



MAR 22 2011

Mike Davidson
Sanger Boats, Inc.
3316 E Annadale Ave
Fresno, CA 93725

**Re: Notice of Preliminary Decision - Title V Permit Renewal
District Facility # C-1074
Project # C-1095089**

Dear Mr. Davidson:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Sanger Boats, Inc. for its fiberglass boat manufacturing facility located at 3316 E Annadale Ave in Fresno, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 30-day comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,

David Warner
Director of Permit Services

Attachments

C: Sajjad Ahmad, Permit Services Engineer

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) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 861-392-5500 FAX: 861-392-5585



MAR 22 2011

Gerardo C. Rios, Chief
Permits Office (AIR-3)
U.S. EPA - Region IX
75 Hawthorne St.
San Francisco, CA 94105

**Re: Notice of Preliminary Decision – Title V Permit Renewal
District Facility # C-1074
Project # C-1095089**

Dear Mr. Rios:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Sanger Boats, Inc. for its fiberglass boat manufacturing facility located at 3316 E Annadale Ave in Fresno, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 45-day comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,

David Warner
Director of Permit Services

Attachments

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MAR 22 2011

Mike Tollstrup, Chief
Project Assessment Branch
Air Resources Board
P O Box 2815
Sacramento, CA 95812-2815

**Re: Notice of Preliminary Decision - Title V Permit Renewal
District Facility # C-1074
Project # C-1095089**

Dear Mr. Tollstrup:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Sanger Boats, Inc. for its fiberglass boat manufacturing facility located at 3316 E Annadale Ave in Fresno, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 30-day comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,



David Warner
Director of Permit Services

Attachments
C: Sajjad Ahmad, Permit Services Engineer

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Executive Director/Air Pollution Control Officer

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Fresno Bee

**NOTICE OF PRELIMINARY DECISION
FOR THE PROPOSED RENEWAL OF
THE FEDERALLY MANDATED OPERATING PERMIT**

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District solicits public comment on the proposed renewal of the Federally Mandated Operating Permit to Sanger Boats, Inc. for its fiberglass boat manufacturing facility located at 3316 E Annadale Ave in Fresno, California.

The District's analysis of the legal and factual basis for this proposed action, project #C-1095089, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and the District office at the address below. There are no emission changes associated with this proposed action. This will be the public's only opportunity to comment on the specific conditions of the proposed renewal of the Federally Mandated Operating permit. If requested by the public, the District will hold a public hearing regarding issuance of this renewed permit. For additional information, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900. Written comments on the proposed renewed permit must be submitted within 30 days of the publication date of this notice to DAVID WARNER, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 1990 E. GETTYSBURG AVE, FRESNO, CALIFORNIA 93726-0244.

**SAN JOAQUIN VALLEY
AIR POLLUTION CONTROL DISTRICT**

**Title V Permit Renewal Evaluation
Sanger Boats, Inc.
C-1074**

TABLE OF CONTENTS

I.	PROPOSAL.....	1
II.	FACILITY LOCATION.....	1
III.	EQUIPMENT LISTING.....	2
IV.	GENERAL PERMIT TEMPLATE USAGE.....	2
V.	SCOPE OF EPA AND PUBLIC REVIEW.....	2
VI.	FEDERALLY ENFORCEABLE REQUIREMENTS.....	2
VII.	REQUIREMENTS NOT FEDERALLY ENFORCEABLE.....	4
VIII.	PERMIT REQUIREMENTS.....	4
IX.	PERMIT SHIELD.....	24
X.	PERMIT CONDITIONS.....	24
XI.	ATTACHMENTS.....	25
	A. DRAFT RENEWED TITLE V OPERATING PERMIT	
	B. PREVIOUS TITLE V OPERATING PERMIT	
	C. DETAILED FACILITY LIST	
	D. CURRENT DISTRICT RULE 4601 SIP COMPARISON	

TITLE V PERMIT RENEWAL EVALUATION
Fiberglass Boat Manufacturing

Engineer: Sajjad Ahmad
Date: November 18, 2010

Facility Number: C-1074
Facility Name: Sanger Boats, Inc.
Mailing Address: 3316 E Annadale Ave
Fresno, CA 93725

Primary Contact Name: Mike Davidson (President)
Phone: (559) 485-2842

Secondary Contact Name: James Kim (SCS Engineers – Environment Consultants)
Phone: (562) 426-9544

Responsible Official: Mike Davidson
Title: President

Project #: C-1095089
Deemed Complete: November 5, 2009

I. PROPOSAL

Sanger Boats, Inc. (Sanger Boats) was issued a Title V permit on November 31, 2005. As required by District Rule 2520, the applicant is requesting a permit renewal. The existing Title V permit shall be reviewed and modified to reflect all applicable District and federal rules updated, removed, or added since the issuance of the initial Title V permit.

The purpose of this evaluation is to provide the legal and factual basis for all updated applicable requirements and to determine if the facility will comply with these updated requirements. It also specifically identifies all additions, deletions, and/or changes made to permit conditions or equipment descriptions.

II. FACILITY LOCATION

Sanger Boats is located at 3316 E Annadale Avenue in Fresno County, California.

III. EQUIPMENT LISTING

A detailed facility printout listing all permitted equipment at the facility is included as Attachment C.

IV. GENERAL PERMIT TEMPLATE USAGE

The applicant is not proposing to use any model general permit templates as a part of this Title V renewal project.

V. SCOPE OF EPA AND PUBLIC REVIEW

The applicant is not requesting any model general permit templates. Therefore, all federally enforceable conditions in this current Title V permit will be subject to EPA and public review.

VI. FEDERALLY ENFORCEABLE REQUIREMENTS

A. Rules Updated

- District Rule 2020, Exemptions
(amended July 21, 1994 ⇒ amended September 21, 2006)
- District Rule 2201, New and Modified Stationary Source Review Rule
(amended September 21, 2006 ⇒ amended December 18, 2008)
- District Rule 2520, Federally Mandated Operating Permits
(adopted June 15, 1995 ⇒ amended June 21, 2001)
- District Rule 4101, Visible Emissions
(adopted May 21, 1992 ⇒ amended February 17, 2005)
- District Rule 4601, Architectural Coatings
(amended December 17, 1992 ⇒ amended December 17, 2009)
- District Rule 4653, Adhesives (amended September 20, 2007 - SIP approved ⇒ amended September 17, 2009 - not SIP approved)
- District Rule 4684, Polyester Resin Operations (amended December 20, 2001 – SIP approved ⇒ amended September 20, 2007 – not SIP approved ⇒ amended September 17, 2009 – not SIP approved)

B. Rules Removed

- District Rule 8020, 8030, and 8060, Fugitive Dust (PM₁₀) Emissions (amended April 25, 1996). These rules were removed on November 15, 2001 and were replaced with District Rules 8021, 8031, and 8061.

C. Rules Added

- District Rule 8011, General Requirements (adopted November 15, 2001 and amended August 19, 2004)
- District Rule 8021, Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities (adopted November 15, 2001 and amended August 19, 2004)
- District Rule 8031, Bulk Materials (adopted November 15, 2001 and amended August 19, 2004)
- District Rule 8041, Carryout and Trackout (adopted November 15, 2001 and amended August 19, 2004)
- District Rule 8051, Open Areas (adopted November 15, 2001 and amended August 19, 2004)
- District Rule 8061, Paved and Unpaved Roads (adopted November 15, 2001 and amended August 19, 2004)
- District Rule 8071, Unpaved Vehicle/Equipment Traffic Areas (adopted November 15, 2001 and amended September 16, 2004)
- 40 CFR Part 64, Compliance Assurance Monitoring (CAM)

D. Rules Not Updated

- District Rule 1100, Equipment Breakdown (amended December 17, 1992)
- 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos
- 40 CFR Part 82, Subparts B and F, Stratospheric Ozone

VII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

For each Title V source, the District issues a single permit that contains the Federally Enforceable requirements, as well as the District-only requirements. The District-only requirements are not a part of the Title V Operating Permits. The terms and conditions that are part of the facility's Title V permit are designated as "Federally Enforceable Through Title V Permit".

For this facility, the following are not federally enforceable and will not be discussed in further detail:

A. Rules Not Updated

District Rule 4102, Nuisance (as amended December 17, 1992)

For this facility, condition 1 of the facility-wide requirements C-1074-0-3 is based on the rule listed above and is not Federally Enforceable through Title V.

VIII. PERMIT REQUIREMENTS

The purpose of this evaluation is to review changes to federally enforceable requirements; therefore, this compliance section will only address rules that have been amended or added since the issuance of the initial Title V permit.

A. District Rule 1100 – Equipment Breakdown

Although Rule 1100 is by itself not federally enforceable, it is referenced as one of the rules on which three federally enforceable conditions are based.

Conditions #3, 4, and 13 on the facility-wide permit C-1074-0-3 ensure facility-wide compliance with the requirements of this rule.

B. District Rule 2020 – Exemptions

District Rule 2020 lists equipment which is specifically exempt from obtaining permits and specifies recordkeeping requirements to verify such exemptions. The amendments to this rule do not have any affect on current permit requirements and will therefore not be addressed in this evaluation.

C. District Rule 2201 – New and Modified Stationary Source Review Rule

District Rule 2201 has been amended since this facility’s initial Title V permit was issued. This Title V permit renewal does not constitute a modification per section 3.24, defined as an action including at least one of the following items:

- 1) Any change in hours of operation, production rate, or method of operation of an existing emissions unit, which would necessitate a change in permit conditions.
- 2) Any structural change or addition to an existing emissions unit which would necessitate a change in permit conditions. Routine replacement shall not be considered to be a structural change.
- 3) An increase in emissions from an emissions unit caused by a modification of the Stationary Source when the emissions unit is not subject to a daily emissions limitation.
- 4) Addition of any new emissions unit which is subject to District permitting requirements.
- 5) A change in a permit term or condition proposed by an applicant to obtain an exemption from an applicable requirement to which the source would otherwise be subject.

Therefore, the updated requirements of this rule are not applicable to the permits being renewed as a part of this project.

D. District Rule 2520 – Federally Mandated Operating Permits

Section 9.3.2 requires that periodic monitoring be performed if none is associated with a federally enforceable requirement to assure compliance. Conditions 3, 4 and 5 on permits C-1074-10-2 and -11-4 will assure continued compliance with the monitoring requirements of this rule.

Section 9.4 requires that all applicable recordkeeping requirements and that those records shall be maintained for a period of at least five years. Compliance with the requirements of this section is demonstrated with the permit conditions listed in the table below.

Permit Unit	Permit Conditions	Permit Unit	Permit Conditions
C-1074-1-5	11,12	C-1074-8-4	17
C-1074-2-4	17	C-1074-9-4	14
C-1074-3-4	14	C-1074-10-2	13
C-1074-4-4	18	C-1074-11-4	13,14
C-1074-7-4	17	C-1074-12-4	24

There are no federally applicable Greenhouse Gas (GHG) requirements for this source. It should be noted that the Mandatory Greenhouse Gas Reporting rule (40CFR Part 98) is not included in the definition of an applicable requirement within Title V (per 40CFR 71.2). Therefore, there will be no further discussion of GHG in this evaluation.

E. District Rule 4101 – Visible Emissions

District Rule 4101 has been submitted to the EPA to replace SIP approved Rule 401 (all counties of the SJVUAPCD). EPA made a preliminary determination that District Rule 4101 is “more stringent” than the county versions previously referenced, per correspondence dated August 20, 1996.

Section 5.0 prohibits the discharge of any air contaminant for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart; or is of such opacity as to obscure an observer’s view to a degree equal to or greater than the smoke described in Section 5.1 of Rule 4101.

Condition 24 of the facility-wide permit C-1074-0-3 ensures compliance.

F. District Rule 4601 – Architectural Coatings

This rule limits the emissions of VOCs from architectural coatings. It requires limiting the application of any architectural coating to no more than what is listed in the Table of Standards (Section 5.0). This rule further specifies labeling requirements, coatings thinning recommendations, and storage requirements.

The following changes were included in the latest rule amendment that resulted in adding new permit requirements and/or revising current permit requirements:

- The tables outlining the VOC content of different specialty coatings has been largely replaced with the Table of Standards in Section 5.0.
- New labeling, reporting, test methodology and other requirements have been incorporated into the rule in order to allow ARB to administer the Averaging Program as detailed in Section 8.0.

- Current District Rule 4601 (amended 12/17/09) has not been SIP approved. Attachment D contains the streamlining of the SIP approved District Rule 4601 (10/31/01) to the current District Rule 4601 to show the current rule is as stringent if not more than the SIP approved version.

Conditions 25, 26 and 27 of the requirements for this revised facility wide permit C-1074-0-3 will assure compliance with the requirements of this rule.

G. District Rule 4653 – Adhesives (Amended 9/20/07 - SIP Approved, and Amended 9/17/09 - Not SIP Approved)

The following discussion addresses both SIP and Non SIP versions of this rule.

§1.0 Purpose

The purpose of this rule is to reduce emissions of volatile organic compounds (VOCs) from the application of adhesive products, and associated solvent cleaning operations.

§2.0 Applicability

This rule applies to any person who supplies, sells, offers for sale, or applies any adhesive product, or associated solvent, used within the District.

Permit unit C-1074-12 is the only unit at this facility that is subject to this rule.

§5.0 Requirements

Section 5.1.1 states that the VOC content of adhesive products used for specific applications shall not exceed the limits listed in Table 1, expressed as grams of VOC per liter of adhesive product, excluding water and exempt compounds, or grams of VOC per liter of material for low-solids adhesive products, as applied.

Condition 5 of the permit C-1074-12-4 will ensure compliance with the low-VOC material requirements of all versions of this rule (SIP and Non-SIP).

Section 5.1.2 states that the VOC content of adhesive products, except as provided in Section 5.1.1, shall not exceed the limits listed in Table 2, expressed as grams of VOC per liter of adhesive product, excluding water and exempt compounds, or grams of VOC per liter of material for low-solids adhesive products, as applied.

Sanger Boats operates an adhesive application operation that is subject to the VOC content limits specified in Section 5.1.1. Therefore, the VOC limits for the substrate specific applications specified in Section 5.1.2 do not apply.

Section 5.2 states an operator shall use only the following equipment to apply adhesive:

- Electrostatic Application
- Flow Coater
- Roll Coater
- Dip Coater
- Hand Application Methods
- Airless Spray
- HVLP Spray

The adhesive application equipment requirements of Section 5.2 are summarized with the following conditions that satisfy all versions of this rule (SIP and Non-SIP):

- The permittee shall only use the following equipment to apply adhesives: electrostatic application; flow, roll, or dip coater; hand application methods; airless or HVLP spray equipment; or other application equipment approved by the District in writing, shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 4653, 5.2]
- 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 Rules 4653, 5.2.7]
- Air-atomized spray shall be used only for the application of contact adhesives or specialty contact adhesives. [District Rule 4653, 5.2.9]

These conditions have been added as conditions 6 through 8 on the permit C-1074-12-4 to ensure compliance with these requirements.

The adhesives work practice requirements of Section 5.3 are summarized with the following conditions that satisfy all versions of this rule (SIP and Non-SIP):

- The permittee shall store all VOC-containing adhesives, adhesive primers, and process related waste materials in closed containers. [District Rule 4653, 5.3.1]

- The permittee shall ensure that mixing and storage containers for used VOC-containing adhesives, adhesive primers, and process-related waste materials are kept closed at all times except when depositing or removing these materials. [District Rule 4653, 5.3.2]
- The permittee shall minimize spills of VOC-containing adhesives, adhesive primers, and process-related waste materials. [District Rule 4653, 5.3.3]
- The permittee shall convey VOC-containing adhesives, adhesive primers, and process-related waste materials from one location to another in closed containers or pipes. [District Rule 4653, 5.3.4]

These conditions have been added as conditions 9 through 12 on the permit C-1074-12-4 to ensure compliance with these requirements.

The organic solvent cleaning requirements of Section 5.5 are summarized with the following conditions that satisfy all versions of this rule (SIP and Non-SIP):

- VOC content of organic solvents used in cleaning operations shall not exceed any of the following limits: general product cleaning during manufacturing process or surface preparation for adhesive applications: 25 g/l (0.21 lb/gal), surface preparation cleaning prior to rubber vulcanization: 850 g/l (7.1 lb/gal), repair and maintenance cleaning: 25 g/l (0.21 lb/gal), and cleaning of adhesive application equipment: 25 g/l (0.21 lb/gal). [District Rule 4653, 5.5.1]
- Cleaning activities that use solvents, including performing surface preparation cleaning prior to rubber vulcanization with a VOC content greater than 25 g/l (0.21 lb/gallon), shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; or non-atomized solvent flow method in which 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 solvent flushing method in which the cleaning solvent is discharged into a container that 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. [District Rule 4653, 5.5.3 and 5.5.4]

- Solvent shall not be atomized into the open air. This provision shall not apply to the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers. [District Rule 4653, 5.5.5]
- Permittee shall not use VOC-containing materials to clean adhesive application equipment, unless an enclosed system or equipment that is proven to equally effective at controlling emissions is used for cleaning. If an enclosed system is used, it must totally enclose spray guns, cups, nozzles, bowls, and other parts during washing, rinsing and draining procedures, and it must be used according to the manufacturer's recommendations and must be closed when not in use. [District Rule 4653, 5.5.6]

These conditions have been added as conditions 13 through 16 on the permit C-1074-12-4 to ensure compliance with these requirements.

The solvent storage and disposal requirements of Section 5.6 are summarized with the following condition that satisfy all versions of this rule (SIP and Non-SIP):

- Permittee shall store or dispose of adhesives, catalysts, thinners, cleaning materials, fresh or spent solvents, and waste solvent materials such as cloth, paper, etc., in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. The containers used for disposal of adhesive materials, solvents, or any unused VOC containing materials shall be self-closing. [District Rule 4653, 5.6]

This condition has been added as condition 17 on the permit C-1074-12-4 to ensure compliance with these requirements.

The cleaning solvent work practice requirements of Section 5.7 are summarized with the following conditions that satisfy all versions of this rule (SIP and Non-SIP):

- The permittee shall implement the following work practices when participating in organic solvent cleaning activities: 1) minimize spills of VOC-containing cleaning materials, 2) convey VOC-containing cleaning materials from one location to another in closed containers or pipes, and 3) minimize VOC emissions from cleaning of application, storage, mixing, and conveying equipment by ensuring that the equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers. [District Rule 4653, 5.7]

This condition has been added as condition 18 on the permit C-1074-12-4 to ensure compliance with these requirements.

§6.0 Recordkeeping

The recordkeeping requirements of Section 6.1 are summarized with the following conditions that satisfy all versions of this rule (SIP and Non-SIP):

- The permittee shall maintain the following adhesives records on a daily basis: 1) the type and quantity of all adhesive materials used, 2) the VOC content, in grams VOC per liter, of all adhesive materials used, and 3) the VOC content of all solvents used and stored at the site. [District Rule 4653, 6.1.1]
- The permittee shall maintain the following solvent cleaning records on a daily basis: 1) keep a copy of the manufacturer's product data sheet or material safety data sheet of the solvents used for cleaning activities, and 2) maintain a list of solvents that are being used that includes: a) the name of the solvent and it's manufacturer's name, b) the VOC content of the solvent expressed in grams/liter or lb/gallon, c) the VOC content of blended solvents, as applied, d) the type of cleaning activity for each solvent used, and e) the quantity of solvents used for cleaning operations. [District Rule 4653, 6.1.4]
- Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 1070, 2520, 9.4.2 and 4653, 6.1.5]

These conditions have been added as conditions 22 through 24 on the permit C-1074-12-4 to ensure compliance with these requirements.

The labeling requirements of Section 6.2 are summarized with the following conditions that satisfy all versions of this rule (SIP and Non-SIP):

- Each container of adhesive product subject to this rule shall display the maximum VOC content of the adhesive product as applied. The VOC content shall be displayed as grams of VOC per liter of adhesive product, excluding water and exempt compounds, or grams of VOC per liter of material for low-solids adhesive products. Each container of solvent subject to this rule shall display the maximum VOC content (in grams of VOC per liter of material) as applied. [District Rule 4653, 6.2.1]
- Each container of adhesive product subject to this rule shall display a statement of the manufacturer's recommendations regarding thinning, reducing, or mixing of the adhesive product with any other VOC

containing material. Mixing recommendations shall specify a ratio which results in a compliant, as applied, adhesive product. [District Rule 4653, 6.2.2]

These conditions have been added as conditions 19 and 20 on the permit C-1074-12-4 to ensure compliance with these requirements.

H. Rule 4684 – Polyester Resin Production (Amended 9/17/09 - Not SIP Approved)

The following discussion addresses both SIP and Non SIP versions of this rule.

§1.0 Purpose

The purpose of this rule is to reduce VOC emissions from polyester resin operations, the organic solvent cleaning, and the storage and disposal of solvents and waste solvent materials associated with such operations.

§2.0 Applicability

This rule applies to commercial and industrial polyester resin operations, and to the organic solvent cleaning, and the storage and disposal of all solvents and waste solvent materials associated with such operations.

Per Section 3.41, a *Polyester Resin Operation* is defined as "methods used for the production or rework of products by mixing, pouring, hand layup, impregnating, injecting, forming, winding, spraying, and/or curing with fiberglass, fillers, or any other reinforcement materials and associated cleanup."

As such, permit units C-1074-1 thru -4, and -7 thru -9 are subject to this rule.

§5.0 Requirements

C-1074-1, -2, -3, -4, -7, -8 and -9 (resin and gel coat operations):

Section 5.1.1 requires the applicant to:

- 1) Use Low VOC resins, except for specialty resins and gelcoats, that contain no more than 35% monomer by weight. Use Low VOC pigmented gel coats that contain no more than 45% monomer by weight. Use Low VOC specialty resins and clear gelcoats that contain no more than 50% monomer by weight. Or,

- 2) Use resin containing a vapor suppressant such that the weight loss from the VOC emissions does not exceed 60 grams per square meter of exposed surface during resin polymerization. Or,
- 3) Use a closed-mold system. Or,
- 4) Install and operate an emissions control system which is approved by the District, designed and operated for maximum collection of fugitive emissions from polyester resin materials with a capture and control efficiency of 85% or greater on a mass basis.

All of the resins and gel coats used at this facility comply with the monomer content limits specified in this rule.

While the rule limits monomer content, BACT limits total VOC content. Since monomers are VOC's, VOC limits automatically limit monomer content. The requirements of Section 51.1 are summarized with the following conditions that satisfy all versions of this rule (SIP and Non-SIP):

- The monomer content of polyester materials used at this facility shall be equal to or less than the following: for polyester resins, 35% by weight; for pigmented gel coats, 45% by weight; for specialty resins and clear gel coats, 50% by weight. [District Rule 4684, 5.1.1.1]

This condition has been added on the proposed permits as summarized in the table below:

Permit Unit	Permit Condition
C-1074-1-5	4
C-1074-2-4	7
C-1074-3-4	4
C-1074-4-4	8
C-1074-7-4	7
C-1074-8-4	7
C-1074-9-4	4

Section 5.1.2 requires that the spray application of polyester resin shall only be performed using airless, air assisted airless, high-volume, low-pressure (HVLP) spray equipment, or electrostatic spray equipment.

Section 5.1.2.1 requires that the High-Volume, Low-Pressure (HVLP) spray equipment shall be operated in accordance with the manufacturer's recommendations.

Section 5.1.2.2 requires that for HVLP spray guns manufactured prior to January 1, 1996, the end user shall demonstrate that the gun meets HVLP spray equipment standards. Satisfactory proof will be either in the form of manufacturer's published technical material or by a demonstration using a certified air pressure tip gauge, measuring the air atomizing pressure dynamically at the center of the air cap and at the air horns.

Section 5.1.2.3 requires that a person shall not sell or offer for sale for use within the District any HVLP spray gun without a permanent marking denoting the maximum inlet air pressure in psig at which the gun will operate within the parameters specified in Section 3.0.

