



JUL 18 2012

Steven Campbell
Commercial Building Components, Inc.
1700 E. Louise Avenue
Lathrop, CA 95330-9795

**Re: Notice of Preliminary Decision - Federally Mandated Operating Permit
District Facility # N-222
Project # N-1110696**

Dear Mr. Campbell:

Enclosed for your review and comment is the District's analysis of Commercial Building Component's application for the Federally Mandated Operating Permit for its steel building manufacturing facility at 1700 E. Louise Avenue in Lathrop, 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

cc: Kai Chan, Permit Services Engineer

Attachments

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

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

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



JUL 18 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-222
Project # N-1110696**

Dear Mr. Rios:

Enclosed for your review and comment is the District's analysis of Commercial Building Component's application for the Federally Mandated Operating Permit for its steel building manufacturing facility at 1700 E. Louise Avenue in Lathrop, 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.

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JUL 18 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-222
Project # N-1110696**

Dear Mr. Tollstrup:

Enclosed for your review and comment is the District's analysis of Commercial Building Component's application for the Federally Mandated Operating Permit for its steel building manufacturing facility at 1700 E. Louise Avenue in Lathrop, 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.

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David Warner
Director of Permit Services

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Stockton Record

**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 Commercial Building Components, Inc. for its steel building manufacturing facility at 1700 E. Louise Avenue in Lathrop, California.

The District's analysis of the legal and factual basis for this proposed action, project #N-1110696, 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.

TITLE V APPLICATION REVIEW

Project #: 1110696
Deemed Complete: April 15, 2011

Engineer: Kai Chan
Date: June 28, 2012

Facility Number: N-222
Facility Name: Commercial Building Components, Inc.
Mailing Address: 1700 E. Louise Avenue
Lathrop, CA 95330-9795

Contact Name: Jason Johnston
Phone: (209) 983-0910

Responsible Official: Steven G. Campbell
Title: President
Phone: (209) 983-0910

I. PROPOSAL

Commercial Building Components, Inc. is proposing that an initial Title V permit be issued for its existing metal parts and products manufacturing facility in Lathrop, CA. Commercial Building Components, Inc. is applying for a Title V permit because it's 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

Commercial Building Components, Inc. is located at 1700 E. Louise Avenue, in Lathrop, CA.

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. This equipment is not exempt from facility-wide requirements.

IV. GENERAL PERMIT TEMPLATE USAGE

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

V. SCOPE OF EPA AND PUBLIC REVIEW

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

VI. APPLICABLE REQUIREMENTS ADDRESSED BY GENERAL PERMIT TEMPLATES

The applicant does not propose to use any model general permit templates. All applicable requirements are explicitly addressed in the permit outside of the general permit templates.

VII. APPLICABLE REQUIREMENTS NOT ADDRESSED BY GENERAL PERMIT TEMPLATES

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 August 18, 2011)

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

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

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

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

District Rule 4603, Surface Coating of Metal Parts and Products, Plastic Parts and Products, and Pleasure Crafts (Amended September 17, 2009)

District Rule 8011, General Fugitive Dust Requirements for Control of Fine Particulate Matter (PM₁₀) (Amended August 19, 2004)

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 August 19, 2004)

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

40 CFR Part 63, Subpart M, National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products

40 CFR Part 64, Compliance Assurance Monitoring (CAM)

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

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 39 of the requirements for facility wide permit N-222-0-1 is based on the rule listed above and is not Federally Enforceable through Title V.

IX. COMPLIANCE

A. Requirements Addressed by Model General Permit Templates

The applicant proposes not to utilize any model general permit templates. All applicable requirements are addressed in the following sections.

B. Requirements Not Addressed by Model General Permit Templates

1. District Rule 1100 – Equipment Breakdown

This rule defines a breakdown condition and the procedures to follow if one occurs. The corrective action, the issuance of an emergency variance, and the reporting requirements are also specified. Sections 6.0 and 7.0 prescribe breakdown procedures and reporting requirements. District Rule 1100 has been submitted to the EPA to replace San Joaquin County Rule 110 that is in the State Implementation Plan (SIP). District Rule 1100 is at least as stringent as the county SIP rule addressing breakdowns, as shown in the following comparison presented in Table 1:

Table 1: Comparison of District Rule 1100 to San Joaquin County Rule 110

REQUIREMENTS	District Rule 1100	San Joaquin County Rule 110
A breakdown occurrence must be reported as soon as reasonably possible but no later than 1 hour after detection.	X	X
A variance must be obtained if the occurrence will last longer than a production run or 24 hours, whichever is shorter (96 hours for CEM systems).	X	X
A report must be submitted to the APCO within 10 days of the correction of the breakdown occurrence which includes:	X	X
1) A statement that the breakdown condition has been corrected, together with the date of correction and proof of compliance.	X	X
2) A specific statement of the reason(s) or cause(s) for the occurrence sufficient to enable the APCO to determine whether the occurrence was a breakdown condition.	X	X
3) A description of the corrective measures undertaken and/or to be undertaken to avoid such an occurrence in the future.	X	X
4) Pictures of the equipment or controls which failed if available.	X	X

a. N-222-0-1: Facility-Wide Requirements

- Conditions 1. and 2. of the requirements for the proposed permit assures compliance with this rule.

2. District Rule 1160 – Emission Statements

The purpose of this rule is to provide the District with an accurate accounting of emissions from significant sources with which the District and California Air Resources Board (ARB) can compile an accurate inventory. Section 5.0 requires the owner or operator of any stationary source to provide the District with a written emissions statement showing actual emissions of reactive organic gases (ROGs) and nitrogen oxides (NOx) from that source. The District waives this requirement for sources emitting less than 25 tons per year of these pollutants if the District provides the ARB with an emissions inventory of sources emitting greater than 10 tons per year of NOx or ROGs based on the use of emission factors acceptable to the ARB.

a. N-222-0-1: Facility-Wide Requirements

- Condition 3. of the requirements for the proposed permit assures compliance with this rule.

3. District Rule 2010 – Permits Required

District Rule 2010 sections 3.0 and 4.0 requires any person building, modifying or replacing any operation that may cause the issuance of air contaminants to apply for an Authority to Construct (ATC) from the District in advance. The ATC will remain in effect until the Permit to Operate (PTO) is granted.

a. N-222-0-1: Facility-Wide Requirements

- Condition 4. of the requirements for the proposed permit assures compliance with this rule.

4. District Rule 2020 - Exemptions

District Rule 2020 lists equipment which is specifically exempt from obtaining permits and specifies recordkeeping requirements to verify such exemptions.

Current District Rule 2020 has been submitted to the EPA to replace SIP approved December 20, 2007 version of Rule 2020. The comparison of the current District Rule and the previous version, presented below in Table 2. indicate that the current District Rule is at least as stringent as the previous SIP approved version of this rule.

Table 2. Comparison of District Rule 2020 (12/20/07) to Rule 2020 (8/18/11)

REQUIREMENTS	District Rule 2020 (12/20/07)	District Rule 2020 (8/18/11)
An ATC or PTO is not required for listed exempt equipment.	X	X
Conditions are stated under which listed exempt equipment will require an ATC or PTO.	X	X
Record keeping is required to verify and maintain exemption, when the exemption is based on a maximum daily limitation.	X	X
A compliance schedule is stated for equipment which loses exemption from permitting, necessitating submission of a PTO application.	X	X

a. N-222-0-1: Facility-Wide Requirements

- Condition 4. of the requirements for the proposed permit assures compliance with this rule.

5. District Rule 2031 – Transfer of Permits

This rule requires a permit to operate or an authority to construct shall not be transferable, whether by operation of law or otherwise, from one location to another, from one piece of equipment to another, or from one person to another, unless a new application is filed with and approved by the APCO.

a. N-222-0-1: Facility-Wide Requirements

- Condition 6. of the requirements for the proposed permit assures compliance with this rule.

6. District Rule 2040 - Applications

The purpose of this rule is to explain the procedures for filing, denying, and appealing the denial of applications for an Authority to Construct or a Permit to Operate.

a. N-222-0-1: Facility-Wide Requirements

- Condition 7. of the requirements for the proposed permit assures compliance with this rule.

7. District Rule 2070 – Standards for Granting Applications

The purpose of this rule is to explain the standards by which an APCO may deny an application for an Authority to Construct or Permit to Operate. Any source operation must be constructed and operated in accordance with Rule 2201 (New and Modified Stationary Source Review Rule), Rule 4001 (New Source Performance Standards), and Rule 4002 (National Emissions Standards for Hazardous Air Pollutants), the Authority to Construct, and the Permit to Operate.

a. N-222-0-1: Facility-Wide Requirements

- Condition 5. of the requirements for the proposed permit assures compliance with this rule.

8. District Rule 2080 – Conditional Approval

The purpose of this rule is to grant authority to the APCO to issue or revise specific written conditions on an Authority to Construct or a Permit to Operate to assure compliance with air contaminant emission standards or limitations.

a. N-222-0-1: Facility-Wide Requirements

- Condition 5. of the requirements for the proposed permit assures compliance with this rule.

9. District Rule 2201 - New and Modified Stationary Source Review Rule (District NSR Rule)

a. N-222-1-2: OUTDOOR METAL PARTS AND PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN AND SPRAY GUN CLEANER (Existing Permit N-222-1-1)

Permit unit N-222-1-1 was subject to the District NSR Rule upon application for Authority to Construct (ATC). In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

- Conditions 3., 4., and 13. from the PTO has been included as conditions 1., 2., and 14. of the requirements for this proposed permit.

10. District Rule 2520 – Federally Mandated Operating Permits

The purpose of this rule include: providing an administrative mechanism for issuing, renewing, revising, and revoking operating permit sources of air contaminants in accordance with requirements of 40 CFR Part 70 and providing an administrative mechanism for incorporating New and Modified Source Review (NSR) requirements into a Part 70 permit.

Section 5.2 requires a permittee to submit applications for Title V permit renewal at least six months prior to permit expiration.

a. N-222-0-1: Facility-Wide Permit

- Condition 37. of the requirements for the proposed permit assures compliance with this section of the rule.

Section 9.0 of District Rule 2520 requires certain elements to be contained in each Title V permit:

Section 9.1.1 of District Rule 2520 requires all conditions on Title V permits specify a reference of the origin of an authority for each term or condition, and identify any difference in form as compared to the applicable requirements upon which the term or condition is based.

a. N-222-0-1: Facility-Wide Requirements

- Condition 38. of the requirements for the proposed permit assures compliance with this section of the rule.

Section 9.3 requires that periodic monitoring be performed if none is associated with a federally enforceable requirement to assure compliance.

a. N-222-1-2: OUTDOOR METAL PARTS AND PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN AND SPRAY GUN CLEANER

No additional conditions for periodic monitoring on the proposed permit were required.

Section 9.4 contains requirements to incorporate all applicable recordkeeping requirements into the Title V permit. This section also specifies records of any required monitoring and support data be kept for a period of five years.

a. N-222-0-1: Facility-Wide Permit

- Conditions 8. and 9. of the requirements for the proposed permit assures compliance with this section of the rule.

b. N-222-1-2: OUTDOOR METAL PARTS AND PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN AND SPRAY GUN CLEANER

No additional conditions for recordkeeping on the proposed permit were required.

Section 9.5 requires the submittal of monitoring reports at least every six months. Prompt reporting of deviations from permitting requirements, including those attributable to upset conditions is also required. The responsible official must certify all required reports.

a. N-222-0-1: Facility Wide Permit

- Conditions 10. and 11. of the requirements for the proposed permit assures compliance with this section of the rule.

b. N-222-1-2: OUTDOOR METAL PARTS AND PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN AND SPRAY GUN CLEANER

No additional conditions for monitoring reports on the proposed permit were required.

Section 9.7 states that the Title V permit must also contain a severability clause in case of a court challenge.

a. N-222-0-1: Facility-Wide Permit

- Condition 12. of the requirements for the proposed permit assures compliance with this section of the rule.

Section 9.8 contains requirements for provisions in the Title V permit stating 1) the permittee must comply with all permit conditions; 2) the permitted activity should not be reduced in order to comply with the permit conditions. Further, this reasoning shall not be used as a defense in an enforcement action, 3) the permit may be revoked, modified, reissued, or reopened for cause, 4) the Title V permit does not reflect any property rights, and 5) the permittee will furnish the District with any requested information to determine compliance with the conditions of the Title V permit.

a. N-222-0-1: Facility-Wide Permit

- Conditions 5. and 13. through 16. of the requirements for this proposed permit assures compliance with this section of the rule.

