



AUG 22 2012

Oscar Rodriguez
Prison Industry Authority - Avenal
#1 Kings Way
Avenal, CA 93204

**Re: Notice of Minor Title V Permit Modification
District Facility # C-954
Project # C-1120657**

Dear Mr. Rodriguez:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued C-954-1-6, '-2-6, and '-14-1 into the Title V operating permit. Prison Industry Authority - Avenal is proposing to install a chair manufacturing wood working operation served by a baghouse, and establish a Specific Limiting Condition (SLC) for PM10 and VOC emissions for permit units '-1, '-2, and '-14

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued C-954-1-6, '-2-6, and '-14-1, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

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

Sincerely,

David Warner
Director of Permit Services

Enclosures

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

Central Region (Main Office)
1990 E. Gettysburg Avenue
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Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585



AUG 22 2012

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

Re: **Notice of Minor Title V Permit Modification**
District Facility # C-954
Project # C-1120657

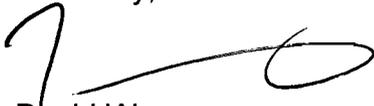
Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. Prison Industry Authority - Avenal is proposing a Title V minor permit modification to incorporate the recently issued C-954-1-6, '-2-6, and '-14-1 into the Title V operating permit. Prison Industry Authority - Avenal is proposing to install a chair manufacturing wood working operation served by a baghouse, and establish a Specific Limiting Condition (SLC) for PM10 and VOC emissions for permit units '-1, '-2, and '-14

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued C-954-1-6, '-2-6, and '-14-1, emission increases, application, and previous Title V permit. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

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

Sincerely,



David Warner
Director of Permit Services

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TITLE V APPLICATION REVIEW

Minor Modification
Project #: C-1120657

Engineer: John Yoshimura
Date: 3/30/12

Facility Number: C-954
Facility Name: Prison Industry Authority - Avenal
Mailing Address: #1 Kings Way
Avenal, CA 93204

Contact Name: Oscar Rodriguez
Phone: (559) 386-0587

Responsible Official: Oscar Rodriguez
Title: Prison Industry Administrator

I. PROPOSAL

Prison Industry Authority – Avenal (PIA – Avenal) is proposing a Title V minor permit modification to incorporate the recently issued Authorities to Construct (ATCs) C-954-1-5, '-2-5 and '-14-0 into the Title V operating permit. Avenal – PIA is proposing to install a chair manufacturing wood working operation served by a DANTHERM filtration unit CS-3-M baghouse, and establish a Specific Limiting Condition (SLC) for PM10 and VOC emissions for permit units '-1, '-2 and '-14.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

II. FACILITY LOCATION

The equipment is located at #1 Kings Way in Avenal, CA.

III. EQUIPMENT DESCRIPTION

C-954-1-5: WOOD PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN, BINKS MODEL PFF-16-10-T-LH SPRAY PAINT BOOTH WITH EXHAUST FILTERS, AND VERID GUNWASHER MODEL 200-1 (COMMON WITH C-954-2)

C-954-2-5: WOOD PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN, BINKS MODEL PFF-16-10-T-LH SPRAY PAINT BOOTH WITH EXHAUST FILTERS AND VERID GUNWASHER MODEL 200-1 (COMMON WITH C-954-1) AND LOCATED IN BLDG #290, FURNITURE FACTORY

C-954-14-0: CHAIR MANUFACTURING AND FINISHING BUILDING #290 WITH A NEW CONVEYORIZED UV COATING LINE CONSISTING OF AN INCLINED UV CURING SYSTEM, A BELT CONVEYOR, A ROTARY SANDING/DENIBBING MACHINE, A RECIPROCATING SPRAY MACHINE, A PANEL BRUSHING MACHINE, A BELT CONVEYOR FOR HAND SANDING, A BELT CONVEYOR FOR HAND WIPING, AND A MULTI-LEVEL FLASH-OFF OVEN SYSTEM (ELECTRIC OVEN) EXHAUSTED THROUGH DANThERM MODEL CS-3-M BAGHOUSE INCLUDING A 40 HP BLOWER AND FILTRATION UNIT

IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

PIA - Avenal is proposing to install a chair manufacturing wood working operation served by DANThERM filtration unit CS-3-M baghouse. This permit unit is also equipped with a conveyORIZED UV coating line consisting of an inclined UV curing system, a belt conveyor, a rotary sanding/denibbing machine, a reciprocating spray machine, a panel brushing machine, a belt conveyor for hand sanding, a belt conveyor for hand wiping, and multi-level flash-off oven system (electric oven).

PIA – Avenal has also proposed to establish a SLC for PM10 and VOC emissions for permit units ‘-1, ‘-2 and ‘-14, to ensure there will be no increase in emissions as a result of this project.

C-954-1-5:

Permit conditions 1 through 12 on the current Permit to Operate C-954-1-3 are represented by permit conditions 3 through 14 on the proposed Permit to Operate C-954-1-5.

Permit condition 13 on the current Permit to Operate C-954-1-3 has been replaced by condition 2 on the proposed Permit to Operate C-954-1-5. Permit unit C-954-14 has been added as part of SLC limits for VOC and PM10 emissions.

Permit conditions 14 through 16 on the current Permit to Operate C-954-1-3 are represented by permit conditions 15 through 17 on the proposed Permit to Operate C-954-1-5

Permit condition 1 on the proposed Permit to Operate C-954-1-5 has been added to ensure there will be no increase in emissions as a result of this project.

C-954-2-5:

Permit conditions 1 through 12 on the current Permit to Operate C-954-2-3 are represented by permit conditions 3 through 14 on the proposed Permit to Operate C-954-2-5.

Permit condition 13 on the current Permit to Operate C-954-2-3 has been replaced by condition 2 on the proposed Permit to Operate C-954-2-5. Permit unit C-954-14 has been added as part of SLC limits for VOC and PM10 emissions.