The requirements of these sections are summarized with the following conditions that satisfy all versions of this rule (SIP and Non-SIP):

- Spray application of polyester resin shall only be performed using airless, air assisted airless, high-volume low-pressure (HVLP) spray equipment, or electrostatic spray equipment. [District Rule 4684 5.1.2]
- High-Volume, Low-Pressure (HVLP) spray equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4684, 5.1.2.1]
- For HVLP spray guns manufactured prior to January 1, 1996, the end user shall demonstrate that the gun meets HVLP spray equipment standards, Satisfactory proof will be either in the form of manufacturer's published material or by a demonstration using a certified air pressure tip gauge, measuring the air atomizing pressure dynamically at the center of the air cap and at the air horns. [District Rule 4684, 5.1.2.2]

These conditions have been added on the proposed permits as summarized in the table below:

Permit Unit	Permit Conditions
C-1074-1-5	7
C-1074-2-4	8, 9, and 10
C-1074-3-4	5, 6, and 7
C-1074-4-4	9, 10, and 11
C-1074-7-4	8, 9, and 10
C-1074-8-4	8, 9, and 10
C-1074-9-4	5, 6, and 7

Fiberglass boat manufacturing operations are subject to section 5.2. There are no requirements for fiberglass boat manufacturing operations at this time. However, there are requirements beginning January 1, 2011.

The requirements of Section 5.2 are summarized with the following conditions that satisfy all versions of this rule (SIP and Non-SIP):

- Open molding resin and gel coat VOC contents shall not exceed any of the following limits, expressed in weighted average monomer VOC content (weight percent limit): production resin atomized spray: 28%, production resin nonatomized: 35%, pigmented gel coat: 33%, clear gel coat: 48%, tooling resin atomized spray: 30%, tooling resin nonatomized: 39%, tooling gel coat: 40%. [District Rule 4684, 5.2.2.4]
- All containers greater than 208 liters (55 gallons), including those used for on-site mixing of putties and polyputties, have a cover with no visible gaps in place at all times, except when material is being manually added or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container. [District Rule 4684, 5.2.2.8]

Section 5.3.1 requires that an operator shall not use organic solvents for cleaning operations that exceed the VOC content limits specified in Table 3, in accordance with the corresponding effective date.

Table 3 VOC Content Limits for Organic Solvents Used in Cleaning Operations

Type of Solvent Cleaning Operation	VOC Content Limit Grams of VOC/liter of material (lb/gal)
A. Product Cleaning During Manufacturing Process or Surface Preparation for Coating Application	25 (0.21)
B. Repair and Maintenance Cleaning	25 (0.21)
C. Cleaning of Polyester Resin Application Equipment	25 (0.21)

Section 5.4 requires that an owner or operator shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in self-closing, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty.

The requirements of these sections are summarized with the following conditions that satisfy all versions of this rule (SIP and Non-SIP):

- The VOC content of organic solvents used in cleaning operations shall not exceed 25 g/l (0.21 lb/gal). [District Rule 4684, 5.3]
- Permittee shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in self-closing non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4684, 5.4]

These conditions have been added on the proposed permits as summarized in the table below:

Permit Unit	Permit Conditions
C-1074-1-5	5 and 6
C-1074-2-4	11 and 12
C-1074-3-4	8 and 9
C-1074-4-4	12 and 13
C-1074-7-4	11 and 12
C-1074-8-4	11 and 12
C-1074-9-4	8 and 9

§6.1 Recordkeeping

Section 6.1 requires that an operator subject to this rule shall maintain the following records:

- 1) Daily records of the type and quantity of all resins, gel coats, fillers, catalysts, and cleaning materials (including cleaning solvents) used in each operation.
- 2) Records of the VOC content, in weight percent, of all polyester resin and gel coat, filler materials, including the weight percent of non-monomer VOC content of the resin and gel coat, used or stored at the stationary source.
- 3) Records of the VOC content of all cleaning materials used and stored at the stationary source as specified in Section 5.3.
- 4) Records showing the weight loss per square meter during resin polymerization for each vapor-suppressed resin.

Section 6.1.7 requires that the operator shall retain the records specified in Sections 6.1.1 through 6.1.6, as applicable, on site for a period of five years, make the records available on site during normal business hours to the APCO, ARB, or EPA, and submit the records to the APCO, ARB, or EPA upon request.

The requirements of these sections are summarized with the following conditions that satisfy all versions of this rule (SIP and Non-SIP):

- Permittee shall maintain the following records on a daily basis: 1) the type and quantity of all resins, gel coats, fillers, catalysts, and cleaning materials (including cleaning solvents), 2) the VOC content, in weight percent, of all polyester resin and gel coat, filler materials, including the weight percent of non-monomer VOC content of the resin and gel coat, used or stored at the facility, 3) the VOC content of all cleaning materials used and stored, and 4) the weight loss per square meter during resin polymerization for each vapor-suppressed resin. [District Rule 4684, 6.1]
- Permittee shall retain all records on site for a period of five years, shall make the records available on site during normal business hours to the District, ARB, or EPA, and shall submit the records to the District, ARB, or EPA upon request. [District Rules 2520, 9.4.2 and 4684, 6.1.7]

These conditions have been added on the proposed permits as summarized in the table below:

Permit Unit	Permit Conditions
C-1074-1-5	11 and 12
C-1074-2-4	16 and 17
C-1074-3-4	13 and 14
C-1074-4-4	17 and 18
C-1074-7-4	16 and 17
C-1074-8-4	16 and 17
C-1074-9-4	13 and 14

I. District Rule 8011 – General Requirements

The purpose of Regulation VIII (Fugitive PM10 Prohibitions) is to reduce ambient concentrations of fine particulate matter (PM10) by requiring actions to prevent, reduce or mitigate anthropogenic fugitive dust emissions. The Rules contained in this Regulation have been developed pursuant to United States Environmental Protection Agency guidance for Serious PM10 Nonattainment Areas. The rules are applicable to specified anthropogenic fugitive dust sources. Fugitive dust contains PM10 and particles larger than PM10. Controlling fugitive dust missions when visible emissions are detected will not prevent all PM10 emissions, but will substantially reduce PM10 emissions.

The provisions of this rule are applicable to specified outdoor fugitive dust sources. The definitions, exemptions, requirements, administrative requirements, recordkeeping requirements, and test methods set forth in this rule are applicable to all Rules under Regulation VIII (Fugitive PM10 Prohibitions) of the Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District.

Conditions 31 through 36 of the facility-wide permit C-1074-0-3 will ensure compliance with these requirements.

J. District Rule 8021 - Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities

The purpose of this rule is to limit fugitive dust emissions from construction, demolition, excavation, extraction, and other earthmoving activities.

This rule applies to any construction, demolition, excavation, extraction, and other earthmoving activities, including, but not limited to, land clearing, grubbing, scraping, travel on site, and travel on access roads to and from the site. This rule also applies to the construction of new landfill disposal sites or modification to existing landfill disposal sites prior to commencement of landfilling activities.

Section 5.0 requires that no person shall perform any construction, demolition, excavation, extraction, or other earthmoving activities unless the appropriate requirements in sections 5.1 and 5.2 are sufficiently implemented to limit VDE to 20% opacity. In addition to the requirements of this rule, a person shall comply with all other applicable requirements of Regulation VIII.

Condition 31 of the facility-wide permit C-1074-0-3 will ensure compliance with these requirements.

K. District Rule 8031 - Bulk Materials

The purpose of this rule is to limit fugitive dust emissions from the outdoor handling, storage, and transport of bulk materials.

This rule applies to the outdoor handling, storage, and transport of any bulk material.

Section 5.0 requires that no person shall perform any outdoor handling, storage, and transport of bulk materials unless the appropriate requirements in Table 8031-1 of this rule are sufficiently implemented to limit VDE to 20% opacity or to comply with the conditions for a stabilized surface as defined in Rule 8011. In addition to the requirements of this rule, a person shall comply with all other applicable requirements of Regulation VIII.

Condition 32 of the facility-wide permit C-1074-0-3 will ensure compliance with these requirements.

L. District Rule 8041 - Carryout and Trackout

The purpose of this rule is to limit fugitive dust emissions from carryout and trackout.

This rule applies to all sites that are subject to Rules 8021 (Construction, Demolition, Excavation, Extraction, and other Earthmoving Activities), 8031 (Bulk Materials), and 8071 (Unpaved Vehicle and Equipment Traffic Areas) where carryout or trackout has occurred or may occur.

Section 5.0 requires that an owner/operator shall sufficiently prevent or cleanup carryout and trackout as specified in sections 5.1 through 5.8. In addition to the requirements of this rule, a person shall comply with all other applicable requirements of Regulation VIII. The use of blower devices, or dry rotary brushes or brooms, for removal of carryout and trackout on public roads is expressly prohibited. The removal of carryout and trackout from paved public roads does not exempt an owner/operator from obtaining state or local agency permits which may be required for the cleanup of mud and dirt on paved public roads.

Condition 33 of the facility-wide permit C-1074-0-3 will ensure compliance with these requirements.

M. District Rule 8051 - Open Areas

The purpose of this rule is to limit fugitive dust emissions from open areas.

This rule applies to any open area having 3.0 acres or more of disturbed surface area, that has remained undeveloped, unoccupied, unused, or vacant for more than seven days.

Section 5.0 requires that whenever open areas are disturbed or vehicles are used in open areas, the owner/operator shall implement one or a combination of control measures indicated in Table 8051-1 to comply with the conditions of a stabilized surface at all times and to limit VDE to 20% opacity. In addition to the requirements of this rule, a person shall comply with all other applicable requirements of Regulation VIII.

Condition 34 of the facility-wide permit C-1074-0-3 will ensure compliance with these requirements.

N. District Rule 8061 - Paved and Unpaved Roads

The purpose of this rule is to limit fugitive dust emissions from paved and unpaved roads by implementing control measures and design criteria.

This rule applies to any new or existing public or private paved or unpaved road, road construction project, or road modification project.

Condition 35 of the facility-wide permit C-1074-0-3 will ensure compliance with these requirements.

O. District Rule 8071 - Unpaved Vehicle/Equipment Traffic Area

The purpose of this rule is to limit fugitive dust emissions from unpaved vehicle and equipment traffic areas by implementing control measures and design criteria.

This rule applies to any unpaved vehicle/equipment traffic area of 1.0 acre or larger.

Condition 36 of the facility-wide permit C-1074-0-3 will ensure compliance with these requirements.

P. 40 CFR Part 60, Subpart DDD – Standard of Performance for Volatile Organic Compound (VOC) Emissions for Polymer Manufacturing Industry

The provisions of this subpart apply to affected facilities involved in the manufacture of polystyrene. The affected facilities for process emissions from polystyrene manufacturing processes that use a continuous process are each material recovery section. These process sections are affected facilities for only those process emissions that are emitted continuously.

This facility is not subject to the requirements of this subpart since the application of polyester resins and fiberglass mixed is not considered a polymer manufacturing process.

Q. 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos

These regulations apply to demolition or renovation activity, as defined in 40 CFR 61.141. 40 CFR Section 61.150 of this Subpart was amended September 18, 2003, and condition 37 of C-1074-0-3 assures compliance with the requirements.

R. 40 CFR Part 63, Subpart JJJ – National Emission Standards for Hazardous Air Pollutant Emissions: Group IV Polymers and Resins

The application of polyester resins at this facility does not involve any TPPU (Thermoplastic Product Process Unit) manufacturing any thermoplastic products. Therefore, this 40 CFR 63 subpart JJJ is not applicable.

S. 40 CFR 63, Subpart VVVV – NESHAP Boat Manufacturing

The purpose of this rule is to set limits on the HAP content of resins, gel coats, clean-up solvents, and adhesives used in the manufacture of fiberglass boats. The rule also establishes work practice standards for facilities.

Section 63.5698 lists materials that are exempt from the HAP content limits and are excluded from the open molding emission limit. Condition 61 of the facility-wide permit C-1074-0-3 ensures compliance.

Section 63.5701 lists the options available for showing compliance with the organic HAP emission limit. Condition 43 of the facility-wide permit C-1074-0-3 ensures compliance.

Sections 63.5698 and 63.5710 establish the requirements needed to show compliance with the organic HAP emission limit when utilizing the emissions averaging method. Conditions 46 through 50 of the facility-wide permit C-1074-0-3 ensure compliance.

Section 63.5713 establishes the requirements needed to show compliance with the organic HAP emission limit when utilizing the compliant materials method. Conditions 44 and 45 of the facility-wide permit C-1074-0-3 ensure compliance.

Section 63.5731 establishes the work practice standards concerning resin and gel coat mixing operations when using 55 gallon or greater containers. Conditions 51 and 54 of the facility-wide permit C-1074-0-3 ensure compliance.

Section 63.5734 requires that cleaning solvents contain no more than 5% organic HAP by weight. Conditions 52 and 53 of the facility-wide permit C-1074-0-3 ensure compliance.

Section 63.5737 establishes the work practice standards concerning the storage of solvents that are used for the cleaning of application equipment. Conditions 54 and 56 of the facility-wide permit C-1074-0-3 ensure compliance.

Section 63.5740 establishes the content limit for carpet and fabric adhesives and also requires that records of the organic HAP content be maintained. Conditions 55 and 56 of the facility-wide permit C-1074-0-3 ensure compliance.

Section 63.5758 establishes the methods that shall be used for determining the HAP content of affected materials. Condition 57 of the facility-wide permit C-1074-0-3 ensures compliance.

Section 63.5761 describes the notification requirements for facilities subject to this subpart. Condition 58 of the facility-wide permit C-1074-0-3 ensures compliance.

Section 63.5764 describes schedule for submitting annual compliance reports and procedures to follow when any deviations from work practice standards or emission limits occur. Conditions 59 and 60 of the facility-wide permit C-1074-0-3 ensure compliance.

Section 63.5767 identifies the records, in addition to those specified in individual sections of this subpart, which must be kept and maintained. Condition 62 of the facility-wide permit C-1074-0-3 ensure compliance.

T. 40 CFR Part 64, Compliance Assurance Monitoring

40 CFR Part 64 requires CAM for units that meet the following three criteria:

- 1) the unit must have an emission limit for the pollutant;
- 2) the unit must have add-on controls for the pollutant; these are devices such as flue gas recirculation (FGR), baghouses, and catalytic oxidizers; and
- 3) the unit must have a pre-control potential to emit greater than the major source thresholds.

Permit Unit C-1074-1 is not subject to CAM because the operation is not served by an add-on control device.

Permit Units C-1074-2, '-3 '-4, '-5, '-6, '-7, '-8, '-9, and '-12 are not subject to CAM because they do not contain emission limits for any pollutants.

Permit unit C-1074-10 may be subject to CAM for PM₁₀, as there is a PM₁₀ limit, and it does have add-on control in the form of a baghouse. In order to require CAM, the pre-control potential to emit for the unit must exceed the major source threshold for PM₁₀ emissions. The pre-control emissions will be calculated based on the permit condition limiting sawdust collected by the baghouse to 3.2 lb/day.

Max. Quantity of Sawdust Collected:	3.2 lb/day
Baghouse Control Efficiency:	98.9%
PM ₁₀ Fraction:	1.0 lb-PM ₁₀ /lb-PM
Daily PM ₁₀ Entering the Baghouse =	1.0 lb-PM ₁₀ /lb-PM x 3.2 lb ÷ 0.989
=	3.24 lb-PM ₁₀ /day
Annual PM ₁₀ Emissions	= 3.24 lb of PM ₁₀ /day × 365 days
=	1,183 lb/year

The PM₁₀ emissions are less than the major source threshold of 140,000 lb/year. CAM will therefore not be required for Permit Unit C-1074-10.

Permit unit C-1074-11 may be subject to CAM for PM₁₀, as there is a PM₁₀ limit, and it does have add-on control in the form of a baghouse. In order to require CAM, the pre-control potential to emit for the unit must exceed the major source threshold for PM₁₀ emissions. The pre-control emissions will be calculated based on the permit condition limiting the maximum PM₁₀ emissions to 1.0 lb/day.⁽¹⁾

⁽¹⁾ The permit currently limits the PM₁₀ concentration of the exhaust of the baghouse serving this operation to 0.004 grains/dscf. The equipment description states that the baghouse has a 1,200 scfm blower. Therefore, the maximum daily PM₁₀ potential to emit was determined using the following calculation: 0.004 grains/dscf x 1,200 scf/min x 1,440 min/day x 1 lb/7,000 grains = 1.0 lb PM₁₀/day.

Max. PM ₁₀ Emissions:	1.0 lb/day
Baghouse Control Efficiency:	99%
PM ₁₀ Fraction:	1.0 lb-PM ₁₀ /lb-PM
Daily PM ₁₀ Entering the Baghouse =	1.0 lb-PM ₁₀ /lb-PM x 1.0 lb/day ÷ 0.99
	= 100 lb-PM ₁₀ /day
Annual PM ₁₀ Emissions =	100 lb of PM ₁₀ /day × 365 days
	= 36,500 lb/year

The uncontrolled PM₁₀ emissions are less than the major source threshold of 140,000 lb/year. Therefore, CAM will not be required for Permit Unit C-1074-11.

U. 40 CFR Part 82, Subparts B and F, Stratospheric Ozone

These regulations apply to servicing motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC). Sections of this regulation were amended in 2004 and 2008, and conditions 29 and 30 of C-1074-0-3 assure compliance with the requirements.

IX. PERMIT SHIELD

A permit shield legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Title V permit. Compliance with the terms and conditions of the Operating Permit is considered compliance with all applicable requirements upon which those conditions are based, including those that have been subsumed.

A. Requirements Addressed by Model General Permit Templates

The applicant is not requesting to use any model general permit templates for this Title V renewal project.

B. Requirements not Addressed by Model General Permit Templates

There are no existing permit shields on the current PTO nor has Sanger Boats proposed any new permit shields on the renewal PTO's.

X. PERMIT CONDITIONS

See Attachment A - Draft Renewed Title V Operating Permit.

XI. ATTACHMENTS

- A. Draft Renewed Title V Operating Permit
- B. Previous Title V Operating Permit
- C. Detailed Facility List
- D. Current District Rule 4601 SIP Comparison

ATTACHMENT A

Draft Renewed Title V Operating Permit

San Joaquin Valley Air Pollution Control District

FACILITY: C-1074-0-3

EXPIRATION DATE: 04/30/2010

FACILITY-WIDE REQUIREMENTS

1. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Facility-wide volatile organic compound (VOC) emissions shall be less than 50,000 lb/year. [District NSR Rule] Federally Enforceable Through Title V Permit
3. {2285} The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
4. {2286} The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
5. {2287} The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
6. {2288} Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (3/21/02). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
7. {2289} The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.12.1] Federally Enforceable Through Title V Permit
8. {2290} A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
9. {2291} Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
10. {2292} The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

11. {2293} The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
12. {2294} The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
13. {2295} Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
14. {2296} If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
15. {2297} It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
16. {2298} The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
17. {2299} The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
18. {2300} The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
19. {2301} The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
20. {2302} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
21. {2303} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
22. {2304} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
23. {2305} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

24. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (2/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
25. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in the Table of Standards of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
26. All VOC-containing materials for architectural coatings subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
27. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
28. {2310} With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
29. {2311} If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
30. {2312} If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR 82, Subpart B. [40 CFR 82, Subpart B] Federally Enforceable Through Title V Permit
31. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/04) or Rule 8011 (8/19/04). [District Rule 8021 and 8011] Federally Enforceable Through Title V Permit
32. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/04) or Rule 8011 (8/19/04). [District Rule 8031 and 8011] Federally Enforceable Through Title V Permit
33. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/04) or Rule 8011 (8/19/04). [District Rule 8041 and 8011] Federally Enforceable Through Title V Permit
34. Whenever open areas are disturbed or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/04) or Rule 8011 (8/19/04). [District Rule 8051 and 8011] Federally Enforceable Through Title V Permit
35. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/04) or Rule 8011 (8/19/04). [District Rule 8061 and Rule 8011] Federally Enforceable Through Title V Permit
36. Any unpaved vehicle/equipment area that anticipates more than 75 vehicle trips per day shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 100 vehicle trips per day shall comply with the requirements of Section 5.1.2 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/04) or Rule 8011 (8/19/04). [District Rule 8071 and Rule 8011] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

37. {2319} Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit
38. {2320} The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
39. {2321} The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
40. {2322} When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
41. {2323} Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), and Rule 111 (Kern, Tulare, Kings). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
42. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601, sections 5.1, 5.2, 5.3, and 5.8 (12/17/09); 8021 (8/19/04); 8031 (8/19/04); 8041 (8/19/04); 8051 (8/19/04); 8061 (8/19/04); and 8071 (9/16/04). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
43. Permittee shall demonstrate compliance with the organic Hazardous Air Pollutant (HAP) emission limit requirements of 40 CFR 63, Subpart VVVV (National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing) using the compliant materials option or the emissions averaging option. Compliance using either option shall be demonstrated on a 12-month rolling-average basis and shall be determined at the end of every month (12 times per year). The first 12 month period begins on August 23, 2004. [40 CFR 63.5701, 40 CFR 63.5710(a) and 40 CFR 63.5713(a)] Federally Enforceable Through Title V Permit
44. While using the compliant materials option, the organic HAP content limits, by weight, are listed as follows: Production resin applied with atomization - 28%; Production resin applied with nonatomization - 35%; pigmented gel coat applied with any method - 33%; clear gel coat applied with any method - 48%; tooling resin applied with atomization - 30%; tooling resin applied with nonatomization - 39%; or tooling gel coat applied with any method - 40%. [40 CFR 63.5713(a)] Federally Enforceable Through Title V Permit
45. While using the compliant materials option, compliance shall be demonstrated if each of the resins and gel coats used by a facility have organic HAP contents no greater than the applicable organic HAP content limits specified above. If any of the resins or gel coats used by a facility have organic HAP contents greater than the applicable organic HAP content limits specified above, the permittee shall demonstrate compliance for that specific gel coat or resin category by using Equation 1 of 40 CFR 63.5713(c): Weighted-Average HAP Content (%) = [summation of (Mi x HAPi)] / [summation of Mi], where Mi = mass of open molding resin or gel used in the past 12 months, in megagrams; and HAPi = the organic HAP content, by weight percent, of each open molding resin or gel coat used in the past 12 months. If the weighted-average HAP content exceeds the applicable organic HAP content limits specified above, compliance has not been demonstrated using the compliant materials option. [40 CFR 63.5713] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