Section 9.9 requires the permit specify that the permittee pay annual permit fees and applicable fees from applicable District Regulation III Fee Rules.

a. N-222-0-1: Facility-Wide Permit

- Condition 17. of the requirements for the proposed permit assures compliance with the Title V permit fee requirements of this rule.

Section 9.13.1 requires any report or document submitted under a permit requirement or a request for information by the District or EPA contain a certification by a responsible official as to truth, accuracy, and completeness.

a. N-222-0-1: Facility-Wide Permit

- Condition 26. of the requirements for the proposed permit assures compliance with this section of the rule.

Section 9.13.2 contains inspection and entry requirements that allows an authorized representative of the District to enter a permittee's premises to inspect equipment, operations, work practices, permits on file, and to sample substances or monitor parameters for the purpose of assuring compliance with the permit requirements.

a. N-222-0-1: Facility-Wide Permit

- Conditions 18. through 21. of the requirements for the proposed permit assures compliance with this section of the rule.

Section 9.16 requires that the permittee submit certification of compliance with the terms and standards of Title V permits to the EPA and the District annually (or more frequently as required by the applicable requirement or the District).

a. N-222-0-1: Facility-Wide Permit

- Condition 36. of the requirements for the proposed permit assures compliance with this section of the rule.

Section 10.0 requires any application form, report, or compliance certification submitted pursuant to these regulations shall contain certification of truth, accuracy and completeness by a responsible official.

a. N-222-0-1: Facility Wide Permit

- Condition 26. of the requirements for the proposed permit assures compliance with this section of the rule.

Greenhouse Gas Requirements

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

11. District Rule 4101 – Visible Emissions

Section 5.0 prohibits the discharge of any air contaminant for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart; or is of such opacity as to obscure an observer's view to a degree equal to or greater than the smoke described in Section 5.1 of Rule 4101.

a. N-222-0-1: Facility-Wide Permit

- Condition 22. of the requirements for the proposed permit assures compliance with the requirements of this rule.

12. District Rule 4601 – Architectural Coatings

This rule limits the emissions of VOC's from architectural coatings. It requires limiting the application of any architectural coating to no more than what is listed in the Table of Standards (Section 5.0). This rule further specifies labeling requirements, coatings thinning recommendations and storage requirements.

a. Facility Wide Permit S-334-0-1

- Conditions 23., 24. and 25. of the requirements for this proposed permit assures compliance with the requirements of this rule.

The latest version of District Rule 4601 has not been SIP approved. Attachment E contains the streamlining of the SIP approved District Rule 4601 (10/31/01) to the current District Rule 4601 to show the current rule is as stringent if not more stringent than the SIP approved version.

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

The purpose of this rule is to limit the emissions of volatile organic compounds (VOC) from the coating of metal parts and products, large appliances parts or products, metal furniture, and plastic parts and products, automotive/transportation and business machine plastic parts and products, and pleasure crafts, and from the organic solvent cleaning and storage and disposal of solvents and waste solvents materials associated with such coating.

Section 5.1, General Coating Limits for Metal Parts and Products (Except for Large Appliance Parts or Products, and Metal Furniture Subject to Section 5.4.1):

Section 5.1 requires an operator to not apply any metal part or product coatings with VOC content in excess of the following limits, expressed as grams of VOC per liter or pounds per gallon of coating (less water and exempt compounds, as applied):

- Baked Coating: 275 grams/liter or 2.3 pounds/gallon
- Air-Dried Coating: 340 grams/liter or 2.8 pounds/gallon
- VOC Content Limit for Air-Dried Dip Coating of Steel Joists (SIC 3441): 340 grams/liter or 2.8 pounds/gallon for coatings with a viscosity (as applied) of more than 45.6 centistokes at 78°F or an average dry-film thickness of greater than 2.0 mils; 400 grams/liter or 3.32 pounds/gallon for coatings with a viscosity (as applied) of less than or equal to 45.6

centistokes at 78°F or an average dry-film thickness of less than or equal to 2.0 mils.

a. N-222-1-2: OUTDOOR METAL PARTS AND PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN AND SPRAY GUN CLEANER

- Condition 3. of the requirements for the proposed permit assures compliance with this section of the rule.

Section 5.2, Specialty Coating Limits for Metal Parts and Products (Except for Large Appliance Parts or Products, and Metal Furniture Subject to Section 5.4.1):

Section 5.2 requires an operator to not apply any metal part or product specialty coating with VOC content in excess of the limits in the Table below:

Specialty Coating Limits for Metal Parts and Products		
Coating Type	VOC Limit of Coating in Grams-VOC/Liter (or Pounds-VOC/Gallon), as applied (less water and exempt Compounds)	
	Baked	Air-Dried
Camouflage	360 (3.0)	420 (3.5)
Extreme Performance	360 (3.0)	420 (3.5)
Heat Resistant	360 (3.0)	420 (3.5)
Extreme High Gloss	360 (3.0)	420 (3.5)
High Performance Architectural	420 (3.5)	420 (3.5)
High Temperature	420 (3.5)	420 (3.5)
Metallic Coating	360 (3.0)	420 (3.5)
Pretreatment Coating	420 (3.5)	420 (3.5)
Touch Up and Repair Coating	360 (3.0)	420 (3.5)
Silicone Release	420 (3.5)	420 (3.5)
Solar Absorbant	360 (3.0)	420 (3.5)
Solid Film Lubricant	880 (7.3)	880 (7.3)

a. N-222-1-2: OUTDOOR METAL PARTS AND PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN AND SPRAY GUN CLEANER

- Conditions 4. and 5. of the requirements for the proposed permit assures compliance with this section of the rule.

Section 5.3 allows an operator to control VOC emissions from coating operations with an APCO-approved VOC emission control system that meets the requirements of Section 5.8 to use coatings with VOC content above the limits specified in Sections 5.1 or 5.2. Since the operator is not utilizing an APCO-approved VOC emission control system, this section of the rule is not applicable.

Section 5.4, Coating Limits for Large Appliance Parts or Products Coating Operation and Metal Furniture Coating Operation:

Section 5.4 specifies an operator of large appliance parts or products coating operations or metal furniture coating operations shall comply with the applicable requirements of Sections 5.4.1 or 5.4.2. Since this facility does not coat large appliance parts or products or metal furniture, this section of the rule is not applicable.

Section 5.5, Plastic Parts and Products Coating Operations (Except for Automotive/Transportation and Business Machine Plastic Parts and Products Coating Operations Subject to Section 5.6):

Section 5.5 specifies an operator of plastic parts and products coating operations, except for automotive/transportation and business machine plastic parts and products coating operations that are subject to Section 5.6, shall comply with the applicable requirements of Section 5.5.1 or Section 5.5.2. Since this facility does not coat plastic parts and products, this section of the rule is not applicable.

Section 5.6, Automotive/Transportation and Business Machine Plastic Parts and Products Coating Operations:

Section 5.6 specifies an operator of automotive/transportation and business machine plastic parts and products coating operations shall comply with the applicable requirements of Section 5.6.1 or Section 5.6.2. Since this facility does not perform any plastic parts and products coating operations, this section of the rule is not applicable.

Section 5.7, Pleasure Craft Coating Operations:

Section 5.7 specifies an operator of pleasure craft coating operations shall comply with the applicable requirements of Section 5.7.1 or Section 5.7.2. Since this facility does not perform any pleasure craft coating operations, this section of the rule is not applicable.

Section 5.8, VOC Emission Control System Requirements:

Section 5.8 specifies the requirements for the use of a VOC emission control system in lieu of complying with the applicable provisions of Sections 5.1, 5.2, 5.4, 5.5, 5.6, 5.7, 5.10, or 5.12. This facility does not utilize a VOC emission control system to comply with this rule; therefore, this section of the rule is not applicable.

Section 5.9, Work Practice Standards:

Section 5.9.2 requires an operator of metal parts and products coating operations, plastic parts and products coating operations, automotive/transportation and business machine plastic parts and products coating operations, and pleasure craft coating operations to comply with the following work practice stands: Store all VOC-containing coatings, thinners, cleaning materials, and waste materials in closed non-absorbent and non-leaking containers. The containers shall remain closed at all times, except when specifically in use (§5.9.3); Close mixing vessels that contain VOC coatings and other materials, except when specifically in use (§5.9.4); Minimize spills of any VOC-containing materials and clean up spills immediately (§5.9.5); Convey VOC-containing materials in closed containers or pipes (§5.9.6).

a. N-222-1-2: OUTDOOR METAL PARTS AND PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN AND SPRAY GUN CLEANER

- Condition 8. of the requirements for the proposed permit assures compliance with this section of the rule.

Section 5.10, Organic Solvent Cleaning Requirements:

Section 5.10.1 requires an operator to not use organic solvents for cleaning operations that exceed the VOC content limits specified in the following Table:

VOC Limits for Organic Solvents Used in Cleaning Operations	
Type of Solvent Cleaning Operation	VOC Content Limit Limits are expressed as grams of VOC/Liter (or pounds of VOC/gallon) of material
A. Product Cleaning During Manufacturing Process or Surface Preparation for Coating Application	25 (0.21)
B. Repair and Maintenance Cleaning	25 (0.21)
C. Cleaning of Coating Application Equipment	25 (0.21)

a. N-222-1-2: OUTDOOR METAL PARTS AND PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN AND SPRAY GUN CLEANER

- Condition 6. of the requirements for the proposed permit assures compliance with this section of the rule.

Section 5.10.2 requires an operator to perform all solvent cleaning operations with cleaning material having VOC content of 25 grams/Liter or less, unless such cleaning operations are performed within the control of an APCO-approved VOC emission control system that meets the requirements of Section 5.8. This facility does not utilize a VOC emission control system to comply with this rule; therefore, this section of the rule is not applicable.

Section 5.11, Solvent Storage and Disposal Requirements:

Section 5.11 requires the operator to 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 contents of the containers or when the container is empty.

a. N-222-1-2: OUTDOOR METAL PARTS AND PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN AND SPRAY GUN CLEANER

- Condition 9. of the requirements for the proposed permit assures compliance with this section of the rule.

Section 5.12, Application Equipment Requirements:

Section 5.12 requires the operator to apply coatings subject to the provisions of this rule with one of the following methods: Electrostatic Application; Electrodeposition; High-Volume Low-Pressure (HVLP) spray; Flow Coating; Roll Coating; Dip Coating; Brush coating; Continuous coating; or any other coating application method which is demonstrated to the APCO to be capable of achieving at least 65 percent transfer efficiency (prior written approval by the APCO is required). The transfer efficiency shall be determined in accordance with the test method pursuant to Section 6.3.8. In lieu of complying with the above coating application methods, an operator may control emissions from application equipment with a VOC emission control system that meets the requirements of Section 5.8.

a. N-222-1-2: OUTDOOR METAL PARTS AND PRODUCTS COATING
OPERATION WITH HVLP SPRAY GUN AND SPRAY GUN CLEANER

- Conditions 10. and 11. of the requirements for the proposed permit assures compliance with this section of the rule.

Section 6.1, Labeling Requirements:

Section 6.1.1 requires each container or accompanying data sheet of any coating subject to this rule to display the maximum VOC content of the coating (as applied) and after any thinning as recommended by the manufacturer. Section 6.1.2 requires each container or accompanying data sheet of any coating subject to this rule to display a statement of the manufacturer's recommendation regarding thinning of the coating. Section 6.1.3 requires manufacturers of any solvent subject to this rule to indicate on the solvent container, or on a separate product data sheet or material safety data sheet, the name of the solvent, manufacturer's name, the VOC content, and density of the solvent, as supplied.

a. N-222-1-2: OUTDOOR METAL PARTS AND PRODUCTS COATING
OPERATION WITH HVLP SPRAY GUN AND SPRAY GUN CLEANER

- Condition 7. of the requirements for the proposed permit assures compliance with this section of the rule.

