



SEP 0 3 2010

Clark Bird
Fineline Industries, Inc
2047 Grogan Ave
Merced, CA 95340

**Re: Notice of Preliminary Decision - Title V Permit Renewal
District Facility # N-1246
Project # N-1091457**

Dear Mr. Bird:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Fineline Industries, Inc for its fiberglass boat manufacturing facility, 455 Grogan Ave, Merced, California.

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

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

Sincerely,

David Warner
Director of Permit Services

Attachments

C: Juscelino Siongco, Permit Services Engineer

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34846 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585



SEP 0 3 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 – Title V Permit Renewal
District Facility # N-1246
Project # N-1091457**

Dear Mr. Rios:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Fineline Industries, Inc for its fiberglass boat manufacturing facility, 455 Grogan Ave, Merced, 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
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SEP 03 2010

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

**Re: Notice of Preliminary Decision - Title V Permit Renewal
District Facility # N-1246
Project # N-1091457**

Dear Mr. Tollstrup:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Finline Industries, Inc for its fiberglass boat manufacturing facility, 455 Grogan Ave, Merced, California.

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

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

Sincerely,

David Warner
Director of Permit Services

Attachments

C: Juscelino Siongco, Permit Services Engineer

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Merced Sun Star

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

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District solicits public comment on the proposed renewal of the Federally Mandated Operating Permit to Fineline Industries, Inc for its fiberglass boat manufacturing facility, 455 Grogan Ave, Merced, California.

The District's analysis of the legal and factual basis for this proposed action, project #N-1091457, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and the District office at the address below. There are no emission changes associated with this proposed action. This will be the public's only opportunity to comment on the specific conditions of the proposed renewal of the Federally Mandated Operating permit. If requested by the public, the District will hold a public hearing regarding issuance of this renewed permit. For additional information, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900. Written comments on the proposed renewed permit must be submitted within 30 days of the publication date of this notice to DAVID WARNER, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 1990 E. GETTYSBURG AVE, FRESNO, CALIFORNIA 93726-0244.

**SAN JOAQUIN VALLEY
AIR POLLUTION CONTROL DISTRICT**

**Proposed Title V Permit Renewal Evaluation
Fineline Industries, Inc.
N-1246**

TABLE OF CONTENTS

I.	PROPOSAL	2
II.	FACILITY LOCATION	2
III.	EQUIPMENT LISTING	3
IV.	GENERAL PERMIT TEMPLATE USAGE	3
V.	SCOPE OF EPA AND PUBLIC REVIEW	3
VI.	FEDERALLY ENFORCEABLE REQUIREMENTS	3
VII.	REQUIREMENTS NOT FEDERALLY ENFORCEABLE	5
VIII.	PERMIT REQUIREMENTS	5
IX.	PERMIT SHIELD	18
X.	PERMIT CONDITIONS	19
XI.	ATTACHMENTS	19
A.	DRAFT RENEWED TITLE V OPERATING PERMIT	
B.	PREVIOUS TITLE V OPERATING PERMIT	
C.	DETAILED FACILITY LIST	

TITLE V PERMIT RENEWAL EVALUATION
Fiberglass Boat Manufacturing

Engineer: Juscelino Siongco
Date: August 19, 2010

Facility Number: N-1246
Facility Name: Fineline Industries, Inc
Mailing Address: 2047 Grogan Ave
Merced, CA 95340

Contact Name: Paul Zawila
Phone: (864) 980-0168

Responsible Official: Clark Bird
Title: CEO

Project # : N-1091457
Deemed Complete: April 6, 2009

I. PROPOSAL

Fineline Industries was issued a Title V permit on February 28, 2005. As required by District Rule 2520, the applicant is requesting a permit renewal. The existing Title V permit shall be reviewed and modified to reflect all applicable District and federal rules updated, removed, or added since the issuance of the initial Title V permit.

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

II. FACILITY LOCATION

Fineline Industries, Inc is located at 455 Grogan Ave, Merced.

III. EQUIPMENT LISTING

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

IV. GENERAL PERMIT TEMPLATE USAGE

The applicant does not propose to use any model general permit templates.

V. SCOPE OF EPA AND PUBLIC REVIEW

Certain segments of the proposed Renewed 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.

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

VI. FEDERALLY ENFORCEABLE REQUIREMENTS

A. Rules Updated

- District Rule 2020, Exemptions
(amended September 21, 2006 ⇒ amended December 20, 2007)
- District Rule 2201, New and Modified Stationary Source Review Rule
(amended September 21, 2006 ⇒ amended December 18, 2008)
- District Rule 4101, Visible Emissions
(amended November 15, 2001 ⇒ amended February 17, 2005)
- District Rule 4601, Architectural Coatings
(amended December 17, 1992 ⇒ amended October 31, 2001)
- District Rule 4684, Polyester Resin Operations
(amended September 20, 2007 ⇒ amended September 17, 2009)
- District Rule 8011, General Requirements
(adopted November 15, 2001 ⇒ amended August 19, 2004)

- District Rule 8021, Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities
(adopted November 15, 2001 ⇒ amended August 19, 2004)
- District Rule 8031, Bulk Materials
(adopted November 15, 2001 ⇒ amended August 19, 2004)
- District Rule 8041, Carryout and Trackout
(adopted November 15, 2001 ⇒ amended August 19, 2004)
- District Rule 8051, Open Areas
(adopted November 15, 2001 ⇒ amended August 19, 2004)
- District Rule 8061, Paved and Unpaved Roads
(adopted November 15, 2001 ⇒ amended August 19, 2004)
- District Rule 8071, Unpaved Vehicle/Equipment Traffic Areas
(adopted November 15, 2001 ⇒ amended September 16, 2004)
- 40 CFR Part 82, Subpart B, Stratospheric Ozone (amended November 9, 2007)
- 40 CFR Part 82, Subpart F, Stratospheric Ozone (amended June 8, 2008)

B. Rules Not Updated

- District Rule 1100, Equipment Breakdown (amended December 17, 1992)
- District Rule 1160, Emission Statements (adopted November 18, 1992)
- District Rule 2010, Permits Required (amended December 17, 1992)
- 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 4201, Particulate Matter Concentration (amended December 17, 1992)
- 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos
- 40 CFR Part 63, Subpart VVVV, National Emissions Standards for Hazardous Air Pollutants from Boat Manufacturing
- 40 CFR Part 64, Compliance Assurance Monitoring

VII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

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

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

A. District Rule 4102 - Nuisance

1. N-1246-0-2 Facility-Wide Requirements

- Condition 1 of the proposed permit is based on this rule.

VIII. PERMIT REQUIREMENTS

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

A. District Rule 2020 - Exemptions

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

B. District Rule 2201 - New and Modified Stationary Source Review Rule

District Rule 2201 has been amended since this facility's initial Title V permit was issued. This Title V permit renewal does not constitute a modification per section 3.26, defined as an action including at least one of the following items:

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

Therefore, the updated requirements of this rule are not applicable at this time.

C. District Rule 4101 - Visible Emissions

This rule prohibits the discharge of any air contaminant for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart; or is of such opacity as to obscure an observer's view to a degree equal to or greater than the smoke described in Section 5.1 of Rule 4101. The rule was amended in February 17, 2005.

1. N-1246-0-2 – Facility-Wide Requirements

- Condition 22 on the proposed permit ensures compliance with this rule.

D. District Rule 4601 - Architectural Coatings

This rule limits the emissions of VOCs from architectural coatings. It requires limiting the application of any architectural coating to no more than

what is listed in the Table of Standards (Section 5.0). The rule was amended in December 17, 2009. Since the following changes included in the latest rule amendment did not result in adding new requirements and/or revising current requirements in the facility-wide permit, no further evaluation is needed.

Section 2.0 – Applicability

The phrase “blends or repackages” was added to rule language to extend the applicability of rule language to facilities involved in those activities.

Section 3.0 – Definitions

Numerous definitions was added, deleted or modified in order to make the amended rule harmonize with definitions and rule requirements presented in the California Air Resources Board (ARB) Suggested Control Measures (SCM).

Section 4.0 – Exemptions

A reporting requirement was added for any architectural coating that is sold in a container with a volume of one liter or less. The exemption for architectural coatings was further defined by adding “coatings that are supplied and offered for sale” to current language, in order to make the rule consistent with the ARB SCM.

Section 5.0 – Requirements

The amended rule implements the recommended VOC limits per the ARB SCM. The following changes were as follows: 15 coating categories were eliminated, ten were added, nineteen coatings categories remained unchanged, and the VOC content limits for 19 categories were lowered.

Section 6.0 – Administrative Requirements

Section 6.1 – Labeling Requirements

Labeling requirements were updated to add new labeling standards consistent with new coatings categories per the SCM.

Section 6.2 – Reporting Requirements

A new section was added to include reporting requirements per the SCM. The SCM contains a new requirement to submit sales data. Collection of this data is authorized in the California Health and Safety Code which requires submission of data to estimate emissions.

Section 6.3 – Test Methods

New sections were added to coincide with new coating categories pursuant to the ARB SCM.

Section 7.0 – Compliance Schedule

This section was updated to account for the new amendments to rule language by adding the phrase “the dates specified within the text of the rule.”

Section 8.0 – Averaging Compliance Option

This section was deleted in its entirety.

The following permit requirements were added and/or revised to ensure compliance with this rule:

1. N-1246-0-3 – Facility-Wide Requirements

- Conditions 23, 24, and 25 ensure compliance with the revised requirements of this rule.

