

Rule 2.16 reads:

“A person shall not build, expand, or operate any non-mobile fuel burning equipment for a heat or power generator unit unless the discharge into the atmosphere of contaminants will not and does not exceed any one or more of the following rates:

1. 200 pounds per hour of sulfur compounds, calculated as sulfur dioxide (SO₂);
2. 140 pounds per hour of nitrogen oxides, calculated as nitrogen dioxide (NO₂);
3. 40 pounds per hour of combustion particulate derived from the fuel.”

Compliance Demonstration

The daily emission limits for sulfur compounds, nitrogen oxides and particulate matter for the units referenced above are less than the respective hourly limits of the rule except for P-41-88(a1) and in that case only because the daily limits include particulate emissions from combustion and non-combustion activities. Permit conditions are not 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 version of the rule used in this evaluation is the rule adopted on October 1, 1971, and is part of the California SIP. The source is currently in compliance with the rule.

Rule Requirement #1

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 2.19 Particulate Matter Process Emission Rate

Rule Description

_____ The purpose of this rule is to limit the emissions of particulate matter from emission sources based on the weight of material processed.

Compliance Status

The rule is applicable to the abrasive blasting operation of P-42-88. The version of the rule used in this evaluation is the rule adopted on October 1, 1971, and is part of the California SIP. The source is currently in compliance with the rule.

Rule Requirement #1

Rule 2.19 reads:

- "a. No person shall discharge in any one hour from any process unit except for motor vehicles, implements of husbandry, and certain agricultural facilities as given in b. and c. particulate matter of a weight in excess of the amount shown for the corresponding process weight per hour in the following table. Use the process weight per hour as defined in Rule 1.2.y. to find the corresponding allowable process emission rate.
- b. Where the requirements of the Federal Primary Air Quality Standards for Particulate Matter are met in the vicinity of any new facility and associated operations which are necessary to sustain agricultural operations, the process weight emission requirements for particulate matter shall apply only to those

emissions of aerodynamic size diameter of 10 microns or less provided that any emissions do not constitute a nuisance and provided that:

1. No more than 10 family residences are within a 1/4 mile radius of the facility;
 2. No zoned boundaries for other than agricultural and heavy industry are within one (1) mile of the facility;
 3. No city limit is within two (2) miles of the facility.
- c. Where the requirements of the Federal Primary Air Quality Standards for Particulate Matter are met in the vicinity of any existing facility and associated operations which are necessary to sustain agricultural operations, the process weight emission requirements shall apply only to those emissions of aerodynamic size diameter of 10 microns or less provided that any emissions do not constitute a nuisance.

TABLE 3
 PROCESS WEIGHT VS ALLOWABLE EMISSION RATE PER HOUR

Process Weight Lbs/Hr Emission Rate More Than	To and Including	Allowable Lbs/Hr
0	400	1
400	800	2
800	1500	3
1500	2200	4
2200	2900	5
2900	4100	6
4100	5400	7
5400	7000	8
7000	8500	9
8500	10000	10
10000	11600	11
11600	13200	12
13200	14800	13
14800	16400	14
16400	18000	15
18000	19600	16
19600	21300	17
21300	23000	18
23000	24700	19
24700	26500	20
26500	28300	21
28300	30000	22

30000	31700	23
31700	33300	24
33300	35000	25
35000	36700	26
36700	38300	27
38300	40000	28
40000	41700	29
41700	43300	30
43300	45000	31
45000	46700	32
46700	48300	33
48300	50000	34
50000	51700	35
51700	53300	36
53300	55000	37
55000	56700	38
56700	58300	39
58300	----	40"

Compliance Demonstration

For P-42-88, the District Rule 3.4 emission limit is 0.1 lb/day of PM and the District Rule 3.4 process limit is 25 lb/day of steel shot. Since the daily emission rate is lower than the minimum hourly emission rate allowed by District Rule 2.19, the process of P-42-88 is in compliance with the rule.

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 applies to the metal parts and products coating operations of P-167-95, P-22-04(a), P-41-88(a1) and the coating of metal parts in the automotive and metal parts and products coating operation of P-133-95. The version of the rule used in this evaluation is the rule that was revised on April 27, 1994, and is part of the California SIP. The source is currently in compliance with the rule.

Rule Requirement #1 - Coating Limits Condition

Section 301 of Rule 2.25 reads:

"Except as indicated, effective April 27, 1994, a person shall not apply to metal parts and products any coatings, including any VOC-containing

materials added to the original coating supplied by the manufacturer, which contain VOC in excess of the limits in Table 3. [Rule 2.25, §301]

TABLE		
<i>Grams of VOC per Liter (or Pounds of VOC per Gallon) of Coating Less Water, and Less Exempt Compounds</i>		
COATING CATEGORY	VOC CONTENT G/L(LBS/GAL)	
	BAKED	AIR DRIED
<i>General Coatings</i>	<i>275 (2.3)</i>	<i>340 (2.8)</i>
<i>Specialty Coatings: Etching Filler</i>	<i>420 (3.5)</i>	<i>420 (3.5)</i>
<i>Solar-Absorbent</i>	<i>360 (3.0)</i>	<i>420 (3.5)</i>
<i>Heat-Resistant</i>	<i>360 (3.0)</i>	<i>420 (3.5)</i>
<i>High Gloss</i>	<i>360 (3.0)</i>	<i>420 (3.5)</i>
<i>Metallic</i>	<i>360 (3.0)</i>	<i>420 (3.5)</i>
<i>Extreme Performance</i>	<i>420 (3.5)</i>	<i>420 (3.5)</i>
<i>Silicone Release</i>	<i>420 (3.5)</i>	<i>420 (3.5)</i>
<i>High Performance Architectural</i>	<i>420 (3.5)</i>	<i>420 (3.5)</i>
<i>Camouflage</i>	<i>360 (3.0)</i>	<i>420 (3.5)</i>
<i>Vacuum-Metalizing</i>	<i>420 (3.5)</i>	<i>420 (3.5)</i>
<i>Mold-Seal</i>	<i>420 (3.5)</i>	<i>420 (3.5)</i>
<i>High Temperature</i>	<i>420 (3.5)</i>	<i>420 (3.5)</i>
<i>Pan Backing</i>	<i>420 (3.5)</i>	<i>420 (3.5)</i>
<i>Pretreatment Wash Primer*</i>	<i>420 (3.5)</i>	<i>420 (3.5)</i>

* *No maximum solids content restriction."*

The District has revised District Rule 2.25 and is taking steps to include the revised rule in the California SIP. 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.

Streamlining Demonstration: For P-41-88(a1) and P-22-04(a), under the authority of District Rule 3.4, New Source Review, the restriction on VOC content of coatings applied in the metal parts and products coating operations can be streamlined for the coating application usage proposed in the permit application resulting in the permitted process limits and evaluated emission limits.

Streamlined Permit Conditions For P-41-88(a1) and P-22-04(a)

The Permit Holder shall not apply any liquid coatings to metal parts and products, which contain VOC in excess of 2.3 pounds per gallon (275 grams per liter), including any VOC-containing materials added to the original liquid coatings supplied by the manufacturer, excluding water and exempt compounds. [District Rule 2.25, §301/C-02-142 and C-07-176]

Subsuming Demonstration: For P-41-88(a1) and P-22-04(a), the metal parts and products coating operations are subject to another federally enforceable coating VOC content restriction requirement based on the authority of District Rule 3.4 which is more stringent, and therefore, this Rule 2.25 requirement can be subsumed by the Rule 3.4 requirement.

Subsuming Permit Conditions For P-41-88(a1) and P-22-04(a)

The Permit Holder shall not apply to metal parts and products any powder coatings which contain VOC in excess of 0.01 pounds per pound of powder coating.
[District Rule 3.4/C-02-142 and C-07-176]

Rule Requirement #2 - Application Methods Condition

Section 302 of Rule 2.25 reads:

"a person shall not apply coatings to metal parts and products subject to the provisions of this rule unless the coatings are applied using properly operated equipment, and by using one of the following application methods or other high transfer efficiency application equipment which has been approved, in writing, by the Air Pollution Control Officer:

302.1 Electrostatic attraction operated in accordance with manufacturer's recommendations;

302.2 High-Volume, Low-Pressure (HVLP) spray system operated in accordance with manufacturer's recommendations;

302.3 Flow coat;

302.4 Dip coat;

302.5 Hand coat; or

302.6 Roll coat."

Rule Requirement #3 - Surface Preparation and Clean-Up Solvents

Section 304 of Rule 2.25 reads:

"304.1 Effective April 27, 1995 a person shall not use materials which have a VOC content in excess of 200 grams per liter of material for surface preparation unless such material has an initial boiling point of greater than 190°C as determined by the method specified in Section 501.6.

304.2 A person shall not use VOC-containing materials for the clean-up of equipment used in coating operations unless:

- a. Such material is collected in a container which is closed when not in use; and*
- b. 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. The alternative low emission washing system must have approval in writing by the Air Pollution Control Officer.*

304.3 *A person shall use closed containers for the disposal of cloth, paper, or other materials including solvent and spent solvent used for surface preparation, clean-up, and paint removal."*

The District has revised District Rule 2.25 and is taking steps to include the revised rule in the California SIP. 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.

Subsuming Demonstration: For P-41-88(a1) and P-22-04(a), the metal parts and products coating operations are subject to other federally enforceable solvent VOC content requirements based on the authority of District Rule 3.4 which are more stringent, and therefore, this Rule 2.31 requirement can be subsumed by the Rule 3.4 requirement.

Subsuming Permit Conditions for P-41-88(a1) and P-22-04(a)

The Permit Holder shall not use any VOC-containing solvent material for the preparation or cleanup of surfaces, the cleaning of spray equipment, or the removal of paint. [District Rule 3.4/C-02-142 and C-07-176]

Rule Requirement #4 - Prohibition of Specification Condition

Section 401 of Rule 2.25 reads:

"A person shall not specify the use of any coating to be applied to any metal parts and products subject to the provisions of this rule that does not meet the limits and requirements of this rule where such applications result in a violation of this rule. The requirements of this Section shall apply to all written or oral contracts."

Rule Requirement #5 - Qualification for Classification as Extreme Performance Coating Condition

Section 402 of Rule 2.25 reads:

"A person shall apply to the Air Pollution Control Officer to have a coating classified as an extreme performance coating prior to application of such coating. The Air Pollution Control Officer may classify a coating as an extreme performance coating provided that the petitioner demonstrates that the intended use of each coated object would require an extreme performance coating and has successfully demonstrated that general compliant coatings are unsuitable."

Rule Requirement #6 - Calculation for Determination of VOC Content Per Volume of Coating Condition

Section 404 of Rule 2.25 reads:

"The VOC content per volume of coating shall be calculated less water and less exempt compounds as follows:

$$VOC = \frac{W_s - W_w - W_{es}}{V_m - V_w - V_{es}}$$

where: W_s = Weight of volatile compounds in grams
 W_w = Weight of water in grams
 W_{es} = Weight of exempt compounds in grams
 V_m = Volume of coating materials in liters
 V_w = Volume of water in liters
 V_{es} = Volume of exempt compounds in liters"

Rule Requirement #7 - Calculation for Determination of VOC Content Per Volume of Surface Preparation or Cleanup Material Condition

Section 405 of Rule 2.25 reads:

"The VOC content per volume of surface preparation and cleanup materials is calculated using the following equation:

$$VOC = \frac{W_s - W_w - W_{es}}{V_m}$$

where: W_w = Weight of volatile compounds in grams
 W_w = Weight of water in grams
 W_{es} = Weight of exempt compounds in grams
 V_m = Volume of material in liters"

Rule Requirement #8 - Records Condition

Section 501 of Rule 2.25 reads:

501.1 Coating and Solvent Records: Any person subject to the requirements of Section 300 of this Rule shall maintain:

- a. A current list of coatings and solvents in use, which includes the following information:
 - (i) Name and manufacturer information;
 - (ii) Mixing instructions;
 - (iii) VOC content of coatings and surface preparation and cleanup solvents as applied;
 - (iv) Weight percent water;
 - (v) Weight percent exempt solvent; and
 - (vi) Thinning solvent composition and density
- b. The amounts of coatings and VOCs used according to the following schedule:
 - (i) Monthly records showing the types and amounts of coatings used that meet the coating standard contained in Section 301; and

- (ii) Daily records showing the types and amounts of coatings used that do not meet the requirements of Section 301, and whether such usage was in conjunction with emission control equipment.*
- c. Usage records of coatings that are exempt from the requirements of this rule by Section 110 can be kept on a quarterly basis.*
- d. Usage records of coatings shall be kept on a daily basis by those facilities, using less than one gallon per day, exempted under Section 112.*
- e. Monthly records showing the types and amounts of solvents used for surface preparation and cleanup.*

501.2 ***Emission Control Equipment Records:** Any person complying with the provisions of Section 301 by using air pollution control equipment shall maintain daily records of key system operating parameters, such as temperatures, pressures, and/or flowrates, for the emission control equipment which will demonstrate continuous operation and compliance of the equipment during periods of emission producing activity.*

501.3 ***Records Retention:** All records maintained pursuant to this Section shall be retained for the previous two calendar years, and shall be made available to the Air Pollution Control Officer upon request."*

The District has revised District Rule 2.25 and is taking steps to include the revised rule in the California SIP. 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 and District Rule 3.8, Federal Operating Permits.