Section 6.2, Recordkeeping:

Sections 6.2.1 and 6.2.2 require the operator to maintain coating and solvent records, which includes the following: (a). Current list of coatings and solvents in use which contains all of the coating data necessary to evaluate compliance, including the mix ratio of components used, VOC content and specific chemical constituents of coatings as applied, and VOC content and specific chemical constituents of solvents used for surface preparation and cleanup; (b). Daily records which include the volume coating/solvent mix ratio, VOC content (lb/gal or grams/liter) and for dip coating operations, viscosity (cSt) of coating, volume of each coating used (gallons), and quantity of cleanup solvent used (gallons).

Section 6.2.3 specifies the records required for an operator using a VOC emission control system pursuant to Section 5.8, which is not applicable to this facility.

Section 6.2.4 requires that consistent records may be kept in grams/liter and liters instead of pounds/gallon and gallons. An operator of a stationary source subject to this rule shall maintain such records on a daily basis.

Section 6.2.5 requires the operator to retain these records onsite for a period of five years, made available onsite during normal business hours to the APCO, ARB, or EPA and submitted upon request.

a. **N-222-1-2: OUTDOOR METAL PARTS AND PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN AND SPRAY GUN CLEANER**

- Conditions 12., 13., and 15. of the requirements for the proposed permit assures compliance with this section of the rule.

14. District Rule 8011, 8021, 8031, 8041, 8051, 8016, and 8071 – SJVUAPCD Regulation VIII – Fugitive Dust (PM₁₀)

These regulations contain requirements for the control of fugitive dust. These requirements apply to various sources, including construction, demolition, excavation, extraction, mining activities, outdoor storage piles, paved and unpaved roads.

a. **N-222-0-1: Facility-Wide Requirements**

- Conditions 29. through 34. of the requirements for the proposed permit assures compliance with these regulations.

15. 40 CFR 61, Subpart M – National Emission Standards for Asbestos

There are applicable requirements from the National Emissions Standards for Hazardous Air Pollutants that apply to all sources in general. These requirements pertain to asbestos removal and disposal from renovated or demolished structures.

a. **N-222-0-1: Facility-Wide Permit**

- Condition 35. of the requirements for the proposed permit assures compliance with this subpart.

16. 40 CFR 63, Subpart MMMM – National Emission Standards for Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products

This subpart establishes national emission limitations for hazardous air pollutants (HAP) emitted from miscellaneous metal parts and products surface coating located at a major source of HAP emissions. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations.

§63.881(b) states an owner or operator of an affected source is subject to this subpart if 250 gallons per year or more of coatings containing HAPs are used for the surface coating of miscellaneous metal parts and products, and that is a located at a major source of HAP emissions. A major source of HAP emissions is any stationary source that emits or has the potential to emit any single HAP at a rate of 10 tons or more per year or any combination of HAPs at a rate of 25 tons or more per year. Coatings that meet the definition of non-HAP coatings as defined in §63.3981 are not included in determining whether 250 gallons per year or more of coatings is used in the surface coating of miscellaneous metal parts and products.

§63.3981 defines non-HAP coating as a coating that contains no more than 0.1 percent by mass of any individual organic HAP that is an OSHA-defined carcinogen as specified in 29 CFR 1910.1200(d)(4) and no more than 1.0 percent by mass for any other individual HAP.

The facility only uses Contract Coatings Mfg. Inc. CBC Quick Dry Red Primer to surface coat their manufactured metal commercial building components. Based on the materials safety data sheet provided by the facility and enclosed in Attachment F, this coating does not contain any individual HAP greater than 1.0 percent by weight and is a non-HAP coating as defined in this subpart. Since this facility does not use any HAP coatings, this subpart is not applicable.

17. 40 CFR 64 - Compliance Assurance Monitoring (CAM)

40 CFR Part 64 requires Compliance Assurance Monitoring (CAM) for units that meet the following three criteria:

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

Major Source Thresholds		
Pollutant	lb/year	ton/year
NOx	20,000	10
SOx	140,000	70
PM10	140,000	70
CO	200,000	100
VOC	20,000	10

a. N-222-1-2: OUTDOOR METAL PARTS AND PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN AND SPRAY GUN CLEANER

This permit unit does not utilize an add-on control device for any pollutant. Therefore, this permit unit is not subject to CAM requirements for any pollutant.

19. 40 CFR 82, Subparts B and F – Stratospheric Ozone

There are applicable requirements from Title VI of the CAA (Stratospheric Ozone) that apply to all sources in general. These requirements pertain to air conditioners, chillers and refrigerators located at a Title V source and to disposal of air conditioners or maintenance/recharging/disposal of motor vehicle air conditioners (MVAC).

a. N-222-0-1: Facility-Wide Permit

- Conditions 27. and 28. of the requirements for the proposed permit assures compliance with this subpart.

X. PERMIT CONDITIONS

See Attachment A - Draft Initial Title V Operating Permits

XI ATTACHMENTS

- A. Draft Initial Title V Operating Permits
- B. Detailed Facility List
- C. Exempt Equipment
- D. Current SJVUAPCD Permit
- E. Stringency Comparison for District Rule 4601
- F. Material Safety Data Sheet for the Facility Applied Coating

Attachment A

Draft Initial Title V Operating Permits

San Joaquin Valley Air Pollution Control District

FACILITY: N-222-0-1

EXPIRATION DATE: 07/31/2014

FACILITY-WIDE REQUIREMENTS

1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1 and San Joaquin County Rule 110] Federally Enforceable Through Title V Permit
2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0 and San Joaquin County Rule 110] 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: COMMERCIAL BLDG COMPONENTS, INC
Location: 1700 E LOUISE AVE, LATHROP, CA 95330
N-222-0-1 : Jun 28 2012 1:55PM - CHANK

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
22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (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 San Joaquin County Rule 401] Federally Enforceable Through Title V Permit

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

23. {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
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

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

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. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
40. 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.

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-222-1-2

EXPIRATION DATE: 07/31/2014

EQUIPMENT DESCRIPTION:

OUTDOOR METAL PARTS AND PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN AND SPRAY GUN CLEANER

PERMIT UNIT REQUIREMENTS

1. Daily emissions from the coating operation shall not exceed either of the following limits: 150.0 lb-VOC/day or 67.4 lb-PM10/day. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The VOC emissions from the coating operation shall not exceed 49,999 pounds in any one rolling 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
3. VOC content of any coatings as applied, excluding water and exempt compounds, used for any metal parts or product shall not exceed any of the following limits, except as allowed elsewhere in this permit: baked coating 275 g/l (2.3 lb/gal), air-dried coating: 340 g/l (2.8 lb/gal), air-dried dip coating of steel joists with coating viscosity, as applied, of more than 45.6 centistokes at 78 degrees F or an average dry-film thickness of greater than 2.0 millimeters: 340 g/l (2.8 lb/gal), air-dried dip coating of steel joists with coating viscosity, as applied, of less than or equal to 45.6 centistokes at 78 degrees F or an average dry-film thickness of less than or equal to 2.0 millimeters: 400 g/l (3.32 lb/gal). [District Rule 4603] Federally Enforceable Through Title V Permit
4. VOC content of baked specialty coatings as applied, excluding water and exempt compounds, used for metal parts or product shall not exceed any of the following limits: camouflage 360 g/l (3.0 lb/gal), extreme performance: 360 g/l (3.0 lb/gal), heat resistant: 360 g/l (3.0 lb/gal), extreme high gloss: 360 g/l (3.0 lb/gal), high performance architectural: 420 g/l (3.5 lb/gal), high temperature: 420 g/l (3.5 lb/gal), metallic coating: 360 g/l (3.0 lb/gal), pretreatment coating: 420 g/l (3.5 lb/gal), touch up and repair coating: 360 g/l (3.0 lb/gal), silicone release: 420 g/l (3.5 lb/gal), solar absorbent: 360 g/l (3.0 lb/gal), and solid film lubricant: 880 g/l (7.3 lb/gal) [District Rule 4603] Federally Enforceable Through Title V Permit
5. VOC content of air-dried specialty coatings as applied, excluding water and exempt compounds, used for metal parts or product shall not exceed any of the following limits: camouflage 420 g/l (3.5 lb/gal), extreme performance: 420 g/l (3.5 lb/gal), heat resistant: 420 g/l (3.5 lb/gal), extreme high gloss: 420 g/l (3.5 lb/gal), high performance architectural: 420 g/l (3.5 lb/gal), high temperature: 420 g/l (3.5 lb/gal), metallic coating: 420 g/l (3.5 lb/gal), pretreatment coating: 420 g/l (3.5 lb/gal), touch up and repair coating: 420 g/l (3.5 lb/gal), silicone release: 420 g/l (3.5 lb/gal), solar absorbent: 420 g/l (3.5 lb/gal), and solid film lubricant: 880 g/l (7.3 lb/gal). [District Rule 4603] Federally Enforceable Through Title V Permit
6. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal), repair and maintenance cleaning 25 g/l (0.21 lb/gal), and cleaning of coating application equipment: 25 g/l (0.21 lb/gal). [District Rule 4603] Federally Enforceable Through Title V Permit
7. Each container or accompanying data sheet of any coating subject to this rule shall display; the maximum VOC content of the coating, as applied, and after any thinning as recommended by the manufacturer in grams of VOC per liter of coating (less water and exempt compounds), a statement of the manufacturer's recommendation regarding thinning of the coating, the name of the solvent, manufacturer's name, and the VOC content, and density of the solvent, as supplied. [District Rule 4603] 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.

8. An operator shall: store all VOC-containing coatings, thinners, cleaning materials, and waste materials in closed non-absorbent and non-leaking containers, keeping the containers closed except when specifically in use; close mixing vessels that contain VOC coatings and other materials, except when specifically in use; minimize spill of any VOC-containing materials and clean up spills immediately; and convey VOC-containing materials in closed containers or pipes. [District Rule 4603] Federally Enforceable Through Title V Permit
9. An 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, keeping the containers closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4603] Federally Enforceable Through Title V Permit
10. Only HVLP, electrostatic, electrodeposition, flow, roll, dip, brush or continuous coating application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4603] Federally Enforceable Through Title V Permit
11. Permittee shall demonstrate that HVLP guns manufactured prior to 1/1/96 operate between 0.1 and 10 psig air atomizing pressure, by manufacturer's published technical material or by use of a certified air pressure tip gauge. [District Rule 4603] Federally Enforceable Through Title V Permit
12. The permittee shall maintain a current list of coatings and solvents in use which contains all of the coating data necessary to evaluate compliance, including the following information: mix ratio of components used, VOC content and specific chemical constituents of coatings as applied, and VOC content and specific chemical constituents of solvents used for surface preparation and cleanup. [District Rule 4603] Federally Enforceable Through Title V Permit
13. Permittee shall maintain daily records which include the following information: volume coating/solvent mix ratio, VOC content (lb/gal or grams/liter) and, for dip coating operations, viscosity (cSt) of coating, volume of each coating used (gallons), and quantity of cleanup solvent used (gallons). [District Rule 4603] Federally Enforceable Through Title V Permit
14. The permittee shall maintain a record of the cumulative quantity of VOC emitted by this coating operation based on a rolling 12-month period. The cumulative total shall be updated at least monthly. [District Rules 2201 & 4603] Federally Enforceable Through Title V Permit
15. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4603] Federally Enforceable Through Title V Permit

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

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Attachment B

Detailed Facility List

SJVUAPCD
NORTHERN

Detailed Facility Report
For Facility=222 and excluding Deleted Permits
Sorted by Facility Name and Permit Number

6/28/12
2:07 pm

COMMERCIAL BLDG COMPONENTS, INC 1700 E LOUISE AVE LATHROP, CA 95330	FAC # STATUS: TELEPHONE:	N 222 A	TYPE: TOXIC ID:	TitleV 20292	EXPIRE ON: AREA: INSP. DATE:	07/31/2014 2 / 12/13
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PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
N-222-1-1	misc	3020-06	1	105.00	105.00	A	OUTDOOR METAL PARTS AND PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN, AND SPRAY GUN CLEANER

Number of Facilities Reported: 1

Attachment C

Exempt Equipment

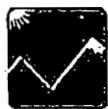
The following exempt equipment was identified by the applicant on TVFORM-003, Insignificant Activities:

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 \leq six months.	6.6.10	

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 ≥ 302 F or of fuel oil with specific gravity ≥ 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 ≥ 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 ≥ 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 ≤ 100 lb/day and 1,000 lb/day	7.4	

