



**MAR 14 2011**

Robert Bartlett  
Modern Welding Company  
4141 N Brawley Ave  
Fresno, CA 93722

**Re: Notice of Preliminary Decision - Title V Permit Renewal  
District Facility # C-847  
Project # C-1100056**

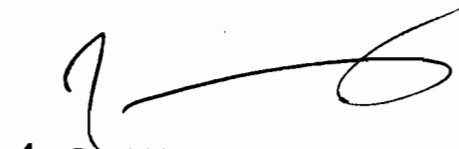
Dear Mr. Bartlett:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Modern Welding Company for its steel storage tank manufacturing operation located at 4141 N Brawley Ave in Fresno, California.

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

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

Sincerely,



David Warner  
Director of Permit Services

**Attachments**  
C: Gurpreet Brar, Permit Services Engineer

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

---

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

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

**Southern Region**  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
Tel: 661-392-5500 FAX: 661-392-5585



**MAR 14 2011**

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

**Re: Notice of Preliminary Decision - Title V Permit Renewal  
District Facility # C-847  
Project # C-1100056**

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 Modern Welding Company for its steel storage tank manufacturing operation located at 4141 N Brawley Ave in Fresno, California.

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

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

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**MAR 14 2011**

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

**Re: Notice of Preliminary Decision – Title V Permit Renewal  
District Facility # C-847  
Project # C-1100056**

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 Modern Welding Company for its steel storage tank manufacturing operation located at 4141 N Brawley Ave in Fresno, California.

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

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

Sincerely,



 David Warner  
Director of Permit Services

Attachments

C: Gurpreet Brar, Permit Services Engineer

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Fresno Bee

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

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District solicits public comment on the proposed renewal of the Federally Mandated Operating Permit to Modern Welding Company for its steel storage tank manufacturing operation located at 4141 N Brawley Ave in Fresno, California.

The District's analysis of the legal and factual basis for this proposed action, project #C-1100056, is available for public inspection at [http://www.valleyair.org/notices/public\\_notices\\_idx.htm](http://www.valleyair.org/notices/public_notices_idx.htm) and the District office at the address below. There are no emission changes associated with this proposed action. This will be the public's only opportunity to comment on the specific conditions of the proposed 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  
Modern Welding Company  
C-847**

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# **TITLE V PERMIT RENEWAL EVALUATION**

## **Steel Storage Tank Manufacturing**

**Engineer:** Gurpreet Brar  
**Date:** February 7, 2011

**Facility Number:** C-847  
**Facility Name:** Modern Welding Company  
**Mailing Address:** 4141 N Brawley Ave  
Fresno, CA 93722

**Contact Name:** Robert Bartlett  
**Phone:** (559) 275-9353

**Responsible Official:** Robert Bartlett  
Assistant Manager

**Project #:** C-1100056  
**Deemed Complete:** March 4, 2010

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### **I. PROPOSAL**

Modern Welding Company was issued a Title V permit on May 1, 1998. 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**

Modern Welding Company is located at 4141 N Brawley Ave in Fresno, CA.

### III. EQUIPMENT LISTING

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

### IV. GENERAL PERMIT TEMPLATE USAGE

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

#### **Template SJV-UM-0-3 Facility Wide Umbrella:**

The applicant has requested to utilize template No. SJV-UM-0-3, Facility Wide Umbrella. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

### V. SCOPE OF EPA AND PUBLIC REVIEW

Certain segments of the proposed 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.

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

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

Conditions 1 through 40 of the requirements for facility wide permit C-847-0-3.

## VI. FEDERALLY ENFORCEABLE REQUIREMENTS

### A. Rules Updated

- District Rule 2020, Exemptions  
(amended December 19, 2002 ⇒ amended December 20, 2007) <sup>1</sup>
- District Rule 2201, New and Modified Stationary Source Review Rule  
(amended September 21, 2006 ⇒ amended December 18, 2008)
- District Rule 4601, Architectural Coatings  
(amended October 31, 2001 ⇒ amended December 17, 2009) <sup>1</sup>
- District Rule 4603, Surface Coating of Metal Parts and Products, Plastic Parts And Products, And Pleasure Crafts (amended October 16, 2008 ⇒ amended September 17, 2009)
- District Rule 4684, Polyester Resin Operations (amended September 20, 2007 – SIP approved ⇒ amended September 17, 2009 – not SIP approved)
- 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) <sup>1</sup>
- District Rule 8031, Bulk Materials  
(adopted November 15, 2001 ⇒ amended August 19, 2004) <sup>1</sup>
- District Rule 8041, Carryout and Trackout  
(adopted November 15, 2001 ⇒ amended August 19, 2004) <sup>1</sup>
- District Rule 8051, Open Areas  
(adopted November 15, 2001 ⇒ amended August 19, 2004) <sup>1</sup>
- District Rule 8061, Paved and Unpaved Roads  
(adopted November 15, 2001 ⇒ amended August 19, 2004) <sup>1</sup>

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<sup>1</sup> Requirements of this Rule are addressed by Facility wide Umbrella Template SJV-UM-0-3



- District Rule 8071, Unpaved Vehicle/Equipment Traffic Areas (adopted November 15, 2001 ⇒ amended September 16, 2004)<sup>2</sup>
- 40 CFR Part 82, Subpart B and F, Stratospheric Ozone<sup>2</sup>

#### **B. Rules Removed**

None.

#### **C. Rules Added**

None.