E. District Rule 4684 - Polyester Resin Operations

The purpose of the rule is to limit VOC emissions from polyester resin operations and from organic solvent cleaning, storage and disposal of solvents and waste solvent materials associated with such operations. The rule applies to commercial and industrial polyester resin operations. Polyester resin operations is defined in the rule as methods used for the production or rework of products by mixing, pouring, hand layup, impregnating, injecting, forming, winding, spraying, and/or curing with fiberglass, filers, or other reinforcement materials and associated cleanup. This rule had been amended in September 2007 and September 2009.

The September 2007 rule amendments implement the Best Available Retrofit Control Technology (BARCT) standards for organic solvent cleaning operations. It exempts facilities that use less than 20 gallons per month of polyester resin, provided the operator keeps the records required by the rule to demonstrate exemption status. Also exempt from the organic cleaning requirements of the rule are cleaning of solar cells, laser hardware, scientific instruments, or high precision optics. Cleaning in laboratory tests and analyses, or bench scale or research and development projects is also exempt from the organic cleaning requirements of the rule.

The rule allows an operator to choose one of three compliance methods. One option is to use low-VOC polyester resins ranging from 35% to 50% by weight monomer content depending on the type of resin or gel coat. The second option is to use resins containing vapor suppressant wherein the weight loss from VOC emissions does not exceed 60 grams per square meter of exposed

surface during resin polymerization. The third option is to operate an APCO-approved VOC emission control system that achieves an overall capture and control efficiency of at least 85 percent by weight.

It requires that spray application of resins be performed using airless, air-assisted airless, high-volume low-pressure spray equipment, or electrostatic spray equipment. In lieu of using the specified spray equipment, the operator may comply by operating an APCO-approved VOC emission control system around the application operation, provided the control system achieves an overall capture and control efficiency of at least 85 percent by weight.

The amended rule requires operators to use organic solvent cleaning materials that contain no more than 25 grams/liter (0.21 pound/gallon) for all types of cleaning operations. Also, the rule includes administrative requirements such as recordkeeping and test methods to demonstrate compliance with the emission standards of the rule.

The September 2009 rule amendment reasonably available control technology (RACT) requirements as recommended in the Control Techniques Guidelines (CTG) for Fiberglass Boat Manufacturing Materials (EPA-453/R-08-004) promulgated by EPA in September 2008, as required by the Clean Air Act (CAA). The CTGs contains VOC content limits, VOC control device efficiency, and work practice standards to reduce VOC emissions. The following are the amendments to Rule 4684.

Section 2.0 (Applicability) is expanded to clarify that the rule also applies to fiberglass boat manufacturing operations.

Section 3.0 (Definitions) includes 17 new definitions of terms associated with fiberglass boat manufacturing in order to enhance the clarity and effectiveness of the rule.

Section 4.1 (Exemption) is modified to state that the existing 20 gallon or less per month of polyester resin materials usage exemption does not apply to fiberglass boat manufacturing. The reason for excluding fiberglass boat manufacturing from this low-usage exemption is due to the CTG not having a similar exemption for fiberglass boat manufacturing.

As recommended by the CTG standards, a new Section 4.2 is added to exempt production resins (including skin coats) that must meet the specifications for use in military vessels or must be approved by the U.S. Coast Guard for use in construction of lifeboats, rescue boats, and other life-saving appliances approved under 40 CFR subchapter Q, or to the construction of small passenger vessels regulated by 46 CFR subchapter T

are exempt from the requirements of Section 5.2.2. This exemption does not constitute relaxation of the SIP-approved version of the rule because there are no boat manufacturing sources within the District that is currently manufacturing vessels or pleasure crafts that meet the criteria stated above.

Section 5.0 (Requirements). Section 5.1 is modified to specify that the requirements apply to polyester resin operations, except for fiberglass boat manufacturing which would subject to new Section 5.2. New Section 5.2 includes three compliance options for controlling VOC emissions from fiberglass boat manufacturing. The new monomer VOC limits apply only to fiberglass boat manufacturing facilities whose total VOC emissions from open molding fiberglass boat manufacturing operations, including related solvent cleaning activities, before consideration of controls, at a stationary source are equal to or greater than 2.7 tons of VOC per 12-month rolling period. The operator needs to comply with the applicable recordkeeping requirements of the rule and would have to calculate the VOC emissions to demonstrate that the VOC emissions are at least 2.7 tons per 12-month rolling period. Operators of fiberglass boat manufacturing operations whose VOC emissions are less than specified VOC applicability threshold of 2.7 tons of VOC per 12-month rolling period will still be subject to the current resin and gel coat monomer content limit specified in the previous amended rule.

Compliant Material Option: Achieve the specified individual monomer content limits. The weighted average monomer VOC content limits for fiberglass boat manufacturing open molding process ranges from 28% to 40% by weight depending on the type of resin (i.e., production resin and tooling resin), type of gel coat (pigmented gel coat, clear gel coat, and tooling gel coat), and also depending on the application method. The monomer VOC content limits are shown in the Table 6 of the rule. In addition to complying with the monomer VOC content limit, each resin and each gel coat must not contain more than 5% by weight non-monomer VOC content. The rule would include the calculation equations to determine the weighted average monomer VOC content.

Emissions Averaging Option: Meet the numerical monomer VOC emission rate limits as shown in Table 7 of the rule, which would enable an operator to average emissions among different operations using the equations in the draft rule to estimate the monomer VOC emissions rates from each operation based on material and application method. In addition to complying with a facility-specific monomer VOC mass emission rate (12-month rolling average), each resin and gel coat must not contain more than 5% by weight non-monomer VOC content. A table of the Monomer VOC Emission Rate Formulas for Open Molding Operations is included in the rule.

Add-on Control Option: Install and operate an APCO-approved VOC control system to achieve a numerical monomer VOC emission limit that is determined for each facility based on the mix of application methods and materials used at that facility. Additionally the VOC control system must also meet the existing 85% capture and control efficiency specified in the previous amended rule.

Operators of fiberglass boat manufacturing operations whose VOC emissions are less than 2.7 tons of VOC per 12-month rolling period or fiberglass boat manufacturing operations using a closed molding process will still be subject to the current resin and gel coat monomer content limit specified by the previous amended rule. The VOC limits are: 35% monomer by weight for low VOC resins, except for specialty resins and gel coats; 45% monomer by weight for low VOC pigmented gel coats; and 50% monomer by weight for low VOC specialty resins and clear gel coats. In lieu of using materials that meet the monomer content limits, the previous amended rule allows the operator to (1) use of closed mold system; (2) use resin containing a vapor suppressant, such that the weight loss from the VOC emissions does not exceed 60 grams per square meter of exposed surface during resin polymerization; (3) install and operate an APCO-approved VOC control system that meets a specified capture and control efficiency. In addition to complying with the previous amended rule VOC requirements, the operator needs to comply with the applicable recordkeeping requirements of the rule and calculate the VOC emissions from fiberglass boat manufacturing to demonstrate if the VOC emissions from all fiberglass boat manufacturing open molding operations, including related cleaning activities, are less than 2.7 tons of VOC per 12-month rolling period.

The current requirements for VOC control system in Section 5.1.1.4 are modified to include a calculation equation that needs to be used by the operator in order to demonstrate that the control system reduces the VOC emissions at all times to a level that is not greater than the emissions which would have been achieved through the use of compliant materials, compliant equipment, or compliant work practices.

In the amended rule, work practice standards are included requiring an operator to ensure that all containers with a capacity equal to or greater than 208 liters (55 gallons), including those used for on-site mixing of putties and polyputties have a cover with no visible gaps in place at all times, except when material is being placed or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container.

1. N-1246-1-2 – Gel Coat Operation

- Conditions 2 and 3 from the current PTO were included as conditions 2 and 3 on the proposed permit.
- Condition 4 from the current PTO was revised to change the VOC content of solvents from 50 g/l (0.42 lb/gal) to 25 g/l (0.21 lb/gal) and included as condition 4 on the proposed permit.
- Conditions 5, 6, and 25 from the current PTO were included as conditions 5, 6, and 25 on the proposed permit.

2. N-1246-2-2 – Gel Coat Operation

- Conditions 2 and 3 from the current PTO were included as conditions 2 and 3 on the proposed permit.
- Condition 4 from the current PTO was revised to change the VOC content of solvents from 50 g/l (0.42 lb/gal) to 25 g/l (0.21 lb/gal) and included as condition 4 on the proposed permit.
- Conditions 5, 6, and 25 from the current PTO were included as conditions 5, 6, and 25 on the proposed permit.

F. District Rule 8011 - General Requirements

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

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

Conditions 29 through 34 of permit unit N-1246-0-2 ensure compliance.

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

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

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

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

Condition 29 of permit unit N-1246-0-2 ensures compliance.

H. District Rule 8031 - Bulk Materials

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

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

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

Condition 30 of permit unit N-1246-0-2 ensures compliance.

I. District Rule 8041 - Carryout and Trackout

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

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

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

Condition 31 of permit unit N-1246-0-2 ensures compliance.

J. District Rule 8051 - Open Areas

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

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

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

Condition 32 of permit unit N-1246-0-2 ensures compliance.

K. District Rule 8061 - Paved and Unpaved Roads

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

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

Condition 33 of permit unit N-1246-0-2 ensures compliance.

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

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

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

Condition 34 of permit unit N-1246-0-2 ensures compliance.

M. 40 CFR 63, Subpart VVVV - National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing

The purpose of this rule is to set limits on the HAP content of resins, gel coats, clean-up solvents, and adhesives used in the manufacture of fiberglass boats. The rule also establishes work practice standards. Permit units N-1246-1 and -2 are both subject to this subpart. Both permit units will be addressed together for each applicable section.