Attachment D

Current SJVUAPCD Permit



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

FILE

Permit to Operate

FACILITY: N-222

EXPIRATION DATE: 07/31/2014

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

**COMMERCIAL BLDG COMPONENTS, INC
1700 E LOUISE
LATHROP, CA 95330**

FACILITY LOCATION:

**1700 E LOUISE
LATHROP, CA 95330**

FACILITY DESCRIPTION:

METAL FABRICATION

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

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

Seyed Sadredin
Executive Director / APCO

David Warner
Director of Permit Services

**San Joaquin Valley
Air Pollution Control District**

FILE

PERMIT UNIT: N-222-1-1

EXPIRATION DATE: 07/31/2014

EQUIPMENT DESCRIPTION:

OUTDOOR METAL PARTS AND PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN, AND SPRAY GUN CLEANER

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. Daily emissions from the coating operation shall not exceed either of the following limits: 150.0 lb-VOC/day or 67.4 lb-PM10/day. [District Rule 2201]
4. Annual emissions from the coating operation shall not exceed 49,999 lb-VOC/calendar year. [District Rule 2201]
5. VOC content of any coatings as applied, excluding water and exempt compounds, used for any metal parts or product shall not exceed any of the following limits, except as allowed elsewhere in this permit: baked coating 275 g/l (2.3 lb/gal), air-dried coating: 340 g/l (2.8 lb/gal), air-dried dip coating of steel joists with coating viscosity, as applied, of more than 45.6 centistokes at 78 °F or an average dry-film thickness of greater than 2.0 millimeters: 340 g/l (2.8 lb/gal), air-dried dip coating of steel joists with coating viscosity, as applied, of less than or equal to 45.6 centistokes at 78 °F or an average dry-film thickness of less than or equal to 2.0 millimeters: 400 g/l (3.32 lb/gal). [District Rule 4603]
6. VOC content of baked specialty coatings as applied, excluding water and exempt compounds, used for metal parts or product shall not exceed any of the following limits: camouflage 360 g/l (3.0 lb/gal), extreme performance: 420 g/l (3.5 lb/gal), heat resistant: 360 g/l (3.0 lb/gal), high gloss: 360 g/l (3.0 lb/gal), high performance architectural: 420 g/l (3.5 lb/gal), high temperature: 420 g/l (3.5 lb/gal), metallic topcoat: 360 g/l (3.0 lb/gal), pretreatment wash primer: 420 g/l (3.5 lb/gal), silicone release: 420 g/l (3.5 lb/gal), solar absorbent: 360 g/l (3.0 lb/gal), and solid film lubricant: 880 g/l (7.3 lb/gal). [District Rule 4603]
7. VOC content of air-dried specialty coatings as applied, excluding water and exempt compounds, used for metal parts or product shall not exceed any of the following limits: camouflage 420 g/l (3.5 lb/gal), extreme performance: 420 g/l (3.5 lb/gal), heat resistant: 420 g/l (3.5 lb/gal), high gloss: 420 g/l (3.5 lb/gal), high performance architectural: 420 g/l (3.5 lb/gal), high temperature: 420 g/l (3.5 lb/gal), metallic topcoat: 420 g/l (3.5 lb/gal), pretreatment wash primer: 420 g/l (3.5 lb/gal), silicone release: 420 g/l (3.5 lb/gal), solar absorbent: 420 g/l (3.5 lb/gal), and solid film lubricant: 880 g/l (7.3 lb/gal). [District Rule 4603]
8. 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 4603]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

Permit Unit Requirements for N-222-1-1 (continued)

9. Cleaning activities that use solvents with a VOC content greater than 50 g/l (0.42 lb/gallon) shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure; or by pumping. [District Rule 4603]
10. Permittee shall not use materials with a VOC content greater than 50 g/l (0.42 lb/gallon) for spray equipment clean-up unless an enclosed system, or equipment proven to be equally effective at controlling emissions, is used for cleaning. [District Rule 4603]
11. All fresh or spent coatings, adhesives, catalysts, thinners and solvents shall be stored in closed containers. Solvent laden cloth or paper shall be stored and disposed in closed non-absorbent containers. [District Rule 4603]
12. Only HVLP, electrostatic, electrodeposition, flow, roll, dip, brush or continuous coating application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4603]
13. Permittee shall demonstrate that HVLP guns manufactured prior to 1/1/96 operate between 0.1 and 10 psig air atomizing pressure, by manufacturer's published technical material or by use of a certified air pressure tip gauge. [District Rule 4603]
14. Permittee shall keep a record of the VOC emissions for each calendar year. The record shall be updated at least on a monthly basis. [District Rule 2201]
15. Permittee shall maintain daily records of the following: quantity and type of coatings and solvents used, mix ratios (by volume) of components added to each coating, volume of coatings applied, VOC content of each coating as applied, and VOC content of each solvent. [District Rule 4603]
16. Permittee shall keep the following records for solvent cleaning activities: manufacturer's 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 4603]
17. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4603]

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

**SAN JOAQUIN VALLEY
UNIFIED AIR POLLUTION CONTROL DISTRICT**

Commercial Building Components, Inc.

**PROPOSED ENGINEERING EVALUATION
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Attachment E

Stringency Comparison for District Rule 4601

Stringency Comparison of District Rule 4601 Non-SIP Version (12/17/09) to Current SIP Version (10/31/01)

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
2.0 Applicability	This rule is applicable to any person who supplies, sells, offers for sale, applies, or solicits the application of any architectural coating, or who manufactures any architectural coating for use within the District.	This rule is applicable to any person who supplies, sells, offers for sale, applies, or solicits the application of any architectural coating, or who manufactures, blends or repackages any architectural coating for use within the District.	No change in the applicability, therefore, non-SIP version of rule is as stringent as SIP version.
4.0 Exemptions	<p>The provisions of this rule shall not apply to:</p> <p>4.1 Any architectural coating that is sold or manufactured for use outside of the District or for shipment to other manufacturers for reformulation or repackaging.</p> <p>4.2 Any architectural coating that is sold in a containers with a volume of one liter (1.057 quarts) or less.</p> <p>4.3 Any aerosol coating product.</p>	<p>4.1 The provisions of this rule shall not apply to:</p> <p>4.1.1 Any architectural coating that is supplied, sold, offered for sale, or manufactured for use outside of the District or for shipment to other manufacturers for reformulation or repackaging.</p> <p>4.1.2 Any aerosol coating product.</p> <p>4.2 With the exception of Section 6.2, the provisions of this rule shall not apply to any architectural coating that is sold in a container with a volume of one liter (1.057 quarts) or less.</p>	The only change is to require reporting requirements as discussed in Section 6.2 of the non-SIP approved version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.
5.0 Requirements	Note: Section 5.0 requirements refer to Table of Standards, Table of Standards 1, and Table of Standards 2. These tables are included as Attachment X.		
	<p>5.1 VOC Content Limits: Except as provided in Sections 5.2, 5.3, 5.8 and 8.0, no person shall:</p> <p>5.1.1 manufacture, blend, or repackage for sale within the District;</p> <p>5.1.2 supply, sell, or offer for sale within the district;</p> <p>5.1.3 solicit for application or apply within the District any architectural coating with a VOC content in excess of the corresponding limit specified in the Table of Standards, after the specified effective date in the Table of Standards.</p>	<p>5.1 VOC Content Limits: Except as provided in Sections 5.2 and 5.3, no person shall: manufacture, blend, or repackage for use within the District; or supply, sell, or offer for sale within the District; or solicit for application or apply within the District any architectural coating with a VOC content in excess of the corresponding limit specified in the Table of Standards 1 or the Table of Standards 2, after the specified effective date in the Table of Standards 1 or the Table of Standards 2. Limits are expressed as VOC Regulatory, thinned to the manufacturer's maximum thinning recommendation, excluding any colorant added to tint bases.</p>	Sections 5.8 and 8.0 of the SIP version are not included in the non-SIP version. As discussed in corresponding sections the non-SIP version is more stringent. The Table of Standards and Table of Standards 1 have the same VOC limits. Table of Standard 2 is more stringent as discussed below. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.
	<p>5.2 Most Restrictive VOC Limit: If anywhere on the container of any architectural coating, or any label or sticker affixed to the container, or in any sales, advertising, or technical literature supplied by a manufacturer or anyone acting on their behalf, any representation is made that indicates that the coating meets the definition of or is recommended for use for more than one of the coating categories listed in the Table of Standards, then the most restrictive VOC content limit shall apply. This provision does not apply to the following coating categories:</p> <p>5.2.1 Lacquer coatings (including lacquer sanding sealers)</p> <p>5.2.2 Metallic pigmented coatings</p> <p>5.2.3 Shellacs</p> <p>5.2.4 Fire-retardant coatings</p> <p>5.2.5 Pretreatment wash primers</p> <p>5.2.6 Industrial maintenance coatings</p> <p>5.2.7 Low-solids coatings</p>	<p>5.2 Most Restrictive VOC Limit: If a coating meets the definition in Section 3.0 for one or more specialty coating categories listed in the Table of Standards 1 or the Table of Standards 2, then that coating is not required to meet the VOC limits for Flat, Nonflat, or Nonflat – High Gloss coatings, but is required to meet the VOC limit for the applicable specialty coating listed in the Table of Standards 1 or the Table of Standards 2.</p> <p>5.2.1 Effective until December 31, 2010, with the exception of the specialty coating categories specified in Section 5.2.3.1 through 5.2.3.15, if a coating is recommended for use in more than one of the specialty coating categories listed in the Table of Standards 1, the most restrictive (or lowest) VOC content limit shall apply.</p> <p>5.2.2 Effective on and after January 1, 2011, with the exception of the</p>	The VOC limit of the non-SIP version is at least as stringent as the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>5.2.8 Wood preservatives 5.2.9 High temperature coatings 5.2.10 Temperature-indicator safety coatings 5.2.11 Antenna coatings 5.2.12 Antifouling coatings 5.2.13 Flow coatings 5.2.14 Bituminous roof primers 5.2.15 Specialty primers, sealers and undercoaters</p>	<p>specialty coating categories specified in Sections 5.2.3.2, 5.2.3.3, 5.2.3.5 through 5.2.3.9, and 5.2.3.14 through 5.2.3.18, if a coating is recommended for use in more than one of the specialty coating categories listed in the Table of Standards 2, the most restrictive (or lowest) VOC content limit shall apply.</p> <p>5.2.3 This requirement applies to: usage recommendations that appear anywhere on the coating container, anywhere on any label or sticker affixed to the container, or in any sales, advertising, or technical literature supplied by a manufacturer or anyone acting on their behalf.</p> <p>5.2.3.1 Lacquer coatings (including lacquer sanding sealers) 5.2.3.2 Metallic pigmented coatings 5.2.3.3 Shellacs 5.2.3.4 Fire-retardant coatings 5.2.3.5 Pretreatment wash primers 5.2.3.6 Industrial maintenance coatings 5.2.3.7 Low-solids coatings 5.2.3.8 Wood preservatives 5.2.3.9 High temperature coatings 5.2.3.10 Temperature-indicator safety coatings 5.2.3.11 Antenna coatings 5.2.3.12 Antifouling coatings 5.2.3.13 Flow coatings 5.2.3.14 Bituminous roof primers 5.2.3.15 Specialty primers, sealers and undercoaters 5.2.3.16 Aluminum roof coatings 5.2.3.17 Zinc-rich primers 5.2.3.18 Wood Coatings</p>	
	<p>5.3 Sell-Through of Coatings: 5.3.1 A coating manufactured prior to the January 1, 2003 or January 1, 2004 effective date specified for that coating in the Table of Standards may be sold, supplied, or offered for sale for up to three years after the specified effective date. In addition, a coating manufactured before the effective date specified for that coating in the Table of Standards may be applied at any time, both before and after the specified effective date, so long as the coating complied with the standards in effect at the time the coating was manufactured. This Section 5.3 does not apply to any coating that does not display the date or date-code required by Section 6.1.1. 5.3.2 A coating included in an approved Averaging Program that does not comply with the specified limit in the</p>	<p>5.3 Sell-Through of Coatings: A coating manufactured prior to the effective date specified for that coating in the Table of Standards 1 or the Table of Standards 2, and that complied with the standards in effect at the time the coating was manufactured, may be sold, supplied, or offered for sale for up to three years after the specified effective date. In addition, a coating manufactured before the effective date specified for that coating in the Table of Standards 1 or the Table of Standards 2 may be applied at any time, both before and after the specified effective date, so long as the coating complied with the standards in effect at the time the coating was manufactured. This Section 5.3 does not apply to any coating that does not display the date or date-code required by Section 6.1.1.</p>	<p>The VOC limit of the non-SIP version is at least as stringent as the SIP version. Section 5.3.2 was removed it is no longer applicable in the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</p>

