



JUL 11 2012

Michael Monschein
Monschein Industries, Inc.
6344 Roselle Avenue
Riverbank, CA 95367

**Re: Notice of Preliminary Decision - Federally Mandated Operating Permit
District Facility # N-3038
Project # N-1112324**

Dear Mr. Monschein:

Enclosed for your review and comment is the District's analysis of Monschein's application for the Federally Mandated Operating Permit for its wood working and wood coating operations at 6344 Roselle Avenue, Riverbank, 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. Rupi Gill, Permit Services Manager, at (209) 557-6400.

Sincerely,



David Warner
Director of Permit Services

DW:JK/st

Attachments

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

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JUL 11 2012

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

**Re: Notice of Preliminary Decision - Federally Mandated Operating Permit
District Facility # N-3038
Project # N-1112324**

Dear Mr. Rios:

Enclosed for your review and comment is the District's analysis of Monschein's application for the Federally Mandated Operating Permit for its wood working and wood coating operations at 6344 Roselle Avenue, Riverbank, 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. Rupi Gill, Permit Services Manager, at (209) 557-6400.

Sincerely,

David Warner
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JUL 11 2012

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

**Re: Notice of Preliminary Decision - Federally Mandated Operating Permit
District Facility # N-3038
Project # N-1112324**

Dear Mr. Tollstrup:

Enclosed for your review and comment is the District's analysis of Monschein's application for the Federally Mandated Operating Permit for its wood working and wood coating operations at 6344 Roselle Avenue, Riverbank, 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. Rupi Gill, Permit Services Manager, at (209) 557-6400.

Sincerely,

David Warner
Director of Permit Services

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Modesto Bee

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

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District solicits public comment on the proposed issuance of the Federally Mandated Operating permits to Monschein Industries, Inc. for its wood working and wood coating operations at 6344 Roselle Avenue, Riverbank, California.

The District's analysis of the legal and factual basis for this proposed action, project #N-1112324, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and the District office at the address below. There are no emission changes associated with this proposed action. This will be the public's only opportunity to comment on the specific conditions of the proposed Federally Mandated Operating initial permits. If requested by the public, the District will hold a public hearing regarding issuance of this initial permit. For additional information, please contact Mr. Rupi Gill, Permit Services Manager, at (209) 557-6400. Written comments on the proposed initial permit must be submitted within 30 days of the publication date of this notice to DAVID WARNER, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 4800 ENTERPRISE WAY, MODESTO, CALIFORNIA 95356-8718.

SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT

Proposed Initial TV Engineering Evaluation

**Monschein Industries, Inc.
N-3038**

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TITLE V APPLICATION REVIEW

Engineer: Jagmeet Kahlon
Date: July 10, 2012

Facility Number: N-3038
Facility Name: Monschein Industries, Inc.
Mailing Address: 6344 Roselle Ave
Riverbank, CA 95367

Contact Name: Michael Monschein
Title: Vice President
Phone: (209) 538-5116

Responsible Official: Michael Monschein
Title: Vice President

Project # : N-1112324
Deemed Complete: March 6, 2012

I. PROPOSAL

Monschein Industries, Inc. is proposing that an initial Title V permit be issued for its existing cabinet manufacturing facility in Riverbank, California. Monschein Industries, Inc. is applying for a Title V permit because its potential to emit for volatile organic compound (VOC) emissions is above the major source threshold.

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

II. FACILITY LOCATION

Monschein Industries, Inc. is located at 6344 Roselle Ave, Riverbank, California.

III. EQUIPMENT LISTING

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

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

IV. GENERAL PERMIT TEMPLATE USAGE

The applicant has requested to utilize model general umbrella template 0-3.

V. SCOPE OF EPA AND PUBLIC REVIEW

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

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

As discussed above, the applicant has requested to utilize general umbrella template 0-3. Permit conditions associated with the use of umbrella template 0-3 are not subject to further EPA and public review.

VI. APPLICABLE REQUIREMENTS ADDRESSED BY GENERAL PERMIT TEMPLATES

The applicant has proposed the use of general umbrella template 0-3. The following applicable requirements are addressed by general umbrella template 0-3.

District Rule 1100, Equipment Breakdown
(Amended December 17, 1992)

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

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

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

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

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

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

District Rule 2080, Conditional Approval
(Amended December 17, 1992)

District Rule 2520, Federally Mandated Operating Permits
(Amended June 21, 2001) Sections 5.2, 9.1.1, 9.4, 9.5, 9.7, 9.8, 9.9, 9.13.1,
9.13.2, 9.16, and 10.0

District Rule 4101, Visible Emissions
(Amended February 17, 2005)

District Rule 4601, Architectural Coatings
(Amended December 17, 2009)

District Rule 8021, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM₁₀) from Construction, Demolition, Excavation, and Extraction Activities
(Amended August 19, 2004)

District Rule 8031, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM₁₀) from Handling and Storage of Bulk Materials
(Amended August 19, 2004)

District Rule 8041, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM₁₀) from Carryout and Trackout
(Amended August 19, 2004)

District Rule 8051, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM₁₀) from Open Areas
(Amended August 19, 2004)

District Rule 8061, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM₁₀) from Paved and Unpaved Roads
(Amended August 19, 2004)

District Rule 8071, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM₁₀) from Unpaved Vehicle/Equipment Areas
(Amended September 16, 2004)

40 CFR Part 61, Subpart M, National Emission Standard for Asbestos

40 CFR Part 82, Subpart B and F, Stratospheric Ozone

VII. APPLICABLE REQUIREMENTS NOT ADDRESSED BY GENERAL PERMIT TEMPLATES

District Rule 1070, Inspections
(Amended December 17, 1992)

District Rule 1080, Stack Monitoring
(Amended December 17, 1992)

District Rule 1081, Source Sampling
(Amended December 16, 1993)

District Rule 2201, New and Modified Stationary Source Review Rule
(Amended April 21, 2011)

District Rule 2520, Federally Mandated Operating Permits
(Amended June 21, 2001) Sections not addressed by Umbrella Template

District Rule 4001, New Source Performance Standards
(Amended April 14, 1999)

District Rule 4002, National Emission Standards for Hazardous Air Pollutants
(Amended May 20, 2004)

40 CFR 63 Subpart JJ, National Emission Standards for Wood Furniture Manufacturing Operations
(Amended June 23, 2003)

40 CFR 63 Subpart DDDD, National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products
(Amended October 29, 2007)

40 CFR 63 Subpart QQQQ, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products

(Amended April 20, 2006)

40 CFR 63 Subpart QQQQQQ, National Emission Standards for Hazardous Air Pollutants for Wood Preserving Area Sources

(Amended March 26, 2008)

District Rule 4201, Particulate Matter Concentration

(Amended December 17, 1992)

District Rule 4202, Particulate Matter – Emission Rate

(Amended December 17, 1992)

District Rule 4606, Wood Products and Flat Wood Paneling Products Coating Operations

(Amended October 16, 2008)

40 CFR Part 64, Compliance Assurance Monitoring (CAM)

VIII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

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

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

District Rule 4102, Nuisance

(Amended December 17, 1992)

For this facility, condition 41 of the requirements for facility wide permit N-3038-0-2 is based on the rule listed above and is not Federally Enforceable through Title V permit.

IX. COMPLIANCE

A. Requirements Addressed by Model General Permit Templates

1. Facility Wide Requirements

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

B. Requirements Not Addressed by Model General Permit Templates

District Rule 1070, Inspections

This rule requires that the inspections shall be made by the enforcement agency for the purpose of obtaining information necessary to determine whether air pollution sources are in compliance with applicable rules and regulations. Further, the District has the authority to require recordkeeping, to make inspections and to conduct tests of air pollution sources.

Generally, Title V sources are inspected on a periodic basis at least once every 12 months to ensure compliance with the applicable rules and regulations. The permits to operate will include all necessary recordkeeping requirements. Thus, compliance is expected with this rule.

District Rule 1080, Stack Monitoring

This rule grants the APCO authority to request the installation, use, maintenance, and inspection of continuous monitoring equipment. This rule also specifies the performance standards for the equipment and administrative recordkeeping, reporting, and violation and equipment breakdown notification requirements.

This facility is not required to install continuous monitoring system for any emission unit at this site. Therefore, no further discussion is necessary.

District Rule 1081, Source Sampling

This rule ensures that any source operation which emits or may emit air contaminants provides adequate and safe facilities for use in sampling to

determine compliance. This rule also specifies methods and procedures for source testing, sample collection, and compliance determination.

Woodworking and wood coating operations are conducted at this site. The emissions from these operations are estimated using pre-established emission factors in the permits or using VOC and PM₁₀ (solids) content in the wood coatings. Therefore, source sampling is not required for the operations at this site, and no specific conditions on procedures for source testing, sample collection, and compliance determination will be included as part of this project.

District Rule 2201, New and Modified Stationary Source Review Rule

Permits to Operate (PTO) N-3038-2-5, '-4-2, '-7-7, '-8-0, and '-9-2 were subject to the District's NSR Rule (Rule 2201), at least once, upon application for the Authority to Construct for these units. In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTOs were addressed to define how NSR permit terms should be incorporated into the Title V permit.

The following table summarizes the PTO #, equipment description, NSR condition in the PTO, and NSR condition in the Title V.

PTO#	Equipment Description	NSR conditions in PTO	NSR conditions in Title V
N-3038-0	Facility-Wide Permit	1, 2	42, 43
N-3038-2	WOOD PRODUCTS COATING OPERATION WITH A BLEAKER BROTHERS MODEL #F241010 SPRAY BOOTH #2 AND A 1.8 MMBTU/HR NATURAL GAS-FIRED DRIQUIK CURING TUNNEL	4, 14 to 21	2 to 6
N-3038-4	WOOD PRODUCTS CONVEYORIZED COATING LINE CONSISTING OF A CATTINAIR ROTOCLEAN AUTOMATED SPRAYING MACHINE & TWO PERMIT EXEMPT NATURAL GAS-FIRED CATALYTIC INDUSTRIAL SYSTEMS CURING OVENS (<20.0 MMBTU/DAY HEAT INPUT)	4, 14 to 16	2 to 5

Continue...