Section 63.5698 lists materials that are exempt from the HAP content limits and are excluded from the open molding emission limit.

1. N-1246-1-2 and -2-2 – Gel Coat Operations

- Condition 23 on the proposed permits assures compliance with this rule.

Sections 63.5698 and 63.5710 establish the requirements needed to show compliance with the organic HAP emission limit when utilizing the emissions averaging method.

1. N-1246-1-2 and -2-2 – Gel Coat Operations

- Conditions 7 through 12 on the proposed permits assure compliance with this rule.

Section 63.5731 establishes the work practice standards concerning resin and gel coat mixing operations when using 55 gallon or greater containers.

1. N-1246-1-2 and -2-2 – Gel Coat Operations

- Conditions 15 and 16 on the proposed permits assure compliance with this rule.

Section 63.5734 requires that cleaning solvents contain no more than 5% organic HAP by weight.

1. N-1246-1-2 and -2-2 – Gel Coat Operations

- Conditions 13 and 14 on the proposed permits assure compliance with this rule.

Section 63.5737 establishes the work practice standards concerning the storage of solvents that are used for the cleaning of application equipment.

1. N-1246-1-2 and -2-2 – Gel Coat Operations

- Conditions 16 and 18 on the proposed permits assure compliance with this rule.

Section 63.5740 establishes the content limit for carpet and fabric adhesives and also requires that records of the organic HAP content be maintained.

1. N-1246-1-2 and -2-2 – Gel Coat Operations

- Conditions 17 and 18 on the proposed permits assure compliance with this rule.

Section 63.5758 establishes the methods that shall be used for determining the HAP content of affected materials.

1. N-1246-1-2 and -2-2 – Gel Coat Operations

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

Section 63.5761 describes the notification requirements for facilities subject to this subpart.

1. N-1246-1-2 and -2-2 – Gel Coat Operations

- Condition 20 on the proposed permits assures compliance with this rule.

Section 63.5764 describes schedule for submitting annual compliance reports and procedures to follow when any deviations from work practice standards or emission limits occur.

1. N-1246-1-2 and -2-2 – Gel Coat Operations

- Conditions 21 and 22 on the proposed permits assure compliance with this rule.

Section 63.5767 identifies the records, in addition to those specified in individual sections of this subpart, which must be kept and maintained.

1. N-1246-1-2 and -2-2 – Gel Coat Operations

- Condition 24 on the proposed permits assures compliance with this rule.

N. 40 CFR Part 64 - Compliance Assurance Monitoring (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.

1. N-1246-1-2 and -2-2 – Gel Coat Operations

These emissions units are not subject to cam since they do not have emission limits on the permit.

2. N-1246-3-2 and -4-2 – Grinding Operation and Woodworking Operation

These emissions units are not subject to CAM since they do not have emission limits on the permit.

3. N-1246-5-3 – Woodworking Operation

This emissions unit may be subject to CAM for PM₁₀, as there is a PM₁₀ limit, and it does have add-on control in the form of a baghouse. In order to require CAM, the pre-control potential to emit for the unit must exceed the major source threshold for PM₁₀ emissions.

Maximum Quantity of Sawdust Collected: 400 lb/day
Baghouse Control Efficiency: 99%
PM₁₀ Fraction: 0.4 lb-PM₁₀/lb-PM

Daily PM₁₀ entering the baghouse = 0.4 lb-PM₁₀/lb-PM x 400 lb + 0.99
= 161.6 lb-PM₁₀/day

Annual PM₁₀ Emissions = 161.6 lb-PM₁₀/day x 365 days
= 58,984 lb/year

The PM₁₀ emissions are less than the major source threshold of 140,000 lb/year. Therefore, this emissions unit is not subject to CAM.

O. 40 CFR Part 82, Subpart B and F - Stratospheric Ozone

These regulations apply to servicing motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC). Sections of this regulation were amended in 2004 and 2008, and conditions 27 and 28 of N-1246-0-2 assure compliance with the requirements.

IX. PERMIT SHIELD

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

A. Requirements Addressed by Model General Permit Templates

The applicant does not propose to use any model general permit templates.

B. Obsolete Permit Shields From Existing Permit Requirements

There are no obsolete permit shields removed from the existing permit requirements.

X. PERMIT CONDITIONS

See Attachment A – Draft Renewed Title V Operating Permit.

XI. ATTACHMENTS

- A. Draft Renewed Title V Operating Permit
- B. Previous Title V Operating Permit
- C. Detailed Facility List

ATTACHMENT A

Draft Renewed Title V Operating Permit

San Joaquin Valley Air Pollution Control District

FACILITY: N-1246-0-2

EXPIRATION DATE: 09/30/2009

FACILITY-WIDE REQUIREMENTS

1. {118} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. {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
3. {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
4. {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
5. {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
6. {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
7. {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
8. {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
9. {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: FINELINE INDUSTRIES, INC.
Location: 455 GROGAN AVENUE, MERCED, CA
N-1246-0-2: Aug 19 2010 1:11PM - 510NGCQJ

10. {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
11. {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
12. {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
13. {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
14. {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
15. {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
16. {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
17. {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
18. {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
19. {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
20. {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
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. {4401} 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. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin January 1 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

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

DRAFT

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1246-1-3

EXPIRATION DATE: 09/30/2009

EQUIPMENT DESCRIPTION:

GEL COAT OPERATION SERVED BY SPRAY BOOTH #1 (BLEEKER BROS. STANDARD F-20-7, 3HP)

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. The monomer content of polyester materials used at this facility shall be equal to or less than the following: for polyester resins, 35% by weight; for pigmented gel coats, 45% by weight; for specialty resins and clear gel coats, 50% by weight. [District Rule 4684, 5.1.1.1] Federally Enforceable Through Title V Permit
3. Spray application of polyester resin shall only be performed using airless, air assisted airless, or high-volume low-pressure (HVLP) spray equipment. [District Rule 4684, 5.1.2] Federally Enforceable Through Title V Permit
4. 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 polyester resin application equipment: 25 g/l (0.21 lb/gal). [District Rule 4684, 5.3.1] Federally Enforceable Through Title V Permit
5. Permittee shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in self-closing, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4684, 5.4] Federally Enforceable Through Title V Permit
6. Permittee shall maintain the following records: daily records of the type and quantity of all coatings, resins, catalysts, and cleaning materials used in each operation; records of the VOC content, in weight percent, of all polyester resin materials used or stored at the facility; records of the VOC content of all cleaning materials used and stored at the facility. [District Rule 4684, 6.1] Federally Enforceable Through Title V Permit
7. Compliance using the emissions averaging requirements of 40 CFR Part 63, Subpart VVVV shall be demonstrated on a 12-month rolling-average basis and shall be determined at the end of every month (12 times per year). The first 12-month period begins on August 23, 2004. [40 CFR 63.5710(a)] Federally Enforceable Through Title V Permit
8. On August 23, 2005 and at the end of every subsequent month, permittee shall use Equation 1 of 40 CFR 63.5710(b) to demonstrate that the organic HAP emissions from this facility do not exceed the organic HAP emission limit determined by Equation 1 of 40 CFR 63.5698(b), for the same 12-month period. [40 CFR 63.5710(b)] Federally Enforceable Through Title V Permit
9. The organic HAP emissions from this facility shall not exceed the limit established by Equation 1 of 40 CFR 63.5698(b): $HAP\ Limit = [(46 \times Mr) + (159 \times Mpg) + (291 \times Mcg) + (54 \times Mtr) + (214 \times Mtg)]$, where Mr = mass of production resins used in the past 12 months; Mpg = mass of pigmented gel coats used in the past 12 months; Mcg = mass of clear gel coats used in the past 12 months; Mtr = mass of tooling resins used in the past 12 months; and Mtg = mass of tooling gel coats used in the past 12 months. All units are in megagrams. [40 CFR 63.5698(b)] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