Subsuming Demonstration: For P-41-88(a1), the metal parts and products coating operation is subject to another federally enforceable coating records requirements based on the authority of District Rule 3.8 which is more stringent, and therefore, this Rule 2.25 requirement can be subsumed by the Rule 3.8 requirement.

Subsuming Permit Condition for P-41-88(a1)

All required records shall be retained for a minimum of five (5) years and shall be made available to District personnel upon request. [District Rule 3.8, §302.6.b]

Subsuming Demonstration: For P-167-95, the metal parts and products coating operation of P-167-95 is subject to other federally enforceable coating records requirements based on the authority of District Rule 3.4 which are more stringent, and therefore, this Rule 2.25 requirements can be subsumed by the Rule 3.4 requirements.

Subsuming Permit Conditions for P-167-95

The Permit Holder shall maintain records on a daily basis that include the coating and mix ratio of components in the coating used, the quantity of each coating applied, and corresponding VOC emissions. [District Rule 2.25, §501.1 and District Rule 3.4/P-167-95]

The Permit Holder shall maintain a daily log of solvent use. This log shall include the type, name, VOC content as applied, amount of solvent used for cleanup and surface preparation, and corresponding VOC emissions.[District Rule 2.31, §501 and District Rule 3.4/P-167-95]

Rule Requirement #9 - Testing Procedures Condition

Section 502 of Rule 2.25 reads:

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- _____ "502.1 **VOC Content:** *The Volatile organic compound content of coatings and solvents subject to the provisions of this rule excluding exempt compounds shall be determined by procedures contained in EPA Reference Test Method 24 (40 CFR 60, Appendix A).*
- 502.2 **Exempt Compounds:** *Measurement of exempt compounds shall be conducted and reported in accordance with ASTM Test Method D 4457-85. For exempt compounds where no reference test method is available, a facility requesting the exemption shall provide appropriated test methods approved by the Air Pollution Control Officer and approvable by EPA.*
- 502.3 **Acid Content:** *Measurement of acid content shall be conducted and reported in accordance with ASTM Test Method D 1613-85.*
- 502.4 **Metal Content:** *Measurement of metal content shall be conducted and reported in accordance with the South Coast Air Quality Management District's Spectrographic Method 311.*
- 502.5 **Capture Efficiency:** *The measurement of capture efficiency of an emission control system shall be determined by and reported in accordance with 40 CFR 52.741, Appendix B, "VOM Measurement Techniques for Capture Efficiency".*
- 502.6 **Boiling Range of Liquid Containing VOC:** *Determinations of the initial boiling point of a liquid containing VOC shall be performed in accordance with ASTM Test Method D 1078-86.*

- 502.7 **Control Efficiency:** *Determination of control efficiency shall be conducted and reported in accordance with EPA Method 25A.*
- 502.8 **Solids Content:** *Measurement of solids content shall be conducted and reported in accordance with EPA Reference Test Method 24.*
- 502.9 **Transfer Efficiency:** *The transfer efficiency for alternative coating applications methods described in Section 302 of this Rule shall be determined in accordance with the South Coast Air Quality Management District "Procedure for Testing Spray Equipment Transfer Efficiency (TE)".*
- 502.10 **Spray Gun Cleaning Systems:** *The determination of emissions of VOC from spray gun cleaning systems shall be made using South Coast Air Quality Management District "General Test Method for Determining Solvent Losses from Spray Gun Cleaning Systems" dated October 3, 1989."*

RULE 2.26 Motor Vehicle and Mobile Equipment Coating Operations

Rule Description

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

Compliance Status

The rule applies to the automotive coating operation of P-53-88(a) and the automotive and metal parts and products coating operation of P-333-95. The version of the rule used in this evaluation is the rule that was adopted on April 27, 1994, and is part of the California SIP. The source is currently in compliance with the rule.

Rule Requirement #1 - Coating VOC Content Limits Condition

Section 301 of the rule reads:

"LIMITS: *Any person who applies coatings to Group I or II vehicles, mobile equipment, their parts and components, shall comply with Sections 301.1, 301.2, and 302 of this rule.*

- 301.1 **Group I Vehicles.** *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.

Table 5

COATING	JANUARY 1, 1995 VOC
Pretreatment Wash Primer	420 g/l (3.5 lbs/gal)
Precoat	420 g/l (3.5 lbs/gal)
Primer/Primer surfacer	250 g/l (2.1 lbs/gal)
Primer Sealer	340 g/l (2.8 lbs/gal)
Topcoat	460 g/l (3.8 lbs/gal)
Metallic/Iridescent Topcoat	540 g/l (4.5 lbs/gal)
Specialty Coating	840 g/l (7.0 lbs/gal)

301.2

Group II Vehicles and Mobile Equipment. *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."*

Table 6

COATING	JANUARY 1, 1995 VOC
Pretreatment Wash Primer	420 g/l (3.5 lbs/gal)
Precoat	420 g/l (3.5 lbs/gal)
Primer	250 g/l (2.1 lbs/gal)
Topcoat	340 g/l (2.8 lbs/gal)
Metallic/Iridescent Topcoat	420 g/l (3.5 lbs/gal)
Extreme Performance	420 g/l (3.5 lbs/gal)
Camouflage	420 g/l (3.5 lbs/gal)
Specialty Coating	840 g/l (7.0 lbs/gal)

The District has revised District Rule 2.26 and is taking steps to include the revised rule in the California SIP. 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.

Subsuming Demonstration: For P-53-88(a) and P-133-95 the automotive coating operations are subject to other federally enforceable coating VOC content restriction requirements based on the authority of District Rule 3.1 and District Rule 3.4 which are more stringent, and therefore, this Rule 2.26 requirement can be subsumed by the Rule 3.1 and Rule 3.4 requirements.

Subsuming Permit Condition for P-53-88(a) and P-133-95

The Permit Holder shall not apply to any motor vehicle, mobile equipment, or associated parts and components, any coating with a VOC regulatory content (less water and exempt compounds) in excess of the following limits:

Table 7

COATING TYPE	REGULATORY VOC CONTENT
Adhesion Promoter	540 g/l (4.5 lb/gal)
Clear Coating	250 g/l (2.1 lb/gal)
Color Coating	420 g/l (3.5 lb/gal)
Multi-Color Coating	680 g/l (5.7 lb/gal)
Pretreatment Coating	660 g/l (5.5 lb/gal)
Primer	250 g/l (2.1 lb/gal)
Primer Sealer	250 g/l (2.1 lb/gal)
Single-Stage Coating	340 g/l (2.8 lb/gal)
Temporary Protective Coating	60 g/l (0.5 lb/gal)
Truck Bed Liner Coating	310 g/l (2.6 lb/gal)
Underbody Coating	430 g/l (3.6 lb/gal)
Uniform Finish Coating	540 g/l (4.5 lb/gal)
Any Other Coating Type	250 g/l (2.1 lb/gal)

[District Rule 3.1, §402/P-133-95 and District Rule 3.4/C-10-30]

Rule Requirement #2 - Most Restrictive VOC Content Limit Condition

Section 301 of the rule reads:

LIMITS: Any person who applies coatings to Group I or II vehicles, mobile equipment, their parts and components, shall comply with Sections 301.1, 301.2, and 302 of this rule.

301.1 Group I Vehicles. 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.

Table 8

COATING	JANUARY 1, 1995 VOC
Pretreatment Wash Primer	420 g/l (3.5 lbs/gal)
Precoat	420 g/l (3.5 lbs/gal)
Primer/Primer surfacer	250 g/l (2.1 lbs/gal)

Primer Sealer	340 g/l (2.8 lbs/gal)
Topcoat	460 g/l (3.8 lbs/gal)
Metallic/Iridescent Topcoat	540 g/l (4.5 lbs/gal)
Specialty Coating	840 g/l (7.0 lbs/gal)

301.2 **Group II Vehicles and Mobile Equipment.** *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."*

Table 9

COATING	JANUARY 1, 1995 VOC
Pretreatment Wash Primer	420 g/l (3.5 lbs/gal)
Precoat	420 g/l (3.5 lbs/gal)
Primer	250 g/l (2.1 lbs/gal)
Topcoat	340 g/l (2.8 lbs/gal)
Metallic/Iridescent Topcoat	420 g/l (3.5 lbs/gal)
Extreme Performance	420 g/l (3.5 lbs/gal)
Camouflage	420 g/l (3.5 lbs/gal)
Specialty Coating	840 g/l (7.0 lbs/gal)

The District has revised District Rule 2.26 and is taking steps to include the revised rule in the California SIP. 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.

Subsuming Demonstration: For P-53-88(a) and P-133-95 the automotive coating operations are subject to other federally enforceable coating VOC content restriction requirements based on the authority of District Rule 3.1 and District Rule 3.4 which are more stringent, and therefore, this Rule 2.26 requirement can be subsumed by the Rule 3.1 and Rule 3.4 requirements.

Subsuming Permit Condition for P-53-88(a) and P-133-95

If anywhere on the container of any automotive coating, or any label or sticker affixed to the container, or in any sales, advertising, or technical literature, any representation is made that indicates that the coating meets the definition of or is recommended for use for more than one of the coating categories listed above, then the lowest VOC content limit shall apply. [District Rule 3.1, §402/P-133-95 and District Rule 3.4/C-10-30]

Rule Requirement #3 - Lacquer Spot/Panel Repair Limits Condition

Section 303 of the rule reads:

"A person shall not spot/panel repair Group I Vehicles with existing lacquer finishes using any coating with a VOC content in excess of the standards set forth in Section 301.1 of this Rule."

Rule Requirement #4 - Coating Application Methods Condition

Section 303 of the rule reads:

"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."

The District has revised District Rule 2.26 and is taking steps to include the revised rule in the California SIP. 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.

Subsuming Demonstration: P-53-88(a) and P-133-95 the automotive coating operations are subject to other federally enforceable coating application requirements based on the authority of District Rule 3.1 and District Rule 3.4 which are more stringent, and therefore, this Rule 2.26 requirement can be subsumed by the Rule 3.1 and Rule 3.4 requirements.

Subsuming Permit Condition for P-53-88(a) and P-133-95

The Permit Holder shall not apply any coating to any motor vehicle, mobile equipment, or associated parts and components by any method other than high volume low pressure (HVLP) spray equipment, unless such equipment has written approval from the District. [District Rule 3.1, §402/P-133-95 and District Rule 3.4/C-10-30]

Rule Requirement #5 - Surface Preparation and Clean-Up Solvent Condition

Section 304 of the rule reads:

"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 and 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."*

The District has revised District Rules 2.26 and 2.31 and is taking steps to include the revised rules in the California SIP. Until the revised rules are included in the plan, the requirements of the current SIP rules can be subsumed by the authority of District Rule 3.4, New Source Review.