PTO#	Equipment Description	NSR conditions in PTO	NSR conditions in Title V
N-3038-7	WOODWORKING OPERATION CONSISTING OF: 2 BAND SAWS; 2 CROSS CUT SAWS; 4 CHOP SAWS; 1 DENIBBING MACHINE; 1 DOVE TAILER; 7 DRILLING/BORING MACHINES; 2 EDGE BANDERS; 2 GRINDERS; 2 HINGE MACHINES; 1 JOINTER; 3 MITERS; 3 MOULDERS; 2 NOTCHERS; 1 CNC MACHINE; 1 PANEL SAW; 5 POP-UP SAWS; 2 RIP SAWS; 1 ROUTER; 6 SANDERS; 15 SHAPERS; AND 6 TABLE SAWS ALL VENTED TO A LMC MODEL #450-LP-12-T BAGHOUSE	3 to 14	2 to 13
N-3038-8	CONVEYORIZED WOOD PRODUCTS SANDING AND COATING LINE CONSISTING OF FOUR PROFISANDER BRUSH SANDING MACHINES, FOUR TYPE FV SISAL1 UPPER BRUSHING MACHINES, FOUR SUPERFICI AMERICA TWIN SPRAY MACHINES, FOUR CONTIVERT VERTICAL BELT TRAY MODEL #ETC15500 ELECTRIC DRYERS, FOUR 2-LAMP UV DRYERS, AND ASSOCIATED CONVEYING EQUIPMENT (PROFISANDER BRUSH SANDING MACHINES AND THE TYPE FVSISAL1 UPPER BRUSHING MACHINES ARE SERVED BY AN LMC MODEL #225FTD12 BAGHOUSE)	4 to 16; 22 to 26	3 to 11; 15 to 24; 26
N-3038-9	COUNTERTOP MANUFACTURING OPERATION SERVED BY A COMBINATION SAW/ROUTER AND A SANDER. BOTH UNITS ARE SERVED BY A 7,000 DSCFM DUSTEK M-2000 DUST COLLECTOR	3 to 11	1 to 6, 11

District Rule 2520, Federally Mandated Operating Permits

Except for the discussion below, the proposed use of a facility-wide template SJV-UM-0-3 covers the requirements of this Rule.

There are no federally applicable 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.

District Rule 4001, New Source Performance Standards

The Federal regulation 40 CFR Part 60 was searched to determine any applicable standards for wood working, wood coating and associated operations. This search did not result in a regulation that applies to this class and category of source. Therefore, no further discussion is necessary.

District Rule 4002, National Emission Standards for Hazardous Air Pollutants

The following subparts apply to a plant site that is major source as defined in 40 CFR part 63, subpart A, 63.2:

1. 40 CFR 63 Subpart JJ—National Emission Standards for Wood Furniture Manufacturing Operations
2. 40 CFR 63 Subpart DDDD, National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products
3. 40 CFR 63 Subpart QQQQ, National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products

Major source of HAP emissions is any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit, considering controls, any single HAP at a rate of 10 tons or more per year or any combination of HAP at a rate of 25 tons or more per year.

The combined HAP emissions from this site are less than 5 tons per year (4.9205 tons/yr refer to attachment E of this document). Therefore, this facility is not a major source of HAP emissions, and the above listed subparts do not apply.

40 CFR 63 Subpart QQQQQQ, National Emission Standards for Hazardous Air Pollutants for Wood Preserving Area Sources

Section 63.11433 defines *Wood preserving* means the pressure or thermal impregnation of chemicals into wood to provide effective long-term resistance to attack by fungi, bacteria, insects, and marine borers. The chemicals include chromium, arsenic, dioxins, or methylene chloride.

This facility does not operate wood preservative operation. Therefore, this subpart does not apply.

District Rule 4201, Particulate Matter Concentration

Section 3.0 prohibits discharge of dust, fumes, or total particulate matter into the atmosphere from any single source operation in excess of 0.1 grain per dry standard cubic foot.

N-3038-2:

PM₁₀ emissions: 1.21 lb/hr (19.3 lb/day (permit limit) ÷ 16 hr/day)

Fraction (lb-PM₁₀/lb-PM): 0.5, assumed

Exhaust airflow rate: 40,000 scfm (per project N1053852)

$$PM\left(\frac{\text{gr}}{\text{dscf}}\right) = \frac{\left(1.21 \frac{\text{lb-PM}_{10}}{\text{hr}}\right)\left(7,000 \frac{\text{gr-PM}}{\text{lb-PM}}\right)\left(\frac{\text{hr}}{60 \text{ min}}\right)}{\left(40,000 \frac{\text{ft}^3}{\text{min}}\right)\left(0.5 \frac{\text{lb-PM}_{10}}{\text{lb-PM}}\right)} = 0.007 \frac{\text{gr-PM}}{\text{dscf}}$$

N-3038-4:

PM₁₀ emissions: 0.1 lb/hr (1.6 lb/day (permit limit) ÷ 16 hr/day)

Fraction (lb-PM₁₀/lb-PM): 0.5, assumed

Exhaust airflow rate: 5,000 scfm (per project N1053852)

$$PM\left(\frac{\text{gr}}{\text{dscf}}\right) = \frac{\left(0.1 \frac{\text{lb-PM}_{10}}{\text{hr}}\right)\left(7,000 \frac{\text{gr-PM}}{\text{lb-PM}}\right)\left(\frac{\text{hr}}{60 \text{ min}}\right)}{\left(5,000 \frac{\text{ft}^3}{\text{min}}\right)\left(0.5 \frac{\text{lb-PM}_{10}}{\text{lb-PM}}\right)} = 0.005 \frac{\text{gr-PM}}{\text{dscf}}$$

N-3038-7:

Per ATC project N1110622,

$$PM\left(\frac{\text{gr}}{\text{dscf}}\right) = 0.00025 \frac{\text{gr-PM}}{\text{dscf}}$$

N-3038-8:

Per ATC project N1053852,

$$PM\left(\frac{\text{gr}}{\text{dscf}}\right) = 0.00005 \frac{\text{gr-PM}}{\text{dscf}}$$

N-3038-9:

Per project N1084166,

$$PM\left(\frac{\text{gr}}{\text{dscf}}\right) = 0.0004 \frac{\text{gr} - PM}{\text{dscf}}$$

Since the grain loading for the emission units is less than of the required 0.1 gr/dscf, compliance is expected with this rule. Further, to ensure continue compliance, each permit contains a permit condition that the particulate matter emissions shall not exceed 0.1 grains/dscf in concentration.

Rule 4202, Particulate Matter – Emission Rate

This rule limits the hourly particulate matter emissions from each Source Operation to the result of the equation that is applicable.

$$\begin{aligned} E_{\max} &= 3.59 P^{0.62}, \text{ where } P < 30 \text{ tons/hr} \\ E_{\max} &= 17.31 P^{0.16}, \text{ where } P > 30 \text{ tons/hr} \end{aligned}$$

E_{\max} = Maximum allowable emissions in lb/hr
P = Process weight in tons/hr

N-3038-2:

$$P = 0.214 \text{ tons/hr}^1$$

$$\begin{aligned} E_{\max} &= 3.59 (0.214)^{0.62} \\ &= 1.4 \text{ lb-PM/hr} \\ E_{\text{proposed}} &= 19.3 \text{ lb-PM/day} \div 16 \text{ hr/day} \\ &= 1.2 \text{ lb-PM/hr} \end{aligned}$$

N-3038-4:

$$P = 0.214 \text{ tons/hr}$$

$$\begin{aligned} E_{\max} &= 3.59 (0.214)^{0.62} \\ &= 1.4 \text{ lb-PM/hr} \\ E_{\text{proposed}} &= 1.6 \text{ lb-PM/day} \div 16 \text{ hr/day} \\ &= 0.1 \text{ lb-PM/hr} \end{aligned}$$

¹The total process weight is estimated to be 0.214 tons/hr. This process weight is determined using the information available in 2010 emissions inventory for permit unit N-3038-7. It is assumed that all materials (i.e., lumber, particle board, MDF, and plywood) processed under N-3038-7 will go through the equipment under permits N-3038-2 and '4. Lumber: (302,596 BF/yr) x (0.97 tons/1,000 BF)_{softwood, 3/8" basis} = 294 tons/yr; PB: (658,214 ft²/yr) x (0.289 tons/1,000 ft²)_{3/8" basis} = 190 tons/yr; Plywood: (165,697 ft²/yr) x (0.544 tons/1,000 ft²)_{softwood, 3/8" basis} = 90 tons/yr; Medium density fiberboard (MDF): (269,791 ft²/yr) x (1.172 tons/1,000 ft²)_{1/2" basis} = 316 tons/yr; Total materials = 890 tons/yr. The estimated operated hours are 2,080 in 2010. Thus, process weight is 0.428 tons/hr (890 tons/yr ÷ 2,080 hr/yr), or 0.214 tons/hr for each permit (N-3038-2 or '4).

N-3038-7:

Per project N1110622,

E_{max} = 3.22 lb-PM/hr;
E_{proposed} = 0.013 lb-PM/hr

N-3038-8:

Per project N1053852,

E_{max} = 0.83 lb-PM/hr;
E_{proposed} = 0.013 lb-PM/hr

N-3038-9:

Per project N1084166,

E_{max} = 0.9 lb-PM/hr
E_{proposed} = 0.02 lb-PM/hr

For each unit, the proposed emission rate is less the maximum allowable emission rate. Thus, compliance is expected with this rule.

District Rule 4606, Wood Products and Flat Wood Paneling Products Coating Operations

This rule is applicable to operations that apply coatings to wood products, including furniture, cabinets, flat wood paneling, and custom replica furniture. The rule shall also apply to the organic solvent cleaning, and the storage and disposal of all solvents and waste solvent materials associated with such coating operations.

This facility uses various stains, basecoats, and sealers in a wood cabinet manufacturing operation. Therefore, the wood coating operations under permits N-3038-2, '-4 and '-8 are subject to the requirements of this rule. Note that only applicable parts of the rule will be discussed in the following section.

Section 5.1 states that an operator shall not apply any coating to a wood product that has VOC content, as applied, that exceeds the applicable limits specified in Tables 1 or 2.

