

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
ENGINEERING AND COMPLIANCE**

Coating, Printing and Aerospace Operations Team

PERMIT APPLICATION EVALUATION

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App. number(s)	468741,-45,-47,-49, -50, -53
Processed by	Jason Aspell
Reviewed by	Hamed Mandilawi
Date	10/26/07

**PERMIT TO CONSTRUCT/OPERATE EVALUATION
([modif./change of condition](#))**

Applicant's Name: Walker Wood Products, Inc.
Company ID No.: 144197
Mailing Address: 43195 Business Park Dr., Temecula, CA 92590
Equipment Address: 43195 Business Park Dr., Temecula, CA 92590

EQUIPMENT DESCRIPTION:

Application 468741 (modif. to A/N 442663, F75634):

MODIFICATION OF OVEN NO. 1 (PERMIT NO. F75634), CONSISTING OF:

OVEN NO. 1, CONVEYORIZED DRYING, CUSTOM, 6'-2" W. X 45'-0" L. X 10'-0" H., WITH TEN NATURAL GAS FIRED BURNERS, 30,000 BTU PER HOUR EACH.

BY THE ADDITION OF:
THREE ELECTRIC ELEMENTS, 6000 KW MAX EACH.

AND THE REMOVAL OF:
TEN NATURAL GAS FIRED BURNERS, 30,000 BTU PER HOUR EACH.

Application 468745 (modif. to A/N 442664, F75635):

MODIFICATION OF OVEN NO. 2 (PERMIT NO. F75635), CONSISTING OF:

OVEN NO. 2, CONVEYORIZED DRYING, CUSTOM, 6'-2" W. X 45'-0" L. X 10'-0" H., WITH TEN NATURAL GAS FIRED BURNERS, 30,000 BTU PER HOUR EACH.

BY THE ADDITION OF:
THREE ELECTRIC ELEMENTS, 6000 KW MAX EACH.

AND THE REMOVAL OF:
TEN NATURAL GAS FIRED BURNERS, 30,000 BTU PER HOUR EACH.

Application 468747 (modif. to A/N 449283, F81668):

MODIFICATION OF OVEN NO. 4 (PERMIT NO. F81668), CONSISTING OF:

OVEN NO. 4, CONVEYORIZED DRYING, CUSTOM, 4'-0" W. X 35'-0" L. X 6'-0" H., WITH FOUR NATURAL GAS FIRED BURNERS, 30,000 BTU PER HOUR EACH.

BY THE ADDITION OF:
THREE ELECTRIC ELEMENTS, 2000 KW MAX EACH.

AND THE REMOVAL OF:
TEN NATURAL GAS FIRED BURNERS, 30,000 BTU PER HOUR EACH.

Application 468749 (COC to A/N 444839, F78407):

SPRAY MACHINE NO.1, CEFLA FINISHING, ROTOSTAIN, 11'-0" W. X 20'-3" L. X 7'-3" H., WITH A ROTORY MULTI-SPRAY GUNS APPLICATION SYSTEM, AND A TWO STAGE EXHAUST FILTRATION SYSTEM.

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Application 468750 (modification to A/N 444840, F78406):

MODIFICATION OF SPRAY MACHINE NO. 2 (PERMIT NO. F78406), CONSISTING OF:

SPRAY MACHINE NO.2, CEFLA FINISHING, MODEL EASY 2000, 16'-0" W. X 10'-0" L. X 9'-0" H., WITH AN OVERSPRAY RECOVERY ROLLER SYSTEM, TWO FIXED POSITION MOUNTING ARMS EACH HOLDING UP TO SIX SPRAY GUNS, A 1-1/2 HP EXHAUST FAN WITH A THREE STAGE EXHAUST AIR FILTRATION SYSTEM, AND A 1 HP AIR INTAKE FAN WITH A TWO STAGE INTAKE AIR FILTRATION SYSTEM.

BY THE REMOVAL OF:
ONE STAGE OF EXHAUST FILTERS.