46. While using the emissions averaging option, the permittee shall use Equation 1 of 40 CFR 63.5710(b) to demonstrate that the organic HAP emissions from this facility do not exceed the organic HAP emission limit determined by Equation 1 of 40 CFR 63.5698(b), for the same 12-month period. If the result of Equation 1 of 40 CFR 63.5710(b) is greater than the result of Equation 1 of 40 CFR 63.5698(b), compliance has not been demonstrated using the emissions averaging option. [40 CFR 63.5710(b)] Federally Enforceable Through Title V Permit
47. While using the emissions averaging option, the organic HAP emissions from this facility shall not exceed the limit established by Equation 1 of 40 CFR 63.5698(b): $HAP\ Limit = [(46 \times Mr) + (159 \times Mpg) + (291 \times Mcg) + (54 \times Mtr) + (214 \times Mtg)]$, where Mr = mass of production resins used in the past 12 months; Mpg = mass of pigmented gel coats used in the past 12 months; Mcg = mass of clear gel coats used in the past 12 months; Mtr = mass of tooling resins used in the past 12 months; and Mtg = mass of tooling gel coats used in the past 12 months. All units are in megagrams. [40 CFR 63.5698(b)] Federally Enforceable Through Title V Permit
48. While using the emissions averaging option, the permittee shall calculate actual HAP emissions from the preceding 12 months using Equation 1 of 40 CFR 63.5710(b): $Actual\ HAP\ Emissions = (PVr \times Mr) + (PVpg \times Mpg) + (PVcg \times Mcg) + (PVtr \times Mtr) + (PVtg \times Mtg)$, where PVr = weighted-average MACT model point value for production resin used in the past 12 months; Mr = mass of production resin used in the past 12 months; PVpg = weighted-average MACT model point value for pigmented gel coat used in the past 12 months; Mpg = mass of pigmented gel coats used in the past 12 months; PVcg = weighted-average MACT model point value for clear gel coat used in the past 12 months; Mcg = mass of clear gel coats used in the past 12 months; PVtr = weighted-average MACT model point value for tooling resin used in the past 12 months; Mtr = mass of tooling resins used in the past 12 months; PVtg = weighted-average MACT model point value for tooling gel coat used in the past 12 months; and Mtg = mass of tooling gel coats used in the past 12 months. All mass units are in megagrams and all weighted-average MACT model point values are in kilograms per megagram. [40 CFR 63.5710(b)] Federally Enforceable Through Title V Permit
49. While using the emissions averaging option, the weighted-average MACT point values for each resin or gel coat used by this facility shall be determined using Equation 2 of 40 CFR 63.5710(c): $Weighted-Average\ MACT\ Point\ Value\ (PVr, PVpg, PVcg, PVtr\ and\ PVtg) = [summation\ of\ (Mi \times PVi)] / [summation\ of\ Mi]$, where Mi = mass of each resin or gel coat used within the past 12 months, in megagrams; and PVi = MACT model point value for each resin or gel coat used within the past 12 months, in kilograms of HAP per megagram of material applied. [40 CFR 63.5710(c)] Federally Enforceable Through Title V Permit
50. While using the emissions averaging option, the MACT model point values for all resins and gel coats applied shall be determined using the formulas listed in Table 3 of 40 CFR 63, Subpart VVVV: atomized resin - $[0.014 \times (Resin\ HAP\%,\ by\ weight)^{2.425}]$; atomized resin, plus vacuum bagging with roll out - $[0.01185 \times (Resin\ HAP\%,\ by\ weight)^{2.425}]$; atomized resin, plus vacuum bagging without roll out - $[0.00945 \times (Resin\ HAP\%,\ by\ weight)^{2.425}]$; nonatomized resin - $[0.014 \times (Resin\ HAP\%,\ by\ weight)^{2.275}]$; nonatomized resin, plus bagging with roll out - $[0.0110 \times (Resin\ HAP\%,\ by\ weight)^{2.275}]$; nonatomized resin, plus bagging without roll out - $[0.0076 \times (Resin\ HAP\%,\ by\ weight)^{2.275}]$. [40 CFR 63.5710(d)] Federally Enforceable Through Title V Permit
51. All gel coat and resin mixing containers with a capacity equal to or greater than 55 gallons, including those used for on-site mixing of putties and polyputties shall have a cover. The covers shall have no visible gaps and shall be in place at all times, except when material is being manually added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container. [40 CFR 63.5731(a)(b)] Federally Enforceable Through Title V Permit
52. For routine flushing or resin and gel coat application equipment (e.g. spray guns, flowcoaters, brushes, rollers, and squeegees), permittee shall use cleaning solvents that contain no more than 5% organic HAP, by weight. For removal of cured resin and gel coat from application equipment, no organic HAP content limit applies. [40 CFR 63.5734(a)] Federally Enforceable Through Title V Permit
53. Organic HAP-containing solvents used for removing cured resin or gel coat shall be stored in containers with covers. The covers must have no visible gaps and shall be in place at all times, except when equipment to be cleaned is placed in or removed from the container. On containers with a capacity greater than 2 gallons, the distance from the top of the container to the solvent surface must be equal to or greater than 0.75 times the diameter of the container. [40 CFR 63.5734(b)] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE
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54. At least once per month, 55 gallon or greater mixing containers and all containers holding organic HAP containing solvents used for removing cured resin or gel coat must be inspected to ensure the covers have no visible gaps. Records of the inspections and any repairs made to the covers must be kept. [40 CFR 63.5731(c)(d) and 63.5737(c)] Federally Enforceable Through Title V Permit
55. Permittee shall use adhesives that contain no more than 5% by weight of organic HAP content for all carpet and fabric operations. [40 CFR 63.5740(a)] Federally Enforceable Through Title V Permit
56. Permittee shall maintain a record of the organic HAP content of cleaning solvents used for routine cleaning of resin and gel coat application equipment and adhesives used for all carpet and fabric operations. [40 CFR 63.5737(a) and 63.5740(b)] Federally Enforceable Through Title V Permit
57. Permittee shall determine HAP content of affected materials using one or more of the methods outlined in 40 CFR 63.5758. [40 CFR 63.5758] Federally Enforceable Through Title V Permit
58. Permittee shall submit a notification of compliance status to the District no later than 30 days after the end of the first 12-month averaging period. The notification shall include the following: type and quantity of HAP's emitted at the facility; the method used to determine compliance; the method that will be used to determine continuing compliance; and a statement by the permittee as to whether the facility has complied with the HAP content limits. If there is a change to information submitted in the notification, changes shall be submitted in writing within 15 days after the change. [40 CFR 63.5761] Federally Enforceable Through Title V Permit
59. Permittee shall submit a compliance report to the District every 6 months. The first compliance report shall be submitted no later than 60 days after 12/31/05. Each subsequent report shall cover the applicable semiannual reporting period from January 1 through June 30 or from July 1 through December 31. Each subsequent compliance report shall be submitted no later than 60 days after the end of the semiannual reporting period. [40 CFR 63.5764(b)] Federally Enforceable Through Title V Permit
60. The compliance report shall include the following information: (1) Company name and address; (2) Signed and dated statement by a responsible official certifying the truth, accuracy, and completeness of the report; (3) Dates covered by the compliance report; (4) Description of any changes in the manufacturing process since the last compliance report; (5) Table or statement showing, for each regulated operation, the applicable organic HAP content limit and application equipment requirement with which the facility is complying and the actual weighted-average organic HAP content for each operation during each of the rolling 12-month averaging periods that end during the reporting period; (6) If compliance is achieved during the reporting period, a statement indicating such effect shall be included with the report; and (7) If any of the regulated operations were not in compliance during the reporting period, the following shall be included with the semiannual compliance report: (i) Operation(s) involved in the deviation; (ii) quantity, organic HAP content, and application method of the materials involved in the deviation; (iii) actions taken to minimize the deviation and to prevent it in the future; and (iv) Statement of whether or not the facility was in compliance for the 12-month averaging period that ended at the end of the reporting period. [40 CFR 63.5764(c)] Federally Enforceable Through Title V Permit
61. The following exemptions apply to the gel coat and resin operations: (1) Gel coat materials used for part/mold repair and touch up shall be exempt from the organic HAP content limits. The total gel coat materials used in this exemption shall not exceed 1 percent by weight of all gel coat used at the facility on a 12-month rolling-average basis. Records shall be kept of the amount of gel coats used per month for which this exemption is being used and copies of calculations showing that the exempt amount does not exceed 1 percent of all gel coat used. (2) Pure 100% vinylester resin used for skin coats. The total resin materials included in the exemption shall not exceed 5% by weight of all resin used at the facility on a 12-month rolling-average basis. Records shall be kept of the amount of 100 percent vinylester skin coat used per month for which this exemption is being used and copies of calculations showing that the exempt amount does not exceed 5% percent of all resin used. [40 CFR 63.5698(d)] Federally Enforceable Through Title V Permit

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FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

62. Permittee shall maintain the following records, in addition to those records required by conditions of this permit: (1) a copy of each notification and report submitted to the District; (2) Support documentation for any notice or report submitted to the District; (3) Total amounts of each production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat used per month and the weighted-average organic HAP content for each category of material, expressed as weight percent (this record is not required if all materials used comply with the organic HAP content requirements); (4) for production resin and tooling resin the amounts of each applied by atomized or nonatomized methods. [40 CFR 63.5767] Federally Enforceable Through Title V Permit
63. On May 31, 2005, the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin January 1 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1074-1-5

EXPIRATION DATE: 04/30/2010

EQUIPMENT DESCRIPTION:

POLYESTER RESIN AND FIBERGLASS APPLICATION OPERATION TO HULL MOLDS FOR THE MANUFACTURE OF BOATS CONSISTING OF HVLP, NON-ATOMIZING FLOW COATER APPLICATOR(S), FIVE 1.5 HP EXHAUST FANS, ONE 7.5 HP EXHAUST FAN AND TWO 15 HP COMPRESSORS

PERMIT UNIT REQUIREMENTS

1. All exhaust fans shall be on prior to the start of and during polyester resin and fiberglass application. [District NSR Rule] Federally Enforceable Through Title V Permit
2. VOC emissions from this polyester resin application operation shall not exceed 77.0 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
3. VOC emissions from resins used shall be calculated as follows: Resin Usage (gal/day) x Density of Resin (lb/gal) x 1 ton/2000 lb x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table (lb/ton). [District NSR Rule] Federally Enforceable Through Title V Permit
4. The monomer (VOC) content of polyester resins used shall be less than or equal to 35%, by weight. [District NSR Rule and District Rule 4684, 5.1.1.1] Federally Enforceable Through Title V Permit
5. Open molding resin and gel coat VOC contents shall not exceed any of the following limits, expressed in weighted average monomer VOC content (weight percent limit): production resin atomized spray: 28%, production resin nonatomized: 35%, pigmented gel coat: 33%, clear gel coat: 48%, tooling resin atomized spray: 30%, tooling resin nonatomized: 39%, tooling gel coat: 40%. [District Rule 4684, 5.2.2.4] Federally Enforceable Through Title V Permit
6. All containers greater than 208 liters (55 gallons), including those used for on-site mixing of putties and polyputties, have a cover with no visible gaps in place at all times, except when material is being manually added or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container. [District Rule 4684, 5.2.2.8] Federally Enforceable Through Title V Permit
7. Application of any polyester resin material shall only be performed by one of the following methods: 1) non-atomized spray technique; 2) flowcoaters; 3) pressure-fed rollers; 4) resin impregnators; 5) hand layup; or 6) any equivalent method as approved by the APCO. [District NSR Rule and District Rule 4684] Federally Enforceable Through Title V Permit
8. The VOC content of organic solvents used in cleaning operations shall not exceed 25 g/l (0.21 lb/gal). [District Rule 4684, 5.3] Federally Enforceable Through Title V Permit
9. Permittee shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in self-closing, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4684, 5.4] Federally Enforceable Through Title V Permit
10. Permittee shall keep records of the daily and cumulative annual (calendar year) VOC emissions. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

11. Permittee shall maintain the following records on a daily basis: 1) the type and quantity of all resins, gel coats, fillers, catalysts, and cleaning materials (including cleaning solvents), 2) the VOC content, in weight percent, of all polyester resin and gel coat, filler materials, including the weight percent of non-monomer VOC content of the resin and gel coat, used or stored at the facility, 3) the VOC content of all cleaning materials used and stored, and 4) the weight loss per square meter during resin polymerization for each vapor-suppressed resin. [District Rules 2520, 9.4.2 and 4684, 6.1] Federally Enforceable Through Title V Permit
12. Permittee shall retain all records on site for a period of five years, shall make the records available on site during normal business hours to the District, ARB, or EPA, and shall submit the records to the District, ARB, or EPA upon request. [District Rules 2520, 9.4.2 and 4684, 6.1.7] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1074-2-4

EXPIRATION DATE: 04/30/2010

EQUIPMENT DESCRIPTION:

POLYESTER GEL COAT APPLICATION OPERATION TO MOLDS CONSISTING OF HVLP AND AIR-ASSISTED AIRLESS SPRAY GUNS, A 14'W X 26'L X 9'H DEVLBISS SPRAY BOOTH (BOOTH #1), 14 (20" X 20") FILTERS, AND A 2 HP EXHAUST FAN

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. All filters shall be properly maintained and must be in place during the gel coat operation. [District Rule 4102]
3. VOC emissions from this gel coat application operation shall not exceed 20.2 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
4. VOC's from gelcoats shall be calculated as follows: Gelcoat Usage (gal/day) x Density of gelcoat (lb/gal) x 1 ton/2000 lb x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table for styrene + Gelcoat usage (gal/day) x Density of gelcoat (lb/gal) x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table for MMA. [District NSR Rule] Federally Enforceable Through Title V Permit
5. PM10 emissions from this gel coat application operation shall not exceed 15.8 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
6. PM10 emissions from gelcoats used shall be calculated as follows: Gelcoat Usage (gal/day) x Density of Gelcoat (lb/gal) x Solids Content (% by weight) x 0.187. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The monomer content of polyester materials used at this facility shall be equal to or less than the following: for polyester resins, 35% by weight; for pigmented gel coats, 45% by weight; for specialty resins and clear gel coats, 50% by weight. [District Rule 4684, 5.1.1.1] Federally Enforceable Through Title V Permit
8. Spray application of polyester resin shall only be performed using airless, air assisted airless, high-volume low-pressure (HVLP) spray equipment, or electrostatic spray equipment. [District Rule 4684 5.1.2] Federally Enforceable Through Title V Permit
9. High-Volume, Low-Pressure (HVLP) spray equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4684, 5.1.2.1] Federally Enforceable Through Title V Permit
10. For HVLP spray guns manufactured prior to January 1, 1996, the end user shall demonstrate that the gun meets HVLP spray equipment standards. Satisfactory proof will be either in the form of manufacturer's published material or by a demonstration using a certified air pressure tip gauge, measuring the air atomizing pressure dynamically at the center of the air cap and at the air horns. [District Rule 4684, 5.1.2.2] Federally Enforceable Through Title V Permit
11. Open molding resin and gel coat VOC contents shall not exceed any of the following limits, expressed in weighted average monomer VOC content (weight percent limit): production resin atomized spray: 28%, production resin nonatomized: 35%, pigmented gel coat: 33%, clear gel coat: 48%, tooling resin atomized spray: 30%, tooling resin nonatomized: 39%, tooling gel coat: 40%. [District Rule 4684, 5.2.2.4] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

12. All containers greater than 208 liters (55 gallons), including those used for on-site mixing of putties and polyputties, have a cover with no visible gaps in place at all times, except when material is being manually added or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container. [District Rule 4684, 5.2.2.8] Federally Enforceable Through Title V Permit
13. The VOC content of organic solvents used in cleaning operations shall not exceed 25 g/l (0.21 lb/gal). [District Rule 4684, 5.3] Federally Enforceable Through Title V Permit
14. Permittee shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in self-closing, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4684, 5.4] Federally Enforceable Through Title V Permit
15. Permittee shall keep records of the daily and cumulative annual (calendar year) VOC emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Permittee shall maintain the following records on a daily basis: 1) the type and quantity of all resins, gel coats, fillers, catalysts, and cleaning materials (including cleaning solvents), 2) the VOC content, in weight percent, of all polyester resin and gel coat, filler materials, including the weight percent of non-monomer VOC content of the resin and gel coat, used or stored at the facility, 3) the VOC content of all cleaning materials used and stored, and 4) the weight loss per square meter during resin polymerization for each vapor-suppressed resin. [District Rule 4684, 6.1] Federally Enforceable Through Title V Permit
17. Permittee shall retain all records on site for a period of five years, shall make the records available on site during normal business hours to the District, ARB, or EPA, and shall submit the records to the District, ARB, or EPA upon request. [District Rules 2520, 9.4.2 and 4684, 6.1.7] Federally Enforceable Through Title V Permit

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1074-3-4

EXPIRATION DATE: 04/30/2010

EQUIPMENT DESCRIPTION:

POLYESTER RESIN AND FIBERGLASS APPLICATION OPERATION TO MOLDS CONSISTING OF HVLP, NON-ATOMIZING FLOW COATER APPLICATOR(S), A 12'W X 10'L X 8'H SPRAY BOOTH (BOOTH #2), 28 (20" X 20") FILTERS AND A 2 HP EXHAUST FAN

PERMIT UNIT REQUIREMENTS

1. All filters shall be properly maintained and must be in place during the resin operation. [District Rule 4102]
2. VOC emissions from this polyester resin and fiberglass application operation shall not exceed 25.8 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
3. VOC emissions from resins used shall be calculated as follows: Resin Usage (gal/day) x Density of Resin (lb/gal) x 1 ton/2000 lb x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table (lb/ton). [District NSR Rule] Federally Enforceable Through Title V Permit
4. The monomer content of polyester materials used at this facility shall be equal to or less than the following: for polyester resins, 35% by weight; for pigmented gel coats, 45% by weight; for specialty resins and clear gel coats, 50% by weight. [District Rule 4684, 5.1.1.1] Federally Enforceable Through Title V Permit
5. Spray application of polyester resin shall only be performed using airless, air assisted airless, high-volume low-pressure (HVLP) spray equipment, or electrostatic spray equipment. [District Rule 4684 5.1.2] Federally Enforceable Through Title V Permit
6. High-Volume, Low-Pressure (HVLP) spray equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4684, 5.1.2.1] Federally Enforceable Through Title V Permit
7. For HVLP spray guns manufactured prior to January 1, 1996, the end user shall demonstrate that the gun meets HVLP spray equipment standards, Satisfactory proof will be either in the form of manufacturer's published material or by a demonstration using a certified air pressure tip gauge, measuring the air atomizing pressure dynamically at the center of the air cap and at the air horns. [District Rule 4684, 5.1.2.2] Federally Enforceable Through Title V Permit
8. Open molding resin and gel coat VOC contents shall not exceed any of the following limits, expressed in weighted average monomer VOC content (weight percent limit): production resin atomized spray: 28%, production resin nonatomized: 35%, pigmented gel coat: 33%, clear gel coat: 48%, tooling resin atomized spray: 30%, tooling resin nonatomized: 39%, tooling gel coat: 40%. [District Rule 4684, 5.2.2.4] Federally Enforceable Through Title V Permit
9. All containers greater than 208 liters (55 gallons), including those used for on-site mixing of putties and polyputties, have a cover with no visible gaps in place at all times, except when material is being manually added or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container. [District Rule 4684, 5.2.2.8] Federally Enforceable Through Title V Permit
10. The VOC content of organic solvents used in cleaning operations shall not exceed 25 g/l (0.21 lb/gal). [District Rule 4684, 5.3] Federally Enforceable Through Title V Permit
11. Permittee shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in self-closing, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4684, 5.4] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

12. Permittee shall keep records of the daily and cumulative annual (calendar year) VOC emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
13. Permittee shall maintain the following records on a daily basis: 1) the type and quantity of all resins, gel coats, fillers, catalysts, and cleaning materials (including cleaning solvents), 2) the VOC content, in weight percent, of all polyester resin and gel coat, filler materials, including the weight percent of non-monomer VOC content of the resin and gel coat, used or stored at the facility, 3) the VOC content of all cleaning materials used and stored, and 4) the weight loss per square meter during resin polymerization for each vapor-suppressed resin. [District Rule 4684, 6.1] Federally Enforceable Through Title V Permit
14. Permittee shall retain all records on site for a period of five years, shall make the records available on site during normal business hours to the District, ARB, or EPA, and shall submit the records to the District, ARB, or EPA upon request. [District Rules 2520, 9.4.2 and 4684, 6.1.7] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1074-4-4

EXPIRATION DATE: 04/30/2010

EQUIPMENT DESCRIPTION:

POLYESTER GEL COAT APPLICATION OPERATION TO MOLDS CONSISTING OF HVLP AND AIR-ASSISTED AIRLESS SPRAY GUNS, A 13'W X 15'L X 10'H SPRAY KING 200 SPRAY/TOOLING BOOTH (BOOTH #5), 18 (20" X 20") FILTERS AND A 2 HP EXHAUST FAN

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. All filters shall be properly maintained and must be in place during the resin and gel coat operations. [District Rule 4102]
3. VOC emissions from this resin and gel coat application operation shall not exceed 14.2 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
4. VOC emissions from resins used shall be calculated as follows: Resin Usage (gal/day) x Density of Resin (lb/gal) x 1 ton/2000 lb x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table (lb/ton). [District NSR Rule] Federally Enforceable Through Title V Permit
5. VOC emissions from gelcoats used shall be calculated as follows: Gelcoat Usage (gal/day) x Density of Gelcoat (lb/gal) x 1 ton/2000 lb x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table for styrene + Gelcoat Usage (gal/day) x Density of Gelcoat (lb/gal) x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table for MMA. [District NSR Rule] Federally Enforceable Through Title V Permit
6. PM10 emissions from this resin and gel coat application operation shall not exceed 7.6 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
7. PM10 emissions from gelcoats used shall be calculated as follows: Gelcoat Usage (gal/day) x Density of Gelcoat (lb/gal) x Solids Content (% by weight) x 0.187. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The monomer content of polyester materials used at this facility shall be equal to or less than the following: for polyester resins, 35% by weight; for pigmented gel coats, 45% by weight; for specialty resins and clear gel coats, 50% by weight. [District Rule 4684, 5.1.1.1] Federally Enforceable Through Title V Permit
9. Spray application of polyester resin shall only be performed using airless, air assisted airless, high-volume low-pressure (HVLP) spray equipment, or electrostatic spray equipment. [District Rule 4684 5.1.2] Federally Enforceable Through Title V Permit
10. High-Volume, Low-Pressure (HVLP) spray equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4684, 5.1.2.1] Federally Enforceable Through Title V Permit
11. For HVLP spray guns manufactured prior to January 1, 1996, the end user shall demonstrate that the gun meets HVLP spray equipment standards, Satisfactory proof will be either in the form of manufacturer's published material or by a demonstration using a certified air pressure tip gauge, measuring the air atomizing pressure dynamically at the center of the air cap and at the air horns. [District Rule 4684, 5.1.2.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

12. Open molding resin and gel coat VOC contents shall not exceed any of the following limits, expressed in weighted average monomer VOC content (weight percent limit): production resin atomized spray: 28%, production resin nonatomized: 35%, pigmented gel coat: 33%, clear gel coat: 48%, tooling resin atomized spray: 30%, tooling resin nonatomized: 39%, tooling gel coat: 40%. [District Rule 4684, 5.2.2.4] Federally Enforceable Through Title V Permit
13. All containers greater than 208 liters (55 gallons), including those used for on-site mixing of putties and polyputties, have a cover with no visible gaps in place at all times, except when material is being manually added or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container. [District Rule 4684, 5.2.2.8] Federally Enforceable Through Title V Permit
14. The VOC content of organic solvents used in cleaning operations shall not exceed 25 g/l (0.21 lb/gal). [District Rule 4684, 5.3] Federally Enforceable Through Title V Permit
15. Permittee shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in self-closing, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4684, 5.4] Federally Enforceable Through Title V Permit
16. Permittee shall keep records of the daily and cumulative annual (calendar year) VOC emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Permittee shall maintain the following records on a daily basis: 1) the type and quantity of all resins, gel coats, fillers, catalysts, and cleaning materials (including cleaning solvents), 2) the VOC content, in weight percent, of all polyester resin and gel coat, filler materials, including the weight percent of non-monomer VOC content of the resin and gel coat, used or stored at the facility, 3) the VOC content of all cleaning materials used and stored, and 4) the weight loss per square meter during resin polymerization for each vapor-suppressed resin. [District Rule 4684, 6.1] Federally Enforceable Through Title V Permit
18. Permittee shall retain all records on site for a period of five years, shall make the records available on site during normal business hours to the District, ARB, or EPA, and shall submit the records to the District, ARB, or EPA upon request. [District Rules 2520, 9.4.2 and 4684, 6.1.7] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1074-5-2

EXPIRATION DATE: 04/30/2010

EQUIPMENT DESCRIPTION:

WOOD AND FIBERGLASS TRIM GRINDING OPERATION CONSISTING OF A 12'W X 24'L X 9'H PARTS GRINDING BOOTH (BOOTH #3), 20 (20" X 20") FILTERS AND A 2 HP EXHAUST FAN

PERMIT UNIT REQUIREMENTS

1. All filters shall be properly maintained and must be in place during the grinding operation. [District Rule 4102]
2. All equipment or systems installed or used to achieve compliance with the terms and conditions of this permit shall be maintained in good working order and be operated as efficiently as possible to minimize air pollution emissions. [District Rule 4102]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1074-6-2

EXPIRATION DATE: 04/30/2010

EQUIPMENT DESCRIPTION:

WOOD AND FIBERGLASS TRIM GRINDING OPERATION CONSISTING OF A 14'W X 48'L X 10'H SPRAY KING 200 GRINDING BOOTH (BOOTH #4), 18 (20" X 20") FILTERS AND A 2 HP EXHAUST FAN

PERMIT UNIT REQUIREMENTS

1. All filters shall be properly maintained and must be in place during the grinding operation. [District Rule 4102]
2. All equipment or systems installed or used to achieve compliance with the terms and conditions of this permit shall be maintained in good working order and be operated as efficiently as possible to minimize air pollution emissions. [District Rule 4102]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1074-7-4

EXPIRATION DATE: 04/30/2010

EQUIPMENT DESCRIPTION:

POLYESTER GEL COAT APPLICATION OPERATION TO MOLDS AND PATTERNS CONSISTING OF HVLP AND AIR-ASSISTED AIRLESS SPRAY GUNS, A 14'W X 26'L X 9'H DEVILBISS SPRAY BOOTH (BOOTH #6), 12 (24" X 20") FILTERS AND A 2 HP EXHAUST FAN