#### **D. Rules Not Updated**

- District Rule 1080, Stack Monitoring (amended December 17, 1992)
- District Rule 1081, Source Sampling (amended December 16, 1993)
- District Rule 1100, Equipment Breakdown (Non-SIP replacement for Kern County Rule 111) (amended December 17, 1992)<sup>2</sup>
- District Rule 1160, Emission Statements (adopted November 18, 1992)<sup>2</sup>
- District Rule 2010, Permits Required (amended December 17, 1992)<sup>2</sup>
- District Rule 2031, Transfer of Permits (amended December 17, 1992)<sup>2</sup>
- District Rule 2040, Applications (amended December 17, 1992)<sup>2</sup>
- District Rule 2070, Standards for Granting Applications (amended December 17, 1992)<sup>2</sup>
- District Rule 2080, Conditional Approval (amended December 17, 1992)<sup>2</sup>
- District Rule 2520, Federally Mandated Operating Permits (amended June 21, 2001)<sup>2</sup>
- District Rule 4001, New Source Performance Standards (amended April 14, 1999)

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<sup>2</sup> Requirements of this Rule are addressed by Facility wide Umbrella Template SJV-UM-0-3

- District Rule 4002, National Emission Standards for Hazardous Air Pollutants (amended May 20, 2004)
- District Rule 4101, Visible Emissions (amended February 17, 2005)<sup>3</sup>
- District Rule 4201, Particulate Matter Concentration (amended December 17, 1992)
- District Rule 4301, Fuel Burning Equipment (amended December 17, 1992)
- District Rule 4801, Sulfur Compounds (Non-SIP replacement for Kern County Rule 108.1) (amended December 17, 1992)
- 40 CFR Part 60, Subpart A, Monitoring Requirements
- 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos (amended July 20, 2004)<sup>3</sup>
- 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. Rules Added

None.

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<sup>3</sup> Requirements of this Rule are addressed by Facility wide Umbrella Template SJV-UM-0-3

## Rules Not Updated

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

Compliance with the emission requirements of this rule is demonstrated with the permit conditions listed in the table below.

- Condition 41 on facility wide permit C-847-0-3 assures compliance with the requirements of 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 2201 - New and Modified Stationary Source Review Rule

District Rule 2201 has been amended since this facility's initial Title V permit was issued. This Title V permit renewal does not constitute a modification per section 3.24.1, defined as an action including at least one of the following items:

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

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

**B. District Rule 2520 - Federally Mandated Operating**

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

**C. District Rule 4603 – Surface Coating of Metal Parts and Products, Plastic Parts and Products, and Pleasure Crafts**

The purpose of this rule is to limit the emissions of volatile organic compounds (VOCs) from the coating of metal parts and products, large appliances parts or products, metal furniture, plastic parts and products, automotive/transportation and business machine plastic parts and products, and pleasure crafts, and from the organic solvent cleaning and storage and disposal of solvents and waste solvent materials associated with such coating. This rule also specifies the administrative and recordkeeping requirements and the test methods for determining the VOC content, the VOC emissions, the VOC capture efficiency, the acid content, the metallic or iridescent quality of coatings, and the VOC emissions from spray gun cleaning systems.

Sections 5.1 and 5.2 require that no person shall apply to any metal part or product any coating with a VOC content in excess of the following limits, expressed as grams of VOC per liter (or pounds per gallon) of coating applied, (less water and exempt compounds). The VOC limits for coatings as allowed by rule are presented in the following table:

<b>Rule 4603 Coating VOC Limits</b>		
<b>Coating Category</b>	<b>Allowable VOC content less water and exempt compounds, <b>baked</b> g/l (lb/gal)</b>	<b>Allowable VOC content less water and exempt compounds, <b>air-dried</b> g/l (lb/gal)</b>
<b>General Baked Coating</b>	<b>275 (2.3)</b>	<b>N/A</b>
<b>General Air-Dried Coating</b>	<b>N/A</b>	<b>340 (2.8)</b>
<b>Dip Coating of Steel Joists, air dried:</b>		
a. coatings with a viscosity, as applied, of more than 45.6 centistokes at 78°F or an average dry-film thickness of greater than 2.0 mil	<b>N/A</b>	<b>340 (2.8)</b>
b. coatings with a viscosity, as applied, of less than or equal to 45.6 centistokes at 78°F and an average dry-film thickness of less than or equal to 2.0 mils	<b>N/A</b>	<b>400 (3.32)</b>

<b>Specialty Coatings:</b>		
<b>Camouflage</b>	<b>360 (3.0)</b>	<b>420 (3.5)</b>
<b>Extreme Performance</b>	<b>420 (3.5)</b>	<b>420 (3.5)</b>
<b>Heat Resistant</b>	<b>360 (3.0)</b>	<b>420 (3.5)</b>
<b>High Gloss</b>	<b>360 (3.0)</b>	<b>420 (3.5)</b>
<b>High Performance Architectural</b>	<b>420 (3.5)</b>	<b>420 (3.5)</b>
<b>High Temperature</b>	<b>420 (3.5)</b>	<b>420 (3.5)</b>
<b>Metallic Coating</b>	<b>360 (3.0)</b>	<b>420 (3.5)</b>
<b>Pretreatment Coating</b>	<b>420 (3.5)</b>	<b>420 (3.5)</b>
<b>Touch Up and Repair Coating</b>	<b>360 (3.0)</b>	<b>420 (3.5)</b>
<b>Silicone Release</b>	<b>420 (3.5)</b>	<b>420 (3.5)</b>
<b>Solar Absorbant</b>	<b>360 (3.0)</b>	<b>420 (3.5)</b>
<b>Solid Film Lubricant</b>	<b>880 (7.3)</b>	<b>880 (7.3)</b>

- Condition 4 & 5 on the revised permit C-847-3-4 will ensure compliance with the requirements of section 5.1 and 5.2.

Section 5.4 states that in lieu of complying with the applicable VOC content limits of Section 5.1, or Table 1, an operator may control emissions from coating operations with an APCO-approved VOC emission control system that meets the requirements of Section 5.8. This section is not applicable as the facility will comply with VOC limits in Section 5.1 of this rule.