Subsuming Demonstration: For P-53-88(a) and P-133-95 the automotive coating operations are subject to other federally enforceable storage and disposal requirements based on the authority of District Rule 3.1 and District Rule 3.4 which are more stringent, and therefore, the Rule 2.26 and 2.31 requirements can be subsumed by the Rule 3.1 and Rule 3.4 requirements.

Subsuming Permit Conditions for P-53-88(a) and P-133-95

Until January 1, 2011, the maximum VOC content of solvents used for product cleaning, and the cleaning of coating equipment shall not exceed 50 g/l (0.42 lb/gallon). [District Rule 3.1, §402/P-133-95 and District Rule 3.4/C-10-30]

Effective January 1, 2011, the maximum VOC content of solvents used for product cleaning, and the cleaning of coating equipment shall not exceed 25 g/l (0.21 lb/gallon). [District Rule 3.1, §402/P-133-95 and District Rule 3.4/C-10-30]

The Permit Holder shall not use VOC containing materials with a VOC content greater than 25 g/l (0.21 lb/gallon) for the cleanup of coating equipment unless:

- a. The system must fully enclose the spray guns, cups, nozzles, bowls, and other parts during washing, rinsing and draining procedures;
- b. The system must be used according to the manufacturer's recommendations; and
- c. The system must be closed when not in use. [District Rule 3.1, §402/P-133-95 and District Rule 3.4/C-10-30]

The Permit Holder shall use closed containers for the storage or disposal of cloth, paper, or other VOC containing materials (including paint, thinners, catalysts, reducers, solvent and spent solvent used for surface preparation, clean-up, and coating applications). [District Rule 3.1, §402/P-133-95 and District Rule 3.4/C-10-30]

Rule Requirement #6 - Small Production/Utility Bodies Condition

Section 305 of the rule reads:

“The standards set forth in Section 301.1 of this rule shall apply provided production of utility bodies where the coating is required to match that of the vehicles upon which they will be mounted is less than or equal to 20 vehicles per day. The standards set forth in Section 301.2 of this rule shall apply provided production of utility bodies is greater than 20 vehicles per day. Daily records must be maintained on the number of utility bodies coated each day and such records shall be retained for the previous 24 month period and be made available at the time of inspection.”

The District has revised District Rule 2.26 and is taking steps to include the revised rule in the California SIP. 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.

Subsuming Demonstration: For P-53-88(a) and P-133-95 the automotive coating operations are subject to other federally enforceable coating VOC content restriction requirements based on the authority of District Rule 3.1 and District Rule 3.4 which are more stringent, and therefore, this Rule 2.26 requirement can be subsumed by the Rule 3.1 and Rule 3.4 requirements.

Subsuming Permit Condition for P-53-88(a) and P-133-95

The Permit Holder shall not apply to any motor vehicle, mobile equipment, or associated parts and components, any coating with a VOC regulatory content (less water and exempt compounds) in excess of the following limits:

Table 10

COATING TYPE	REGULATORY VOC CONTENT
Adhesion Promoter	540 g/l (4.5 lb/gal)
Clear Coating	250 g/l (2.1 lb/gal)
Color Coating	420 g/l (3.5 lb/gal)
Multi-Color Coating	680 g/l (5.7 lb/gal)
Pretreatment Coating	660 g/l (5.5 lb/gal)
Primer	250 g/l (2.1 lb/gal)
Primer Sealer	250 g/l (2.1 lb/gal)
Single-Stage Coating	340 g/l (2.8 lb/gal)
Temporary Protective Coating	60 g/l (0.5 lb/gal)

Truck Bed Liner Coating	310 g/l (2.6 lb/gal)
Underbody Coating	430 g/l (3.6 lb/gal)
Uniform Finish Coating	540 g/l (4.5 lb/gal)
Any Other Coating Type	250 g/l (2.1 lb/gal)

[District Rule 3.1, §402/P-133-95 and District Rule 3.4/C-10-30]

Rule Requirement #7 - Specialty Coatings Condition

Section 306 of the rule reads:

“A person shall not use any specialty coating with a VOC content in excess of 840 g/l (7.0 pounds per gallon), excluding water and exempt compounds. Use of all specialty coatings except antiglare/safety coatings shall not exceed 5.0 percent of all coatings applied, on a monthly basis. The application of topcoats with a specialty coating used as an additive shall be subject to the topcoat limits in Sections 301.1, 301.2 and 302 of this Rule.”

The District has revised District Rule 2.26 and is taking steps to include the revised rule in the California SIP. 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.

Subsuming Demonstration: For P-53-88(a) and P-133-95 the automotive coating operations are subject to other federally enforceable coating VOC content restriction requirements based on the authority of District Rule 3.1 and District Rule 3.4 which are more stringent, and therefore, this Rule 2.26 requirement can be subsumed by the Rule 3.1 and Rule 3.4 requirements.

Subsuming Permit Condition for P-53-88(a) and P-133-95

The Permit Holder shall not apply to any motor vehicle, mobile equipment, or associated parts and components, any coating with a VOC regulatory content (less water and exempt compounds) in excess of the following limits:

Table 11

COATING TYPE	REGULATORY VOC CONTENT
Adhesion Promoter	540 g/l (4.5 lb/gal)
Clear Coating	250 g/l (2.1 lb/gal)
Color Coating	420 g/l (3.5 lb/gal)
Multi-Color Coating	680 g/l (5.7 lb/gal)
Pretreatment Coating	660 g/l (5.5 lb/gal)
Primer	250 g/l (2.1 lb/gal)
Primer Sealer	250 g/l (2.1 lb/gal)
Single-Stage Coating	340 g/l (2.8 lb/gal)
Temporary Protective Coating	60 g/l (0.5 lb/gal)
Truck Bed Liner Coating	310 g/l (2.6 lb/gal)

Underbody Coating	430 g/l (3.6 lb/gal)
Uniform Finish Coating	540 g/l (4.5 lb/gal)
Any Other Coating Type	250 g/l (2.1 lb/gal)

[District Rule 3.1, §402/P-133-95 and District Rule 3.4/C-10-30]

Rule Requirement #8 - Prohibition of Specification Condition

Section 402 of the rule reads:

"No person shall solicit or require for use or specify the application of a coating on a Group I or II vehicle, mobile equipment, or part or component thereof if such use or application results in a violation of the provisions of this Rule. The prohibition of this Section will apply to all written or oral contracts under the terms of which any coating which is subject to the provisions of this Rule is to be applied to any motor vehicle, mobile equipment, or part or component at any physical location within the District."

Rule Requirement #9 - Prohibition of Sale Condition

Section 403 of the rule reads:

"A person shall not offer for sale or sell within the District any coating if such product is prohibited by any of the provisions of this Rule. The prohibition of this section shall apply to the sale of any coating which will be applied at any physical location within the jurisdiction of the local air pollution control agencies. This requirement shall not apply to the application of coatings where emissions to the atmosphere are controlled to an equivalent level of this Rule by air pollution abatement equipment that has been approved in writing by the Air Pollution Control Officer."

Rule Requirement #10 - Analysis of Samples Condition

Section 501 of the rule reads:

"Samples of volatile organic compounds as specified in Sections 301.1, 301.2, and 302 of this Rule shall be analyzed as prescribed by EPA Reference Method 24, "Determination of Volatile Matter Content, Water Content, Density, Volume Solids, and Weight Solids of Surface Coatings"."

Rule Requirement #11 - Determination of Emissions Condition

Section 502 of the rule reads:

"Emissions of volatile organic compounds as specified in Section 301.1, 301.2, and 302 of this Rule shall be measured as prescribed by EPA Reference Method 25, "Determination of Total Gaseous Organic Concentration Using a Flame Ionization Analyzer"."

Rule Requirement #12 - Determination of Transfer Efficiency Condition

Section 503 of the rule reads:

"Transfer efficiency as required by Section 303.3 of this Rule shall be determined IN ACCORDANCE with the South Coast Air Quality Management District (SCAQMD) "SCAQMD Procedure for Testing Spray Equipment Transfer Efficiency (TE)"." _

Rule Requirement #13 - Determination of Capture Efficiency Condition

Section 504 of the rule reads:

"Capture efficiency as required by Section 301.1, 301.2 and 302 of this rule shall be determined by and reported in accordance with 40 CFR 52.741, Appendix B, "VOM Measurement Techniques for Capture Efficiency"." _

Rule Requirement #14 - Determination of Iridescent Particles in Metallic/Iridescent Topcoat Condition

Section 505 of the rule reads:

"Iridescent particles in metallic/iridescent topcoat as defined, in Section 220 of this Rule shall be determined by the South Coast Air Quality Management District (SCAQMD) Spectrographic method contained in Section 3, Method 311 of the SCAQMD "Laboratory Method of Analysis for Enforcement Samples" manual."

Rule Requirement #15 - Determination of Acid Concentration in Pretreatment Wash Primer Condition

Section 506 of the rule reads:

"Acid concentration in pretreatment wash primer as defined in Section 223 of this Rule shall be determined by ASTM Test Method D-1613-85 (modified)." _

Rule Requirement #16 - Records Condition

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."*

The District has revised District Rule 2.26 and is taking steps to include the revised rule in the California SIP. 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.

Subsuming Demonstration: For P-53-88(a) and P-133-95 the automotive coating operations are subject to other federally enforceable coating records requirements based on the authority of District Rule 3.1 and District Rule 3.4 which are more stringent, and therefore, this Rule 2.26 requirement can be subsumed by the Rule 3.1 and Rule 3.4 requirements.

Subsuming Permit Conditions for P-53-88(a) and P-133-95

The Permit Holder shall maintain a current list that includes the following for all VOC containing materials:

- a. Material name and manufacturer's product data sheet or material safety data sheet (MSDS);
- b. Material application method;
- c. Material category and specific mix ratio;
- d. Actual VOC content (in g/l or lb/gallon); and
- e. As-applied regulatory VOC content (in g/l or lb/gallon). [District Rule 3.4/C-10-30]

The Permit Holder shall maintain records on a daily basis that include the coatings used, the quantity and mix ratio of each coating applied, and the corresponding VOC emissions. [District Rule 3.1, §402/P-133-95 and District Rule 3.4/C-10-30]

The Permit Holder shall maintain purchase records identifying the type, name, and volume of each VOC containing material, and any other records necessary to demonstrate compliance with this permit. [District Rule 3.4/C-10-30]

All required records shall be retained for a minimum of five (5) years and shall be made available for District inspection upon request. [District Rule 3.4/C-10-30]

Rule Requirement #17 - Toxic Air Contaminants Condition

The version of Rule 2.26 in the California SIP does not contain any limitation on the content of toxic air contaminants in the various coating categories, but the amended rule prohibits sources from applying to motor vehicles, mobile equipment, or associated parts and components any coating containing cadmium or hexavalent chromium.

The automotive coating operations of P-53-88(a) and P-133-95 are subject to an additional federally enforceable coating content restriction based on the authority of District Rule 3.1 and District Rule 3.4. Because this additional coating content restriction is in addition to the VOC content restrictions of the SIP approved rule, the amended Rule 2.26 requirements can be added by the authority of Rule 3.1 and Rule 3.4.

Permit Condition for P-53-88(a) and P-133-95

The Permit Holder shall not use or possess any automotive coatings containing hexavalent chromium or cadmium. [District Rule 3.1, §402/P-133-95 and District Rule 3.4/C-10-30]

RULE 2.29 Graphic Arts Printing Operations

Rule Description

The purpose of this rule is to limit the emission of VOCs from graphic arts operations.

Compliance Status

The version of the rule used in this evaluation is the rule that was adopted on May 25, 1994, and is part of the California SIP. The letterpress and silkscreen printing operation of P-77-92(a) is not subject to the requirements of this rule due to the permitted emission limits for P-77-92(a) and the exemption for small users listed in Section 110 of the rule.