10. On August 23, 2005 and at the end of every subsequent month, permittee shall calculate actual HAP emissions from the preceding 12 months using Equation 1 of 40 CFR 63.5710(b): Actual HAP Emissions = $(PV_r \times Mr) + (PV_{pg} \times M_{pg}) + (PV_{cg} \times M_{cg}) + (PV_{tr} \times M_{tr}) + (PV_{tg} \times M_{tg})$, where PV_r = weighted-average MACT model point value for production resin used in the past 12 months; Mr = mass of production resin used in the past 12 months; PV_{pg} = weighted-average MACT model point value for pigmented gel coat used in the past 12 months; M_{pg} = mass of pigmented gel coats used in the past 12 months; PV_{cg} = weighted-average MACT model point value for clear gel coat used in the past 12 months; M_{cg} = mass of clear gel coats used in the past 12 months; PV_{tr} = weighted-average MACT model point value for tooling resin used in the past 12 months; M_{tr} = mass of tooling resins used in the past 12 months; PV_{tg} = weighted-average MACT model point value for tooling gel coat used in the past 12 months; and M_{tg} = mass of tooling gel coats used in the past 12 months. All mass units are in megagrams and all weighted-average MACT model point values are in kilograms per megagram. [40 CFR 63.5710(b)] Federally Enforceable Through Title V Permit
11. The weighted-average MACT point values for each resin or gel coat used by this facility shall be determined using Equation 2 of 40 CFR 63.5710(c): Weighted-Average MACT Point Value ($PV_r, PV_{pg}, PV_{cg}, PV_{tr}$ and PV_{tg}) = $[\text{summation of } (M_i \times PVi)] / [\text{summation of } M_i]$, where M_i = mass of each resin or gel coat used within the past 12 months, in megagrams; and PVi = MACT model point value for each resin or gel coat used within the past 12 months, in kilograms of HAP per megagram of material applied. [40 CFR 63.5710(c)] Federally Enforceable Through Title V Permit
12. The MACT model point values for all resins and gel coats applied shall be determined using the formulas listed in Table 3 of 40 CFR 63, Subpart VVVV: atomized resin - $[0.014 \times (\text{Resin HAP\%, by weight})^{2.425}]$; atomized resin, plus vacuum bagging with roll out - $[0.01185 \times (\text{Resin HAP\%, by weight})^{2.425}]$; atomized resin, plus vacuum bagging without roll out - $[0.00945 \times (\text{Resin HAP\%, by weight})^{2.425}]$; nonatomized resin - $[0.014 \times (\text{Resin HAP\%, by weight})^{2.275}]$; nonatomized resin, plus bagging with roll out - $[0.0110 \times (\text{Resin HAP\%, by weight})^{2.275}]$; nonatomized resin, plus bagging without roll out - $[0.0076 \times (\text{Resin HAP\%, by weight})^{2.275}]$. [40 CFR 63.5710(d)] Federally Enforceable Through Title V Permit
13. Permittee shall use cleaning solvents that contain no more than 5% by weight of organic HAP content for routine cleaning of resin and gel coat application equipment. For removal of cured resin and gel coat from application equipment, no organic HAP content limit applies. [40 CFR 63.5734(a)] Federally Enforceable Through Title V Permit
14. Organic HAP-containing solvents used for removing cured resin or gel coat shall be stored in containers with covers. The covers must have no visible gaps and shall be in place at all times, except when equipment to be cleaned is placed in or removed from the container. On containers with a capacity greater than 2 gallons, the distance from the top of the container to the solvent surface must be equal to or greater than 0.75 times the diameter of the container. [40 CFR 63.5734(b)] Federally Enforceable Through Title V Permit
15. All gel coat and resin mixing containers with a capacity equal to or greater than 55 gallons, including those used for on-site mixing of putties and polyputties shall have a cover. The covers shall have no visible gaps and shall be in place at all times, except when material is being manually added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container. [40 CFR 63.5731(a)(b)] Federally Enforceable Through Title V Permit
16. At least once per month, 55 gallon or greater mixing containers and containers holding organic HAP containing solvents used for removing cured resin or gel coat must be inspected to ensure the covers have no visible gaps. Records of the inspections and any repairs made to the covers must be kept. [40 CFR 63.5731(c)(d) and 63.5737(c)] Federally Enforceable Through Title V Permit
17. Permittee shall use adhesives that contain no more than 5% by weight of organic HAP content for all carpet and fabric operations. [40 CFR 63.5740(a)] Federally Enforceable Through Title V Permit
18. Permittee shall maintain a record of the organic HAP content of cleaning solvents used for routine cleaning of resin and gel coat application equipment and adhesives used for all carpet and fabric operations. [40 CFR 63.5737(a) and 63.5740(b)] Federally Enforceable Through Title V Permit
19. Permittee shall determine HAP content of affected materials using one or more of the methods outlined in 40 CFR 63.5758. [40 CFR 63.5758] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

20. Permittee shall submit a notification of compliance status to the District no later than 30 days after the end of the first 12-month averaging period. The notification shall include the following: type and quantity of HAP's emitted at the facility; the method used to determine compliance; the method that will be used to determine continuing compliance; and a statement by the permittee as to whether the facility has complied with the HAP content limits. If there is a change to information submitted in the notification, changes shall be submitted in writing within 15 days after the change. [40 CFR 63.5761] Federally Enforceable Through Title V Permit
21. Permittee shall submit a compliance report to the District every 6 months. The first compliance report shall be submitted no later than 60 days after 12/31/05. Each subsequent report shall cover the applicable semiannual reporting period from January 1 through June 30 or from July 1 through December 31. Each subsequent compliance report shall be submitted no later than 60 days after the end of the semiannual reporting period. [40 CFR 63.5764(b)] Federally Enforceable Through Title V Permit
22. The compliance report shall include the following information: (1) Company name and address; (2) Signed and dated statement by a responsible official certifying the truth, accuracy, and completeness of the report; (3) Dates covered by the compliance report; (4) Description of any changes in the manufacturing process since the last compliance report; (5) Table or statement showing, for each regulated operation, the applicable organic HAP content limit and application equipment requirement with which the facility is complying and the actual weighted-average organic HAP content for each operation during each of the rolling 12-month averaging periods that end during the reporting period; (6) If compliance is achieved during the reporting period, a statement indicating such effect shall be included with the report; and (7) If any of the regulated operations were not in compliance during the reporting period, the following shall be included with the semiannual compliance report: (i) Operation(s) involved in the deviation; (ii) quantity, organic HAP content, and application method of the materials involved in the deviation; (iii) actions taken to minimize the deviation and to prevent it in the future; and (iv) Statement of whether or not the facility was in compliance for the 12-month averaging period that ended at the end of the reporting period. [40 CFR 63.5764(c)] Federally Enforceable Through Title V Permit
23. The following exemptions apply to the gel coat and resin operations: (1) Gel coat materials used for part/mold repair and touch up shall be exempt from the organic HAP content limits. The total gel coat materials used in this exemption shall not exceed 1 percent by weight of all gel coat used at the facility on a 12-month rolling-average basis. Records shall be kept of the amount of gel coats used per month for which this exemption is being used and copies of calculations showing that the exempt amount does not exceed 1 percent of all gel coat used. (2) Pure 100% vinyl ester resin used for skin coats. The total resin materials included in the exemption shall not exceed 5% by weight of all resin used at the facility on a 12-month rolling-average basis. Records shall be kept of the amount of 100 percent vinyl ester skin coat used per month for which this exemption is being used and copies of calculations showing that the exempt amount does not exceed 5% percent of all resin used. [40 CFR 63.5698(d)] Federally Enforceable Through Title V Permit
24. Permittee shall maintain the following records, in addition to those records required by conditions of this permit: (1) a copy of each notification and report submitted to the District; (2) Support documentation for any notice or report submitted to the District; (3) Total amounts of each production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat used per month and the weighted-average organic HAP content for each operation, expressed as weight percent (this record is not required for an operation if all materials used for that operation comply with the organic HAP content requirements); (4) for production resin and tooling resin the amounts of each applied by atomized or nonatomized methods. [40 CFR 63.5767] Federally Enforceable Through Title V Permit
25. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2520, 9.4.2 and 4684] 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-1246-2-3

EXPIRATION DATE: 09/30/2009

EQUIPMENT DESCRIPTION:

GEL COAT OPERATION SERVED BY SPRAY BOOTH #2 (BLEEKER BROS. STANDARD F-207.3 HP)

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. The monomer content of polyester materials used at this facility shall be equal to or less than the following: for polyester resins, 35% by weight; for pigmented gel coats, 45% by weight; for specialty resins and clear gel coats, 50% by weight. [District Rule 4684, 5.1.1.1] Federally Enforceable Through Title V Permit
3. Spray application of polyester resin shall only be performed using airless, air assisted airless, or high-volume low-pressure (HVLP) spray equipment. [District Rule 4684, 5.1.2] Federally Enforceable Through Title V Permit
4. 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 polyester resin application equipment: 25 g/l (0.21 lb/gal). [District Rule 4684, 5.3.1] Federally Enforceable Through Title V Permit
5. Permittee shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in self-closing, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4684, 5.4] Federally Enforceable Through Title V Permit
6. Permittee shall maintain the following records: daily records of the type and quantity of all coatings, resins, catalysts, and cleaning materials used in each operation; records of the VOC content, in weight percent, of all polyester resin materials used or stored at the facility; records of the VOC content of all cleaning materials used and stored at the facility. [District Rule 4684, 6.1] Federally Enforceable Through Title V Permit
7. Compliance using the emissions averaging requirements of 40 CFR Part 63, Subpart VVVV shall be demonstrated on a 12-month rolling-average basis and shall be determined at the end of every month (12 times per year). The first 12-month period begins on August 23, 2004. [40 CFR 63.5710(a)] Federally Enforceable Through Title V Permit
8. On August 23, 2005 and at the end of every subsequent month, permittee shall use Equation 1 of 40 CFR 63.5710(b) to demonstrate that the organic HAP emissions from this facility do not exceed the organic HAP emission limit determined by Equation 1 of 40 CFR 63.5698(b), for the same 12-month period. [40 CFR 63.5710(b)] Federally Enforceable Through Title V Permit
9. The organic HAP emissions from this facility shall not exceed the limit established by Equation 1 of 40 CFR 63.5698(b): $HAP\ Limit = [(46 \times Mr) + (159 \times Mpg) + (291 \times Mcg) + (54 \times Mtr) + (214 \times Mtg)]$, where Mr = mass of production resins used in the past 12 months; Mpg = mass of pigmented gel coats used in the past 12 months; Mcg = mass of clear gel coats used in the past 12 months; Mtr = mass of tooling resins used in the past 12 months; and Mtg = mass of tooling gel coats used in the past 12 months. All units are in megagrams. [40 CFR 63.5698(b)] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