Table 1 VOC Content Limits for Wood Product Coating Operation		
Coating Category	grams of VOC/liter of coating, excluding water and exempt compounds, as applied	pounds of VOC/gallon of coating, excluding water and exempt compounds, as applied
Clear Topcoat	275	2.3
Filler	275	2.3
High-Solids Stain	240	2.0
Ink	500	4.2
Mold-Seal Coating	750	6.3
Multi-Colored Coating	275	2.3
Pigmented Coating	275	2.3
Sanding Sealer	275	2.3

Table 2 VOC Content Limits for Wood Product Coating Operation		
Coating Category	grams of VOC/liter of material, as applied	pounds of VOC/gallon of material, as applied
Low-Solids Stain	120	1.0
Stripper	350	2.9

The following conditions in permits N-3038-2, '-4 and '-8 will ensure compliance with this section:

- VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: clear topcoat 275 g/l (2.3 lb/gallon), filler 275 g/l (2.3 lb/gallon), high-solids stains 240 g/l (2.0 lb/gallon), ink 500 g/l (4.2 lb/gallon), mold-seal coating 750 g/l (6.3 lb/gallon), multi-colored coating 275 g/l (2.3 lb/gallon), pigmented coating 275 g/l (2.3 lb/gallon), sanding sealer 275 g/l (2.3 lb/gallon). [District Rule 4606]
- VOC content of materials for wood products, as applied, shall not exceed any of the following limits: low-solids stain 120 g/l (1.0 lb/gallon), stripper 350 g/l (2.9 lb/gallon). [District Rule 4606]

Section 5.5 states that an operator shall not apply coatings to wood products unless the coating is applied using one of the following methods:

1. Electrostatic application;
2. High-Volume, Low Pressure (HVLP) spray; provided
 - HVLP spray equipment shall be operated in accordance with the manufacturer's recommendations;
 - 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.
3. Hand roller
4. Flow coat
5. Roll Coater
6. Dip coat
7. Paint Brush
8. Detailing or touch-up guns; or
9. Such other coating application methods that demonstrate 65% transfer efficiency, as approved by the District
10. Use of an approved VOC emission control system

The following conditions in permits N-3038-2, '-4 and '-8 will ensure compliance with this section:

- Only high-volume low-pressure (HVLP) spray, electrostatic, brush, dip, flow, or roll coating application equipment, or other application equipment approved by the District in writing, shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4606]
- For HVLP spray guns manufactured prior to January 1, 1996, the permittee 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. [District Rule 4606]

Section 5.7 lists requirements for organic solvent cleaning operations and strippable booth coatings. An operator shall not use organic solvents for cleaning operations that exceed the content limits specified in Table 4 in

accordance with the corresponding effective date; and shall not use a strippable booth coating with VOC content in excess of 450 g/l (3.8 lb/gal) as applied, excluding water and exempt compounds.

Table 4 – VOC Limits for Organic Solvents Used in Cleaning Operations		
Type of Solvent Cleaning Operation	Effective November 15, 2003 through September 20, 2008	Effective on and after September 21, 2008
	VOC Content Limit Grams of VOC/liter of material (lb/gal)	VOC Content Limit Grams of VOC/liter of material (lb/gal)
A. Product Cleaning During Manufacturing Process or Surface Preparation for Coating Application	50 (0.42)	25 (0.21)
B. Repair and Maintenance Cleaning	50 (0.42)	25 (0.21)
C. Cleaning of Coating Application Equipment	550 (4.6)	25 (0.21)

The following conditions in permits N-3038-2, '-4 and '-8 will ensure compliance with this section:

- VOC content of strippable booth coating shall not exceed 450 g/l (3.8 lb/gallon) as applied, excluding water and exempt compounds. [District Rule 4606]
- VOC content of solvents used for product cleaning during manufacturing process or surface preparation for coating application, repair and maintenance cleaning, and cleaning of coating application equipment shall not exceed 25 g/l (0.21 lb/gal), unless such cleaning operations are carried out in District approved emission control system that meets the requirements of Section 5.4 of Rule 4606 (10/16/08). [District Rule 4606]

Section 5.8 list requirements for organic solvent disposal and storage. The following condition in permits N-3038-2, '-4 and '-8 will ensure compliance with this section:

- The 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. [District Rule 4606]

Section 6.1 lists requires record retention for a period five year, and make these records available on site during normal business hours to the APCO, ARB, or EPA, and submit them to the APCO, ARB, or EPA upon request. The following condition in permits N-3038-2, '-4 and '-8 will ensure compliance with this section:

- The operator shall retain all records on site for a period of five years, make the records available on site during normal business hours to the District, ARB or EPA and submit the records to the District, ARB, or EPA upon request. [District Rule 4606]

Section 6.2 lists recordkeeping requirements for coatings. The following conditions in permits N-3038-2, '-4 and '-8 will ensure compliance with this section:

- The operator shall maintain a current list of coatings, inks, adhesives, and solvents in use which provides all of the data necessary to evaluate compliance, including the following information, as applicable: a.) identify coatings, catalysts, reducers, inks, adhesives and solvents, b.) manufacturer's recommended mix ratio of components, c.) VOC content of coatings, as applied, d.) VOC content of solvents, e.) VOC content of inks, as applied, and f.) VOC content of adhesives, as applied. [District Rule 4606]
- The operator shall maintain records on a daily basis that provide the following information, as applicable: a.) coating and mix ratio of components in the coating used, b.) quantity of each coating applied, c.) identification of coating category, d.) identification and quantity of each ink used, e.) identification and quantity of each adhesive used, and f.) type and amount of solvent used for cleanup and surface preparation. [District Rule 4606]

Section 6.3 lists recordkeeping requirements for cleaning solvents. The following condition in permits N-3038-2, '-4 and '-8 will ensure compliance with this section:

- The operator shall maintain the following records, and have available at all times, a current list of solvents in use which provides all of the data necessary to evaluate compliance, including the following information as applicable: a.) keep a copy of the manufacturer's product data sheet or material safety data sheet of the solvents used

for organic solvent cleaning activities, and b.) maintain a current list of solvents that are being used for organic solvent cleaning activities including the following information: the name of the solvent and its manufacturer's name, the VOC content of the solvent expressed in grams/liter or lb/gallon, when the solvent is a mixture of different materials that are blended by the operator, the mix ratio of the batch shall be recorded and the VOC content of the batch shall be calculated and recorded in order to determine compliance with the specified limits of VOC content, as applied, and the type of cleaning activity for each solvent that is being used in accordance with the applicable cleaning category specified in Table 4 of Rule 4606 (10/16/08). [District Rule 4606]

Compliance is expected with this rule.

40 CFR Part 64, Compliance Assurance Monitoring (CAM)

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

1. The facility must be a major source for a specific pollutant
2. The unit must have an emission limit for the pollutant;
3. The unit must have add-on controls for the pollutant; these are devices such as flue gas recirculation (FGR), baghouses, and catalytic oxidizers; and
4. The unit must have a pre-control potential to emit of greater than the major source thresholds

Pollutant	Major Source Threshold (lb/year)
VOC	20,000
NO _x	20,000
CO	200,000
PM ₁₀	140,000
SO _x	140,000

N-3038-2-5

WOOD PRODUCTS COATING OPERATION WITH A BLEAKER
BROTHERS MODEL #F241010 SPRAY BOOTH #2 AND A 1.8 MMBTU/HR
NATURAL GAS-FIRED DRIQUIK CURING TUNNEL

This facility is a major source for VOC emissions. Therefore, CAM is being evaluated on a pollutant-by-pollutant basis.

Wood coating operation:

This operation is a source of VOC and PM₁₀ emissions.

There is no add-on control device to reduce VOC emissions. Therefore, CAM requirements would not apply to the VOC emissions.

This permit limits PM₁₀ emissions to 19.3 lb/day from the coating operation, which is conducted inside a spray booth. Spray booth control efficiency for particulate matter emissions is 66% per STAAPPA/ALAPCO Vol. 2, pg. 14-7, (5/30/91). Using this information, the pre-control PM₁₀ emissions would be:

$$\begin{aligned} PE_{\text{pre-control}} &= (19.3 \text{ lb-PM}_{10}/\text{day})(365 \text{ days/yr})/(1-0.66) \\ &= 20,719 \text{ lb-PM}_{10}/\text{yr} \end{aligned}$$

Since the pre-control PM₁₀ emissions are less than the major source threshold for PM₁₀, the coating operation did not trigger CAM for PM₁₀.

Natural gas combustion in curing tunnel - NO_x, SO_x, PM₁₀, CO and VOC:

This emission unit contains a limit on each pollutant. However, there is no add-on control device(s) installed to reduce them. Therefore, this unit is not subject to CAM.

N-3038-4-2

WOOD PRODUCTS CONVEYORIZED COATING LINE CONSISTING OF A CATTINAIR ROTOCLEAN AUTOMATED SPRAYING MACHINE & TWO PERMIT EXEMPT NATURAL GAS-FIRED CATALYTIC INDUSTRIAL SYSTEMS CURING OVENS (<20.0 MMBTU/DAY HEAT INPUT)

The wood coating operation is a source of VOC and PM₁₀ emissions.

There is no add-on control device to reduce VOC emissions. Therefore, CAM requirements do not apply to the VOC emissions.

This permit limits PM₁₀ emissions to 1.6 lb/day from the coating operation. The coating spray utilizes an enclosure with dry filters and water vortex capable of reducing at least 95% of the PM₁₀ emissions (see page 8 of the application review under project N-1053852). Using this information, the pre-control PM₁₀ emissions would be:

$$\begin{aligned} PE_{\text{pre-control}} &= (1.6 \text{ lb-PM}_{10}/\text{day})(365 \text{ days/yr})/(1-0.95) \\ &= 11,680 \text{ lb-PM}_{10}/\text{yr} \end{aligned}$$

Since the pre-control PM₁₀ emissions are less than the major source threshold for PM₁₀, the coating operation did not trigger CAM for PM₁₀.

