

NOV 01 2010

Daryl Schenewark  
Custom Marble & Onyx  
PO Box 58170  
Modesto, CA 95358

**Re: Notice of Preliminary Decision - Federally Mandated Operating Permit  
District Facility # N-3715  
Project # N-1071279**

Dear Mr. Schenewark:

Enclosed for your review and comment is the District's analysis of Custom Marble & Onyx's application for the Federally Mandated Operating Permit for its polyester resin casting operation, 201 Winmoore Ave, Modesto, 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

cc: Juscelino Siongco, Permit Services Engineer

Attachments

**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: 661-392-5500 FAX: 661-392-5585



NOV 01 2010

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 - Federally Mandated Operating Permit  
District Facility # N-3715  
Project # N-1071279**

Dear Mr. Rios:

Enclosed for your review and comment is the District's analysis of Custom Marble & Onyx's application for the Federally Mandated Operating Permit for its polyester resin casting operation, 201 Winmoore Ave, Modesto, 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

cc: Juscelino Siongco, Permit Services Engineer

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NOV 01 2010

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

**Re: Notice of Preliminary Decision - Federally Mandated Operating Permit  
District Facility # N-3715  
Project # N-1071279**

Dear Mr. Tollstrup:

Enclosed for your review and comment is the District's analysis of Custom Marble & Onyx's application for the Federally Mandated Operating Permit for its polyester resin casting operation, 201 Winmoore Ave, Modesto, 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

cc: Juscelino Siongco, Permit Services Engineer

Attachments

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Modesto Bee

**NOTICE OF PRELIMINARY DECISION  
FOR THE PROPOSED ISSUANCE OF  
FEDERALLY MANDATED OPERATING PERMITS**

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District solicits public comment on the proposed issuance of the Federally Mandated Operating permits to Custom Marble & Onyx for its polyester resin casting operation, 201 Winmoore Ave, Modesto, California.

The District's analysis of the legal and factual basis for this proposed action, project #N-1071279, is available for public inspection at [http://www.valleyair.org/notices/public\\_notices\\_idx.htm](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 Federally Mandated Operating initial permits. If requested by the public, the District will hold a public hearing regarding issuance of this initial permit. For additional information, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900. Written comments on the proposed initial 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  
UNIFIED AIR POLLUTION CONTROL DISTRICT**

**CUSTOM MARBLE & ONYX**

**N-3715**

**PROPOSED ENGINEERING EVALUATION  
TABLE OF CONTENTS**

<b>Section.....</b>	<b>Page</b>
<b>I. PROPOSAL .....</b>	<b>1</b>
<b>II. FACILITY LOCATION.....</b>	<b>1</b>
<b>III. EQUIPMENT LISTING .....</b>	<b>1</b>
<b>IV. GENERAL PERMIT TEMPLATE USAGE .....</b>	<b>2</b>
<b>V. SCOPE OF EPA AND PUBLIC REVIEW .....</b>	<b>2</b>
<b>VI. APPLICABLE REQUIREMENTS ADDRESSED BY GENERAL PERMIT TEMPLATES .....</b>	<b>2</b>
<b>VIII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE.....</b>	<b>3</b>
<b>IX. COMPLIANCE .....</b>	<b>4</b>
<b>X. PERMIT SHIELD.....</b>	<b>16</b>
<b>XI. PERMIT CONDITIONS .....</b>	<b>16</b>

**ATTACHMENT A – DETAILED FACILITY PRINTOUT  
ATTACHMENT B – EXEMPT EQUIPMENT  
ATTACHMENT C – SJVUAPCD PERMITS**

# **TITLE V APPLICATION REVIEW**

Project #: N-1071279  
Deemed Complete: April 12, 2007

Engineer: Juscelino Siongco  
Date: October 15, 2010

Facility Number: N-3715  
Facility Name: Custom Marble & Onyx  
Mailing Address: PO Box 58170  
Modesto CA 95358

Contact Name: Jeffrey Adkins  
Phone: (916) 444-6666

Responsible Official: Daryl Schenewark  
Title: Secretary/Treasurer

## **I. PROPOSAL**

Custom Marble & Onyx is proposing that an initial Title V permit be issued for its existing polyester resin casting operation at 201 Winmoore Ave, Modesto, CA. The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with those applicable requirements, and to provide the legal and factual basis for proposed permit conditions.

## **II. FACILITY LOCATION**

Custom Marble & Onyx is located at 201 Winmoore Ave, in Stanislaus County, CA.

## **III. EQUIPMENT LISTING**

A detailed facility printout listing all permitted equipment at the facility is shown in Attachment A.

A summary of the exempt equipment categories which describe the insignificant activities or equipment at the facility not requiring a permit is shown in Attachment B. This equipment is not exempt from facility-wide requirements.

#### **IV. GENERAL PERMIT TEMPLATE USAGE**

The applicant is requesting to use the following model general permit templates:

A. SJV-UM-0-3, Facility-wide Umbrella General Permit Template

The applicant has requested to utilize template #SJV-UM-03, Facility-wide Umbrella General Permit Template for unit N-3715-0-1. Based on the information submitted on the Template Qualification Form, the applicant qualifies for the use of this template.

#### **V. SCOPE OF EPA AND PUBLIC REVIEW**

Certain segments of the proposed Operating Permit are based on model general permit templates that have been previously subject to EPA and public review. The terms and conditions from the model general permit templates are included in the proposed permit and are not subject to further EPA and public review.

For permit applications utilizing model general permit templates, public and agency comments on the District's proposed actions are limited to the applicant's eligibility for model general permit template, applicable requirements not covered by the model general permit template, and the applicable procedural requirements for issuance of Title V Operating Permits.

The following permit conditions, including their underlying applicable requirements, originate from model general permit templates and are not subject to further EPA or public review.

Conditions 1 through 40 of the requirements for permit unit N-3715-0-1.

#### **VI. APPLICABLE REQUIREMENTS ADDRESSED BY GENERAL PERMIT TEMPLATES**

District Rule 1100, Equipment Breakdown (amended December 17, 1992) (Non-SIP replacement for Stanislaus County Rule 111)

District Rule 1160, Emission Statements (adopted November 18, 1992)

District Rule 2010, Permits Required (amended December 17, 1992)

District Rule 2020, Exemptions (amended December 20, 2007)

District Rule 2031, Transfer of Permits (amended December 17, 1992)

District Rule 2040, Applications (amended December 17, 1992)

District Rule 2070, Standards for Granting Applications (amended December 17, 1992)

District Rule 2080, Conditional Approval (amended December 17, 1992)  
District Rule 2520, Sections 5.2, 9.1.1, 9.4, 9.5, 9.7, 9.8, 9.9, 9.13.1, 9.13.2, 9.16 and 10.0, Federally Mandated Operating Permits (amended June 21, 2001)  
District Rule 4101, Visible Emissions (amended February 17, 2005)  
District Rule 4601, Architectural Coatings (amended December 17, 2009)  
District Rule 8011, General Requirements (amended August 19, 2004)  
District Rule 8021, Construction, Demolition, Excavation and Other Earthmoving Activities (amended August 19, 2004)  
District Rule 8031, Bulk Materials (amended August 19, 2004)  
District Rule 8041, Carryout and Trackout (amended August 19, 2004)  
District Rule 8051, Open Areas (amended August 19, 2004)  
District Rule 8061, Paved and Unpaved Roads (amended August 19, 2004)  
District Rule 8071, Unpaved Vehicle/Equipment Traffic Areas (amended September 16, 2004)  
40 CFR Part 82, Subpart B and F, Stratospheric Ozone  
40 CFR Part 61, Subpart M, National Emission Standard for Asbestos

## **VII. APPLICABLE REQUIREMENTS NOT ADDRESSED BY GENERAL PERMIT TEMPLATES**

District New and Modified Stationary Source Review Rule  
District Rule 2520, Federally Mandate Operating Permits (amended June 21, 2001)  
District Rule 4201, Particulate Matter Concentration (amended December 17, 1992)  
District Rule 4202, Particulate Matter Emission Rate (amended December 17, 1992)  
District Rule 4684, Polyester Resin Operations (amended September 17, 2009)  
40 CFR Part 63, Subpart WWWW, National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production  
40 CFR Part 64 – Compliance Assurance Monitoring (CAM)

## **VIII. 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.

This facility is subject to the following rules that are not currently federally enforceable:

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

For this facility, condition 41 of the requirements for permit unit N-3715-0-1 is based on the rule listed above and is not Federally Enforceable through Title V.