10. On August 23, 2005 and at the end of every subsequent month, permittee shall calculate actual HAP emissions from the preceding 12 months using Equation 1 of 40 CFR 63.5710(b): $\text{Actual HAP Emissions} = (\text{PVr} \times \text{Mr}) + (\text{PVpg} \times \text{Mpg}) + (\text{PVcg} \times \text{Mcg}) + (\text{PVtr} \times \text{Mtr}) + (\text{PVtg} \times \text{Mtg})$, where PVr = weighted-average MACT model point value for production resin used in the past 12 months; Mr = mass of production resin used in the past 12 months; PVpg = weighted-average MACT model point value for pigmented gel coat used in the past 12 months; Mpg = mass of pigmented gel coats used in the past 12 months; PVcg = weighted-average MACT model point value for clear gel coat used in the past 12 months; Mcg = mass of clear gel coats used in the past 12 months; PVtr = weighted-average MACT model point value for tooling resin used in the past 12 months; Mtr = mass of tooling resins used in the past 12 months; PVtg = weighted-average MACT model point value for tooling gel coat used in the past 12 months; and Mtg = mass of tooling gel coats used in the past 12 months. All mass units are in megagrams and all weighted-average MACT model point values are in kilograms per megagram. [40 CFR 63.5710(b)] Federally Enforceable Through Title V Permit
11. The weighted-average MACT point values for each resin or gel coat used by this facility shall be determined using Equation 2 of 40 CFR 63.5710(c): $\text{Weighted-Average MACT Point Value (PVr, PVpg, PVcg, PVtr and PVtg)} = [\text{summation of (Mi} \times \text{PVi)}] / [\text{summation of Mi}]$, where Mi = mass of each resin or gel coat used within the past 12 months, in megagrams; and PVi = MACT model point value for each resin or gel coat used within the past 12 months, in kilograms of HAP per megagram of material applied. [40 CFR 63.5710(c)] Federally Enforceable Through Title V Permit
12. The MACT model point values for all resins and gel coats applied shall be determined using the formulas listed in Table 3 of 40 CFR 63, Subpart VVVV: atomized resin - $[0.014 \times (\text{Resin HAP\%, by weight})^{2.425}]$; atomized resin, plus vacuum bagging with roll out - $[0.01185 \times (\text{Resin HAP\%, by weight})^{2.425}]$; atomized resin, plus vacuum bagging without roll out - $[0.00945 \times (\text{Resin HAP\%, by weight})^{2.425}]$; nonatomized resin - $[0.014 \times (\text{Resin HAP\%, by weight})^{2.275}]$; nonatomized resin, plus bagging with roll out - $[0.0110 \times (\text{Resin HAP\%, by weight})^{2.275}]$; nonatomized resin, plus bagging without roll out - $[0.0076 \times (\text{Resin HAP\%, by weight})^{2.275}]$. [40 CFR 63.5710(d)] Federally Enforceable Through Title V Permit
13. Permittee shall use cleaning solvents that contain no more than 5% by weight of organic HAP content for routine cleaning of resin and gel coat application equipment. For removal of cured resin and gel coat from application equipment, no organic HAP content limit applies. [40 CFR 63.5734(a)] Federally Enforceable Through Title V Permit
14. Organic HAP-containing solvents used for removing cured resin or gel coat shall be stored in containers with covers. The covers must have no visible gaps and shall be in place at all times, except when equipment to be cleaned is placed in or removed from the container. On containers with a capacity greater than 2 gallons, the distance from the top of the container to the solvent surface must be equal to or greater than 0.75 times the diameter of the container. [40 CFR 63.5734(b)] Federally Enforceable Through Title V Permit
15. All gel coat and resin mixing containers with a capacity equal to or greater than 55 gallons, including those used for on-site mixing of putties and polyputties shall have a cover. The covers shall have no visible gaps and shall be in place at all times, except when material is being manually added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container. [40 CFR 63.5731(a)(b)] Federally Enforceable Through Title V Permit
16. At least once per month, 55 gallon or greater mixing containers and containers holding organic HAP containing solvents used for removing cured resin or gel coat must be inspected to ensure the covers have no visible gaps. Records of the inspections and any repairs made to the covers must be kept. [40 CFR 63.5731(c)(d) and 63.5737(c)] Federally Enforceable Through Title V Permit
17. Permittee shall use adhesives that contain no more than 5% by weight of organic HAP content for all carpet and fabric operations. [40 CFR 63.5740(a)] Federally Enforceable Through Title V Permit
18. Permittee shall maintain a record of the organic HAP content of cleaning solvents used for routine cleaning of resin and gel coat application equipment and adhesives used for all carpet and fabric operations. [40 CFR 63.5737(a) and 63.5740(b)] Federally Enforceable Through Title V Permit
19. Permittee shall determine HAP content of affected materials using one or more of the methods outlined in 40 CFR 63.5758. [40 CFR 63.5758] Federally Enforceable Through Title V Permit

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

20. Permittee shall submit a notification of compliance status to the District no later than 30 days after the end of the first 12-month averaging period. The notification shall include the following: type and quantity of HAP's emitted at the facility; the method used to determine compliance; the method that will be used to determine continuing compliance; and a statement by the permittee as to whether the facility has complied with the HAP content limits. If there is a change to information submitted in the notification, changes shall be submitted in writing within 15 days after the change. [40 CFR 63.5761] Federally Enforceable Through Title V Permit
21. Permittee shall submit a compliance report to the District every 6 months. The first compliance report shall be submitted no later than 60 days after 12/31/05. Each subsequent report shall cover the applicable semiannual reporting period from January 1 through June 30 or from July 1 through December 31. Each subsequent compliance report shall be submitted no later than 60 days after the end of the semiannual reporting period. [40 CFR 63.5764(b)] Federally Enforceable Through Title V Permit
22. The compliance report shall include the following information: (1) Company name and address; (2) Signed and dated statement by a responsible official certifying the truth, accuracy, and completeness of the report; (3) Dates covered by the compliance report; (4) Description of any changes in the manufacturing process since the last compliance report; (5) Table or statement showing, for each regulated operation, the applicable organic HAP content limit and application equipment requirement with which the facility is complying and the actual weighted-average organic HAP content for each operation during each of the rolling 12-month averaging periods that end during the reporting period; (6) If compliance is achieved during the reporting period a statement indicating such effect shall be included with the report; and (7) If any of the regulated operations were not in compliance during the reporting period, the following shall be included with the semiannual compliance report: (i) Operation(s) involved in the deviation; (ii) quantity, organic HAP content, and application method of the materials involved in the deviation; (iii) actions taken to minimize the deviation and to prevent it in the future; and (iv) Statement of whether or not the facility was in compliance for the 12-month averaging period that ended at the end of the reporting period. [40 CFR 63.5764(c)] Federally Enforceable Through Title V Permit
23. The following exemptions apply to the gel coat and resin operations: (1) Gel coat materials used for part/mold repair and touch up shall be exempt from the organic HAP content limits. The total gel coat materials used in this exemption shall not exceed 1 percent by weight of all gel coat used at the facility on a 12-month rolling-average basis. Records shall be kept of the amount of gel coats used per month for which this exemption is being used and copies of calculations showing that the exempt amount does not exceed 1 percent of all gel coat used. (2) Pure 100% vinyl ester resin used for skin coats. The total resin materials included in the exemption shall not exceed 5% by weight of all resin used at the facility on a 12-month rolling-average basis. Records shall be kept of the amount of 100 percent vinyl ester skin coat used per month for which this exemption is being used and copies of calculations showing that the exempt amount does not exceed 5% percent of all resin used. [40 CFR 63.5698(d)] Federally Enforceable Through Title V Permit
24. Permittee shall maintain the following records, in addition to those records required by conditions of this permit: (1) a copy of each notification and report submitted to the District; (2) Support documentation for any notice or report submitted to the District; (3) Total amounts of each production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat used per month and the weighted-average organic HAP content for each operation, expressed as weight percent (this record is not required for an operation if all materials used for that operation comply with the organic HAP content requirements); (4) for production resin and tooling resin the amounts of each applied by atomized or nonatomized methods. [40 CFR 63.5767] Federally Enforceable Through Title V Permit
25. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2520, 9.4.2 and 4684] 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-1246-3-2

EXPIRATION DATE: 09/30/2009

EQUIPMENT DESCRIPTION:

GRINDING OPERATION SERVED BY SPRAY BOOTH #3 (BLEEKER BROS. STANDARD F-12-7, 2HP)

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. All filters shall be properly maintained and must be in place during the grinding operation. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Exhaust fans shall be switched on prior to the start of the grinding operation. [District NSR Rule] 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-1246-4-2

EXPIRATION DATE: 09/30/2009

EQUIPMENT DESCRIPTION:

WOODWORKING OPERATION CONSISTING OF ONE (1) TABLE SAW, ONE (1) BAND SAW, ONE (1) MITRE SAW, TWO (2) WORMDRIVE SAWS, ONE (1) SKILL SAW, AND TWO (2) SANDERS

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

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1246-5-3

EXPIRATION DATE: 09/30/2009

EQUIPMENT DESCRIPTION:

WOODWORKING OPERATION CONSISTING OF ONE (1) ROUTER, ONE (1) CHOP SAW, AND ONE (1) BAND SAW. THE ROUTER IS SERVED BY A MURPHY RODGERS, MODEL NO. MRT-9A, DUST COLLECTOR

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Visible emissions shall be inspected quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
3. Dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
4. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
5. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
6. Material removed from the dust collector shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
7. A spare bag shall be maintained on the premises at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The dust collector cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Visible emissions from the baghouse 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 NSR Rule] Federally Enforceable Through Title V Permit
10. All ducting from the woodworking equipment to the dust collector shall be properly maintained to prevent fugitive dust emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
11. The amount of sawdust collected in the dust collector shall not exceed 400.0 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
12. The PM10 emissions shall not exceed 0.004 pounds per pound of sawdust collected. [District NSR Rule] Federally Enforceable Through Title V Permit
13. A daily log shall be maintained and shall include the date and quantity of sawdust collected. [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.

