



JUN 29 2015

Mr. Les Clark Fineline Industries, Inc. 455 Grogan Avenue Merced, CA 95341

Re: Notice of Preliminary Decision – Title V Permit Renewal

**District Facility # N-1246** Project # N-1141250

Dear Mr. Clark:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Fineline Industries, Inc. at 455 Grogan Avenue, Merced, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. After addressing all comments made during the 30-day public notice and the 45-day EPA comment periods, the District intends to issue the renewed Federally Mandated Operating Permit. Please submit your written comments on this project within the 30-day public comment period, as specified in the enclosed public notice.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Nick Peirce, Permit Services Manager, at (209) 557-6400.

Sincerely.

rnaud Mariollet

Director of Permit Services

AM/kc

**Enclosures** 

Mike Tollstrup, CARB (w/enclosure) via email CC:

Gerardo C. Rios, EPA (w/enclosure) via email CC:

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

## SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT

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

### **TABLE OF CONTENTS**

1.	PROPOSAL	.2
11.	FACILITY LOCATION	.3
111.	EQUIPMENT LISTING	.3
IV.	GENERAL PERMIT TEMPLATE USAGE	.3
V.	SCOPE OF EPA AND PUBLIC REVIEW	4
VI.	FEDERALLY ENFORCEABLE REQUIREMENTS	5
VII.	REQUIREMENTS NOT FEDERALLY ENFORCEABLE	6
VIII.	PERMIT REQUIREMENTS.	7
X.	PERMIT SHIELD1	2
Χ.	PERMIT CONDITIONS1	3
XI.	ATTACHMENTS1	3
А. В.	DRAFT RENEWED TITLE V OPERATING PERMIT PREVIOUS TITLE V OPERATING PERMIT	
C.	DETAILED FACILITY LIST	

#### TITLE V PERMIT RENEWAL EVALUATION

#### Fiberglass Boat Manufacturing

Engineer: Kai Chan

Date: June 23, 2015

Facility Number: N-1246

Facility Name: Fineline Industries, Inc. Mailing Address: 455 Grogan Avenue

Merced, CA 95341

Contact Name: Les Clark

Phone: (209) 384-0255

Email: LClark@finelineind.com

Responsible Official: Les Clark

Title: Vice President of Manufacturing

Project #: N-1141250

Deemed Complete: April 11, 2014

#### I. PROPOSAL

Fineline Industries, Inc. was issued a Title V permit renewal on November 4, 2010. As required by District Rule 2520, the applicant is requesting a permit renewal. The existing Title V permit shall be reviewed and modified to reflect all applicable District and federal rules updated, removed, or added since the issuance of the initial Title V permit.

Fineline Industries, Inc. received Authority to Construct (ATC) permit N-1246-3-4 for the modification of their fiberglass boat grinding operation. This ATC permit constitutes a minor modification to the facility's Title V permit. The proposed modification will be incorporated into the Title V operating permit within this Title V renewal project.

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

#### II. FACILITY LOCATION

Fineline Industries Inc. is located at 455 Grogan Avenue in Merced, CA.

#### III. EQUIPMENT LISTING

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

#### IV. GENERAL PERMIT TEMPLATE USAGE

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

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

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

The following applicable requirements have been addressed by the general permit facility wide umbrella Template SJV-UM-03, which have not been updated since the previous Title V renewal, and will not be discussed in this document:

- District Rule 1100, <u>Equipment Breakdown</u> (amended December 17, 1992)
- District Rule 1160, <u>Emission Statements</u> (adopted November 18, 1992)
- District Rule 2010, Permits Required (amended December 17, 1992)
- District Rule 2031, <u>Transfer of Permits</u> (amended December 17, 1992)
- District Rule 2040, <u>Applications</u> (amended December 17, 1992)
- District Rule 2070, <u>Standards for Granting Applications</u>. (amended December 17, 1992)

- District Rule 2080, <u>Conditional Approval</u> (amended December 17, 1992)
- District Rule 2520, <u>Federally Mandated Operating Permits</u> (amended June 21, 2001)
- District Rule 4101, <u>Visible Emissions</u> (amended February 17, 2005)
- District Rule 4601, <u>Architectural Coatings</u>
   (amended October 31, 2001 ⇒ amended December 17, 2009)
- District Rule 8021, <u>Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities</u>
   (adopted November 15, 2001 ⇒ amended August 19, 2004)
- District Rule 8031, <u>Bulk Materials</u>