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>Table of Standards may be sold, supplied, or offered for sale for up to three years after the end of the compliance period specified in the approved Averaging Program. In addition, such a coating may be applied at any time, both during and after the compliance period. This Section 5.3.2 does not apply to any coating that does not display on the container either the statement: "This product is subject to architectural coatings averaging provisions in California" or a substitute symbol specified by the Executive Officer of the California Air Resources Board (ARB). This Section 5.3.2 shall remain in effect until January 1, 2008.</p>		
	<p>5.4 Painting Practices: All architectural coating containers used to apply the contents therein to a surface directly from the container by pouring, siphoning, brushing, rolling, padding, ragging or other means, shall be closed when not in use. These architectural coating containers include, but are not limited to, drums, buckets, cans, pails, trays or other application containers. Containers of any VOC containing materials used for thinning and cleanup shall also be closed when not in use.</p>	<p>5.4 Painting Practices: All architectural coating containers used to apply the contents therein to a surface directly from the container by pouring, siphoning, brushing, rolling, padding, ragging or other means, shall be closed when not in use. These architectural coating containers include, but are not limited to, drums, buckets, cans, pails, trays or other application containers. Containers of any VOC-containing materials used for thinning and cleanup shall also be closed when not in use.</p>	<p>No change in the requirements, therefore, non-SIP version of rule is as stringent as SIP version.</p>
	<p>5.5 Thinning: No person who applies or solicits the application of any architectural coating shall apply a coating that is thinned to exceed the applicable VOC limit specified in the Table of Standards.</p>	<p>5.5 Thinning: No person who applies or solicits the application of any architectural coating shall apply a coating that is thinned to exceed the applicable VOC limit specified in the Table of Standards 1 or the Table of Standards 2.</p>	<p>The VOC limit of the non-SIP version is at least as stringent as the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</p>
	<p>5.6 Rust Preventative Coatings: Effective January 1, 2004, no person shall apply or solicit the application of any rust preventative coating for industrial use, unless such a rust preventative coating complies with the industrial maintenance coating VOC limit specified in the Table of Standards.</p>	<p>5.6 Rust Preventative Coatings: Effective through December 31, 2010, no person shall apply or solicit the application of any rust preventative coating for industrial use, unless such a rust preventative coating complies with the industrial maintenance coating VOC limit specified in the Table of Standards 1.</p>	<p>The VOC limit of the non-SIP version is at least as stringent as the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</p>
	<p>5.7 Coatings Not Listed in the Table of Standards: For any coating that does not meet any of the definitions for the specialty coatings categories listed in the Table of Standards, the VOC content limit shall be determined by classifying the coating as a flat coating or a nonflat coating, based on its gloss, as defined in Sections 3.21, 3.36 and 3.37 and the corresponding flat or nonflat VOC limit shall apply.</p>	<p>5.7 Coatings Not Listed in the Table of Standards 1 or the Table of Standards 2: For any coating that does not meet any of the definitions for the specialty coatings categories listed in the Table of Standards 1 or the Table of Standards 2, the VOC content limit shall be determined by classifying the coating as a Flat, Nonflat, or Nonflat – High Gloss coating, based on its gloss, and the corresponding Flat, Nonflat, or Nonflat – High Gloss VOC limit in the Table of Standards 1 or the Table of Standards 2 shall apply.</p>	<p>The VOC limit of the non-SIP version is at least as stringent as the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</p>
	<p>5.8 Lacquers: Notwithstanding the provisions of Section 3.1, a person or facility may add up to 10 percent by volume of VOC to a lacquer to avoid blushing of the finish during days with relative humidity greater</p>	<p>—</p>	<p>This section has been removed. The operation is required to meet the lacquer VOC limit regardless of</p>

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	than 70 percent and temperature below 65°F, at the time of application, provided that the coating contains acetone and no more than 550 grams of VOC per liter of coating, less water and exempt compounds, prior to the addition of VOC.		temperature and humidity. Therefore, non-SIP version of rule is as stringent as SIP version
	5.9 Averaging Compliance Option: On or after January 1, 2003, in lieu of compliance with the specified limits in The Table of Standards for floor coatings; industrial maintenance coatings; primers, sealers, and undercoaters; quick-dry primers, sealers, and undercoaters; quick-dry enamels; roof coatings; bituminous roof coatings; rust preventative coatings; stains; waterproofing sealers, as well as flats and non-flats (excluding recycled coatings), manufacturers may average designated coatings such that their actual cumulative emissions from the averaged coatings are less than or equal to the cumulative emissions that would have been allowed under those limits over a compliance period not to exceed one year. Such manufacturers must also comply with the averaging provisions contained in Section 8.0, as well as maintain and make available for inspection records for at least three years after the end of the compliance period. This Section 5.9 and Section 8.0 shall cease to be effective on January 1, 2005, after which averaging will no longer be allowed.	---	This section is removed from the non-SIP version, it is no longer applicable. Therefore, non-SIP version of rule is as stringent as SIP version.
	---	5.8 Prior to January 1, 2011, any coating that meets a definition in Section 3.0 for a coating category listed in the Table of Standards 2 and complies with the applicable VOC limit in the Table of Standards 2 and with Sections 5.2 and 6.1 (including those provision of Section 6.1 otherwise effective on January 1, 2011) shall be considered in compliance with this rule.	Table of Standards 2 is more stringent than the VOC limits of Table of Standards in the SIP-Approved version. Therefore, non-SIP version of rule is as stringent as SIP version.
6.0 Administrative Requirements	Table of Standards (See Attachment X for Table)	Table of Standards 1 (Effective through 12/31/10) (See Attachment X for Table)	The non-SIP rule requirements are the same as the Table of Standards in the SIP approved rule, except Table of Standards 1 expires at which time Table of Standards 2 is in effect. As discussed below these standards are more stringent. Therefore, non-SIP version of rule is as stringent as SIP version.
6.0 Administrative Requirements		Table of Standards 2 (Effective on and after 1/1/11) (See Attachment X for Table)	The requirements of Table of Standards 2 are more stringent than the Table of Standards in the SIP rule. Therefore, non-SIP version of rule is as stringent as SIP version.
6.0 Administrative Requirements	6.1 Labeling Requirements: Each manufacturer of any architectural coating subject to this rule shall display the information listed in Sections	6.1 Labeling Requirements: Each manufacturer of any architectural coating subject to this rule shall display the	The non-SIP approved rule contain sections listed in the SIP rule plus

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>6.1.1 through 6.1.9 on the coating container (or label) in which the coating is sold or distributed.</p> <p>6.1.1 Date Code: The date the coating was manufactured, or a date code representing the date, shall be indicated on the label, lid or bottom of the container. If the manufacturer uses a date code for any coating, the manufacturer shall file an explanation of each code with the Executive Officer of the ARB.</p> <p>6.1.2 Thinning Recommendations: A statement of the manufacturer's recommendation regarding thinning of the coating shall be indicated on the label or lid of the container. This requirement does not apply to the thinning of architectural coatings with water. If thinning of the coating prior to use is not necessary, the recommendation must specify that the coating is to be applied without thinning.</p> <p>6.1.3 VOC Content: Each container of any coating subject to this rule shall display either the maximum or actual VOC content of the coating, as supplied, including the maximum thinning as recommended by the manufacturer. VOC content shall be displayed in grams of VOC per liter of coating. VOC content displayed shall be calculated using product formulation data, or shall be determined using the test methods in Section</p> <p>6.3.1. The equations in Sections 3.25 or 3.26, as appropriate, shall be used to calculate VOC content.</p> <p>6.1.4 Industrial Maintenance Coatings: In addition to the information specified in Sections 6.1.1, 6.1.2 and 6.1.3, each manufacturer of any industrial maintenance coating subject to this rule shall display on the label or lid of the container in which the coating is sold or distributed one or more of the following descriptions listed in Section 6.1.4.1 through 6.1.4.3.</p> <p>6.1.4.1 "For industrial use only"</p> <p>6.1.4.2 "For professional use only"</p> <p>6.1.4.3 "Not for residential use" or "Not intended for residential use"</p> <p>6.1.5 Clear Brushing Lacquers: Effective January 1, 2003, the labels of all clear brushing lacquers shall prominently display the statements "For brush application only," and "This product must not be thinned or sprayed."</p> <p>6.1.6 Rust Preventative Coatings: Effective January 1, 2003, the labels of all rust preventative coatings shall prominently display the statement "For Metal Substrates Only"</p> <p>6.1.7 Specialty Primers, Sealers and Undercoaters: Effective January 1, 2003, the labels of all specialty primers, sealers and undercoaters shall prominently</p>	<p>information listed in Sections 6.1.1 through 6.1.14 on the coating container (or label) in which the coating is sold or distributed.</p> <p>6.1.1 Date Code: The date the coating was manufactured, or a date code representing the date, shall be indicated on the label, lid or bottom of the container. If the manufacturer uses a date code for any coating, the manufacturer shall file an explanation of each code with the Executive Officer of the ARB.</p> <p>6.1.2 Thinning Recommendations: A statement of the manufacturer's recommendation regarding thinning of the coating shall be indicated on the label or lid of the container. This requirement does not apply to the thinning of architectural coatings with water. If thinning of the coating prior to use is not necessary, the recommendation must specify that the coating is to be applied without thinning.</p> <p>6.1.3 VOC Content: Each container of any coating subject to this rule shall display one of the following values, in grams of VOC per liter of coating:</p> <p>6.1.3.1 Maximum VOC Content, as determined from all potential product formulations; or</p> <p>6.1.3.2 VOC Content, as determined from actual formulation data; or</p> <p>6.1.3.3 VOC Content, as determined using the test methods in Section 6.3.2.</p> <p>If the manufacturer does not recommend thinning, the container must display the VOC Content, as supplied. If the manufacturer recommends thinning, the container must display the VOC Content, including the maximum amount of thinning solvent recommended by the manufacturer. If the coating is a multicomponent product, the container must display the VOC content as mixed or catalyzed. If the coating contains silanes, siloxanes, or other ingredients that generate ethanol or other VOCs during the curing process, the VOC content must include the VOCs emitted during curing.</p> <p>6.1.4 Faux Finishing Coatings: Effective January 1, 2011, the labels of all clear topcoat Faux Finishing coatings shall prominently display the statement "This product can only be sold or used as part of a Faux Finishing coating system".</p> <p>6.1.5 Industrial Maintenance Coatings: Each manufacturer of any industrial maintenance coating subject to this rule shall display on the label or lid of</p>	<p>additional requirements not found in the SIP version. Therefore, non-SIP version of rule is as stringent as SIP version.</p>

