



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT



HEALTHY AIR LIVING™

DEC 04 2012

Jaime Rodriguez
Deuel Vocational Institution
P O Box 400
Tracy, CA 95378-0400

RE: Notice of Final Action - Authority to Construct
Project Number: N-1122501

Dear Mr. Rodriguez:

The Air Pollution Control Officer has issued Authority to Construct permits to Deuel Vocational Institution for the modification to an existing wood products coating operation and the permitting of a motor vehicle and mobile equipment coating operation, located at 23500 Kasson Road, Tracy. Enclosed are copies of the Authority to Construct permits and a copy of the notice of final action to be published approximately three days from the date of this letter.

Notice of the District's preliminary decision to issue this Authority to Construct was published on October 16, 2012. The District's analysis of the proposal was also sent to CARB on October 11, 2012. All comments received following the District's preliminary decision on this project were considered.

Comments received by the District during the public notice period resulted in a modification to the PM10 emissions limit on ATC permit N-283-40-0 to match the PM10 emissions limit calculated in the application review. These changes were minor and did not trigger additional public notification requirements, nor did they have any impact upon the Best Available Control Technology determination or on the amount of offsets required for project approval.

Also enclosed is an invoice for the engineering evaluation fees pursuant to District Rule 3010. Please remit the amount owed, along with a copy of the attached invoice, within 60 days.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Rupi Gill at (209) 557-6400.

Sincerely,

David Warner
Director of Permit Services

DW:FJC/st

Enclosure

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



DEC 04 2012

Mike Tollstrup, Chief
Project Assessment Branch
Stationary Source Division
California Air Resources Board
PO Box 2815
Sacramento, CA 95812-2815

RE: Notice of Final Action - Authority to Construct
Project Number: N-1122501

Dear Mr. Tollstrup:

Thank you for your comments on the above project. Following are the District's specific responses to your comments:

Comment:

The PM10 emissions limit on Draft Authority to Construct (ATC) N-283-40-0 was listed as 3.6 lb-PM10 per day when the PM10 emissions limit calculated in the application review was 1.8 lb-PM10 per day.

District response:

The PM10 emissions limit on the final ATC permit was changed to 1.8 lb-PM10 per day to reflect the correct emissions limit.

The Air Pollution Control Officer has issued Authority to Construct permits to Deuel Vocational Institution for the modification to an existing wood products coating operation and the permitting of a motor vehicle and mobile equipment coating operation, located at 23500 Kasson Road, Tracy.

Enclosed are copies of the Authority to Construct permits and a copy of the notice of final action to be published approximately three days from the date of this letter.

We trust that the above response satisfies your concerns and appreciate your concurrence on this project. On the other hand, if you disagree with the District's position, we would appreciate your prompt response detailing your concerns.

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

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Mr. Mike Tollstrup
Page 1

If you have any questions, regarding the above response, or require additional clarification, please contact Mr. Fred Cruz of Permit Services at (209) 557-6456 contact Mr. .

Sincerely,

A handwritten signature in black ink, appearing to read "D. Warner", with a long horizontal flourish extending to the right.

David Warner
Director of Permit Services

DW:FJC/st

Enclosures

Stockton Record

**NOTICE OF FINAL ACTION
FOR THE ISSUANCE OF AUTHORITY
TO CONSTRUCT PERMITS**

NOTICE IS HEREBY GIVEN that the Air Pollution Control Officer has issued Authority to Construct permits to Deuel Vocational Institution for the modification to an existing wood products coating operation and the permitting of a motor vehicle and mobile equipment coating operation, located at 23500 Kasson Road, Tracy.

All comments received following the District's preliminary decision on this project were considered.

Comments received by the District during the public notice period resulted in a modification to the PM10 emissions limit on ATC permit N-283-40-0 to match the PM10 emissions limit calculated in the application review. These changes were minor and did not trigger additional public notification requirements, nor did they have any impact upon the Best Available Control Technology determination or on the amount of offsets required for project approval.

The application review for Project #N-1122501 is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and the **SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT, .**



AUTHORITY TO CONSTRUCT

PERMIT NO: N-283-33-1

ISSUANCE DATE: 11/27/2012

LEGAL OWNER OR OPERATOR: DEUEL VOCATIONAL INSTITUTE
MAILING ADDRESS: PO BOX 400
TRACY, CA 95378

LOCATION: 23500 KASSON RD
TRACY, CA 95378

EQUIPMENT DESCRIPTION:

MODIFICATION TO ESTABLISH A COMBINED ANNUAL VOC EMISSIONS LIMIT OF 14,235 LBS WITH PERMIT UNIT N-283-40-0. WOOD PARTS AND PRODUCTS COATING OPERATION WITH A SPRAY TECH OPEN-FACE SPRAY BOOTH.

CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. 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]
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]
5. The exhaust fan shall be turned on prior to the start of wood products coating operations. [District Rule 2201]
6. PM10 emissions shall not exceed 7.8 pounds per day. [District Rule 2201]
7. VOC emissions shall not exceed 39.0 pounds per day. [District Rule 2201]
8. Combined VOC emissions from permit units N-283-33 and N-283-40 shall not exceed 14,235 lbs during any one rolling 12-month period. [District Rule 2201]
9. VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: clear topcoat 275 g/l (2.3 lb/gallon), filler 275 g/l (2.3 lb/gallon), high-solids stains 240 g/l (2.0 lb/gallon), ink 500 g/l (4.2 lb/gallon), mold-seal coating 750 g/l (6.3 lb/gallon), multi-colored coating 275 g/l (2.3 lb/gallon), pigmented coating 275 g/l (2.3 lb/gallon), sanding sealer 275 g/l (2.3 lb/gallon). [District Rule 4606]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director, APCO

DAVID WARNER, Director of Permit Services

N-283-33-1; Nov 27 2012; JAM - CRUZ; Unit Inspection NOT Required

10. VOC content of materials for wood products, as applied, shall not exceed any of the following limits: low-solids stain 120 g/l (1.0 lb/gallon), stripper 350 g/l (2.9 lb/gallon). [District Rule 4606]
11. VOC content of strippable booth coating shall not exceed 450 g/l (3.8 lb/gallon) as applied, excluding water and exempt compounds. [District Rule 4606]
12. Only HVLP, electrostatic, brush, dip, flow, or roll coating application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4606]
13. Permittee shall demonstrate that HVLP guns manufactured prior to 1/1/96 operate between 0.1 and 10 psig air atomizing pressure, by manufacturer's published technical material or by use of a certified air pressure tip gauge. [District Rule 4606]
14. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal), repair and maintenance cleaning: 25 g/l (0.21 lb/gal), and cleaning of coating application equipment: 25 g/l (0.21 lb/gal). [District Rule 4606]
15. An operator shall store or dispose of fresh or spent solvents, waste solvent cleaning material such as cloth, paper, etc, coating, adhesives, catalysts, and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4606]
16. Permittee shall maintain daily records of the following: quantity and type of coatings and solvents used, mix ratios (by volume) of components added to each coating, volume of coatings applied, VOC content of each coating as applied, and VOC content of each solvent or stripper. [District Rule 4606]
17. Permittee shall keep the following records for solvent cleaning activities: manufacturers product data sheet or MSDS of solvents used, VOC content of solvents in g/l or lb/gal, and the type of cleaning activity for which each solvent is used. [District Rule 4606]
18. The permittee shall maintain daily records of the PM10 and VOC emissions from this coating operation. [District Rule 2201]
19. The permittee shall maintain records of the combined VOC emissions from permit units N-283-33 and N-283-40, on a rolling 12-month basis. These records shall be updated at least monthly. [District Rule 2201]
20. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 2201 and 4606]



AUTHORITY TO CONSTRUCT

PERMIT NO: N-283-40-0

ISSUANCE DATE: 11/27/2012

LEGAL OWNER OR OPERATOR: DEUEL VOCATIONAL INSTITUTE
MAILING ADDRESS: PO BOX 400
TRACY, CA 95378

LOCATION: 23500 KASSON RD
TRACY, CA 95378

EQUIPMENT DESCRIPTION:
MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATION SERVED BY AN ENCLOSED PAINT SPRAY BOOTH WITH DRY EXHAUST FILTERS AND HVLP SPRAY GUNS.