Section 5.9.2 states that an operator shall minimize VOC emissions by complying with work practice standards specified in Sections 5.9.3 through 5.9.6 as discussed below:

Section 5.9.3 requires to store all VOC-containing coatings, thinners, cleaning materials, and waste materials in closed non-absorbent and non-leaking containers. The containers shall remain closed at all times, except when specifically in use.

Section 5.9.4 requires to close the mixing vessels that contain VOC coatings and other materials, except when specifically in use.

Section 5.9.5 requires to minimize the spills of any VOC-containing materials and clean up spills immediately.

Section 5.9.6 requires to convey VOC-containing materials in closed containers or pipes.

- Condition 11 on the revised permit C-847-3-4 will ensure compliance with the requirements of section 5.9.2.

Section 5.10.1 states that an operator shall not use organic solvents for cleaning operations that exceed the VOC content limits specified in the following table.

<b>Rule 4603 Solvent VOC Limits</b>	
Cleaning Solvent Use	Allowable VOC content less water and exempt compounds g/l (lb/gal)
Product Cleaning During Manufacturing Process or Surface Preparation for Coating Application	25 (0.21)
Repair and Maintenance Cleaning	25 (0.21)
Cleaning of Coating Application Equipment	25 (0.21)

- Condition 6 on the revised permit C-847-3-4 will ensure compliance with the requirements of this section.

Section 5.11 requires that an owner or operator shall store or dispose of fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty.

- Condition 12 on the revised permit C-847-3-4 will ensure compliance with the requirements of this section.

Section 5.12 requires that a person shall not use or operate any coating application equipment on any metal parts and products, large appliances parts or products, metal furniture, plastic parts and products, automotive/transportation and business machine plastic parts and products, and pleasure crafts subject to the provisions of this rule unless one of the following methods is used:

- Electrostatic application;
- Electrodeposition;
- High-Volume, Low-Pressure (HVLP) spray;
- Flow coating;
- Roll coating;
- Dip coating;
- Brush coating; or
- Continuous coating.

In addition Section 5.12.3.1 requires that High-Volume, Low-Pressure (HVLP) spray equipment shall be operated in accordance with the manufacturer's recommendations. Section 5.6.3.2 requires that for HVLP spray guns manufactured prior to January 1, 1996, the end user shall demonstrate that the gun meets HVLP spray equipment standards. Satisfactory proof will be either in the form of manufacturer's published technical material or by a demonstration using a certified air pressure tip gauge, measuring the air atomizing pressure dynamically at the center of the air cap and at the air horns. Therefore, the following conditions will be listed on the permit to ensure compliance:

- Condition 9 & 10 on the revised permit C-847-3-4 will ensure compliance with the requirements of section 5.12.

Section 5.12 for prohibition of specification has a typographical error that should be section 5.13 in this rule. This rule states that no person shall solicit or require for use or specify the application of a coating subject to this rule if such use or application results in a violation of any of the provisions of this rule. The prohibition of this Section shall apply to all written or oral contracts under the terms of which any coating is to be applied to any metal part or product at any physical location within the District.

- Condition 23 on the revised permit C-847-3-4 will ensure compliance with the requirements of this section.

Section 6.1.1 requires that each container or accompanying data sheet of any coating shall display the maximum VOC content of the coating, as applied, and after any thinning recommended by the manufacturer. The VOC content shall be displayed as grams of VOC per liter of coating (less water and exempt compounds).

Section 6.1.2 requires that each container or accompanying data sheet display a statement of the manufacturer's recommendation regarding thinning of the coating. This requirement shall not apply to the thinning of coatings with water. Therefore, the following condition will be listed on the permit to ensure compliance:

- Condition 13 on the revised permit C-847-3-4 will ensure compliance with the requirements of section 6.1.1 & 6.1.2.

Section 6.1.3 states that manufacturers of any solvents subject to this rule shall indicate on the solvent container, or on a separate product data sheet or material safety data sheet, the name of the solvent, manufacturer's name, the VOC content, and density of the solvent, as supplied. The VOC content shall be expressed in units of gm/liter or lb/gallon.

- Condition 14 on the revised permit C-847-3-4 will ensure compliance with the requirements of this section.



Section 6.2.1 requires that any person subject to Section 5.0 shall comply with the following requirements: Maintain a current list of coatings and solvents in use which contains all of the coating data necessary to evaluate compliance, including the following information, as applicable:

- mix ratio of components used,
  - VOC content and specific chemical constituents of coatings as applied, and
  - VOC content and specific chemical constituents of solvents used for surface preparation and cleanup.
- Condition 20 on the revised permit C-847-3-4 will ensure compliance with the requirements of this section.

Section 6.2.2 requires that the permittee maintain daily records which include the following information:

- volume coating/solvent mix ratio,
- VOC content(lb/gal) and, for dip coating operations, viscosity (cSt) of coating,
- volume of each coating used (gallons), and
- quantity of cleanup solvent used (gallons).

Section 6.2.4 requires that consistent records may be kept in grams/liter and liters instead of pounds/gallon and gallons. An owner or operator of a stationary source subject to this rule shall maintain such records on a daily basis. An owner or operator that is subject to the exemption of Section 4.1 shall maintain usage records of non-compliant coatings on the days that such non-compliant coatings are used.

- Condition 21 on the revised permit C-847-3-4 will ensure compliance with the requirements of section 6.2.2 and 6.2.4.

Section 6.2.5 requires that the operator retain the records specified in Sections 6.2.1 through 6.2.4, as applicable, on site for a period of five years, make the records available on site during normal business hours to the APCO, ARB, or EPA and submit records to the APCO, ARB, or EPA upon request. The following conditions will be listed on the permit to ensure compliance:

- Condition 24 on the revised permit C-847-3-4 will ensure compliance with the requirements of this section.