Permit conditions 14 through 16 on the current Permit to Operate C-954-2-3 are represented by permit conditions 15 through 17 on the proposed Permit to Operate C-954-2-5

Permit condition 1 on the proposed Permit to Operate C-954-2-5 has been added to ensure there will be no increase in emissions as a result of this project

C-954-14-0:

Permit condition 1 has been added to the proposed Permit to Operate C-954-14-0 as part of SLC limits for VOC and PM10 emissions.

Permit condition 2 has been added to the proposed Permit to Operate C-954-14-0 to limit air contaminant discharge.

Permit condition 3 has been added to the proposed Permit to Operate C-954-14-0 to ensure no air contaminants will cause a public nuisance.

Permit condition 4 has been added to the proposed Permit to Operate C-954-14-0 as part of SLC limits for VOC and PM10 emissions.

Permit condition 5 has been added to the proposed Permit to Operate C-954-14-0 to ensure the equipment shall be operated and maintained in good condition to minimize air contaminant emissions.

Permit condition 6 has been added to the proposed Permit to Operate C-954-14-0 to reduce emissions from painting applications.

Permit conditions 7 and 8 have been added to the proposed Permit to Operate C-954-14-0 to limit the PM10 and VOC emissions from the wood working operation.

Permit condition 9 through 17 have been added to the proposed Permit to Operate C-954-14-0 to limit the VOC emissions from the wood coating operation.

Permit condition 18 has been added to the proposed Permit to Operate C-954-14-0 to ensure the facility keeps records of maintaining the dust collector and filters.

Permit condition 19 has been added to the proposed Permit to Operate C-954-14-0 to ensure the facility keeps records of the amount and type of solvents used.

Permit condition 20 has been added to the proposed Permit to Operate C-954-14-0 to ensure the facility keeps records of the MSDS of solvents used, VOC content of solvents, and the type of cleaning activity for each solvent.

Permit conditions 21 has been added to the proposed Permit to Operate C-954-14-0 to ensure the facility maintains and displays the VOC content for each type of coating used.

Permit condition 22 has been added to the proposed Permit to Operate C-954-14-0 to ensure the facility displays the manufacturer's recommendation regarding thinning of any coating used.

Permit condition 22 has been added to the proposed Permit to Operate C-954-14-0 to ensure all records are retained on-site for a minimum of five years and made available for District inspection upon request.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permit No. C-954-1-6, '-2-6, '-14-1
- B. Authorities to Construct No. C-954-1-5, '-2-5, -14-0
- C. Emissions Increases
- D. Previous Title V Operating Permit No.'s C-954-1-3, '-2-3
- E. Application

ATTACHMENT A

Proposed Modified Title V Operating Permit No.
(C-954-1-6, '-2-6, and '-14-1)

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-954-1-6

EXPIRATION DATE: 08/31/2011

EQUIPMENT DESCRIPTION:

WOOD PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN, BINKS MODEL PFF-16-10 T-LH SPRAY PAINT BOOTH WITH EXHAUST FILTERS, AND VERID GUNWASHER MODEL 200-1 (COMMON WITH C-954-2)

PERMIT UNIT REQUIREMENTS

1. Permit units C-954-1 and C-954-2 shall not be operated simultaneously. [District Rule 2201]
2. The combined weekly emissions from equipment operated under permits C-954-1, C-954-2 and C-954-14 shall not exceed 224 lb of VOC and 9.1 lb of PM10. [District Rule 2201]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. 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
5. VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: clear topcoat 275 g/l (2.3 lb/gallon), filler 275 g/l (2.3 lb/gallon), high-solids stains 240 g/l (2.0 lb/gallon), ink 500 g/l (4.2 lb/gallon), mold-seal coating 750 g/l (6.3 lb/gallon), multi-colored coating 275 g/l (2.3 lb/gallon), pigmented coating 275 g/l (2.3 lb/gallon), sanding sealer 275 g/l (2.3 lb/gallon). [District Rule 4606] Federally Enforceable Through Title V Permit
6. VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: low-solids stain 120 g/l (1.0 lb/gallon), stripper 350 g/l (2.9 lb/gallon). [District Rule 4606] Federally Enforceable Through Title V Permit
7. VOC content of strippable booth coating shall not exceed 450 g/l (3.8 lb/gallon) as applied, excluding water and exempt compounds. [District Rule 4606] Federally Enforceable Through Title V Permit
8. Only HVLP, electrostatic, brush, dip, flow, or roll coating application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4606] Federally Enforceable Through Title V Permit
9. Permittee shall demonstrate that HVLP guns manufactured prior to 1/1/96 operate between 0.1 and 10 psig air atomizing pressure, by manufacturer's published technical material or by use of a certified air pressure tip gauge. [District Rule 4606] Federally Enforceable Through Title V Permit
10. All fresh or spent coatings, adhesives, catalysts, thinners and solvents shall be stored in closed containers. Solvent laden cloth or paper shall be stored and disposed in closed non-absorbent containers. [District Rule 4606] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

11. Cleaning activities that use solvents with a VOC content greater than 50 g/l (0.42 lb/gallon) shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4606] Federally Enforceable Through Title V Permit
12. Permittee shall not use materials with a VOC content greater than 50 g/l (0.42 lb/gallon) for spray equipment clean-up unless an enclosed system, or equipment proven to be equally effective at controlling emissions, is used for cleaning. [District Rule 4606]
13. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal), repair and maintenance cleaning (except, until June 30, 2005, cleaning of ultraviolet lamps used for the curing of ultraviolet ink or coatings): 50 g/l (0.42 lb/gal), and cleaning of coating application equipment: 550 g/l (4.6 lb/gal). [District Rule 4606] Federally Enforceable Through Title V Permit
14. The daily emissions from this booth shall not exceed 64.0 lb of VOC and 2.6 lb of PM10. [District NSR Rule] Federally Enforceable Through Title V Permit
15. Permittee shall maintain daily records of the following: quantity and type of coatings and solvents used, mix ratios of volume of components added to each coating, volume of coatings applied, VOC content of each coating as applied, and VOC content of each solvent or stripper. [District Rule 4606] Federally Enforceable Through Title V Permit
16. Permittee shall keep the following records for solvent cleaning activities: manufacturers product data sheet or MSDS of solvents used, VOC content of solvents in g/l or lb/gal, and the type of cleaning activity for which each solvent is used. [District Rule 4606] Federally Enforceable Through Title V Permit
17. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4606] Federally Enforceable Through Title V Permit