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. All filters shall be properly maintained and must be in place during the gel coat operation. [District Rule 4102]
3. VOC emissions from this gel coat application operation shall not exceed 97.6 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
4. VOC emissions from gelcoats used shall be calculated as follows: Gelcoat Usage (gal/day) x Density of Gelcoat (lb/gal) x 1 ton/2000 lb x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table for styrene + Gelcoat Usage (gal/day) x Density of Gelcoat (lb/gal) x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table for MMA. [District NSR Rule] Federally Enforceable Through Title V Permit
5. PM10 emissions from this resin and gel coat application operation shall not exceed 79.4 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
6. PM10 emissions from gelcoats used shall be calculated as follows: Gelcoat Usage (gal/day) x Density of Gelcoat (lb/gal) x Solids Content (% by weight) x 0.187. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The monomer content of polyester materials used at this facility shall be equal to or less than the following: for polyester resins, 35% by weight; for pigmented gel coats, 45% by weight; for specialty resins and clear gel coats, 50% by weight. [District Rule 4684, 5.1.1.1] Federally Enforceable Through Title V Permit
8. Spray application of polyester resin shall only be performed using airless, air assisted airless, high-volume low-pressure (HVLP) spray equipment, or electrostatic spray equipment. [District Rule 4684 5.1.2] Federally Enforceable Through Title V Permit
9. High-Volume, Low-Pressure (HVLP) spray equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4684, 5.1.2.1] Federally Enforceable Through Title V Permit
10. For HVLP spray guns manufactured prior to January 1, 1996, the end user shall demonstrate that the gun meets HVLP spray equipment standards. Satisfactory proof will be either in the form of manufacturer's published material or by a demonstration using a certified air pressure tip gauge, measuring the air atomizing pressure dynamically at the center of the air cap and at the air horns. [District Rule 4684, 5.1.2.2] Federally Enforceable Through Title V Permit
11. Open molding resin and gel coat VOC contents shall not exceed any of the following limits, expressed in weighted average monomer VOC content (weight percent limit): production resin atomized spray: 28%, production resin nonatomized: 35%, pigmented gel coat: 33%, clear gel coat: 48%, tooling resin atomized spray: 30%, tooling resin nonatomized: 39%, tooling gel coat: 40%. [District Rule 4684, 5.2.2.4] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

12. All containers greater than 208 liters (55 gallons), including those used for on-site mixing of putties and polyputties, have a cover with no visible gaps in place at all times, except when material is being manually added or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container. [District Rule 4684, 5.2.2.8] Federally Enforceable Through Title V Permit
13. The VOC content of organic solvents used in cleaning operations shall not exceed 25 g/l (0.21 lb/gal). [District Rule 4684, 5.3] Federally Enforceable Through Title V Permit
14. Permittee shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in self-closing, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4684, 5.4] Federally Enforceable Through Title V Permit
15. Permittee shall keep records of the daily and cumulative annual (calendar year) VOC emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Permittee shall maintain the following records on a daily basis: 1) the type and quantity of all resins, gel coats, fillers, catalysts, and cleaning materials (including cleaning solvents), 2) the VOC content, in weight percent, of all polyester resin and gel coat, filler materials, including the weight percent of non-monomer VOC content of the resin and gel coat, used or stored at the facility, 3) the VOC content of all cleaning materials used and stored, and 4) the weight loss per square meter during resin polymerization for each vapor-suppressed resin. [District Rule 4684, 6.1] Federally Enforceable Through Title V Permit
17. Permittee shall retain all records on site for a period of five years, shall make the records available on site during normal business hours to the District, ARB, or EPA, and shall submit the records to the District, ARB, or EPA upon request. [District Rules 2520, 9.4.2 and 4684, 6.1.7] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1074-8-4

EXPIRATION DATE: 04/30/2010

EQUIPMENT DESCRIPTION:

POLYESTER GEL COAT APPLICATION OPERATION TO MOLDS AND PATTERNS CONSISTING OF HVLP AND AIR-ASSISTED AIRLESS SPRAY GUNS, A 14'W X 26'L X 9'H DEVILBISS SPRAY BOOTH (BOOTH #7), 12 (24" X 20") FILTERS AND A 2 HP EXHAUST FAN

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. All filters shall be properly maintained and must be in place during the gel coat operation. [District Rule 4102]
3. VOC emissions from this gel coat application operation shall not exceed 97.6 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
4. VOC emissions from gelcoats used shall be calculated as follows: Gelcoat Usage (gal/day) x Density of Gelcoat (lb/gal) x 1 ton/2000 lb x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table for styrene + Gelcoat usage (gal/day) x Density of gelcoat (lb/gal) x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table for MMA. [District NSR Rule] Federally Enforceable Through Title V Permit
5. PM10 emissions from this resin and gel coat application operation shall not exceed 79.4 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
6. PM10 emissions from gelcoats used shall be calculated as follows: Gelcoat Usage (gal/day) x Density of Gel Coat (lb/gal) x Solids Content (% by weight) x 0.187. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The monomer content of polyester materials used at this facility shall be equal to or less than the following: for polyester resins, 35% by weight; for pigmented gel coats, 45% by weight; for specialty resins and clear gel coats, 50% by weight. [District Rule 4684, 5.1.1.1] Federally Enforceable Through Title V Permit
8. Spray application of polyester resin shall only be performed using airless, air assisted airless, high-volume low-pressure (HVLP) spray equipment, or electrostatic spray equipment. [District Rule 4684 5.1.2] Federally Enforceable Through Title V Permit
9. High-Volume, Low-Pressure (HVLP) spray equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4684, 5.1.2.1] Federally Enforceable Through Title V Permit
10. For HVLP spray guns manufactured prior to January 1, 1996, the end user shall demonstrate that the gun meets HVLP spray equipment standards. Satisfactory proof will be either in the form of manufacturer's published material or by a demonstration using a certified air pressure tip gauge, measuring the air atomizing pressure dynamically at the center of the air cap and at the air horns. [District Rule 4684, 5.1.2.2] Federally Enforceable Through Title V Permit
11. Open molding resin and gel coat VOC contents shall not exceed any of the following limits, expressed in weighted average monomer VOC content (weight percent limit): production resin atomized spray: 28%, production resin nonatomized: 35%, pigmented gel coat: 33%, clear gel coat: 48%, tooling resin atomized spray: 30%, tooling resin nonatomized: 39%, tooling gel coat: 40%. [District Rule 4684, 5.2.2.4] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

12. All containers greater than 208 liters (55 gallons), including those used for on-site mixing of putties and polyputties, have a cover with no visible gaps in place at all times, except when material is being manually added or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container. [District Rule 4684, 5.2.2.8] Federally Enforceable Through Title V Permit
13. The VOC content of organic solvents used in cleaning operations shall not exceed 25 g/l (0.21 lb/gal). [District Rule 4684, 5.3] Federally Enforceable Through Title V Permit
14. Permittee shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in self-closing, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4684, 5.4] Federally Enforceable Through Title V Permit
15. Permittee shall keep records of the daily and cumulative annual (calendar year) VOC emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Permittee shall maintain the following records on a daily basis: 1) the type and quantity of all resins, gel coats, fillers, catalysts, and cleaning materials (including cleaning solvents), 2) the VOC content, in weight percent, of all polyester resin and gel coat, filler materials, including the weight percent of non-monomer VOC content of the resin and gel coat, used or stored at the facility, 3) the VOC content of all cleaning materials used and stored, and 4) the weight loss per square meter during resin polymerization for each vapor-suppressed resin. [District Rule 4684, 6.1] Federally Enforceable Through Title V Permit
17. Permittee shall retain all records on site for a period of five years, shall make the records available on site during normal business hours to the District, ARB, or EPA, and shall submit the records to the District, ARB, or EPA upon request. [District Rules 2520, 9.4.2 and 4684, 6.1.7] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1074-9-4

EXPIRATION DATE: 04/30/2010

EQUIPMENT DESCRIPTION:

POLYESTER RESIN APPLICATION OPERATION TO WOOD COMPONENTS CONSISTING OF A 14'W X 26'L X 9'H DEVILBISS SPRAY BOOTH (BOOTH #8), 14 (20" X 20") FILTERS AND A 2 HP EXHAUST FAN

PERMIT UNIT REQUIREMENTS

1. All filters shall be properly maintained and must be in place during the resin operation. [District Rule 4102]
2. VOC emissions from this polyester resin application operation shall not exceed 5.0 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
3. VOC emissions from resins used shall be calculated as follows: Resin Usage (gal/day) x Density of Resin (lb/gal) x 1 ton/2000 lb x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table (lb/ton). [District NSR Rule] Federally Enforceable Through Title V Permit
4. The monomer content of polyester materials used at this facility shall be equal to or less than the following: for polyester resins, 35% by weight; for pigmented gel coats, 45% by weight; for specialty resins and clear gel coats, 50% by weight. [District Rule 4684, 5.1.1.1] Federally Enforceable Through Title V Permit
5. Spray application of polyester resin shall only be performed using airless, air assisted airless, high-volume low-pressure (HVLP) spray equipment, or electrostatic spray equipment. [District Rule 4684 5.1.2] Federally Enforceable Through Title V Permit
6. High-Volume, Low-Pressure (HVLP) spray equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4684, 5.1.2.1] Federally Enforceable Through Title V Permit
7. For HVLP spray guns manufactured prior to January 1, 1996, the end user shall demonstrate that the gun meets HVLP spray equipment standards, Satisfactory proof will be either in the form of manufacturer's published material or by a demonstration using a certified air pressure tip gauge, measuring the air atomizing pressure dynamically at the center of the air cap and at the air horns. [District Rule 4684, 5.1.2.2] Federally Enforceable Through Title V Permit
8. Open molding resin and gel coat VOC contents shall not exceed any of the following limits, expressed in weighted average monomer VOC content (weight percent limit): production resin atomized spray: 28%, production resin nonatomized: 35%, pigmented gel coat: 33%, clear gel coat: 48%, tooling resin atomized spray: 30%, tooling resin nonatomized: 39%, tooling gel coat: 40%. [District Rule 4684, 5.2.2.4] Federally Enforceable Through Title V Permit
9. All containers greater than 208 liters (55 gallons), including those used for on-site mixing of putties and polyputties, have a cover with no visible gaps in place at all times, except when material is being manually added or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container. [District Rule 4684, 5.2.2.8] Federally Enforceable Through Title V Permit
10. The VOC content of organic solvents used in cleaning operations shall not exceed 25 g/l (0.21 lb/gal). [District Rule 4684, 5.3] Federally Enforceable Through Title V Permit
11. Permittee shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in self-closing, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4684, 5.4] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

12. Permittee shall keep records of the daily and cumulative annual (calendar year) VOC emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
13. Permittee shall maintain the following records on a daily basis: 1) the type and quantity of all resins, gel coats, fillers, catalysts, and cleaning materials (including cleaning solvents), 2) the VOC content, in weight percent, of all polyester resin and gel coat, filler materials, including the weight percent of non-monomer VOC content of the resin and gel coat, used or stored at the facility, 3) the VOC content of all cleaning materials used and stored, and 4) the weight loss per square meter during resin polymerization for each vapor-suppressed resin. [District Rule 4684, 6.1] Federally Enforceable Through Title V Permit
14. Permittee shall retain all records on site for a period of five years, shall make the records available on site during normal business hours to the District, ARB, or EPA, and shall submit the records to the District, ARB, or EPA upon request. [District Rules 2520, 9.4.2 and 4684, 6.1.7] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1074-10-2

EXPIRATION DATE: 04/30/2010

EQUIPMENT DESCRIPTION:

A METAL CUTTING OPERATION WITH A BRILLIANT, MODEL BDM51, CUTTING SAW SERVED BY AN AERCOLOGY/DONALDSON, MODEL DM-1500 BAGHOUSE

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Visible emissions from the dust collector shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Visible emissions shall be inspected quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
4. Dust collection system shall be inspected annually, while in operation, for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
5. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
6. All filters shall be properly maintained and must be in place during the cutting operation. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Material removed from dust collector shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Filter media shall have a certified average control efficiency of 98.9% efficiency between 1 and 10 microns [District NSR Rule, District Rule 4102 and CH&SC 41700] Federally Enforceable Through Title V Permit
9. The quantity of material collected by dust collector shall not exceed 3.2 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Stainless Steel PM10 emission rate shall not exceed 0.78 lb/year. [District Rule 4102 and CH&SC 41700]
11. PM emission exhaust stack height will be at least 7.62 meter and exhaust flow shall not be impeded vertically upward. [District Rule 4102 and CH&SC 41700]
12. Records of the following shall be maintained: (a) Date Stainless Steel metal is cut; (b) Calculated weight of Stainless Steel metal removed by cutting per day in pounds; (c) Weight of material removed from the dust collector; (d) Cumulative days of cutting between material removal from dust collector. [District NSR Rule, District Rule 4102 and CH&SC 41700] Federally Enforceable Through Title V Permit
13. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1074-11-4

EXPIRATION DATE: 04/30/2010

EQUIPMENT DESCRIPTION:

WOODWORKING OPERATION WITH ONE (1) RADIAL ARM SAW, ONE (1) TABLE SAW, SERVED BY A 1,200 CFM LMC 160-IRI-A AND ONE (1) ROUTER SERVED BY A 6,000 CFM DUST TECHNOLOGY MODEL DT-150 DUST COLLECTOR

PERMIT UNIT REQUIREMENTS

1. PM10 emissions from the dust collectors shall not exceed 0.004 gr/dscf. [District NSR Rule and District Rule 4201] Federally Enforceable Through Title V Permit
2. Visible emissions from any dust collectors shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Visible emissions shall be inspected quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
4. Dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
5. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
6. The appropriate dust collector exhaust fan shall be switched on prior to the start-up of any woodworking equipment. [District NSR Rule] Federally Enforceable Through Title V Permit
7. All ducting and control equipment shall be in good working order to prevent fugitive particulate emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
8. All filters shall be properly maintained and must be in place during the woodworking operation(s). [District NSR Rule] Federally Enforceable Through Title V Permit
9. Each dust collector cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District NSR Rule] Federally Enforceable Through Title V Permit
10. At least one replacement filter for each dust collector shall be maintained on the premises. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Material removed from dust collectors shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
12. All material that becomes deposited on the ground or any part of the dust collection system as a result of collection or material removal shall be cleaned up immediately. [District NSR Rule] Federally Enforceable Through Title V Permit
13. Records of dust collector maintenance, inspections, and repairs shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

14. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit

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These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1074-12-4

EXPIRATION DATE: 04/30/2010

EQUIPMENT DESCRIPTION:

ADHESIVE OPERATION WITH A 15 HP COMPRESSOR AND HIGH VOLUME LOW PRESSURE (HVLP) SPRAY EQUIPMENT

PERMIT UNIT REQUIREMENTS

1. VOC emissions from this adhesive application operation shall not exceed 2.0 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
2. VOC emissions from adhesives used shall be calculated as follows: Adhesive Usage (gal/day) x VOC Content (lb/gal) x 0.25. [District NSR Rule] Federally Enforceable Through Title V Permit
3. PM10 emissions from the spray application of adhesive shall not exceed 3.7 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
4. PM10 emissions from adhesives used shall be calculated as follows: Adhesive Usage (gal/day) x Density of Adhesive (lb/gal) x Solids Content (% , by weight) x 0.25. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The VOC content of adhesive products used for specific applications shall not exceed the following limits, expressed as grams of VOC per liter of adhesive product, excluding water and exempt compounds, or grams of VOC per liter of material for low-solids adhesive products, as applied, except where specified elsewhere in this permit: multipurpose construction, 200 g/l; floor covering installation, 150 g/l; ceramic tile installation, 130 g/l; perimeter bonded sheet flooring installation, 660 g/l; single-ply roof material installation, 250 g/l; structural glazing, 100 g/l; ABS welding adhesive, 400 g/l; CPVC welding adhesive, 490 g/l; PVC welding adhesive, 500 g/l; other plastic cement welding adhesive, 450 g/l; plastic cement welding adhesive primer, 650 g/l; adhesive primers, 250 g/l; staple and nail manufacturing 640 g/l; contact adhesive, 250 g/l; contact adhesive-specialty, 250 g/l; rubber vulcanization adhesive/primer, 850g/l; waterproof resorcinol glue, 170 g/l. [District Rule 4653, 5.1.1] Federally Enforceable Through Title V Permit
6. The permittee shall only use the following equipment to apply adhesives: electrostatic application; flow, roll, or dip coater; hand application methods; airless or HVLP spray equipment; or other application equipment approved by the District in writing, shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4653, 5.2] Federally Enforceable Through Title V Permit
7. 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 4653, 5.2.7] Federally Enforceable Through Title V Permit
8. Air-atomized spray shall only be used for the application of contact adhesives or specialty contact adhesives. [District Rule 4653, 5.2.9] Federally Enforceable Through Title V Permit
9. The permittee shall store all VOC-containing adhesives, adhesive primers, and process related waste materials in closed containers. [District Rule 4653, 5.3.1] Federally Enforceable Through Title V Permit
10. The permittee shall ensure that mixing and storage containers for used VOC-containing adhesives, adhesive primers, and process-related waste materials are kept closed at all times except when depositing or removing these materials. [District Rule 4653, 5.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

11. The permittee shall minimize spills of VOC-containing adhesives, adhesive primers, and process-related waste materials. [District Rule 4653, 5.3.3] Federally Enforceable Through Title V Permit
12. The permittee shall convey VOC-containing adhesives, adhesive primers, and process-related waste materials from one location to another in closed containers or pipes. [District Rule 4653, 5.3.4] Federally Enforceable Through Title V Permit
13. VOC content of organic solvents used in cleaning operations shall not exceed any of the following limits: general product cleaning during manufacturing process or surface preparation for adhesive applications: 25 g/l (0.21 lb/gal), surface preparation cleaning prior to rubber vulcanization: 850 g/l (7.1 lb/gal), repair and maintenance cleaning: 25 g/l (0.21 lb/gal), and cleaning of adhesive application equipment: 25 g/l (0.21 lb/gal). [District Rule 4653, 5.5.1] Federally Enforceable Through Title V Permit
14. Cleaning activities that use solvents, including performing surface preparation cleaning prior to rubber vulcanization with a VOC content greater than 25 g/l (0.21 lb/gallon), shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; or non-atomized solvent flow method in which 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 solvent flushing method in which the cleaning solvent is discharged into a container that 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 [District Rule 4653, 5.5.3 and 5.5.4] Federally Enforceable Through Title V Permit
15. Solvent shall not be atomized into the open air. This provision shall not apply to the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers. [District Rule 4653, 5.5.5] Federally Enforceable Through Title V Permit
16. Permittee shall not use VOC-containing materials to clean adhesive application equipment, unless an enclosed system or equipment that is proven to equally effective at controlling emissions is used for cleaning. If an enclosed system is used, it must totally enclose spray guns, cups, nozzles, bowls, and other parts during washing, rinsing and draining procedures, and it must be used according to the manufacturer's recommendations and must be closed when not in use. [District Rule 4653, 5.5.6] Federally Enforceable Through Title V Permit
17. Permittee shall store or dispose of adhesives, catalysts, thinners, cleaning materials, fresh or spent solvents, and waste solvent materials such as cloth, paper, etc., in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. The containers used for disposal of adhesive materials, solvents, or any unused VOC containing materials shall be self-closing. [District Rule 4653, 5.6] Federally Enforceable Through Title V Permit
18. The permittee shall implement the following work practices when participating in organic solvent cleaning activities: 1) minimize spills of VOC-containing cleaning materials, 2) convey VOC-containing cleaning materials from one location to another in closed containers or pipes, and 3) minimize VOC emissions from cleaning of application, storage, mixing, and conveying equipment by ensuring that the equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers. [District Rule 4653, 5.7] Federally Enforceable Through Title V Permit
19. Each container of adhesive product subject to this rule shall display the maximum VOC content of the adhesive product as applied. The VOC content shall be displayed as grams of VOC per liter of adhesive product, excluding water and exempt compounds, or grams of VOC per liter of material for low-solids adhesive products. Each container of solvent subject to this rule shall display the maximum VOC content (in grams of VOC per liter of material) as applied. [District Rule 4653, 6.2.1] Federally Enforceable Through Title V Permit
20. Each container of adhesive product subject to this rule shall display a statement of the manufacturer's recommendations regarding thinning, reducing, or mixing of the adhesive product with any other VOC containing material. Mixing recommendations shall specify a ratio which results in a compliant, as applied, adhesive product. [District Rule 4653, 6.2.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

21. Permittee shall keep records of the daily VOC and PM10 emissions and cumulative annual (calendar year) VOC emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
22. The permittee shall maintain the following adhesives records on a daily basis: 1) the type and quantity of all adhesive materials used, 2) the VOC content, in grams VOC per liter, of all adhesive materials used, and 3) the VOC content of all solvents used and stored at the site. [District Rule 4653, 6.1.1] Federally Enforceable Through Title V Permit
23. The permittee shall maintain the following solvent cleaning records on a daily basis: 1) keep a copy of the manufacturer's product data sheet or material safety data sheet of the solvents used for cleaning activities, and 2) maintain a list of solvents that are being used that includes: a) the name of the solvent and it's manufacturer's name, b) the VOC content of the solvent expressed in grams/liter or lb/gallon, c) the VOC content of blended solvents, as applied, d) the type of cleaning activity for each solvent used, and e) the quantity of solvents used for cleaning operations. [District Rule 4653, 6.1.4] Federally Enforceable Through Title V Permit
24. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 1070, 2520, 9.4.2 and 4653, 6.1.5] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

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ATTACHMENT B

Previous Title V Operating Permit

San Joaquin Valley Air Pollution Control District

FACILITY: C-1074-0-2

EXPIRATION DATE: 04/30/2010

FACILITY-WIDE REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Facility-wide volatile organic compound (VOC) emissions shall be less than 50,000 lb/year. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
4. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
5. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
6. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (3/21/02). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
7. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.12.1] Federally Enforceable Through Title V Permit
8. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
9. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
10. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name: SANGER BOATS, INC.
Location: 3316 E ANNADALE AVE, FRESNO, CA 93725
C-1074-0-2 : Oct 20 2010 12:05PM - AHMADS

11. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
12. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
13. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
14. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
15. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
16. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
17. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
18. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
19. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
22. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
23. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

24. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (11/15/01). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
25. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in the Table of Standards of District Rule 4601 (10/31/01) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
26. All VOC-containing materials for architectural coatings subject to Rule 4601 (10/31/01) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
27. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (10/31/01). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
28. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
29. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
30. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR 82, Subpart B. [40 CFR 82, Subpart B] Federally Enforceable Through Title V Permit
31. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8021 and 8011] Federally Enforceable Through Title V Permit
32. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8031 and 8011] Federally Enforceable Through Title V Permit
33. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8041 and 8011] Federally Enforceable Through Title V Permit
34. Whenever open areas are disturbed or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8051 and 8011] Federally Enforceable Through Title V Permit
35. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8061 and Rule 8011] Federally Enforceable Through Title V Permit
36. Any unpaved vehicle/equipment area that anticipates more than 75 vehicle trips per day shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 100 vehicle trips per day shall comply with the requirements of Section 5.1.2 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8071 and Rule 8011] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

37. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit
38. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
39. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
40. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
41. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), and Rule 111 (Kern, Tulare, Kings). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
42. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (11/15/01); 4601, sections 5.1, 5.2, 5.3, 5.8 and 8.0 (10/31/01); 8021 (11/15/01); 8031 (11/15/01); 8041 (11/15/01); 8051 (11/15/01); 8061 (11/15/01); and 8071 (11/15/01). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
43. Permittee shall demonstrate compliance with the organic Hazardous Air Pollutant (HAP) emission limit requirements of 40 CFR 63, Subpart VVVV (National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing) using the compliant materials option or the emissions averaging option. Compliance using either option shall be demonstrated on a 12-month rolling-average basis and shall be determined at the end of every month (12 times per year). The first 12 month period begins on August 23, 2004. [40 CFR 63.5701, 40 CFR 63.5710(a) and 40 CFR 63.5713(a)] Federally Enforceable Through Title V Permit
44. While using the compliant materials option, the organic HAP content limits, by weight, are listed as follows: Production resin applied with atomization - 28%; Production resin applied with nonatomization - 35%; pigmented gel coat applied with any method - 33%; clear gel coat applied with any method - 48%; tooling resin applied with atomization - 30%; tooling resin applied with nonatomization - 39%; or tooling gel coat applied with any method - 40%. [40 CFR 63.5713(a)] Federally Enforceable Through Title V Permit
45. While using the compliant materials option, compliance shall be demonstrated if each of the resins and gel coats used by a facility have organic HAP contents no greater than the applicable organic HAP content limits specified above. If any of the resins or gel coats used by a facility have organic HAP contents greater than the applicable organic HAP content limits specified above, the permittee shall demonstrate compliance for that specific gel coat or resin category by using Equation 1 of 40 CFR 63.5713(c): Weighted-Average HAP Content (%) = [summation of (Mi x HAPi)] / [summation of Mi], where Mi = mass of open molding resin or gel used in the past 12 months, in megagrams; and HAPi = the organic HAP content, by weight percent, of each open molding resin or gel coat used in the past 12 months. If the weighted-average HAP content exceeds the applicable organic HAP content limits specified above, compliance has not been demonstrated using the compliant materials option. [40 CFR 63.5713] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

46. While using the emissions averaging option, the permittee shall use Equation 1 of 40 CFR 63.5710(b) to demonstrate that the organic HAP emissions from this facility do not exceed the organic HAP emission limit determined by Equation 1 of 40 CFR 63.5698(b), for the same 12-month period. If the result of Equation 1 of 40 CFR 63.5710(b) is greater than the result of Equation 1 of 40 CFR 63.5698(b), compliance has not been demonstrated using the emissions averaging option. [40 CFR 63.5710(b)] Federally Enforceable Through Title V Permit
47. While using the emissions averaging option, the organic HAP emissions from this facility shall not exceed the limit established by Equation 1 of 40 CFR 63.5698(b): $HAP\ Limit = [(46 \times Mr) + (159 \times Mpg) + (291 \times Mcg) + (54 \times Mtr) + (214 \times Mtg)]$, where Mr = mass of production resins used in the past 12 months; Mpg = mass of pigmented gel coats used in the past 12 months; Mcg = mass of clear gel coats used in the past 12 months; Mtr = mass of tooling resins used in the past 12 months; and Mtg = mass of tooling gel coats used in the past 12 months. All units are in megagrams. [40 CFR 63.5698(b)] Federally Enforceable Through Title V Permit
48. While using the emissions averaging option, the permittee shall calculate actual HAP emissions from the preceding 12 months using Equation 1 of 40 CFR 63.5710(b): $Actual\ HAP\ Emissions = (PVr \times Mr) + (PVpg \times Mpg) + (PVcg \times Mcg) + (PVtr \times Mtr) + (PVtg \times Mtg)$, where PVr = weighted-average MACT model point value for production resin used in the past 12 months; Mr = mass of production resin used in the past 12 months; PVpg = weighted-average MACT model point value for pigmented gel coat used in the past 12 months; Mpg = mass of pigmented gel coats used in the past 12 months; PVcg = weighted-average MACT model point value for clear gel coat used in the past 12 months; Mcg = mass of clear gel coats used in the past 12 months; PVtr = weighted-average MACT model point value for tooling resin used in the past 12 months; Mtr = mass of tooling resins used in the past 12 months; PVtg = weighted-average MACT model point value for tooling gel coat used in the past 12 months; and Mtg = mass of tooling gel coats used in the past 12 months. All mass units are in megagrams and all weighted-average MACT model point values are in kilograms per megagram. [40 CFR 63.5710(b)] Federally Enforceable Through Title V Permit
49. While using the emissions averaging option, the weighted-average MACT point values for each resin or gel coat used by this facility shall be determined using Equation 2 of 40 CFR 63.5710(c): $Weighted-Average\ MACT\ Point\ Value\ (PVr, PVpg, PVcg, PVtr\ and\ PVtg) = [\text{summation of } (Mi \times PVi)] / [\text{summation of } Mi]$, where Mi = mass of each resin or gel coat used within the past 12 months, in megagrams; and PVi = MACT model point value for each resin or gel coat used within the past 12 months, in kilograms of HAP per megagram of material applied. [40 CFR 63.5710(c)] Federally Enforceable Through Title V Permit
50. While using the emissions averaging option, the MACT model point values for all resins and gel coats applied shall be determined using the formulas listed in Table 3 of 40 CFR 63, Subpart VVVV: atomized resin - $[0.014 \times (\text{Resin HAP}\%, \text{ by weight})^{2.425}]$; atomized resin, plus vacuum bagging with roll out - $[0.01185 \times (\text{Resin HAP}\%, \text{ by weight})^{2.425}]$; atomized resin, plus vacuum bagging without roll out - $[0.00945 \times (\text{Resin HAP}\%, \text{ by weight})^{2.425}]$; nonatomized resin - $[0.014 \times (\text{Resin HAP}\%, \text{ by weight})^{2.275}]$; nonatomized resin, plus bagging with roll out - $[0.0110 \times (\text{Resin HAP}\%, \text{ by weight})^{2.275}]$; nonatomized resin, plus bagging without roll out - $[0.0076 \times (\text{Resin HAP}\%, \text{ by weight})^{2.275}]$. [40 CFR 63.5710(d)] Federally Enforceable Through Title V Permit
51. All gel coat and resin mixing containers with a capacity equal to or greater than 55 gallons, including those used for on-site mixing of putties and polyputties shall have a cover. The covers shall have no visible gaps and shall be in place at all times, except when material is being manually added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container. [40 CFR 63.5731(a)(b)] Federally Enforceable Through Title V Permit
52. For routine flushing or resin and gel coat application equipment (e.g. spray guns, flowcoaters, brushes, rollers, and squeegees), permittee shall use cleaning solvents that contain no more than 5% organic HAP, by weight. For removal of cured resin and gel coat from application equipment, no organic HAP content limit applies. [40 CFR 63.5734(a)] Federally Enforceable Through Title V Permit
53. Organic HAP-containing solvents used for removing cured resin or gel coat shall be stored in containers with covers. The covers must have no visible gaps and shall be in place at all times, except when equipment to be cleaned is placed in or removed from the container. On containers with a capacity greater than 2 gallons, the distance from the top of the container to the solvent surface must be equal to or greater than 0.75 times the diameter of the container. [40 CFR 63.5734(b)] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

54. At least once per month, 55 gallon or greater mixing containers and all containers holding organic HAP containing solvents used for removing cured resin or gel coat must be inspected to ensure the covers have no visible gaps. Records of the inspections and any repairs made to the covers must be kept. [40 CFR 63.5731(c)(d) and 63.5737(c)] Federally Enforceable Through Title V Permit
55. Permittee shall use adhesives that contain no more than 5% by weight of organic HAP content for all carpet and fabric operations. [40 CFR 63.5740(a)] Federally Enforceable Through Title V Permit
56. Permittee shall maintain a record of the organic HAP content of cleaning solvents used for routine cleaning of resin and gel coat application equipment and adhesives used for all carpet and fabric operations. [40 CFR 63.5737(a) and 63.5740(b)] Federally Enforceable Through Title V Permit
57. Permittee shall determine HAP content of affected materials using one or more of the methods outlined in 40 CFR 63.5758. [40 CFR 63.5758] Federally Enforceable Through Title V Permit
58. Permittee shall submit a notification of compliance status to the District no later than 30 days after the end of the first 12-month averaging period. The notification shall include the following: type and quantity of HAP's emitted at the facility; the method used to determine compliance; the method that will be used to determine continuing compliance; and a statement by the permittee as to whether the facility has complied with the HAP content limits. If there is a change to information submitted in the notification, changes shall be submitted in writing within 15 days after the change. [40 CFR 63.5761] Federally Enforceable Through Title V Permit
59. Permittee shall submit a compliance report to the District every 6 months. The first compliance report shall be submitted no later than 60 days after 12/31/05. Each subsequent report shall cover the applicable semiannual reporting period from January 1 through June 30 or from July 1 through December 31. Each subsequent compliance report shall be submitted no later than 60 days after the end of the semiannual reporting period. [40 CFR 63.5764(b)] Federally Enforceable Through Title V Permit
60. The compliance report shall include the following information: (1) Company name and address; (2) Signed and dated statement by a responsible official certifying the truth, accuracy, and completeness of the report; (3) Dates covered by the compliance report; (4) Description of any changes in the manufacturing process since the last compliance report; (5) Table or statement showing, for each regulated operation, the applicable organic HAP content limit and application equipment requirement with which the facility is complying and the actual weighted-average organic HAP content for each operation during each of the rolling 12-month averaging periods that end during the reporting period; (6) If compliance is achieved during the reporting period, a statement indicating such effect shall be included with the report; and (7) If any of the regulated operations were not in compliance during the reporting period, the following shall be included with the semiannual compliance report: (i) Operation(s) involved in the deviation; (ii) quantity, organic HAP content, and application method of the materials involved in the deviation; (iii) actions taken to minimize the deviation and to prevent it in the future; and (iv) Statement of whether or not the facility was in compliance for the 12-month averaging period that ended at the end of the reporting period. [40 CFR 63.5764(c)] Federally Enforceable Through Title V Permit
61. The following exemptions apply to the gel coat and resin operations: (1) Gel coat materials used for part/mold repair and touch up shall be exempt from the organic HAP content limits. The total gel coat materials used in this exemption shall not exceed 1 percent by weight of all gel coat used at the facility on a 12-month rolling-average basis. Records shall be kept of the amount of gel coats used per month for which this exemption is being used and copies of calculations showing that the exempt amount does not exceed 1 percent of all gel coat used. (2) Pure 100% vinylester resin used for skin coats. The total resin materials included in the exemption shall not exceed 5% by weight of all resin used at the facility on a 12-month rolling-average basis. Records shall be kept of the amount of 100 percent vinylester skin coat used per month for which this exemption is being used and copies of calculations showing that the exempt amount does not exceed 5% percent of all resin used. [40 CFR 63.5698(d)] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

62. Permittee shall maintain the following records, in addition to those records required by conditions of this permit: (1) a copy of each notification and report submitted to the District; (2) Support documentation for any notice or report submitted to the District; (3) Total amounts of each production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat used per month and the weighted-average organic HAP content for each category of material, expressed as weight percent (this record is not required if all materials used comply with the organic HAP content requirements); (4) for production resin and tooling resin the amounts of each applied by atomized or nonatomized methods. [40 CFR 63.5767] Federally Enforceable Through Title V Permit
63. On May 31, 2005, the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report are based upon this initial permit issuance date, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1074-1-4

EXPIRATION DATE: 04/30/2010

EQUIPMENT DESCRIPTION:

POLYESTER RESIN AND FIBERGLASS APPLICATION OPERATION TO HULL MOLDS FOR THE MANUFACTURE OF BOATS CONSISTING OF HVLP, NON-ATOMIZING FLOW COATER APPLICATOR(S), FIVE 1.5 HP EXHAUST FANS, ONE 7.5 HP EXHAUST FAN AND TWO 15 HP COMPRESSORS

PERMIT UNIT REQUIREMENTS

1. All exhaust fans shall be on prior to the start of and during polyester resin and fiberglass application. [District NSR Rule] Federally Enforceable Through Title V Permit
2. VOC emissions from this polyester resin application operation shall not exceed 77.0 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
3. VOC emissions from resins used shall be calculated as follows: Resin Usage (gal/day) x Density of Resin (lb/gal) x 1 ton/2000 lb x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table (lb/ton). [District NSR Rule] Federally Enforceable Through Title V Permit
4. The monomer (VOC) content of polyester resins used shall be less than or equal to 35%, by weight. [District NSR Rule and District Rule 4684, 5.1.1.1] Federally Enforceable Through Title V Permit
5. Application of any polyester resin material shall only be performed by one of the following methods: 1) non-atomized spray technique; 2) flowcoaters; 3) pressure-fed rollers; 4) resin impregnators; 5) hand layup; or 6) any equivalent method as approved by the APCO. [District NSR Rule and District Rule 4684] Federally Enforceable Through Title V Permit
6. Permittee shall not use organic solvents for cleaning operations that contain VOC's in excess of any of the following limits (except when one or more of the application methods described in the following condition is utilized): product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal), repair and maintenance cleaning: 50 g/l (0.42 lb/gal), and cleaning of polyester resin application equipment: 50 g/l (0.42 lb/gal). [District Rule 4684, 5.4.3] Federally Enforceable Through Title V Permit
7. Cleaning activities that use solvents containing more than 50 grams of VOC per liter of material shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; non-atomized solvent flow method in which 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 solvent flushing method in which the cleaning solvent is discharged into a container that 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. [District Rule 4684 5.4.6] Federally Enforceable Through Title V Permit
8. Permittee shall not use VOC-containing materials to clean spray equipment used for the application of coatings unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning. If an enclosed system is used, it must totally enclose spray guns, caps, nozzles, bowls, and other parts during washing, rinsing and draining procedures, and it must be used according to the manufacturer's recommendations and must be closed when not in use. [District Rule 4684, 5.4.8] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

9. Permittee shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in self-closing, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4684, 5.4.9] Federally Enforceable Through Title V Permit
10. Permittee shall keep records of the daily and cumulative annual (calendar year) VOC emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Permittee shall maintain the following records: daily records of the type, quantity, density and solids content of all coatings, resins, catalysts, and cleaning materials used in each operation; records of the VOC content, in weight percent, of all polyester resin materials used or stored at the facility; records of the VOC content of all cleaning materials used and stored at the facility. [District Rules 2520, 9.4.2 and 4684, 6.1.1] Federally Enforceable Through Title V Permit
12. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2520, 9.4.2 and 4684, 6.1.3] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1074-2-3

EXPIRATION DATE: 04/30/2010

EQUIPMENT DESCRIPTION:

POLYESTER GEL COAT APPLICATION OPERATION TO MOLDS CONSISTING OF HVLP AND AIR-ASSISTED AIRLESS SPRAY GUNS, A 14'W X 26'L X 9'H DEVLBISS SPRAY BOOTH (BOOTH #1), 14 (20" X 20") FILTERS, AND A 2 HP EXHAUST FAN

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. All filters shall be properly maintained and must be in place during the gel coat operation. [District Rule 4102]
3. VOC emissions from this gel coat application operation shall not exceed 20.2 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
4. VOC's from gelcoats shall be calculated as follows: Gelcoat Usage (gal/day) x Density of gelcoat (lb/gal) x 1 ton/2000 lb x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table for styrene + Gelcoat usage (gal/day) x Density of gelcoat (lb/gal) x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table for MMA. [District NSR Rule] Federally Enforceable Through Title V Permit
5. PM10 emissions from this gel coat application operation shall not exceed 15.8 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
6. PM10 emissions from gelcoats used shall be calculated as follows: Gelcoat Usage (gal/day) x Density of Gelcoat (lb/gal) x Solids Content (% by weight) x 0.187. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The monomer content of polyester materials used at this facility shall be equal to or less than the following: for polyester resins, 35% by weight; for pigmented gel coats, 45% by weight; for specialty resins and clear gel coats, 50% by weight. [District Rule 4684, 5.1.1.1] Federally Enforceable Through Title V Permit
8. Spray application of polyester resin shall only be performed using airless, air assisted airless, high-volume low-pressure (HVLP) spray equipment, or electrostatic spray equipment. [District Rule 4684 5.1.2] Federally Enforceable Through Title V Permit
9. High-Volume, Low-Pressure (HVLP) spray equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4684, 5.1.2.1] Federally Enforceable Through Title V Permit
10. For HVLP spray guns manufactured prior to January 1, 1996, the end user shall demonstrate that the gun meets HVLP spray equipment standards, Satisfactory proof will be either in the form of manufacturer's published material or by a demonstration using a certified air pressure tip gauge, measuring the air atomizing pressure dynamically at the center of the air cap and at the air horns. [District Rule 4684, 5.1.2.2] Federally Enforceable Through Title V Permit
11. Permittee shall not use organic solvents for cleaning operations that contain VOC's in excess of any of the following limits (except when one or more of the application methods described in the following condition is utilized): product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal), repair and maintenance cleaning: 50 g/l (0.42 lb/gal), and cleaning of polyester resin application equipment: 50 g/l (0.42 lb/gal). [District Rule 4684, 5.4.3] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

12. Cleaning activities that use solvents containing more than 50 grams of VOC per liter of material shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; non-atomized solvent flow method in which 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 solvent flushing method in which the cleaning solvent is discharged into a container that 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. [District Rule 4684 5.4.6] Federally Enforceable Through Title V Permit
13. Permittee shall not use VOC-containing materials to clean spray equipment used for the application of coatings unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning. If an enclosed system is used, it must totally enclose spray guns, caps, nozzles, bowls, and other parts during washing, rinsing and draining procedures, and it must be used according to the manufacturer's recommendations and must be closed when not in use. [District Rule 4684, 5.4.8] Federally Enforceable Through Title V Permit
14. Permittee shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in self-closing, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4684, 5.4.9] Federally Enforceable Through Title V Permit
15. Permittee shall keep records of the daily VOC and PM10 emissions and cumulative annual (calendar year) VOC emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Permittee shall maintain the following records: daily records of the type and quantity of all coatings, resins, catalysts, and cleaning materials used in each operation; records of the VOC content, in weight percent, of all polyester resin materials used or stored at the facility; records of the VOC content of all cleaning materials used and stored at the facility. [District Rule 4684, 6.1.1] Federally Enforceable Through Title V Permit
17. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2520, 9.4.2 and 4684, 6.1.3] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1074-3-3

EXPIRATION DATE: 04/30/2010

EQUIPMENT DESCRIPTION:

POLYESTER RESIN AND FIBERGLASS APPLICATION OPERATION TO MOLDS CONSISTING OF HVLP, NON-ATOMIZING FLOW COATER APPLICATOR(S), A 12'W X 10'L X 8'H SPRAY BOOTH (BOOTH #2), 28 (20" X 20") FILTERS AND A 2 HP EXHAUST FAN

PERMIT UNIT REQUIREMENTS

1. All filters shall be properly maintained and must be in place during the resin operation. [District Rule 4102]
2. VOC emissions from this polyester resin and fiberglass application operation shall not exceed 25.8 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
3. VOC emissions from resins used shall be calculated as follows: Resin Usage (gal/day) x Density of Resin (lb/gal) x 1 ton/2000 lb x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table (lb/ton). [District NSR Rule] Federally Enforceable Through Title V Permit
4. The monomer content of polyester materials used at this facility shall be equal to or less than the following: for polyester resins, 35% by weight; for pigmented gel coats, 45% by weight; for specialty resins and clear gel coats, 50% by weight. [District Rule 4684, 5.1.1.1] Federally Enforceable Through Title V Permit
5. Spray application of polyester resin shall only be performed using airless, air assisted airless, high-volume low-pressure (HVLP) spray equipment, or electrostatic spray equipment. [District Rule 4684 5.1.2] Federally Enforceable Through Title V Permit
6. High-Volume, Low-Pressure (HVLP) spray equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4684, 5.1.2.1] Federally Enforceable Through Title V Permit
7. For HVLP spray guns manufactured prior to January 1, 1996, the end user shall demonstrate that the gun meets HVLP spray equipment standards, Satisfactory proof will be either in the form of manufacturer's published material or by a demonstration using a certified air pressure tip gauge, measuring the air atomizing pressure dynamically at the center of the air cap and at the air horns. [District Rule 4684, 5.1.2.2] Federally Enforceable Through Title V Permit
8. Permittee shall not use organic solvents for cleaning operations that contain VOC's in excess of any of the following limits (except when one or more of the application methods described in the following condition is utilized): product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal), repair and maintenance cleaning: 50 g/l (0.42 lb/gal), and cleaning of polyester resin application equipment: 50 g/l (0.42 lb/gal). [District Rule 4684, 5.4.3] Federally Enforceable Through Title V Permit
9. Cleaning activities that use solvents containing more than 50 grams of VOC per liter of material shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; non-atomized solvent flow method in which 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 solvent flushing method in which the cleaning solvent is discharged into a container that 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. [District Rule 4684 5.4.6] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

10. Permittee shall not use VOC-containing materials to clean spray equipment used for the application of coatings unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning. If an enclosed system is used, it must totally enclose spray guns, caps, nozzles, bowls, and other parts during washing, rinsing and draining procedures, and it must be used according to the manufacturer's recommendations and must be closed when not in use. [District Rule 4684, 5.4.8] Federally Enforceable Through Title V Permit
11. Permittee shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in self-closing, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4684, 5.4.9] Federally Enforceable Through Title V Permit
12. Permittee shall keep records of the daily and cumulative annual (calendar year) VOC emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
13. Permittee shall maintain the following records: daily records of the type and quantity of all coatings, resins, catalysts, and cleaning materials used in each operation; records of the VOC content, in weight percent, of all polyester resin materials used or stored at the facility; records of the VOC content of all cleaning materials used and stored at the facility. [District Rule 4684, 6.1.1] Federally Enforceable Through Title V Permit
14. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2520, 9.4.2 and 4684, 6.1.3] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1074-4-3

EXPIRATION DATE: 04/30/2010

EQUIPMENT DESCRIPTION:

POLYESTER GEL COAT APPLICATION OPERATION TO MOLDS CONSISTING OF HVLP AND AIR-ASSISTED AIRLESS SPRAY GUNS, A 13'W X 15'L X 10'H SPRAY KING 200 SPRAY/TOOLING BOOTH (BOOTH #5), 18 (20" X 20") FILTERS AND A 2 HP EXHAUST FAN

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. All filters shall be properly maintained and must be in place during the resin and gel coat operations. [District Rule 4102]
3. VOC emissions from this resin and gel coat application operation shall not exceed 14.2 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
4. VOC emissions from resins used shall be calculated as follows: Resin Usage (gal/day) x Density of Resin (lb/gal) x 1 ton/2000 lb x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table (lb/ton). [District NSR Rule] Federally Enforceable Through Title V Permit
5. VOC emissions from gelcoats used shall be calculated as follows: Gelcoat Usage (gal/day) x Density of Gelcoat (lb/gal) x 1 ton/2000 lb x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table for styrene + Gelcoat Usage (gal/day) x Density of Gelcoat (lb/gal) x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table for MMA. [District NSR Rule] Federally Enforceable Through Title V Permit
6. PM10 emissions from this resin and gel coat application operation shall not exceed 7.6 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
7. PM10 emissions from gelcoats used shall be calculated as follows: Gelcoat Usage (gal/day) x Density of Gelcoat (lb/gal) x Solids Content (% by weight) x 0.187. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The monomer content of polyester materials used at this facility shall be equal to or less than the following: for polyester resins, 35% by weight; for pigmented gel coats, 45% by weight; for specialty resins and clear gel coats, 50% by weight. [District Rule 4684, 5.1.1.1] Federally Enforceable Through Title V Permit
9. Spray application of polyester resin shall only be performed using airless, air assisted airless, high-volume low-pressure (HVLP) spray equipment, or electrostatic spray equipment. [District Rule 4684 5.1.2] Federally Enforceable Through Title V Permit
10. High-Volume, Low-Pressure (HVLP) spray equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4684, 5.1.2.1] Federally Enforceable Through Title V Permit
11. For HVLP spray guns manufactured prior to January 1, 1996, the end user shall demonstrate that the gun meets HVLP spray equipment standards, Satisfactory proof will be either in the form of manufacturer's published material or by a demonstration using a certified air pressure tip gauge, measuring the air atomizing pressure dynamically at the center of the air cap and at the air horns. [District Rule 4684, 5.1.2.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