Application 468753:
TITLE V 5th REVISION

HISTORY:

The company submitted Application Nos. 468741,-45, -47, -49, -50, -53 on 5/19/07 for modifications to three drying oven permits, changes of condition to two spray machine permits, and a Title V Permit Revision application. The facility is in the Title V permit program, but is not a RECLAIM facility. The company is located in an industrial area with no nearby sensitive receptors. There have been no recent complaints filed against the facility within the past 3 years. During their last two inspections in March 2006 and February 2007, the company was determined to be operating in compliance.

This package will be the fifth revision to the facility's initial Title V permit issued on February 11, 2005. The modification and changes in condition are expected to result in a slight increase of emissions and will qualify as a De Minimis Permit Revision.

Application Nos. 468741 and 468745 are identical, and the second application will receive a 50% discount on the permit processing fees.

During processing it was determined that although the company had applied for a change of conditions for Spray Machine No. 2 it will be changed to a modification because the spray machine only has two stages of exhaust filters, not the three described in the permit description. A 50% higher fee will be assessed under Rule 301(c)(1)(D).

PROCESS DESCRIPTION:

The facility is a large wood cabinet manufacturer. The company is permitted for several paint spray booths, automated spray machines, and drying ovens to coat the cabinets. The facility operates under a facility wide VOC limit of 3,600 lb VOC per month. The facility has permit conditions requiring them to use super low VOC coatings. The ovens are all currently equipped with natural gas burners. The company is proposing to remove the natural gas burners on Oven Nos. 1, 2 and 4 and replace them with electric elements. None of the materials processed in the oven will change and the operating schedule will remain the same. The company is also proposing to change the requirements for the differential pressure across the exhaust filters on Spray Machines 1 and 2. When the permits were issued for the spray machines, they were given a default condition to limit the differential pressure to 0.25" of water. The company claims this is not sufficient, and initially requested the pressure differential limit should actually be 0.75" of water. The exhaust air actually passes through two sets of one inch thick filters. For one filter, the manufacturer's specifications claim an average removal efficiency of 99.97% up to 0.5" H₂O. The company has agreed to have a condition that limits the differential pressure across both filters to the manufacturer's maximum of 0.5" H₂O. None of the materials processed in the spray machine will change and the operating schedule will remain the same. The equipment will be operated for 52 wks/yr, 7 days/week, 24 hr/day.

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EMISSION CALCULATIONS:

The facility currently operates under facility wide VOC limit of 3600 lb VOC/month. The company's current emissions for the equipment involved in this project are summarized in the table below:

Application No.	Equipment	Current NSR 30-Day emissions					Subs. Application
		VOC	NOx	SOx	CO	PM10	
442663	Oven #1	0	1	0	1	0	468741
442664	Oven #2	0	1	0	1	0	468745
449283	Oven #4	0	1	0	1	0	468747
444839	Spray Machine #1	0	0	0	0	0	468749
444840	Spray Machine #2	0	0	0	0	0	468750
Total		0	3	0	3	0	

Due to the facility VOC limit, none of the above listed equipment have been allocated any VOC emissions, since they were allocated to another application. The ovens will no longer emit any NOx or CO emissions since they will not be any combustion of natural gas. The spray machines which result in the emission of PM and VOC, will remain at the same VOC emission levels. For Spray Machine No. 1, since the control efficiency of the filters is remaining the same (assumed 90% efficiency for PM₁₀), the PM emissions will not be changing. The pressure differential across the filters is just being corrected to reflect actual operating conditions. For Spray Machine No. 2, the removal of one stage of filters will result in an increase in PM emissions, however the emission increase will be negligible (less than one pound per day). For data entry purposes, there will be no difference, and the 30-Day PM10 emissions will remain at 0 lb/day. The stage being removed had a assumed control efficiency of 90%. All ROG emission entries will remain the same as the previous permits.