## **IX. COMPLIANCE**

### **A. Requirements Addressed by Model General Permit Templates**

#### **1. Facility Wide Requirements**

The applicant is proposing to use a general permit template to address federally applicable facility-wide requirements. Section IV of template SJV-UM-0-3 includes a demonstration of compliance for all applicable requirements. Template conditions have been added to the facility wide requirements as condition numbers 1 through 40 to assure compliance with these requirements.

### **B. Requirements Not Addressed by Model General Permit Templates**

#### **1. New and Modified Stationary Source Review Rule (District NSR Rule)**

The permit units are subject to the District NSR Rule upon application for Authority to Construct (ATC). In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting Permit to Operate (PTO) were addressed to define how NSR permit terms should be incorporated into the Title V permit.

##### **a. Polyester Resin Operation for Synthetic Marble and Onyx Manufacturing: Gel Coating Operation Served by a Spray Booth (N-3715-1-5)**

- Condition 1 from the current PTO is removed and replaced with applicable 40 CFR 63 Subpart WWWW conditions included as conditions 20 through 31 on the requirements for the proposed permit.
- Conditions 2 and 3 from the current PTO are included as conditions 1 and 2 on the requirements for the proposed permit.

- Condition 4 from the current PTO is moved to the Facility-Wide permit as condition 41.
- Condition 5 from the current PTO is included as condition 3 on the requirements for the proposed permit.
- Condition 6 from the current PTO is moved to the Facility-Wide permit as condition 22.
- Conditions 7 through 23 from the current PTO have been included as conditions 4 through 18, 30, and 31 of the requirements for the proposed permit.

b. Polyester Resin Operation for Synthetic Marble and Onyx Manufacturing (N-3715-2-5)

- Condition 1 from the current PTO is removed and replaced with applicable 40 CFR 63 Subpart WWWW conditions included as conditions 14 through 23 on the requirements for the proposed permit.
- Conditions 2 and 3 from the current PTO are included as conditions 1 and 2 on the requirements for the proposed permit.
- Conditions 4 and 5 from the current PTO are moved to the Facility-Wide permit as conditions 41 and 22, respectively.
- Conditions 6 through 17 from the current PTO have been included as conditions 3 through 12, 22, and 23 of the requirements for the proposed permit.

c. A Milwaukee Grinder and a Gruber Grinding Booth Served by a Baghouse (N-3715-3-1)

- Conditions 1 and 2 from the current PTO are moved to the Facility-Wide permit as conditions 22 and 41.
- Conditions 3 through 10 from the current PTO are included as conditions 1 through 8 on the requirements for the proposed permit.

d. Polyester Resin Mixing and Polymer Casting Operation for Synthetic Marble and Onyx Manufacturing (N-3715-4-2)

- Condition 1 from the current PTO is removed and replaced with applicable 40 CFR 63 Subpart WWWW conditions included as conditions 16 through 25 on the requirements for the proposed permit.
- Conditions 2 and 3 from the current PTO are included as conditions 1 and 2 on the requirements for the proposed permit.
- Conditions 4 and 5 from the current PTO are moved to the Facility-Wide permit as conditions 41 and 22, respectively.

- Conditions 6 through 19 from the current PTO have been included as conditions 3 through 14, 24, and 25 of the requirements for the proposed permit.

## 2. District Rule 4201, Particulate Matter Concentration

The purpose of this rule is to protect the ambient air quality by establishing a particulate matter emission standard. Section 3.1 requires emissions to be at or below 0.1 grains of particulate matter per dry standard cubic foot of exhaust gas.

a. Polyester Resin Operation for Synthetic Marble and Onyx Manufacturing: Gel Coating Operation Served by a Spray Booth (N-3715-1-5)

- Condition 2 on the proposed permit assures compliance with this rule.

b. A Milwaukee Grinder and a Gruber Grinding Booth Served by a Baghouse (N-3715-3-1)

- Condition 1 on the proposed permit assures compliance with this rule.

## 3. District Rule 4202, Particulate Matter Concentration

The purpose of this rule is to limit particulate matter emissions by establishing allowable emission rates.

Section 4.0 of this rule, a person shall not discharge into the atmosphere PM emissions in excess of the maximum allowable limit ( $E_{max}$ ), in lb/hr, determined by the following equations:

$$E_{max} = 3.59 P^{0.62}, \text{ for Process weight (P) less than or equal to 30 tons/hr}$$

a. Polyester Resin Operation for Synthetic Marble and Onyx Manufacturing: Gel Coating Operation Served by a Spray Booth (N-3715-1-5)

- Condition 19 on the proposed permit assures compliance with this rule.

- b. Polyester Resin Operation for Synthetic Marble and Onyx Manufacturing (N-3715-2-5)
  - Condition 13 on the proposed permit assures compliance with this rule.
- c. A Milwaukee Grinder and a Gruber Grinding Booth Served by a Baghouse (N-3715-3-1)
  - Condition 9 on the proposed permit assures compliance with this rule.
- d. Polyester Resin Mixing and Polymer Casting Operation for Synthetic Marble and Onyx Manufacturing (N-3715-4-2)
  - Condition 15 on the proposed permit assures compliance with this rule.

#### **4. District Rule 4684, Polyester Resin Operations**

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

The rule was amended in September 17, 2009 to implement reasonably available control technology (RACT) requirements as recommended in the control techniques guidelines (CTG) for Fiberglass Boat Manufacturing Materials (EPA-453/R-08-004). The amended rule had not been included into the State Implementation Plan (SIP). Since this facility does not manufacture fiberglass boats, the current amendments do not apply. The facility continues to comply with all applicable requirements of the prior SIP approved September 20, 2007 amended rule.

- a. Polyester Resin Operation for Synthetic Marble and Onyx Manufacturing: Gel Coating Operation Served by a Spray Booth (N-3715-1-5)

Pursuant to District Rule 4684, Section 5.1.1.1 the facility is required to use low-VOC pigmented gel coats containing no more than 45% monomer by weight and low-VOC specialty resins and *clear gel coats containing no more than 50% monomer by weight*. Clear gel coats are only applied at this operation. The clear gel coats utilized at this operation contain a maximum of 47% monomer by weight, which is less than the applicable 50% monomer by weight limit. The clear gel-

coats are applied with a non-atomized applicator and therefore meets Section 5.1.2 of this rule that requires HVLP, air assisted airless, or airless gel coat application.

- Conditions 5, 6, 7, 8, 11 and 18 on the proposed permit assure compliance with this rule.

b. Polyester Resin Operation for Synthetic Marble and Onyx Manufacturing (N-3715-2-5)

Section 5.1.1.1 of this Rule requires the VOC content of resins to be limited to no more than 35% monomer by weight. The permitted polyester resins have a maximum Styrene Monomer Content of 34% monomer by weight that meet the rule requirement. The facility is only permitted to use organic solvents that do not exceed 25 g/L.

- Conditions 3, 4, 5, 9, and 12 on the proposed permit assure compliance with this rule.

c. Polyester Resin Mixing and Polymer Casting Operation for Synthetic Marble and Onyx Manufacturing (N-3715-4-2)

Section 5.1.1.1 of this Rule requires the VOC content of resins to be limited to no more than 35% monomer by weight. The permitted polyester resins have a maximum Styrene Monomer Content of 34% monomer by weight that meet the rule requirement. The facility is only permitted to use organic solvents that do not exceed 25 g/L.

- Conditions 4, 5, 6, 11, and 14 on the proposed permit assure compliance with this rule.