Rule Requirement #1 - Coating VOC Content Limits Condition

Section 110 of the rule reads:

- “110.1 Until January 1, 1995, the requirements of this Rule shall not apply to any facility which conducts graphic arts operations which emits less than 30 pounds of volatile organic compounds per operating day (calculation of emissions shall not include surface preparation or cleanup solvent).*
- 110.2 Effective January 1, 1995, the requirements of this Rule shall not apply to any facility that emits less than 400 pounds of volatile organic compounds in any month from graphic arts operations, including surface preparation and cleanup solvents. For the purpose of calculating exemption applicability, emissions of volatile organic compounds from the use of nonheatset lithographic ink shall be determined by the test methods specified in Sections 504.1 or 504.2 of this Rule.*
- 110.3 Any person claiming an exemption under this Section shall have information available, such as purchase orders or hazardous waste manifests, that would allow the Air Pollution Control Officer to verify facility usage.”*

The permitted usage limits of P-77-92(a) establish that the VOC emissions of the graphic arts printing operation meet the small usage exemption of section 110.2 of the rule.

Subsuming Demonstration: For P-77-92(a) the letterpress and silkscreen printing operation is subject to other federally enforceable coating and solvent usage tracking requirements based on the authority of District Rule 3.4 which are more stringent than the requirement of section 110.3, and therefore, this Rule 2.29 requirement can be subsumed by the Rule 3.4 requirements.

Subsuming Permit Conditions for P-77-92(a)

The Permit Holder shall on a monthly basis record the type, the amount, and the as-applied VOC-content of each ink and adhesive used in the printing operation. [District Rule 3.4/C-06-64]

The Permit Holder shall on a monthly basis record the type, the amount, and the as-applied VOC-content of each solvent used in the printing operation. [District Rule 3.4/C-06-64]

RULE 2.31 Surface Preparation and Cleanup

Rule Description

The purpose of this rule is to limit the emissions of volatile organic compounds (VOC) from surface preparation and clean up, and from the storage and disposal of materials used for surface preparation and cleanup.

Compliance Status

The rule applies to the solvent usage in the graphic arts printing operation of P-77-92(a), the wood products coating operation of P-3-90, the metal parts and products coating operations of P-167-95, P-22-04(a), P-41-88(a1), the automotive coating operation of P-53-88(a), and the automotive and metal parts and products coating operation of P-133-95. The version of the rule used in this evaluation is the rule that was adopted on April 27, 1994, and is part of the California SIP. The source is currently in compliance with the rule.

Rule Requirement #1 - Solvent VOC Content Condition

Section 301 of the rule reads:

"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*

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)."*

The District has revised District Rule 2.31 and is taking steps to include the revised rule in the California SIP. 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.

Subsuming Demonstration: For P-53-88(a), P-3-90, P-167-95, and P-133-95 coating operations are subject to another federally enforceable solvent VOC content requirement based on the authority of District Rule 3.1 District Rule 3.4 which is more stringent, and therefore, this Rule 2.31 requirement can be subsumed by the Rule 3.1 and Rule 3.4 requirements.

Subsuming Permit Condition for P-53-88(a), P-3-90, P-167-95, and P-133-95

Effective January 1, 2011, the maximum VOC content of solvents used for product cleaning, and the cleaning of coating equipment shall not exceed 25 g/l (0.21 lb/gallon). [District Rule 3.1, §402/P-3-90, P-167-95,P-133-95 and District Rule 3.4/C-10-30]___

Subsuming Demonstration: For P-77-92(a) the graphic arts printing operation is subject to other federally enforceable solvent VOC content requirements based on the authority of District Rule 3.4 which is more stringent, and therefore, this Rule 2.31 requirement can be subsumed by the Rule 3.4 requirement.

Subsuming Permit Conditions for P-77-92(a)

The maximum as-applied VOC-content of solvents used to clean silkscreen ink from application equipment shall not exceed 100 g/L. [District Rule 3.1, §402/P-77-92(a)]

The maximum as-applied VOC-content of solvents used to clean letterpress ink from application equipment shall not exceed 238 g/L. [District Rule 3.1, §402/P-77-92(a)]

The maximum as-applied VOC-content of solvents used to all other materials from application equipment shall not exceed 25 g/L. [District Rule 3.1, §402/P-77-92(a)]

Subsuming Demonstration: For P-41-88(a1) and P-22-04(a) the metal parts and products coating operation are subject to other federally enforceable solvent VOC content requirements based on the authority of District Rule 3.4 which is more stringent, and therefore, this Rule 2.31 requirement can be subsumed by the Rule 3.4 requirement.

Subsuming Permit Conditions for P-41-88(a1) and P-22-04(a)

The Permit Holder shall not use any VOC-containing solvent material for the preparation or cleanup of surfaces, the cleaning of spray equipment, or the removal of paint. [District Rule 3.4/C-02-142 and C-07-176]

Rule Requirement #2 - Cleaning Methods Condition

Sections 302 of the rule reads:

"A person shall not perform solvent cleaning operations unless one of the following cleaning devices or methods is used:

302.1 *Wipe cleaning;*

- 302.2 *Spray bottles or containers with a maximum capacity of 16 fluid ounces from which solvents are applied without a propellant-induced force;*
- 302.3 *Cleaning equipment which has a solvent container that can be, and is, closed during cleaning operations, except when depositing and removing objects to be cleaned, and is closed during non-operation with the exception of maintenance and repair to the cleaning equipment itself;*
- 302.4 *Cleaning device or mechanism which has been determined by the Air Pollution Control Officer to result in equivalent or lower emissions;*
- 302.5 *Remote reservoir cold cleaner used pursuant to Section 303 of this Rule;*
- 302.6 *Non-atomized solvent flow method where the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or*
- 302.7 *Solvent flushing method where the cleaning solvent is discharged into a container which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping."*

The District has revised District Rule 2.31 and is taking steps to include the revised rule in the California SIP. 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.

Subsuming Demonstration: For P-53-88-(a), P-77-92(a), P-167-95, P-133-95, and P-3-90 the coating operations subject to other federally enforceable solvent cleaning method requirements based on the authority of District Rule 3.1 and District Rule 3.4 which is more stringent, and therefore, this Rule 2.31 requirement can be subsumed by the Rule 3.1 and Rule 3.4 requirement.

Subsuming Permit Conditions

A person shall not perform surface preparation and cleanup unless one of the following cleaning devices or methods is used:

- a. Wipe Cleaning;
- b. Spray bottles or containers with a maximum capacity of 16 fluid ounces from which solvents are applied without a propellant-induced force; or
- c. Any other method approved by the District. [District Rule 3.1, §402/P-77-92(a), P-167-95, P-133-95 and District Rule 3.4/C-10-30]

Any person owning or operating any device used to clean spray equipment for coating applications shall comply with all the following requirements in addition to applicable VOC limits:

- a. The system must fully enclose the spray guns, cups, nozzles, bowls, and other parts during washing, rinsing and draining procedures;
- b. The system must be used according to the manufacturer's recommendations; and
- c. The system must be closed when not in use. [District Rule 3.1, §402/P-77-92(a), P-167-95, P-133-95 and District Rule 3.4/C-10-30]

Rule Requirement #3 - Remote Reservoir Cold Cleaners Condition

Section 303 of the rule reads:

"Any person owning or operating a remote reservoir cold cleaner shall comply with all of the following requirements:

- 303.1 *Prevent solvent vapors from escaping from the solvent container by using such devices as a cover or a valve when the remote reservoir is not being used, cleaned, or repaired;*
- 303.2 *Limit draft rate in the work room, as measured within three (3) feet from the location of the solvent discharge and parallel to the plane of the remote reservoir cold cleaner opening, to less than 9.1 meters per minute (30 feet per minute), unless necessary to meet Occupational Health and Safety Administration (OSHA) requirements;*
- 303.3 *Direct solvent flow in a manner that will prevent liquid solvent from splashing outside of the remote reservoir cold cleaner;*
- 303.4 *Do not degrease porous or absorbent materials, such as cloth, leather, rope, and wood; and*
- 303.5 *Use only solvent containers free of all liquid leaks. Auxiliary equipment, such as pumps, pipelines, or flanges shall not have any liquid leaks, visible tears, or cracks. Any liquid leak, visible tear, or crack detected shall be repaired within one calendar day, or the leaking section of the remote reservoir cold cleaner shall be drained of all solvent and shut down until it is replaced or repaired."*

Rule Requirement #4 - Storage and Disposal Condition

Section 304 of the rule reads:

"All VOC-containing materials used in solvent cleaning operations, regardless of their VOC-content, such as solvents, and cloth and paper moistened with solvents, shall be stored in non-absorbent, non-leaking containers which shall be kept closed at all times except when filling or emptying."

The District has revised District Rule 2.31 and is taking steps to include the revised rule in the California SIP. 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.

Subsuming Demonstration: For P-53-88(a), P-77-92(a), P-167-95, P-133-95, P-3-90, P-41-88(a1) and P-22-04(a) the coating operations are subject to another federally enforceable storage and disposal requirement based on the authority of District Rule 3.1 and District Rule 3.4 which is more stringent, and therefore, this Rule 2.31 requirement can be subsumed by the Rule 3.1 and Rule 3.4 requirements.

Subsuming Permit Condition

The Permit Holder shall use closed containers for the storage or disposal of cloth, paper, or other VOC containing materials (including paint, thinners, catalysts, reducers, solvent and spent solvent used for surface preparation, clean-up, and coating applications). [District Rule 3.1, §402/P-77-92(a), P-167-95, P-133-95, P-3-90, P-41-88(a1), P-22-04(a) and District Rule 3.4/C-10-30]

Rule Requirement #5 - Control Equipment Condition

Section 305 of the rule reads:

"In lieu of complying with the requirements in Sections 301, 302, or 306.1 of this Rule, a person may comply by using collection and control systems in association with the solvent cleaning operation subject to this Rule provided:

- 305.1 *The collection system collects at least 90 percent, by weight, of the emissions generated by the solvent cleaning operation; and the control system reduces VOC emissions from the emission collection system by at least 95 percent, by weight; or*
- 305.2 *The collection system collects at least 90 percent, by weight, of the emissions generated by the solvent cleaning operation; and the output of the control system is less than 50 parts per million weight (ppmw) calculated as carbon with no dilution."*

Rule Requirement #6 - General Prohibitions Condition

Section 306 of the rule reads:

- “306.1 On or after January 1, 1996, a person shall not atomize any solvent into open air.*
- 306.2 On or after January 1, 1996, a person shall not specify or require any person to use solvent or equipment subject to the provisions of this Rule that do not meet the requirements of this Rule.”*

Rule Requirement #7 - Records Condition

Section 501 of the rule reads:

“Records shall be maintained pursuant to this Section, for all applications subject to this Rule, including those exempted under Sections 110 through 118 of this Rule, except for cleaning operations performed with a solvent which has a water content of 98 percent or more, by weight, or a VOC composite partial pressure of 0.1 mm Hg or less at 20°C (68°F). Each owner or operator of a facility subject to the provisions of this Rule shall collect and record all information necessary to demonstrate daily compliance with the requirements of Section 300 of this Rule or with the exemption conditions of Sections 110 through 118 of this Rule, and shall maintain this information at the facility for a period of two years. The information shall be collected and recorded monthly, and shall be made available to the Air Pollution Control Officer upon request. The information shall include, but not limited to, the following:

- 501.1 Identification of each solvent cleaning operation and other process at the facility subject to this Rule. the identification shall include location, permit number (if applicable), description of activity, and substrate type;*
- 501.2 The amount and type of each VOC-containing material used at each operation and process, including exempt compounds. Use of amounts of one pint per week or less may be recorded on a monthly basis;*
- 501.3 The VOC content of each VOC-containing material;*
- 501.4 Where applicable, the vapor pressure of each VOC-containing material; and*
- 501.5 Records demonstrating compliance with Section 305 of this Rule.”*

The District has revised District Rule 2.31 and is taking steps to include the revised rule in the California SIP. 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.

Subsuming Demonstration: For P-53-88(a), P-77-92(a), P-167-95, P-133-95, P-3-90, P-41-88(a1) and P-22-04(a) the coating operations are subject to another federally enforceable record keeping requirement based on the authority of District Rule 3.1 and District Rule 3.4 which is more stringent, and therefore, this Rule 2.31 requirement can be subsumed by the Rule 3.1 and Rule 3.4 requirements.