Section 6.3 states the following test methods shall be used to determine compliance with the provisions of this rule and alternate test methods may be used provided they are approved by the APCO, ARB, and EPA and are discussed below:

Section 6.3.1 states VOC content of coatings and solvents shall be analyzed by EPA Method 24 and analysis of halogenated exempt compounds shall be analyzed by ARB Method 422.

- Condition 15 on the revised permit C-847-3-4 will ensure compliance with the requirements of this section.

**D. Rule 4684 – Polyester Resin Production (amended 9/17/09 - Not SIP Approved)**

The District Rule 4684 was amended on September 17, 2009 which is non- SIP approved version to add the requirements for fiberglass boat manufacturing operation. The proposed facility is a steel tank manufacturer and does not have any boat manufacturing process. Therefore, the requirements of non-SIP approved rule does not have any effect on this renewal.

The non-SIP approved rule is as stringent as SIP approved District Rule 4684 for tank coating operation and the requirements on draft permit C-847-3-4 satisfy all versions of this rule (SIP and Non-SIP) as discussed below:

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

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

Section 5.1.1 states that an operator of a polyester resin operation shall comply with one of the following process or control requirements:

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

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

All of the resins and gel coats used at this facility comply with the monomer content limits specified in this rule. Since monomers are VOC's, VOC limits automatically limit monomer content.

- Condition 7 on the revised permit C-847-3-4 will ensure compliance with the requirements of this section that satisfy all versions of this rule (SIP and Non-SIP).

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

- Condition 17 on the revised permit C-847-3-4 will ensure compliance with the requirements of this section that satisfy all versions of this rule (SIP and Non-SIP).

The requirements of Section 5.2 are for fiberglass boat manufacturing operations. Since this facility has no such operation, therefore this section is not applicable.

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

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

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

- Condition 6 on the revised permit C-847-3-4 will ensure compliance with the requirements of this section that satisfy all versions of this rule (SIP and Non-SIP).

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

- Condition 12 on the revised permit C-847-3-4 will ensure compliance with the requirements of this section that satisfy all versions of this rule (SIP and Non-SIP).

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

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

- 5) The operator shall retain the records specified in Sections 6.1.1 through 6.1.6, as applicable, on site for a period of five years, make the records available on site during normal business hours to the APCO, ARB, or EPA, and submit the records to the APCO, ARB, or EPA upon request
  - Condition 22 on the revised permit C-847-3-4 will ensure compliance with the requirements of this section that satisfy all versions of this rule (SIP and Non-SIP).

Section 6.2 states that the analysis of cleaning materials, polyester resin materials and control efficiency shall be determined by the following methods:

Section 6.2.3 states that the monomer content of uncatalyzed resin materials is to be determined using ASTM D2369-87 (Standard Test Method for Volatile Content of Coatings) or SCAQMD Test Method 312.

Section 6.2.4 states that the VOC content of cleaning materials shall be determined using EPA Method 24 (40 CFR Part 60, Appendix A).

- Condition 16 on the revised permit C-847-3-4 will ensure compliance with the requirements of this section that satisfy all versions of this rule (SIP and Non-SIP).

#### **E. 40 CFR Part 64, Compliance Assurance Monitoring**

This regulation requires Compliance Assurance Monitoring (CAM) for units that meet the following three criteria:

1. the unit must have 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 a major source threshold

<b>Pollutant</b>	<b>Major Source Threshold (lb/y)</b>
NO <sub>x</sub>	20,000
SO <sub>x</sub>	140,000
PM <sub>10</sub>	140,000
CO	200,000
VOC	20,000

**C-847-1-3:**

- 1) This unit has no emission limits for NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, CO, and VOC. Therefore, this unit is not subject to CAM for any pollutant.

**C-847-3-4:**

- 1) This unit contains emission limit for VOC emissions only.
- 2) This unit has no add-on control for VOC emissions. Therefore, this unit is not subject to CAM for VOC emissions or any other pollutant.

**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**

Model General Permit Template SJV-UM-0-3:

By submitting Model General Permit Template SJV-UM-0-3 qualification form, the applicant has requested that a permit shield be granted for all the applicable requirements identified by the template. Therefore, the permit shields as granted in Model General Permit Template is included as conditions 39 and 40 of the facility-wide requirements (C-847-0-3).

**B. Obsolete Permit Shields From Existing Permit Requirements**

Condition 18 on the current permit C-847-3-3 which is a permit shield for District Rule 4603 and 4684 has been removed. The permit shield is obsolete since it was granted based on the previous amended version of District Rule 4603 and 4684 which had been superseded by the current versions (both rules amended 9/17/09).

**X. PERMIT CONDITIONS**

See Attachment A - Renewed Title V Operating Permits.