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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-954-2-6

EXPIRATION DATE: 08/31/2011

EQUIPMENT DESCRIPTION:

WOOD PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN, BINKS MODEL PFF-16-10-T-LH SPRAY PAINT BOOTH WITH EXHAUST FILTERS AND VERID GUNWASHER MODEL 200-1 (COMMON WITH C-954-1) AND LOCATED IN BLDG #290, FURNITURE FACTORY

PERMIT UNIT REQUIREMENTS

1. Permit units C-953-1 and C-954-2 shall not be operated simultaneously. [District Rule 2201]
2. The combined weekly emissions from equipment operated under permits C-954-1, C-954-2 and C-954-14 shall not exceed 224 lb of VOC and 9.1 lb of PM10. [District Rule 2201]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. 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
5. VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: clear topcoat 275 g/l (2.3 lb/gallon), filler 275 g/l (2.3 lb/gallon), high-solids stains 240 g/l (2.0 lb/gallon), ink 500 g/l (4.2 lb/gallon), mold-seal coating 750 g/l (6.3 lb/gallon), multi-colored coating 275 g/l (2.3 lb/gallon), pigmented coating 275 g/l (2.3 lb/gallon), sanding sealer 275 g/l (2.3 lb/gallon). [District Rule 4606] Federally Enforceable Through Title V Permit
6. VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: low-solids stain 120 g/l (1.0 lb/gallon), stripper 350 g/l (2.9 lb/gallon). [District Rule 4606] Federally Enforceable Through Title V Permit
7. VOC content of strippable booth coating shall not exceed 450 g/l (3.8 lb/gallon) as applied, excluding water and exempt compounds. [District Rule 4606] Federally Enforceable Through Title V Permit
8. Only HVLP, electrostatic, brush, dip, flow, or roll coating application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4606] Federally Enforceable Through Title V Permit
9. Permittee shall demonstrate that HVLP guns manufactured prior to 1/1/96 operate between 0.1 and 10 psig air atomizing pressure, by manufacturer's published technical material or by use of a certified air pressure tip gauge. [District Rule 4606] Federally Enforceable Through Title V Permit
10. All fresh or spent coatings, adhesives, catalysts, thinners and solvents shall be stored in closed containers. Solvent laden cloth or paper shall be stored and disposed in closed non-absorbent containers. [District Rule 4606] Federally Enforceable Through Title V Permit

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

11. Cleaning activities that use solvents with a VOC content greater than 50 g/l (0.42 lb/gallon) shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4606] Federally Enforceable Through Title V Permit
12. Permittee shall not use materials with a VOC content greater than 50 g/l (0.42 lb/gallon) for spray equipment clean-up unless an enclosed system, or equipment proven to be equally effective at controlling emissions, is used for cleaning. [District Rule 4606] Federally Enforceable Through Title V Permit
13. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal), repair and maintenance cleaning (except, until June 30, 2005, cleaning of ultraviolet lamps used for the curing of ultraviolet ink or coatings): 50 g/l (0.42 lb/gal), and cleaning of coating application equipment: 550 g/l (4.6 lb/gal). [District Rule 4606] Federally Enforceable Through Title V Permit
14. The daily emissions from this booth shall not exceed 64.0 lb of VOC and 2.6 lb of PM10. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Permittee shall maintain daily records of the following: quantity and type of coatings and solvents used, mix ratios of volume of components added to each coating, volume of coatings applied, VOC content of each coating as applied, and VOC content of each solvent or stripper. [District Rule 4606] Federally Enforceable Through Title V Permit
16. Permittee shall keep the following records for solvent cleaning activities: manufacturers product data sheet or MSDS of solvents used, VOC content of solvents in g/l or lb/gal, and the type of cleaning activity for which each solvent is used. [District Rule 4606] Federally Enforceable Through Title V Permit
17. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4606] Federally Enforceable Through Title V Permit

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

DRAFT

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-954-14-1

EXPIRATION DATE: 08/31/2011

EQUIPMENT DESCRIPTION:

CHAIR MANUFACTURING AND FINISHING BUILDING #290 WITH A NEW CONVEYORIZED UV COATING LINE CONSISTING OF AN INCLINED UV CURING SYSTEM, A BELT CONVEYOR, A ROTARY SANDING/DENIBBING MACHINE, A RECIPROCATING SPRAY MACHINE, A PANEL BRUSHING MACHINE, A BELT CONVEYOR FOR HAND SANDING, A BELT CONVEYOR FOR HAND WIPING, AND A MULTI-LEVEL FLASH-OFF OVEN SYSTEM (ELECTRIC OVEN) EXHAUSTED THROUGH DANTherm MODEL CS-3-M BAGHOUSE INCLUDING A 40 HP BLOWER AND FILTRATION UNIT

PERMIT UNIT REQUIREMENTS

1. The combined weekly emissions from equipment operated under permits C-954-1, C-954-2 and C-953-14 shall not exceed 224 lb-VOC and 9.1 lb-PM10. [District Rule 2201]
2. {15} 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]
3. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. Visible emissions from the exhaust of the dust collector serving the woodworking operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]
5. 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 Rule 2201]
6. All painting applications shall be conducted inside the booth with filters in place, fan(s) operating, and doors closed. [District Rule 2201]
7. PM10 emissions from the dust collector shall not exceed 0.004 gr/dscf. [District Rules 2201 and 4201]
8. The daily emissions from this operation shall not exceed 0.3 lb-VOC/day and 21.9 lb-PM10/day. [District Rule 2201]
9. VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: clear topcoat 275 g/l (2.3 lb/gallon), filler 275 g/l (2.3 lb/gallon), high-solids stains 240 g/l (2.0 lb/gallon), ink 500 g/l (4.2 lb/gallon), mold-seal coating 750 g/l (6.3 lb/gallon), multi-colored coating 275 g/l (2.3 lb/gallon), pigmented coating 275 g/l (2.3 lb/gallon), sanding sealer 275 g/l (2.3 lb/gallon). [District Rules 2201 and 4606]
10. VOC content of coatings as applied, used for wood product, shall not exceed any of the following limits: low-solids stain 120 g/l (1.0 lb/gallon), stripper 350 g/l (2.9 lb/gallon). [District Rules 2201 and 4606]
11. {1812} VOC content of strippable booth coating shall not exceed 450 g/l (3.8 lb/gallon) as applied, excluding water and exempt compounds. [District Rule 4606]
12. {1813} Only HVLP, electrostatic, brush, dip, flow, or roll coating application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4606]
13. {1814} Permittee shall demonstrate that HVLP guns manufactured prior to 1/1/96 operate between 0.1 and 10 psig air atomizing pressure, by manufacturer's published technical material or by use of a certified air pressure tip gauge. [District Rule 4606]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