N-3038-7-7

WOODWORKING OPERATION CONSISTING OF: 2 BAND SAWS; 2 CROSS CUT SAWS; 4 CHOP SAWS; 1 DENIBBING MACHINE; 1 DOVE TAILER; 7 DRILLING/BORING MACHINES; 2 EDGE BANDERS; 2 GRINDERS; 2 HINGE MACHINES; 1 JOINTER; 3 MITERS; 3 MOULDERS; 2 NOTCHERS; 1 CNC MACHINE; 1 PANEL SAW; 5 POP-UP SAWS; 2 RIP SAWS; 1 ROUTER; 6 SANDERS; 15 SHAPERS; AND 6 TABLE SAWS ALL VENTED TO A LMC MODEL #450-LP-12-T BAGHOUSE.

Wood working operation is a source of PM₁₀ emissions. This permit limits PM₁₀ emissions to 1.6 lb/day. The operation is served by a baghouse with a PM₁₀ control efficiency of 99% (see page 3 of the application review under project N1110622). Using this information, the pre-control PM₁₀ emissions would be:

$$\begin{aligned} PE_{\text{pre-control}} &= (1.6 \text{ lb-PM}_{10}/\text{day})(365 \text{ days/yr})/(1-0.99) \\ &= 58,400 \text{ lb-PM}_{10}/\text{yr} \end{aligned}$$

Since the pre-control PM₁₀ emissions are less than the major source threshold for PM₁₀, the coating operation did not trigger CAM for PM₁₀.

N-3038-8-0

CONVEYORIZED WOOD PRODUCTS SANDING AND COATING LINE CONSISTING OF FOUR PROFISANDER BRUSH SANDING MACHINES, FOUR TYPE FV SISAL1 UPPER BRUSHING MACHINES, FOUR SUPERFICI AMERICA TWIN SPRAY MACHINES, FOUR CONTIVERT VERTICAL BELT TRAY MODEL #ETC15500 ELECTRIC DRYERS, FOUR 2-LAMP UV DRYERS, AND ASSOCIATED CONVEYING EQUIPMENT (PROFISANDER BRUSH SANDING MACHINES AND THE TYPE FVSISAL1 UPPER BRUSHING MACHINES ARE SERVED BY AN LMC MODEL #225FTD12 BAGHOUSE)

Wood coating operation:

This operation is a source of VOC and PM₁₀ emissions.

There is no add-on control device to reduce VOC emissions. Therefore, CAM requirements would not apply to the VOC emissions.

This permit limits PM₁₀ emissions to 12.5 lb/day from the coating operation, which is conducted using Superfici twin spray machines. The machines' enclosure is required to use exhaust filters with a manufacturer guaranteed coating overspray PM₁₀ capture efficiency of at least 95%. Using this information, the pre-control PM₁₀ emissions would be:

$$\begin{aligned} PE_{\text{pre-control}} &= (12.5 \text{ lb-PM}_{10}/\text{day})(365 \text{ days/yr})/(1-0.95) \\ &= 91,250 \text{ lb-PM}_{10}/\text{yr} \end{aligned}$$

Since the pre-control PM₁₀ emissions are less than the major source threshold for PM₁₀, the coating operation did not trigger CAM for PM₁₀.

Wood product sanding and brushing operation:

This operation is a source of PM₁₀ emissions.

PM₁₀ emissions from the operation are limited to 0.2 lb/day. The operation is served by a baghouse capable of 99% control for PM₁₀ emissions. Using this information, the pre-control PM₁₀ emissions would be:

$$\begin{aligned} PE_{\text{pre-control}} &= (0.2 \text{ lb-PM}_{10}/\text{day})(365 \text{ days/yr})/(1-0.99) \\ &= 7,300 \text{ lb-PM}_{10}/\text{yr} \end{aligned}$$

Since the pre-control PM₁₀ emissions are less than the major source threshold for PM₁₀, the coating operation did not trigger CAM for PM₁₀.

N-3038-9-2

COUNTERTOP MANUFACTURING OPERATION SERVED BY A COMBINATION SAW/ROUTER, A CHOPSAW, A TABLE SAW, AND A VERTICAL PANEL SAW. ALL UNITS ARE SERVED BY A 7,000 DSCFM DUSTEK M-2000 DUST COLLECTOR

The potential PM₁₀ emissions from the operation are 0.6 lb/day. The operation is served by a dust collector, which is expected to reduce PM₁₀ emissions by at least 99%. Using this information, the pre-control PM₁₀ emissions would be:

$$\begin{aligned} PE_{\text{pre-control}} &= (0.6 \text{ lb-PM}_{10}/\text{day})(365 \text{ days/yr})/(1-0.99) \\ &= 21,900 \text{ lb-PM}_{10}/\text{yr} \end{aligned}$$

Since the pre-control PM₁₀ emissions are less than the major source threshold for PM₁₀, the coating operation did not trigger CAM for PM₁₀.

X. PERMIT SHIELD

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

A. Requirements Addressed by Model General Permit Templates

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

B. Requirements not Addressed by Model General Permit Templates

The model general permit template contains requirements related to the permit shields. Therefore, no further discussion is necessary.

XI. PERMIT CONDITIONS

See Attachment A – Draft Title V Operating Permit.

XII. ATTACHMENTS

- A. Draft Title V Operating Permit
- B. Detailed Facility List
- C. Exempt Equipment
- D. Existing SJVUAPCD Permits
- E. Hazardous Air Pollutant Calculations

Attachment A
Draft Title V Operating Permit

San Joaquin Valley Air Pollution Control District

FACILITY: N-3038-0-2

EXPIRATION DATE: 04/30/2013

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
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

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: MONSCHEIN INDUSTRIES INC
Location: 8344 ROSELLE AVE STE 101, RIVERBANK, CA 95967
N-3038-0-2 : Jul 10 2012 8:02AM - KAHLOJ

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

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FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

34. {4395} Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rule 8071 and Rule 8011] Federally Enforceable Through Title V Permit
35. {4396} Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit
36. {4397} The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. {4398} The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. {4399} When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. {4400} Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. {4401} Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
42. The combined VOC emissions from the stationary source shall not exceed 49,999 pounds in any rolling 12 consecutive month period. [District Rule 2201] Federally Enforceable Through Title V Permit
43. The permittee shall keep monthly records of the total VOC emissions from the entire stationary source. These records shall be used to determine compliance with the annual limit on a rolling basis. [District Rule 2201] Federally Enforceable Through Title V Permit
44. On {Month, Day, Year}, the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report are based upon this initial permit issuance date, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-3038-2-6

EXPIRATION DATE: 04/30/2013

EQUIPMENT DESCRIPTION:

WOOD PRODUCTS COATING OPERATION WITH A BLEAKER BROTHERS MODEL #F241010 SPRAY BOOTH #2 AND A 1.8 MMBTU/HR NATURAL GAS-FIRED DRIQUIK CURING TUNNEL

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. All painting shall be conducted in the booth with filters in place and fans operating. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Emissions due to the combustion of natural gas in the curing oven shall not exceed any of the following limits: 0.036 lb-NO_x/MMBtu, 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 0.084 lb-CO/MMBtu, and 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
4. VOC emissions due to coating usage shall not exceed 150.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. PM₁₀ emissions due to coating usage shall not exceed 19.3 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The permittee shall maintain daily records of the VOC emissions from this coating operation (in pounds). [District Rule 2201] Federally Enforceable Through Title V Permit
7. The permittee shall maintain daily records of the PM₁₀ emissions from this coating operation (in pounds). [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
8. VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: clear topcoat 275 g/l (2.3 lb/gallon), filler 275 g/l (2.3 lb/gallon), high-solids stains 240 g/l (2.0 lb/gallon), ink 500 g/l (4.2 lb/gallon), mold-seal coating 750 g/l (6.3 lb/gallon), multi-colored coating 275 g/l (2.3 lb/gallon), pigmented coating 275 g/l (2.3 lb/gallon), sanding sealer 275 g/l (2.3 lb/gallon). [District Rule 4606] Federally Enforceable Through Title V Permit
9. VOC content of materials for wood products, as applied, shall not exceed any of the following limits: low-solids stain 120 g/l (1.0 lb/gallon), stripper 350 g/l (2.9 lb/gallon). [District Rule 4606] Federally Enforceable Through Title V Permit
10. Only high-volume low-pressure (HVLP) spray, electrostatic, brush, dip, flow, or roll coating application equipment, or other application equipment approved by the District in writing, shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4606] Federally Enforceable Through Title V Permit
11. For HVLP spray guns manufactured prior to January 1, 1996, the permittee 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. [District Rule 4606] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

12. VOC content of strippable booth coating shall not exceed 450 g/l (3.8 lb/gallon) as applied, excluding water and exempt compounds. [District Rule 4606] Federally Enforceable Through Title V Permit
13. VOC content of solvents used for product cleaning during manufacturing process or surface preparation for coating application, repair and maintenance cleaning, and cleaning of coating application equipment shall not exceed 25 g/l (0.21 lb/gal), unless such cleaning operations are carried out in District approved emission control system that meets the requirements of Section 5.4 of Rule 4606 (10/16/08). [District Rule 4606] Federally Enforceable Through Title V Permit
14. The 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. [District Rule 4606] Federally Enforceable Through Title V Permit
15. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal), repair and maintenance cleaning: 50 g/l (0.42 lb/gal), and cleaning of coating application equipment: 550 g/l (4.6 lb/gal). [District Rule 4606] Federally Enforceable Through Title V Permit
16. The operator shall maintain a current list of coatings, inks, adhesives, and solvents in use which provides all of the data necessary to evaluate compliance, including the following information, as applicable: a.) identify coatings, catalysts, reducers, inks, adhesives and solvents, b.) manufacturer's recommended mix ratio of components, c.) VOC content of coatings, as applied, d.) VOC content of solvents, e.) VOC content of inks, as applied, and f.) VOC content of adhesives, as applied. [District Rule 4606] Federally Enforceable Through Title V Permit
17. The operator shall maintain records on a daily basis that provide the following information, as applicable: a.) coating and mix ratio of components in the coating used, b.) quantity of each coating applied, c.) identification of coating category, d.) identification and quantity of each ink used, e.) identification and quantity of each adhesive used, and f.) type and amount of solvent used for cleanup and surface preparation. [District Rule 4606] Federally Enforceable Through Title V Permit
18. The operator shall maintain the following records, and have available at all times, a current list of solvents in use which provides all of the data necessary to evaluate compliance, including the following information as applicable: a.) keep a copy of the manufacturer's product data sheet or material safety data sheet of the solvents used for organic solvent cleaning activities, and b.) maintain a current list of solvents that are being used for organic solvent cleaning activities including the following information: the name of the solvent and its manufacturer's name, the VOC content of the solvent expressed in grams/liter or lb/gallon, when the solvent is a mixture of different materials that are blended by the operator, the mix ratio of the batch shall be recorded and the VOC content of the batch shall be calculated and recorded in order to determine compliance with the specified limits of VOC content, as applied, and the type of cleaning activity for each solvent that is being used in accordance with the applicable cleaning category specified in Table 4 of Rule 4606 (10/16/08). [District Rule 4606] Federally Enforceable Through Title V Permit
19. The operator shall retain all records on site for a period of five years, make the records available on site during normal business hours to the District, ARB or EPA and submit the records to the District, ARB, or EPA upon request. [District Rule 4606] Federally Enforceable Through Title V Permit