   (adopted November 15, 2001 ⇒ amended August 19, 2004)
- District Rule 8041, <u>Carryout and Trackout</u> (adopted November 15, 2001 ⇒ amended August 19, 2004)
- District Rule 8051, <u>Open Areas</u>
   (adopted November 15, 2001 ⇒ amended August 19, 2004)
- District Rule 8061, <u>Paved and Unpaved Roads</u>
   (adopted November 15, 2001 ⇒ amended August 19, 2004)
- District Rule 8071, <u>Unpaved Vehicle/Equipment Traffic Areas</u> (adopted November 15, 2001 ⇒ amended September 16, 2004)
- 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos (amended July 20, 2004)

#### V. SCOPE OF EPA AND PUBLIC REVIEW

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

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

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

Conditions 1-41 of the facility-wide requirements N-1246-0-2 have been subsumed by conditions 1-42 of the facility-wide requirements N-1246-0-3.

#### VI. FEDERALLY ENFORCEABLE REQUIREMENTS

#### A. Rules Updated

- District Rule 2020, <u>Exemptions</u>
   (amended December 20, 2007 ⇒ amended December 18, 2014)
- District Rule 2201, New and Modified Stationary Source Review Rule (amended December 18, 2008 ⇒ amended April 21, 2011)
- District Rule 4684, <u>Polyester Resin Operations</u>
   (amended September 17, 2009 ⇒ amended August 18, 2011)
- 40 CFR Part 82, Subpart B, <u>Servicing of Motor Vehicle Air Conditioners</u> (amended June 25, 2013)
- 40 CFR Part 82, Subpart F, Recycling and Emissions Reduction (amended April 10, 2015)

#### B. Rules Removed

There are no applicable rules that were removed since the previous Title V renewal.

#### C. Rules Added

 District Rule 2410, <u>Prevention of Significant Deterioration</u> (adopted June 16, 2011, effective November 26, 2012)

#### D. Rules Not Updated

- District Rule 4201, <u>Particulate Matter Concentration</u> (amended December 17, 1992)
- District Rule 4202, <u>Particulate Matter Emission Rate</u> (amended December 17, 1992)
- 40 CFR Part 63, Subpart VVVV, <u>National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing</u> (amended October 3, 2001)
- 40 CFR Part 64, <u>Compliance Assurance Monitoring (CAM)</u> (amended October 22, 1997)

#### VII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

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

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

#### A. Rules Updated

There are no applicable rules that have been updated since the previous Title V renewal.

#### B. Rules Added

There are no applicable rules added since the previous Title V renewal.

#### C. Rules Not Updated

- District Rule 1070, <u>Inspections</u> (amended December 17, 1992)
- District Rule 4102, <u>Nuisance</u> (amended December 17, 1992)

#### VIII. PERMIT REQUIREMENTS

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

#### A. District Rule 2020 - Exemptions

District Rule 2020 lists source categories that may be exempt from obtaining permits, and specifies recordkeeping requirements to verify such exemptions. The amendments to this rule do not have any effect on current permit requirements and will therefore not be addressed in this evaluation. Condition 5 of permit N-1246-0-3 will ensure on-going compliance with this rule.

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

District Rule 2201 was amended on April 21, 2011, after this facility's Title V permit was last renewed. This Title V permit renewal does not constitute a modification per section 3.25, defined as an action including at least one of the following items:

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

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

#### C. District Rule 2401 - Prevention of Significant Deterioration

This rule was added on June 16, 2011 and became effective on November 26, 2012. This Title V renewal is not a PSD modification; therefore, it is not necessary to update the permits to address this rule.

#### D. District Rule 4684 - Polyester Resin Operations

The purpose of this rule is to reduce emissions of volatile organic compounds (VOC) from polyester resin operations, fiberglass boat manufacturing operations and the organic solvent cleaning, and the storage and disposal of solvents and waste solvent material assoicated with such operations.

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

This facility is a fiberglass boat manufacturing operation and the following permits are subject to this rule:

Permit Number N-1246-1-4 (Gel Coat Operation Served by Spray Booth #1 (Bleeker Bros. Standard F-20-7, 3HP)):

Permit Number N-1246-2-4 (Gel Coat Operation Served by Spray Booth #2 (Bleeker Bros. Standard F-20-7, 3HP)):

Permit Number N-1246-8-1 (Fiberglass Lamination Operation Utilizing Open Molds with Manual Resin Application (Hand Layup) and Mechanical Non-Atomized Resin Application with Fluid Impingement Technology (FIT) Chopper Guns (Spray Layup) for the Manufacturing of Boat Bodies):

The following table outlines the requirements along with the permit conditions to ensure compliance with this rule for these permit units:

District Rule 4684 Requirements	Method of Compliance and Permit Condition Numbers for Compliance			
Section 5.1 is applicable to all polyester resin operations except fiberglass boat manufacturing operations.	This facility manufactures fiberglass boats. Thus, Section 5.1 requirements are not applicable.			
Section 5.2.1 lists the requirements for closed molding processes used for the manufacturing of fiberglass boats.	This operation does not use a closed molding process. Thus, Section 5.2.1 requirements are not applicable.			
Section 5.2.2.1 states that this operation must comply with one of the compliance options in Section 5.2.2.4 through 5.2.2.6 and the applicable requirements of Sections 5.3, 5.4 and 6.0.	The applicant will comply with the compliance option listed in Section 5.2.2.4 and with the applicable requirements of Sections 5.3, 5.4, and 6.0.			
Continued on the next page				

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District Rule 4684 Requirements	Method of Compliance and Permit Condition Numbers for Compliance					
Section 5.2.2.4.1 states that the weighted average						
monomer VOC content (weight percent) of the	Compliance with this requirement will be					
materials used in an open molding process for boat	ensured with the following permit condition numbers on the indicated Permits to					
manufacturing must not exceed the following limits:	Operate:					
Production Resin (atomized spray): 28%	:					
Production Resin (non-atomized): 35%	Permit Numbers N-1246-1-4 & N-1246-2-4:					
Pigmented Gelcoat (any method): 33%	Permit condition number 2.					
Clear Gelcoat (any method): 48%						
Tooling Resin (atomized): 30%	Permit Number N-1246-8-1					
Tooling Resin (non-atomized): 39%	Permit condition number 1.					
Tooling Gelcoat (any method): 40%						
Section 5.2.2.4.2 identifies the equation to be used to						
calculate the average monomer VOC content based on						
a 12-month rolling average for a particular open						
molding resin or gel coat material as follows:	Compliance with this requirement will be					
Marie Land American Marie Mari	ensured with the following permit condition					
Weighted Average Monomer VOC Content	numbers on the indicated Permits to					
$=\sum_{i} (M_{(i)} \times VOC_{(i)}) / \sum_{i} (M_{(i)})$	Operate:					
Where: M <sub>(i)</sub> = Mass of open molding resin or gel coat i	Permit Numbers N-1246-1-4 & N-1246-2-4:					
used in the past 12 months in an	Permit condition number 3.					
operation, megagrams.						
	Permit Number N-1246-8-1					
VOC <sub>0</sub> = Monomer VOC content, by weight	Permit condition number 2.					
percent, of open molding resin or gel						
coat i used in the past 12 months in an						
operation.						
Section 5.3. lists organic solvent requirements for						
product cleaning, repair and maintenance cleaning, and						
for cleaning of polyester resin application equipment.	Compliance with this requirement will be					
The applicant will comply with the VOC content limits for	ensured with the following permit condition numbers on the indicated Permits to					
organic solvents used in cleaning operation per Section 5.3.1, Table 4 as follows:						
5.5.1, Table 4 as Tollows.	Operate					
A. Product Cleaning During Manufacturing Process or	Permit Numbers N-1246-1-4 & N-1246-2-4:					
Surface Preparation for Coating Application: 25 g/l	Permit condition number 5.					
(0.21 lb/gal).						
B. Repair and Maintenance Cleaning: 25 g/l (0.21	Permit Number N-1246-8-1					
lb/gal).	Permit condition number 4.					
C. Cleaning of Polyester Resin Application Equipment:						
25 g/l (0.21 lb/gal).						
Continued on the r	Continued on the next page					

#### Continued from previous page Method of Compliance and Permit District Rule 4684 Requirements **Condition Numbers for Compliance** Compliance with this requirement will be ensured with the following permit condition Section 5.4 states that an owner or operator must store numbers on the indicated Permits to or dispose of all uncured polyester resin materials, fresh Operate: or spent solvents, waste solvent cleaning materials. such as cloth, paper, etc., coatings, adhesives. catalysts, and thinners in self-closing, non-absorbent Permit Numbers N-1246-1-4 & N-1246-2-4: Permit condition number 6. and non-leaking containers. The containers must remain closed at all times except when depositing or removing the contents of the containers. Permit Number N-1246-8-1: Permit condition number 5. Section 6.1 states that the following records must be kept. Note, only the requirements applicable to this facility are shown below. 1. Daily records of the type and quantity of all resins, gel coats, fillers, catalysts, and cleaning materials (including cleaning solvents) used in each operation. Compliance with these requirements will be Records shall also indicate the amount used and ensured with the following permit condition VOC content, in weight percent, of all polyester numbers on the indicated Permits to resin and gel coat materials used for touch up, Operate: repair, and small jobs. 2. Records of the VOC content, in weight percent, of Permit Numbers N-1246-1-4 & N-1246-2-4: all polyester resin and gel coat, filler materials. Permit condition numbers 7, and 26. including the weight percent of non-monomer VOC content of the resin and gel coat, used or stored at Permit Number N-1246-8-1: the stationary source. Permit condition number 6, and 25. 3. Records of the VOC content of all cleaning materials used or stored at the stationary source as specified in Section 5.3. These records must be kept for a period of five years and made available to the APCO, ARB, or EPA upon