**XI. ATTACHMENTS**

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

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# ATTACHMENT A

Draft Renewed Title V Operating Permits

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# San Joaquin Valley Air Pollution Control District

FACILITY: C-847-0-3

EXPIRATION DATE: 11/30/2010

## FACILITY-WIDE REQUIREMENTS

1. {4362} The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. {4363} The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. {4364} The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. {4365} Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. {4366} The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.9.1 and 9.13.1] Federally Enforceable Through Title V Permit
6. {4367} A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. {4368} Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. {4369} The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: MODERN WELDING  
Location: 4141 N BRAWLEY AVE, FRESNO, CA 93722  
C-847-0-3 : Feb 7 2011 3:28PM - BRARG

9. {4370} The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
10. {4371} The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. {4372} Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. {4373} If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
13. {4374} It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. {4375} The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. {4376} The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. {4377} The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. {4378} The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. {4379} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. {4380} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. {4381} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. {4382} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit

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

22. {4383} No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
23. {4384} No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. {4385} All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. {4386} The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. {4387} With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. {4388} If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. {4389} If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
29. {4390} Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8021 and 8011] Federally Enforceable Through Title V Permit
30. {4391} Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8031 and 8011] Federally Enforceable Through Title V Permit
31. {4392} An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8041 and 8011] Federally Enforceable Through Title V Permit
32. {4393} Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8051 and 8011] Federally Enforceable Through Title V Permit
33. {4394} Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8061 and Rule 8011] Federally Enforceable Through Title V Permit

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

34. {4395} Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rule 8071 and Rule 8011] Federally Enforceable Through Title V Permit
35. {4396} Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit
36. {4397} The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. {4398} The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. {4399} When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. {2323} Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), and Rule 111 (Kern, Tulare, Kings). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
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. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
42. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin May 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
43. Should the facility, as defined in 40 CFR section 68.3 become subject to part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in 40 CFR section 68.10. The facility shall certify compliance as part of the annual certification as required by 40 CFR part 70. [40 CFR 68] Federally Enforceable Through Title V Permit

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

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-847-1-3

**EXPIRATION DATE:** 11/30/2010

**EQUIPMENT DESCRIPTION:**

210 TOTAL HP SHOTBLAST BUILDING, 23' X 20' X 63', WITH AUGER, BUCKET ELEVATOR, SCREEN SEPARATOR, SHOTBLAST HOPPER AND QUINCY QSL-740-AC AIR COMPRESSOR SERVED BY A COLEMAN BAGHOUSE

## PERMIT UNIT REQUIREMENTS

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1. Shotblast doors shall be closed tightly during operation and dust collectors shall be inspected weekly while in operation for visible emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
2. All abrasive blasting must be conducted within a permanent building vented to Coleman baghouse. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Visible emissions from the abrasive blasting operation shall be less than 20% opacity when conducted inside a permanent building. [92000 CCR; District Rule 4101] Federally Enforceable Through Title V Permit
4. If excessive visible emissions are observed, appropriate action shall be taken, such as baghouse maintenance, cleaning, or replacement of bags as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
5. Dust collector filters shall be inspected at least quarterly when the unit is not operation for tears, scuffs, abrasions or holes which may interfere with the PM collection efficiency and shall be replaced as needed. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
6. 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 individual performing the inspection. [92000 CCR; District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
7. All abrasive blasting shall be conducted in accordance with California Code of Regulations Title 17, Subchapter 6, sections 92000 through 92540. [92000 CCR]

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-847-3-4

**EXPIRATION DATE:** 11/30/2010

**EQUIPMENT DESCRIPTION:**

ENCLOSED TANK COATING APPLICATION PROCESS; APPLYING FIBERGLASS RESIN WITH AIRLESS - NON-ATOMIZING RESIN APPLICATORS SERVED BY A QUINCY MODEL 350 AIR COMPRESSOR; COATING APPLIED WITH APPROVED RULE 4603 METHOD; CONTROLLED BY FABRIC FILTERS

## PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Daily emissions from the resin coating and painting operations shall not exceed 143.0 pounds of VOC per day. [District NSR Rule] Federally Enforceable Through Title V Permit
4. VOC content of any coatings as applied, excluding water and exempt compounds, used for any metal parts or product shall not exceed any of the following limits, except as allowed elsewhere in this permit: baked coating 275 g/l (2.3 lb/gal), air-dried coating: 340 g/l (2.8 lb/gal), air-dried dip coating of steel joists with coating viscosity, as applied, of more than 45.6 centistokes at 78 °F or an average dry-film thickness of greater than 2.0 millimeters: 340 g/l (2.8 lb/gal), air-dried dip coating of steel joists with coating viscosity, as applied, of less than or equal to 45.6 centistokes at 78 °F or an average dry-film thickness of less than or equal to 2.0 millimeters: 400 g/l (3.32 lb/gal). [District Rule 4603, 5.1] Federally Enforceable Through Title V Permit
5. VOC content of air-dried specialty coatings as applied, excluding water and exempt compounds, used for metal parts or product shall not exceed any of the following limits: camouflage 420 g/l (3.5 lb/gal), extreme performance: 420 g/l (3.5 lb/gal), heat resistant: 420 g/l (3.5 lb/gal), high gloss: 420 g/l (3.5 lb/gal), high performance architectural: 420 g/l (3.5 lb/gal), high temperature: 420 g/l (3.5 lb/gal), metallic coating: 420 g/l (3.5 lb/gal), pretreatment coating: 420 g/l (3.5 lb/gal), touch up and repair coating: 420 g/l (3.5 lb/gal), silicone release: 420 g/l (3.5 lb/gal), solar absorbent: 420 g/l (3.5 lb/gal), and solid film lubricant: 880 g/l (7.3 lb/gal). [District Rule 4603, 5.2] Federally Enforceable Through Title V Permit
6. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal); repair and maintenance cleaning 25 g/l (0.21 lb/gal); and cleaning of coating application equipment and cleaning of polyester resin application equipment: 25 g/l (0.21 lb/gal). [District Rules 4603, 5.10 and 4684, 5.3.1] Federally Enforceable Through Title V Permit
7. All resins used at this facility shall be of low VOC with the following monomer content: Low VOC resins, except for specialty resins and gel coats, containing no more than 35%; pigmented gel coats containing no more than 45%; and specialty resins and clear gel coats containing no more than 50% by weight monomer. [District Rule 4684, 5.1.1] Federally Enforceable Through Title V Permit
8. The VOC content of solvents emissions limit for cleaning of coating application equipment shall not apply to the cleaning of application equipment used to apply coatings on satellites and radiation effect coatings [District Rule 4603, 4.14] Federally Enforceable Through Title V Permit