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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-3038-4-3

EXPIRATION DATE: 04/30/2013

EQUIPMENT DESCRIPTION:

WOOD PRODUCTS CONVEYORIZED COATING LINE CONSISTING OF A CATTINAIR ROTOCLEAN AUTOMATED SPRAYING MACHINE & TWO PERMIT EXEMPT NATURAL GAS-FIRED CATALYTIC INDUSTRIAL SYSTEMS CURING OVENS (<20.0 MMBTU/DAY HEAT INPUT)

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. All painting shall be conducted in the booth with filters in place and fans operating. [District Rule 2201] Federally Enforceable Through Title V Permit
3. VOC emissions due to coating usage shall not exceed 150.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
4. PM10 emissions due to coating usage shall not exceed 1.6 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The permittee shall maintain daily records of the VOC emissions from this coating operation (in pounds). [District Rule 2201] Federally Enforceable Through Title V Permit
6. The permittee shall maintain daily records of the PM10 emissions from this coating operation (in pounds). [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
7. VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: clear topcoat 275 g/l (2.3 lb/gallon), filler 275 g/l (2.3 lb/gallon), high-solids stains 240 g/l (2.0 lb/gallon), ink 500 g/l (4.2 lb/gallon), mold-seal coating 750 g/l (6.3 lb/gallon), multi-colored coating 275 g/l (2.3 lb/gallon), pigmented coating 275 g/l (2.3 lb/gallon), sanding sealer 275 g/l (2.3 lb/gallon). [District Rule 4606] Federally Enforceable Through Title V Permit
8. VOC content of materials for wood products, as applied, shall not exceed any of the following limits: low-solids stain 120 g/l (1.0 lb/gallon), stripper 350 g/l (2.9 lb/gallon). [District Rule 4606] Federally Enforceable Through Title V Permit
9. Only high-volume low-pressure (HVLP) spray, electrostatic, brush, dip, flow, or roll coating application equipment, or other application equipment approved by the District in writing, shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4606] Federally Enforceable Through Title V Permit
10. For HVLP spray guns manufactured prior to January 1, 1996, the permittee 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. [District Rule 4606] Federally Enforceable Through Title V Permit
11. VOC content of strippable booth coating shall not exceed 450 g/l (3.8 lb/gallon) as applied, excluding water and exempt compounds. [District Rule 4606] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

12. VOC content of solvents used for product cleaning during manufacturing process or surface preparation for coating application, repair and maintenance cleaning, and cleaning of coating application equipment shall not exceed 25 g/l (0.21 lb/gal), unless such cleaning operations are carried out in District approved emission control system that meets the requirements of Section 5.4 of Rule 4606 (10/16/08). [District Rule 4606] Federally Enforceable Through Title V Permit
13. The 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. [District Rule 4606] Federally Enforceable Through Title V Permit
14. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal), repair and maintenance cleaning: 50 g/l (0.42 lb/gal), and cleaning of coating application equipment: 550 g/l (4.6 lb/gal). [District Rule 4606] Federally Enforceable Through Title V Permit
15. The operator shall maintain a current list of coatings, inks, adhesives, and solvents in use which provides all of the data necessary to evaluate compliance, including the following information, as applicable: a.) identify coatings, catalysts, reducers, inks, adhesives and solvents, b.) manufacturer's recommended mix ratio of components, c.) VOC content of coatings, as applied, d.) VOC content of solvents, e.) VOC content of inks, as applied, and f.) VOC content of adhesives, as applied. [District Rule 4606] Federally Enforceable Through Title V Permit
16. The operator shall maintain records on a daily basis that provide the following information, as applicable: a.) coating and mix ratio of components in the coating used, b.) quantity of each coating applied, c.) identification of coating category, d.) identification and quantity of each ink used, e.) identification and quantity of each adhesive used, and f.) type and amount of solvent used for cleanup and surface preparation. [District Rule 4606] Federally Enforceable Through Title V Permit
17. The operator shall maintain the following records, and have available at all times, a current list of solvents in use which provides all of the data necessary to evaluate compliance, including the following information as applicable: a.) keep a copy of the manufacturer's product data sheet or material safety data sheet of the solvents used for organic solvent cleaning activities, and b.) maintain a current list of solvents that are being used for organic solvent cleaning activities including the following information: the name of the solvent and its manufacturer's name, the VOC content of the solvent expressed in grams/liter or lb/gallon, when the solvent is a mixture of different materials that are blended by the operator, the mix ratio of the batch shall be recorded and the VOC content of the batch shall be calculated and recorded in order to determine compliance with the specified limits of VOC content, as applied, and the type of cleaning activity for each solvent that is being used in accordance with the applicable cleaning category specified in Table 4 of Rule 4606 (10/16/08). [District Rule 4606] Federally Enforceable Through Title V Permit
18. The operator shall retain all records on site for a period of five years, make the records available on site during normal business hours to the District, ARB or EPA and submit the records to the District, ARB, or EPA upon request. [District Rule 4606] Federally Enforceable Through Title V Permit

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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-3038-7-8

EXPIRATION DATE: 04/30/2013

EQUIPMENT DESCRIPTION:

WOODWORKING OPERATION CONSISTING OF; 5 CHOP SAWS, 5 DRILLING/BORING MACHINES, 13 SHAPERS, 5 POP UP SAWS, 3 MITERS, 6 SANDERS, 2 BAND SAWS, 3 TABLE SAWS, 1 JOINTER, 2 GRINDERS, 1 PANEL SAW, 2 CROSS CUT SAWS, 3 MOULDERS, 2 RIP SAWS, 2 EDGEBANDERS, 2 ROUTERS, 2 NOTCHERS, 1 DOVE TAILER, 2 HINGE MACHINES, AND 1 DENIBBER ALL VENTED TO AN LMC MODEL #450-LP-12-T BAGHOUSE.

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Visible emissions from the baghouse shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
3. All ducting from the woodworking equipment to the baghouse shall be properly maintained to prevent fugitive dust emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Replacement bags numbering at least 10% of the total number of bags in the baghouse shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The quantity of material collected by the baghouse shall not exceed 16,000 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The PM10 emissions shall not exceed 0.0001 pounds per pound of material collected. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Material removed from the baghouse shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The differential pressure gauge reading range shall be established per manufacturer's recommendation at time of start up inspection. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
13. A daily log of the quantity of material collected by the baghouse, in pounds, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520.9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

15. The dust collector bags shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
16. Records of all maintenance of the dust collector system, including all change outs of bags or filter media, shall be maintained. These records shall include identification of the equipment, date of inspection, any corrective action taken, and identification of the personnel performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
17. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-3038-8-1

EXPIRATION DATE: 04/30/2013

EQUIPMENT DESCRIPTION:

CONVEYORIZED WOOD PRODUCTS SANDING AND COATING LINE CONSISTING OF FOUR PROFISANDER BRUSH SANDING MACHINES, FOUR TYPE FV SISAL1 UPPER BRUSHING MACHINES, FOUR SUPERFICI AMERICA TWIN SPRAY MACHINES, FOUR CONTIVERT VERTICAL BELT TRAY MODEL #ETC15500 ELECTRIC DRYERS, FOUR 2-LAMP UV DRYERS, AND ASSOCIATED CONVEYING EQUIPMENT (PROFISANDER BRUSH SANDING MACHINES AND THE TYPE FVSISAL1 UPPER BRUSHING MACHINES ARE SERVED BY AN LMC MODEL #225FTD12 BAGHOUSE)

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. Visible emissions from the baghouse serving the sanding and brushing booths shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Material removed from the baghouse shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
8. PM10 emissions from the sanding and brushing booths shall not exceed 0.013 lb/lb of material collected by the baghouse. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The quantity of material collected by the baghouse shall not exceed 15 pounds during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
11. A daily log of the quantity of material collected by the baghouse, in pounds, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