## E. 40 CFR Part 82, Subpart B (Servicing of Motor Vehicle Air Conditioners) and Subpart F (Recycling and Emissions Reduction

request.

There are applicable requirements from Title VI of the CAA (Stratospheric Ozone) that apply to all sources. 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). These requirements are addressed in condition 28. and 29. of the draft Title V permit N-1246-0-3.

### F. 40 CFR Part 64, Compliance Assurance Monitoring (CAM)

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

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

N	lajor Source Thresh	olds Alexander
Pollutant	lb/year	ton/year
NOx	20,000	10
SOx	140,000	7.0
PM <sub>10</sub>	140,000	70
CO	200,000	100
VOC	20,000	10

Permit Number N-1246-1-4: Gel Coat Operation served by Spray Booth #1 (Bleaker Bros. Standard F-20-7, 3HP).

Permit Number N-1246-2-4: Gel Coat Operation Served by Spray Booth #2 (Bleeker Bros. Standard F-20-7, 3HP).

Permit Number N-1246-4-3: Woodworking Operation Consisting of One Table Saw, One Band Saw, One Miter Saw, Two Wormdrive Saws, One Skill Saw, and Two Sanders.

Permit Number N-1246-8-1: Fiberglass Lamination Operation Utilizing Open Molds with Manual Resin Application (Hand Layup) and Mechanical Non-Atomized Resin Application with Fluid Impingement Technology (FIT) Chopper Guns (Spray Layup) for the Manufacturing of Boat Bodies.

These permit units do not contain emission limitations for any pollutant. Therefore, these permit units are not subject to CAM requirements for any pollutant.

Permit Number N-1246-3-3: Fiberglass Grinding Operation Conducted Inside a Building with Filters Ducted to Two Global Finishing Systems Blower Discharge Stacks.

This permit unit contains  $PM_{10}$  emission limits and the operation is served by exhaust filters for  $PM_{10}$  emissions control. Therefore, the emission units may be subject to CAM requirements for  $PM_{10}$  emissions since there are  $PM_{10}$  emission limits and the emission units are served by an add-on control device. In order to be subject to CAM requirements, the uncontrolled potential to emit for this permit unit must exceed the major source threshold for  $PM_{10}$  emissions of 140,000 lb/year.

Pursuant to the application review under District Project #N-1141893, the uncontrolled PM<sub>10</sub> emissions from the fiberglass grinding equipment will have daily potential PM10 emissions of 15.0 lb/day and the permit unit may operate at a worst case of 365 days/year. Therefore, the annual uncontrolled PM<sub>10</sub> emissions are calculated as follows:

Uncontrolled PM<sub>10</sub> Emissions =  $15.0 \text{ lb-PM}_{10}/\text{day} \times 365 \text{ days/year}$ =  $5,475 \text{ lb-PM}_{10}/\text{year}$ 

This permit unit is NOT subject to CAM requirements for  $PM_{10}$  emissions because the uncontrolled  $PM_{10}$  potential to emit is less than the major source threshold of 140,000 pounds  $PM_{10}$ /year.

Permit Number N-1246-5-4: Woodworking Operation Consisting of One Router, One Chop Saw, and One Band Saw. The Router is served by a Murphy Rodgers, Model No. MRT-9A, Dust Collector.

A CAM requirement determination for this permit unit was performed during the previous Title V renewal under District project number N-1091457. The CAM requirements were not triggered for  $PM_{10}$  emissions. There have not been any changes to the processing equipment, control equipment, emission limits, or major source threshold for  $PM_{10}$  emissions since the last modification to this permit unit. Therefore, this permit unit continues to not trigger CAM requirements for  $PM_{10}$  emissions.