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	<p>display one or more of the descriptions listed in Section</p> <p>6.1.7.1 through 6.1.7.5.</p> <p>6.1.7.1 For blocking stains.</p> <p>6.1.7.2 For fire-damaged substrates.</p> <p>6.1.7.3 For smoke-damaged substrates.</p> <p>6.1.7.4 For water-damaged substrates.</p> <p>6.1.7.5 For excessively chalky substrates.</p> <p>6.1.8 Quick Dry Enamels: Effective January 1, 2003, the labels of all quick dry enamels shall prominently display the words "Quick Dry" and the dry hard time.</p> <p>6.1.9 Non-flat – High Gloss Coatings: Effective January 1, 2003, the labels of all non-flat – high gloss coatings shall prominently display the words "High Gloss".</p>	<p>the container in which the coating is sold or distributed one or more of the following descriptions listed in Section 6.1.5.1 through 6.1.5.3.</p> <p>6.1.5.1 "For industrial use only"</p> <p>6.1.5.2 "For professional use only"</p> <p>6.1.5.3 "Not for residential use" or "Not intended for residential use"</p> <p>6.1.6 Clear Brushing Lacquers: The labels of all clear brushing lacquers shall prominently display the statements "For brush application only," and "This product must not be thinned or sprayed." (Category deleted effective January 1, 2011.)</p> <p>6.1.7 Rust Preventative Coatings: The labels of all rust preventative coatings shall prominently display the statement "For Metal Substrates Only".</p> <p>6.1.8 Specialty Primers, Sealers and Undercoaters: Effective until December 31, 2010, the labels of all specialty primers, sealers and undercoaters shall prominently display one or more of the descriptions listed in Section 6.1.8.1 through 6.1.8.5. Effective on and after January 1, 2011, the labels of all specialty primers, sealers, and undercoaters shall prominently display one or more of the descriptions listed in Sections 6.1.8.1 through 6.1.8.3. On and after January 1, 2011, Sections 6.1.8.4 and 6.1.8.5 will be no longer effective.</p> <p>6.1.8.1 For fire-damaged substrates.</p> <p>6.1.8.2 For smoke-damaged substrates.</p> <p>6.1.8.3 For water-damaged substrates.</p> <p>6.1.8.4 For excessively chalky substrates.</p> <p>6.1.8.5 For blocking stains.</p> <p>6.1.9 Quick Dry Enamels: The labels of all quick dry enamels shall prominently display the words "Quick Dry" and the dry hard time. (Category deleted effective January 1, 2011.)</p> <p>6.1.10 Reactive Penetrating Sealers: Effective January 1, 2011, the labels of all Reactive Penetrating Sealers shall prominently display the statement "Reactive Penetrating Sealer."</p> <p>6.1.11 Stone Consolidants: Effective January 1, 2011, the labels of all Stone Consolidants shall prominently display the statement "Stone Consolidant - For Professional Use Only."</p> <p>6.1.12 Nonflat– High Gloss Coatings: The labels of all Nonflat – high gloss coatings shall prominently display the words "High Gloss."</p>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
		<p>6.1.13 Wood Coatings: Effective January 1, 2011, the labels of all Wood Coatings shall prominently display the statement "For Wood Substrates Only."</p> <p>6.1.14 Zinc Rich Primers: Effective January 1, 2011, the labels of all Zinc Rich Primers shall prominently display one or more of the following descriptions listed in Section 6.1.14.1 through 6.1.14.3.</p> <p>6.1.14.1 "For industrial use only"</p> <p>6.1.14.2 "For professional use only"</p> <p>6.1.14.3 "Not for residential use" or "Not intended for residential use"</p>	
	<p>6.2 Reporting Requirements</p> <p>6.2.1 Clear Brushing Lacquers: Each manufacturer of clear brushing lacquers shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of clear brushing lacquers sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.2 Rust Preventative Coatings: Each manufacturer of rust preventative coatings shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of rust preventative coatings sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.3 Specialty Primers, Sealers and Undercoaters: Each manufacturer of specialty primers, sealers and undercoaters shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of specialty primers, sealers and undercoaters sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.4 Toxic Exempt Compounds: For each architectural coating that contains perchloroethylene or methylene chloride, the manufacturer shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB the following information for products sold in the State during the preceding year:</p> <p>6.2.4.1 the product brand name and a copy of the product label with legible usage instructions;</p>	<p>6.2 Reporting Requirements</p> <p>The reporting requirements specified in Sections 6.2.1 through 6.2.6 shall apply until December 31, 2010.</p> <p>6.2.1 Clear Brushing Lacquers: Each manufacturer of clear brushing lacquers shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of clear brushing lacquers sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.2 Rust Preventative Coatings: Each manufacturer of rust preventative coatings shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of rust preventative coatings sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.3 Specialty Primers, Sealers and Undercoaters: Each manufacturer of specialty primers, sealers and undercoaters shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of specialty primers, sealers and undercoaters sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.4 Toxic Exempt Compounds: For each architectural coating that contains perchloroethylene or methylene chloride, the manufacturer shall, on or before April 1 of each calendar year beginning in the year 2004, submit an</p>	<p>Until December 31, 2010 both versions of the rule have the same reporting requirements. After that date the non-SIP approved rule includes very specific information to be kept and is required for all architectural coatings. Therefore, non-SIP version of rule is as stringent as SIP version.</p>

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>6.2.4.2 the product category listed in the Table of Standards to which the coating belongs;</p> <p>6.2.4.3 the total sales in California during the calendar year to the nearest gallon;</p> <p>6.2.4.4 the volume percent, to the nearest 0.10 percent, of perchloroethylene and methylene chloride in the coating.</p> <p>6.2.5 Recycled Coatings: Manufacturers of recycled coatings must submit a letter to the Executive Officer of the ARB certifying their status as a Recycled Paint Manufacturer. The manufacturer shall, on or before April 1 of each calendar year beginning with the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall include, for all recycled coatings, the total number of gallons distributed in the State during the preceding year, and shall describe the method used by the manufacturer to calculate State distribution.</p> <p>6.2.6 Bituminous Coatings: Each manufacturer of bituminous roof coatings or bituminous roof primers shall, on or before April 1 of each calendar year beginning with the year 2004, submit an annual report to the Executive Officer of ARB. The report shall specify the number of gallons of bituminous roof coatings or bituminous roof primers sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p>	<p>annual report to the Executive Officer of the ARB the following information for products sold in the State during the preceding year:</p> <p>6.2.4.1 the product brand name and a copy of the product label with legible usage instructions;</p> <p>6.2.4.2 the product category listed in the Table of Standards 1 or the Table of Standards 2 to which the coating belongs;</p> <p>6.2.4.3 the total sales in California during the calendar year to the nearest gallon;</p> <p>6.2.4.4 the volume percent, to the nearest 0.10 percent, of perchloroethylene and methylene chloride in the coating.</p> <p>6.2.5 Recycled Coatings: Manufacturers of recycled coatings must submit a letter to the Executive Officer of the ARB certifying their status as a Recycled Paint Manufacturer. The manufacturer shall, on or before April 1 of each calendar year beginning with the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall include, for all recycled coatings, the total number of gallons distributed in the State during the preceding year, and shall describe the method used by the manufacturer to calculate State distribution.</p> <p>6.2.6 Bituminous Coatings: Each manufacturer of bituminous roof coatings or bituminous roof primers shall, on or before April 1 of each calendar year beginning with the year 2004, submit an annual report to the Executive Officer of ARB. The report shall specify the number of gallons of bituminous roof coatings or bituminous roof primers sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate state sales.</p> <p>6.2.7 Effective on and after January 1, 2011, Sales Data: All sales data listed in Sections 6.2.7.1 to 6.2.7.14 shall be maintained on-site by the responsible official for a minimum of three years. A responsible official from each manufacturer shall upon request of the Executive Officer of the ARB, or his or her delegate, provide data concerning the distribution and sales of architectural coatings. Sales data submitted by the responsible official to the Executive Officer of the ARB may be claimed as confidential, and such information shall be handled in accordance with the procedures specified in Title 17,</p>	

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		<p>California Code of Regulations Sections 91000-91022. The responsible official shall within 180 days provide information, including, but not limited to the data listed in Sections 6.2.7.1 through 6.2.7.14:</p> <p>6.2.7.1 the name and mailing address of the manufacturer;</p> <p>6.2.7.2 the name, address and telephone number of a contact person;</p> <p>6.2.7.3 the name of the coating product as it appears on the label and the applicable coating category;</p> <p>6.2.7.4 whether the product is marketed for interior or exterior use or both;</p> <p>6.2.7.5 the number of gallons sold in California in containers greater than one liter (1.057 quart) and equal to or less than one liter (1.057 quart);</p> <p>6.2.7.6 the VOC Actual content and VOC Regulatory content in grams per liter. If thinning is recommended, list the VOC Actual content and VOC Regulatory content after maximum recommended thinning. If containers less than one liter have a different VOC content than containers greater than one liter, list separately. If the coating is a multi-component product, provide the VOC content as mixed or catalyzed;</p> <p>6.2.7.7 the names and CAS numbers of the VOC constituents in the product;</p> <p>6.2.7.8 the names and CAS numbers of any compounds in the product specifically exempted from the VOC definition;</p> <p>6.2.7.9 whether the product is marketed as solvent-borne, waterborne, or 100% solids;</p> <p>6.2.7.10 description of resin or binder in the product;</p> <p>6.2.7.11 whether the coating is a single-component or multi-component product;</p> <p>6.2.7.12 the density of the product in pounds per gallon;</p> <p>6.2.7.13 the percent by weight of: solids, all volatile materials, water, and any compounds in the product specifically exempted from the VOC definition; and</p> <p>6.2.7.14 the percent by volume of: solids, water, and any compounds in the product specifically exempted from the VOC definition.</p>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>6.3 Test Methods</p> <p>6.3.1 VOC Content of Coatings: To determine the physical properties of a coating in order to perform the calculations in Section 3.26 and 3.27, the reference method for VOC content is U.S. EPA Method 24, except as provided in Sections 6.3.2 and 6.3.15. An alternative method to determine the VOC content of coatings is SCAQMD Method 304-91 (Revised February 1996), incorporated by reference in Section 6.3.14. The exempt compounds content shall be determined by SCAQMD Method 303-91 (Revised August 1996), incorporated by reference in Section 6.3.12. To determine the VOC content of a coating, the manufacturer may use U.S. EPA Method 24, or an alternative method as provided in Section 6.3.2, formulation data, or any other reasonable means for predicting that the coating has been formulated as intended (e.g., quality assurance checks, recordkeeping). However, if there are any inconsistencies between the results of a Method 24 test and any other means for determining VOC content, the Method 24 test results will govern, except when an alternative method is approved as specified in Section 6.3.2. The District Air Pollution Control Officer (APCO) may require the manufacturer to conduct a Method 24 analysis.</p> <p>6.3.2 Alternative Test Methods: Other test methods demonstrated to provide results that are acceptable for purposes of determining compliance with Section 6.3.1, after review and approved in writing by the staffs of the District, the ARB and the U.S. EPA, may also be used. 6.3.3 Methacrylate Traffic Marking Coatings: Analysis of methacrylate multicomponent coatings used as traffic marking coatings shall be conducted according to a modification of U.S. EPA Method 24 (40 CFR 59, subpart D, Appendix A), incorporated by reference in Section 6.3.15. This method has not been approved for methacrylate multicomponent coatings used for other purposes than as traffic marking coatings or for other classes of multicomponent coatings.</p> <p>6.3.4 Flame Spread Index: The flame spread index of a fire-retardant coating shall be determined by ASTM Designation E 84-99, "Standard Test Method for Surface Burning Characteristics of Building Materials"(see Section 3, Fire-Retardant Coating).</p> <p>6.3.5 Fire Resistance Rating: The fire</p>	<p>6.3 Test Methods</p> <p>The test methods listed below shall be used to demonstrate compliance with this rule. Alternate equivalent test methods may be used provided the test methods have been approved by the APCO and EPA.</p> <p>6.3.1 Calculation of VOC Content: For the purpose of determining compliance with the VOC content limits in the Table of Standards 1 or the Table of Standards 2, the VOC content of a coating shall be determined as defined in Section 3.77, 3.78, or 3.79 as appropriate. The VOC content of a tint base shall be determined without colorant that is added after the tint base is manufactured. If the manufacturer does not recommend thinning, the VOC Content must be calculated for the product as supplied. If the manufacturer recommends thinning, the VOC Content must be calculated including the maximum amount of thinning solvent recommended by the manufacturer. If the coating is a multi-component product, the VOC content must be calculated as mixed or catalyzed. If the coating contains silanes, siloxanes, or other ingredients that generate ethanol or other VOC during the curing process, the VOC content must include the VOCs emitted during curing.</p> <p>6.3.2 VOC Content of Coatings: To determine the physical properties of a coating in order to perform the calculations in Section 3.77 and 3.79, the reference method for VOC content is EPA Method 24, except as provided in Sections 6.3.3 and 6.3.16. An alternative method to determine the VOC content of coatings is SCAQMD Method 304-91 (Revised February 1996). The exempt compounds content shall be determined by SCAQMD Method 303-91 (Revised 1993), BAAQMD Method 43 (Revised 1996), or BAAQMD Method 41 (Revised 1995), as applicable. To determine the VOC content of a coating, the manufacturer may use EPA Method 24, or an alternative method as provided in Section 6.3.3, formulation data, or any other reasonable means for predicting that the coating has been formulated as intended (e.g., quality assurance checks, recordkeeping). However, if there are any inconsistencies between the results of EPA Method 24 test and any other means for determining VOC content, the EPA Method 24</p>	<p>The non-SIP version includes all the requirements of the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</p>