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

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

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ATTACHMENT B

Previous Title V Operating Permit



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT



HEALTHY AIR LIVING™

Permit to Operate

FACILITY: N-1246

EXPIRATION DATE: 09/30/2009

LEGAL OWNER OR OPERATOR:
MAILING ADDRESS:

FINELINE INDUSTRIES, INC.
455 GROGAN AVENUE
MERCED, CA 95341

FACILITY LOCATION:

455 GROGAN AVENUE
MERCED, CA

FACILITY DESCRIPTION:

MANUFACTURER OF FIBERGLASS BOATS

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.

Seyed Sadredin
Executive Director / APCO

David Warner
Director of Permit Services

San Joaquin Valley Air Pollution Control District

FACILITY: N-1246-0-1

EXPIRATION DATE: 09/30/2009

FACILITY-WIDE REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. 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
3. 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
4. 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
5. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (3/21/02). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
6. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.12.1] Federally Enforceable Through Title V Permit
7. 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
8. 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
9. 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
10. 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

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: FINELINE INDUSTRIES, INC.
Location: 455 GROGAN AVENUE, MERCED, CA
N-1246-0-1: Aug 19 2010 1:10PM - SIONGCOJ

11. 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
12. 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
13. 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
14. 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
15. 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
16. 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
17. 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
18. 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
19. 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
20. 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
21. 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
22. 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
23. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (11/15/01). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

24. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in the Table of Standards of District Rule 4601 (10/31/01) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
25. All VOC-containing materials for architectural coatings subject to Rule 4601 (10/31/01) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
26. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (10/31/01). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
27. 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
28. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
29. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR 82, Subpart B. [40 CFR 82, Subpart B] Federally Enforceable Through Title V Permit
30. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8021 and 8011] Federally Enforceable Through Title V Permit
31. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8031 and 8011] Federally Enforceable Through Title V Permit
32. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8041 and 8011] Federally Enforceable Through Title V Permit
33. Whenever open areas are disturbed or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8051 and 8011] Federally Enforceable Through Title V Permit
34. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8061 and Rule 8011] Federally Enforceable Through Title V Permit
35. Any unpaved vehicle/equipment area that anticipates more than 75 vehicle trips per day shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 100 vehicle trips per day shall comply with the requirements of Section 5.1.2 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8071 and Rule 8011] Federally Enforceable Through Title V Permit
36. 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

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

37. 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
38. 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
39. 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
40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), and Rule 111 (Kern, Tulare, Kings). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (11/15/01); 4601, sections 5.1, 5.2, 5.3, 5.8 and 8.0 (10/31/01); 8021 (11/15/01); 8031 (11/15/01); 8041 (11/15/01); 8051 (11/15/01); 8061 (11/15/01); and 8071 (11/15/01). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
42. On February 28, 2005, the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin January 1 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1246-1-1

EXPIRATION DATE: 09/30/2009

EQUIPMENT DESCRIPTION:

GEL COAT OPERATION SERVED BY SPRAY BOOTH #1 (BLEEKER BROS. STANDARD F-20-7, 3HP)

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. The monomer content of polyester materials used at this facility shall be equal to or less than the following: for polyester resins, 35% by weight; for pigmented gel coats, 45% by weight; for specialty resins and clear gel coats, 50% by weight. [District Rule 4684, 5.1.1.1] Federally Enforceable Through Title V Permit
3. Spray application of polyester resin shall only be performed using airless, air assisted airless, or high-volume low-pressure (HVLP) spray equipment. [District Rule 4684, 5.1.2] Federally Enforceable Through Title V Permit
4. 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: 50 g/l (0.42 lb/gal), and cleaning of polyester resin application equipment: 50 g/l (0.42 lb/gal). [District Rule 4684, 5.4.3] Federally Enforceable Through Title V Permit
5. Permittee shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in self-closing, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4684, 5.4.9] Federally Enforceable Through Title V Permit
6. Permittee shall maintain the following records: daily records of the type and quantity of all coatings, resins, catalysts, and cleaning materials used in each operation; records of the VOC content, in weight percent, of all polyester resin materials used or stored at the facility; records of the VOC content of all cleaning materials used and stored at the facility. [District Rule 4684, 6.1.1] Federally Enforceable Through Title V Permit
7. Compliance using the emissions averaging requirements of 40 CFR Part 63, Subpart VVVV shall be demonstrated on a 12-month rolling-average basis and shall be determined at the end of every month (12 times per year). The first 12-month period begins on August 23, 2004. [40 CFR 63.5710(a)] Federally Enforceable Through Title V Permit
8. On August 23, 2005 and at the end of every subsequent month, permittee shall use Equation 1 of 40 CFR 63.5710(b) to demonstrate that the organic HAP emissions from this facility do not exceed the organic HAP emission limit determined by Equation 1 of 40 CFR 63.5698(b), for the same 12-month period. [40 CFR 63.5710(b)] Federally Enforceable Through Title V Permit
9. The organic HAP emissions from this facility shall not exceed the limit established by Equation 1 of 40 CFR 63.5698(b): $HAP\ Limit = [(46 \times Mr) + (159 \times Mpg) + (291 \times Mcg) + (54 \times Mtr) + (214 \times Mtg)]$, where Mr = mass of production resins used in the past 12 months; Mpg = mass of pigmented gel coats used in the past 12 months; Mcg = mass of clear gel coats used in the past 12 months; Mtr = mass of tooling resins used in the past 12 months; and Mtg = mass of tooling gel coats used in the past 12 months. All units are in megagrams. [40 CFR 63.5698(b)] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

10. On August 23, 2005 and at the end of every subsequent month, permittee shall calculate actual HAP emissions from the preceding 12 months using Equation 1 of 40 CFR 63.5710(b): $\text{Actual HAP Emissions} = (\text{PVr} \times \text{Mr}) + (\text{PVpg} \times \text{Mpg}) + (\text{PVcg} \times \text{Mcg}) + (\text{PVtr} \times \text{Mtr}) + (\text{PVtg} \times \text{Mtg})$, where PVr = weighted-average MACT model point value for production resin used in the past 12 months; Mr = mass of production resin used in the past 12 months; PVpg = weighted-average MACT model point value for pigmented gel coat used in the past 12 months; Mpg = mass of pigmented gel coats used in the past 12 months; PVcg = weighted-average MACT model point value for clear gel coat used in the past 12 months; Mcg = mass of clear gel coats used in the past 12 months; PVtr = weighted-average MACT model point value for tooling resin used in the past 12 months; Mtr = mass of tooling resins used in the past 12 months; PVtg = weighted-average MACT model point value for tooling gel coat used in the past 12 months; and Mtg = mass of tooling gel coats used in the past 12 months. All mass units are in megagrams and all weighted-average MACT model point values are in kilograms per megagram. [40 CFR 63.5710(b)] Federally Enforceable Through Title V Permit
11. The weighted-average MACT point values for each resin or gel coat used by this facility shall be determined using Equation 2 of 40 CFR 63.5710(c): $\text{Weighted-Average MACT Point Value (PVr, PVpg, PVcg, PVtr and PVtg)} = [\text{summation of (Mi} \times \text{PVi)}] / [\text{summation of Mi}]$, where Mi = mass of each resin or gel coat used within the past 12 months, in megagrams; and PVi = MACT model point value for each resin or gel coat used within the past 12 months, in kilograms of HAP per megagram of material applied. [40 CFR 63.5710(c)] Federally Enforceable Through Title V Permit
12. The MACT model point values for all resins and gel coats applied shall be determined using the formulas listed in Table 3 of 40 CFR 63, Subpart VVVV: atomized resin - $[0.014 \times (\text{Resin HAP\%, by weight})^{2.425}]$; atomized resin, plus vacuum bagging with roll out - $[0.01185 \times (\text{Resin HAP\%, by weight})^{2.425}]$; atomized resin, plus vacuum bagging without roll out - $[0.00945 \times (\text{Resin HAP\%, by weight})^{2.425}]$; nonatomized resin - $[0.014 \times (\text{Resin HAP\%, by weight})^{2.275}]$; nonatomized resin, plus bagging with roll out - $[0.0110 \times (\text{Resin HAP\%, by weight})^{2.275}]$; nonatomized resin, plus bagging without roll out - $[0.0076 \times (\text{Resin HAP\%, by weight})^{2.275}]$. [40 CFR 63.5710(d)] Federally Enforceable Through Title V Permit
13. Permittee shall use cleaning solvents that contain no more than 5% by weight of organic HAP content for routine cleaning of resin and gel coat application equipment. For removal of cured resin and gel coat from application equipment, no organic HAP content limit applies. [40 CFR 63.5734(a)] Federally Enforceable Through Title V Permit
14. Organic HAP-containing solvents used for removing cured resin or gel coat shall be stored in containers with covers. The covers must have no visible gaps and shall be in place at all times, except when equipment to be cleaned is placed in or removed from the container. On containers with a capacity greater than 2 gallons, the distance from the top of the container to the solvent surface must be equal to or greater than 0.75 times the diameter of the container. [40 CFR 63.5734(b)] Federally Enforceable Through Title V Permit
15. All gel coat and resin mixing containers with a capacity equal to or greater than 55 gallons, including those used for on-site mixing of putties and polyputties shall have a cover. The covers shall have no visible gaps and shall be in place at all times, except when material is being manually added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container. [40 CFR 63.5731(a)(b)] Federally Enforceable Through Title V Permit
16. At least once per month, 55 gallon or greater mixing containers and containers holding organic HAP containing solvents used for removing cured resin or gel coat must be inspected to ensure the covers have no visible gaps. Records of the inspections and any repairs made to the covers must be kept. [40 CFR 63.5731(c)(d) and 63.5737(c)] Federally Enforceable Through Title V Permit
17. Permittee shall use adhesives that contain no more than 5% by weight of organic HAP content for all carpet and fabric operations. [40 CFR 63.5740(a)] Federally Enforceable Through Title V Permit
18. Permittee shall maintain a record of the organic HAP content of cleaning solvents used for routine cleaning of resin and gel coat application equipment and adhesives used for all carpet and fabric operations. [40 CFR 63.5737(a) and 63.5740(b)] Federally Enforceable Through Title V Permit
19. Permittee shall determine HAP content of affected materials using one or more of the methods outlined in 40 CFR 63.5758. [40 CFR 63.5758] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