**5. 40 CFR Part 63, Subpart WWWW, National Emissions Standards for Hazardous Air Pollutants: Reinforced Plastic Composite Production**

This subpart establishes national emissions standards for hazardous air pollutants (NESHAP) for reinforced plastic composites production. According to §63.5785 (a) plastic composites production facility that is located at a major source of hazardous air pollutants (HAP) emissions is subject to Subpart WWWW. The major source threshold level in this context is 10 tons/yr or more for any single HAP, or 25 tons/yr or more for any combination of HAPs.

Styrene is the primary VOC emitted during gel coating, resin mixing, casting, and curing and assumed to constitute 100% of the VOC emitted by the facility. The annual emissions from the facility are limited to 12.5

tons/yr, which is greater than 10 tons/yr thresholds for single HAP. Therefore, the facility is subject to subpart WWWW.

Custom Marble and Onyx is an existing affected source category since construction of the source occurred before August 2, 2001. Therefore, requirements of existing affected source are applicable. Per §63.5800, Table 2, the facility must comply with all applicable requirements of subpart WWWW.

The requirements for each permit unit are given as follows:

a. Polyester Resin Operation for Synthetic Marble and Onyx Manufacturing: Gel Coating Operation Served by a Spray Booth (N-3715-1-5)

§63.5805(b) requires that all operations at existing facilities must meet the organic HAP emissions limits in Table 3 and the work practice standards in Table 4 to this subpart.

§63.5810(a) requires that the operator demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in Table 3 or 5 to this subpart.

The operation covered under this permit unit includes gel coat application. This operation falls under the category of an open molding, which specifically lists gel coat application. According to §63.5805(b), all operations at existing facilities not listed in §63.5805(a) must meet the organic HAP emissions limits in Table 3 and the work practice standards in Table 4 of subpart WWWW that apply, regardless of the quantity of HAP emitted.

§63.5810(a)(1) requires that the operator demonstrate that an individual resin or gel coat, as applied, meets the applicable emission limit in Table 3 or 5 to this subpart. The operator must calculate organic HAP emissions factors for each different process stream by using the appropriate equations in Table 1 to this subpart for open molding.

Custom Marble and Onyx's gel coat operations fall under the "Clear Production Gel Coat" category. This means the permit unit shall not emit more than 522 lb-VOC/ton of the gel coat used according to the HAP limit provided in Table 3 of subpart WWWW.

Using the equation in Table 1 to Subpart WWWW, open molding operation, nonatomized spray gel coat application, nonvapor-suppressed gel coat, with 33 percent or more HAP, the following

calculation shows that the HAP emission factor for the permit unit's limit of 47% monomer (Styrene) by weight is less with the HAP limit of 522 lb-VOC/ton.

$$\begin{aligned} \text{EF} &= ((0.4506 \times \% \text{HAP}) - 0.0505) \times 2000 \\ &= ((0.4506 \times 0.47) - 0.0505) \times 2000 \\ &= 322.6 \text{ lb-VOC/ton} < 522 \text{ lb-VOC/ton} \end{aligned}$$

§63.5900(a)(2) requires that the operator demonstrate continuous compliance with organic HAP emissions limits by maintaining an organic HAP emissions factor value less than or equal to the appropriate organic HAP emissions limit listed in Table 3 or 5 on a 12-month rolling average.

§63.5900(a)(4) requires compliance with the work practice standards in Table 4 to this subpart by performing the work practice required for the operation. Table 4 requires that for existing cleaning operation the operator must not use cleaning solvents that contain HAP, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin. The operator shall store HAP containing materials in closed or covered containers except during addition or removal of materials.

§63.5895(c) requires the operator collect and keep records of resin and gel coat use, organic HAP content, and operation where resin is used. Resin use records may be based on purchase records if the permittee can reasonably estimate how the resin is applied. The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier. Resin and gel coat use records are not required for the individual resins and gel coats that are demonstrated, as applied, to meet their applicable emission limits as defined in 40 CFR 63.5810(a). However records of resin and gel coat organic HAP content shall be retained and the list of these resins and gel coats shall be included and their application methods identified in the semiannual compliance reports.

§63.69505(a) requires the submission of all notifications in 40 CFR 63 Table 13 that apply by the dates specified.

§63.5915 requires the operator comply with the recordkeeping requirements of this section.

§63.5920(a) requires the operator to maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to 40 CFR 63.10(b)(1).

§63.5920(b) requires that each record be kept for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

§63.5910(a) requires that the operator submit each applicable report required by 40 CFR 63, Table 14.

- Conditions 20 through 31 on the proposed permit assure compliance with this rule.

b. Polyester Resin Operation for Synthetic Marble and Onyx Manufacturing: Polymer Casting Operation with a Gruber Systems Mixer (N-3715-2-5)

This permit includes resin mixing and polymer casting. The requirements for each operation are presented as follows.

Polymer Mixing Operation

The resin mix used in the casting operation meets the definition of a bulk molding compounds (BMC). The facility shall meet the requirements listed in Table 4 of subpart WWWW for all mixing or BMC manufacturing operations to satisfy §63.5805(b). These requirements are given as follows:

1. Use the mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
2. Close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety.
3. Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

For polymer casting mixing operations, containers with a surface area of 500 square inches or less may be open while active mixing is taking place.

The facility mixes small batches in the Gruber Model 103501 open top mixer. Per manufacturer's literature, the mixing vessel for this unit has an inside diameter of 23.5 inches. Based on this dimension, the exposed surface area is 434 square inches, which is less than 500 square inches. Therefore, the open top mixer is not subject to the above listed requirements.

§63.5900(a)(2) requires that the operator demonstrate continuous compliance with organic HAP emissions limits by maintaining an organic HAP emissions factor value less than or equal to the appropriate organic HAP emissions limit listed in Table 3 or 5 on a 12-month rolling average.

§63.5900(a)(4) requires compliance with the work practice standards in Table 4 to this subpart by performing the work practice required for the operation. Table 4 requires that for existing cleaning operation the operator must not use cleaning solvents that contain HAP, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin. The operator shall store HAP containing materials in closed or covered containers except during addition or removal of materials.

§63.5895(c) requires the operator collect and keep records of resin and gel coat use, organic HAP content, and operation where resin is used. Resin use records may be based on purchase records if the permittee can reasonably estimate how the resin is applied. The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier. Resin and gel coat use records are not required for the individual resins and gel coats that are demonstrated, as applied, to meet their applicable emission limits as defined in 40 CFR 63.5810(a). However records of resin and gel coat organic HAP content shall be retained and the list of these resins and gel coats shall be included and their application methods identified in the semiannual compliance reports.

§63.69505(a) requires the submission of all notifications in 40 CFR 63 Table 13 that apply by the dates specified.

§63.5915 requires the operator comply with the recordkeeping requirements of this section.

§63.5920(a) requires the operator to maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to 40 CFR 63.10(b)(1).

§63.5920(b) requires that each record be kept for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

§63.5910(a) requires that the operator submit each applicable report required by 40 CFR 63, Table 14.

- Conditions 14 through 23 on the proposed permit assure compliance with this rule.
- c. Polyester Resin Mixing and Polymer Casting Operation for Synthetic Marble and Onyx Manufacturing Consisting of a Gruber Systems Autocaster Economizer Continuous Casting Machine (N-3715-4-2)

This permit includes resin mixing and polymer casting. The requirements for each operation are presented as follows.

Resin Mixing Operation

The resin mix used in the casting operation meets the definition of a bulk molding compounds (BMC). The facility shall meet the requirements listed in Table 4 of subpart WWWW to satisfy §63.580 (b). These requirements are given as follows:

1. Use the mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation.
2. Close any mixer vents when actual mixing is occurring, except that venting is allowed during addition of materials, or as necessary prior to adding materials or opening the cover for safety.
3. Keep the mixer covers closed while actual mixing is occurring except when adding materials or changing covers to the mixing vessels.

For polymer casting mixing operations, containers with a surface area of 500 square inches or less may be open while active mixing is taking place.

This permit unit utilizes the Gruber Autocaster Economizer continuous casting machine to perform almost all of the resin mixing in the facility. In the Autocaster, the mixing is conducted inside a barrel with an auger that has an opening surface area of not exceeding 500 square inches. Therefore, the Autocaster is not subject to the above listed requirements.