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>resistance rating of a fire-resistive coating shall be determined by ASTM Designation E 119-98, "Standard Test Methods for Fire Tests of Building Construction Materials"(see Section 3, Fire-Resistive Coating).</p> <p>6.3.6 Gloss Determination: The gloss of a coating shall be determined by ASTM Designation D 523-89 (1999), "Standard Test Method for Specular Gloss"(see Section 3, Flat Coating, Nonflat Coating, Nonflat-High Gloss Coating and Quick-Dry Enamel).</p> <p>6.3.7 Metal Content of Coatings: The metallic content of a coating shall be determined by SCAQMD Method 318-95, Determination of Weight Percent Elemental Metal in Coatings by X-Ray Diffraction, <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i> (see Section 3, Metallic Pigmented Coating).</p> <p>6.3.8 Acid Content of Coatings: The acid content of a coating shall be determined by ASTM Designation D 1613-96, "Standard Test Method for Acidity in Volatile Solvents and Chemical Intermediates Used in Paint, Varnish, Lacquer and related products"(see Section 3, Pre-Treatment Wash Primer).</p> <p>6.3.9 Drying Times: The set-to-touch, dry-hard, dry-to-touch and dry-to-recoat times of a coating shall be determined by ASTM Designation D 1640-95, "Standard Test Methods for Drying, Curing, or Film Formation of Organic Coatings at Room Temperature" (see Section 3, Quick-Dry Enamel and Quick-Dry Primer, Sealer and Undercoater) The tack-free time of a quickdry enamel coating shall be determined by the Mechanical Test Method of ASTM Designation D 1640-95.</p> <p>6.3.10 Surface Chalkiness: The chalkiness of a surface shall be determined using ASTM Designation D4214-98, "Standard Test Methods for Evaluating the Degree of Chalking of Exterior Paint Films"(see Section 3, Specialty Primer, Sealer and Undercoater).</p> <p>6.3.11 Exempt Compounds—Siloxanes: Exempt compounds that are cyclic, branched, or linear completely methylated siloxanes, shall be analyzed as exempt compounds for compliance with Section 6 by BAAQMD Method 43, "Determination of Volatile Methylsiloxanes in Solvent-Based Coatings, Inks, and Related Materials," <i>BAAQMD Manual of Procedures</i>, Volume III, adopted 11/6/96 (see Section 3, Volatile Organic Compound, and Section 6.3.1).</p> <p>6.3.12 Exempt Compounds—</p>	<p>test results will govern, except when an alternative method is approved as specified in Section 6.3.3. The District Air Pollution Control Officer (APCO) may require the manufacturer to conduct an EPA Method 24 analysis.</p> <p>6.3.3 Alternative Test Methods: Other test methods demonstrated to provide results that are acceptable for purposes of determining compliance with Section 6.3.2 +, after review and approved in writing by the staffs of the District, ARB and EPA, may also be used.</p> <p>6.3.4 Methacrylate Traffic Marking Coatings: Analysis of methacrylate multicomponent coatings used as traffic marking coatings shall be conducted according to a modification of EPA Method 24 (40 CFR 59, subpart D, Appendix A). This method has not been approved for methacrylate multicomponent coatings used for other purposes than as traffic marking coatings or for other classes of multicomponent coatings.</p> <p>6.3.5 Flame Spread Index: The flame spread index of a fire-retardant coating shall be determined by ASTM E84-07, "Standard Test Method for Surface Burning Characteristics of Building Materials" (see Section 3.0, Fire-Retardant Coating).</p> <p>6.3.6 Fire Resistance Rating: The fire resistance rating of a fire-resistive coating shall be determined by ASTM E119-07, "Standard Test Methods for Fire Tests of Building Construction Materials" (see Section 3.0, Fire-Resistive Coating).</p> <p>6.3.7 Gloss Determination: The gloss of a coating shall be determined by ASTM D523-89 (1999), "Standard Test Method for Specular Gloss" (see Section 3.0, Flat Coating, Nonflat Coating, Nonflat-High Gloss Coating and Quick-Dry Enamel).</p> <p>6.3.8 Metal Content of Coatings: The metallic content of a coating shall be determined by SCAQMD Method 318-95, Determination of Weight Percent Elemental Metal in Coatings by X-Ray Diffraction, <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i> (see Section 3.0, Metallic Pigmented Coating, Aluminum Roof Coating and Faux Finish).</p> <p>6.3.9 Acid Content of Coatings: The acid content of a coating shall be determined by ASTM D1613-06, "Standard Test Method for Acidity in Volatile Solvents and Chemical Intermediates Used in Paint, Varnish, Lacquer and related products" (see Section 3.0, Pre-Treatment Wash Primer).</p>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>Parachlorobenzotrifluoride (PCBTF): The exempt compound parachlorobenzotrifluoride, shall be analyzed as an exempt compound for compliance with Section 6 by BAAQMD Method 41, "Determination of Volatile Organic Compounds in Solvent Based Coatings and Related Materials Containing Parachlorobenzotrifluoride," <i>BAAQMD Manual of Procedures</i>, Volume III, adopted 12/20/95 (see Section 3, Volatile Organic Compound, and Section 6.3.1).</p> <p>6.3.13 Exempt Compounds: The content of compounds under U.S. EPA Method 24 shall be analyzed by SCAQMD Method 303-91 (Revised 1996), "Determination of Exempt Compounds," <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i> (see Section 3, Volatile Organic Compound, and Section 6.3.1).</p> <p>6.3.14 VOC Content of Coatings: The VOC content of a coating shall be determined by U.S. EPA Method 24 as it exists in appendix A of 40 <i>Code of Federal Regulations</i> (CFR) part 60, "Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings"(see Section 6.3.1).</p> <p>6.3.15 Alternative VOC Content of Coatings: The VOC content of coatings may be analyzed either by U.S. EPA Method 24 or SCAQMD Method 304-91 (Revised 1996), "Determination of Volatile Organic Compounds (VOC) in Various Materials," <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i> (see Section 6.3.1).</p> <p>6.3.16 Methacrylate Traffic Marking Coatings: The VOC content of methacrylate multicomponent coatings used as traffic marking coatings shall be analyzed by the procedures in 40 CFR part 59, subpart D, appendix A, "Determination of Volatile Matter Content of Methacrylate Multicomponent Coatings Used as Traffic Marking Coatings" (September 11, 1998) (see Section 6.3.3).</p>	<p>6.3.10 Drying Times: The set-to-touch, dry-hard, dry-to-touch and dry-to-recoat times of a coating shall be determined by ASTM D1640-95, "Standard Test Methods for Drying, Curing, or Film Formation of Organic Coatings at Room Temperature" (see Section 3.0, Quick-Dry Enamel and Quick-Dry Primer, Sealer and Undercoater) The tack-free time of a quick-dry enamel coating shall be determined by the Mechanical Test Method of ASTM D1640-95. (Category deleted effective January 1, 2011.)</p> <p>6.3.11 Surface Chalkiness: The chalkiness of a surface shall be determined using ASTM D4214-98, "Standard Test Methods for Evaluating the Degree of Chalking of Exterior Paint Films"(see Section 3, Specialty Primer, Sealer and Undercoater). (Category deleted effective January 1, 2011.)</p> <p>6.3.12 Exempt Compounds—Siloxanes: Exempt compounds that are cyclic, branched, or linear completely methylated siloxanes, shall be analyzed as exempt compounds for compliance with Section 6 by BAAQMD Method 43, "Determination of Volatile Methylsiloxanes in Solvent-Based Coatings, Inks, and Related Materials," <i>BAAQMD Manual of Procedures</i>, Volume III, adopted 11/6/96 (see Section 3.0, Volatile Organic Compound, and Section 6.3.2).</p> <p>6.3.13 Exempt Compounds—Parachlorobenzotrifluoride (PCBTF): The exempt compound parachlorobenzotrifluoride, shall be analyzed as an exempt compound for compliance with Section 6 by BAAQMD Method 41, "Determination of Volatile Organic Compounds in Solvent Based Coatings and Related Materials Containing Parachlorobenzotrifluoride," <i>BAAQMD Manual of Procedures</i>, Volume III, adopted 12/20/95 (see Section 3.0, Volatile Organic Compound, and Section 6.3.2).</p> <p>6.3.14 Exempt Compounds: The content of compounds under U.S. EPA Method 24 shall be analyzed by SCAQMD Method 303-91 (Revised 1993), "Determination of Exempt Compounds," <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i> (see Section 3.0, Volatile Organic Compound, and Section 6.3.2).</p> <p>6.3.15 VOC Content of Coatings: The VOC content of a coating shall be determined by EPA Method 24 as it exists in appendix A of 40 <i>Code of</i></p>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
		<p><i>Federal Regulations</i> (CFR) part 60, "Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings" (see Section 6.3.2).</p> <p>6.3.16 Alternative VOC Content of Coatings: The VOC content of coatings may be analyzed either by U.S. EPA Method 24 or SCAQMD Method 304-91 (Revised 1996), "Determination of Volatile Organic Compounds (VOC) in Various Materials," <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i>.</p> <p>6.3.17 Methacrylate Traffic Marking Coatings: The VOC content of methacrylate multicomponent coatings used as traffic marking coatings shall be analyzed by the procedures in 40 CFR part 59, subpart D, appendix A, "Determination of Volatile Matter Content of Methacrylate Multicomponent Coatings Used as Traffic Marking Coatings" (September 11, 1998).</p> <p>6.3.18 Hydrostatic Pressure for Basement Specialty Coatings: The hydrostatic pressure resistance for basement specialty coatings shall be analyzed using ASTM D7088-04, "Standard Practice for Resistance to Hydrostatic Pressure for Coatings Used in Below Grade Applications Applied to Masonry".</p> <p>6.3.19 Tub and Tile Refinish Coating Adhesion: The adhesion of tub and tile coating shall be determined by ASTM D4585-99, "Standard Practice for Testing Water Resistance of Coatings Using Controlled Condensation" and ASTM D3359-02, "Standard Test Methods for Measuring Adhesion by Tape Test".</p> <p>6.3.20 Tub and Tile Refinish Coating Hardness: The hardness of tub and tile refinish coating shall be determined by ASTM D3363-05, "Standard Test Method for Film Hardness by Pencil Test".</p> <p>6.3.21 Tub and Tile Refinish Coating Abrasion Resistance: Abrasion resistance of tub and tile refinish coating shall be analyzed by ASTM D4060-07, "Standard Test Methods for Abrasion Resistance of Organic Coatings by the Taber Abraser".</p> <p>6.3.22 Tub and Tile Refinish Coating Water Resistance: Water resistance of tub and tile refinish coatings shall be determined by ASTM D4585-99, "Standard Practice for Testing Water Resistance of Coatings Using Controlled Condensation" and ASTM D714-02e1, "Standard Test Method</p>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
		<p>for Evaluating Degree of Blistering of Paints".</p> <p>6.3.23 Waterproofing Membrane: Waterproofing membrane shall be tested by ASTM C836-06, "Standard Specification for High Solids Content, Cold Liquid-Applied Elastomeric Waterproofing Membrane for Use with Separate Wearing Course".</p> <p>6.3.24 Mold and Mildew Growth for Basement Specialty Coatings: Mold and mildew growth resistance for basement specialty coatings shall be determined by ASTM D3273-00, "Standard Test Method for Resistance to Growth of Mold on the Surface of Interior Coatings in an Environmental Chamber" and ASTM D3274-95, "Standard Test Method for Evaluating Degree of Surface Disfigurement of Paint Films by Microbial (Fungal or Algal) Growth or Soil and Dirt Accumulation".</p> <p>6.3.25 Reactive Penetrating Sealer Water Repellency: Reactive penetrating sealer water repellency shall be analyzed by ASTM C67-07, "Standard Test Methods for Sampling and Testing Brick and Structural Clay Tile"; or ASTM C97-02, "Standard Test Methods for Absorption and Bulk Specific Gravity of Dimension Stone"; or ASTM C140-06, "Standard Test Methods for Sampling and Testing Concrete Masonry Units and Related Units".</p> <p>6.3.26 Reactive Penetrating Sealer Water Vapor Transmission: Reactive penetrating sealer water vapor transmission shall be analyzed ASTM E96/E96M-05, "Standard Test Method for Water Vapor Transmission of Materials".</p> <p>6.3.27 Reactive Penetrating Sealer - Chloride Screening Applications: Reactive penetrating sealers shall be analyzed by National Cooperative Highway Research Report 244 (1981), "Concrete Sealers for the Protection of Bridge Structures".</p> <p>6.3.28 Stone Consolidants: Stone consolidants shall be tested using ASTM E2167-01, "Standard Guide for Selection and Use of Stone Consolidants".</p>	
7.0 Compliance Schedule	Persons subject to this rule shall be in compliance with this rule by October 31, 2001.	Persons subject to this rule shall be in compliance with this rule by the dates specified within the rule.	No change in the requirements, therefore, non-SIP version of rule is as stringent as SIP version.
8.0 Averaging Compliance Option	8.1 On or after January 1, 2003, in lieu of compliance with the specified limits in the Table of Standards for floor coatings; industrial maintenance coatings; primers, sealers, and undercoaters; quick-dry primers, sealers, and undercoaters; quick-dry enamels; roof coatings; rust		No change in the requirements, therefore, non-SIP version of rule is as stringent as SIP version.