14. {1815} All fresh or spent coatings, adhesives, catalysts, thinners and solvents shall be stored in closed containers. Solvent laden cloth or paper shall be stored and disposed in closed non-absorbent containers. [District Rule 4606]
15. {4220} VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal), repair and maintenance cleaning: 25 g/l (0.21 lb/gal), and cleaning of coating application equipment: 25 g/l (0.21 lb/gal). [District Rule 4606]
16. Permittee shall not use cleaning material with a VOC content greater than 25 g/l (0.21 lb/gallon) for all solvent cleaning operations unless such cleaning operations are carried out within an APCO-approved emission control system. [District Rule 4606]
17. {4221} An operator shall store or dispose of fresh or spent solvents, waste solvent cleaning material such as cloth, paper, etc, coating, adhesives, catalysts, and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4606]
18. Records of all maintenance of the dust collector, including all change outs of filter media, shall be maintained. [District Rule 2201]
19. {1827} Permittee shall maintain daily records of the following: quantity and type of coatings and solvents used, mix ratios (by volume) of components added to each coating, volume of coatings applied, VOC content of each coating as applied, and VOC content of each solvent or stripper. [District Rule 4606]
20. {1896} Permittee shall keep the following records for solvent cleaning activities: manufacturers product data sheet or MSDS of solvents used, VOC content of solvents in g/l or lb/gal, and the type of cleaning activity for which each solvent is used. [District Rule 4606]
21. Each container or accompanying data sheet of any coating subject to this rule shall display the maximum VOC content of the coating, as applied after any thinning as recommended by the manufacturer. VOC content shall be displayed as grams of VOC per liter (or pounds of VOC per gallon) of coating, less water and exempt compounds. VOC content displayed may be calculated using product formulation data, or may be determined using the test method in District Rule 4606, Section 6.8. [District Rule 4606]
22. Each container or accompanying data sheet of any coating subject to this rule shall display the manufacturer's recommendation regarding thinning of the coating. This requirement shall not apply to the thinning of coatings with water. [District Rule 4606]
23. {1824} Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4606]

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

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ATTACHMENT B

Authorities to Construct No.
(C-954-1-5, '-2-5, and '-14-0)

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: C-954-1-5

ISSUANCE DATE: 02/01/2012

LEGAL OWNER OR OPERATOR: PRISON INDUSTRY AUTHORITY--AVENAL

MAILING ADDRESS: ACCOUNTING
P O BOX 8
AVENAL, CA 93204

LOCATION: 1 KINGS WAY
AVENAL, CA 93204

EQUIPMENT DESCRIPTION:

MODIFICATION OF WOOD PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN, BINKS MODEL PFF-16-10-T-LH SPRAY PAINT BOOTH WITH EXHAUST FILTERS, AND VERID GUNWASHER MODEL 200-1 (COMMON WITH C-954-2): ESTABLISH A SPECIFIC LIMITING CONDITION (SLC) FOR PM10 AND VOC EMISSIONS (SHARED WITH C-954-2 AND '14)

CONDITIONS

1. Permit units C-954-1 and C-954-2 shall not be operated simultaneously. [District Rule 2201]
2. The combined weekly emissions from equipment operated under permits C-954-1, C-954-2 and C-954-14 shall not exceed 224 lb of VOC and 9.1 lb of PM10. [District Rule 2201]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. 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
5. VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: clear topcoat 275 g/l (2.3 lb/gallon), filler 275 g/l (2.3 lb/gallon), high-solids stains 240 g/l (2.0 lb/gallon), ink 500 g/l (4.2 lb/gallon), mold-seal coating 750 g/l (6.3 lb/gallon), multi-colored coating 275 g/l (2.3 lb/gallon), pigmented coating 275 g/l (2.3 lb/gallon), sanding sealer 275 g/l (2.3 lb/gallon). [District Rule 4606] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT.** This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director APCO

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DAVID WARNER, Director of Permit Services
C-954-1-5 : May 2 2012 8:43AM -- YOSHIMUJ : Joint Inspection NOT Required

6. VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: low-solids stain 120 g/l (1.0 lb/gallon), stripper 350 g/l (2.9 lb/gallon). [District Rule 4606] Federally Enforceable Through Title V Permit
7. VOC content of strippable booth coating shall not exceed 450 g/l (3.8 lb/gallon) as applied, excluding water and exempt compounds. [District Rule 4606] Federally Enforceable Through Title V Permit
8. Only HVLP, electrostatic, brush, dip, flow, or roll coating application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4606] Federally Enforceable Through Title V Permit
9. Permittee shall demonstrate that HVLP guns manufactured prior to 1/1/96 operate between 0.1 and 10 psig air atomizing pressure, by manufacturer's published technical material or by use of a certified air pressure tip gauge. [District Rule 4606] Federally Enforceable Through Title V Permit
10. All fresh or spent coatings, adhesives, catalysts, thinners and solvents shall be stored in closed containers. Solvent laden cloth or paper shall be stored and disposed in closed non-absorbent containers. [District Rule 4606] Federally Enforceable Through Title V Permit
11. Cleaning activities that use solvents with a VOC content greater than 50 g/l (0.42 lb/gallon) shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4606] Federally Enforceable Through Title V Permit
12. Permittee shall not use materials with a VOC content greater than 50 g/l (0.42 lb/gallon) for spray equipment clean-up unless an enclosed system, or equipment proven to be equally effective at controlling emissions, is used for cleaning. [District Rule 4606]
13. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal), repair and maintenance cleaning (except, until June 30, 2005, cleaning of ultraviolet lamps used for the curing of ultraviolet ink or coatings): 50 g/l (0.42 lb/gal), and cleaning of coating application equipment: 550 g/l (4.6 lb/gal). [District Rule 4606] Federally Enforceable Through Title V Permit
14. The daily emissions from this booth shall not exceed 64.0 lb of VOC and 2.6 lb of PM10. [District NSR Rule] Federally Enforceable Through Title V Permit
15. Permittee shall maintain daily records of the following: quantity and type of coatings and solvents used, mix ratios of volume of components added to each coating, volume of coatings applied, VOC content of each coating as applied, and VOC content of each solvent or stripper. [District Rule 4606] Federally Enforceable Through Title V Permit
16. Permittee shall keep the following records for solvent cleaning activities: manufacturers product data sheet or MSDS of solvents used, VOC content of solvents in g/l or lb/gal, and the type of cleaning activity for which each solvent is used. [District Rule 4606] Federally Enforceable Through Title V Permit
17. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4606] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: C-954-2-5