§63.5900(a)(2) requires that the operator demonstrate continuous compliance with organic HAP emissions limits by maintaining an organic HAP emissions factor value less than or equal to the appropriate organic HAP emissions limit listed in Table 3 or 5 on a 12-month rolling average.

§63.5900(a)(4) requires compliance with the work practice standards in Table 4 to this subpart by performing the work practice required for the operation. Table 4 requires that for existing cleaning operation the operator must not use cleaning solvents that contain HAP, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any equipment that directly contacts resin. The operator shall store HAP containing materials in closed or covered containers except during addition or removal of materials.

§63.5895(c) requires the operator collect and keep records of resin and gel coat use, organic HAP content, and operation where resin is used. Resin use records may be based on purchase records if the permittee can reasonably estimate how the resin is applied. The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier. Resin and gel coat use records are not required for the individual resins and gel coats that are demonstrated, as applied, to meet their applicable emission limits as defined in 40 CFR 63.5810(a). However records of resin and gel coat organic HAP content shall be retained and the list of these resins and gel coats shall be included and their application methods identified in the semiannual compliance reports.

§63.69505(a) requires the submission of all notifications in 40 CFR 63 Table 13 that apply by the dates specified.

§63.5915 requires the operator comply with the recordkeeping requirements of this section.

§63.5920(a) requires the operator to maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to 40 CFR 63.10(b)(1).

§63.5920(b) requires that each record be kept for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.

§63.5910(a) requires that the operator submit each applicable report required by 40 CFR 63, Table 14.

- Conditions 16 through 25 on the proposed permit assure compliance with this rule.

## 6. 40 CFR Part 64, CAM

40 CFR Part 64 requires Compliance Assurance Monitoring (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 of greater than the major source thresholds.

a. Polyester Resin Operation for Synthetic Marble and Onyx Manufacturing: Gel Coating Operation Served by a Spray Booth (N-3715-1-5)

The permit unit has emissions limits for PM<sub>10</sub> and VOC. There is no add-on control for VOC, therefore, CAM is not applicable for VOC. The permit unit may be subject to CAM for PM<sub>10</sub> since it has an add-on control in the form of a spray booth with 90% control efficiency. However, the pre-control PM<sub>10</sub> potential to emit is less than the major source threshold of 140,000 lb-PM<sub>10</sub>/year as shown below. Therefore, this unit is not subject to CAM for PM<sub>10</sub>.

From Project N-1054005, the annual controlled PM<sub>10</sub> = 4,528 lb-PM<sub>10</sub>/yr.

Uncontrolled PM<sub>10</sub> = 4,528 lb/yr / (1-0.90) = 45,280 lb-PM<sub>10</sub>/yr

b. Polyester Resin Operation for Synthetic Marble and Onyx Manufacturing: Polymer Casting Operation with a Gruber Systems Mixer (N-3715-2-5)

The permit unit has emissions limits for PM<sub>10</sub> and VOC. There are no add-on controls for PM<sub>10</sub> and VOC, therefore, CAM is not applicable for PM<sub>10</sub> and VOC.

c. A Milwaukee Grinder and a Gruber Grinding Booth Served by a Baghouse (N-3715-3-1)

The emissions unit has emissions limits for PM<sub>10</sub>. The unit may be subject to CAM for PM<sub>10</sub> since it has an add-on control in the form of a baghouse with 99% control efficiency (Initial permitting action for permit 6-111-03). However, the pre-control PM<sub>10</sub> potential to emit is

less than the major source threshold of 140,000 lb-PM<sub>10</sub>/year as shown below. Therefore, this unit is not subject to CAM for PM<sub>10</sub>.

$$\begin{aligned}\text{Uncontrolled PM}_{10} &= (0.6 \text{ lb/day} \times 365 \text{ day/yr}) / (1-0.90) \\ &= \underline{21,900 \text{ lb-PM}_{10}/\text{yr}}\end{aligned}$$

- d. Polyester Resin Mixing and Polymer Casting Operation for Synthetic Marble and Onyx Manufacturing Consisting of a Gruber Systems Autocaster Economizer Continuous Casting Machine (N-3715-4-2)

The permit unit has emissions limits for PM<sub>10</sub> and VOC. There are no add-on controls for PM<sub>10</sub> and VOC, therefore, CAM is not applicable for PM<sub>10</sub> and VOC.

## **X. 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**

By using the model general permit template listed in Section IV of this evaluation, the applicant has requested that a permit shield be issued for requirements addressed in the template. The basis for each permit shield is discussed in the Permit Shield section of each template.

## **XI. PERMIT CONDITIONS**

See draft operating permit beginning on the following page.

# San Joaquin Valley Air Pollution Control District

FACILITY: N-3715-0-1

EXPIRATION DATE: 04/30/2011

## FACILITY-WIDE REQUIREMENTS

1. {4362} 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
2. {4363} 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
3. {4364} 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
4. {4365} 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 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. {4366} 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, 9.9.1 and 9.13.1] Federally Enforceable Through Title V Permit
6. {4367} 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
7. {4368} 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
8. {4369} 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: CUSTOM MARBLE & ONYX

Location: 201 WINMOORE AVE, MODESTO, CA 95358

N-3715-0-1; Oct 15 2010 11:28AM - SIONGCOJ

9. {4370} 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
10. {4371} 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
11. {4372} 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
12. {4373} 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
13. {4374} 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
14. {4375} 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
15. {4376} 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
16. {4377} 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
17. {4378} 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
18. {4379} 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
19. {4380} 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
20. {4381} 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
21. {4382} 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.

22. {4383} 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 (02/17/05). 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
23. {4384} 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 Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 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
24. {4385} All VOC-containing materials 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
25. {4386} 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
26. {4387} 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
27. {4388} 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 Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. {4389} 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 Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
29. {4390} 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 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8021 and 8011] Federally Enforceable Through Title V Permit
30. {4391} 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 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8031 and 8011] Federally Enforceable Through Title V Permit
31. {4392} 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 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8041 and 8011] Federally Enforceable Through Title V Permit
32. {4393} 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 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8051 and 8011] Federally Enforceable Through Title V Permit
33. {4394} 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 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8061 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.

34. {4395} Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 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 (9/16/2004) or Rule 8011 (8/19/2004). [District Rule 8071 and Rule 8011] Federally Enforceable Through Title V Permit
35. {4396} 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
36. {4397} 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
37. {4398} 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
38. {4399} 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
39. {4400} 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), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. 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 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
42. On month, day, year, 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]

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: N-3715-1-5

EXPIRATION DATE: 04/30/2011

## EQUIPMENT DESCRIPTION:

POLYESTER RESIN OPERATION FOR SYNTHETIC MARBLE AND ONYX MANUFACTURING; GEL COATING OPERATION SERVED BY A SPRAY BOOTH AND AN EXEMPT 0.095 MMBTU/HR NATURAL GAS-FIRED DRYING OVEN