#### IX. PERMIT SHIELD

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

#### A. Requirements Addressed by Model General Permit Templates

Model General Permit Template SJV-UM-0-3

By submitting Model General Permit Template SJV-UM-0-3 qualification form, the applicant has requested that a permit shield be granted for all the applicable requirements identified by the template. Therefore, the permit shields as granted in Model General Permit Template are included as conditions 40. and 41. of the facility-wide requirements (N-1246-0-3).

#### B. Requirements not Addressed by Model General Permit Templates

The applicant is not requesting any new permit shields under this Title V renewal application.

#### X. PERMIT CONDITIONS

See Attachment A - Draft Renewed Title V Operating Permit

#### XI. ATTACHMENTS

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

## ATTACHMENT A

Draft Renewed Title V Operating Permit

**FACILITY:** N-1246-0-3

EXPIRATION DATE 09/30/2014

## **FACILITY-WIDE REQUIREMENTS**

- 1. {118} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 2. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rule 109 (Merced)] Federally Enforceable Through Title V Permit
- 3. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rule 109 (Merced)] Federally Enforceable Through Title V Permit
- 4. {4364} The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
- 5. 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 (12/18/14). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
- 6. {4366} The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.9.1 and 9.13.1] Federally Enforceable Through Title V Permit
- 7. {4367} A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
- 8. {4368} Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District Rule 2040] Federally Enforceable Through Title V Permit
- 9. {4369} The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
- 10. {4370} The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 942] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Requirements that affect specific

Facility Name: FINELINE INDUSTRIES, INC.
Location: 455 GROGAN AVENUE, MERCED, CA.
N-1246-0-3 Jun 24 2015 8:03AM - CHANK

Permit Units may constitute modification of those Permit Units Facility Name: FINELINE INDUSTRIES, INC.

- 11. {4371} The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
- 12. {4372} Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
- 13. {4373} If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
- 14. {4374} It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
- 15. {4375} The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
- 16. {4376} The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
- 17. {4377} The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
- 18. {4378} The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
- 19. {4379} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
- 20. {4380} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
- 21. {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
- 22. {4382} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit

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

Eacility Name: FINELINE, INDUSTRIES, INC.
Location: 455 GROGAN AVENUE, MERCED, CA

- 23. {4383} No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
- 24. {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
- 25. {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
- 26. {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
- 27. {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
- 28. {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
- 29. {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
- 30. {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
- 31. {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
- 32. {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
- 33. {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
- 34. {4394} Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8061 and Rule 8011] Federally Enforceable Through Title V Permit

FACILITY WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: FINELINE INDUSTRIES, INC.
Location: 455 GROGAN AVENUE MERCED, CA
N1245-0-3, Jun 24 2015 9:03AM - CHANK

- 35. {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 5.0 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
- 36. {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
- 37. {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
- 38. {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
- 39. {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
- 40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Merced), Rule 109 (Merced), and Rule 202 (Merced). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 41. {4401} Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 42. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin January 1 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

These terms and opportions are part of the Facility-wide Permit to Operate:

Facility Name: FINELINE INDUSTRIES, INC.
Location: 455 GROGAN AVENUE, MERCED, CA

**PERMIT UNIT: N-1246-1-4** 

EXPIRATION DATE 09/30/2014

**EQUIPMENT DESCRIPTION:** 

GEL COAT OPERATION SERVED BY SPRAY BOOTH #1 (BLEEKER BROS. STANDARD F-207)

### PERMIT UNIT REQUIREMENTS

- 1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
- 2. The weighted-average monomer VOC content, by weight percent, of the resin or gel coat materials used at this facility shall not exceed any of the following limits: (1) Pigmented Gel Coats 33%, (2) Clear Gel Coats 48%, (3) Tooling Gel Coats: 40%, (4) Resins (non-atomized) 35%, and (5) Tooling Resins (non-atomized) 39%. [District Rule 4684] Federally Enforceable Through Title V Permit
- 3. The weighted-average monomer VOC content for each resin or gel coat material used at this facility shall be determined based on a 12-month rolling average using Equation 1 of District Rule 4684: Weighted Average Monomer VOC Content = [Summation of (Mi x VOCi)] / [Summation of Mi]; where Mi = Mass of resin or gel coat used in the past 12 months in an operation, in megagrams; and VOCi = Monomer VOC content, by weight percent, of open molding resin or gel coat used in the past 12 months in an operation. [District Rule 4684] Federally Enforceable Through Title V Permit
- 4. Spray application of polyester resin shall only be performed using airless, air assisted airless, or high-volume low-pressure (HVLP) spray equipment. [District Rule 4684] Federally Enforceable Through Title V Permit
- 5. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal), repair and maintenance cleaning: 25 g/l (0.21 lb/gal), and cleaning of polyester resin application equipment: 25 g/l (0.21 lb/gal). [District Rule 4684] Federally Enforceable Through Title V Permit
- 6. Permittee shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in self-closing, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4684] Federally Enforceable Through Title V Permit
- 7. Permittee shall maintain the following records: daily records of the type and quantity of all coatings, resins, catalysts, and cleaning materials used in each operation; records of the VOC content, in weight percent, of all polyester resin materials used or stored at the facility; records of the VOC content of all cleaning materials used and stored at the facility. [District Rule 4684] Federally Enforceable Through Title V Permit
- 8. Compliance using the emissions averaging requirements of 40 CFR Part 63, Subpart VVVV shall be demonstrated on a 12-month rolling-average basis and shall be determined at the end of every month (12 times per year). The first 12-month period begins on August 23, 2004. [40 CFR 63.5710(a)] Federally Enforceable Through Title V Permit
- 9. On August 23, 2005 and at the end of every subsequent month, permittee shall use Equation 1 of 40 CFR 63.5710(b) to demonstrate that the organic HAP emissions from this facility do not exceed the organic HAP emission limit determined by Equation 1 of 40 CFR 63.5698(b), for the same 12-month period. [40 CFR 63.5710(b)] Federally Enforceable Through Title V Permit

