



MAY 25 2010

Mr. Scott Moffet  
Excel Storage Products  
213 Kelly Street  
Lodi, CA 95240

**Re: Final - Authority to Construct / Certificate of Conformity (Minor Mod)  
Project # N-1093677**

Dear Mr. Moffet:

The Air Pollution Control Officer has issued Authorities to Construct (N-1002-2-9 and N-1002-4-4) with Certificates of Conformity to Excel Storage Products. The applicant is proposing to receive Authorities to Construct to increase the powder coating material throughput of unit N-1002-4 and is proposing to decrease the potential to emit of the liquid coating equipment operating under permit N-1002-2

Enclosed are the Authorities to Construct and invoice. The application and proposal were sent to US EPA Region IX on March 15, 2010. No comments were received following the District's preliminary decision on this project.

Prior to operating with modifications authorized by the Authorities to Construct, you must submit an application to modify the Title V permit as an administrative amendment in accordance with District Rule 2520, Section 11.5.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Rupi Gill, Permit Services Manager, at (209) 557-6400.

Sincerely,

David Warner  
Director of Permit Services

DW: MJS/cm

Enclosures

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

**Northern Region**  
4800 Enterprise Way  
Modesto, CA 95356-8718  
Tel: (209) 557-6400 FAX: (209) 557-6475

**Central Region (Main Office)**  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
Tel: (559) 230-8000 FAX: (559) 230-6061

**Southern Region**  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
Tel: 661-392-5500 FAX: 661-392-5585



MAY 25 2010

Gerardo C. Rios, Chief  
Permits Office  
Air Division  
U.S. EPA - Region IX  
75 Hawthorne St  
San Francisco, CA 94105

**Re: Final - Authority to Construct / Certificate of Conformity (Minor Mod)  
Project # N-1093677**

Dear Mr. Rios:

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Enclosed are copies of the Authorities to Construct. The application and proposal were sent to US EPA Region IX on March 15, 2010. No comments were received following the District's preliminary decision on this project.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Rupi Gill, Permit Services Manager, at (209) 557-6400.

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Tel: 661-392-5500 FAX: 661-392-5585



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** N-1002-2-9

**ISSUANCE DATE:** 05/13/2010

**LEGAL OWNER OR OPERATOR:** EXCEL STORAGE PRODUCTS LP

**MAILING ADDRESS:** 213 KELLY ST  
LODI, CA 95240

**LOCATION:** 214 KELLY ST  
LODI, CA 95240

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF A METAL PARTS AND PRODUCTS COATING OPERATION TO LIMIT THE ANNUAL VOC EMISSIONS TO 50,200 LB SUCH THAT THE EQUIPMENT DESCRIPTION BECOMES: METAL PARTS & PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN(S), SPRAY PAINT BOOTH WITH EXHAUST FILTERS AND A 1.2 MMBTU/HR NATURAL GAS-FIRED CURING OVEN.

### CONDITIONS

1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2520] Federally Enforceable Through Title V Permit
2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule] Federally Enforceable Through Title V Permit
3. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
5. The particulate matter emissions from the stack of the paint spray booth shall not exceed 0.1 gr/scf. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Exhaust fans shall be switched on prior to the start of paint spraying operations. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT.** This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of Issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Saefedin, Executive Director / APCO