## PERMIT UNIT REQUIREMENTS

1. VOC emissions from the entire facility shall not exceed 25,873 pounds during any calendar year. [District NSR Rule] Federally Enforceable Through Title V Permit
2. VOC emissions from the entire facility shall not exceed 19,999 pounds during any one quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. All gel coating shall be conducted in the booth with filters in place and the fan(s) operating. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Only HVLP, electrostatic, airless, or air assisted airless application equipment shall be used, and shall be operated in accordance with the manufacturer's recommendations. [District NSR Rule and 4684] Federally Enforceable Through Title V Permit
6. The owner or operator shall not use organic solvents for cleaning operations that exceed any of the following VOC limits: For product cleaning during manufacturing process or surface preparation for coating application: 25 g/L; For repair and maintenance cleaning: 25 g/L; for cleaning of polyester resin application equipment: 25 g/L. [District Rule 4684] Federally Enforceable Through Title V Permit
7. An owner or operator shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as paper, cloth, 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] Federally Enforceable Through Title V Permit
8. VOC content of clear gel coats used shall not exceed 47% monomer (Styrene) by weight. [District NSR Rule and 4684] Federally Enforceable Through Title V Permit
9. VOC emissions shall not exceed 120.0 pounds during any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
10. PM10 emissions shall not exceed 21.0 pounds during any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
11. The owner or operator shall keep a record of the following: 1) Daily records of the type and quantity of all resins, catalysts, and cleaning materials used in each operation, 2) Records of the VOC content, in weight percent, of all polyester resin materials used or stored at the facility, and 3) Records of the VOC content of all cleaning materials used and stored at the stationary source. [District Rule 4684] 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. The permittee shall maintain the daily records of VOC emissions from this permit unit in pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The permittee shall maintain cumulative monthly, quarterly, and yearly records of VOC emitted from the entire facility in pounds. [District NSR Rule] Federally Enforceable Through Title V Permit
14. VOC emissions from the gelcoating operation shall be calculated as follows: VOC Emissions = VOC Gelcoats + VOC Cleaning Solvents + VOC Mold Release Agent. [District NSR Rule] Federally Enforceable Through Title V Permit
15. VOC Gelcoat = Gelcoat Usage (lb/day) x 1 ton/2000 lb x appropriate emissions factor from the American Composites Manufacturing Association Emissions Factors for Open Molding of Composites table (9/25/03) (lb/ton). [District NSR Rule] Federally Enforceable Through Title V Permit
16. VOC Cleaning Solvents = Cleaning Solvent Usage (lb/day) x Cleaning Solvent VOC content from the MSDS sheet or Product Data Sheet (lb-VOC/lb-Cleaning Solvent). [District NSR Rule] Federally Enforceable Through Title V Permit
17. VOC Mold Release Agent = Mold Release agent Usage (lb/day) x Mold Release Agent VOC content available from the manufacturer (lb-VOC/lb-Mold Release Agent). [District NSR Rule] Federally Enforceable Through Title V Permit
18. All records shall be retained on site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070 and 4684] Federally Enforceable Through Title V Permit
19. Particulate matter emissions shall not exceed the hourly rate as calculated using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
20. The organic Hazardous Air Pollutant (HAP) emissions limits shall not exceed 522 lb HAP/ton gel coat as applied. [40 CFR 63.5835(a)] Federally Enforceable Through Title V Permit
21. The HAP emissions factor (EF) shall be calculated using  $EF = ((0.4506 \times \%HAP) - 0.0505) \times 2000$ , where percent HAP means total weight of percent of organic HAP (styrene) in the resin or gel coat prior to the addition of fillers, catalyst, and promoters. [40 CFR 63.5795 and 40 CFR 63, Table 1] Federally Enforceable Through Title V Permit
22. Compliance with organic HAP emissions limits shall be demonstrated by maintaining an organic HAP emissions factor value less than or equal to 522 lb/ton on a 12-month rolling average, and/or by including in each compliance report a statement that individual resins and gel coats, as applied, meet the organic HAP emissions limits. [40 CFR 63.5900(a)(2)] Federally Enforceable Through Title V Permit
23. Permittee shall collect and keep records of resin and gel coat use, organic HAP content, and operation where resin is used. Resin use records may be based on purchase records if the permittee can reasonably estimate how the resin is applied. The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier. [40 CFR 63.5895(c)] Federally Enforceable Through Title V Permit
24. Resin and gel coat use records are not required for the individual resins and gel coats that are demonstrated, as applied, to meet their applicable emission limits as defined in 40 CFR 63.5810(a). However records of resin and gel coat organic HAP content shall be retained and the list of these resins and gel coats shall be included and their application methods identified in the semiannual compliance reports. [40 CFR 63.5895(c)] Federally Enforceable Through Title V Permit
25. The permittee shall submit all of the notifications in 40 CFR 63 Table 13 that apply by the dates specified. [40 CFR 63.5905(a)] Federally Enforceable Through Title V Permit
26. The permittee shall comply with the recordkeeping requirements of 40 CFR 63.5915. [40 CFR 63.5915] Federally Enforceable Through Title V Permit
27. The permittee shall maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to 40 CFR 63.10(b)(1). [40 CFR 63.5920(a)] Federally Enforceable Through Title V Permit
28. The permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [40 CFR 63.5920(b)] 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.

29. The permittee shall submit each applicable report required by 40 CFR 63, Table 14. [40 CFR 63.5910(a)] Federally Enforceable Through Title V Permit
30. The owner or operator shall not use cleaning solvents that contain hazardous air pollutant (HAP), except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from the application equipment provided that the application equipment directly contacts the resin. [40 CFR 63.5805(b), Table 4] Federally Enforceable Through Title V Permit
31. The owner or operator shall store HAP containing materials in closed or covered containers except during addition or removal of materials. Bulk HAP containing materials storage tanks may be vented as necessary for safety. [40 CFR 63.5805(b), Table 4] 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: N-3715-2-5

EXPIRATION DATE: 04/30/2011

## EQUIPMENT DESCRIPTION:

POLYESTER RESIN OPERATION FOR SYNTHETIC MARBLE AND ONYX MANUFACTURING. RESIN MIXING AND POLYMER CASTING OPERATION WITH A GRUBER SYSTEMS MODEL 103501 MIXER

## PERMIT UNIT REQUIREMENTS

1. VOC emissions from the entire facility shall not exceed 25,873 pounds during any calendar year. [District NSR Rule] Federally Enforceable Through Title V Permit
2. VOC emissions from the entire facility shall not exceed 19,999 pounds during any one quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The owner or operator shall not use organic solvents for cleaning operations that exceed any of the following VOC limits: For product cleaning during manufacturing process or surface preparation for coating application: 25 g/L; For repair and maintenance cleaning: 25 g/L; for cleaning of polyester resin application equipment: 25 g/L. [District Rule 4684] Federally Enforceable Through Title V Permit
4. An owner or operator shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as paper, cloth, 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] Federally Enforceable Through Title V Permit
5. VOC content of polyester resins used shall not exceed 34% monomer (Styrene) by weight. [District NSR Rule and 4684] Federally Enforceable Through Title V Permit
6. VOC emissions shall not exceed 60.0 pounds during any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
7. PM10 emissions shall not exceed 0.8 pounds during any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Calculation of the daily and annual VOC emissions shall be performed as follows: Resin Usage (lb/day, lb/year) x Resin Styrene Content (% by weight) x 0.03. [District NSR Rule] Federally Enforceable Through Title V Permit
9. The owner or operator shall keep a record of the following: 1) Daily records of the type and quantity of all resins, catalysts, and cleaning materials used in each operation, 2) Records of the VOC content, in weight percent, of all polyester resin materials used or stored at the facility, and 3) Records of the VOC content of all cleaning materials used and stored at the stationary source. [District Rule 4684] Federally Enforceable Through Title V Permit
10. The permittee shall maintain the daily records of VOC emissions from this permit unit in pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
11. The permittee shall maintain cumulative monthly, quarterly, and yearly records of VOC emitted from the entire facility in pounds. [District NSR Rule] Federally Enforceable Through Title V Permit
12. All records shall be retained on site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070 and 4684] 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.