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

Facility Name: FINE LINE INDUSTRIES, INC.
Location: 455 GROGAN AVENUE, MERCED, CA

- 10. The organic HAP emissions from this facility shall not exceed the limit established by Equation 1 of 40 CFR 63.5698(b): HAP Limit = [(46 x Mr) + (159 x Mpg) + (291 x Mcg) + (54 x Mtr) + (214 x Mtg)], where Mr = mass of production resins used in the past 12 months; Mpg = mass of pigmented gel coats used in the past 12 months; Mcg = mass of clear gel coats used in the past 12 months; Mtr = mass of tooling resins used in the past 12 months: and Mtg = mass of tooling gel coats used in the past 12 months. All units are in megagrams. [40 CFR 63.5698(b)] Federally Enforceable Through Title V Permit
- 11. On August 23, 2005 and at the end of every subsequent month, permittee shall calculate actual HAP emissions from the preceding 12 months using Equation 1 of 40 CFR 63.5710(b): Actual HAP Emissions = (PVr x Mr) + (PVpg x Mpg) + (PVcg x Mcg) + (PVtr x Mtr) + (PVtg x Mtg), where PVr = weighted-average MACT model point value for production resin used in the past 12 months; Mr = mass of production resin used in the past 12 months; PVpg = weighted-average MACT model point value for pigmented gel coat used in the past 12 months; Mpg = mass of pigmented gel coats used in the past 12 months; PVcg = weighted-average MACT model point value for clear gel coats used in the past 12 months; PVtr = weighted-average MACT model point value for tooling resin used in the past 12 months; PVtg = weighted-average MACT model point value for tooling gel coats used in the past 12 months; and Mtg = mass of tooling gel coats used in the past 12 months. All mass units are in megagrams and all weighted-average MACT model point values are in kilograms per megagram. [40 CFR 63.5710(b)] Federally Enforceable Through Title V Permit
- 12. The weighted-average MACT point values for each resin or gel coat used by this facility shall be determined using Equation 2 of 40 CFR 63.5710(c): Weighted-Average MACT Point Value (PVr, PVpg, PVcg, PVtr and PVtg) = [summation of (Mi x PVi)] / [summation of Mi], where Mi = mass of each resin or gel coat used within the past 12 months, in megagrams; and PVi = MACT model point value for each resin or gel coat used within the past 12 months, in kilograms of HAP per megagram of material applied. [40 CFR 63.5710(c)] Federally Enforceable Through Title V Permit
- 13. The MACT model point values for all resins and gel coats applied shall be determined using the formulas listed in Table 3 of 40 CFR 63, Subpart VVVV: atomized resin. [0.014 x (Resin HAP%, by weight)^2.425]; atomized resin, plus vacuum bagging with roll out [0.01185 x (Resin HAP%, by weight)^2.425]; atomized resin, plus vacuum bagging without roll out [0.00945 x (Resin HAP%, by weight)^2.425]; nonatomized resin, plus bagging with roll out [0.0110 x (Resin HAP%, by weight)^2.275; nonatomized resin, plus bagging without roll out [0.0076 x (Resin HAP%, by weight)^2.275. [40 CFR 63.5710(d)] Federally Enforceable Through Title V Permit
- 14. Permittee shall use cleaning solvents that contain no more than 5% by weight of organic HAP content for routine cleaning of resin and gel coat application equipment. For removal of cured resin and gel coat from application equipment, no organic HAP content limit applies. [40 CFR 63.5734(a)] Federally Enforceable Through Title V Permit
- 15. Organic HAP-containing solvents used for removing cured resin or gel coat shall be stored in containers with covers. The covers must have no visible gaps and shall be in place at all times, except when equipment to cleaned is placed in or removed from the container. On containers with a capacity greater than 2 gallons, the distance from the top of the container to the solvent surface must be equal to or greater than 0.75 times the diameter of the container. [40 CFR 63.5734(b)] Federally Enforceable Through Title V Permit
- 16. All gel coat and resin mixing containers with a capacity equal to or greater than 55 gallons, including those used for on-site mixing of putties and polyputties shall have a cover. The covers shall have no visible gaps and shall be in place at all times, except when material is being manually added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container. [40 CFR 63.5731(a)(b)] Federally Enforceable Through Title V Permit
- 17. At least once per month, 55 gallon or greater mixing containers and containers holding organic HAP containing solvents used for removing cured resin or gel coat must be inspected to ensure the covers have no visible gaps.