12. Permittee shall not use organic solvents for cleaning operations that contain VOC's in excess of any of the following limits (except when one or more of the application methods described in the following condition is utilized): product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal), repair and maintenance cleaning: 50 g/l (0.42 lb/gal), and cleaning of polyester resin application equipment: 50 g/l (0.42 lb/gal). [District Rule 4684, 5.4.3] Federally Enforceable Through Title V Permit
13. Cleaning activities that use solvents containing more than 50 grams of VOC per liter of material shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; non-atomized solvent flow method in which 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 solvent flushing method in which the cleaning solvent is discharged into a container that 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. [District Rule 4684 5.4.6] Federally Enforceable Through Title V Permit
14. Permittee shall not use VOC-containing materials to clean spray equipment used for the application of coatings unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning. If an enclosed system is used, it must totally enclose spray guns, caps, nozzles, bowls, and other parts during washing, rinsing and draining procedures, and it must be used according to the manufacturer's recommendations and must be closed when not in use. [District Rule 4684, 5.4.8] Federally Enforceable Through Title V Permit
15. Permittee shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in self-closing, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4684, 5.4.9] Federally Enforceable Through Title V Permit
16. Permittee shall keep records of the daily VOC and PM10 emissions and cumulative annual (calendar year) VOC emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Permittee shall maintain the following records: daily records of the type and quantity of all coatings, resins, catalysts, and cleaning materials used in each operation; records of the VOC content, in weight percent, of all polyester resin materials used or stored at the facility; records of the VOC content of all cleaning materials used and stored at the facility. [District Rule 4684, 6.1.1] Federally Enforceable Through Title V Permit
18. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2520, 9.4.2 and 4684, 6.1.3] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1074-5-1

EXPIRATION DATE: 04/30/2010

EQUIPMENT DESCRIPTION:

WOOD AND FIBERGLASS TRIM GRINDING OPERATION CONSISTING OF A 12'W X 24'L X 9'H PARTS GRINDING BOOTH (BOOTH #3), 20 (20" X 20") FILTERS AND A 2 HP EXHAUST FAN

PERMIT UNIT REQUIREMENTS

1. All filters shall be properly maintained and must be in place during the grinding operation. [District Rule 4102]
2. All equipment or systems installed or used to achieve compliance with the terms and conditions of this permit shall be maintained in good working order and be operated as efficiently as possible to minimize air pollution emissions. [District Rule 4102]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1074-6-1

EXPIRATION DATE: 04/30/2010

EQUIPMENT DESCRIPTION:

WOOD AND FIBERGLASS TRIM GRINDING OPERATION CONSISTING OF A 14'W X 48'L X 10'H SPRAY KING 200 GRINDING BOOTH (BOOTH #4), 18 (20" X 20") FILTERS AND A 2 HP EXHAUST FAN

PERMIT UNIT REQUIREMENTS

1. All filters shall be properly maintained and must be in place during the grinding operation. [District Rule 4102]
2. All equipment or systems installed or used to achieve compliance with the terms and conditions of this permit shall be maintained in good working order and be operated as efficiently as possible to minimize air pollution emissions. [District Rule 4102]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1074-7-3

EXPIRATION DATE: 04/30/2010

EQUIPMENT DESCRIPTION:

POLYESTER GEL COAT APPLICATION OPERATION TO MOLDS AND PATTERNS CONSISTING OF HVLP AND AIR-ASSISTED AIRLESS SPRAY GUNS, A 14'W X 26'L X 9'H DEVILBISS SPRAY BOOTH (BOOTH #6), 12 (24" X 20") FILTERS AND A 2 HP EXHAUST FAN

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. All filters shall be properly maintained and must be in place during the gel coat operation. [District Rule 4102]
3. VOC emissions from this gel coat application operation shall not exceed 97.6 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
4. VOC emissions from gelcoats used shall be calculated as follows: Gelcoat Usage (gal/day) x Density of Gelcoat (lb/gal) x 1 ton/2000 lb x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table for styrene + Gelcoat Usage (gal/day) x Density of Gelcoat (lb/gal) x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table for MMA. [District NSR Rule] Federally Enforceable Through Title V Permit
5. PM10 emissions from this resin and gel coat application operation shall not exceed 79.4 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
6. PM10 emissions from gelcoats used shall be calculated as follows: Gelcoat Usage (gal/day) x Density of Gelcoat (lb/gal) x Solids Content (% by weight) x 0.187. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The monomer content of polyester materials used at this facility shall be equal to or less than the following: for polyester resins, 35% by weight; for pigmented gel coats, 45% by weight; for specialty resins and clear gel coats, 50% by weight. [District Rule 4684, 5.1.1.1] Federally Enforceable Through Title V Permit
8. Spray application of polyester resin shall only be performed using airless, air assisted airless, high-volume low-pressure (HVLP) spray equipment, or electrostatic spray equipment. [District Rule 4684 5.1.2] Federally Enforceable Through Title V Permit
9. High-Volume, Low-Pressure (HVLP) spray equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4684, 5.1.2.1] Federally Enforceable Through Title V Permit
10. For HVLP spray guns manufactured prior to January 1, 1996, the end user shall demonstrate that the gun meets HVLP spray equipment standards. Satisfactory proof will be either in the form of manufacturer's published material or by a demonstration using a certified air pressure tip gauge, measuring the air atomizing pressure dynamically at the center of the air cap and at the air horns. [District Rule 4684, 5.1.2.2] Federally Enforceable Through Title V Permit
11. Permittee shall not use organic solvents for cleaning operations that contain VOC's in excess of any of the following limits (except when one or more of the application methods described in the following condition is utilized): product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal), repair and maintenance cleaning: 50 g/l (0.42 lb/gal), and cleaning of polyester resin application equipment: 50 g/l (0.42 lb/gal). [District Rule 4684, 5.4.3] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

12. Cleaning activities that use solvents containing more than 50 grams of VOC per liter of material shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; non-atomized solvent flow method in which 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 solvent flushing method in which the cleaning solvent is discharged into a container that 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. [District Rule 4684 5.4.6] Federally Enforceable Through Title V Permit
13. Permittee shall not use VOC-containing materials to clean spray equipment used for the application of coatings unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning. If an enclosed system is used, it must totally enclose spray guns, caps, nozzles, bowls, and other parts during washing, rinsing and draining procedures, and it must be used according to the manufacturer's recommendations and must be closed when not in use. [District Rule 4684, 5.4.8] Federally Enforceable Through Title V Permit
14. Permittee shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in self-closing, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4684, 5.4.9] Federally Enforceable Through Title V Permit
15. Permittee shall keep records of the daily VOC and PM10 emissions and cumulative annual (calendar year) VOC emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Permittee shall maintain the following records: daily records of the type and quantity of all coatings, resins, catalysts, and cleaning materials used in each operation; records of the VOC content, in weight percent, of all polyester resin materials used or stored at the facility; records of the VOC content of all cleaning materials used and stored at the facility. [District Rule 4684, 6.1.1] Federally Enforceable Through Title V Permit
17. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2520, 9.4.2 and 4684, 6.1.3] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1074-8-3

EXPIRATION DATE: 04/30/2010

EQUIPMENT DESCRIPTION:

POLYESTER GEL COAT APPLICATION OPERATION TO MOLDS AND PATTERNS CONSISTING OF HVLP AND AIR-ASSISTED AIRLESS SPRAY GUNS, A 14'W X 26'L X 9'H DEVILBISS SPRAY BOOTH (BOOTH #7), 12 (24" X 20") FILTERS AND A 2 HP EXHAUST FAN

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. All filters shall be properly maintained and must be in place during the gel coat operation. [District Rule 4102]
3. VOC emissions from this gel coat application operation shall not exceed 97.6 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
4. VOC emissions from gelcoats used shall be calculated as follows: Gelcoat Usage (gal/day) x Density of Gelcoat (lb/gal) x 1 ton/2000 lb x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table for styrene + Gelcoat usage (gal/day) x Density of gelcoat (lb/gal) x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table for MMA. [District NSR Rule] Federally Enforceable Through Title V Permit
5. PM10 emissions from this resin and gel coat application operation shall not exceed 79.4 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
6. PM10 emissions from gelcoats used shall be calculated as follows: Gelcoat Usage (gal/day) x Density of Gel Coat (lb/gal) x Solids Content (% by weight) x 0.187. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The monomer content of polyester materials used at this facility shall be equal to or less than the following: for polyester resins, 35% by weight; for pigmented gel coats, 45% by weight; for specialty resins and clear gel coats, 50% by weight. [District Rule 4684, 5.1.1.1] Federally Enforceable Through Title V Permit
8. Spray application of polyester resin shall only be performed using airless, air assisted airless, high-volume low-pressure (HVLP) spray equipment, or electrostatic spray equipment. [District Rule 4684 5.1.2] Federally Enforceable Through Title V Permit
9. High-Volume, Low-Pressure (HVLP) spray equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4684, 5.1.2.1] Federally Enforceable Through Title V Permit
10. For HVLP spray guns manufactured prior to January 1, 1996, the end user shall demonstrate that the gun meets HVLP spray equipment standards, Satisfactory proof will be either in the form of manufacturer's published material or by a demonstration using a certified air pressure tip gauge, measuring the air atomizing pressure dynamically at the center of the air cap and at the air horns. [District Rule 4684, 5.1.2.2] Federally Enforceable Through Title V Permit
11. Permittee shall not use organic solvents for cleaning operations that contain VOC's in excess of any of the following limits (except when one or more of the application methods described in the following condition is utilized): product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal), repair and maintenance cleaning: 50 g/l (0.42 lb/gal), and cleaning of polyester resin application equipment: 50 g/l (0.42 lb/gal). [District Rule 4684, 5.4.3] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

12. Cleaning activities that use solvents containing more than 50 grams of VOC per liter of material shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; non-atomized solvent flow method in which 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 solvent flushing method in which the cleaning solvent is discharged into a container that 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. [District Rule 4684 5.4.6] Federally Enforceable Through Title V Permit
13. Permittee shall not use VOC-containing materials to clean spray equipment used for the application of coatings unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning. If an enclosed system is used, it must totally enclose spray guns, caps, nozzles, bowls, and other parts during washing, rinsing and draining procedures, and it must be used according to the manufacturer's recommendations and must be closed when not in use. [District Rule 4684, 5.4.8] Federally Enforceable Through Title V Permit
14. Permittee shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in self-closing, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4684, 5.4.9] Federally Enforceable Through Title V Permit
15. Permittee shall keep records of the daily VOC and PM10 emissions and cumulative annual (calendar year) VOC emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Permittee shall maintain the following records: daily records of the type and quantity of all coatings, resins, catalysts, and cleaning materials used in each operation; records of the VOC content, in weight percent, of all polyester resin materials used or stored at the facility; records of the VOC content of all cleaning materials used and stored at the facility. [District Rule 4684, 6.1.1] Federally Enforceable Through Title V Permit
17. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2520, 9.4.2 and 4684, 6.1.3] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1074-9-3

EXPIRATION DATE: 04/30/2010

EQUIPMENT DESCRIPTION:

POLYESTER RESIN APPLICATION OPERATION TO WOOD COMPONENTS CONSISTING OF A 14'W X 26'L X 9'H DEVILBISS SPRAY BOOTH (BOOTH #8), 14 (20" X 20") FILTERS AND A 2 HP EXHAUST FAN

PERMIT UNIT REQUIREMENTS

1. All filters shall be properly maintained and must be in place during the resin operation. [District Rule 4102]
2. VOC emissions from this polyester resin application operation shall not exceed 5.0 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
3. VOC emissions from resins used shall be calculated as follows: Resin Usage (gal/day) x Density of Resin (lb/gal) x 1 ton/2000 lb x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table (lb/ton). [District NSR Rule] Federally Enforceable Through Title V Permit
4. The monomer content of polyester materials used at this facility shall be equal to or less than the following: for polyester resins, 35% by weight; for pigmented gel coats, 45% by weight; for specialty resins and clear gel coats, 50% by weight. [District Rule 4684, 5.1.1.1] Federally Enforceable Through Title V Permit
5. Spray application of polyester resin shall only be performed using airless, air assisted airless, high-volume low-pressure (HVLP) spray equipment, or electrostatic spray equipment. [District Rule 4684 5.1.2] Federally Enforceable Through Title V Permit
6. High-Volume, Low-Pressure (HVLP) spray equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4684, 5.1.2.1] Federally Enforceable Through Title V Permit
7. For HVLP spray guns manufactured prior to January 1, 1996, the end user shall demonstrate that the gun meets HVLP spray equipment standards, Satisfactory proof will be either in the form of manufacturer's published material or by a demonstration using a certified air pressure tip gauge, measuring the air atomizing pressure dynamically at the center of the air cap and at the air horns. [District Rule 4684, 5.1.2.2] Federally Enforceable Through Title V Permit
8. Permittee shall not use organic solvents for cleaning operations that contain VOC's in excess of any of the following limits (except when one or more of the application methods described in the following condition is utilized): product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal), repair and maintenance cleaning: 50 g/l (0.42 lb/gal), and cleaning of polyester resin application equipment: 50 g/l (0.42 lb/gal). [District Rule 4684, 5.4.3] Federally Enforceable Through Title V Permit
9. Cleaning activities that use solvents containing more than 50 grams of VOC per liter of material shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; non-atomized solvent flow method in which 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 solvent flushing method in which the cleaning solvent is discharged into a container that 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. [District Rule 4684 5.4.6] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

10. Permittee shall not use VOC-containing materials to clean spray equipment used for the application of coatings unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning. If an enclosed system is used, it must totally enclose spray guns, caps, nozzles, bowls, and other parts during washing, rinsing and draining procedures, and it must be used according to the manufacturer's recommendations and must be closed when not in use. [District Rule 4684, 5.4.8] Federally Enforceable Through Title V Permit
11. Permittee shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in self-closing, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4684, 5.4.9] Federally Enforceable Through Title V Permit
12. Permittee shall keep records of the daily and cumulative annual (calendar year) VOC emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
13. Permittee shall maintain the following records: daily records of the type and quantity of all coatings, resins, catalysts, and cleaning materials used in each operation; records of the VOC content, in weight percent, of all polyester resin materials used or stored at the facility; records of the VOC content of all cleaning materials used and stored at the facility. [District Rule 4684, 6.1.1] Federally Enforceable Through Title V Permit
14. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2520, 9.4.2 and 4684, 6.1.3] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1074-10-1

EXPIRATION DATE: 04/30/2010

EQUIPMENT DESCRIPTION:

A METAL CUTTING OPERATION WITH A BRILLIANT, MODEL BDM51, CUTTING SAW SERVED BY AN AERCOLOGY/DONALDSON, MODEL DM-1500 BAGHOUSE

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Visible emissions from the dust collector shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Visible emissions shall be inspected quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
4. Dust collection system shall be inspected annually, while in operation, for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
5. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
6. All filters shall be properly maintained and must be in place during the cutting operation. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Material removed from dust collector shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Filter media shall have a certified average control efficiency of 98.9% efficiency between 1 and 10 microns [District NSR Rule, District Rule 4102 and CH&SC 41700] Federally Enforceable Through Title V Permit
9. The quantity of material collected by dust collector shall not exceed 3.2 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Stainless Steel PM10 emission rate shall not exceed 0.78 lb/year. [District Rule 4102 and CH&SC 41700]
11. PM emission exhaust stack height will be at least 7.62 meter and exhaust flow shall not be impeded vertically upward. [District Rule 4102 and CH&SC 41700]
12. Records of the following shall be maintained: (a) Date Stainless Steel metal is cut; (b) Calculated weight of Stainless Steel metal removed by cutting per day in pounds; (c) Weight of material removed from the dust collector; (d) Cumulative days of cutting between material removal from dust collector. [District NSR Rule, District Rule 4102 and CH&SC 41700] Federally Enforceable Through Title V Permit
13. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1074-11-3

EXPIRATION DATE: 04/30/2010

EQUIPMENT DESCRIPTION:

WOODWORKING OPERATION WITH ONE (1) RADIAL ARM SAW, ONE (1) TABLE SAW, SERVED BY A 1,200 CFM LMC 160-IRI-A AND ONE (1) ROUTER SERVED BY A 6,000 CFM DUST TECHNOLOGY MODEL DT-150 DUST COLLECTOR

PERMIT UNIT REQUIREMENTS

1. PM10 emissions from the dust collectors shall not exceed 0.004 gr/dscf. [District NSR Rule and District Rule 4201] Federally Enforceable Through Title V Permit
2. Visible emissions from any dust collectors shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Visible emissions shall be inspected quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
4. Dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
5. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
6. The appropriate dust collector exhaust fan shall be switched on prior to the start-up of any woodworking equipment. [District NSR Rule] Federally Enforceable Through Title V Permit
7. All ducting and control equipment shall be in good working order to prevent fugitive particulate emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
8. All filters shall be properly maintained and must be in place during the woodworking operation(s). [District NSR Rule] Federally Enforceable Through Title V Permit
9. Each dust collector cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District NSR Rule] Federally Enforceable Through Title V Permit
10. At least one replacement filter for each dust collector shall be maintained on the premises. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Material removed from dust collectors shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
12. All material that becomes deposited on the ground or any part of the dust collection system as a result of collection or material removal shall be cleaned up immediately. [District NSR Rule] Federally Enforceable Through Title V Permit
13. Records of dust collector maintenance, inspections, and repairs shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: SANGER BOATS, INC.

Location: 3316 E ANNADALE AVE, FRESNO, CA 93725

C-1074-11-3: Oct 20 2010 12:06PM - AHMADS

14. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1074-12-3

EXPIRATION DATE: 04/30/2010

EQUIPMENT DESCRIPTION:

ADHESIVE OPERATION WITH A 15 HP COMPRESSOR AND HIGH VOLUME LOW PRESSURE (HVLP) SPRAY EQUIPMENT

PERMIT UNIT REQUIREMENTS

1. VOC emissions from this adhesive application operation shall not exceed 2.0 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
2. VOC emissions from adhesives used shall be calculated as follows: Adhesive Usage (gal/day) x VOC Content (lb/gal) x 0.25. [District NSR Rule] Federally Enforceable Through Title V Permit
3. PM10 emissions from the spray application of adhesive shall not exceed 3.7 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
4. PM10 emissions from adhesives used shall be calculated as follows: Adhesive Usage (gal/day) x Density of Adhesive (lb/gal) x Solids Content (% by weight) x 0.25. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The VOC content of adhesive products used for specific applications shall not exceed the following limits, expressed as grams of VOC per liter of adhesive product, excluding water and exempt compounds, or grams of VOC per liter of material for low-solids adhesive products, as applied, except where specified elsewhere in this permit: multipurpose construction, 200 g/l; floor covering installation, 150 g/l; ceramic tile installation, 130 g/l; perimeter bonded sheet flooring installation, 660 g/l; single-ply roof material installation, 250 g/l; structural glazing, 100 g/l; ABS welding adhesive, 400 g/l; CPVC welding adhesive, 490 g/l; PVC welding adhesive, 510 g/l; other plastic cement welding adhesive, 450 g/l; plastic cement welding adhesive primer, 650 g/l; adhesive primers, 250 g/l; staple and nail manufacturing 640 g/l; contact adhesive, 250 g/l; contact adhesive-specialty, 250 g/l; rubber vulcanization adhesive/primer, 850g/l; waterproof resorcinol glue, 170 g/l. [District Rule 4653, 5.1.1] Federally Enforceable Through Title V Permit
6. Only HVLP, electrostatic, airless, air-assisted airless, brush, dip, flow, or roll adhesive application equipment and disposable aerosol containers shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4653, 5.1.3] Federally Enforceable Through Title V Permit
7. 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 4653, 5.1.3] Federally Enforceable Through Title V Permit
8. Air-atomized spray shall only be used for the application of contact adhesives or specialty contact adhesives. [District Rule 4653, 5.1.3] Federally Enforceable Through Title V Permit
9. No owner or operator shall use organic solvents for cleaning operations that exceed the VOC content limits specified as follows: A) Product cleaning during manufacturing process or surface preparation for adhesive application; 1) general, 50 g/l (0.42 lb/gal) and 2) surface preparation prior to rubber vulcanization process, 850 g/l (7.1 lb/gal); B) repair and maintenance cleaning, 50 g/l (0.42 lb/gal); C) cleaning of adhesive application equipment, 550 g/l (4.6 lb/gal) [District Rule 4653, 5.3.3] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

10. Cleaning activities that use solvents with a VOC content greater than 50 g/l (0.42 lb/gallon) shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; non-atomized solvent flow method in which 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 solvent flushing method in which the cleaning solvent is discharged into a container that 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. [District Rule 4653, 5.3.5 and 5.3.6] Federally Enforceable Through Title V Permit
11. Solvent shall not be atomized into the open air unless it is vented to a VOC emission control system. This provision shall not apply to the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers described elsewhere in this permit. [District Rule 4653, 5.3.7] Federally Enforceable Through Title V Permit
12. The permittee shall not use materials with VOC content greater than 50 g/l (0.42 lb/gallon) for spray equipment clean-up unless an enclosed system, or equipment proven to be equally effective at controlling emissions, is used for cleaning. [District Rule 4653, 5.3.8] Federally Enforceable Through Title V Permit
13. 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 4653, 5.3.9] Federally Enforceable Through Title V Permit
14. Permittee shall keep records of the daily VOC and PM10 emissions and cumulative annual (calendar year) VOC emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
15. 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 type of cleaning activity for which each solvent is used. [District Rule 4653, 6.1.4] Federally Enforceable Through Title V Permit
16. Daily records shall be maintained and contain the following information: The name, type, quantity and VOC content of all adhesives, primers and solvents used or stored at the facility; the composite vapor pressure for all solvents to which a composite vapor pressure limit applies; and the combined total amount of VOC's emitted from the use of all VOC-containing material, in pounds. [District Rule 4653, 6.1.1] Federally Enforceable Through Title V Permit
17. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 1070, 2520, 9.4.2 and 4653, 6.1.3] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

ATTACHMENT C

Detailed Facility List

Detailed Facility Report
For Facility=1074 and excluding Deleted Permits
Sorted by Facility Name and Permit Number

PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
C-1074-11-3	40 HP	3020-01 B	1	117.00	117.00	A	WOODWORKING OPERATION WITH ONE (1) RADIAL ARM SAW, ONE (1) TABLE SAW, SERVED BY A 1,200 CFM LMC 160-IRI-A AND ONE (1) ROUTER SERVED BY A 6,000 CFM DUST TECHNOLOGY MODEL DT-150 DUST COLLECTOR
C-1074-12-3	15 hp	3020-01 A	1	87.00	87.00	A	ADHESIVE OPERATION WITH A 15 HP COMPRESSOR AND HIGH VOLUME LOW PRESSURE (HVLP) SPRAY EQUIPMENT

Number of Facilities Reported: 1

ATTACHMENT D

CURRENT DISTRICT RULE 4601 SIP
COMPARISON

Detailed Facility Report
For Facility=1074 and excluding Deleted Permits
Sorted by Facility Name and Permit Number