ISSUANCE DATE: 02/01/2012

LEGAL OWNER OR OPERATOR: PRISON INDUSTRY AUTHORITY--AVENAL

MAILING ADDRESS: ACCOUNTING
P O BOX 8
AVENAL, CA 93204

LOCATION: 1 KINGS WAY
AVENAL, CA 93204

EQUIPMENT DESCRIPTION:

MODIFICATION OF WOOD PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN, BINKS MODEL PFF-16-10-T-LH SPRAY PAINT BOOTH WITH EXHAUST FILTERS AND VERID GUNWASHER MODEL 200-1 (COMMON WITH C-954-1) AND LOCATED IN BLDG #290, FURNITURE FACTORY: ESTABLISH A SPECIFIC LIMITING CONDITION (SLC) FOR PM10 AND VOC EMISSIONS (SHARED WITH C-954-1 AND '-14)

CONDITIONS

1. Permit units C-953-1 and C-954-2 shall not be operated simultaneously. [District Rule 2201]
2. The combined weekly emissions from equipment operated under permits C-954-1, C-954-2 and C-954-14 shall not exceed 224 lb of VOC and 9.1 lb of PM10. [District Rule 2201]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. 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
5. VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: clear topcoat 275 g/l (2.3 lb/gallon), filler 275 g/l (2.3 lb/gallon), high-solids stains 240 g/l (2.0 lb/gallon), ink 500 g/l (4.2 lb/gallon), mold-seal coating 750 g/l (6.3 lb/gallon), multi-colored coating 275 g/l (2.3 lb/gallon), pigmented coating 275 g/l (2.3 lb/gallon), sanding sealer 275 g/l (2.3 lb/gallon). [District Rule 4606] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director APCO

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DAVID WARNER, Director of Permit Services

C-954-2-5: May 2 2012 8:43AM - YOSHIMUJ : Joint Inspection NOT Required

6. VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: low-solids stain 120 g/l (1.0 lb/gallon), stripper 350 g/l (2.9 lb/gallon). [District Rule 4606] Federally Enforceable Through Title V Permit
7. VOC content of strippable booth coating shall not exceed 450 g/l (3.8 lb/gallon) as applied, excluding water and exempt compounds. [District Rule 4606] Federally Enforceable Through Title V Permit
8. Only HVLP, electrostatic, brush, dip, flow, or roll coating application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4606] Federally Enforceable Through Title V Permit
9. Permittee shall demonstrate that HVLP guns manufactured prior to 1/1/96 operate between 0.1 and 10 psig air atomizing pressure, by manufacturer's published technical material or by use of a certified air pressure tip gauge. [District Rule 4606] Federally Enforceable Through Title V Permit
10. All fresh or spent coatings, adhesives, catalysts, thinners and solvents shall be stored in closed containers. Solvent laden cloth or paper shall be stored and disposed in closed non-absorbent containers. [District Rule 4606] Federally Enforceable Through Title V Permit
11. Cleaning activities that use solvents with a VOC content greater than 50 g/l (0.42 lb/gallon) shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4606] Federally Enforceable Through Title V Permit
12. Permittee shall not use materials with a VOC content greater than 50 g/l (0.42 lb/gallon) for spray equipment clean-up unless an enclosed system, or equipment proven to be equally effective at controlling emissions, is used for cleaning. [District Rule 4606] Federally Enforceable Through Title V Permit
13. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal), repair and maintenance cleaning (except, until June 30, 2005, cleaning of ultraviolet lamps used for the curing of ultraviolet ink or coatings): 50 g/l (0.42 lb/gal), and cleaning of coating application equipment: 550 g/l (4.6 lb/gal). [District Rule 4606] Federally Enforceable Through Title V Permit
14. The daily emissions from this booth shall not exceed 64.0 lb of VOC and 2.6 lb of PM10. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Permittee shall maintain daily records of the following: quantity and type of coatings and solvents used, mix ratios of volume of components added to each coating, volume of coatings applied, VOC content of each coating as applied, and VOC content of each solvent or stripper. [District Rule 4606] Federally Enforceable Through Title V Permit
16. Permittee shall keep the following records for solvent cleaning activities: manufacturers product data sheet or MSDS of solvents used, VOC content of solvents in g/l or lb/gal, and the type of cleaning activity for which each solvent is used. [District Rule 4606] Federally Enforceable Through Title V Permit
17. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4606] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: C-954-14-0

ISSUANCE DATE: 02/01/2012

LEGAL OWNER OR OPERATOR: PRISON INDUSTRY AUTHORITY--AVENAL

MAILING ADDRESS: ACCOUNTING
P O BOX 8
AVENAL, CA 93204

LOCATION: 1 KINGS WAY
AVENAL, CA 93204

EQUIPMENT DESCRIPTION:

CHAIR MANUFACTURING AND FINISHING BUILDING #290 WITH A NEW CONVEYORIZED UV COATING LINE CONSISTING OF AN INCLINED UV CURING SYSTEM, A BELT CONVEYOR, A ROTARY SANDING/DENIBBING MACHINE, A RECIPROCATING SPRAY MACHINE, A PANEL BRUSHING MACHINE, A BELT CONVEYOR FOR HAND SANDING, A BELT CONVEYOR FOR HAND WIPING, AND A MULTI-LEVEL FLASH-OFF OVEN SYSTEM (ELECTRIC OVEN) EXHAUSTED THROUGH DAN THERM MODEL CS-3-M BAGHOUSE INCLUDING A 40 HP BLOWER AND FILTRATION UNIT (TRANSFERRED FROM C-956-1-2) AND ESTABLISH A SPECIFIC LIMITING CONDITION (SLC) FOR PM10 AND VOC EMISSIONS (SHARED WITH C-954-1 AND '2)

CONDITIONS

1. The combined weekly emissions from equipment operated under permits C-954-1, C-954-2 and C-953-14 shall not exceed 224 lb-VOC and 9.1 lb-PM10. [District Rule 2201]
2. {15} 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]
3. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. Visible emissions from the exhaust of the dust collector serving the woodworking operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]
5. 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 Rule 2201]
6. All painting applications shall be conducted inside the booth with filters in place, fan(s) operating, and doors closed. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director, APCO

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DAVID WARNER, Director of Permit Services

C-954-14-0 : May 2 2012 8:43AM - YOSHIMUJ : Joint Inspection NOT Required

7. PM10 emissions from the dust collector shall not exceed 0.004 gr/dscf. [District Rules 2201 and 4201]
8. The daily emissions from this operation shall not exceed 0.3 lb-VOC/day and 21.9 lb-PM10/day. [District Rule 2201]
9. VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: clear topcoat 275 g/l (2.3 lb/gallon), filler 275 g/l (2.3 lb/gallon), high-solids stains 240 g/l (2.0 lb/gallon), ink 500 g/l (4.2 lb/gallon), mold-seal coating 750 g/l (6.3 lb/gallon), multi-colored coating 275 g/l (2.3 lb/gallon), pigmented coating 275 g/l (2.3 lb/gallon), sanding sealer 275 g/l (2.3 lb/gallon). [District Rules 2201 and 4606]
10. VOC content of coatings as applied, used for wood product, shall not exceed any of the following limits: low-solids stain 120 g/l (1.0 lb/gallon), stripper 350 g/l (2.9 lb/gallon). [District Rules 2201 and 4606]
11. {1812} VOC content of strippable booth coating shall not exceed 450 g/l (3.8 lb/gallon) as applied, excluding water and exempt compounds. [District Rule 4606]
12. {1813} Only HVLP, electrostatic, brush, dip, flow, or roll coating application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4606]
13. {1814} Permittee shall demonstrate that HVLP guns manufactured prior to 1/1/96 operate between 0.1 and 10 psig air atomizing pressure, by manufacturer's published technical material or by use of a certified air pressure tip gauge. [District Rule 4606]
14. {1815} All fresh or spent coatings, adhesives, catalysts, thinners and solvents shall be stored in closed containers. Solvent laden cloth or paper shall be stored and disposed in closed non-absorbent containers. [District Rule 4606]
15. {4220} VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal), repair and maintenance cleaning: 25 g/l (0.21 lb/gal), and cleaning of coating application equipment: 25 g/l (0.21 lb/gal). [District Rule 4606]
16. Permittee shall not use cleaning material with a VOC content greater than 25 g/l (0.21 lb/gallon) for all solvent cleaning operations unless such cleaning operations are carried out within an APCO-approved emission control system. [District Rule 4606]
17. {4221} An operator shall store or dispose of fresh or spent solvents, waste solvent cleaning material such as cloth, paper, etc, coating, adhesives, catalysts, and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4606]
18. Records of all maintenance of the dust collector, including all change outs of filter media, shall be maintained. [District Rule 2201]
19. {1827} Permittee shall maintain daily records of the following: quantity and type of coatings and solvents used, mix ratios (by volume) of components added to each coating, volume of coatings applied, VOC content of each coating as applied, and VOC content of each solvent or stripper. [District Rule 4606]
20. {1896} Permittee shall keep the following records for solvent cleaning activities: manufacturers product data sheet or MSDS of solvents used, VOC content of solvents in g/l or lb/gal, and the type of cleaning activity for which each solvent is used. [District Rule 4606]
21. Each container or accompanying data sheet of any coating subject to this rule shall display the maximum VOC content of the coating, as applied after any thinning as recommended by the manufacturer. VOC content shall be displayed as grams of VOC per liter (or pounds of VOC per gallon) of coating, less water and exempt compounds. VOC content displayed may be calculated using product formulation data, or may be determined using the test method in District Rule 4606, Section 6.8. [District Rule 4606]
22. Each container or accompanying data sheet of any coating subject to this rule shall display the manufacturer's recommendation regarding thinning of the coating. This requirement shall not apply to the thinning of coatings with water. [District Rule 4606]
23. {1824} Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4606]

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ATTACHMENT C

Emissions Increases

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
C-954-1-5	0	0	0	0	0
C-954-2-5	0	0	0	0	0
C-954-14-0	0	0	0	0	0
TOTAL	0	0	0	0	0

ATTACHMENT D

Previous Title V Operating Permit No.'s
C-954-1-3 and '-2-3

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-954-1-3

EXPIRATION DATE: 08/31/2011

EQUIPMENT DESCRIPTION:

WOOD PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN, BINKS MODEL PFF-16-10-T-LH SPRAY PAINT BOOTH WITH EXHAUST FILTERS, AND VERID GUNWASHER MODEL 200-1 (COMMON WITH C-954-2)