Subsuming Permit Conditions

The Permit Holder shall maintain a current list that includes the following for all VOC containing materials:

- a. Material name and manufacturer's product data sheet or material safety data sheet (MSDS);
- b. Material application method;
- c. Material category and specific mix ratio;
- d. Actual VOC content (in g/l or lb/gallon); and
- e. As-applied regulatory VOC content (in g/l or lb/gallon). [District Rule 3.1, §402/P-77-92(a), P-167-95, P-133-95, P-3-90, P-41-88(a1), P-22-04(a) and District Rule 3.4/C-10-30]

The Permit Holder shall maintain records on a monthly basis that include the solvents used, the quantity and mix ratio of each solvent applied, and the corresponding VOC emissions. [District Rule 3.1, §402/P-77-92(a), P-167-95, P-133-95, P-3-90, P-41-88(a1), P-22-04(a) and District Rule 3.4/C-10-30]

All required records shall be retained for a minimum of five (5) years and shall be made available for District inspection upon request. [District Rule 3.1, §402/P-77-92(a), P-167-95, P-133-95, P-3-90, P-41-88(a1), P-22-04(a) and District Rule 3.4/C-10-30]

The Permit Holder shall maintain purchase records identifying the type, name, and volume of each VOC containing material, and any other records necessary to demonstrate compliance with this permit. [District Rule 3.1, §402/P-77-92(a), P-167-95, P-133-95, P-3-90, P-41-88(a1), P-22-04(a) and District Rule 3.4/C-10-30]

Rule Requirement #8 - Test Methods Condition

Section 502 of the rule reads:

"For the purposes of this Rule, the following test methods shall be used. Other test methods determined to be equivalent and approved in writing by the District, Air Resources Board, and the US Environmental Protection Agency may also be used. VOC emissions or other parameters determined to exceed any limits established by this Rule through the use of any of the following test methods shall constitute a violation of this Rule.

- 502.1 The VOC content of materials subject to the provisions of this Rule shall be determined by EPA Reference Test Method 24 (40 CFR 60, Appendix A).*
- 502.2 The efficiency of the emissions collection system shall be determined by the EPA method described at 40 CFR 52.741(a)(4)(iii).*
- 502.3 The efficiency of the control device shall be determined by the EPA method described at 40 CFR 52.741(a)(4)(iv). The VOC content measured and calculated as carbon in the control device shall be determined by EPA Reference Test Method 25 or 25A (40 CFR 60, Appendix A).*
- 502.4 The identity of components in solvents shall be determined by EPA Reference Test Method 18 (40 CFR 60, Appendix A).*
- 502.5 Vapor pressure of a VOC shall be determined by ASTM Test Method D 2879-86 or may be obtained from a published source such as: Boublik, T., V. Freid and E. Hala, "The Vapor Pressure of Pure Substances", Elsevier Scientific Publishing Co., New York (1973), Perry's Chemical Engineer's Handbook, McGraw-Hill Book Company (1984), CRC Handbook of Chemistry and Physics, Chemical Rubber Publishing Company (1986-87), and Lange's Handbook of Chemistry, John A. Dean, editor, McGraw-Hill Book Company (1985).*
- 502.6 Measurement of average workroom draft rate shall be measured parallel to the remote reservoir cold cleaner opening with a thermistor anemometer which has an accuracy of ± 2 percent of reading plus 1/2 percent of full scale and is annually factory-calibrated in a National Institute of Standards and Technology traceable wind tunnel."*

RULE 2.32 Stationary Internal Combustion Engines

Rule Description

The purpose of this rule is to limit the emission of NOx and CO from stationary internal combustion engines.

Compliance Status

Except for the requirement to maintain a log of operating hours of an engine, this rule does not apply to the emergency engines of P-28-95, P-29-95, P-30-95, P-31-95, P-64-04, and P-51-10.

Rule Requirement #1 - Exemption Records Condition

Section 503 of the rule reads:

"An owner or operator claiming an exemption under Sections 110.2 or 110.3 of this Rule shall maintain a log of operating hours for each engine. The log of operating hours shall be retained for two years and be made available to the Air Pollution Control Officer upon request."

Subsuming Demonstration: emergency internal combustion engines of P-27-95, P-28-95, P-29-95, P-30-95, P-31-95, and P-64-04 are subject to another federally enforceable record keeping requirement based on the authority of District Rule 3.4 which is more stringent, and therefore, this Rule 2.32 requirement can be subsumed by the Rule 3.4 requirement.

Subsuming Permit Conditions For P-27-95, P-28-95, P-29-95, P-30-95, P-31-95, and P-64-04

The Permit Holder shall maintain a log of the operation hours for this internal combustion engine identifying the type of usage (either maintenance or emergency), the duration and date of each usage. The log shall be retained for a period of five (5) years and be made available to District personnel upon request. [District Rule 3.4, §501/P-27-95, P-28-95, P-29-95, P-30-95, P-31-95, and C-02-360

Subsuming Demonstration: For P-51-10 the emergency internal combustion engine is subject to another federally enforceable record keeping requirement based on the authority of District Rule 3.4 which is more stringent, and therefore, this Rule 2.32 requirement can be subsumed by the Rule 3.4 requirement.

Subsuming Permit Condition For P-51-10

The Permit Holder shall retain the log for a minimum of sixty (60) months from the date of entry. Log entries made within twenty-four (24) months of the most recent entry shall be retained on-site and made immediately available to the District staff upon request. Log entries made from twenty-five (25) to sixty (60) months from most recent entry shall be made available to District staff within five (5) working days from request. [District Rule 3.4 and Title 17 CCR, Section 93115.10(g)(2)/C-08-258]

RULE 2.39 Wood Products Coating Operations

Rule Description

The purpose of this rule is to establish limits on the emissions of volatile organic compounds from wood and wood products coating operations.

Compliance Status

The source is currently in compliance with the rule. The rule is not contained in the California SIP and thus the conditions of the rule are not federally enforceable. Conditions from the rule were erroneously placed on previous modifications of the Title V permit, but will be removed from the Title V permit renewal and remain locally enforceable.

Permit Conditions

No conditions are required.

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 version of the rule used in this evaluation is the rule adopted on February 23, 1994, and is part of the California SIP. The source is currently in compliance with the rule.

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]

This permit shall not be transferable, by operation of law or otherwise, from one location to another or from one piece of equipment to another. It shall be the transferee's responsibility to inform the District on assumption of ownership or

operating control of any item under a permit from the District and for which a PTO will be required. For any such transfer as herein above described, said transferee shall submit an application for authorization in accordance with applicable District Rules. [District Rule 3.1, §304]

This permit to operate shall be renewable annually on the permit's anniversary date, commencing one year after the date of issuance. The Permit Holder shall pay a fee for the annual permit renewal. If the annual renewal fee is not paid by the specified due date, the District shall assess a penalty of not more than 50% of the fee due. Non-payment of renewal fees is grounds for permit cancellation. [District Rule 3.1, §305 and District Rule 4.1, §303 and §401]

Commencing work or operation under this permit shall be deemed acceptance of all of the conditions so specified. [District Rule 3.1, §402]

The Permit Holder shall maintain a list of the current wood-working equipment used at the facility. The list shall contain the horsepower rating of the equipment and be maintained with the permit. [District Rule 3.1, §402/P-35-92]

The Permit Holder shall maintain records of the natural gas usage (in cubic feet) on a quarterly and yearly basis. The records shall be retained for a period of five years and shall be made available to the District upon request. [District Rule 3.1, §402/P-55-97]

The Permit Holder shall submit an annual throughput/production report at the end of each calendar year for each emissions unit. This report is due no later than March 31 for the previous year. This report must include actual operating hours and actual amounts of materials processed (for materials that have process limits listed on the PTOs). Each type of material and each type of process must be listed separately. [District Rule 3.1, §405.1]

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]

The Permit Holder shall firmly affix this permit to operate, an approved facsimile, or other approved identification bearing the permit number upon the facility, article, machine, equipment, or other contrivance in such a manner as to be clearly visible and accessible. In the event that the facility, article, machine, equipment, or other contrivance is so constructed or operated that the permit to operate cannot be so

placed, the permit to operate shall be mounted so as to be clearly visible in an accessible place within 25 feet of the facility, article, machine, equipment, or other contrivance, or maintained readily available at all times on the operating premises. [District Rule 3.1, §408]

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 rule is applicable to all of the emission units at the facility. The source is currently in compliance with the rule. These New Source Review requirements are contained in the most recent Authorities to Construct issued to the source.

Permit Conditions

Permitted Emission Limits:

The emission limits of each permitted emissions unit at the stationary source is summarized in Table 12 below.

Table 12- Permitted Emission Limits for Each Emissions Unit

Permit	Pollutant	Daily [lb]	Qtr #1 (Jan 1- Mar 31) [lb]	Qtr #2 (Apr 1- June 30) [lb]	Qtr #3 (July 1- Sept 30) [lb]	Qtr #4 (Oct 1- Dec 31) [lb]	Yearly [tons]
P-42-88 Enclosed Steel Shot Blasting	VOC	-	-	-	-	-	-
	CO	-	-	-	-	-	-
	NO _x	-	-	-	-	-	-
	SO _x	-	-	-	-	-	-
	PM ₁₀	0.1	5	5	5	5	0.01
P-3-90 Coating Operation: Wood Products	VOC	36.2	1,040	1,040	1,040	1,040	0.52
	CO	-	-	-	-	-	-
	NO _x	-	-	-	-	-	-
	SO _x	-	-	-	-	-	-
	PM ₁₀	-	-	-	-	-	-

P-35-92 Wood working Operation	VOC	-	-	-	-	-	-
	CO	-	-	-	-	-	-
	NO _x	-	-	-	-	-	-
	SO _x	-	-	-	-	-	-
	PM ₁₀	2.1	185	187	189	189	0.25
P-36-92 Wood working Operation	VOC	-	-	-	-	-	-
	CO	-	-	-	-	-	-
	NO _x	-	-	-	-	-	-
	SO _x	-	-	-	-	-	-
	PM ₁₀	2.3	185	187	189	189	0.28
P-27-95 Diesel Emergency Engine	VOC	2.1	25	25	25	25	0.01
	CO	4.7	56	56	56	56	0.03
	NO _x	21.6	259	259	259	259	0.13
	SO _x	0.3	4	4	4	4	Neg.
	PM ₁₀	1.5	18	18	18	18	0.01
P-28-95 Diesel Emergency Engine	VOC	2.1	25	25	25	25	0.01
	CO	4.7	56	56	56	56	0.03
	NO _x	21.6	259	259	259	259	0.13
	SO _x	0.3	4	4	4	4	Neg.
	PM ₁₀	1.5	18	18	18	18	0.01
P-29-95 Diesel Emergency Engine	VOC	2.1	25	25	25	25	0.01
	CO	4.7	56	56	56	56	0.03
	NO _x	21.6	259	259	259	259	0.13
	SO _x	0.3	4	4	4	4	Neg.
	PM ₁₀	1.5	18	18	18	18	0.01
P-30-95 Diesel Emergency Engine	VOC	2.1	25	25	25	25	0.01
	CO	4.7	56	56	56	56	0.03
	NO _x	21.6	259	259	259	259	0.13
	SO _x	0.3	4	4	4	4	Neg.
	PM ₁₀	1.5	18	18	18	18	0.01
P-31-95 Diesel Emergency Engine	VOC	1.8	21	21	21	21	0.01
	CO	4.1	49	49	49	49	0.02
	NO _x	18.8	225	225	225	225	0.11
	SO _x	0.3	3	3	3	3	Neg.
	PM ₁₀	1.3	16	16	16	16	0.01
P-133-95 Coating: Automotive and Metal	VOC	41.4	2,153	2,153	2,153	2,153	5.23
	CO	-	-	-	-	-	-
	NO _x	-	-	-	-	-	-
	SO _x	-	-	-	-	-	-
	PM ₁₀	5.88	306	306	306	306	0.71
P-167-95 Coating: Metal Parts and Products	VOC	12.6	819	819	819	819	0.46
	CO	-	-	-	-	-	-
	NO _x	-	-	-	-	-	-
	SO _x	-	-	-	-	-	-
	PM ₁₀	0.4	27	27	27	27	0.02
P-55-97 Dryers for Institutional Laundry Facility	VOC	0.4	34	34	34	34	0.06
	CO	1.5	135	135	135	135	0.23
	NO _x	7.1	643	643	643	643	1.11
	SO _x	Neg.	4	4	4	4	0.01
	PM ₁₀						