  Records of the inspections and any repairs made to the covers must be kept. [40 CFR 63.5731(c)(d) and 63.5737(c)] Federally Enforceable Through Title V Permit

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

Facility Name: FINELINE INDUSTRIES, INC.
Location: 455 GROGAN AVENUE MERCED, CA
N-1246-1-4 Jun 23 2016 10 45 AM - CHANK

- 18. Permittee shall use adhesives that contain no more than 5% by weight of organic HAP content for all carpet and fabric operations. [40 CFR 63.5740(a)] Federally Enforceable Through Title V Permit
- 19. Permittee shall maintain a record of the organic HAP content of cleaning solvents used for routine cleaning of resin and gel coat application equipment and adhesives used for all carpet and fabric operations. [40 CFR 63.5737(a) and 63.5740(b)] Federally Enforceable Through Title V Permit
- 20. Permittee shall determine HAP content of affected materials using one or more of the methods outlined in 40 CFR 63.5758. [40 CFR 63.5758] Federally Enforceable Through Title V Permit
- 21. Permittee shall submit a notification of compliance status to the District no later than 30 days after the end of the first 12-month averaging period. The notification shall include the following: type and quantity of HAP's emitted at the facility; the method used to determine compliance; the method that will be used to determine continuing compliance; and a statement by the permittee as to whether the facility has complied with the HAP content limits. If there is a change to information submitted in the notification, changes shall be submitted in writing within 15 days after the change. [40 CFR 63.5761] Federally Enforceable Through Title V Permit
- 22. Permittee shall submit a compliance report to the District every 6 months. The first compliance report shall be submitted no later than 60 days after 12/31/05. Each subsequent report shall cover the applicable semiannual reporting period from January 1 through June 30 or from July 1 through December 31. Each subsequent compliance report shall be submitted no later than 60 days after the end of the semiannual reporting period. [40 CFR 63.5764(b)] Federally Enforceable Through Title V Permit
- 23. The compliance report shall include the following information: (1) Company name and address; (2) Signed and dated statement by a responsible official certifying the truth, accuracy, and completeness of the report; (3) Dates covered by the compliance report; (4) Description of any changes in the manufacturing process since the last compliance report; (5) Table or statement showing, for each regulated operation, the applicable organic HAP content limit and application equipment requirement with which the facility is complying and the actual weighted-average organic HAP content for each operation during each of the rolling 12-month averaging periods that end during the reporting period; (6) If compliance is achieved during the reporting period, a statement indicating such effect shall be included with the report; and (7) If any of the regulated operations were not in compliance during the reporting period, the following shall be included with the semiannual compliance report: (i) Operation(s) involved in the deviation; (ii) quantity, organic HAP content, and application method of the materials involved in the deviation; (iii) actions taken to minimize the deviation and to prevent it in the future; and (iv) Statement of whether or not the facility was in compliance for the 12-month averaging period that ended at the end of the reporting period. [40 CFR 63.5764(c)] Federally Enforceable Through Title V Permit
- 24. The following exemptions apply to the gel coat and resin operations: (1) Gel coat materials used for part/mold repair and touch up shall be exempt from the organic HAP content limits. The total gel coat materials used in this exemption shall not exceed 1 percent by weight of all gel coat used at the facility on a 12-month rolling-average basis. Records shall be kept of the amount of gel coats used per month for which this exemption is being used and copies of calculations showing that the exempt amount does not exceed 1 percent of all gel coat used. (2) Pure 100% vinylester resin used for skin coats. The total resin materials included in the exemption shall not exceed 5% by weight of all resin used at the facility on a 12-month rolling-average basis. Records shall be kept of the amount of 100 percent vinylester skin coat used per month for which this exemption is being used and copies of calculations showing that the exempt amount does not exceed 5% percent of all resin used. [40 CFR 63.5698(d)] Federally Enforceable Through Title V Permit
- 25. Permittee shall maintain the following records, in addition to those records required by conditions of this permit: (1) a copy of each notification and report submitted to the District; (2) Support documentation for any notice or report submitted to the District; (3) Total amounts of each production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat used per month and the weighted-average organic HAP content for each operation, expressed as weight percent (this record is not required for an operation if all materials used for that operation comply with the organic HAP content requirements); (4) for production resin and tooling resin the amounts of each applied by atomized or nonatomized methods. [40 CFR 63.5767] Federally Enforceable Through Title V Permit