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. All 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
3. VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: clear topcoat 275 g/l (2.3 lb/gallon), filler 275 g/l (2.3 lb/gallon), high-solids stains 240 g/l (2.0 lb/gallon), ink 500 g/l (4.2 lb/gallon), mold-seal coating 750 g/l (6.3 lb/gallon), multi-colored coating 275 g/l (2.3 lb/gallon), pigmented coating 275 g/l (2.3 lb/gallon), sanding sealer 275 g/l (2.3 lb/gallon). [District Rule 4606] Federally Enforceable Through Title V Permit
4. VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: low-solids stain 120 g/l (1.0 lb/gallon), stripper 350 g/l (2.9 lb/gallon). [District Rule 4606] Federally Enforceable Through Title V Permit
5. VOC content of strippable booth coating shall not exceed 450 g/l (3.8 lb/gallon) as applied, excluding water and exempt compounds. [District Rule 4606] Federally Enforceable Through Title V Permit
6. Only HVLP, electrostatic, brush, dip, flow, or roll coating application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4606] Federally Enforceable Through Title V Permit
7. Permittee shall demonstrate that HVLP guns manufactured prior to 1/1/96 operate between 0.1 and 10 psig air atomizing pressure, by manufacturer's published technical material or by use of a certified air pressure tip gauge. [District Rule 4606] Federally Enforceable Through Title V Permit
8. All fresh or spent coatings, adhesives, catalysts, thinners and solvents shall be stored in closed containers. Solvent laden cloth or paper shall be stored and disposed in closed non-absorbent containers. [District Rule 4606] Federally Enforceable Through Title V Permit
9. Cleaning activities that use solvents with a VOC content greater than 50 g/l (0.42 lb/gallon) shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4606] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

10. Permittee shall not use materials with a VOC content greater than 50 g/l (0.42 lb/gallon) for spray equipment clean-up unless an enclosed system, or equipment proven to be equally effective at controlling emissions, is used for cleaning. [District Rule 4606]
11. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal), repair and maintenance cleaning (except, until June 30, 2005, cleaning of ultraviolet lamps used for the curing of ultraviolet ink or coatings): 50 g/l (0.42 lb/gal), and cleaning of coating application equipment: 550 g/l (4.6 lb/gal). [District Rule 4606] Federally Enforceable Through Title V Permit
12. The daily emissions from this booth shall not exceed 64.0 lb of VOC and 2.6 lb of PM10. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The combined weekly emissions from equipment operated under permits C-954-1 and C-954-2 shall not exceed 224 lb of VOC and 9.1 lb of PM10. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Permittee shall maintain daily records of the following: quantity and type of coatings and solvents used, mix ratios of volume of components added to each coating, volume of coatings applied, VOC content of each coating as applied, and VOC content of each solvent or stripper. [District Rule 4606] Federally Enforceable Through Title V Permit
15. Permittee shall keep the following records for solvent cleaning activities: manufacturers product data sheet or MSDS of solvents used, VOC content of solvents in g/l or lb/gal, and the type of cleaning activity for which each solvent is used. [District Rule 4606] Federally Enforceable Through Title V Permit
16. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4606] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-954-2-3

EXPIRATION DATE: 08/31/2011

EQUIPMENT DESCRIPTION:

WOOD PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN, BINKS MODEL PFF-16-10-T-LH SPRAY PAINT BOOTH WITH EXHAUST FILTERS AND VERID GUNWASHER MODEL 200-1 (COMMON WITH C-954-1) AND LOCATED IN BLDG #290, FURNITURE FACTORY

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. All 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
3. VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: clear topcoat 275 g/l (2.3 lb/gallon), filler 275 g/l (2.3 lb/gallon), high-solids stains 240 g/l (2.0 lb/gallon), ink 500 g/l (4.2 lb/gallon), mold-seal coating 750 g/l (6.3 lb/gallon), multi-colored coating 275 g/l (2.3 lb/gallon), pigmented coating 275 g/l (2.3 lb/gallon), sanding sealer 275 g/l (2.3 lb/gallon). [District Rule 4606] Federally Enforceable Through Title V Permit
4. VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: low-solids stain 120 g/l (1.0 lb/gallon), stripper 350 g/l (2.9 lb/gallon). [District Rule 4606] Federally Enforceable Through Title V Permit
5. VOC content of strippable booth coating shall not exceed 450 g/l (3.8 lb/gallon) as applied, excluding water and exempt compounds. [District Rule 4606] Federally Enforceable Through Title V Permit
6. Only HVLP, electrostatic, brush, dip, flow, or roll coating application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4606] Federally Enforceable Through Title V Permit
7. Permittee shall demonstrate that HVLP guns manufactured prior to 1/1/96 operate between 0.1 and 10 psig air atomizing pressure, by manufacturer's published technical material or by use of a certified air pressure tip gauge. [District Rule 4606] Federally Enforceable Through Title V Permit
8. All fresh or spent coatings, adhesives, catalysts, thinners and solvents shall be stored in closed containers. Solvent laden cloth or paper shall be stored and disposed in closed non-absorbent containers. [District Rule 4606] Federally Enforceable Through Title V Permit
9. Cleaning activities that use solvents with a VOC content greater than 50 g/l (0.42 lb/gallon) shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4606] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

10. Permittee shall not use materials with a VOC content greater than 50 g/l (0.42 lb/gallon) for spray equipment clean-up unless an enclosed system, or equipment proven to be equally effective at controlling emissions, is used for cleaning. [District Rule 4606] Federally Enforceable Through Title V Permit
11. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal), repair and maintenance cleaning (except, until June 30, 2005, cleaning of ultraviolet lamps used for the curing of ultraviolet ink or coatings): 50 g/l (0.42 lb/gal), and cleaning of coating application equipment: 550 g/l (4.6 lb/gal). [District Rule 4606] Federally Enforceable Through Title V Permit
12. The daily emissions from this booth shall not exceed 64.0 lb of VOC and 2.6 lb of PM10. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The combined weekly emissions from equipment operated under permits C-954-1 and C-954-2 shall not exceed 224 lb of VOC and 9.1 lb of PM10. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Permittee shall maintain daily records of the following: quantity and type of coatings and solvents used, mix ratios of volume of components added to each coating, volume of coatings applied, VOC content of each coating as applied, and VOC content of each solvent or stripper. [District Rule 4606] Federally Enforceable Through Title V Permit
15. Permittee shall keep the following records for solvent cleaning activities: manufacturers product data sheet or MSDS of solvents used, VOC content of solvents in g/l or lb/gal, and the type of cleaning activity for which each solvent is used. [District Rule 4606] Federally Enforceable Through Title V Permit
16. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4606] Federally Enforceable Through Title V Permit