SANGER BOATS, INC. 3316 E ANNADALE AVE FRESNO, CA 93725	FAC # STATUS: TELEPHONE:	C 1074 A 2094852842	TYPE: TOXIC ID:	TitleV 40206	EXPIRE ON: AREA: INSP. DATE:	04/30/2010 9 / 08/11
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PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
C-1074-1-4	45.0 HP FIBERGLASS-RESIN AP	3020-01 B	1	117.00	117.00	A	POLYESTER RESIN AND FIBERGLASS APPLICATION OPERATION TO HULL MOLDS FOR THE MANUFACTURE OF BOATS CONSISTING OF HVLP, NON-ATOMIZING FLOW COATER APPLICATOR(S), FIVE 1.5 HP EXHAUST FANS, ONE 7.5 HP EXHAUST FAN AND TWO 15 HP COMPRESSORS
C-1074-2-3	2.0 HP SPRAY BOOTH #1	3020-01 A	1	87.00	87.00	A	POLYESTER GEL COAT APPLICATION OPERATION TO MOLDS CONSISTING OF HVLP AND AIR-ASSISTED AIRLESS SPRAY GUNS, A 14'W X 26'L X 9'H DEVILBISS SPRAY BOOTH (BOOTH #1), 14 (20" X 20") FILTERS, AND A 2 HP EXHAUST FAN
C-1074-3-3	2.0 HP SPRAY BOOTH #2	3020-01 A	1	87.00	87.00	A	POLYESTER RESIN AND FIBERGLASS APPLICATION OPERATION TO MOLDS CONSISTING OF HVLP, NON-ATOMIZING FLOW COATER APPLICATOR(S), A 12'W X 10'L X 8'H SPRAY BOOTH (BOOTH #2), 28 (20" X 20") FILTERS AND A 2 HP EXHAUST FAN
C-1074-4-3	2.0 HP SPRAY BOOTH #5	3020-01 A	1	87.00	87.00	A	POLYESTER GEL COAT APPLICATION OPERATION TO MOLDS CONSISTING OF HVLP AND AIR-ASSISTED AIRLESS SPRAY GUNS, A 13'W X 15'L X 10'H SPRAY KING 200 SPRAY/TOOLING BOOTH (BOOTH #5), 18 (20" X 20") FILTERS AND A 2 HP EXHAUST FAN
C-1074-5-1	2.0 HP PARTS GRINDING BOOTH #3	3020-01 A	1	87.00	87.00	A	WOOD AND FIBERGLASS TRIM GRINDING OPERATION CONSISTING OF A 12'W X 24'L X 9'H PARTS GRINDING BOOTH (BOOTH #3), 20 (20" X 20") FILTERS AND A 2 HP EXHAUST FAN
C-1074-6-1	2.0 HP GRINDING BOOTH #4	3020-01 A	1	87.00	87.00	A	WOOD AND FIBERGLASS TRIM GRINDING OPERATION CONSISTING OF A 14'W X 48'L X 10'H SPRAY KING 200 GRINDING BOOTH (BOOTH #4), 18 (20" X 20") FILTERS AND A 2 HP EXHAUST FAN
C-1074-7-3	2.0 HP SPRAY BOOTH #6	3020-01 A	1	87.00	87.00	A	POLYESTER GEL COAT APPLICATION OPERATION TO MOLDS AND PATTERNS CONSISTING OF HVLP AND AIR-ASSISTED AIRLESS SPRAY GUNS, A 14'W X 26'L X 9'H DEVILBISS SPRAY BOOTH (BOOTH #6), 12 (24" X 20") FILTERS AND A 2 HP EXHAUST FAN
C-1074-8-3	2.0 HP SPRAY BOOTH #7	3020-01 A	1	87.00	87.00	A	POLYESTER GEL COAT APPLICATION OPERATION TO MOLDS AND PATTERNS CONSISTING OF HVLP AND AIR-ASSISTED AIRLESS SPRAY GUNS, A 14'W X 26'L X 9'H DEVILBISS SPRAY BOOTH (BOOTH #7), 12 (24" X 20") FILTERS AND A 2 HP EXHAUST FAN
C-1074-9-3	2.0 HP SPRAY BOOTH #8	3020-01 A	1	87.00	87.00	A	POLYESTER RESIN APPLICATION OPERATION TO WOOD COMPONENTS CONSISTING OF A 14'W X 26'L X 9'H DEVILBISS SPRAY BOOTH (BOOTH #8), 14 (20" X 20") FILTERS AND A 2 HP EXHAUST FAN
C-1074-10-1	7 hp electric motors	3020-01 A	1	87.00	87.00	A	A METAL CUTTING OPERATION WITH A BRILLIANT, MODEL BDM51, CUTTING SAW SERVED BY AN AERCOLOGY/DONALDSON, MODEL DM-1500 BAGHOUSE

Stringency Comparison of District Rule 4601 Non-SIP Version (12/17/09) to Current SIP Version (10/31/01)

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
2.0 Applicability	This rule is applicable to any person who supplies, sells, offers for sale, applies, or solicits the application of any architectural coating, or who manufactures any architectural coating for use within the District.	This rule is applicable to any person who supplies, sells, offers for sale, applies, or solicits the application of any architectural coating, or who manufactures, blends or repackages any architectural coating for use within the District.	No change in the applicability, therefore, non-SIP version of rule is as stringent as SIP version.
4.0 Exemptions	<p>The provisions of this rule shall not apply to:</p> <p>4.1 Any architectural coating that is sold or manufactured for use outside of the District or for shipment to other manufacturers for reformulation or repackaging.</p> <p>4.2 Any architectural coating that is sold in a containers with a volume of one liter (1.057 quarts) or less.</p> <p>4.3 Any aerosol coating product.</p>	<p>4.1 The provisions of this rule shall not apply to:</p> <p>4.1.1 Any architectural coating that is supplied, sold, offered for sale, or manufactured for use outside of the District or for shipment to other manufacturers for reformulation or repackaging.</p> <p>4.1.2 Any aerosol coating product.</p> <p>4.2 With the exception of Section 6.2, the provisions of this rule shall not apply to any architectural coating that is sold in a container with a volume of one liter (1.057 quarts) or less.</p>	The only change is to require reporting requirements as discussed in Section 6.2 of the non-SIP approved version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.
5.0 Requirements	Note: Section 5.0 requirements refer to Table of Standards, Table of Standards 1, and Table of Standards 2. These tables are included as Attachment X.		
	<p>5.1 VOC Content Limits: Except as provided in Sections 5.2, 5.3, 5.8 and 8.0, no person shall;</p> <p>5.1.1 manufacture, blend, or repackage for sale within the District;</p> <p>5.1.2 supply, sell, or offer for sale within the district;</p> <p>5.1.3 solicit for application or apply within the District any architectural coating with a VOC content in excess of the corresponding limit specified in the Table of Standards, after the specified effective date in the Table of Standards.</p>	<p>5.1 VOC Content Limits: Except as provided in Sections 5.2 and 5.3, no person shall: manufacture, blend, or repackage for use within the District; or supply, sell, or offer for sale within the District; or solicit for application or apply within the District any architectural coating with a VOC content in excess of the corresponding limit specified in the Table of Standards 1 or the Table of Standards 2, after the specified effective date in the Table of Standards 1 or the Table of Standards 2. Limits are expressed as VOC Regulatory, thinned to the manufacturer's maximum thinning recommendation, excluding any colorant added to tint bases.</p>	Sections 5.8 and 8.0 of the SIP version are not included in the non-SIP version. As discussed in corresponding sections the non-SIP version is more stringent. The Table of Standards and Table of Standards 1 have the same VOC limits. Table of Standard 2 is more stringent as discussed below. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.
	<p>5.2 Most Restrictive VOC Limit: If anywhere on the container of any architectural coating, or any label or sticker affixed to the container, or in any sales, advertising, or technical literature supplied by a manufacturer or anyone acting on their behalf, 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 in the Table of Standards, then the most restrictive VOC content limit shall apply. This provision does not apply to the following coating categories:</p> <p>5.2.1 Lacquer coatings (including lacquer sanding sealers)</p> <p>5.2.2 Metallic pigmented coatings</p> <p>5.2.3 Shellacs</p> <p>5.2.4 Fire-retardant coatings</p> <p>5.2.5 Pretreatment wash primers</p> <p>5.2.6 Industrial maintenance coatings</p> <p>5.2.7 Low-solids coatings</p>	<p>5.2 Most Restrictive VOC Limit: If a coating meets the definition in Section 3.0 for one or more specialty coating categories listed in the Table of Standards 1 or the Table of Standards 2, then that coating is not required to meet the VOC limits for Flat, Nonflat, or Nonflat – High Gloss coatings, but is required to meet the VOC limit for the applicable specialty coating listed in the Table of Standards 1 or the Table of Standards 2.</p> <p>5.2.1 Effective until December 31, 2010, with the exception of the specialty coating categories specified in Section 5.2.3.1 through 5.2.3.15, if a coating is recommended for use in more than one of the specialty coating categories listed in the Table of Standards 1, the most restrictive (or lowest) VOC content limit shall apply.</p> <p>5.2.2 Effective on and after January 1, 2011, with the exception of the</p>	The VOC limit of the non-SIP version is at least as stringent as the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>5.2.8 Wood preservatives</p> <p>5.2.9 High temperature coatings</p> <p>5.2.10 Temperature-indicator safety coatings</p> <p>5.2.11 Antenna coatings</p> <p>5.2.12 Antifouling coatings</p> <p>5.2.13 Flow coatings</p> <p>5.2.14 Bituminous roof primers</p> <p>5.2.15 Specialty primers, sealers and undercoaters</p>	<p>specialty coating categories specified in Sections 5.2.3.2, 5.2.3.3, 5.2.3.5 through 5.2.3.9, and 5.2.3.14 through 5.2.3.18, if a coating is recommended for use in more than one of the specialty coating categories listed in the Table of Standards 2, the most restrictive (or lowest) VOC content limit shall apply.</p> <p>5.2.3 This requirement applies to: usage recommendations that appear anywhere on the coating container, anywhere on any label or sticker affixed to the container, or in any sales, advertising, or technical literature supplied by a manufacturer or anyone acting on their behalf.</p> <p>5.2.3.1 Lacquer coatings (including lacquer sanding sealers)</p> <p>5.2.3.2 Metallic pigmented coatings</p> <p>5.2.3.3 Shellacs</p> <p>5.2.3.4 Fire-retardant coatings</p> <p>5.2.3.5 Pretreatment wash primers</p> <p>5.2.3.6 Industrial maintenance coatings</p> <p>5.2.3.7 Low-solids coatings</p> <p>5.2.3.8 Wood preservatives</p> <p>5.2.3.9 High temperature coatings</p> <p>5.2.3.10 Temperature-indicator safety coatings</p> <p>5.2.3.11 Antenna coatings</p> <p>5.2.3.12 Antifouling coatings</p> <p>5.2.3.13 Flow coatings</p> <p>5.2.3.14 Bituminous roof primers</p> <p>5.2.3.15 Specialty primers, sealers and undercoaters</p> <p>5.2.3.16 Aluminum roof coatings</p> <p>5.2.3.17 Zinc-rich primers</p> <p>5.2.3.18 Wood Coatings</p>	
	<p>5.3 Sell-Through of Coatings:</p> <p>5.3.1 A coating manufactured prior to the January 1, 2003 or January 1, 2004 effective date specified for that coating in the Table of Standards may be sold, supplied, or offered for sale for up to three years after the specified effective date. In addition, a coating manufactured before the effective date specified for that coating in the Table of Standards may be applied at any time, both before and after the specified effective date, so long as the coating complied with the standards in effect at the time the coating was manufactured. This Section 5.3 does not apply to any coating that does not display the date or date-code required by Section 6.1.1.</p> <p>5.3.2 A coating included in an approved Averaging Program that does not comply with the specified limit in the</p>	<p>5.3 Sell-Through of Coatings:</p> <p>A coating manufactured prior to the effective date specified for that coating in the Table of Standards 1 or the Table of Standards 2, and that complied with the standards in effect at the time the coating was manufactured, may be sold, supplied, or offered for sale for up to three years after the specified effective date. In addition, a coating manufactured before the effective date specified for that coating in the Table of Standards 1 or the Table of Standards 2 may be applied at any time, both before and after the specified effective date, so long as the coating complied with the standards in effect at the time the coating was manufactured. This Section 5.3 does not apply to any coating that does not display the date or date-code required by Section 6.1.1.</p>	<p>The VOC limit of the non-SIP version is at least as stringent as the SIP version. Section 5.3.2 was removed it is no longer applicable in the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</p>

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>Table of Standards may be sold, supplied, or offered for sale for up to three years after the end of the compliance period specified in the approved Averaging Program. In addition, such a coating may be applied at any time, both during and after the compliance period. This Section 5.3.2 does not apply to any coating that does not display on the container either the statement: "This product is subject to architectural coatings averaging provisions in California" or a substitute symbol specified by the Executive Officer of the California Air Resources Board (ARB). This Section 5.3.2 shall remain in effect until January 1, 2008.</p>		
	<p>5.4 Painting Practices: All architectural coating containers used to apply the contents therein to a surface directly from the container by pouring, siphoning, brushing, rolling, padding, ragging or other means, shall be closed when not in use. These architectural coating containers include, but are not limited to, drums, buckets, cans, pails, trays or other application containers. Containers of any VOC containing materials used for thinning and cleanup shall also be closed when not in use.</p>	<p>5.4 Painting Practices: All architectural coating containers used to apply the contents therein to a surface directly from the container by pouring, siphoning, brushing, rolling, padding, ragging or other means, shall be closed when not in use. These architectural coating containers include, but are not limited to, drums, buckets, cans, pails, trays or other application containers. Containers of any VOC-containing materials used for thinning and cleanup shall also be closed when not in use.</p>	<p>No change in the requirements, therefore, non-SIP version of rule is as stringent as SIP version.</p>
	<p>5.5 Thinning: No person who applies or solicits the application of any architectural coating shall apply a coating that is thinned to exceed the applicable VOC limit specified in the Table of Standards.</p>	<p>5.5 Thinning: No person who applies or solicits the application of any architectural coating shall apply a coating that is thinned to exceed the applicable VOC limit specified in the Table of Standards 1 or the Table of Standards 2.</p>	<p>The VOC limit of the non-SIP version is at least as stringent as the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</p>
	<p>5.6 Rust Preventative Coatings: Effective January 1, 2004, no person shall apply or solicit the application of any rust preventative coating for industrial use, unless such a rust preventative coating complies with the industrial maintenance coating VOC limit specified in the Table of Standards.</p>	<p>5.6 Rust Preventative Coatings: Effective through December 31, 2010, no person shall apply or solicit the application of any rust preventative coating for industrial use, unless such a rust preventative coating complies with the industrial maintenance coating VOC limit specified in the Table of Standards 1.</p>	<p>The VOC limit of the non-SIP version is at least as stringent as the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</p>
	<p>5.7 Coatings Not Listed in the Table of Standards: For any coating that does not meet any of the definitions for the specialty coatings categories listed in the Table of Standards, the VOC content limit shall be determined by classifying the coating as a flat coating or a nonflat coating, based on its gloss, as defined in Sections 3.21, 3.36 and 3.37 and the corresponding flat or nonflat VOC limit shall apply.</p>	<p>5.7 Coatings Not Listed in the Table of Standards 1 or the Table of Standards 2: For any coating that does not meet any of the definitions for the specialty coatings categories listed in the Table of Standards 1 or the Table of Standards 2, the VOC content limit shall be determined by classifying the coating as a Flat, Nonflat, or Nonflat – High Gloss coating, based on its gloss, and the corresponding Flat, Nonflat, or Nonflat – High Gloss VOC limit in the Table of Standards 1 or the Table of Standards 2 shall apply.</p>	<p>The VOC limit of the non-SIP version is at least as stringent as the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</p>
	<p>5.8 Lacquers: Notwithstanding the provisions of Section 3.1, a person or facility may add up to 10 percent by volume of VOC to a lacquer to avoid blushing of the finish during days with relative humidity greater</p>	<p>---</p>	<p>This section has been removed. The operation is required to meet the lacquer VOC limit regardless of</p>

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	than 70 percent and temperature below 65°F, at the time of application, provided that the coating contains acetone and no more than 550 grams of VOC per liter of coating, less water and exempt compounds, prior to the addition of VOC.		temperature and humidity. Therefore, non-SIP version of rule is as stringent as SIP version
	5.9 Averaging Compliance Option: On or after January 1, 2003, in lieu of compliance with the specified limits in The Table of Standards for floor coatings; industrial maintenance coatings; primers, sealers, and undercoaters; quick-dry primers, sealers, and undercoaters; quick-dry enamels; roof coatings; bituminous roof coatings; rust preventative coatings; stains; waterproofing sealers, as well as flats and non-flats (excluding recycled coatings), manufacturers may average designated coatings such that their actual cumulative emissions from the averaged coatings are less than or equal to the cumulative emissions that would have been allowed under those limits over a compliance period not to exceed one year. Such manufacturers must also comply with the averaging provisions contained in Section 8.0, as well as maintain and make available for inspection records for at least three years after the end of the compliance period. This Section 5.9 and Section 8.0 shall cease to be effective on January 1, 2005, after which averaging will no longer be allowed.	---	This section is removed from the non-SIP version, it is no longer applicable. Therefore, non-SIP version of rule is as stringent as SIP version.
	---	5.8 Prior to January 1, 2011, any coating that meets a definition in Section 3.0 for a coating category listed in the Table of Standards 2 and complies with the applicable VOC limit in the Table of Standards 2 and with Sections 5.2 and 6.1 (including those provision of Section 6.1 otherwise effective on January 1, 2011) shall be considered in compliance with this rule.	Table of Standards 2 is more stringent than the VOC limits of Table of Standards in the SIP-Approved version. Therefore, non-SIP version of rule is as stringent as SIP version.
6.0 Administrative Requirements	Table of Standards (See Attachment X for Table)	Table of Standards 1 (Effective through 12/31/10) (See Attachment X for Table)	The non-SIP rule requirements are the same as the Table of Standards in the SIP approved rule, except Table of Standards 1 expires at which time Table of Standards 2 is in effect. As discussed below these standards are more stringent. Therefore, non-SIP version of rule is as stringent as SIP version.
6.0 Administrative Requirements		Table of Standards 2 (Effective on and after 1/1/11) (See Attachment X for Table)	The requirements of Table of Standards 2 are more stringent than the Table of Standards in the SIP rule. Therefore, non-SIP version of rule is as stringent as SIP version.
6.0 Administrative Requirements	6.1 Labeling Requirements: Each manufacturer of any architectural coating subject to this rule shall display the information listed in Sections	6.1 Labeling Requirements: Each manufacturer of any architectural coating subject to this rule shall display the	The non-SIP approved rule contain sections listed in the SIP rule plus

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>6.1.1 through 6.1.9 on the coating container (or label) in which the coating is sold or distributed.</p> <p>6.1.1 Date Code: The date the coating was manufactured, or a date code representing the date, shall be indicated on the label, lid or bottom of the container. If the manufacturer uses a date code for any coating, the manufacturer shall file an explanation of each code with the Executive Officer of the ARB.</p> <p>6.1.2 Thinning Recommendations: A statement of the manufacturer's recommendation regarding thinning of the coating shall be indicated on the label or lid of the container. This requirement does not apply to the thinning of architectural coatings with water. If thinning of the coating prior to use is not necessary, the recommendation must specify that the coating is to be applied without thinning.</p> <p>6.1.3 VOC Content: Each container of any coating subject to this rule shall display either the maximum or actual VOC content of the coating, as supplied, including the maximum thinning as recommended by the manufacturer. VOC content shall be displayed in grams of VOC per liter of coating. VOC content displayed shall be calculated using product formulation data, or shall be determined using the test methods in Section</p> <p>6.3.1. The equations in Sections 3.25 or 3.26, as appropriate, shall be used to calculate VOC content.</p> <p>6.1.4 Industrial Maintenance Coatings: In addition to the information specified in Sections 6.1.1, 6.1.2 and 6.1.3, each manufacturer of any industrial maintenance coating subject to this rule shall display on the label or lid of the container in which the coating is sold or distributed one or more of the following descriptions listed in Section 6.1.4.1 through 6.1.4.3.</p> <p>6.1.4.1 "For industrial use only"</p> <p>6.1.4.2 "For professional use only"</p> <p>6.1.4.3 "Not for residential use" or "Not intended for residential use"</p> <p>6.1.5 Clear Brushing Lacquers: Effective January 1, 2003, the labels of all clear brushing lacquers shall prominently display the statements "For brush application only," and "This product must not be thinned or sprayed."</p> <p>6.1.6 Rust Preventative Coatings: Effective January 1, 2003, the labels of all rust preventative coatings shall prominently display the statement "For Metal Substrates Only"</p> <p>6.1.7 Specialty Primers, Sealers and Undercoaters: Effective January 1, 2003, the labels of all specialty primers, sealers and undercoaters shall prominently</p>	<p>information listed in Sections 6.1.1 through 6.1.14 on the coating container (or label) in which the coating is sold or distributed.</p> <p>6.1.1 Date Code: The date the coating was manufactured, or a date code representing the date, shall be indicated on the label, lid or bottom of the container. If the manufacturer uses a date code for any coating, the manufacturer shall file an explanation of each code with the Executive Officer of the ARB.</p> <p>6.1.2 Thinning Recommendations: A statement of the manufacturer's recommendation regarding thinning of the coating shall be indicated on the label or lid of the container. This requirement does not apply to the thinning of architectural coatings with water. If thinning of the coating prior to use is not necessary, the recommendation must specify that the coating is to be applied without thinning.</p> <p>6.1.3 VOC Content: Each container of any coating subject to this rule shall display one of the following values, in grams of VOC per liter of coating:</p> <p>6.1.3.1 Maximum VOC Content, as determined from all potential product formulations; or</p> <p>6.1.3.2 VOC Content, as determined from actual formulation data; or</p> <p>6.1.3.3 VOC Content, as determined using the test methods in Section 6.3.2.</p> <p>If the manufacturer does not recommend thinning, the container must display the VOC Content, as supplied. If the manufacturer recommends thinning, the container must display the VOC Content, including the maximum amount of thinning solvent recommended by the manufacturer. If the coating is a multicomponent product, the container must display the VOC content as mixed or catalyzed. If the coating contains silanes, siloxanes, or other ingredients that generate ethanol or other VOCs during the curing process, the VOC content must include the VOCs emitted during curing.</p> <p>6.1.4 Faux Finishing Coatings: Effective January 1, 2011, the labels of all clear topcoat Faux Finishing coatings shall prominently display the statement "This product can only be sold or used as part of a Faux Finishing coating system".</p> <p>6.1.5 Industrial Maintenance Coatings: Each manufacturer of any industrial maintenance coating subject to this rule shall display on the label or lid of</p>	<p>additional requirements not found in the SIP version. Therefore, non-SIP version of rule is as stringent as SIP version.</p>

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>display one or more of the descriptions listed in Section</p> <p>6.1.7.1 through 6.1.7.5.</p> <p>6.1.7.1 For blocking stains.</p> <p>6.1.7.2 For fire-damaged substrates.</p> <p>6.1.7.3 For smoke-damaged substrates.</p> <p>6.1.7.4 For water-damaged substrates.</p> <p>6.1.7.5 For excessively chalky substrates.</p> <p>6.1.8 Quick Dry Enamels: Effective January 1, 2003, the labels of all quick dry enamels shall prominently display the words "Quick Dry" and the dry hard time.</p> <p>6.1.9 Non-flat – High Gloss Coatings: Effective January 1, 2003, the labels of all non-flat – high gloss coatings shall prominently display the words "High Gloss".</p>	<p>the container in which the coating is sold or distributed one or more of the following descriptions listed in Section 6.1.5.1 through 6.1.5.3.</p> <p>6.1.5.1 "For industrial use only"</p> <p>6.1.5.2 "For professional use only"</p> <p>6.1.5.3 "Not for residential use" or "Not intended for residential use"</p> <p>6.1.6 Clear Brushing Lacquers: The labels of all clear brushing lacquers shall prominently display the statements "For brush application only," and "This product must not be thinned or sprayed." (Category deleted effective January 1, 2011.)</p> <p>6.1.7 Rust Preventative Coatings: The labels of all rust preventative coatings shall prominently display the statement "For Metal Substrates Only".</p> <p>6.1.8 Specialty Primers, Sealers and Undercoaters: Effective until December 31, 2010, the labels of all specialty primers, sealers and undercoaters shall prominently display one or more of the descriptions listed in Section 6.1.8.1 through 6.1.8.5. Effective on and after January 1, 2011, the labels of all specialty primers, sealers, and undercoaters shall prominently display one or more of the descriptions listed in Sections 6.1.8.1 through 6.1.8.3. On and after January 1, 2011, Sections 6.1.8.4 and 6.1.8.5 will be no longer effective.</p> <p>6.1.8.1 For fire-damaged substrates.</p> <p>6.1.8.2 For smoke-damaged substrates.</p> <p>6.1.8.3 For water-damaged substrates.</p> <p>6.1.8.4 For excessively chalky substrates.</p> <p>6.1.8.5 For blocking stains.</p> <p>6.1.9 Quick Dry Enamels: The labels of all quick dry enamels shall prominently display the words "Quick Dry" and the dry hard time. (Category deleted effective January 1, 2011.)</p> <p>6.1.10 Reactive Penetrating Sealers: Effective January 1, 2011, the labels of all Reactive Penetrating Sealers shall prominently display the statement "Reactive Penetrating Sealer."</p> <p>6.1.11 Stone Consolidants: Effective January 1, 2011, the labels of all Stone Consolidants shall prominently display the statement "Stone Consolidant - For Professional Use Only."</p> <p>6.1.12 Nonflat– High Gloss Coatings: The labels of all Nonflat – high gloss coatings shall prominently display the words "High Gloss."</p>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
		<p>6.1.13 Wood Coatings: Effective January 1, 2011, the labels of all Wood Coatings shall prominently display the statement "For Wood Substrates Only."</p> <p>6.1.14 Zinc Rich Primers: Effective January 1, 2011, the labels of all Zinc Rich Primers shall prominently display one or more of the following descriptions listed in Section 6.1.14.1 through 6.1.14.3.</p> <p>6.1.14.1 "For industrial use only"</p> <p>6.1.14.2 "For professional use only"</p> <p>6.1.14.3 "Not for residential use" or "Not intended for residential use"</p>	
	<p>6.2 Reporting Requirements</p> <p>6.2.1 Clear Brushing Lacquers: Each manufacturer of clear brushing lacquers shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of clear brushing lacquers sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.2 Rust Preventative Coatings: Each manufacturer of rust preventative coatings shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of rust preventative coatings sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.3 Specialty Primers, Sealers and Undercoaters: Each manufacturer of specialty primers, sealers and undercoaters shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of specialty primers, sealers and undercoaters sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.4 Toxic Exempt Compounds: For each architectural coating that contains perchloroethylene or methylene chloride, the manufacturer shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB the following information for products sold in the State during the preceding year:</p> <p>6.2.4.1 the product brand name and a copy of the product label with legible usage instructions;</p>	<p>6.2 Reporting Requirements</p> <p>The reporting requirements specified in Sections 6.2.1 through 6.2.6 shall apply until December 31, 2010.</p> <p>6.2.1 Clear Brushing Lacquers: Each manufacturer of clear brushing lacquers shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of clear brushing lacquers sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.2 Rust Preventative Coatings: Each manufacturer of rust preventative coatings shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of rust preventative coatings sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.3 Specialty Primers, Sealers and Undercoaters: Each manufacturer of specialty primers, sealers and undercoaters shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of specialty primers, sealers and undercoaters sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.4 Toxic Exempt Compounds: For each architectural coating that contains perchloroethylene or methylene chloride, the manufacturer shall, on or before April 1 of each calendar year beginning in the year 2004, submit an</p>	<p>Until December 31, 2010 both versions of the rule have the same reporting requirements. After that date the non-SIP approved rule includes very specific information to be kept and is required for all architectural coatings. Therefore, non-SIP version of rule is as stringent as SIP version.</p>