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

9. Only HVLP, electrostatic, electrodeposition, flow, roll, dip, brush or continuous coating application equipment shall be used, and the coating application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4603, 5.12] Federally Enforceable Through Title V Permit
10. Permittee shall demonstrate that HVLP guns manufactured prior to 1/1/96 operate between 0.1 and 10 psig air atomizing pressure, by manufacturer's published technical material or by use of a certified air pressure tip gauge. [District Rule 4603, 5.12.3] Federally Enforceable Through Title V Permit
11. An operator shall store all VOC-containing coatings, thinners, cleaning materials, and waste material in closed non-absorbent and non-leaking containers, the containers shall remain closed at all time, except when specifically in use; close missing vessels that contain VOC coatings and other materials, except when specifically in use; minimize spills of any VOC-containing materials and clean up spills immediately; and convey VOC-containing materials in closed containers or pipes. [District Rule 4603, 5.9] Federally Enforceable Through Title V Permit
12. An owner or operator shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc, coatings, adhesives, catalysts, and thinners in self-closing, non-absorbent and non-leaking containers, keeping the containers closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4603, 5.11 and 4684, 5.4] Federally Enforceable Through Title V Permit
13. Each container or accompanying data sheet of any coating subject to this rule shall display; the maximum VOC content of the coating, as applied, and after any thinning as recommended by the manufacturer in grams of VOC per liter of coating (less water and exempt compounds) and a statement of the manufacturer's recommendation regarding thinning of the coating. [District Rule 4603, 6.1.1 & 6.1.2] Federally Enforceable Through Title V Permit
14. Manufacturers of any solvents subject to this rule shall indicate on the solvent container, or on a separate product data sheet or material safety data sheet, the name of the solvent, manufacturer's name, the VOC content (gm/liter or lb/gallon), and density of the solvent, as supplied. [District Rules 2520, 9.4.2 and 4603, 6.1.3] Federally Enforceable Through Title V Permit
15. VOC content of any coating shall be determined through the use of either product formulation data or analyzed by EPA Method 24 and analysis of halogenated exempt compounds shall be analysed by ARB Method 422. [District Rule 4603, 6.1 & 6.3.1] Federally Enforceable Through Title V Permit
16. Test methods used for the analysis of cleaning materials and polyester resin materials shall be as follows: the monomer content of uncatalyzed resin materials is to be determined using ASTM D2369-87 or SCAQMD Test Method 312, and the VOC content of cleaning materials shall be determined using EPA Method 24. [District Rules 2520, 9.3.2; 4603, 6.3.1 and 4684, 6.2] Federally Enforceable Through Title V Permit
17. Only air-less spray devices shall be used to apply resins that contain Volatile Organic Compounds. [District Rule 4684, 5.1.2] Federally Enforceable Through Title V Permit
18. All filters shall be maintained in good working order. [District Rule 4201] Federally Enforceable Through Title V Permit
19. All painting shall be conducted in an enclosed booth with filters in place, fan(s) operating, and doors closed. [District Rule 4201] Federally Enforceable Through Title V Permit
20. The permittee shall maintain a current list of coatings and solvents in use which contains all of the coating data necessary to evaluate compliance, including the following information: mix ratio of components used, VOC content and specific chemical constituents of coatings as applied, and VOC content and specific chemical constituents of solvents used for surface preparation and cleanup. [District Rule 4603, 6.2.1] Federally Enforceable Through Title V Permit
21. Permittee shall maintain daily records which include the following information: volume coating/solvent mix ratio; VOC content (lb/gal or grams/liter) and, for dip coating operations, viscosity (cSt) of coating; volume of each coating used (gallons); and quantity of cleanup solvent used (gallons). [District Rule 4603, 6.2.2] Federally Enforceable Through Title V Permit

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



22. Daily records shall be maintained and contain the following information: (a) Name, type, and quantity of all resins, gel coats, fillers, catalysts, solvents, and cleaning materials used in each operation; (b) The VOC content, in weight percent, of all polyester resin and gel coat, filler materials, including the weight percent of non-monomer VOC content of the resin and gel coat, used or stored at the stationary source; (c) The VOC content of all cleaning materials used and stored at the stationary source; and (d) The total daily amount of VOC's emitted from the use of all polyester resins, catalysts, solvents, and cleaning materials (in pounds). [District Rules 2520, 9.4 and 4684, 6.1] Federally Enforceable Through Title V Permit
23. No person shall solicit or require for use or specify the application of a coating subject to this rule, if such use or application results in a violation of any of the provisions of this rule. The prohibition shall apply to all written and oral contracts under the terms of which any coating is to be applied to any metal part or product at any physical location within the District. [District Rule 4603, 5.12] Federally Enforceable Through Title V Permit
24. Records shall be retained on-site for a minimum of five years, make the records available during normal business hours to the APCO, ARB, or EPA and submit the records to the APCO, ARB, or EPA upon request. [District Rule 4603, 6.2.5 and 4684, 6.1.7]

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

DRAFT



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# ATTACHMENT B

Previous Title V Operating Permits

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# San Joaquin Valley Air Pollution Control District

FACILITY: C-847-0-2

EXPIRATION DATE: 11/30/2010

## FACILITY-WIDE REQUIREMENTS

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1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. 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
5. 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
6. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. 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
9. 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: MODERN WELDING  
Location: 4141 N BRAWLEY AVE, FRESNO, CA 93722  
C-847-0-2: Feb 7 2011 3:29PM - BRARG

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

23. 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
24. 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
25. 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
26. 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. 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
28. 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
29. 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
30. 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
31. 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
32. 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
33. 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
34. 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
35. 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.