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

ATTACHMENT E

Application

San Joaquin Valley Air Pollution Control District

www.valleyair.org

Permit Application For:

ADMINISTRATIVE AMENDMENT MINOR MODIFICATION SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: CALPIA-Avenal State Prison- Prison Industry Authority	
2. MAILING ADDRESS: STREET/P.O. BOX: <u># 1 Kings Way</u> CITY: <u>Avenal</u> STATE: <u>California</u> 9-DIGIT ZIP CODE: <u>93204</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>#1 Kings Way</u> CITY: <u>Avenal</u> _____ ¼ SECTION _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE: February 21, 2012
4. GENERAL NATURE OF BUSINESS: Prison Industry, Wood Furniture Factory	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) CEFLA, is a ultra violet staining machine, using water base stain and a water base top coat sealer. This is a new installation. Permit number C954-1-5	
6. TYPE OR PRINT NAME OF APPLICANT: Oscar Rodriguez	TITLE OF APPLICANT: PIA, Administrator
7. SIGNATURE OF APPLICANT: 	DATE: 3/19/2012 PHONE: (559) 386-7401 FAX: (559) 386-6063 EMAIL: Oscar.Rodriguez@calpia.ca.gov

For APCD Use Only:

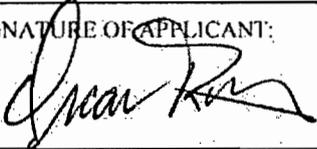
DATE STAMP	FILING FEE RECEIVED: \$ _____ CHECK#: _____
	DATE PAID: _____
	PROJECT NO: _____ FACILITY ID: _____

San Joaquin Valley Air Pollution Control District

www.valleyair.org

Permit Application For:

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2. MAILING ADDRESS: STREET/P.O. BOX: <u># 1 Kings Way</u> CITY: <u>Avenal</u> STATE: <u>California</u> 9-DIGIT ZIP CODE: <u>93204</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>#1 Kings Way</u> CITY: <u>Avenal</u> SECTION: _____ TOWNSHIP: _____ RANGE: _____	INSTALLATION DATE: February 21, 2012
4. GENERAL NATURE OF BUSINESS: <u>Prison Industry, Wood Furniture Factory</u>	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) CEFLA, is a ultra violet staining machine, using water base stain and a water base top coat sealer. This is a new installation. Permit number C954-2-5	
6. TYPE OR PRINT NAME OF APPLICANT: Oscar Rodriguez	TITLE OF APPLICANT: PIA, Administrator
7. SIGNATURE OF APPLICANT: 	DATE: <u>3/19/2012</u> PHONE: (559) 386-7401 FAX: (559) 386-6063 EMAIL: Oscar.Rodriguez@calpia.ca.gov

For APCD Use Only:

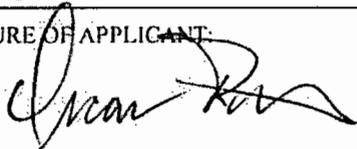
DATE STAMP	FILING FEE RECEIVED: \$ _____ CHECK#: _____
	DATE PAID: _____
	PROJECT NO: _____ FACILITY ID: _____

San Joaquin Valley Air Pollution Control District

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3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>#1 Kings Way</u> CITY: <u>Avenal</u> 1/4 SECTION _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE: February 21, 2012
4. GENERAL NATURE OF BUSINESS: Prison Industry, Wood Furniture Factory	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) CEFLA, is a ultra violet staining machine, using water base stain and a water base top coat sealer. This is a new installation. Permit number C954-14 -b	
6. TYPE OR PRINT NAME OF APPLICANT: Oscar Rodriguez	TITLE OF APPLICANT: PIA, Administrator
7. SIGNATURE OF APPLICANT: 	DATE: 3/19/2012 PHONE: (559) 386-7401 FAX: (559) 386-6063 EMAIL: Oscar.Rodriguez@calpia.ca.gov

For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: \$ _____ CHECK#: _____
	DATE PAID: _____
	PROJECT NO: _____ FACILITY ID: _____

**San Joaquin Valley
Unified Air Pollution Control District**

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

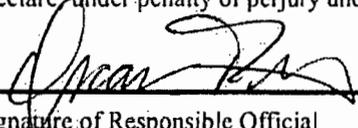
- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: CALPIA-Prison Industry Authority	FACILITY ID: C - 954-1-5
1. Type of Organization: <input type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input checked="" type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: CALPIA-Prison Industry Authority	
3. Agent to the Owner: Oscar Rodriguez	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:



Signature of Responsible Official

March 19, 2012

Date

Oscar Rodriguez

Name of Responsible Official (please print)

Prison Industry Administrator

Title of Responsible Official (please print)

**San Joaquin Valley
Unified Air Pollution Control District**

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

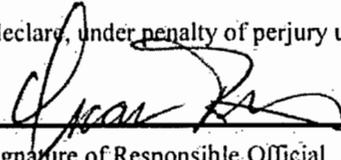
- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: CALPIA-Prison Industry Authority	FACILITY ID: C -954-2-S
1. Type of Organization: <input type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input checked="" type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: CALPIA-Prison Industry Authority	
3. Agent to the Owner: Oscar Rodriguez	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

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March 19, 2012

Date

Oscar Rodriguez

Name of Responsible Official (please print)

Prison Industry Administrator

Title of Responsible Official (please print)

San Joaquin Valley Unified Air Pollution Control District

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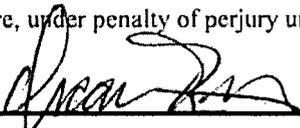
- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: CALPIA-Prison Industry Authority	FACILITY ID: C -954-14 -0
1. Type of Organization: <input type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input checked="" type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: CALPIA-Prison Industry Authority	
3. Agent to the Owner: Oscar Rodriguez	

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Oscar Rodriguez

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 Prison Industry Administrator

 Title of Responsible Official (please print)