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>preventative coatings; stains; waterproofing sealers, as well as flats and non-flats (excluding recycled coatings), manufacturers may average designated coatings such that their actual cumulative emissions from the averaged coatings are less than or equal to the cumulative emissions that would have been allowed under those limits over a compliance period not to exceed one year. Such manufacturers must also comply with the averaging provisions contained in this Section, as well as maintain and make available for inspection records for at least three years after the end of the compliance period. This Section shall cease to be effective on January 1, 2005, after which averaging will no longer be allowed.</p> <p>Per Section 8.1, averaging is no longer applicable. Therefore, Section 8.2 through 8.14 are not listed.</p>		

District Rule 4601 was amended (12/17/2009). As analyzed, each amended section of the non-SIP version of the rule is at least as stringent as, or more stringent than the corresponding section of the SIP version of the rule. Therefore, it is concluded that overall the non-SIP version of the rule is more stringent than the SIP version of the rule.

Attachment F

Material Safety Data Sheet for the Facility Applied Coating

M A T E R I A L S A F E T Y D A T A S H E E T

681 C.B.C. QUICK DRY RED PRIMER

Page: 1

PRODUCT NAME: 681 C.B.C. QUICK DRY RED PRIMER
 PRODUCT CODE: 681 QDRO

HMIS CODES: H F R P
 2 3 0 H

===== SECTION I - MANUFACTURER IDENTIFICATION =====

MANUFACTURER'S NAME: CONTRACT COATINGS MFG. INC.
 ADDRESS : 2211 Navy Drive

Stockton, CA. 95206

EMERGENCY CALL CHEMTREC LISTED BELOW

EMERGENCY PHONE : 1-800-424-9300

DATE PRINTED : 02/01/01

INFORMATION PHONE : 209-463-0914

NAME OF PREPARER : A. L. CURADO

===== SECTION II - HAZARDOUS INGREDIENTS/SARA III INFORMATION =====

REPORTABLE COMPONENTS	CAS NUMBER	VAPOR PRESSURE		WEIGHT PERCENT
		mm Hg @ TEMP		
TALC	14807-96-6	N/A	N/A	43.20
ALKYD RESIN SOLUTION	MIXED	6.63	68F	22.83
ACETONE KETONE	67-64-3	185mmHg	68 F	15
* AROMATIC PETROLRUM DISTILLATES	64742-93-6	3.mmHg	68F	5.71
* ALKYD RESIN SOLUTION	MIXED	2.40	68F	3.45
* ETHYLENE GLYCOL MONOBUTYL ETHER	111-76-2	.660	60.00 F	2.35
MINERAL SPIRITS, LIRCONIUM 2-ETHYLHEXANOATE/NEODECANOTE MIXTURE	8052-41-3	6mmHg	68 F	0.63
ALKYL QUATERNARY AMMONIUM BENTONITE	68953-58-2	N/A	N/A	
MANGANESE 2-ETHYLHEXANOATE/NBODECANOTE MIXTURE/DIETHYLENE GLYCOL	8052-41-3	7mmHg	68F	0.29
METHYL ETHYL KETOXIMENE	96-29-7	2.0	68 F	0.16
METHYL ALCOHOL	67-56-1	21.7	68.F	0.16

* Indicates toxic chemical(s) subject to the reporting requirements of section 313 of Title III and of 40 CFR 372.

WARNING, as required by PROP 65: Detectable amounts of a chemical known to the state of California to cause cancer, birth defects, or other reproduction harm maybe present.

===== SECTION III - PHYSICAL/CHEMICAL CHARACTERISTICS =====

BOILING RANGE: 133 F - 336F SPECIFIC GRAVITY (H2O=1): 1.41
 VAPOR DENSITY: HEAVIER THAN AIR. EVAPORATION RATE: SLOWER THAN ETHER.
 COATING V.O.C.: 2.17 lb/gl MATERIAL V.O.C.: 1.67 lb/gl
 SOLUBILITY IN WATER: NON SOLUBLE.
 APPEARANCE AND ODOR: MILD AROMATIC ODOR, OPAQUE PIGMENTED LIQUID.

===== SECTION IV - FIRE AND EXPLOSION HAZARD DATA =====

FLASH POINT: -4 F METHOD USED: TCC
 FLAMMABLE LIMITS IN AIR BY VOLUME- LOWER: .8 UPPER: 36.

EXTINGUISHING MEDIA: FOAM, ALCOHOL FOAM, CO2, DRY CHEMICAL, WATER FOG. WATER MAY BE USED TO COOL DOWN DRUMS EXPOSED TO HEAT.

SPECIAL FIREFIGHTING PROCEDURES

RESPIRATORY EQUIPMENT SHOULD BE WORN TO AVOID INHALATION OF FUMES.

UNUSUAL FIRE AND EXPLOSION HAZARDS

HANDLE AS FLAMMABLE LIQUID, VAPORS MAY FORM AN EXPLOSIVE MIXTURE.

===== SECTION V - REACTIVITY DATA =====

M A T E R I A L S A F E T Y D A T A S H E E T

681 C.B.C. QUICK DRY RED PRIMER

**STABILITY: STABLE
CONDITIONS TO AVOID**

EXCESSIVE HEAT, POOR VENTILATION, CORROSIVE ATMOSPHERE.

INCOMPATIBILITY (MATERIALS TO AVOID)

ALKALINE MATERIALS, STRONG ACIDS, AND OXIDIZING WATER.

HAZARDOUS DECOMPOSITION OR BYPRODUCTS

CARBON MONOXIDE, CARBON DIOXIDE AND OXIDES OF NITROGEN.

HAZARDOUS POLYMERIZATION: WILL NOT OCCUR

===== SECTION VI - HEALTH HAZARD DATA =====

INHALATION HEALTH RISKS AND SYMPTOMS OF EXPOSURE

MAY CAUSE DIZZINESS, BREATHING DIFFICULTY, AND/OR HEADACHES.

SKIN AND EYE CONTACT HEALTH RISKS AND SYMPTOMS OF EXPOSURE

SKIN: OVEREXPOSURE CAN CAUSE SENSITIZATION AND REDNESS OF AFFECTED AREAS.

EYE: SEVERE IRRITATION WILL CAUSE TEARING, REDNESS AND PUFFINESS IF SYMPTOMS PERSIST SEEK MEDICAL ATTENTION IMMEDIATELY.

SKIN ABSORPTION HEALTH RISKS AND SYMPTOMS OF EXPOSURE

SKIN: MAY CAUSE IRRITATION, REDNESS, OR BLISTERS. IF SYMPTOMS PERSIST SEEK MEDICAL ATTENTION IMMEDIATELY.

INGESTION HEALTH RISKS AND SYMPTOMS OF EXPOSURE

IF SWALLOWED, CALL A PHYSICIAN IMMEDIATELY, BUT DO NOT INDUCE VOMITING. DO NOT GIVE ANYTHING BY MOUTH TO AN UNCONSCIOUS OR CONVULSING PERSON.

HEALTH HAZARDS (ACUTE AND CHRONIC)

NONE.

CARCINOGENICITY: NTP CARCINOGEN: No IARC MONOGRAPHS: No OSHA REGULATED: Yes
N/A

MEDICAL CONDITIONS GENERALLY AGGRAVATED BY EXPOSURE

N/A

EMERGENCY AND FIRST AID PROCEDURES

INHALATION: REMOVE PERSON TO FRESH AIR. IF UNCONSCIOUS APPLY CPR. SEEK MEDICAL ATTENTION IMMEDIATELY.

SKIN: WASH AFFECTED AREAS WITH PLENTY OF WARM SOAPY WATER. IF SEVERE, SEEK MEDICAL ATTENTION.

EYES: FLUSH EYES WITH PLENTY OF CLEAN WATER. SEEK MEDICAL ATTENTION.

===== SECTION VII - PRECAUTIONS FOR SAFE HANDLING AND USE =====

STEPS TO BE TAKEN IN CASE MATERIAL IS RELEASED OR SPILLED

DYKE SPILLS WITH SAND OR SUITABLE ABSORBANT MATERIAL. SOAK UP EXCESS MATERIAL WITH APPROVED ABSORBANT. SHOVEL CONTAMINATED ABSORBANT INTO SUITABLE CONTAINERS AND WIPE UP WITH CLEAN RAGS. PLACE SOILED RAGS IN A CONTAINER WITH WATER. FLDSEK AREA WITH AMPLE WATER. DISPOSE OF SOILED RAGS AND OTHER WASTE MATERIAL IN ACCORDANCE WITH FEDERAL, STATE, AND LOCAL REGULATIONS.

WASTE DISPOSAL METHOD

DISPOSE OF WASTE IN ACCORDANCE WITH STATE, FEDERAL AND LOCAL REQUIREMENTS.

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORING

STORE CONTAINERS IN A COOL DRY PLACE, KEEP TIGHTLY CLOSED, DO NOT EXPOSE THEM TO HEAT, SPARKS OR OPEN FLAME, NEVER CUT EMPTY DRUMS WITH A CUTTING TORCH.

M A T E R I A L S A F E T Y D A T A S H E E T
581 C.B.C. QUICK DRY RED PRIMER

OTHER PRECAUTIONS

PROTECT ALL BARE SKIN AREAS WITH SUITABLE ATTIRE.

===== SECTION VIII - CONTROL MEASURES =====

RESPIRATORY PROTECTION

USE NIOSH APPROVED CARBON FILTERED RESPIRATOR OR DUST PROOF MASK.

VENTILATION

PROVIDE GOOD GENERAL MECHANICAL VENTILATION AND EXHAUST AS REQUIRED.

PROTECTIVE GLOVES

WEAR APPROVED COTTON WORKMANS GLOVES.

EYE PROTECTION

WEAR SPLASH PROOF SAFETY GOGGLES.

OTHER PROTECTIVE CLOTHING OR EQUIPMENT

WEAR SPLASH PROOF APRON, COTTON WORKMANS GLOVES SHOULD ALSO BE WORN.

WORK/HYGIENIC PRACTICES

ALWAYS WORK IN WELL VENTILATED AREA WITH PROPER SAFETY EQUIPMENT FOR SPECIFIC APPLICATIONS.

===== SECTION IX - DISCLAIMER =====

THE INFORMATION CONTAINED HEREIN IS BASED ON THE LATEST AVAILABLE SOURCES.

IT IS BELIEVED TO BE ACCURATE AND IS OFFERED IN GOOD FAITH. NO WARRANTY EXPRESSED OR IMPLIED IS HEREBY MADE. THE RECOMMENDED INDUSTRIAL HYGIENE AND SAFE HANDLING PROCEDURES ARE BELIEVED TO BE GENERALLY APPLICABLE. HOWEVER, EACH USER SHOULD REVIEW THESE RECOMMENDATIONS IN THE SPECIFIC CONTEXT OF THE INTENDED USE AND DETERMINE WHETHER THEY ARE APPROPRIATE.