13. The dust collector bags shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
14. Records of all maintenance of the dust collector system, including all change outs of bags or filter media, shall be maintained. These records shall include identification of the equipment, date of inspection, any corrective action taken, and identification of the personnel performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
15. All painting shall be conducted in the Superfici American twin spray coating machine enclosures with filters in place and fans operating. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The Superfici American twin spray coating machine enclosures shall only utilize exhaust filters with a manufacturer guaranteed coating overspray PM10 capture efficiency of at least 95%. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The Superfici American twin spray coating machines with airless spray guns and overspray reclaim system shall be maintained and operated with a minimum coating transfer efficiency of 90%. [District Rule 2201] Federally Enforceable Through Title V Permit
18. VOC emissions due to coating usage shall not exceed 99.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
19. PM10 emissions due to coating usage shall not exceed 12.5 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
20. The permittee shall maintain daily records of the VOC emissions from this coating operation (in pounds). [District Rule 2201] Federally Enforceable Through Title V Permit
21. The permittee shall maintain daily records of the PM10 emissions from this coating operation (in pounds). [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
22. VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: clear topcoat 275 g/l (2.3 lb/gallon), filler 275 g/l (2.3 lb/gallon), high-solids stains 240 g/l (2.0 lb/gallon), ink 500 g/l (4.2 lb/gallon), mold-seal coating 750 g/l (6.3 lb/gallon), multi-colored coating 275 g/l (2.3 lb/gallon), pigmented coating 275 g/l (2.3 lb/gallon), sanding sealer 275 g/l (2.3 lb/gallon). [District Rules 2201 and 4606] Federally Enforceable Through Title V Permit
23. VOC content of materials for wood products, as applied, shall not exceed any of the following limits: low-solids stain 120 g/l (1.0 lb/gallon), stripper 350 g/l (2.9 lb/gallon). [District Rules 2201 and 4606] Federally Enforceable Through Title V Permit
24. Only the Superfici American twin spray coating machines with airless spray guns, HVLP, electrostatic, brush, dip, flow, or roll coating application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4606] Federally Enforceable Through Title V Permit
25. For HVLP spray guns manufactured prior to January 1, 1996, the permittee 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. [District Rule 4606] Federally Enforceable Through Title V Permit
26. VOC content of strippable booth coating shall not exceed 450 g/l (3.8 lb/gallon) as applied, excluding water and exempt compounds. [District Rules 2201 and 4606] Federally Enforceable Through Title V Permit
27. VOC content of solvents used for product cleaning during manufacturing process or surface preparation for coating application, repair and maintenance cleaning, and cleaning of coating application equipment shall not exceed 25 g/l (0.21 lb/gal), unless such cleaning operations are carried out in District approved emission control system that meets the requirements of Section 5.4 of Rule 4606 (10/16/08). [District Rule 4606] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

28. The 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. [District Rule 4606] Federally Enforceable Through Title V Permit
29. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal), repair and maintenance cleaning: 50 g/l (0.42 lb/gal), and cleaning of coating application equipment: 550 g/l (4.6 lb/gal). [District Rule 4606] Federally Enforceable Through Title V Permit
30. The operator shall maintain a current list of coatings, inks, adhesives, and solvents in use which provides all of the data necessary to evaluate compliance, including the following information, as applicable: a.) identify coatings, catalysts, reducers, inks, adhesives and solvents, b.) manufacturer's recommended mix ratio of components, c.) VOC content of coatings, as applied, d.) VOC content of solvents, e.) VOC content of inks, as applied, and f.) VOC content of adhesives, as applied. [District Rule 4606] Federally Enforceable Through Title V Permit
31. The operator shall maintain records on a daily basis that provide the following information, as applicable: a.) coating and mix ratio of components in the coating used, b.) quantity of each coating applied, c.) identification of coating category, d.) identification and quantity of each ink used, e.) identification and quantity of each adhesive used, and f.) type and amount of solvent used for cleanup and surface preparation. [District Rule 4606] Federally Enforceable Through Title V Permit
32. The operator shall maintain the following records, and have available at all times, a current list of solvents in use which provides all of the data necessary to evaluate compliance, including the following information as applicable: a.) keep a copy of the manufacturer's product data sheet or material safety data sheet of the solvents used for organic solvent cleaning activities, and b.) maintain a current list of solvents that are being used for organic solvent cleaning activities including the following information: the name of the solvent and its manufacturer's name, the VOC content of the solvent expressed in grams/liter or lb/gallon, when the solvent is a mixture of different materials that are blended by the operator, the mix ratio of the batch shall be recorded and the VOC content of the batch shall be calculated and recorded in order to determine compliance with the specified limits of VOC content, as applied, and the type of cleaning activity for each solvent that is being used in accordance with the applicable cleaning category specified in Table 4 of Rule 4606 (10/16/08). [District Rule 4606] Federally Enforceable Through Title V Permit
33. The operator shall retain all records on site for a period of five years, make the records available on site during normal business hours to the District, ARB or EPA and submit the records to the District, ARB, or EPA upon request. [District Rule 4606] Federally Enforceable Through Title V Permit

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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-3038-9-1

EXPIRATION DATE: 04/30/2013

EQUIPMENT DESCRIPTION:

COUNTERTOP MANUFACTURING OPERATION SERVED BY A COMBINATION SAW/ROUTER, A CHOPSAW, A TABLE SAW, AND A VERTICAL PANEL SAW. ALL UNITS ARE SERVED BY A 7,000 DSCFM DUSTEK M-2000 DUST COLLECTOR

PERMIT UNIT REQUIREMENTS

1. Visible emissions from the dust collector serving the woodworking equipment shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The PM10 emissions shall not exceed 0.0004 gr/dscf of exhaust flow. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Replacement bags numbering at least 10% of the total number of bags in the largest dust collector using each type of bag shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The dust collector shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The dust collector cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. The dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
9. Records of all maintenance of the dust collector system, including all change outs of bags or filter media, shall be maintained. These records shall include identification of the equipment, date of inspection, any corrective action taken, and identification of the personnel performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
10. Visible emissions shall be inspected annually during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
11. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

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

Attachment B

Detailed Facility List

Detailed Facility Report
For Facility=3038
Sorted by Facility Name and Permit Number

MONSchein INDUSTRIES, INC. 6344 ROSELLE AVE STE 101 RIVERBANK, CA 95367	FACILITY STATUS TELEPHONE	N 3038 A 2098694514	TYPE TOXIC ID	TitleV	EXPIRE ON AREA INSPE DATE	04/30/2012 3 09/12
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PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
N-3038-1-2	1.8 MMBTU/HR BURNER	3020-02 E	1	412.00	412.00	D	WOOD PRODUCTS COATING OPERATION SERVED BY A BLEAKER BROTHERS MODEL F-24-10-10 SPRAY BOOTH AND A 1.8 MMBTU/HR NATURAL GAS FIRED DRIQUIK FLASH-OFF TUNNEL **DELETED BY KC DUE TO THE IMPLEMENTATION OF ATC PERMIT N-3038-4-0**
N-3038-2-5	Total Heat Input: 1,800 KBtu/hr	3020-02 E	1	412.00	412.00	A	WOOD PRODUCTS COATING OPERATION WITH A BLEAKER BROTHERS MODEL #F241010 SPRAY BOOTH #2 AND A 1.8 MMBTU/HR NATURAL GAS-FIRED DRIQUIK CURING TUNNEL
N-3038-3-1	1,800 KBTUS/HR	3020-02 E	1	412.00	412.00	D	WOOD PRODUCTS COATING OPERATION SERVED BY A SPRAYING SPRAY MODEL DI1S-8-10 SPRAY BOOTH AND A 1.8 MMBTU/HR NATURAL GAS FIRED HEATING TUNNEL **CANCELLED BY KC DUE TO THE IMPLEMENTATION OF ATC PERMIT N-3038-5-0**
N-3038-4-2	Total Electric Motors: 71.2 hp	3020-01 C	1	197.00	197.00	A	WOOD PRODUCTS CONVEYORIZED COATING LINE CONSISTING OF A CATTINAIR ROTOCLEAN AUTOMATED SPRAYING MACHINE & TWO PERMIT EXEMPT NATURAL GAS-FIRED CATALYTIC INDUSTRIAL SYSTEMS CURING OVENS (<20.0 MMBTU/DAY HEAT INPUT)
N-3038-5-3	Total Heat Input: 1,800 KBtu/hr	3020-02 E	1	412.00	412.00	D	WOOD PRODUCTS COATING OPERATION CONSISTING OF A BLEAKER BROTHERS SPRAY BOOTH #1 AND 1.8 MMBTU/HR NATURAL GAS DIRECT-FIRED DRIQUICK CURING TUNNEL
N-3038-6-2	Total Heat Input: 1,800 KBtu/hr	3020-02 E	1	412.00	412.00	D	WOOD PRODUCTS COATING OPERATION WITH A SPRAYING MODEL #DI15810 SPRAY BOOTH #3 WITH A 1.8 MMBTU/HR NATURAL GAS-FIRED HEATING TUNNEL
N-3038-7-7	1,210.5 electric motor hp	3020-01 G	1	815.00	815.00	A	WOODWORKING OPERATION CONSISTING OF: 2 BAND SAWS; 2 CROSS CUT SAWS; 4 CHOP SAWS; 1 DENIBBING MACHINE; 1 DOVE TAILER; 7 DRILLING/BORING MACHINES; 2 EDGE BANDERS; 2 GRINDERS; 2 HINGE MACHINES; 1 JOINTER; 3 MITERS; 3 MOULDERS; 2 NOTCHERS; 1 CNC MACHINE; 1 PANEL SAW; 5 POP-UP SAWS; 2 RIP SAWS; 1 ROUTER; 6 SANDERS; 15 SHAPERS; AND 6 TABLE SAWS ALL VENTED TO A LMC MODEL #450-LP-12-T BAGHOUSE. (REVISED 6/27/2011)
N-3038-8-0	Total Electric Motors: 385.7 hp	3020-01 E	1	412.00	412.00	A	CONVEYORIZED WOOD PRODUCTS SANDING AND COATING LINE CONSISTING OF FOUR PROFISANDER BRUSH SANDING MACHINES, FOUR TYPE FV SISAL1 UPPER BRUSHING MACHINES, FOUR SUPERFICI AMERICA TWIN SPRAY MACHINES, FOUR CONTIVERT VERTICAL BELT TRAY MODEL #ETC15500 ELECTRIC DRYERS, FOUR 2-LAMP UV DRYERS, AND ASSOCIATED CONVEYING EQUIPMENT (PROFISANDER BRUSH SANDING MACHINES AND THE TYPE FVSISAL1 UPPER BRUSHING MACHINES ARE SERVED BY AN LMC MODEL #225FTD12 BAGHOUSE)
N-3038-9-0	26 hp	3020-01 B	1	117.00	117.00	A	COUNTERTOP MANUFACTURING OPERATION SERVED BY A COMBINATION SAW/ROUTER AND A SANDER. BOTH UNITS ARE SERVED BY A 7,000 DSCFM DUSTEK M-2000 DUST COLLECTOR.