36. 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. 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. 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. 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
40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (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
41. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin May 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
42. Should the facility, as defined in 40 CFR section 68.3 become subject to part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in 40 CFR section 68.10. The facility shall certify compliance as part of the annual certification as required by 40 CFR part 70. [40 CFR 68] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-847-1-2

**EXPIRATION DATE:** 11/30/2010

**EQUIPMENT DESCRIPTION:**

210 TOTAL HP SHOTBLAST BUILDING, 23' X 20' X 63', WITH AUGER, BUCKET ELEVATOR, SCREEN SEPARATOR, SHOTBLAST HOPPER AND QUINCY QSL-740-AC AIR COMPRESSOR SERVED BY A COLEMAN BAGHOUSE

## PERMIT UNIT REQUIREMENTS

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1. Shotblast doors shall be closed tightly during operation and dust collectors shall be inspected weekly while in operation for visible emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
2. All abrasive blasting must be conducted within a permanent building vented to Coleman baghouse. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Visible emissions from the abrasive blasting operation shall be less than 20% opacity when conducted inside a permanent building. [92000 CCR; District Rule 4101] Federally Enforceable Through Title V Permit
4. If excessive visible emissions are observed, appropriate action shall be taken, such as baghouse maintenance, cleaning, or replacement of bags as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
5. Dust collector filters shall be inspected at least quarterly when the unit is not operation for tears, scuffs, abrasions or holes which may interfere with the PM collection efficiency and shall be replaced as needed. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
6. 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 individual performing the inspection. [92000 CCR; District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
7. All abrasive blasting shall be conducted in accordance with California Code of Regulations Title 17, Subchapter 6, sections 92000 through 92540. [92000 CCR]

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-847-3-3

**EXPIRATION DATE:** 11/30/2010

**EQUIPMENT DESCRIPTION:**

ENCLOSED TANK COATING APPLICATION PROCESS; APPLYING FIBERGLASS RESIN WITH AIRLESS - NON-ATOMIZING RESIN APPLICATORS SERVED BY A QUINCY MODEL 350 AIR COMPRESSOR; COATING APPLIED WITH APPROVED RULE 4603 METHOD; CONTROLLED BY FABRIC FILTERS

## PERMIT UNIT REQUIREMENTS

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1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Particulate matter emissions shall not exceed 0.1 gr/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Daily emissions from the resin coating and painting operations shall not exceed 143.0 pounds of VOC per day. [District NSR Rule] Federally Enforceable Through Title V Permit
5. VOC content of any coatings as applied, excluding water and exempt compounds, used for any metal parts or product shall not exceed any of the following limits, except as allowed elsewhere in this permit: baked coating 275 g/l (2.3 lb/gal), air-dried coating: 340 g/l (2.8 lb/gal), air-dried dip coating of steel joists with coating viscosity, as applied, of more than 45.6 centistokes at 78 °F or an average dry-film thickness of greater than 2.0 millimeters: 340 g/l (2.8 lb/gal), air-dried dip coating of steel joists with coating viscosity, as applied, of less than or equal to 45.6 centistokes at 78 °F or an average dry-film thickness of less than or equal to 2.0 millimeters: 400 g/l (3.32 lb/gal). [District Rule 4603, 5.1] Federally Enforceable Through Title V Permit
6. VOC content of air-dried specialty coatings as applied, excluding water and exempt compounds, used for metal parts or product shall not exceed any of the following limits: camouflage 420 g/l (3.5 lb/gal), extreme performance: 420 g/l (3.5 lb/gal), heat resistant: 420 g/l (3.5 lb/gal), high gloss: 420 g/l (3.5 lb/gal), high performance architectural: 420 g/l (3.5 lb/gal), high temperature: 420 g/l (3.5 lb/gal), metallic topcoat: 420 g/l (3.5 lb/gal), pretreatment wash primer: 420 g/l (3.5 lb/gal), silicone release: 420 g/l (3.5 lb/gal), solar absorbent: 420 g/l (3.5 lb/gal), and solid film lubricant: 880 g/l (7.3 lb/gal). [District Rule 4603, 5.2] Federally Enforceable Through Title V Permit
7. Only HVLP, electrostatic, electrodeposition, flow, roll, dip, brush or continuous coating application equipment shall be used, and the coating application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4603, 5.6] Federally Enforceable Through Title V Permit
8. Each container or accompanying data sheet of any coating shall display the maximum VOC content of the coating, as applied, and after any thinning recommended by the manufacturer. For determination of compliance and enforcement, the VOC content of any coating determined to exceed its applicable limit shall constitute a violation. [District Rule 4603, 6.1] Federally Enforceable Through Title V Permit
9. Permittee shall maintain daily records of the following: quantity and type of coatings and solvents used, mix ratios (by volume) of components added to each coating, volume of coatings applied, VOC content of each coating as applied, and VOC content of each solvent. [District Rules 2520, 9.4.2 and 4603, 6.2] Federally Enforceable Through Title V Permit