13. Particulate matter emissions shall not exceed the hourly rate as calculated using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
14. The exposed surface area of the mixing vessel shall not exceed 500 square inches when active mixing is taking place. [40 CFR 63.5805(b) Table 4] Federally Enforceable Through Title V Permit
15. Permittee shall collect and keep records of resin and gel coat use, organic HAP content, and operation where resin is used. Resin use records may be based on purchase records if the permittee can reasonably estimate how the resin is applied. The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier. [40 CFR 63.5895(c)] Federally Enforceable Through Title V Permit
16. Resin and gel coat use records are not required for the individual resins and gel coats that are demonstrated, as applied, to meet their applicable emission limits as defined in 40 CFR 63.5810(a). However records of resin and gel coat organic HAP content shall be retained and the list of these resins and gel coats shall be included and their application methods identified in the semiannual compliance reports. [40 CFR 63.5895(c)] Federally Enforceable Through Title V Permit
17. The permittee shall submit all of the notifications in 40 CFR 63 Table 13 that apply by the dates specified. [40 CFR 63.5905(a)] Federally Enforceable Through Title V Permit
18. The permittee shall comply with the recordkeeping requirements of 40 CFR 63.5915. [40 CFR 63.5915] Federally Enforceable Through Title V Permit
19. The permittee shall maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to 40 CFR 63.10(b)(1). [40 CFR 63.5920(a)] Federally Enforceable Through Title V Permit
20. The permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [40 CFR 63.5920(b)] Federally Enforceable Through Title V Permit
21. The permittee shall submit each applicable report required by 40 CFR 63, Table 14. [40 CFR 63.5910(a)] Federally Enforceable Through Title V Permit
22. The owner or operator shall not use cleaning solvents that contain hazardous air pollutant (HAP), except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from the application equipment provided that the application equipment directly contacts the resin. [40 CFR 63.5805(b), Table 4] Federally Enforceable Through Title V Permit
23. The owner or operator shall store HAP containing materials in closed or covered containers except during addition or removal of materials. Bulk HAP containing materials storage tanks may be vented as necessary for safety. [40 CFR 63.5805(b), Table 4] 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:** N-3715-3-1

**EXPIRATION DATE:** 04/30/2011

**EQUIPMENT DESCRIPTION:**

A MILWAUKEE GRINDER AND A GRUBER GRINDING BOOTH SERVED BY A GRUBER MODEL #610596 BAGHOUSE

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. All grinding operations shall be performed in the grinding booth. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The grinding booth fan shall be turned on prior to grinding. [District NSR Rule] Federally Enforceable Through Title V Permit
4. There shall be no visible emissions from the baghouse. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District NSR Rule] Federally Enforceable Through Title V Permit
7. PM10 emissions shall not exceed 0.6 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
8. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070 & 4684] Federally Enforceable Through Title V Permit
9. Particulate matter emissions shall not exceed the hourly rate as calculated using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour. [District Rule 4202] 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: N-3715-4-2

EXPIRATION DATE: 04/30/2011

## EQUIPMENT DESCRIPTION:

POLYESTER RESIN MIXING AND POLYMER CASTING OPERATION FOR SYNTHETIC MARBLE AND ONYX MANUFACTURING CONSISTING OF A GRUBER SYSTEMS INC. AUTOCASER ECONOMIZER CONTINUOUS CASTING MACHINE

## PERMIT UNIT REQUIREMENTS

1. VOC emissions from the entire facility shall not exceed 25,873 pounds during any calendar year. [District NSR Rule] Federally Enforceable Through Title V Permit
2. VOC emissions from the entire facility shall not exceed 19,999 pounds during any one quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The owner or operator shall not use organic solvents for cleaning operations that exceed any of the following VOC limits: For product cleaning during manufacturing process or surface preparation for coating application: 25 g/L; For repair and maintenance cleaning: 25 g/L; for cleaning of polyester resin application equipment: 25 g/L. [District Rule 4684] Federally Enforceable Through Title V Permit
5. An owner or operator shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as paper, cloth, 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] Federally Enforceable Through Title V Permit
6. VOC content of polyester resins used shall not exceed 34% monomer (Styrene) by weight. [District NSR Rule and 4684] Federally Enforceable Through Title V Permit
7. VOC emissions shall not exceed 40.8 pounds during any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
8. PM10 emissions shall not exceed 0.9 pound in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Calculation of the daily and annual VOC emissions shall be performed as follows: Resin Usage (lb/day, lb/year) x Resin Styrene Content (% by weight) x 0.015. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Calculation of the daily PM10 emissions shall be performed as follows: Filler Material Usage (lb/day) x 0.078 lb PM10/ton x 1 ton/2,000 lb. [District NSR Rule] Federally Enforceable Through Title V Permit
11. The owner or operator shall keep a record of the following: 1) Daily records of the type and quantity of all resins, catalysts, and cleaning materials used in each operation, 2) Records of the VOC content, in weight percent, of all polyester resin materials used or stored at the facility, and 3) Records of the VOC content of all cleaning materials used and stored at the stationary source. [District Rule 4684] Federally Enforceable Through Title V Permit
12. The permittee shall maintain the daily records of VOC and PM10 emissions from this permit unit in pounds per day. [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.

13. The permittee shall maintain cumulative monthly, quarterly, and yearly records of VOC emitted from the entire facility in pounds. [District NSR Rule] Federally Enforceable Through Title V Permit
14. All records shall be retained on site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070 and 4684] Federally Enforceable Through Title V Permit
15. Particulate matter emissions shall not exceed the hourly rate as calculated using the equation  $E = 3.59 \times P^{0.62}$ ; P is less than or equal to 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
16. The exposed surface area of the mixing barrel shall not exceed 500 square inches when active mixing is taking place. [40 CFR 63.5805(b) Table 4] Federally Enforceable Through Title V Permit
17. Permittee shall collect and keep records of resin and gel coat use, organic HAP content, and operation where resin is used. Resin use records may be based on purchase records if the permittee can reasonably estimate how the resin is applied. The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier. [40 CFR 63.5895(c)] Federally Enforceable Through Title V Permit
18. Resin and gel coat use records are not required for the individual resins and gel coats that are demonstrated, as applied, to meet their applicable emission limits as defined in 40 CFR 63.5810(a). However records of resin and gel coat organic HAP content shall be retained and the list of these resins and gel coats shall be included and their application methods identified in the semiannual compliance reports. [40 CFR 63.5895(c)] Federally Enforceable Through Title V Permit
19. The permittee shall submit all of the notifications in 40 CFR 63 Table 13 that apply by the dates specified. [40 CFR 63.5905(a)] Federally Enforceable Through Title V Permit
20. The permittee shall comply with the recordkeeping requirements of 40 CFR 63.5915. [40 CFR 63.5915] Federally Enforceable Through Title V Permit
21. The permittee shall maintain all applicable records in such a manner that they can be readily accessed and are suitable for inspection according to 40 CFR 63.10(b)(1). [40 CFR 63.5920(a)] Federally Enforceable Through Title V Permit
22. The permittee shall keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [40 CFR 63.5920(b)] Federally Enforceable Through Title V Permit
23. The permittee shall submit each applicable report required by 40 CFR 63, Table 14. [40 CFR 63.5910(a)] Federally Enforceable Through Title V Permit
24. The owner or operator shall not use cleaning solvents that contain hazardous air pollutant (HAP), except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from the application equipment provided that the application equipment directly contacts the resin. [40 CFR 63.5805(b), Table 4] Federally Enforceable Through Title V Permit
25. The owner or operator shall store HAP containing materials in closed or covered containers except during addition or removal of materials. Bulk HAP containing materials storage tanks may be vented as necessary for safety. [40 CFR 63.5805(b), Table 4] Federally Enforceable Through Title V Permit

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

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# Attachment A

## Detailed Facility Printout

**Detailed Facility Report**  
For Facility=3715 and excluding Deleted Permits  
Sorted by Facility Name and Permit Number

<b>CUSTOM MARBLE &amp; ONYX</b> <b>201 WINMOORE AVE</b> <b>MODESTO, CA 95358</b>	<b>FAC #</b> <b>STATUS:</b> <b>TELEPHONE:</b>	<b>N 3715</b> <b>A</b> <b>2095312200</b>	<b>TYPE:</b> <b>TOXIC ID:</b>	<b>TitleV</b>	<b>EXPIRE ON:</b> <b>AREA:</b> <b>INSP. DATE:</b>	<b>04/30/2011</b> <b>16 /</b> <b>02/11</b>
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PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
N-3715-1-4	5 hp Electric Motors	3020-01 A	1	87.00	87.00	A	POLYESTER RESIN OPERATION FOR SYNTHETIC MARBLE AND ONYX MANUFACTURING: GEL COATING OPERATION SERVED BY A SPRAY BOOTH AND AN EXEMPT 0.095 MMBTU/HR NATURAL GAS-FIRED DRYING OVEN
N-3715-2-4	2 hp Electric Motor	3020-01 A	1	87.00	87.00	A	POLYESTER RESIN OPERATION FOR SYNTHETIC MARBLE AND ONYX MANUFACTURING: RESIN MIXING AND POLYMER CASTING OPERATION WITH A GRUBER SYSTEMS MODEL 103501 MIXER
N-3715-3-0	15 HP MOTOR	3020-01 A	1	87.00	87.00	A	A MILWAUKEE GRINDER AND A GRUBER GRINDING BOOTH SERVED BY A GRUBER MODEL #610596 BAGHOUSE
N-3715-4-1	15 hp Electric Motors	3020-01 A	1	87.00	87.00	A	POLYESTER RESIN MIXING AND POLYMER CASTING OPERATION FOR SYNTHETIC MARBLE AND ONYX MANUFACTURING CONSISTING OF A GRUBER SYSTEMS INC. AUTOCASTER ECONOMIZER CONTINUOUS CASTING MACHINE