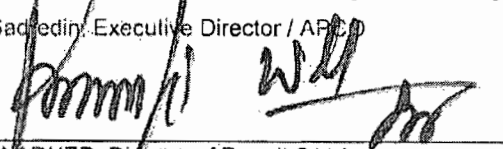
CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
3. 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]
4. Booth shall be equipped with dry filters achieving a PM10 capture efficiency of at least 95% by weight. [District Rule 2201]
5. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]
6. VOC emissions from this coating operation shall not exceed 54.7 pounds in any one day. [District Rule 2201]
7. Particulate matter (PM10) emission rate shall not exceed 1.8 lb/day. [District Rule 2201]
8. Combined VOC emissions from permit units N-283-33 and N-283-40 shall not exceed 14,235 lbs during any one 12-month rolling period. [District Rule 2201]
9. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rules 2201 4102]
10. The exhaust stack shall measure at least 26 feet from ground level. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans/specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Saadedin, Executive Director / APD


DAVID WARNER, Director of Permit Services

N-283-40-0 Nov 27 2012 5:27 AM - CJM/MP Joint Inspection NOT Required

11. No coatings, solvents, or additives containing chromium compounds shall be used. [District Rule 4102]
12. No coatings, solvents, or additives containing lead compounds shall be used. [District Rule 4102]
13. No coatings, solvents, or additives containing cadmium compounds shall be used. [District Rule 4102]
14. No coatings, solvents, or additives containing nickel compounds shall be used. [District Rule 4102]
15. The application of coatings shall be conducted in booth with filters in place, fan(s) operating, and doors closed. [District Rule 2201]
16. Only high-volume low-pressure (HVLP) spray equipment, electrostatic, brush, dip, or roll coating application equipment, or other application equipment approved by the District in writing, shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4612]
17. If an HVLP spray gun is used, the operator must demonstrate that the spray gun operates between 0.1 and 10 pounds per square inch, gauge, (psig) air atomizing pressure, measured dynamically at the center of the air cap and at the air horns. For a gun permanently labeled HVLP by the manufacturer, a satisfactory demonstration shall either be in the form of manufacturer's published technical information or by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer of the gun. For a gun not permanently labeled HVLP by the manufacturer, a satisfactory demonstration shall be based on manufacturer's published technical material and by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer of the gun. [District Rule 4612]
18. All fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners shall be stored in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4612]
19. For solvent cleaning operations other than for bug and tar removal, the permittee shall not use solvents that have VOC content greater than 25 g/l (0.21 lb/gal) of cleaning material. [District Rule 4612]
20. For bug and tar removal, the permittee shall not use any material other than bug and tar remover regulated under the Consumer Products Regulation (California Code of Regulations Section 94507 et seq.). [District Rule 4612]
21. The VOC Regulatory content of coatings, as applied shall not exceed any of the following limits: adhesion promoter 540 g/l (4.5 lb/gal), clear coating 250 g/l (2.1 lb/gal), color coating 420 g/l (3.5 lb/gal), multi-color coating 680 g/l (5.7 lb/gal), pretreatment coating 660 g/l (5.5 lb/gal), primer 250 g/l (2.1 lb/gal), primer sealer 250 g/l (2.1 lb/gal), single-stage coating 340 g/l (2.8 lb/gal), temporary protective coating 60 g/l (0.5 lb/gal), truck bed lining coating 310 g/l (2.6 lb/gal), underbody coating 430 g/l (3.6 lb/gal), uniform finish coating 540 g/l (4.5 lb/gal), and any other coating type 250 g/l (2.1 lb/gal). The VOC Regulatory content for coatings shall be defined as the VOC in grams per liter of coating (or pounds per gallon of coating), excluding water and exempt compounds. [District Rules 2201 and 4612]
22. The permittee shall maintain and have available at all times the following: a current list of all coatings used that includes the material name and manufacturer, application method, coating type and mix ratio specific to the coating, and the VOC Actual for Coatings and VOC Regulatory for Coatings as applied; current manufacturer specification sheets, material safety data sheets (MSDS), technical data sheets, or air quality data sheets, which list the VOC Actual for Coatings and VOC Regulatory for Coatings of each ready-to-spray coating and automotive coating components; and purchase records identifying the coating type, name, and volume of coatings bought. [District Rule 4612]
23. The permittee shall maintain records that include: (a) Date; (b) Description of the item(s) coated; (c) Amount of each coating and solvent used (in gallons); and (d) Amount of VOC and PM10 emitted, in pounds per day, from this coating operation. [District Rule 2201]
24. The permittee shall maintain records of the combined VOC emissions from permit units N-283-33 and N-283-40, on a rolling 12-month basis. These records shall be updated at least monthly. [District Rule 2201]
25. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 2201 and 4606]