20. Permittee shall submit a notification of compliance status to the District no later than 30 days after the end of the first 12-month averaging period. The notification shall include the following: type and quantity of HAP's emitted at the facility; the method used to determine compliance; the method that will be used to determine continuing compliance; and a statement by the permittee as to whether the facility has complied with the HAP content limits. If there is a change to information submitted in the notification, changes shall be submitted in writing within 15 days after the change. [40 CFR 63.5761] Federally Enforceable Through Title V Permit
21. Permittee shall submit a compliance report to the District every 6 months. The first compliance report shall be submitted no later than 60 days after 12/31/05. Each subsequent report shall cover the applicable semiannual reporting period from January 1 through June 30 or from July 1 through December 31. Each subsequent compliance report shall be submitted no later than 60 days after the end of the semiannual reporting period. [40 CFR 63.5764(b)] Federally Enforceable Through Title V Permit
22. The compliance report shall include the following information: (1) Company name and address; (2) Signed and dated statement by a responsible official certifying the truth, accuracy, and completeness of the report; (3) Dates covered by the compliance report; (4) Description of any changes in the manufacturing process since the last compliance report; (5) Table or statement showing, for each regulated operation, the applicable organic HAP content limit and application equipment requirement with which the facility is complying and the actual weighted-average organic HAP content for each operation during each of the rolling 12-month averaging periods that end during the reporting period; (6) If compliance is achieved during the reporting period, a statement indicating such effect shall be included with the report; and (7) If any of the regulated operations were not in compliance during the reporting period, the following shall be included with the semiannual compliance report: (i) Operation(s) involved in the deviation; (ii) quantity, organic HAP content, and application method of the materials involved in the deviation; (iii) actions taken to minimize the deviation and to prevent it in the future; and (iv) Statement of whether or not the facility was in compliance for the 12-month averaging period that ended at the end of the reporting period. [40 CFR 63.5764(c)] Federally Enforceable Through Title V Permit
23. The following exemptions apply to the gel coat and resin operations: (1) Gel coat materials used for part/mold repair and touch up shall be exempt from the organic HAP content limits. The total gel coat materials used in this exemption shall not exceed 1 percent by weight of all gel coat used at the facility on a 12-month rolling-average basis. Records shall be kept of the amount of gel coats used per month for which this exemption is being used and copies of calculations showing that the exempt amount does not exceed 1 percent of all gel coat used. (2) Pure 100% vinyl ester resin used for skin coats. The total resin materials included in the exemption shall not exceed 5% by weight of all resin used at the facility on a 12-month rolling-average basis. Records shall be kept of the amount of 100 percent vinyl ester skin coat used per month for which this exemption is being used and copies of calculations showing that the exempt amount does not exceed 5% percent of all resin used. [40 CFR 63.5698(d)] Federally Enforceable Through Title V Permit
24. Permittee shall maintain the following records, in addition to those records required by conditions of this permit: (1) a copy of each notification and report submitted to the District; (2) Support documentation for any notice or report submitted to the District; (3) Total amounts of each production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat used per month and the weighted-average organic HAP content for each operation, expressed as weight percent (this record is not required for an operation if all materials used for that operation comply with the organic HAP content requirements); (4) for production resin and tooling resin the amounts of each applied by atomized or nonatomized methods. [40 CFR 63.5767] Federally Enforceable Through Title V Permit
25. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2520, 9.4.2 and 4684] 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-1246-2-1

EXPIRATION DATE: 09/30/2009

EQUIPMENT DESCRIPTION:

GEL COAT OPERATION SERVED BY SPRAY BOOTH #2 (BLEEKER BROS. STANDARD F-20-7, 3 HP)

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. The monomer content of polyester materials used at this facility shall be equal to or less than the following: for polyester resins, 35% by weight; for pigmented gel coats, 45% by weight; for specialty resins and clear gel coats, 50% by weight. [District Rule 4684, 5.1.1.1] Federally Enforceable Through Title V Permit
3. Spray application of polyester resin shall only be performed using airless, air assisted airless, or high-volume low-pressure (HVLP) spray equipment. [District Rule 4684, 5.1.2] Federally Enforceable Through Title V Permit
4. 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: 50 g/l (0.42 lb/gal), and cleaning of polyester resin application equipment: 50 g/l (0.42 lb/gal). [District Rule 4684, 5.4.3] Federally Enforceable Through Title V Permit
5. Permittee shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in self-closing, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4684, 5.4.9] Federally Enforceable Through Title V Permit
6. Permittee shall maintain the following records: daily records of the type and quantity of all coatings, resins, catalysts, and cleaning materials used in each operation; records of the VOC content, in weight percent, of all polyester resin materials used or stored at the facility; records of the VOC content of all cleaning materials used and stored at the facility. [District Rule 4684, 6.1.1] Federally Enforceable Through Title V Permit
7. Compliance using the emissions averaging requirements of 40 CFR Part 63, Subpart VVVV shall be demonstrated on a 12-month rolling-average basis and shall be determined at the end of every month (12 times per year). The first 12-month period begins on August 23, 2004. [40 CFR 63.5710(a)] Federally Enforceable Through Title V Permit
8. On August 23, 2005 and at the end of every subsequent month, permittee shall use Equation 1 of 40 CFR 63.5710(b) to demonstrate that the organic HAP emissions from this facility do not exceed the organic HAP emission limit determined by Equation 1 of 40 CFR 63.5698(b), for the same 12-month period. [40 CFR 63.5710(b)] Federally Enforceable Through Title V Permit
9. The organic HAP emissions from this facility shall not exceed the limit established by Equation 1 of 40 CFR 63.5698(b): $HAP\ Limit = [(46 \times Mr) + (159 \times Mpg) + (291 \times Mcg) + (54 \times Mtr) + (214 \times Mtg)]$, where Mr = mass of production resins used in the past 12 months; Mpg = mass of pigmented gel coats used in the past 12 months; Mcg = mass of clear gel coats used in the past 12 months; Mtr = mass of tooling resins used in the past 12 months; and Mtg = mass of tooling gel coats used in the past 12 months. All units are in megagrams. [40 CFR 63.5698(b)] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