P-41-88(a1) Coating: Metal Parts and Products	VOC	230.8	1,089	1,076	1,131	1,085	2.14
	CO	4.3	344	348	351	351	0.70
	NO _x	5.2	409	414	418	418	0.83
	SO _x	Neg.	2	2	3	3	Neg.
	PM ₁₀	48.8	328	325	337	328	0.65
P-64-04 Diesel Emergency Engine	VOC	2.2	18	18	18	18	0.01
	CO	9.9	82	82	82	82	0.04
	NO _x	96.6	805	805	805	805	0.40
	SO _x	0.1	1	1	1	1	Neg.
	PM ₁₀	1.5	13	13	13	13	0.01
P-77-92(a) Letterpress and Silkscreen Printing	VOC	22.7	130	130	130	130	0.24
	CO	-	-	-	-	-	-
	NO _x	-	-	-	-	-	-
	SO _x	-	-	-	-	-	-
	PM ₁₀	-	-	-	-	-	-
P-22-04(a) Coating: Metal Parts and Products	VOC	115.7	595	606	637	637	1.24
	CO	3.0	272	275	278	278	0.55
	NO _x	3.6	324	328	331	331	0.66
	SO _x	Neg.	2	2	2	2	Neg.
	PM ₁₀	25.3	221	224	231	231	0.45
P-51-10 Diesel Emergency Engine	VOC	10.0	83	83	83	83	0.04
	CO	7.8	65	65	65	65	0.03
	NO _x	32.6	271	271	271	271	0.14
	SO _x	Neg.	Neg.	Neg.	Neg.	Neg.	Neg.
	PM ₁₀	1.9	16	16	16	16	0.01
P-53-88(a) Coating: Automotive	VOC	29.2	1,619	1,637	1,655	1,655	2.17
	CO	-	-	-	-	-	-
	NO _x	-	-	-	-	-	-
	SO _x	-	-	-	-	-	-
	PM ₁₀	2.3	210	213	215	215	0.28

[District Rule 3.4/P-42-88, P-3-90, P-35-92, P-36-92, P-27-95, P-28-95, P-29-95, P-30-95, P-31-95, P-133-95, P-167-95, P-55-97, C-02-142, C-02-360, C-06-64, C-07-176, C-08-258 and C-10-30]

Applicable Operating Requirements:

Process Limits for P-42-88 - Enclosed Steel Shot Blasting

The maximum usage of steel shot shall not exceed 25 pounds/day, 1,300 pounds/1st calendar quarter, 1,300 pounds/2nd calendar quarter, 1,300 pounds/3rd calendar quarter, 1,300 pounds/4th calendar quarter, and 2.50 tons/year. [District Rule 3.4/P-42-88]

Process Limits for P-3-90 - Coating Operation: Wood Products

The maximum application of coatings shall not exceed 3 gallons/day, 195 gallons/1st calendar quarter, 195 gallons/2nd calendar quarter, 195 gallons/3rd calendar quarter, 195 gallons/4th calendar quarter, and 300 gallons/year. [District Rule 3.4/P-3-90]

The maximum usage of solvent shall not exceed 5 gallons/day, 60 gallons/1st calendar quarter, 60 gallons/2nd calendar quarter, 60 gallons/3rd calendar quarter, 60 gallons/4th calendar quarter, and 60 gallons/year. [District Rule 3.4/P-3-90]

Condition for P-3-90 - Coating Operation: Wood Products

No spray painting operations shall occur without properly functioning filtration systems. Filters shall be changed at least on a weekly basis. A spare set of filters shall be available at all times. [District Rule 3.4/P-3-90]

Process Limits for P-35-92 - Woodworking operation

The maximum processing of raw lumber shall not exceed 500 board feet/day, 12,500 board feet/1st calendar quarter, 12,500 board feet/2nd calendar quarter, 12,500 board feet/3rd calendar quarter, 12,500 board feet/4th calendar quarter, and 12,500 board feet/year. [District Rule 3.4/P-35-92]

Process Limits for P-36-92 - Woodworking operation

The maximum processing of raw lumber shall not exceed 500 board feet/day, 12,500 board feet/1st calendar quarter, 12,500 board feet/2nd calendar quarter, 12,500 board feet/3rd calendar quarter, 12,500 board feet/4th calendar quarter, and 12,500 board feet/year. [District Rule 3.4/P-36-92]

Process Limits for P-27-95, P-28-95, P-29-95, and P-30-95 - Emergency Diesel Engines

The maximum diesel fuel consumption for maintenance and testing shall not exceed 46 gallons/day, 552 gallons/1st calendar quarter, 552 gallons/2nd calendar quarter, 552 gallons/3rd calendar quarter, 552 gallons/4th calendar quarter, and 552 gallons/year. [District Rule 3.4/P-27-95, P-28-95, P-29-95, and P-30-95]

Process Limits for P-31-95 - Emergency Diesel Engine

The maximum diesel fuel consumption for maintenance and testing shall not exceed 46 gallons/day, 552 gallons/1st calendar quarter, 552 gallons/2nd calendar quarter, 552 gallons/3rd calendar quarter, 552 gallons/4th calendar quarter, and 552 gallons/year. [District Rule 3.4/P-31-95]

Conditions for P-27-95, P-28-95, P-29-95, P-30-95 and P-31-95 - Emergency Diesel Engines

The Permit Holder shall not operate this internal combustion engine more than 1 hour per day and 12 hours per calendar year for maintenance and testing purposes, and such operation shall be scheduled in cooperation with the District so as to limit air quality impact. [District Rule 3.4/P-27-95, P-28-95, P-29-95, P-30-95 and P-31-95]

The Permit Holder shall not operate this internal combustion engine for the supplying of power to a serving utility for distribution on the grid. [District Rule 3.4/P-27-95, P-28-95, P-29-95, P-30-95 and P-31-95]

The Permit Holder's operation of this internal combustion engine for reasons other than maintenance purposes shall be limited to actual interruptions of electrical power by the serving utility. [District Rule 3.4/P-27-95, P-28-95, P-29-95, P-30-95 and P-31-95]

The Permit Holder shall maintain a log of the operation hours for this internal combustion engine identifying the type of usage (either maintenance or emergency), the duration and date of each usage. The log shall be retained for a period of five (5) years and be made available to District personnel upon request. [District Rule 3.4, §501/P-27-95, P-28-95, P-29-95, P-30-95 and P-31-95]

Process Limits for P-133-95 - Coating Operation: Automotive, Metal Parts and Products

The maximum application of coatings shall not exceed 12 gallons/day, 1,248 gallons/1st calendar quarter, 1,248 gallons/2nd calendar quarter, 1,248 gallons/3rd calendar quarter, 1,248 gallons/4th calendar quarter, and 4,992 gallons/year. [District Rule 3.4/P-133-95]

The maximum usage of solvent shall not exceed 5 gallons/day, 260 gallons/1st calendar quarter, 260 gallons/2nd calendar quarter, 260 gallons/3rd calendar quarter, 260 gallons/4th calendar quarter, and 1,040 gallons/year. [District Rule 3.4/P-133-95]

Process Limits for P-167-95 - Coating Operation: Metal Parts and Products

The maximum application of general coating shall not exceed 2 gallons/day, 130 gallons/1st calendar quarter, 130 gallons/2nd calendar quarter, 130 gallons/3rd calendar quarter, 130 gallons/4th calendar quarter, and 300 gallons/year. [District Rule 3.4/P-167-95]

The maximum application of high gloss coating shall not exceed 1 gallon/day, 65 gallons/1st calendar quarter, 65 gallons/2nd calendar quarter, 65 gallons/3rd calendar quarter, 65 gallons/4th calendar quarter, and 150 gallons/year. [District Rule 3.4/P-167-95]

The maximum usage of solvent shall not exceed 1 gallon/day, 65 gallons/1st calendar quarter, 65 gallons/2nd calendar quarter, 65 gallons/3rd calendar quarter, 65 gallons/4th calendar quarter, and 150 gallons/year. [District Rule 3.4/P-167-95]

Conditions for P-167-95 - Coating Operation: Metal Parts and Products

All painting shall be conducted in booth with filters in place and fan operating.
[District Rule 3.4/P-167-95]

The Permit Holder shall maintain records on a daily basis that include the coating and mix ratio of components in the coating used, the quantity of each coating applied, and corresponding VOC emissions. [District Rule 2.25, §501.1 and District Rule 3.4/P-167-95]

The Permit Holder shall maintain a daily log of solvent use. This log shall include the type, name, VOC content as applied, amount of solvent used for cleanup and surface preparation, and corresponding VOC emissions.[District Rule 2.31, §501 and District Rule 3.4/P-167-95]

Process Limits for P-55-97 - Dryers for an Institutional Laundry Facility

The maximum natural gas consumption rate shall not exceed 71,400 cubic feet/day, 6.43 million cubic feet/1st calendar quarter, 6.43 million cubic feet/2nd calendar quarter, 6.43 million cubic feet/3rd calendar quarter, 6.43 million cubic feet/4th calendar quarter, and 22.29 million cubic feet/year. [District Rule 3.4/P-55-97]

Process Limits for P-41-88(a1) - Metal Parts Coating Operation

The maximum application of general coating shall not exceed 100 gallons/day, 453 gallons/1st calendar quarter, 447 gallons/2nd calendar quarter, 471 gallons/3rd calendar quarter, 451 gallons/4th calendar quarter, and 1,782 gallons/year. [District Rule 3.4/C-02-142]

The maximum application of powder coating shall not exceed 50 pounds/day, 2,490 pounds/1st calendar quarter, 2,495 pounds/2nd calendar quarter, 2,508 pounds/3rd calendar quarter, 2,508 pounds/4th calendar quarter, and 10,000 pounds/year. [District Rule 3.4/C-02-142]

The maximum natural gas consumption rate shall not exceed 0.0516 million cubic feet/day, 4.090 million cubic feet/1st calendar quarter, 4.140 million cubic feet/2nd calendar quarter, 4.180 million cubic feet/3rd calendar quarter, 4.180 million cubic feet/4th calendar quarter, and 16.590 million cubic feet/year. [District Rule 3.4/C-02-142]

Conditions for P-41-88(a1) - Metal Parts Coating Operation

A non-resettable, totalizing gaseous fuel flow meter shall be utilized to measure the quantity (in cubic feet) of natural gas combusted by the equipment of permits P-41-88(a1) and P-22-04. [District Rule 3.4/C-02-142]

The combined natural gas usage of the equipment of P-41-88(a1) and P-22-04 shall not exceed the quarterly and yearly limits listed in this permit's Permitted Process Limits. [District Rule 3.4/C-02-142]

All liquid coatings shall be applied in the liquid paint booth with filters in place and exhaust fans operating. [District Rule 3.4/C-02-142]

The Permit Holder shall not release or discharge into the atmosphere from the liquid booth exhaust, particulate matter in excess of 0.007 grains per cubic feet of exhaust. [District Rule 3.4/C-02-142]

The Permit Holder shall not release or discharge into the atmosphere from the powder booth exhaust, particulate matter in excess of 0.007 grains per cubic feet of exhaust. [District Rule 3.4/C-02-142]

All powder coatings shall be applied in the powder paint booth with the filters in place, the electrostatic system and the exhaust fans operating. [District Rule 3.4/C-02-142]

The Permit Holder shall not apply to metal parts and products any powder coatings which contain VOC in excess of 0.01 pounds per pound of powder coating. [District Rule 3.4/C-02-142]

The Permit Holder shall not use any VOC-containing solvent material for the preparation or cleanup of surfaces, the cleaning of spray equipment, or the removal of paint. [District Rule 3.4/C-02-142]