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

10. Permittee shall keep the following records for solvent cleaning activities: manufacturers product data sheet or MSDS of solvents used, VOC content of solvents in g/l or lb/gal, and the type of cleaning activity for which each solvent is used. [District Rules 2520, 9.4.2 and 4603, 6.2] Federally Enforceable Through Title V Permit
11. VOC content of any coating shall be determined through the use of either product formulation data or analyzed by EPA Method 24 and analysis of halogenated exempt compounds shall be analysed by ARB Method 432. [District Rule 4603, 6.1 & 6.3] Federally Enforceable Through Title V Permit
12. Only air-less spray devices shall be used to apply resins that contain Volatile Organic Compounds. [District Rule 4684, 5.1.2] Federally Enforceable Through Title V Permit
13. All resins used at this facility shall be of low VOC with the following monomer content: Low VOC resins, except for specialty resins and gel coats, containing no more than 35%; pigmented gel coats containing no more than 45%; and specialty resins and clear gel coats containing no more than 50% by weight monomer. [District Rule 4684, 5.1.1] Federally Enforceable Through Title V Permit
14. Daily records shall be maintained and contain the following information: (a) Name, type, and quantity of all resins, catalysts, solvents, and cleaning materials used in each operation; (b) The VOC content, in weight percent, of all polyester resin materials used or stored at the stationary source; (c) The VOC content of all cleaning materials used and stored at the stationary source; and (d) The total daily amount of VOC's emitted from the use of all polyester resins, catalysts, solvents, and cleaning materials (in pounds). [District Rules 2520, 9.4 and 4684, 6.1] Federally Enforceable Through Title V Permit
15. Test methods used for the analysis of cleaning materials and polyester resin materials shall be as follows: the monomer content of uncatalyzed resin materials is to be determined using ASTM D2369-87 or SCAQMD Test Method 312, and the VOC content of cleaning materials shall be determined using EPA Method 24. [District Rule 4684, 6.2; District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
16. All filters shall be maintained in good working order. [District Rule 4201] Federally Enforceable Through Title V Permit
17. All painting shall be conducted in an enclosed booth with filters in place, fan(s) operating, and doors closed. [District Rule 4201] Federally Enforceable Through Title V Permit
18. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following requirements: District Rules 4603 (5/20/93), 4661 (12/17/92), and 4684 (5/19/94); and Fresno County Rule 409. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
19. No person shall solicit or require for use or specify the application of a coating subject to this rule, if such use or application results in a violation of any of the provisions of this rule. The prohibition shall apply to all written and oral contracts under the terms of which any coating is to be applied to any metal part or product at any physical location within the District. [District Rule 4603, 5.7] Federally Enforceable Through Title V Permit
20. VOC content of solvents used shall not exceed any of the following limits except as allowed elsewhere on this permit: 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 coating application equipment and polyester resin application equipment: 550 g/l (4.6 lb/gal). [District Rules 4603, 5.5.3 and 4684, 5.4.3] Federally Enforceable Through Title V Permit
21. The VOC content of solvents emissions limit shall not apply to the 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; or cleaning of paper-based gaskets, and clutch assemblies where rubber is bonded to metal by means of an adhesive. [District Rules 4603, 5.5.4 and 4684, 5.4.4] Federally Enforceable Through Title V Permit
22. The VOC content of solvents emissions limit for cleaning of coating application equipment shall not apply to the cleaning of application equipment used to apply coatings on satellites and radiation effect coatings [District Rule 4603, 5.5.5] 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.



23. Cleaning activities that use solvents with a VOC content greater than 50 g/l (0.42 lb/gallon) shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rules 4603, 5.5.7 and 4684, 5.4.6] Federally Enforceable Through Title V Permit
24. Solvent used in conjunction with the coating operation shall not be atomized into the open air unless it is vented to a VOC emission control system that complies with Section 5.3.1. This provision shall not apply to the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers described in Section 5.5.7.2. [District Rule 4603, 5.5.8] Federally Enforceable Through Title V Permit
25. Permittee shall not use materials with a VOC content greater than 50 g/l (0.42 lb/gallon) for spray equipment clean-up unless an enclosed system, or equipment proven to be equally effective at controlling emissions, is used for cleaning. [District Rules 4603, 5.5.9 and 4684, 5.4.8] Federally Enforceable Through Title V Permit
26. All fresh or spent coatings, adhesives, catalysts, thinners and solvents shall be stored in closed containers. Solvent laden cloth or paper shall be stored and disposed in closed non-absorbent containers. [District Rule 4603, 5.5.10] Federally Enforceable Through Title V Permit
27. Solvent used in conjunction with the polyester resin operation shall not be atomized into the open air unless it is vented to a VOC emission control system. This provision shall not apply to the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers described elsewhere in this permit. [District Rule 4684, 5.4.7] Federally Enforceable Through Title V Permit
28. All uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners shall be stored in self-closing, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when disposing 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

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

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# ATTACHMENT C

Detailed Facility List

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**Detailed Facility Report**  
For Facility=847 and excluding Deleted Permits  
Sorted by Facility Name and Permit Number

<b>MODERN WELDING</b> 4141 N BRAWLEY AVE FRESNO, CA 93722	FAC # STATUS: TELEPHONE:	<b>C 847</b> <b>A</b> <b>2092759353</b>	TYPE: TOXIC ID:	<b>TitleV</b> <b>40157</b>	EXPIRE ON: AREA: INSP. DATE:	<b>11/30/2010</b> <b>4 /</b> <b>09/11</b>
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PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
C-847-1-2	210 HP SHOTBLAST BUILDING	3020-01 E	1	412.00	412.00	A	210 TOTAL HP SHOTBLAST BUILDING, 23' X 20' X 63', WITH AUGER, BUCKET ELEVATOR, SCREEN SEPARATOR, SHOTBLAST HOPPER AND QUINCY QSL-740-AC AIR COMPRESSOR SERVED BY A COLEMAN BAGHOUSE
C-847-3-3	10.0 HP TANK COATING PROCESS	3020-01 A	1	87.00	87.00	A	ENCLOSED TANK COATING APPLICATION PROCESS; APPLYING FIBERGLASS RESIN WITH AIRLESS - NON-ATOMIZING RESIN APPLICATORS SERVED BY A QUINCY MODEL 350 AIR COMPRESSOR; COATING APPLIED WITH APPROVED RULE 4603 METHOD; CONTROLLED BY FABRIC FILTERS

Number of Facilities Reported: 1