DAVID WARNER, Director of Permit Services

N-1002-2-9 : May 13 2010 1:32PM - SCHONHOM : Joint Inspection NOT Required

7. The exhaust filters shall be properly maintained and shall be in place during the painting operation. [District Rule 4102] Federally Enforceable Through Title V Permit
8. The total VOC emissions rate shall not exceed 276.0 lb/day and 50,200 lb/year. A year for the purposes of this condition is any rolling 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The total PM10 emissions rate shall not exceed 97.1 lb/day and 17,690 lb/year. A year for the purposes of this condition is any rolling 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The VOC emission rate shall not exceed 15,912 lb during the first quarter, 16,089 lb during the second quarter, 16,266 lb during the third quarter, nor 16,266 lb during the fourth quarter. [District NSR Rule and 40 CFR Part 64] Federally Enforceable Through Title V Permit
11. Emissions from the natural gas-fired curing oven shall not exceed any of the following: 0.1 lb-NO<sub>x</sub>/MMBtu, 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM10/MMBtu, 0.084 lb-CO/MMBtu, and 0.0055 lb-VOC/MMBtu [District Rule 2201] Federally Enforceable Through Title V Permit
12. VOC content the coatings as applied, excluding water and exempt compounds, shall not exceed any of the following, except as allowed elsewhere in this permit: baked coating 275 g/l (2.3 lb/gal), air-dried coating: 340 g/l (2.8 lb/gal), air-dried dip coating of steel joists with coating viscosity, as applied, of more than 45.6 centistokes at 78 °F or an average dry-film thickness of greater than 2.0 millimeters: 340 g/l (2.8 lb/gal), air-dried dip coating of steel joists with coating viscosity, as applied, of less than or equal to 45.6 centistokes at 78 °F or an average dry-film thickness of less than or equal to 2.0 millimeters: 400 g/l (3.32 lb/gal). [District Rule 4603, 5.1; 40 CFR 60 Subpart EE and 40 CFR Part 64] Federally Enforceable Through Title V Permit
13. VOC content of baked specialty coatings as applied, excluding water and exempt compounds, shall not exceed any of the following: camouflage 360 g/l (3.0 lb/gal), extreme performance: 420 g/l (3.5 lb/gal) through 12/31/2010 and 360 g/l (3.0 lb/gal) on and after 1/1/2011, heat resistant: 360 g/l (3.0 lb/gal), extreme high gloss: 360 g/l (3.0 lb/gal), high performance architectural: 420 g/l (3.5 lb/gal), high temperature: 420 g/l (3.5 lb/gal), metallic topcoat: 360 g/l (3.0 lb/gal), pretreatment coating: 420 g/l (3.5 lb/gal), silicone release: 420 g/l (3.5 lb/gal), solar absorbent: 360 g/l (3.0 lb/gal), and solid film lubricant: 880 g/l (7.3 lb/gal). [District Rule 4603, 5.2; 40 CFR 60 Subpart EE and 40 CFR Part 64] Federally Enforceable Through Title V Permit
14. VOC content of air-dried specialty coatings as applied, excluding water and exempt compounds, shall not exceed any of the following: camouflage 420 g/l (3.5 lb/gal), extreme performance: 420 g/l (3.5 lb/gal), heat resistant: 420 g/l (3.5 lb/gal), extreme high gloss: 420 g/l (3.5 lb/gal), high performance architectural: 420 g/l (3.5 lb/gal), high temperature: 420 g/l (3.5 lb/gal), metallic topcoat: 420 g/l (3.5 lb/gal), pretreatment coating: 420 g/l (3.5 lb/gal), silicone release: 420 g/l (3.5 lb/gal), solar absorbent: 420 g/l (3.5 lb/gal), and solid film lubricant: 880 g/l (7.3 lb/gal). [District Rule 4603, 5.2; 40 CFR 60 Subpart EE and 40 CFR Part 64] Federally Enforceable Through Title V Permit
15. Only HVLP, electrostatic, electrodeposition, flow, roll, dip, brush or continuous coating application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4603, 5.12 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
16. Permittee shall demonstrate that HVLP guns manufactured prior to 1/1/96 operate between 0.1 and 10 psig air atomizing pressure, by manufacturer's published technical material or by use of a certified air pressure tip gauge. [District Rule 4603, 5.12.3] Federally Enforceable Through Title V Permit
17. VOC content of solvents used for product cleaning during manufacturing process or surface preparation for coating application, repair and maintenance cleaning, and cleaning of coating application equipment shall not exceed 25 g/l (0.21 lb/gal). [District Rule 4603] Federally Enforceable Through Title V Permit
18. All fresh or spent coatings, adhesives, catalysts, thinners and solvents shall be stored in closed containers. Solvent laden cloth or paper shall be stored and disposed in closed non-absorbent containers. [District Rule 4603] Federally Enforceable Through Title V Permit
19. Each container or accompanying data sheet of any coating shall display the maximum VOC content of the coating, as applied, and after any thinning recommended by the manufacturer. The VOC content shall be displayed as grams of VOC per liter of coating (less water and exempt compounds). Each container or accompanying data sheet shall display a statement of the manufacturer's recommendation regarding thinning of the coating. [District Rule 4603, 6.1] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

20. VOC content of any coating shall be determined through the use of either product formulation data or analyzed by EPA Method 24 on an annual basis. [District Rule 4603, 6.3; 40 CFR 60 Subpart EE] Federally Enforceable Through Title V Permit
21. The permittee shall maintain a record of the daily VOC and PM10 emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
22. The permittee shall maintain a record of the cumulative annual VOC and PM10 emissions. The record shall be updated at least once during each week that the equipment operates. An annual period, for the purposes of this condition, is any rolling 12-month period. [District Rule 2201]
23. The permittee shall maintain a record of the quarterly VOC emissions from this equipment. The record shall be updated at least once during each week that the equipment operates, [District Rule]
24. The permittee shall maintain daily records of the following: quantity and type of coatings and solvents used, mix ratios by volume of components added to each coating applied, volume of coatings applied, VOC content of each coating as applied, and VOC content of each solvent. [District Rule 4603, 6.2; 40 CFR 60 Subpart EE and 40 CFR Part 64] Federally Enforceable Through Title V Permit
25. Permittee shall keep the following records for solvent cleaning activities: manufacturers product data sheet or MSDS of solvents used, VOC content of solvents in g/l or lb/gal, and the quantity of cleanup solvents used. [District Rule 4603, 6.1 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
26. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4603] Federally Enforceable Through Title V Permit
27. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable District requirements: Rule 4102 (12/17/92); Rule 4201(12/17/92); Rule 4603 (12/20/01); and 40 CFR 60, Subpart EE. The requirements for District Rule 4603 are more stringent than 40 CFR Part 60, Subpart EE and satisfy all its requirements. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit



## AUTHORITY TO CONSTRUCT

**PERMIT NO:** N-1002-4-4

**ISSUANCE DATE:** 05/13/2010

**LEGAL OWNER OR OPERATOR:** EXCEL STORAGE PRODUCTS LP

**MAILING ADDRESS:** 213 KELLY ST  
LODI, CA 95240

**LOCATION:** 214 KELLY ST  
LODI, CA 95240

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF A POWDER COATING OPERATION TO REMOVE A MANUAL POWDER COATING BOOTH FROM THE EQUIPMENT DESCRIPTION AND DERATE THE 5.4 MMBTU/HR CURING OVEN TO 4.9 MMBTU/HR SUCH THAT THE EQUIPMENT DESCRIPTION BECOMES: CONVEYORIZED METAL PARTS AND PRODUCTS POWDER COATING LINE CONSISTING OF A GBD INDUSTRIES WASH/RINSE BOOTH WITH A PERMIT EXEMPT 1.9 MMBTU/HR NATURAL GAS INDIRECT-FIRED WATER HEATER, A GEMA MODEL DIAMOND POWDER COATING BOOTH WITH AUTOMATED ELECTROSTATIC APPLICATION EQUIPMENT AND DRY CARTRIDGE FILTERS, A 1.9 MMBTU/HR NATURAL GAS DIRECT-FIRED INFRA-RED DRYING OVEN, AND A 5.4 MMBTU/HR (DERATED TO 4.9 MMBTU/HR) GBD NATURAL GAS DIRECT-FIRED INFRA-RED CURING OVEN.

## CONDITIONS

1. Authority to Construct N-1002-2-9 shall be implemented prior to, or simultaneously with this Authority to Construct. As an alternative to the implementation of ATC N-1002-2-9, Permit to Operate N-1002-2 may be cancelled. [District Rule 2201] Federally Enforceable Through Title V Permit
2. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2520] Federally Enforceable Through Title V Permit
3. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule] Federally Enforceable Through Title V Permit
4. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services

N-1002-4-4 : May 13 2010 1:32PM - SCHONHOM : Joint Inspection NOT Required

5. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
6. Visible emissions from the dust collector shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in anyone hour. [District Rule 2201]
7. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.0] Federally Enforceable Through Title V Permit
8. All coating shall be conducted in the booth with dust collector in place and fan(s) operating. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The filter cleaning frequency shall be adjusted to optimize the control efficiency in accordance with the manufacturer's recommendations. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Filter cleaning and replacement shall be performed in a manner preventing material entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The drying and curing ovens shall be fired only on PUC-regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Powder coating throughput shall not exceed 3,000 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. PM10 emissions from this powder coating operation shall not exceed 0.0025 lb/lb of powder throughput. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Powder coating used in this operation shall not contain any VOC's. [District Rules 2201 and 4603] Federally Enforceable Through Title V Permit
15. The maximum heat input for the curing oven shall not exceed 4.9 MMBtu/hr. The maximum heat input shall be maintained by limiting the number of burners installed in the curing oven so that the heat input does not exceed 4.9 MMBtu/hr. [District Rule 4309] Federally Enforceable Through Title V Permit
16. Only electrostatic coating application equipment shall be used, and it shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4603] Federally Enforceable Through Title V Permit
17. Emissions from the natural gas-fired drying and curing ovens shall not exceed the following: 0.1 lb-NO<sub>x</sub>/MMBtu, 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM10/MMBtu, 0.084 lb-CO/MMBtu, and 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
18. No solvents with VOC shall be used for clean-up or surface preparation. [District Rules 2201 and 4603] Federally Enforceable Through Title V Permit
19. The permittee shall maintain a record for the 5.4 MMBtu/hr curing oven that includes: the date that burners are installed or removed; the manufacturer, model number, and maximum heat input for each type of burner installed ; the quantity of each type of burner installed; and of the combined heat input of the burners installed. [District Rule 4309]
20. The permittee shall maintain daily records of the quantity, type, and VOC content of powder coatings used. [District Rules 2201, 2520, 9.3.2, and 4603] Federally Enforceable Through Title V Permit
21. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 2201, 2520, 9.4.2, and 4603] Federally Enforceable Through Title V Permit