Therefore, this project will result in the net reduction of 3 lbs CO and 3 lbs NOx. The entries for all other criteria pollutants will be entered as 0 lb/day.

RULES/REGULATION EVALUATION:

RULE 212, PUBLIC NOTIFICATION

PARAGRAPH 212(c)(1):

This paragraph requires a public notice for all new or modified permit units that may emit air contaminants located within 1,000 feet from the outer boundary of a school. According to the MSN Yellow Pages, there is no school within the 1,000 feet of the permit unit. Therefore, this section does not apply for both of these situation,

PARAGRAPH 212(c)(2):

This section requires a public notice for all new or modified facilities that have on-site emission increases exceeding any of the daily maximums as specified by Rule 212(g). The proposed project will result in a NOx and CO emissions decrease for the entire facility, and VOC emissions will remain the same. There will be no PM increase for Spray Machine No. 1 since the control efficiency will remain the same. For Spray Machine No.2 the modification will result in a negligible increase of PM emissions (less than one pound per day), since the equipment will still have two stages of exhaust filtration. Therefore, a Rule 212(c)(2) notice will not be triggered. The PM emission increase will remain within the limits of Rule 212(g).

PARAGRAPH 212(c)(3):

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Each piece of equipment will result in a MICR of less than one in a million and a HIA and HIC less than one for their previous permit evaluations. The change in pressure differential will not affect the emissions of any toxic compounds from the booth since the collection efficiency will remain the same. Also, the removal of the filter stage from Spray Machine No. 3, will not affect the health risk since there are no toxic particulates in the coatings being captured by the filters. In addition, the removal of the natural gas combustion emissions will reduce the health risk of the ovens. Therefore, a public notice will not be required under this section.

PARAGRAPH 212(g):

This section requires a public notice for all new or modified sources that result in emission increases exceeding any of the daily maximums as specified by Rule 212(g). The spray machines will result in a slight increase in PM10 emissions (less than one pound per day), and the ovens will experience a decrease in emissions for NOx and CO. The PM emission increase will remain within the limits of Rule 212(g).

RULE 401, VISIBLE EMISSIONS

With the proper use and operation of the ovens and spray machines, no visible emissions are expected.

RULE 402, NUISANCE

With the proper operation of the spray machines, no nuisance problems are expected at this facility. The facility is located within an industrial area with no adjacent residences to the facility. There have been no recent complaints filed against the facility within the past 3 years, and this project will result in a decrease in emissions from the ovens. Compliance with this rule is expected.

RULE 404, PARTICULATE MATTER – CONCENTRATION

The facility will continue process the same materials in the spray machine and oven and the operation will not change. Since the control efficiency of the filters is not decreasing for Spray Machine No. 1, the emission of particulate matter will remain the same. The removal of the combustion of natural gas will decrease PM emissions from the oven. The equipment was previously evaluated for compliance with this rule and it is expected to continue to comply. The modification to Spray Machine No. 2 will result in a negligible increase of PM emissions, which is not expected to affect compliance with this rule since the equipment will continue to have two stage of exhaust filtration. Please refer to the prior evaluation for more details.

RULE 481, SPRAY COATING OPERATIONS

The spray machines will not be changing materials or exhaust rate. The equipment was previously evaluated for compliance with this rule, and the change in conditions will not affect compliance with this rule. Please refer to the prior evaluation for this equipment for more details.

RULE 1132, FURTHER CONTROL OF VOC EMISSIONS FROM HIGH-EMITTING SPRAY BOOTH FACILITIES

The facility complies with the requirements of this rule under the Alternative Compliance Plan under section (d)(2), by using VOC materials that are less than 85% lower than the applicable rule limits.

RULE 1136, WOOD PRODUCTS COATINGS

The company is required to use super low VOC coatings to comply with BACT requirements. This requirement is enforced by permit conditions. The VOC limits of the super low VOC coatings are well below the VOC requirements of this rule. Since the facility meets the VOC requirements of this rule, the spray machines are exempt from the transfer efficiency requirements under subsection (1)(8). Compliance with this rule is expected.