10. On August 23, 2005 and at the end of every subsequent month, permittee shall calculate actual HAP emissions from the preceding 12 months using Equation 1 of 40 CFR 63.5710(b): Actual HAP Emissions = (PVr x Mr) + (PVpg x Mpg) + (PVcg x Mcg) + (PVtr x Mtr) + (PVtg x Mtg), where PVr = weighted-average MACT model point value for production resin used in the past 12 months; Mr = mass of production resin used in the past 12 months; PVpg = weighted-average MACT model point value for pigmented gel coat used in the past 12 months; Mpg = mass of pigmented gel coats used in the past 12 months; PVcg = weighted-average MACT model point value for clear gel coat used in the past 12 months; Mcg = mass of clear gel coats used in the past 12 months; PVtr = weighted-average MACT model point value for tooling resin used in the past 12 months; Mtr = mass of tooling resins used in the past 12 months; PVtg = weighted-average MACT model point value for tooling gel coat used in the past 12 months; and Mtg = mass of tooling gel coats used in the past 12 months. All mass units are in megagrams and all weighted-average MACT model point values are in kilograms per megagram. [40 CFR 63.5710(b)] Federally Enforceable Through Title V Permit
11. The weighted-average MACT point values for each resin or gel coat used by this facility shall be determined using Equation 2 of 40 CFR 63.5710(c): Weighted-Average MACT Point Value (PVr, PVpg, PVcg, PVtr and PVtg) = [summation of (Mi x PVi)] / [summation of Mi], where Mi = mass of each resin or gel coat used within the past 12 months, in megagrams; and PVi = MACT model point value for each resin or gel coat used within the past 12 months, in kilograms of HAP per megagram of material applied. [40 CFR 63.5710(c)] Federally Enforceable Through Title V Permit
12. The MACT model point values for all resins and gel coats applied shall be determined using the formulas listed in Table 3 of 40 CFR 63, Subpart VVVV: atomized resin - $[0.014 \times (\text{Resin HAP\%, by weight})^{2.425}]$; atomized resin, plus vacuum bagging with roll out - $[0.01185 \times (\text{Resin HAP\%, by weight})^{2.425}]$; atomized resin, plus vacuum bagging without roll out - $[0.00945 \times (\text{Resin HAP\%, by weight})^{2.425}]$; nonatomized resin - $[0.014 \times (\text{Resin HAP\%, by weight})^{2.275}]$; nonatomized resin, plus bagging with roll out - $[0.0110 \times (\text{Resin HAP\%, by weight})^{2.275}]$; nonatomized resin, plus bagging without roll out - $[0.0076 \times (\text{Resin HAP\%, by weight})^{2.275}]$. [40 CFR 63.5710(d)] Federally Enforceable Through Title V Permit
13. Permittee shall use cleaning solvents that contain no more than 5% by weight of organic HAP content for routine cleaning of resin and gel coat application equipment. For removal of cured resin and gel coat from application equipment, no organic HAP content limit applies. [40 CFR 63.5734(a)] Federally Enforceable Through Title V Permit
14. Organic HAP-containing solvents used for removing cured resin or gel coat shall be stored in containers with covers. The covers must have no visible gaps and shall be in place at all times, except when equipment to be cleaned is placed in or removed from the container. On containers with a capacity greater than 2 gallons, the distance from the top of the container to the solvent surface must be equal to or greater than 0.75 times the diameter of the container. [40 CFR 63.5734(b)] Federally Enforceable Through Title V Permit
15. All gel coat and resin mixing containers with a capacity equal to or greater than 55 gallons, including those used for on-site mixing of putties and polyputties shall have a cover. The covers shall have no visible gaps and shall be in place at all times, except when material is being manually added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container. [40 CFR 63.5731(a)(b)] Federally Enforceable Through Title V Permit
16. At least once per month, 55 gallon or greater mixing containers and containers holding organic HAP containing solvents used for removing cured resin or gel coat must be inspected to ensure the covers have no visible gaps. Records of the inspections and any repairs made to the covers must be kept. [40 CFR 63.5731(c)(d) and 63.5737(c)] Federally Enforceable Through Title V Permit
17. Permittee shall use adhesives that contain no more than 5% by weight of organic HAP content for all carpet and fabric operations. [40 CFR 63.5740(a)] Federally Enforceable Through Title V Permit
18. Permittee shall maintain a record of the organic HAP content of cleaning solvents used for routine cleaning of resin and gel coat application equipment and adhesives used for all carpet and fabric operations. [40 CFR 63.5737(a) and 63.5740(b)] Federally Enforceable Through Title V Permit
19. Permittee shall determine HAP content of affected materials using one or more of the methods outlined in 40 CFR 63.5758. [40 CFR 63.5758] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

20. Permittee shall submit a notification of compliance status to the District no later than 30 days after the end of the first 12-month averaging period. The notification shall include the following: type and quantity of HAP's emitted at the facility; the method used to determine compliance; the method that will be used to determine continuing compliance; and a statement by the permittee as to whether the facility has complied with the HAP content limits. If there is a change to information submitted in the notification, changes shall be submitted in writing within 15 days after the change. [40 CFR 63.5761] Federally Enforceable Through Title V Permit
21. Permittee shall submit a compliance report to the District every 6 months. The first compliance report shall be submitted no later than 60 days after 12/31/05. Each subsequent report shall cover the applicable semiannual reporting period from January 1 through June 30 or from July 1 through December 31. Each subsequent compliance report shall be submitted no later than 60 days after the end of the semiannual reporting period. [40 CFR 63.5764(b)] Federally Enforceable Through Title V Permit
22. The compliance report shall include the following information: (1) Company name and address; (2) Signed and dated statement by a responsible official certifying the truth, accuracy, and completeness of the report; (3) Dates covered by the compliance report; (4) Description of any changes in the manufacturing process since the last compliance report; (5) Table or statement showing, for each regulated operation, the applicable organic HAP content limit and application equipment requirement with which the facility is complying and the actual weighted-average organic HAP content for each operation during each of the rolling 12-month averaging periods that end during the reporting period; (6) If compliance is achieved during the reporting period a statement indicating such effect shall be included with the report; and (7) If any of the regulated operations were not in compliance during the reporting period, the following shall be included with the semiannual compliance report: (i) Operation(s) involved in the deviation; (ii) quantity, organic HAP content, and application method of the materials involved in the deviation; (iii) actions taken to minimize the deviation and to prevent it in the future; and (iv) Statement of whether or not the facility was in compliance for the 12-month averaging period that ended at the end of the reporting period. [40 CFR 63.5764(c)] Federally Enforceable Through Title V Permit
23. The following exemptions apply to the gel coat and resin operations: (1) Gel coat materials used for part/mold repair and touch up shall be exempt from the organic HAP content limits. The total gel coat materials used in this exemption shall not exceed 1 percent by weight of all gel coat used at the facility on a 12-month rolling-average basis. Records shall be kept of the amount of gel coats used per month for which this exemption is being used and copies of calculations showing that the exempt amount does not exceed 1 percent of all gel coat used. (2) Pure 100% vinylester resin used for skin coats. The total resin materials included in the exemption shall not exceed 5% by weight of all resin used at the facility on a 12-month rolling-average basis. Records shall be kept of the amount of 100 percent vinylester skin coat used per month for which this exemption is being used and copies of calculations showing that the exempt amount does not exceed 5% percent of all resin used. [40 CFR 63.5698(d)] Federally Enforceable Through Title V Permit
24. Permittee shall maintain the following records, in addition to those records required by conditions of this permit: (1) a copy of each notification and report submitted to the District; (2) Support documentation for any notice or report submitted to the District; (3) Total amounts of each production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat used per month and the weighted-average organic HAP content for each operation, expressed as weight percent (this record is not required for an operation if all materials used for that operation comply with the organic HAP content requirements); (4) for production resin and tooling resin the amounts of each applied by atomized or nonatomized methods. [40 CFR 63.5767] Federally Enforceable Through Title V Permit
25. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2520, 9.4.2 and 4684] 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-1246-3-1

EXPIRATION DATE: 09/30/2009

EQUIPMENT DESCRIPTION:

GRINDING OPERATION SERVED BY SPRAY BOOTH #3 (BLEEKER BROS. STANDARD F-12-7, 2HP)

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. All filters shall be properly maintained and must be in place during the grinding operation. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Exhaust fans shall be switched on prior to the start of the grinding operation. [District NSR Rule] 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-1246-4-1

EXPIRATION DATE: 09/30/2009

EQUIPMENT DESCRIPTION:

WOODWORKING OPERATION CONSISTING OF ONE (1) TABLE SAW, ONE (1) BAND SAW, ONE (1) MITRE SAW, TWO (2) WORMDRIVE SAWS, ONE (1) SKILL SAW, AND TWO (2) SANDERS

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

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1246-5-2

EXPIRATION DATE: 09/30/2009

EQUIPMENT DESCRIPTION:

WOODWORKING OPERATION CONSISTING OF ONE (1) ROUTER, ONE (1) CHOP SAW, AND ONE (1) BAND SAW. THE ROUTER IS SERVED BY A MURPHY RODGERS, MODEL NO. MRT-9A, DUST COLLECTOR

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Visible emissions shall be inspected quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
3. Dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
4. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
5. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
6. Material removed from the dust collector shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
7. A spare bag shall be maintained on the premises at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The dust collector cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Visible emissions from the baghouse 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 NSR Rule] Federally Enforceable Through Title V Permit
10. All ducting from the woodworking equipment to the dust collector shall be properly maintained to prevent fugitive dust emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
11. The amount of sawdust collected in the dust collector shall not exceed 400.0 pounds in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
12. The PM10 emissions shall not exceed 0.004 pounds per pound of sawdust collected. [District NSR Rule] Federally Enforceable Through Title V Permit
13. A daily log shall be maintained and shall include the date and quantity of sawdust collected. [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.

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

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

ATTACHMENT C

Detailed Facility List

Detailed Facility Report
For Facility=1246 and excluding Deleted Permits
Sorted by Facility Name and Permit Number

FINELINE INDUSTRIES, INC. 455 GROGAN AVENUE MERCED, CA	FAC # N 1246 STATUS: A TELEPHONE: 2093840255	TYPE: TitleV TOXIC ID: 44	EXPIRE ON: 09/30/2009 AREA: 7/ INSP. DATE: 04/11
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PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
N-1246-1-1	3 HP	3020-01 A	1	87.00	87.00	A	GEL COAT OPERATION SERVED BY SPRAY BOOTH #1 (BLEEKER BROS. STANDARD F-20-7, 3HP)
N-1246-2-1	3 HP	3020-01 A	1	87.00	87.00	A	GEL COAT OPERATION SERVED BY SPRAY BOOTH #2 (BLEEKER BROS. STANDARD F-20-7, 3 HP)
N-1246-3-1	2 HP	3020-01 A	1	87.00	87.00	A	GRINDING OPERATION SERVED BY SPRAY BOOTH #3 (BLEEKER BROS. STANDARD F-12-7, 2HP)
N-1246-4-1	10 HP	3020-01 A	1	87.00	87.00	A	WOODWORKING OPERATION CONSISTING OF ONE (1) TABLE SAW, ONE (1) BAND SAW, ONE (1) MITRE SAW, TWO (2) WORMDRIVE SAWS, ONE (1) SKILL SAW, AND TWO (2) SANDERS
N-1246-5-2	16.75 HP	3020-01 A	1	87.00	87.00	A	WOODWORKING OPERATION CONSISTING OF ONE (1) ROUTER, ONE (1) CHOP SAW, AND ONE (1) BAND SAW. THE ROUTER IS SERVED BY A MURPHY RODGERS, MODEL NO. MRT-9A, DUST COLLECTOR

Number of Facilities Reported: 1