Number of Facilities Reported: 1

**Attachment B**

**Exempt Equipment**

**San Joaquin Valley  
Unified Air Pollution Control District  
Title V Application - INSIGNIFICANT ACTIVITIES**

COMPANY NAME: **CUSTOM MARBLE & ONYX**

FACILITY ID: **N - 3715**

Check the box next to the exemption category from Rule 2020 which describes any insignificant activity or equipment at your facility not requiring a permit.

Exemption Category	Rule 2020 Citation	√	Exemption Category	Rule 2020 Citation	√
Structure or incinerator assoc. with a structure designed as a dwelling for 4 families or less	4.1		Containers used to store refined lubricating oils	6.6.8	
Locomotives, airplanes, and watercraft used to transport passengers or freight	4.4		Unvented pressure vessels used exclusively to store liquified gases or assoc with exempt equipment	6.6.9 or 6.13	
Natural gas or LPG-fired boilers or other indirect heat transfer units of 5 MMBtu/hr or less	6.1.1	√	Portable tanks used exclusively to store produced fluids for ≤ six months	6.6.10	
Piston-type i.c.engine with maximum continuous rating of 50 braking horsepower (bhp) or less	6.1.2		Mobile transport tanks on delivery vehicles of VOCs	6.6.11	
Gas turbine engines with maximum heat input rating of 3 MMBtu/hr or less	6.1.3		Loading racks used for the transfer of less than 4,000 gal/day of unheated organic material with initial boiling point ≥ 302 F or of fuel oil with specific gravity ≥ 0.8251	6.7.1.1	
Space heating equipment other than boilers	6.1.4	√	Loading racks used for the transfer of asphalt, crude or residual oil stored in exempt tanks, or crude oil with specific gravity ≥ 0.8762	6.7.1.2	
Cooling towers with a circulation rate less than 10,000 gal/min, and that are not used for cooling of process water, or water from barometric jets or condensers++	6.2		Equipment used exclusively for the transfer of refined lubricating oil	6.7.2	
Use of less than 2 gal/day of graphic arts materials	6.3		Equipment used to apply architectural coatings	6.8.1	
Equipment at retail establishments used to prepare food for human consumption	6.4.1		Unheated, non-conveyorized cleaning equipment with < 10 ft <sup>2</sup> open area; using solvents with initial boiling point ≥ 248 F; and < 25 gal/yr. evaporative losses	6.9	
Ovens at bakeries with total daily production less than 1,000 pounds and exempt by sec. 6.1.1	6.4.3		Brazing, soldering, or welding equipment	6.10	
Equipment used exclusively for extruding or compression molding of rubber or plastics, where no plastisizer or blowing agent is used	6.5		Equipment used to compress natural gas	6.11	
Containers used to store clean produced water	6.6.1		Fugitive emissions sources assoc. with exempt equipment	6.12	√
Containers ≤ 100 bbl used to store oil with specific gravity ≥ 0.8762	6.6.2		Pits and Ponds as defined in Rule 1020	6.15	
Containers ≤ 100 bbl installed prior to 6/1/89 used to store oil with specific gravity ≥ 0.8762	6.6.3		On-site roadmix manufacturing and the application of roadmix as a road base material	6.17	
Containers with a capacity ≤ 250 gallons used to store organic material where the actual storage temperature < 150 F	6.6.4	√	Emissions less than 2 lb/day from units not included above	6.19	√
Containers used to store unheated organic material with an initial boiling point ≥ 302 F	6.6.5	√	Venting PUC quality natural gas from for sole purpose of pipeline and compressor repair and or maintenance	7.2	
Containers used to store fuel oils or non-air-blown asphalt with specific gravity ≥ 0.9042	6.6.6		Non-structural repairs & maintenance to permitted equipment	7.3	√
Containers used to store petroleum distillates used as motor fuel with specific gravity ≥ 0.8251	6.6.7		Detonation of explosives ≤ 100 lb/day and 1,000 lb/year	7.4	

No insignificant activities (Check this box if no equipment in the above categories exist at your facility.)

**Attachment C**

**SJVUAPCD Permits**



# Permit to Operate

**FACILITY:** N-3715

**EXPIRATION DATE:** 04/30/2011

**LEGAL OWNER OR OPERATOR:**  
**MAILING ADDRESS:**

CUSTOM MARBLE & ONYX  
PO BOX 58170  
MODESTO, CA 95358

**FACILITY LOCATION:**

201 WINMOORE AVE  
MODESTO, CA 95358

**FACILITY DESCRIPTION:**

POLYESTER RESIN CASTING OPERATION

The Facility's Permit to Operate may include Facility-wide Requirements as well as requirements that apply to specific permit units.

This Permit to Operate remains valid through the permit expiration date listed above, subject to payment of annual permit fees and compliance with permit conditions and all applicable local, state, and federal regulations. This permit is valid only at the location specified above, and becomes void upon any transfer of ownership or location. Any modification of the equipment or operation, as defined in District Rule 2201, will require prior District approval. This permit shall be posted as prescribed in District Rule 2010.

**Sayed Sadredin**  
Executive Director / APCO

**David Warner**  
Director of Permit Services

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-3715-1-4

**EXPIRATION DATE:** 04/30/2011

**EQUIPMENT DESCRIPTION:**

POLYESTER RESIN OPERATION FOR SYNTHETIC MARBLE AND ONYX MANUFACTURING: GEL COATING OPERATION SERVED BY A SPRAY BOOTH AND AN EXEMPT 0.095 MMBTU/HR NATURAL GAS-FIRED DRYING OVEN

## PERMIT UNIT REQUIREMENTS

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1. The owner or operator shall comply with all the applicable requirements of 40 CFR 63 Subpart WWW. [40 CFR 63 § 63.5800, Table 2]
2. VOC emissions from the entire facility shall not exceed 25,873 pounds during any calendar year. [District Rule 2201]
3. VOC emissions from the entire facility shall not exceed 19,999 pounds during any one quarter. [District Rule 2201]
4. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
6. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
7. All gel coating shall be conducted in the booth with filters in place and the fan(s) operating. [District Rule 2201]
8. Only HVLP, electrostatic, airless, or air assisted airless application equipment shall be used, and shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4684]
9. The owner or operator shall not use organic solvents for cleaning operations that exceed any of the following VOC limits: For product cleaning during manufacturing process or surface preparation for coating application: 25 g/L; For repair and maintenance cleaning: 25 g/L; for cleaning of polyester resin application equipment: 25 g/L. [District Rule 4684]
10. The owner or operator shall not use cleaning solvents that contain hazardous air pollutant (HAP), except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from the application equipment provided that the application equipment directly contacts the resin. [40 CFR 63 § 63.5805 (b), Table 4]
11. The owner or operator shall store HAP containing materials in closed or covered containers except during addition or removal of materials. Bulk HAP containing materials storage tanks may be vented as necessary for safety. [40 CFR 63 § 63.5805 (b) Table 4]
12. An owner or operator shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as paper, cloth, 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]
13. VOC content of clear gel coats used shall not exceed 47% monomer (Styrene) by weight. [District Rule 2201]
14. VOC emissions shall not exceed 120.0 pounds during any one day. [District Rule 2201]
15. PM10 emissions shall not exceed 21.0 pounds during any one day. [District Rule 2201]