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>6.2.4.2 the product category listed in the Table of Standards to which the coating belongs;</p> <p>6.2.4.3 the total sales in California during the calendar year to the nearest gallon;</p> <p>6.2.4.4 the volume percent, to the nearest 0.10 percent, of perchloroethylene and methylene chloride in the coating.</p> <p>6.2.5 Recycled Coatings: Manufacturers of recycled coatings must submit a letter to the Executive Officer of the ARB certifying their status as a Recycled Paint Manufacturer. The manufacturer shall, on or before April 1 of each calendar year beginning with the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall include, for all recycled coatings, the total number of gallons distributed in the State during the preceding year, and shall describe the method used by the manufacturer to calculate State distribution.</p> <p>6.2.6 Bituminous Coatings: Each manufacturer of bituminous roof coatings or bituminous roof primers shall, on or before April 1 of each calendar year beginning with the year 2004, submit an annual report to the Executive Officer of ARB. The report shall specify the number of gallons of bituminous roof coatings or bituminous roof primers sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p>	<p>annual report to the Executive Officer of the ARB the following information for products sold in the State during the preceding year:</p> <p>6.2.4.1 the product brand name and a copy of the product label with legible usage instructions;</p> <p>6.2.4.2 the product category listed in the Table of Standards 1 or the Table of Standards 2 to which the coating belongs;</p> <p>6.2.4.3 the total sales in California during the calendar year to the nearest gallon;</p> <p>6.2.4.4 the volume percent, to the nearest 0.10 percent, of perchloroethylene and methylene chloride in the coating.</p> <p>6.2.5 Recycled Coatings: Manufacturers of recycled coatings must submit a letter to the Executive Officer of the ARB certifying their status as a Recycled Paint Manufacturer. The manufacturer shall, on or before April 1 of each calendar year beginning with the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall include, for all recycled coatings, the total number of gallons distributed in the State during the preceding year, and shall describe the method used by the manufacturer to calculate State distribution.</p> <p>6.2.6 Bituminous Coatings: Each manufacturer of bituminous roof coatings or bituminous roof primers shall, on or before April 1 of each calendar year beginning with the year 2004, submit an annual report to the Executive Officer of ARB. The report shall specify the number of gallons of bituminous roof coatings or bituminous roof primers sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate state sales.</p> <p>6.2.7 Effective on and after January 1, 2011, Sales Data: All sales data listed in Sections 6.2.7.1 to 6.2.7.14 shall be maintained on-site by the responsible official for a minimum of three years. A responsible official from each manufacturer shall upon request of the Executive Officer of the ARB, or his or her delegate, provide data concerning the distribution and sales of architectural coatings. Sales data submitted by the responsible official to the Executive Officer of the ARB may be claimed as confidential, and such information shall be handled in accordance with the procedures specified in Title 17,</p>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
		<p>California Code of Regulations Sections 91000-91022. The responsible official shall within 180 days provide information, including, but not limited to the data listed in Sections 6.2.7.1 through 6.2.7.14:</p> <p>6.2.7.1 the name and mailing address of the manufacturer;</p> <p>6.2.7.2 the name, address and telephone number of a contact person;</p> <p>6.2.7.3 the name of the coating product as it appears on the label and the applicable coating category;</p> <p>6.2.7.4 whether the product is marketed for interior or exterior use or both;</p> <p>6.2.7.5 the number of gallons sold in California in containers greater than one liter (1.057 quart) and equal to or less than one liter (1.057 quart);</p> <p>6.2.7.6 the VOC Actual content and VOC Regulatory content in grams per liter. If thinning is recommended, list the VOC Actual content and VOC Regulatory content after maximum recommended thinning. If containers less than one liter have a different VOC content than containers greater than one liter, list separately. If the coating is a multi-component product, provide the VOC content as mixed or catalyzed;</p> <p>6.2.7.7 the names and CAS numbers of the VOC constituents in the product;</p> <p>6.2.7.8 the names and CAS numbers of any compounds in the product specifically exempted from the VOC definition;</p> <p>6.2.7.9 whether the product is marketed as solvent-borne, waterborne, or 100% solids;</p> <p>6.2.7.10 description of resin or binder in the product;</p> <p>6.2.7.11 whether the coating is a single-component or multi-component product;</p> <p>6.2.7.12 the density of the product in pounds per gallon;</p> <p>6.2.7.13 the percent by weight of: solids, all volatile materials, water, and any compounds in the product specifically exempted from the VOC definition; and</p> <p>6.2.7.14 the percent by volume of: solids, water, and any compounds in the product specifically exempted from the VOC definition.</p>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>6.3 Test Methods</p> <p>6.3.1 VOC Content of Coatings: To determine the physical properties of a coating in order to perform the calculations in Section 3.26 and 3.27, the reference method for VOC content is U.S. EPA Method 24, except as provided in Sections 6.3.2 and 6.3.15. An alternative method to determine the VOC content of coatings is SCAQMD Method 304-91 (Revised February 1996), incorporated by reference in Section 6.3.14. The exempt compounds content shall be determined by SCAQMD Method 303-91 (Revised August 1996), incorporated by reference in Section 6.3.12. To determine the VOC content of a coating, the manufacturer may use U.S. EPA Method 24, or an alternative method as provided in Section 6.3.2, formulation data, or any other reasonable means for predicting that the coating has been formulated as intended (e.g., quality assurance checks, recordkeeping). However, if there are any inconsistencies between the results of a Method 24 test and any other means for determining VOC content, the Method 24 test results will govern, except when an alternative method is approved as specified in Section 6.3.2. The District Air Pollution Control Officer (APCO) may require the manufacturer to conduct a Method 24 analysis.</p> <p>6.3.2 Alternative Test Methods: Other test methods demonstrated to provide results that are acceptable for purposes of determining compliance with Section 6.3.1, after review and approved in writing by the staffs of the District, the ARB and the U.S. EPA, may also be used. 6.3.3 Methacrylate Traffic Marking Coatings: Analysis of methacrylate multicomponent coatings used as traffic marking coatings shall be conducted according to a modification of U.S. EPA Method 24 (40 CFR 59, subpart D, Appendix A), incorporated by reference in Section 6.3.15. This method has not been approved for methacrylate multicomponent coatings used for other purposes than as traffic marking coatings or for other classes of multicomponent coatings.</p> <p>6.3.4 Flame Spread Index: The flame spread index of a fire-retardant coating shall be determined by ASTM Designation E 84-99, "Standard Test Method for Surface Burning Characteristics of Building Materials"(see Section 3, Fire-Retardant Coating).</p> <p>6.3.5 Fire Resistance Rating: The fire</p>	<p>6.3 Test Methods</p> <p>The test methods listed below shall be used to demonstrate compliance with this rule. Alternate equivalent test methods may be used provided the test methods have been approved by the APCO and EPA.</p> <p>6.3.1 Calculation of VOC Content: For the purpose of determining compliance with the VOC content limits in the Table of Standards 1 or the Table of Standards 2, the VOC content of a coating shall be determined as defined in Section 3.77, 3.78, or 3.79 as appropriate. The VOC content of a tint base shall be determined without colorant that is added after the tint base is manufactured. If the manufacturer does not recommend thinning, the VOC Content must be calculated for the product as supplied. If the manufacturer recommends thinning, the VOC Content must be calculated including the maximum amount of thinning solvent recommended by the manufacturer. If the coating is a multi-component product, the VOC content must be calculated as mixed or catalyzed. If the coating contains silanes, siloxanes, or other ingredients that generate ethanol or other VOC during the curing process, the VOC content must include the VOCs emitted during curing.</p> <p>6.3.2 VOC Content of Coatings: To determine the physical properties of a coating in order to perform the calculations in Section 3.77 and 3.79, the reference method for VOC content is EPA Method 24, except as provided in Sections 6.3.3 and 6.3.16. An alternative method to determine the VOC content of coatings is SCAQMD Method 304-91 (Revised February 1996). The exempt compounds content shall be determined by SCAQMD Method 303-91 (Revised 1993), BAAQMD Method 43 (Revised 1996), or BAAQMD Method 41 (Revised 1995), as applicable. To determine the VOC content of a coating, the manufacturer may use EPA Method 24, or an alternative method as provided in Section 6.3.3, formulation data, or any other reasonable means for predicting that the coating has been formulated as intended (e.g., quality assurance checks, recordkeeping). However, if there are any inconsistencies between the results of EPA Method 24 test and any other means for determining VOC content, the EPA Method 24</p>	<p>The non-SIP version includes all the requirements of the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</p>

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>resistance rating of a fire-resistive coating shall be determined by ASTM Designation E 119-98, "Standard Test Methods for Fire Tests of Building Construction Materials"(see Section 3, Fire-Resistive Coating).</p> <p>6.3.6 Gloss Determination: The gloss of a coating shall be determined by ASTM Designation D 523-89 (1999), "Standard Test Method for Specular Gloss"(see Section 3, Flat Coating, Nonflat Coating, Nonflat-High Gloss Coating and Quick-Dry Enamel).</p> <p>6.3.7 Metal Content of Coatings: The metallic content of a coating shall be determined by SCAQMD Method 318-95, Determination of Weight Percent Elemental Metal in Coatings by X-Ray Diffraction, <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i> (see Section 3, Metallic Pigmented Coating).</p> <p>6.3.8 Acid Content of Coatings: The acid content of a coating shall be determined by ASTM Designation D 1613-96, "Standard Test Method for Acidity in Volatile Solvents and Chemical Intermediates Used in Paint, Varnish, Lacquer and related products"(see Section 3, Pre-Treatment Wash Primer).</p> <p>6.3.9 Drying Times: The set-to-touch, dry-hard, dry-to-touch and dry-to-recoat times of a coating shall be determined by ASTM Designation D 1640-95, "Standard Test Methods for Drying, Curing, or Film Formation of Organic Coatings at Room Temperature" (see Section 3, Quick-Dry Enamel and Quick-Dry Primer, Sealer and Undercoater) The tack-free time of a quickdry enamel coating shall be determined by the Mechanical Test Method of ASTM Designation D 1640-95.</p> <p>6.3.10 Surface Chalkiness: The chalkiness of a surface shall be determined using ASTM Designation D4214-98, "Standard Test Methods for Evaluating the Degree of Chalking of Exterior Paint Films"(see Section 3, Specialty Primer, Sealer and Undercoater).</p> <p>6.3.11 Exempt Compounds—Siloxanes: Exempt compounds that are cyclic, branched, or linear completely methylated siloxanes, shall be analyzed as exempt compounds for compliance with Section 6 by BAAQMD Method 43, "Determination of Volatile Methylsiloxanes in Solvent-Based Coatings, Inks, and Related Materials," <i>BAAQMD Manual of Procedures</i>, Volume III, adopted 11/6/96 (see Section 3, Volatile Organic Compound, and Section 6.3.1).</p> <p>6.3.12 Exempt Compounds—</p>	<p>test results will govern, except when an alternative method is approved as specified in Section 6.3.3. The District Air Pollution Control Officer (APCO) may require the manufacturer to conduct an EPA Method 24 analysis.</p> <p>6.3.3 Alternative Test Methods: Other test methods demonstrated to provide results that are acceptable for purposes of determining compliance with Section 6.3.2 4, after review and approved in writing by the staffs of the District, ARB and EPA, may also be used.</p> <p>6.3.4 Methacrylate Traffic Marking Coatings: Analysis of methacrylate multicomponent coatings used as traffic marking coatings shall be conducted according to a modification of EPA Method 24 (40 CFR 59, subpart D, Appendix A). This method has not been approved for methacrylate multicomponent coatings used for other purposes than as traffic marking coatings or for other classes of multicomponent coatings.</p> <p>6.3.5 Flame Spread Index: The flame spread index of a fire-retardant coating shall be determined by ASTM E84-07, "Standard Test Method for Surface Burning Characteristics of Building Materials" (see Section 3.0, Fire-Retardant Coating).</p> <p>6.3.6 Fire Resistance Rating: The fire resistance rating of a fire-resistive coating shall be determined by ASTM E119-07, "Standard Test Methods for Fire Tests of Building Construction Materials" (see Section 3.0, Fire-Resistive Coating).</p> <p>6.3.7 Gloss Determination: The gloss of a coating shall be determined by ASTM D523-89 (1999), "Standard Test Method for Specular Gloss" (see Section 3.0, Flat Coating, Nonflat Coating, Nonflat-High Gloss Coating and Quick-Dry Enamel).</p> <p>6.3.8 Metal Content of Coatings: The metallic content of a coating shall be determined by SCAQMD Method 318-95, Determination of Weight Percent Elemental Metal in Coatings by X-Ray Diffraction, <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i> (see Section 3.0, Metallic Pigmented Coating, Aluminum Roof Coating and Faux Finish).</p> <p>6.3.9 Acid Content of Coatings: The acid content of a coating shall be determined by ASTM D1613-06, "Standard Test Method for Acidity in Volatile Solvents and Chemical Intermediates Used in Paint, Varnish, Lacquer and related products" (see Section 3.0, Pre-Treatment Wash Primer).</p>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>Parachlorobenzotrifluoride (PCBTF): The exempt compound parachlorobenzotrifluoride, shall be analyzed as an exempt compound for compliance with Section 6 by BAAQMD Method 41, "Determination of Volatile Organic Compounds in Solvent Based Coatings and Related Materials Containing Parachlorobenzotrifluoride," <i>BAAQMD Manual of Procedures</i>, Volume III, adopted 12/20/95 (see Section 3, Volatile Organic Compound, and Section 6.3.1).</p> <p>6.3.13 Exempt Compounds: The content of compounds under U.S. EPA Method 24 shall be analyzed by SCAQMD Method 303-91 (Revised 1996), "Determination of Exempt Compounds," <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i> (see Section 3, Volatile Organic Compound, and Section 6.3.1).</p> <p>6.3.14 VOC Content of Coatings: The VOC content of a coating shall be determined by U.S. EPA Method 24 as it exists in appendix A of 40 <i>Code of Federal Regulations</i> (CFR) part 60, "Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings"(see Section 6.3.1).</p> <p>6.3.15 Alternative VOC Content of Coatings: The VOC content of coatings may be analyzed either by U.S. EPA Method 24 or SCAQMD Method 304-91 (Revised 1996), "Determination of Volatile Organic Compounds (VOC) in Various Materials," <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i> (see Section 6.3.1).</p> <p>6.3.16 Methacrylate Traffic Marking Coatings: The VOC content of methacrylate multicomponent coatings used as traffic marking coatings shall be analyzed by the procedures in 40 CFR part 59, subpart D, appendix A, "Determination of Volatile Matter Content of Methacrylate Multicomponent Coatings Used as Traffic Marking Coatings" (September 11, 1998) (see Section 6.3.3).</p>	<p>6.3.10 Drying Times: The set-to-touch, dry-hard, dry-to-touch and dry-to-recoat times of a coating shall be determined by ASTM D1640-95, "Standard Test Methods for Drying, Curing, or Film Formation of Organic Coatings at Room Temperature" (see Section 3.0, Quick-Dry Enamel and Quick-Dry Primer, Sealer and Undercoater) The tack-free time of a quick-dry enamel coating shall be determined by the Mechanical Test Method of ASTM D1640-95. (Category deleted effective January 1, 2011.)</p> <p>6.3.11 Surface Chalkiness: The chalkiness of a surface shall be determined using ASTM D4214-98, "Standard Test Methods for Evaluating the Degree of Chalking of Exterior Paint Films"(see Section 3, Specialty Primer, Sealer and Undercoater). (Category deleted effective January 1, 2011.)</p> <p>6.3.12 Exempt Compounds—Siloxanes: Exempt compounds that are cyclic, branched, or linear completely methylated siloxanes, shall be analyzed as exempt compounds for compliance with Section 6 by BAAQMD Method 43, "Determination of Volatile Methylsiloxanes in Solvent-Based Coatings, Inks, and Related Materials," <i>BAAQMD Manual of Procedures</i>, Volume III, adopted 11/6/96 (see Section 3.0, Volatile Organic Compound, and Section 6.3.2).</p> <p>6.3.13 Exempt Compounds—Parachlorobenzotrifluoride (PCBTF): The exempt compound parachlorobenzotrifluoride, shall be analyzed as an exempt compound for compliance with Section 6 by BAAQMD Method 41, "Determination of Volatile Organic Compounds in Solvent Based Coatings and Related Materials Containing Parachlorobenzotrifluoride," <i>BAAQMD Manual of Procedures</i>, Volume III, adopted 12/20/95 (see Section 3.0, Volatile Organic Compound, and Section 6.3.2).</p> <p>6.3.14 Exempt Compounds: The content of compounds under U.S. EPA Method 24 shall be analyzed by SCAQMD Method 303-91 (Revised 1993), "Determination of Exempt Compounds," <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i> (see Section 3.0, Volatile Organic Compound, and Section 6.3.2).</p> <p>6.3.15 VOC Content of Coatings: The VOC content of a coating shall be determined by EPA Method 24 as it exists in appendix A of 40 <i>Code of</i></p>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
		<p><i>Federal Regulations (CFR) part 60, "Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings" (see Section 6.3.2).</i></p> <p>6.3.16 Alternative VOC Content of Coatings: The VOC content of coatings may be analyzed either by U.S. EPA Method 24 or SCAQMD Method 304-91 (Revised 1996), "Determination of Volatile Organic Compounds (VOC) in Various Materials," <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples.</i></p> <p>6.3.17 Methacrylate Traffic Marking Coatings: The VOC content of methacrylate multicomponent coatings used as traffic marking coatings shall be analyzed by the procedures in 40 CFR part 59, subpart D, appendix A, "Determination of Volatile Matter Content of Methacrylate Multicomponent Coatings Used as Traffic Marking Coatings" (September 11, 1998).</p> <p>6.3.18 Hydrostatic Pressure for Basement Specialty Coatings: The hydrostatic pressure resistance for basement specialty coatings shall be analyzed using ASTM D7088-04, "Standard Practice for Resistance to Hydrostatic Pressure for Coatings Used in Below Grade Applications Applied to Masonry".</p> <p>6.3.19 Tub and Tile Refinish Coating Adhesion: The adhesion of tub and tile coating shall be determined by ASTM D4585-99, "Standard Practice for Testing Water Resistance of Coatings Using Controlled Condensation" and ASTM D3359-02, "Standard Test Methods for Measuring Adhesion by Tape Test".</p> <p>6.3.20 Tub and Tile Refinish Coating Hardness: The hardness of tub and tile refinish coating shall be determined by ASTM D3363-05, "Standard Test Method for Film Hardness by Pencil Test".</p> <p>6.3.21 Tub and Tile Refinish Coating Abrasion Resistance: Abrasion resistance of tub and tile refinish coating shall be analyzed by ASTM D4060-07, "Standard Test Methods for Abrasion Resistance of Organic Coatings by the Taber Abraser".</p> <p>6.3.22 Tub and Tile Refinish Coating Water Resistance: Water resistance of tub and tile refinish coatings shall be determined by ASTM D4585-99, "Standard Practice for Testing Water Resistance of Coatings Using Controlled Condensation" and ASTM D714-02e1, "Standard Test Method</p>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
		<p>for Evaluating Degree of Blistering of Paints".</p> <p>6.3.23 Waterproofing Membrane: Waterproofing membrane shall be tested by ASTM C836-06, "Standard Specification for High Solids Content, Cold Liquid-Applied Elastomeric Waterproofing Membrane for Use with Separate Wearing Course".</p> <p>6.3.24 Mold and Mildew Growth for Basement Specialty Coatings: Mold and mildew growth resistance for basement specialty coatings shall be determined by ASTM D3273-00, "Standard Test Method for Resistance to Growth of Mold on the Surface of Interior Coatings in an Environmental Chamber" and ASTM D3274-95, "Standard Test Method for Evaluating Degree of Surface Disfigurement of Paint Films by Microbial (Fungal or Algal) Growth or Soil and Dirt Accumulation".</p> <p>6.3.25 Reactive Penetrating Sealer Water Repellency: Reactive penetrating sealer water repellency shall be analyzed by ASTM C67-07, "Standard Test Methods for Sampling and Testing Brick and Structural Clay Tile"; or ASTM C97-02, "Standard Test Methods for Absorption and Bulk Specific Gravity of Dimension Stone"; or ASTM C140-06, "Standard Test Methods for Sampling and Testing Concrete Masonry Units and Related Units".</p> <p>6.3.26 Reactive Penetrating Sealer Water Vapor Transmission: Reactive penetrating sealer water vapor transmission shall be analyzed ASTM E96/E96M-05, "Standard Test Method for Water Vapor Transmission of Materials".</p> <p>6.3.27 Reactive Penetrating Sealer - Chloride Screening Applications: Reactive penetrating sealers shall be analyzed by National Cooperative Highway Research Report 244 (1981), "Concrete Sealers for the Protection of Bridge Structures".</p> <p>6.3.28 Stone Consolidants: Stone consolidants shall be tested using ASTM E2167-01, "Standard Guide for Selection and Use of Stone Consolidants".</p>	
7.0 Compliance Schedule	Persons subject to this rule shall be in compliance with this rule by October 31, 2001.	Persons subject to this rule shall be in compliance with this rule by the dates specified within the rule.	No change in the requirements, therefore, non-SIP version of rule is as stringent as SIP version.
8.0 Averaging Compliance Option	8.1 On or after January 1, 2003, in lieu of compliance with the specified limits in the Table of Standards for floor coatings; industrial maintenance coatings; primers, sealers, and undercoaters; quick-dry primers, sealers, and undercoaters; quick-dry enamels; roof coatings; rust		No change in the requirements, therefore, non-SIP version of rule is as stringent as SIP version.

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>preventative coatings; stains; waterproofing sealers, as well as flats and non-flats (excluding recycled coatings), manufacturers may average designated coatings such that their actual cumulative emissions from the averaged coatings are less than or equal to the cumulative emissions that would have been allowed under those limits over a compliance period not to exceed one year. Such manufacturers must also comply with the averaging provisions contained in this Section, as well as maintain and make available for inspection records for at least three years after the end of the compliance period. This Section shall cease to be effective on January 1, 2005, after which averaging will no longer be allowed.</p> <p>Per Section 8.1, averaging is no longer applicable. Therefore, Section 8.2 through 8.14 are not listed.</p>		

District Rule 4601 was amended (12/17/2009). As analyzed, each amended section of the non-SIP version of the rule is at least as stringent as, or more stringent than the corresponding section of the SIP version of the rule. Therefore, it is concluded that overall the non-SIP version of the rule is more stringent than the SIP version of the rule.