RULE 1171, SOLVENT CLEANING OPERATIONS

The facility uses acetone for their cleaning operations. Acetone is defined as an exempt compound under Rule 102. Compliance with this rule is expected.

REGULATION XIII

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

Neither the oven modification, nor the change of conditions to Spray Machine No. 1 will result in an increase in emissions for any criteria pollutant from the equipment. The oven will experience a decrease in emissions, and the spray machines will remain at the same emission level. Therefore, according to subsection 1303(a)(1), a new BACT evaluation is not applicable to this part of the project. The modification of Spray Machine No. 2 will result in a negligible emission increase. The equipment already complies with the BACT requirements because it is still equipped with dry filters for PM emissions and will use super low VOC containing coatings for VOC emissions. Compliance with this rule is expected.

RULE 1303(b)(1), MODELING

Neither the oven modification, nor the change of conditions to Spray Machine No. 1 will result in an increase in emissions for any criteria pollutant from the equipment. Therefore, the emissions from this equipment will remain less than the Screening Analysis values in Table A-1 in Rule 1303 as previously determined in the prior evaluations. The modification to Spray Machine No. 2 will result in a slight, but negligible increase in PM emissions, but will still remain less than the Screening Analysis values in Table A-1 in Rule 1303 as previously determined in the prior evaluations. Compliance with this rule is expected.

RULE 1303(b)(2), OFFSET

Neither the oven modification, nor the change of conditions to Spray Machine No. 1 will result in an increase in emissions for any criteria pollutant from the equipment. The emission increase for the modification to Spray Machine No. 2, will result in emission increases less than 0.5 lb per day and will not result in an increase in the 30-Day NSR emissions. Therefore, there are no emissions that need to be offset for this project. Compliance with this rule is expected.

RULE 1401, NEW SOURCE REVIEW OF TOXIC AIR CONTAMINANTS

Neither the oven modification, nor the change of conditions for Spray Machine No. 1 will result in an increase in emissions for any criteria pollutant from the equipment. The oven will experience a decrease in emissions, and the Spray Machine No. 1 will remain at the same emission level. Therefore, each piece of equipment will not result in an increase in health risk. Pursuant to subsection (g)(1)(B) of this rule, the requirements of subsection (d) will not apply to the modification and change of conditions. No further evaluation is required under this section for these pieces of equipment. All equipment will continue to operate with their current permit conditions restricting the usage of toxic materials.

For Spray Machine No. 2, there will be a slight increase in particulate emissions. This equipment was last evaluated for compliance with this rule in September 2005. The same version of the rule is still in effect and the coatings used have not changed. The MSDS show that there are only volatile toxic compounds, and no particulate toxic compounds, therefore the small increase in particulate emissions will not increase the emission of any toxic compounds. Therefore, this modification will also qualify under the exemption under subsection (g)(1)(B) of this rule. Compliance with this rule is expected. The equipment will continue to operate with their current permit conditions restricting the usage of toxic materials.

REGULATION XXX:

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This facility is not in the RECLAIM program. The proposed project is considered as a “de minimis significant permit revision” to the Title V permit for this facility.

Rule 3000(b)(6) defines a “de minimis significant permit revision” as any Title V permit revision where the cumulative emission increases of non-RECLAIM pollutants or hazardous air pollutants (HAPs) from these permit revisions during the term of the permit are not greater than any of the following emission threshold levels:

Air Contaminant	Daily Maximum (lbs/day)
HAP	30
VOC	30
NO _x	40
PM ₁₀	30
SO _x	60
CO	220

To determine if a project is considered as a “de minimis significant permit revision” for non-RECLAIM pollutants or HAPs, emission increases for non-RECLAIM pollutants or HAPs resulting from all permit revisions that are made after the issuance of the **initial Title V permit** shall be accumulated and compared to the above threshold levels. This proposed project is the **5th** permit revision to the **initial Title V permit** issued to this facility on **February 11, 2005**. The following table summarizes the cumulative emission increases resulting from all permit revisions since the **initial Title V permit** was issued:

Revision	HAP	VOC	NO _x	PM ₁₀	SO _x	CO
Previous Revisions	0	0	2	0	0	2
5 th revision: Modification to three ovens and change of condition to a spray machine and modification to a spray machine	0	0	0	0	0	0
Cumulative Total	0	0	2	0	0	2
Maximum Daily	30	30	40	30	60	220

Since the cumulative emission increases resulting from all permit revisions are not greater than any of the emission threshold levels, this proposed project is considered as a “de minimis significant permit revision”.

RECOMMENDATION

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

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PERMIT CONDITIONS:

The equipment will be subject to the permit conditions listed below:

OVEN NOS. 1, 2 AND 4 (Appl. Nos. 468741, -745, 747)

1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN ACCORDANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.
[RULE 204]
2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
[RULE 204]
3. COATING MATERIALS USED ON THE ARTICLES PROCESSED IN THIS EQUIPMENT SHALL NOT CONTAIN ANY CARCINOGENIC COMPOUND AS IDENTIFIED IN RULE 1401, TABLE I, WITH AN EFFECTIVE DATE OF MAY 2, 2003 OR EARLIER.
[RULE 1401]

Periodic Monitoring:

4. THE OPERATOR SHALL CONDUCT AN INSPECTION FOR VISIBLE EMISSIONS FROM ALL STACKS AND OTHER EMISSION POINTS OF THIS EQUIPMENT WHENEVER THERE IS A PUBLIC COMPLAINT OF VISIBLE EMISSIONS, WHENEVER VISIBLE EMISSIONS ARE OBSERVED, AND ON AN ANNUAL BASIS, AT LEAST, UNLESS THE EQUIPMENT DID NOT OPERATE DURING THE ENTIRE ANNUAL PERIOD. THE ROUTINE ANNUAL INSPECTION SHALL BE CONDUCTED WHILE THE EQUIPMENT IS IN OPERATION AND DURING DAYLIGHT HOURS.

IF ANY VISIBLE EMISSIONS (NOT INCLUDING CONDENSED WATER VAPOR) ARE DETECTED THAT LAST MORE THAN THREE MINUTES IN ANY ONE-HOUR, THE OPERATOR SHALL EITHER VERIFY AND CERTIFY WITHIN 24 HOURS THAT THE EQUIPMENT CAUSING THE EMISSION AND ANY ASSOCIATED AIR POLLUTION CONTROL EQUIPMENT ARE OPERATING NORMALLY ACCORDING TO THEIR DESIGN AND STANDARD PROCEDURES AND UNDER THE SAME CONDITIONS UNDER WHICH COMPLIANCE WAS ACHIEVED IN THE PAST AND EITHER

- A. TAKE CORRECTIVE ACTION(S) THAT ELIMINATES THE VISIBLE EMISSIONS WITHIN 24 HOURS AND REPORT THE VISIBLE EMISSIONS AS A POTENTIAL DEVIATION IN ACCORDANCE WITH THE REPORTING REQUIREMENTS IN SECTION K OF THIS PERMIT; OR
- B. HAVE A CARB-CERTIFIED SMOKE READER DETERMINE COMPLIANCE WITH THE OPACITY STANDARD, USING EPA METHOD 9 OR THE PROCEDURES IN THE CARB MANUAL "VISIBLE EMISSION EVALUATION", WITHIN THREE BUSINESS DAYS AND REPORT ANY DEVIATIONS TO AQMD.

THE OPERATOR SHALL KEEP THE RECORDS IN ACCORDANCE WITH THE RECORDKEEPING REQUIREMENTS IN SECTION K OF THIS PERMIT AND THE FOLLOWING RECORDS:

- A. STACK OR EMISSION POINT IDENTIFICATION;
- B. DESCRIPTION OF ANY CORRECTIVE ACTIONS TAKEN TO ABATE VISIBLE EMISSIONS;
- C. DATE AND TIME VISIBLE EMISSION WAS ABATED; AND
- D. VISIBLE EMISSION OBSERVATION RECORDED BY A CERTIFIED SMOKE READER.