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

16. The owner or operator shall keep a record of the following: 1) Daily records of the type and quantity of all resins, catalysts, and cleaning materials used in each operation, 2) Records of the VOC content, in weight percent, of all polyester resin materials used or stored at the facility, and 3) Records of the VOC content of all cleaning materials used and stored at the stationary source. [District Rule 4684]
17. The permittee shall maintain the daily records of VOC emissions from this permit unit in pounds per day. [District Rule 2201]
18. The permittee shall maintain cumulative monthly, quarterly, and yearly records of VOC emitted from the entire facility in pounds. [District Rule 2201]
19. VOC emissions from the gelcoating operation shall be calculated as follows: VOC Emissions = VOC Gelcoats + VOC Cleaning Solvents + VOC Mold Release Agent. [District Rule 2201]
20.  $\text{VOC Gelcoat} = \text{Gelcoat Usage (lb/day)} \times 1 \text{ ton}/2000 \text{ lb} \times \text{appropriate emissions factor from the American Composites Manufacturing Association Emissions Factors for Open Molding of Composites table (9/25/03) (lb/ton)}$ . [District Rule 2201]
21.  $\text{VOC Cleaning Solvents} = \text{Cleaning Solvent Usage (lb/day)} \times \text{Cleaning Solvent VOC content from the MSDS sheet or Product Data Sheet (lb-VOC/lb-Cleaning Solvent)}$ . [District Rule 2201]
22.  $\text{VOC Mold Release Agent} = \text{Mold Release agent Usage (lb/day)} \times \text{Mold Release Agent VOC content available from the manufacturer (lb-VOC/lb-Mold Release Agent)}$ . [District Rule 2201]
23. All records shall be retained on site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-3715-2-4

**EXPIRATION DATE:** 04/30/2011

**EQUIPMENT DESCRIPTION:**

POLYESTER RESIN OPERATION FOR SYNTHETIC MARBLE AND ONYX MANUFACTURING: RESIN MIXING AND POLYMER CASTING OPERATION WITH A GRUBER SYSTEMS MODEL 103501 MIXER

## PERMIT UNIT REQUIREMENTS

---

1. The owner or operator shall comply with all the applicable requirements of 40 CFR 63 Subpart WWW. [40 CFR 63 § 63.5800, Table 2]
2. VOC emissions from the entire facility shall not exceed 25,873 pounds during any calendar year. [District Rule 2201]
3. VOC emissions from the entire facility shall not exceed 19,999 pounds during any one quarter. [District Rule 2201]
4. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
6. The owner or operator shall not use organic solvents for cleaning operations that exceed any of the following VOC limits: For product cleaning during manufacturing process or surface preparation for coating application: 25 g/L; For repair and maintenance cleaning: 25 g/L; for cleaning of polyester resin application equipment: 25 g/L. [District Rule 4684]
7. An owner or operator shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as paper, cloth, 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]
8. The owner or operator shall not use cleaning solvents that contain hazardous air pollutant (HAP), except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from the application equipment provided that the application equipment directly contacts the resin. [40 CFR 63 § 63.5805 (b), Table 4]
9. The owner or operator shall store HAP containing materials in closed or covered containers except during addition or removal of materials. Bulk HAP containing materials storage tanks may be vented as necessary for safety. [40 CFR 63 § 63.5805 (b) Table 4]
10. VOC content of polyester resins used shall not exceed 34% monomer (Styrene) by weight. [District Rule 2201]
11. VOC emissions shall not exceed 60.0 pounds during any one day. [District Rule 2201]
12. PM10 emissions shall not exceed 0.8 pounds during any one day. [District Rule 2201]
13. Calculation of the daily and annual VOC emissions shall be performed as follows: Resin Usage (lb/day, lb/year) x Resin Styrene Content (% by weight) x 0.03. [District Rule 2201]
14. The owner or operator shall keep a record of the following: 1) Daily records of the type and quantity of all resins, catalysts, and cleaning materials used in each operation, 2) Records of the VOC content, in weight percent, of all polyester resin materials used or stored at the facility, and 3) Records of the VOC content of all cleaning materials used and stored at the stationary source. [District Rule 4684]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

15. The permittee shall maintain the daily records of VOC emissions from this permit unit in pounds per day. [District Rule 2201]
16. The permittee shall maintain cumulative monthly, quarterly, and yearly records of VOC emitted from the entire facility in pounds. [District Rule 2201]
17. All records shall be retained on site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-3715-3-0

**EXPIRATION DATE:** 04/30/2011

**EQUIPMENT DESCRIPTION:**

A MILWAUKEE GRINDER AND A GRUBER GRINDING BOOTH SERVED BY A GRUBER MODEL #610596 BAGHOUSE

## PERMIT UNIT REQUIREMENTS

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1. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. All grinding operations shall be performed in the grinding booth. [District Rule 2201]
5. The grinding booth fan shall be turned on prior to grinding. [District Rule 2201]
6. There shall be no visible emissions from the baghouse. [District Rule 2201]
7. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule]
8. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District NSR Rule]
9. PM10 emissions shall not exceed 0.6 pounds in any one day. [District Rule 2201]
10. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070 & 4684]

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# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-3715-4-1

EXPIRATION DATE: 04/30/2011

## EQUIPMENT DESCRIPTION:

POLYESTER RESIN MIXING AND POLYMER CASTING OPERATION FOR SYNTHETIC MARBLE AND ONYX MANUFACTURING CONSISTING OF A GRUBER SYSTEMS INC. AUTOCASTER ECONOMIZER CONTINUOUS CASTING MACHINE

## PERMIT UNIT REQUIREMENTS

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1. The owner or operator shall comply with all the applicable requirements of 40 CFR 63 Subpart WWW. [40 CFR 63 § 63.5800, Table 2]
2. VOC emissions from the entire facility shall not exceed 25,873 pounds during any calendar year. [District Rule 2201]
3. VOC emissions from the entire facility shall not exceed 19,999 pounds during any one quarter. [District Rule 2201]
4. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
6. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule]
7. The owner or operator shall not use organic solvents for cleaning operations that exceed any of the following VOC limits: For product cleaning during manufacturing process or surface preparation for coating application: 25 g/L; For repair and maintenance cleaning: 25 g/L; for cleaning of polyester resin application equipment: 25 g/L. [District Rule 4684]
8. An owner or operator shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as paper, cloth, 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]
9. The owner or operator shall not use cleaning solvents that contain hazardous air pollutant (HAP), except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from the application equipment provided that the application equipment directly contacts the resin. [40 CFR 63 § 63.5805 (b), Table 4]
10. The owner or operator shall store HAP containing materials in closed or covered containers except during addition or removal of materials. Bulk HAP containing materials storage tanks may be vented as necessary for safety. [40 CFR 63 § 63.5805 (b) Table 4]
11. VOC content of polyester resins used shall not exceed 34% monomer (Styrene) by weight. [District Rule 2201]
12. VOC emissions shall not exceed 40.8 pounds during any one day. [District Rule 2201]
13. PM10 emissions shall not exceed 0.9 pound in any one day. [District Rule 2201]
14. Calculation of the daily and annual VOC emissions shall be performed as follows: Resin Usage (lb/day, lb/year) x Resin Styrene Content (% by weight) x 0.015. [District Rule 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
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15. Calculation of the daily PM10 emissions shall be performed as follows: Filler Material Usage (lb/day) x 0.078 lb PM10/ton x 1 ton/2,000 lb. [District Rule 2201]
16. The owner or operator shall keep a record of the following: 1) Daily records of the type and quantity of all resins, catalysts, and cleaning materials used in each operation, 2) Records of the VOC content, in weight percent, of all polyester resin materials used or stored at the facility, and 3) Records of the VOC content of all cleaning materials used and stored at the stationary source. [District Rule 4684]
17. The permittee shall maintain the daily records of VOC and PM10 emissions from this permit unit in pounds per day. [District Rule 2201]
18. The permittee shall maintain cumulative monthly, quarterly, and yearly records of VOC emitted from the entire facility in pounds. [District Rule 2201]
19. All records shall be retained on site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

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