Number of Facilities Reported: 1

Attachment C

Exempt Equipment

The following exempt equipment was identified by the applicant on TVFORM-003, Insignificant Activities:

Exemption Category	Rule 2020 Citation	✓
Structure or incinerator associated with a structure designed as a dwelling for 4 families or less.	4.1	
Locomotives, airplanes, and watercraft used to transport passengers or freight.	4.4	
Natural gas or LPG-fired boilers or other indirect heat transfer units of 5 MMBtu/hr or less.	6.1.1	✓
Piston-type internal combustion engine with maximum continuous rating of 50 braking horsepower (bhp) or less.	6.1.2	
Gas turbine engines with maximum heat input rating of 3 MMBtu/hr or less.	6.1.3	
Space heating equipment other than boilers.	6.1.4	
Cooling towers with a circulation rate less than 10,000 gal/min.	6.2	
Use of less than 2 gal/day of graphic arts materials.	6.3	
Equipment at retail establishments used to prepare food for human consumption.	6.4.1	
Ovens at bakeries with total daily production less than 1,000 pounds and exempt by Section 5.1.1.	6.4.2	
Equipment used exclusively for extruding or compression molding of rubber or plastics, where no plasticizer or blowing agent is used.	6.5	
Containers used to store clean produced water.	6.6.1	
Containers ≤100 bbl used to store oil with specific gravity ≥ 0.8762.	6.6.2	
Containers ≤ 100 bbl installed prior to 6/1/89 used to store oil with specific gravity ≥ 0.8762.	6.6.3	
Containers with a capacity ≤ 250 gallons used to store organic material where the actual storage temperature <150 F.	6.6.4	
Containers used to store unheated organic material with an initial boiling point ≥ 302 F.	6.6.5	
Containers used to store fuel oils or non-air-blown asphalt with specific gravity ≥0.9042.	6.6.6	
Containers used to store petroleum distillates used as motor fuel with specific gravity ≥ 0.8251.	6.6.7	
Containers used to store refined lubricating oils.	6.6.8	
Unvented pressure vessels used exclusively to store liquefied gases or associated with exempt equipment.	6.6.9 or 6.13	
Portable tanks used exclusively to store produced fluids for ≤ six months.	6.6.10	

Continue...		
Exemption Category	Rule 2020 Citation	✓
Mobile transport tanks on vehicles for delivery of VOCs.	6.6.11	
Loading racks used for the transfer of less than 4,000 gal/day of unheated organic material with initial boiling point \geq 302 F or of fuel oil with specific gravity \geq 0.8251.	6.7.1.1	
Loading racks used for the transfer of asphalt, crude or residual oil stored in exempt tanks, or crude oil with specific gravity \geq 0.8762.	6.7.1.2	
Equipment used exclusively for the transfer of refined lubricating oil.	6.7.2	
Equipment used to apply architectural coatings.	6.8.1	
Unheated, non-conveyorized degreasers $<$ 10 ft ² open area; using solvents with initial boiling point \geq 248 F; and $<$ 25 gal/yr evaporative losses.	6.9	
Brazing, soldering, or welding equipment.	6.10	
Equipment used to compress natural gas.	6.11	
Fugitive emissions sources associated with exempt equipment.	6.12	
Pits and Ponds as defined in Rule 1020.	6.15	
On-site roadmix manufacturing and the application of roadmix as a road base material	6.17	
Emissions less than 2 lb/day from units not included above.	6.19	
Venting PUC quality natural gas for the sole purpose of pipeline and compressor repair and or maintenance	7.2	
Non-structural repairs & maintenance to permitted equipment.	7.3	
Detonation of explosives \leq 100 lb/day and 1,000 lb/day	7.4	

Attachment D
Existing SJVUAPCD Permits

San Joaquin Valley
Air Pollution Control District

FACILITY: N-3038-0-0

EXPIRATION DATE: 04/30/2013

FACILITY-WIDE REQUIREMENTS

1. The combined VOC emissions from the stationary source shall not exceed 49,999 pounds in any one calendar year. [District Rule 2201]
2. The permittee shall maintain a record of the cumulative annual VOC emissions from the stationary source. The cumulative total VOC emissions shall be updated monthly. [District Rule 2201]

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: MONSCHEIN INDUSTRIES INC
Location: 6344 ROSELLE AVE STE 101, RIVERBANK, CA 95367
N-3038-0-0 : Mar 6 2012 11:06AM - KAHLONJ

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-3038-2-5

EXPIRATION DATE: 04/30/2013

EQUIPMENT DESCRIPTION:

WOOD PRODUCTS COATING OPERATION WITH A BLEAKER BROTHERS MODEL #F241010 SPRAY BOOTH #2 AND A 1.8 MMBTU/HR NATURAL GAS-FIRED DRIQUIK CURING TUNNEL

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. All painting shall be conducted in the booth with filters in place and fans operating. [District Rule 2201]
5. VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: clear topcoat 275 g/l (2.3 lb/gallon), filler 275 g/l (2.3 lb/gallon), high-solids stains 240 g/l (2.0 lb/gallon), ink 500 g/l (4.2 lb/gallon), mold-seal coating 750 g/l (6.3 lb/gallon), multi-colored coating 275 g/l (2.3 lb/gallon), pigmented coating 275 g/l (2.3 lb/gallon), sanding sealer 275 g/l (2.3 lb/gallon). [District Rule 4606]
6. VOC content of materials for wood products, as applied, shall not exceed any of the following limits: low-solids stain 120 g/l (1.0 lb/gallon), stripper 350 g/l (2.9 lb/gallon). [District Rule 4606]
7. VOC content of strippable booth coating shall not exceed 450 g/l (3.8 lb/gallon) as applied, excluding water and exempt compounds. [District Rule 4606]
8. Only HVLP, electrostatic, brush, dip, flow, or roll coating application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4606]
9. Permittee shall demonstrate that HVLP guns manufactured prior to 1/1/96 operate between 0.1 and 10 psig air atomizing pressure, by manufacturer's published technical material or by use of a certified air pressure tip gauge. [District Rule 4606]
10. All fresh or spent coatings, adhesives, catalysts, thinners and solvents shall be stored in closed containers. Solvent laden cloth or paper shall be stored and disposed in closed non-absorbent containers. [District Rule 4606]
11. Cleaning activities that use solvents with a VOC content greater than 50 g/l (0.42 lb/gallon) shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4606]
12. Permittee shall not use materials with a VOC content greater than 50 g/l (0.42 lb/gallon) for spray equipment clean-up unless an enclosed system, or equipment proven to be equally effective at controlling emissions, is used for cleaning. [District Rule 4606]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

13. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal), repair and maintenance cleaning: 50 g/l (0.42 lb/gal), and cleaning of coating application equipment: 550 g/l (4.6 lb/gal). [District Rule 4606]
14. The NOx emissions due to the combustion of natural gas shall not exceed 0.036 lbs/MMBTU. [District Rule 2201]
15. The VOC emissions due to the combustion of natural gas shall not exceed 0.0055 lbs/MMBTU. [District Rule 2201]
16. The CO emissions due to the combustion of natural gas shall not exceed 0.084 lbs/MMBTU. [District Rule 2201]
17. The SOx emissions due to the combustion of natural gas shall not exceed 0.00285 lbs/MMBTU. [District NSR Rule]
18. The PM10 emissions due to the combustion of natural gas shall not exceed 0.0076 lbs/MMBTU. [District Rule 2201]
19. The VOC emissions due to coating usage shall not exceed 150.0 pounds in any one day. [District Rule 2201]
20. The PM10 emissions due to coating usage shall not exceed 19.3 pounds in any one day. [District Rule 2201]
21. The permittee shall maintain daily records of the VOC emissions from this coating operation (in pounds). [District Rule 2201]
22. Permittee shall maintain daily records of the following: quantity and type of coatings and solvents used, mix ratios (by volume) of components added to each coating, volume of coatings applied, VOC content of each coating as applied, and VOC content of each solvent or stripper. [District Rule 4606]
23. Permittee shall keep the following records for solvent cleaning activities: manufacturers product data sheet or MSDS of solvents used, VOC content of solvents in g/l or lb/gal, and the type of cleaning activity for which each solvent is used. [District Rule 4606]
24. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4606]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-3038-4-2

EXPIRATION DATE: 04/30/2013

EQUIPMENT DESCRIPTION:

WOOD PRODUCTS CONVEYORIZED COATING LINE CONSISTING OF A CATTINAIR ROTOCLEAN AUTOMATED SPRAYING MACHINE & TWO PERMIT EXEMPT NATURAL GAS-FIRED CATALYTIC INDUSTRIAL SYSTEMS CURING OVENS (<20.0 MMBTU/DAY HEAT INPUT)

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. All painting shall be conducted in the booth with filters in place and fans operating. [District Rule 2201]
5. VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: clear topcoat 275 g/l (2.3 lb/gallon), filler 275 g/l (2.3 lb/gallon), high-solids stains 240 g/l (2.0 lb/gallon), ink 500 g/l (4.2 lb/gallon), mold-seal coating 750 g/l (6.3 lb/gallon), multi-colored coating 275 g/l (2.3 lb/gallon), pigmented coating 275 g/l (2.3 lb/gallon), sanding sealer 275 g/l (2.3 lb/gallon). [District Rule 4606]
6. VOC content of materials for wood products, as applied, shall not exceed any of the following limits: low-solids stain 120 g/l (1.0 lb/gallon), stripper 350 g/l (2.9 lb/gallon). [District Rule 4606]
7. VOC content of strippable booth coating shall not exceed 450 g/l (3.8 lb/gallon) as applied, excluding water and exempt compounds. [District Rule 4606]
8. Only HVLP, electrostatic, brush, dip, flow, or roll coating application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4606]
9. Permittee shall demonstrate that HVLP guns manufactured prior to 1/1/96 operate between 0.1 and 10 psig air atomizing pressure, by manufacturer's published technical material or by use of a certified air pressure tip gauge. [District Rule 4606]
10. All fresh or spent coatings, adhesives, catalysts, thinners and solvents shall be stored in closed containers. Solvent laden cloth or paper shall be stored and disposed in closed non-absorbent containers. [District Rule 4606]
11. Cleaning activities that use solvents with a VOC content greater than 50 g/l (0.42 lb/gallon) shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4606]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