[RULE 3004 (a)(4)]

Emissions And Requirements:

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5 THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS:

PM: RULE 404, SEE APPENDIX B FOR EMISSION LIMITS

SPRAY MACHINES NOS. 1 AND 2 (Appl. Nos. 468749, -450)

1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN ACCORDANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.
[RULE 204]
2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
[RULE 204]
3. THIS EQUIPMENT SHALL NOT BE OPERATED UNLESS ALL EXHAUST AIR PASSES THROUGH FILTER MEDIA WHICH IS AT LEAST TWO INCHES THICK.
[RULE 1303 (a)(1)-BACT]
4. A GAUGE SHALL BE INSTALLED TO INDICATE, IN INCHES OF WATER, THE STATIC PRESSURE DIFFERENTIAL ACROSS THE EXHAUST FILTERS. IN OPERATION, THE PRESSURE DIFFERENTIAL SHALL NOT EXCEED 0.5 INCH OF WATER.
[RULE 1303 (a)(1)-BACT]
5. ONLY THE FOLLOWING CATEGORIES OF COATINGS SHALL BE USED IN THIS EQUIPMENT. THE VOC CONTENT OF THE COATINGS SHALL NOT EXCEED THE FOLLOWING LIMITS:

SEALERS	0.20 LB-VOC/LB-SOLID
TOPCOATS	0.20 LB-VOC/LB-SOLID
HIGH SOLIDS STAIN	0.18 LB-VOC/LB-SOLID
LOW SOLID MATERIALS	0.58 LB-VOC/GALLON MATERIAL
PIGMENTED PRIMERS, SEALERS & UNDERCOATS	0.15 LB- VOC/LB-SOLID

ADEQUATE RECORDS SHALL BE MAINTAINED TO DEMONSTRATE COMPLIANCE WITH THIS CONDITION.

[RULE 1303(a)(1)-BACT, 1303 (b)(2)-OFFSET]

6. MATERIALS USED IN THIS EQUIPMENT SHALL NOT CONTAIN ANY CARCINOGENIC COMPOUND AS IDENTIFIED IN RULE 1401, TABLE I, WITH AN EFFECTIVE DATE OF MARCH 4, 2005 OR EARLIER.
[RULE 1401]

Periodic Monitoring:

7. THE OPERATOR SHALL PERFORM A WEEKLY INSPECTION OF THE EQUIPMENT AND FILTER MEDIA FOR LEAKS, BROKEN OR TORN FILTER MEDIA AND IMPROPERLY INSTALLED FILTER MEDIA. THE OPERATOR SHALL KEEP RECORDS, IN A MANNER APPROVED BY THE DISTRICT, FOR THE FOLLOWING PARAMETER(S) OR ITEM(S):
 - A. THE NAME OF THE PERSON PERFORMING THE INSPECTION AND/OR MAINTENANCE OF THE FILTER MEDIA;

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B. THE DATE, TIME AND RESULTS OF THE INSPECTION; AND

C. THE DATE, TIME AND DESCRIPTION OF ANY MAINTENANCE OR REPAIRS RESULTING FROM THE INSPECTION.

[RULE 3004 (a)(4)]

8. THE OPERATOR SHALL DETERMINE AND RECORD THE PRESSURE DROP ACROSS THE FILTER ONCE EVERY WEEK.

[RULE 3004 (a)(4)]

Emissions And Requirements:

9. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS:

VOC: RULE 1136, SEE APPENDIX B FOR EMISSION LIMITS

VOC: RULE 1171, SEE APPENDIX B FOR EMISSION LIMITS

VOC: RULE 109

PM: RULE 404, SEE APPENDIX B FOR EMISSION LIMITS

PM: RULE 481