The Permit Holder shall store all liquid coatings in closed containers when not in use. [District Rule 3.4/C-02-142]

The Permit Holder shall use closed containers for the disposal of cloth, paper, or other materials impregnated with VOC-containing materials. [District Rule 3.4/C-02-142]

The Permit Holder shall maintain a quarterly log of natural gas usage. [District Rule 3.4/C-02-142]

Process Limits for P-64-04 - Emergency Diesel Engine

The maximum diesel fuel consumption shall not exceed 418 gallons/day, 3,480 gallons/1st calendar quarter, 3,480 gallons/2nd calendar quarter, 3,480 gallons/3rd calendar quarter, 3,480 gallons/4th calendar quarter, and 3,480 gallons/year. [District Rule 3.4/C-02-360]

Conditions for P-64-04 - Emergency Diesel Engine

The Permit Holder shall not operate this internal combustion engine more than 50 hours per calendar year for maintenance and testing purposes, and such operation shall be scheduled in cooperation with the District so as to limit air quality impact. [District Rule 3.4, §110.1/C-02-360]

The Permit Holder shall not operate this internal combustion engine more than 200 hours per calendar year. [District Rule 3.4, §110.2/C-02-360]

The Permit Holder shall not operate this internal combustion engine for the supplying of power to a serving utility for distribution on the grid. [District Rule 3.4, §110.3/C-02-360]

The Permit Holder's operation of this internal combustion engine for reasons other than maintenance purposes shall be limited to actual interruptions of electrical power by the serving utility. [District Rule 3.4, §110.4/C-02-360]

The Permit Holder shall maintain a log of the operation hours for this internal combustion engine identifying the type of usage (either maintenance or emergency), the duration and date of each usage. The log shall be retained for a period of five (5) years and be made available to District personnel upon request. [District Rule 3.4, §501/C-02-360]

Process Limits for P-77-92(a) - Letterpress and Silkscreen Printing Operation

The maximum application of letter press ink shall not exceed 22.5 pounds/day, 570.0 pounds/1st calendar quarter, 570.0 pounds/2nd calendar quarter, 570.0 pounds/3rd calendar quarter, 570.0 pounds/4th calendar quarter, and 2,000.0 pounds/year. [District Rule 3.4/C-06-64]

The maximum application of high-VOC silkscreen ink shall not exceed 1.0 pounds/day, 1.0 pounds/1st calendar quarter, 1.0 pounds/2nd calendar quarter, 1.0 pounds/3rd calendar quarter, 1.0 pounds/4th calendar quarter, and 4.0 pounds/year. [District Rule 3.4/C-06-64]

The maximum application of medium-VOC silkscreen ink shall not exceed 10.0 pounds/day, 10.0 pounds/1st calendar quarter, 10.0 pounds/2nd calendar quarter, 10.0 pounds/3rd calendar quarter, 10.0 pounds/4th calendar quarter, and 40.0 pounds/year. [District Rule 3.4/C-06-64]

The maximum application of low-VOC silkscreen ink shall not exceed 50.0 pounds/day, 50.0 pounds/1st calendar quarter, 50.0 pounds/2nd calendar quarter, 50.0 pounds/3rd calendar quarter, 50.0 pounds/4th calendar quarter, and 200.0 pounds/year. [District Rule 3.4/C-06-64]

The maximum application of adhesive shall not exceed 0.5 gallons/day, 1.0 gallons/1st calendar quarter, 1.0 gallons/2nd calendar quarter, 1.0 gallons/3rd calendar quarter, 1.0 gallons/4th calendar quarter, and 2.0 gallons/year. [District Rule 3.4/C-06-64]

The maximum application of surface preparation and equipment cleanup solvents shall not exceed 1.33 gallons/day, 16.5 gallons/1st calendar quarter, 16.5

gallons/2nd calendar quarter, 16.5 gallons/3rd calendar quarter, 16.5 gallons/4th calendar quarter, and 61.0 gallons/year. [District Rule 3.4/C-06-64]

Conditions for P-77-92(a) - Letterpress and Silkscreen Printing Operation

The maximum as-applied VOC-content (excluding water and exempt compounds) of letterpress inks shall not exceed 300 g/L (2.5 lb/gallon). [District Rule 3.4/C-06-64]

The maximum as-applied VOC-content (excluding water and exempt compounds) of the high-VOC silkscreening inks shall not exceed 840 g/L (7.0 lb/gallon). [District Rule 3.4/C-06-64]

The maximum as-applied VOC-content (excluding water and exempt compounds) of the medium-VOC silkscreening inks shall not exceed 540 g/L (4.5 lb/gallon). [District Rule 3.4/C-06-64]

The maximum as-applied VOC-content (excluding water and exempt compounds) of the low-VOC silkscreening inks shall not exceed 120 g/L (1.0 lb/gallon). [District Rule 3.4/C-06-64]

The maximum as-applied VOC-content (excluding water and exempt compounds) of adhesives used in the printing operation shall not exceed 660 g/L (5.50 lb/gallon). [District Rule 3.4/C-06-64]

The maximum as-applied VOC-content of solvents used to clean ink or adhesive application equipment shall not exceed 800 g/L (6.67 lb/gallon) and a composite pressure of 33 mm Hg at 20 degrees Celsius. [District Rule 3.4/C-06-64]

The Permit Holder shall store all VOC-containing materials (including shop rags and towels) used in the printing operation, regardless of their VOC-content, 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-06-64]

The Permit Holder shall maintain a current list of all inks, ink additives, adhesives, and solvents used in the printing operation. The list shall include the VOC-content, and where applicable, vapor pressure of each material. [District Rule 3.4/C-06-64]

The Permit Holder shall on a monthly basis record the type, the amount, and the as-applied VOC-content of each ink and adhesive used in the printing operation. [District Rule 3.4/C-06-64]

The Permit Holder shall on a monthly basis record the type, the amount, and the as-applied VOC-content of each solvent used in the printing operation. [District Rule 3.4/C-06-64]

Process Limits for P-22-04(a) - Coating Operation: Metal Parts and Products

The maximum emission of VOCs from the coating process shall not exceed 115.0 pounds/day, 552 pounds/1st calendar quarter, 564 pounds/2nd calendar quarter, 593 pounds/3rd calendar quarter, 593 pounds/4th calendar quarter, and 2,300 pounds/year. [District Rule 3.4/C-07-176]

The maximum application of powder coating shall not exceed 50 pounds/day, 2,490 pounds/1st calendar quarter, 2,495 pounds/2nd calendar quarter, 2,508 pounds/3rd calendar quarter, 2,508 pounds/4th calendar quarter, and 10,000 pounds/year. [District Rule 3.4/C-07-176]

The maximum natural gas consumption rate shall not exceed 0.036 million cubic feet/day, 3.240 million cubic feet/1st calendar quarter, 3.276 million cubic feet/2nd calendar quarter, 3.312 million cubic feet/3rd calendar quarter, 3.312 million cubic feet/4th calendar quarter, and 13.140 million cubic feet/year. [District Rule 3.4/C-07-176]

Conditions for P-22-04(a) - Coating Operation: Metal Parts and Products

A non-resettable, totalizing gaseous fuel flow meter shall be utilized to measure the quantity (in cubic feet) of natural gas combusted by the equipment of permits P-41-88(a1) and P-22-04(a). [District Rule 3.4/C-07-176]

The combined natural gas usage of the equipment of P-41-88(a1) and P-22-04(a) shall not exceed 4.090 million cubic feet in the 1st calendar quarter, 4.140 million cubic feet in the 2nd calendar quarter, 4.180 million cubic feet in the 3rd calendar quarter, 4.180 million cubic feet in the 4th calendar quarter, and 16.590 million cubic feet in the calendar year. [District Rule 3.4/C-07-176]

All liquid coatings shall be applied in the liquid paint booth with filters in place and exhaust fans operating. [District Rule 3.4/C-07-176]

All powder coatings shall be applied in the powder paint booth with the filters in place, the electrostatic system and the exhaust fans operating. [District Rule 3.4/C-07-176]

The Permit Holder shall not release or discharge into the atmosphere from the liquid booth exhaust, particulate matter in excess of 0.03 grains per cubic feet of exhaust. [District Rule 3.4/C-07-176]

The Permit Holder shall not release or discharge into the atmosphere from the powder booth exhaust, particulate matter in excess of 0.02 grains per cubic feet of exhaust. [District Rule 3.4/C-07-176]

The Permit Holder shall not apply to metal parts and products any powder coatings which contain VOC in excess of 0.01 pounds per pound of powder coating. [District Rule 3.4/C-07-176]

The Permit Holder shall not use any VOC-containing solvent material for the preparation or cleanup of surfaces, the cleaning of spray equipment, or the removal of paint. [District Rule 3.4/C-07-176]

The Permit Holder shall store all liquid coatings in closed containers when not in use. [District Rule 3.4/C-07-176]

The Permit Holder shall use closed containers for the disposal of cloth, paper, or other materials impregnated with VOC-containing materials. [District Rule 3.4/C-07-176]

The Permit Holder shall maintain a quarterly log of natural gas usage. [District Rule 3.4/C-07-176]

Process Limits for P-51-10 - Emergency Diesel Engine

The maximum diesel fuel consumption shall not exceed 207 gallons/day, 1,724 gallons/1st calendar quarter, 1,724 gallons/2nd calendar quarter, 1,724 gallons/3rd calendar quarter, 1,724 gallons/4th calendar quarter, and 1,724 gallons/year. [District Rule 3.4/C-8-258]

Conditions for P-51-10 - Emergency Diesel Engine

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 (1) hour which is:

- a. As dark or darker in shade than No. 1 on the Ringelmann Chart; or
- b. Greater than 20% opacity. [District Rule 3.4/C-08-258]

The Permit Holder shall not operate the IC engine more than 50 hours per calendar year for maintenance and testing purposes, and such operation shall be scheduled in cooperation with the District so as to limit air quality impact. [District Rule 3.4, §110.1 and Title 17 CCR, Section 93115.6(a)(3)(A)(1.)/C-08-258]

The Permit Holder shall not operate the IC engine more than 200 hours per calendar year. [District Rule 3.4, §110.2/C-08-258]

The Permit Holder shall not operate the IC engine for the supplying of power to a serving utility for distribution on the grid. [District Rule 3.4, §110.3/C-08-258]

The Permit Holder's operation of the IC engine for reasons other than maintenance and testing purposes shall be limited to actual interruptions of electrical power by the serving utility. [District Rule 3.4, §110.4/C-08-258]

The Permit Holder shall maintain a monthly log of usage that shall list and document the nature of use for each of the following:

- a. Emergency use hours of operation;
- b. Maintenance and testing hours of operation;

- c. Hours of operation for emission testing to show compliance with Title 17 CCR, Section 93115.6(a)(3) and 93115.6(b)(3);
- d. Initial start-up hours;
- e. Fuel use through the retention of fuel purchase records which indicate that the fuel used in the IC engine is CARB certified diesel fuel or an approved ATCM compliant alternative fuel. [District Rule 3.4 and Title 17 CCR, Section 93115.10(g)(1)/C-08-258]

The Permit Holder shall retain the log for a minimum of sixty (60) months from the date of entry. Log entries made within twenty-four (24) months of the most recent entry shall be retained on-site and made immediately available to the District staff upon request. Log entries made from twenty-five (25) to sixty (60) months from most recent entry shall be made available to District staff within five (5) working days from request. [District Rule 3.4 and Title 17 CCR, Section 93115.10(g)(2)/C-08-258]

The Permit Holder shall not operate the engine within one-hundred thirty-five (135) feet of the nearest shoulder of Peabody Road. [District Rule 3.4/C-08-258]

Process Limits for P-53-88(a) - Coating Operation: Automotive

The maximum emission of VOCs from the coating process shall not exceed 29.2 pounds/day, 1,619 pounds/1st calendar quarter, 1,637 pounds/2nd calendar quarter, 1,655 pounds/3rd calendar quarter, 1,655 pounds/4th calendar quarter, and 4,348 pounds/year. [District Rule 3.4/C-10-30]