12. Permittee shall not use materials with a VOC content greater than 50 g/l (0.42 lb/gallon) for spray equipment clean-up unless an enclosed system, or equipment proven to be equally effective at controlling emissions, is used for cleaning. [District Rule 4606]
13. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal), repair and maintenance cleaning: 50 g/l (0.42 lb/gal), and cleaning of coating application equipment: 550 g/l (4.6 lb/gal). [District Rule 4606]
14. The VOC emissions due to coating usage shall not exceed 150.0 pounds in any one day. [District Rule 2201]
15. The PM10 emissions due to coating usage shall not exceed 1.6 pounds in any one day. [District Rule 2201]
16. The permittee shall maintain daily records of the VOC emissions from this coating operation (in pounds). [District Rule 2201]
17. Permittee shall maintain daily records of the following: quantity and type of coatings and solvents used, mix ratios (by volume) of components added to each coating, volume of coatings applied, VOC content of each coating as applied, and VOC content of each solvent or stripper. [District Rule 4606]
18. Permittee shall keep the following records for solvent cleaning activities: manufacturers product data sheet or MSDS of solvents used, VOC content of solvents in g/l or lb/gal, and the type of cleaning activity for which each solvent is used. [District Rule 4606]
19. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4606]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-3038-7-7

EXPIRATION DATE: 04/30/2013

EQUIPMENT DESCRIPTION:

WOODWORKING OPERATION CONSISTING OF: 2 BAND SAWS; 2 CROSS CUT SAWS; 4 CHOP SAWS; 1 DENIBBING MACHINE; 1 DOVE TAILER; 7 DRILLING/BORING MACHINES; 2 EDGE BANDERS; 2 GRINDERS; 2 HINGE MACHINES; 1 JOINTER; 3 MITERS; 3 MOULDERS; 2 NOTCHERS; 1 CNC MACHINE; 1 PANEL SAW; 5 POP-UP SAWS; 2 RIP SAWS; 1 ROUTER; 6 SANDERS; 15 SHAPERS; AND 6 TABLE SAWS ALL VENTED TO A LMC MODEL #450-LP-12-T BAGHOUSE. (REVISED 6/27/2011)

PERMIT UNIT REQUIREMENTS

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 grains/dscf in concentration. [District Rule 4201]
3. Visible emissions from the baghouse shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District NSR Rule]
4. All ducting from the woodworking equipment to the baghouse shall be properly maintained to prevent fugitive dust emissions. [District NSR Rule]
5. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]
6. Replacement bags numbering at least 10% of the total number of bags in the baghouse shall be maintained on the premises. [District Rule 2201]
7. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201]
8. The quantity of material collected by the baghouse shall not exceed 16,000 pounds in any one day. [District NSR Rule]
9. The PM10 emissions shall not exceed 0.0001 pounds per pound of material collected. [District NSR Rule]
10. Material removed from the baghouse shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule]
11. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201]
12. The differential pressure gauge reading range shall be established per manufacturer's recommendation at time of start up inspection. [District Rule 2201]
13. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201]
14. A daily log of the quantity of material collected by the baghouse, in pounds, shall be maintained. [District NSR Rule]
15. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4606]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-3038-8-0

EXPIRATION DATE: 04/30/2013

EQUIPMENT DESCRIPTION:

CONVEYORIZED WOOD PRODUCTS SANDING AND COATING LINE CONSISTING OF FOUR PROFISANDER BRUSH SANDING MACHINES, FOUR TYPE FV SISAL1 UPPER BRUSHING MACHINES, FOUR SUPERFICI AMERICA TWIN SPRAY MACHINES, FOUR CONTIVERT VERTICAL BELT TRAY MODEL #ETC15500 ELECTRIC DRYERS, FOUR 2-LAMP UV DRYERS, AND ASSOCIATED CONVEYING EQUIPMENT (PROFISANDER BRUSH SANDING MACHINES AND THE TYPE FVSISAL1 UPPER BRUSHING MACHINES ARE SERVED BY AN LMC MODEL #225FTD12 BAGHOUSE)

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]
5. Visible emissions from the baghouse serving the sanding and brushing booths shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201]
6. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201]
7. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District Rule 2201]
8. Material removed from the baghouse shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule]
9. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201]
10. All painting shall be conducted in the Superfici American twin spray coating machine enclosures with filters in place and fans operating. [District Rule 2201]
11. The Superfici American twin spray coating machine enclosures shall only utilize exhaust filters with a manufacturer guaranteed coating overspray PM10 capture efficiency of at least 95%. [District Rule 2201]
12. The Superfici American twin spray coating machines with airless spray guns and overspray reclaim system shall be maintained and operated with a minimum coating transfer efficiency of 90%. [District Rule 2201]
13. VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: clear topcoat 275 g/l (2.3 lb/gallon), filler 275 g/l (2.3 lb/gallon), high-solids stains 240 g/l (2.0 lb/gallon), ink 500 g/l (4.2 lb/gallon), mold-seal coating 750 g/l (6.3 lb/gallon), multi-colored coating 275 g/l (2.3 lb/gallon), pigmented coating 275 g/l (2.3 lb/gallon), sanding sealer 275 g/l (2.3 lb/gallon). [District Rules 2201 & 4606]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

14. VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: low-solids stain 120 g/l (1.0 lb/gallon), stripper 350 g/l (2.9 lb/gallon). [District Rules 2201 & 4606]
15. VOC content of strippable booth coating shall not exceed 450 g/l (3.8 lb/gallon) as applied, excluding water and exempt compounds. [District Rules 2201 & 4606]
16. Only the Superfici American twin spray coating machines with airless spray guns, HVLP, electrostatic, brush, dip, flow, or roll coating application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 & 4606]
17. Permittee shall demonstrate that HVLP guns manufactured prior to 1/1/96 operate between 0.1 and 10 psig air atomizing pressure, by manufacturer's published technical material or by use of a certified air pressure tip gauge. [District Rule 4606]
18. All fresh or spent coatings, adhesives, catalysts, thinners and solvents shall be stored in closed containers. Solvent laden cloth or paper shall be stored and disposed in closed non-absorbent containers. [District Rule 4606]
19. Cleaning activities that use solvents with a VOC content greater than 50 g/l (0.42 lb/gallon) shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4606]
20. Permittee shall not use materials with a VOC content greater than 50 g/l (0.42 lb/gallon) for spray equipment clean-up unless an enclosed system, or equipment proven to be equally effective at controlling emissions, is used for cleaning. [District Rule 4606]
21. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal), repair and maintenance cleaning: 50 g/l (0.42 lb/gal), and cleaning of coating application equipment: 550 g/l (4.6 lb/gal). [District Rule 4606]
22. The PM10 emissions from the sanding and brushing booths shall not exceed 0.013 lb/lb of material collected by the baghouse. [District Rule 2201]
23. The quantity of material collected by the baghouse shall not exceed 15 pounds during any one day. [District Rule 2201]
24. The VOC emissions due to coating usage shall not exceed 99.0 pounds in any one day. [District Rule 2201]
25. The PM10 emissions due to coating usage shall not exceed 12.5 pounds in any one day. [District Rule 2201]
26. The permittee shall maintain daily records of the VOC emissions from this coating operation (in pounds) and the quantity of material collected in the baghouse serving the sanding and brushing booths (in pounds). [District Rule 2201]
27. Permittee shall maintain daily records of the following: quantity and type of coatings and solvents used, mix ratios (by volume) of components added to each coating, volume of coatings applied, VOC content of each coating as applied, and VOC content of each solvent or stripper. [District Rule 4606]
28. Permittee shall keep the following records for solvent cleaning activities: manufacturers product data sheet or MSDS of solvents used, VOC content of solvents in g/l or lb/gal, and the type of cleaning activity for which each solvent is used. [District Rule 4606]
29. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4606]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-3038-9-2

EXPIRATION DATE: 04/30/2013

EQUIPMENT DESCRIPTION:

COUNTERTOP MANUFACTURING OPERATION SERVED BY A COMBINATION SAW/ROUTER, A CHOPSAW, A TABLE SAW, AND A VERTICAL PANEL SAW. ALL UNITS ARE SERVED BY A 7,000 DSCFM DUSTEK M-2000 DUST COLLECTOR

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. Visible emissions from the dust collector serving the woodworking equipment shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201]
4. The PM10 emissions shall not exceed 0.0004 gr/dscf of exhaust flow. [District Rule 2201]
5. Replacement bags numbering at least 10% of the total number of bags in the largest dust collector using each type of bag shall be maintained on the premises. [District Rule 2201]
6. The dust collector shall be maintained and operated according to manufacturer's specifications. [District Rule 2201]
7. The dust collector cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201]
8. Material removed from the dust collector shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
9. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
10. Records of all maintenance of the dust collector, including all change outs of filter media, shall be maintained. [District Rule 2201]
11. Records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 2201]

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

Attachment E

Hazardous Air Pollutant Calculations

HAP Emission Calculations
(N-3038-8)

Product	item #	¹ Year 2011 (gal/yr)	² Product % use	³ VOC (lb/gal)	⁴ Max Use (gal/yr)	³ VHAP (% by wt)	³ Density (lb/gal)	⁵ HAP (lb/yr)
W/B NY UV T/C mid-shee	975-F020-124	2,460.00	45.15%	0.15	108,756.00	0.6870%	8.69	6,493
W/B NY UV T/C 20	975-F020-202	-	-	0.13	-	0.6930%	8.72	-
⁶ S/B UV spray sealer	970-F020-219	2,989.00	54.85%	0.81	24,471.00	0.0000%	7.98	0
		5,449.00						6,493
Notes:								
1. Information provided by the applicant								
2. $\text{Product\%use} = \{\text{Product use 2011} \div \text{Total product use 2011 (gal/yr)}\} \times 100$								
3. VOC, VHAP and density for each product is taken from the product data sheets								
4. $\text{Max use (gal/yr)} = \{99 \text{ lb-VOC/day (limit)} + \text{VOC (lb/gal)}\} \times \text{Product\% use} \times 365 \text{ days/yr}$								
5. $\text{HAP (lb/yr)} = \text{Max use (gal/yr)} \times \text{Density (lb/gal)} \times \text{VHAP (\% by wt, lb-VHAP/100 lb-product)}$								
6. The 2011 use rates are cobminded for booth 1 and 2.								