Conditions for P-53-88(a) - Coating Operation: Automotive

All painting shall be conducted in booth with filters in place, fan operating, and doors closed. [District Rule 3.4/C-10-30]

The Permit Holder shall not release or discharge into the atmosphere, particulate matter in excess of 0.001 grains per cubic foot of exhaust volume as calculated at standard conditions. [District Rule 3.4/C-10-30]

The Permit Holder shall not discharge into the atmosphere 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 than No. 1 on the Ringelmann Chart; or
- b. Greater than 20% opacity. [District Rule 2.3 and District Rule 3.4/C-10-30]

The Permit Holder shall not apply to any motor vehicle, mobile equipment, or associated parts and components, any coating with a VOC regulatory content (less water and exempt compounds) in excess of the following limits:

COATING TYPE	REGULATORY VOC CONTENT
Adhesion Promoter	540 g/l (4.5 lb/gal)
Clear Coating	250 g/l (2.1 lb/gal)
Color Coating	420 g/l (3.5 lb/gal)

Multi-Color Coating	680 g/l (5.7 lb/gal)
Pretreatment Coating	660 g/l (5.5 lb/gal)
Primer	250 g/l (2.1 lb/gal)
Primer Sealer	250 g/l (2.1 lb/gal)
Single-Stage Coating	340 g/l (2.8 lb/gal)
Temporary Protective Coating	60 g/l (0.5 lb/gal)
Truck Bed Liner Coating	310 g/l (2.6 lb/gal)
Underbody Coating	430 g/l (3.6 lb/gal)
Uniform Finish Coating	540 g/l (4.5 lb/gal)
Any Other Coating Type	250 g/l (2.1 lb/gal)

[District Rule 2.26, §302 and District Rule 3.4/C-10-30]

If anywhere on the container of any automotive coating, or any label or sticker affixed to the container, or in any sales, advertising, or technical literature, any representation is made that indicates that the coating meets the definition of or is recommended for use for more than one of the coating categories listed above, then the lowest VOC content limit shall apply. [District Rule 2.26, §303 and District Rule 3.4/C-10-30]

The Permit Holder shall not apply any coating to any motor vehicle, mobile equipment, or associated parts and components by any method other than high volume low pressure (HVLP) spray equipment, unless such equipment has written approval from the District. [District Rule 2.26, §304 and District Rule 3.4/C-10-30]

The Permit Holder shall not use or possess any automotive coatings containing hexavalent chromium or cadmium. [District Rule 2.26, §308 and California Code of Regulations, Title 17, §93112 and District Rule 3.4/C-10-30]

Until January 1, 2011, the maximum VOC content of solvents used for product cleaning, and the cleaning of coating equipment shall not exceed 50 g/l (0.42 lb/gallon). [District Rule 2.31, §301 and District Rule 3.4/C-10-30]

Effective January 1, 2011, the maximum VOC content of solvents used for product cleaning, and the cleaning of coating equipment shall not exceed 25 g/l (0.21 lb/gallon). [District Rule 2.31, §301 and District Rule 3.4/C-10-30]

The Permit Holder shall only use the following methods to apply solvents with a VOC-content greater than 25 g/l (0.21 lb/gallon) process used for surface preparation:

- a. Wipe Cleaning;
- b. Spray bottles or containers with a maximum capacity of 16 fluid ounces from which solvents are applied without a propellant-induced force; or
- c. Any other method approved by the District. [District Rule 3.4 and District Rule 2.31, §302/C-10-30]

The Permit Holder shall not use VOC containing materials with a VOC content greater than 25 g/l (0.21 lb/gallon) for the cleanup of coating equipment unless:

- a. The system must fully enclose the spray guns, cups, nozzles, bowls, and other parts during washing, rinsing and draining procedures;
- b. The system must be used according to the manufacturer's recommendations; and
- c. The system must be closed when not in use. [District Rule 3.4 and District Rule 2.31, §301 and §306/C-10-30]

The Permit Holder shall use closed containers for the storage or disposal of cloth, paper, or other VOC containing materials (including paint, thinners, catalysts, reducers, solvent and spent solvent used for surface preparation, clean-up, and coating applications). [District Rule 2.26, §306, District Rule 2.31, §308, and District Rule 3.4/C-10-30]

The Permit Holder shall maintain a current list that includes the following for all VOC containing materials:

- a. Material name and manufacturer's product data sheet or material safety data sheet (MSDS);
- b. Material application method;
- c. Material category and specific mix ratio;
- d. Actual VOC content (in g/l or lb/gallon); and
- e. As-applied regulatory VOC content (in g/l or lb/gallon). [District Rule 2.26, §501.1-501.2, District Rule 2.31, §501.1-501.3, and District Rule 3.4/C-10-30]

The Permit Holder shall maintain records on a daily basis that include the coatings used, the quantity and mix ratio of each coating applied, and the corresponding VOC emissions. [District Rule 2.26, §501.3 and District Rule 3.4/C-10-30]

The Permit Holder shall maintain records on a monthly basis that include the solvents used, the quantity and mix ratio of each solvent applied, and the corresponding VOC emissions. [District Rule 2.31, §501.2 and District Rule 3.4/C-10-30]

The Permit Holder shall maintain purchase records identifying the type, name, and volume of each VOC containing material, and any other records necessary to demonstrate compliance with this permit. [District Rule 2.26, §501.4, District Rule 2.31, §501.4, and District Rule 3.4/C-10-30]

All required records shall be retained for a minimum of five (5) years and shall be made available for District inspection upon request. [District Rule 3.4/C-10-30]

RULE 3.8 Federal Operating Permits

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 source has previously operated in compliance with the requirements of this rule and the source has submitted a complete Title V application for renewal of the permit. The Title V permit renewal will also incorporate changes that have been approved in ATC C-10-30. ATC C-10-30 proposed to modify the automotive coating operation of P-53-88 to allow application of additional coating and change the permitted process limits from volume of coatings applied to weight of VOCs from coatings applied.

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. [District Rule 3.8, §302.10]

Compliance with Permit Conditions:

The Permit Holder shall comply with all Title V permit conditions. [District Rule 3.8, §302.11a]

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

The Permit Holder 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. [District Rule 3.8, §302.11d]

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

Within a reasonable time period, the Permit Holder 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. [District 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. [District 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 is issued (TBD, 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 Rule 3.8. [District Rule 3.8, §302.14(b)]

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, §302.14(c)]

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, §302.14(d)]

Permit Life:

The Title V permit shall expire five (5) 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. [District 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. [District 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. [District 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. [District 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. [District 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. [District 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. [District Rule 3.8, §413.1]

Monitoring, Testing and Analysis:

The source is not subject to any monitoring, testing, or analysis requirements pursuant to any federal regulation. No monitoring, testing, or analysis requirements will be placed on the permit.

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, §302.6(a)]

The permit holder shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of sample collection, measurement, report, or application. [District Rule 3.8, §302.6(b)]

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 ten (10) days after detection.[District Rule 3.8, §302.7(a)]

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."

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 is issued (TBD), 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, §302.7(c)]

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, §302.7(e)]

**40 CFR Part 60, Subpart IIII - Standards of Performance for Stationary
Compression Ignition Internal Combustion Engines**

Rule Description

This regulation establishes emissions limits for stationary diesel engines. The provisions of this subpart apply to manufacturers of certain stationary compression ignition engines and to owners/operators of certain engines. For owners and operators of stationary compression ignition engines that commence construction after July 11, 2005, the provisions of this subpart apply if the engines are: manufactured after April 1, 2006 and are not fire pump engines, or manufactured as

a certified National Fire Protection Association (NFPA) fire pump engines after July 1, 2006. The provisions of this subpart also apply to owners and operators of stationary compression ignition engines that modify or reconstruct their stationary compression ignition engines after July 11, 2005.

Compliance Status

The provisions of Sections 60.4205 through 60.4209 and Sections 60.4211 and 60.4214 of the subpart are applicable to the emergency stationary compression ignition engine of P-51-10 since the engine is not a fire pump engine and was constructed after April 1, 2006. The source is currently in compliance with this subpart.

Permit Conditions

The engine must not emit more than 6.9 g/HP-hr of nitrogen oxides. [40 CFR Part 60, Section 60.4205 (Subpart III)]

The engine must be operated and maintained according to the manufacturer's written instructions or procedures developed by the owner or operator that are approved by the engine manufacturer, over the entire life of the engine. [40 CFR Part 60, Section 60.4206 (Subpart III)]

The engine must use diesel fuel that meets the requirements of 40 CFR 80.510(b). [40 CFR Part 60, Section 60.4207 (Subpart III)]

The engine of must be equipped with a non-resettable hour meter. [40 CFR Part 60, Section 60.4209 (Subpart III)]

40 CFR Part 63, Subpart ZZZZ - National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

Rule Description

This subpart establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions.

Compliance Status

The facility is subject to the requirements of this regulations because the facility is an area source of HAP and operates stationary internal combustion engines. The necessary conditions will be added to the permit to ensure compliance with the regulation.

Permit Conditions

At all times the engines, including associated air pollution control equipment and monitoring equipment, must be operated and maintained in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [40 CFR Part 63, Section 60.6605 (Subpart ZZZZ)]

The Permit Holder must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR Part 63, Section 63.6625(h) (Subpart ZZZZ)]

For P-27-95, P-28-95, P-29-95, P-30-95, P-31-95, and P-64-04, the oil and oil filter shall be changed after every 500 hours of operation, or annually, whichever comes first. [40 CFR Part 63, Section 63.6603 (Subpart ZZZZ)]

For P-27-95, P-28-95, P-29-95, P-30-95, P-31-95, and P-64-04, air cleaners shall be inspected after every 1,000 hours of operation, or annually, whichever comes first. [40 CFR Part 63, Section 63.6603 (Subpart ZZZZ)]

For P-27-95, P-28-95, P-29-95, P-30-95, P-31-95, and P-64-04, all hoses and belts shall be inspected after every 1,000 hours of operation, or annually, whichever comes first. [40 CFR Part 63, Section 63.6603 (Subpart ZZZZ)]

40 CFR Part 63, Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters

Rule Description

This subpart establishes national emission limits and work practice standards for hazardous air pollutants emitted from industrial, commercial, and institutional boilers and process heaters. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limits and work practice standards.

Compliance Status

Because the facility does not emit more than 10 tons of a single HAP or 25 tons of any combination of HAPs, the facilities engines are not considered a major source of HAPs. As such, the facility dryers are not subject to the standard.

40 CFR Part 63, Subpart HHHHHH - National Emission Standards for Hazardous Air Pollutants for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

Rule Description

This subpart establishes national emission standards for hazardous air pollutants from area sources involved in: paint stripping operations that involve the use of chemical strippers that contain methylene chloride, autobody refinishing operations that encompass motor vehicle and mobile equipment spray-applied surface coating operations, and spray application of coatings containing compounds of chromium, lead, manganese, nickel, or cadmium to any part or product made of metal or plastic, or combinations of metal and plastic that are not motor vehicles or mobile equipment.

Compliance Status

This subpart does not apply to sources of HAP that are located at a major source. Because the facility is a major source, the paint stripping and coating application activities at the facility are not subject to the standard.

40 CFR Part 64 - Compliance Assurance Monitoring

Rule Description

This subpart provides guidelines for developing a compliance assurance monitoring (CAM) plan. The CAM plan requires that a facility monitor the appropriate parameters of a process or its control equipment, and/or measure the process' actual emissions, so as to ensure emission compliance on an ongoing basis.

The CAM requirements apply to any pollutant specific emissions unit at a major source that is required to obtain a Part 70 permit and which satisfies all the following:

- a. The unit is subject to an emission limit or standard for an applicable regulated air pollutant;
- b. The unit uses a control device to achieve compliance with any such emission limitation or standard; and
- c. The unit's pre-control device potential to emit of an applicable regulated pollutant is greater than or equal to that pollutant's major source threshold.

Compliance Status

The source is exempt from the requirements of this federal subpart, since no emissions unit has a pre-control device potential to emit of an applicable regulated pollutant that is greater than or equal to that pollutant's major source threshold.

Permit Condition

The permit does not require a CAM specific condition.