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

Facility Name: FINELINE INDUSTRIES, INC.
Location: 455 GROGAN AVENUE MERCED, CA

26. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2520, 9.4.2 and 4684] Federally Enforceable Through Title V Permit

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

Facility Name: FINELINE INDUSTRIES, INC.
Location: 455 GROGAN AVENUE, MERCED, CA
N-1245-14 : Jun 22 2015 10 45AM - CHANK

**PERMIT UNIT:** N-1246-2-4

EXPIRATION DAILE 09/30/2014

**EQUIPMENT DESCRIPTION:** 

GEL COAT OPERATION SERVED BY SPRAY BOOTH #2 (BLEEKER BROS. STANDARD F-2017 3 H

### PERMIT UNIT REQUIREMENTS

- 1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
- 2. The weighted-average monomer VOC content, by weight percent, of the resin or gel coat materials used at this facility shall not exceed any of the following limits: (1) Pigmented Gel Coats 33%, (2) Clear Gel Coats 48%, (3) Tooling Gel Coats: 40%, (4) Resins (non-atomized) 35%, and (5) Tooling Resins (non-atomized) 39%. [District Rule 4684] Federally Enforceable Through Title V Permit
- 3. The weighted-average monomer VOC content for each resin or gel coat material used at this facility shall be determined based on a 12-month rolling average using Equation 1 of District Rule 4684: Weighted Average Monomer VOC Content = [Summation of (Mi x VOCi)] / [Summation of Mi]; where Mi = Mass of resin or gel coat used in the past 12 months in an operation, in megagrams; and VOCi = Monomer VOC content, by weight percent, of open molding resin or gel coat used in the past 12 months in an operation. [District Rule 4684] Federally Enforceable Through Title V Permit
- 4. Spray application of polyester resin shall only be performed using airless, air assisted airless, or high-volume low-pressure (HVLP) spray equipment. [District Rule 4684] Federally Enforceable Through Title V Permit
- 5. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal), repair and maintenance cleaning: 25 g/l (0.21 lb/gal), and cleaning of polyester resin application equipment: 25 g/l (0.21 lb/gal). [District Rule 4684] Federally Enforceable Through Title V Permit
- 6. Permittee shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in self-closing, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4684] Federally Enforceable Through Title V Permit
- 7. Permittee shall maintain the following records: daily records of the type and quantity of all coatings, resins, catalysts, and cleaning materials used in each operation; records of the VOC content, in weight percent, of all polyester resin materials used or stored at the facility; records of the VOC content of all cleaning materials used and stored at the facility. [District Rule 4684] Federally Enforceable Through Title V Permit
- 8. Compliance using the emissions averaging requirements of 40 CFR Part 63, Subpart VVVV shall be demonstrated on a 12-month rolling-average basis and shall be determined at the end of every month (12 times per year). The first 12-month period begins on August 23, 2004. [40 CFR 63.5710(a)] Federally Enforceable Through Title V Permit.
- 9. On August 23, 2005 and at the end of every subsequent month, permittee shall use Equation 1 of 40 CFR 63.5710(b) to demonstrate that the organic HAP emissions from this facility do not exceed the organic HAP emission limit determined by Equation 1 of 40 CFR 63.5698(b), for the same 12-month period. [40 CFR 63.5710(b)] Federally Enforceable Through Title V Permit

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

Facility Name: FINELINE INDUSTRIES, INC. Location: 455 GROGAN AVENUE MERCED. CA

- 10. The organic HAP emissions from this facility shall not exceed the limit established by Equation 1 of 40 CFR 63.5698(b): HAP Limit = [(46 x Mr) + (159 x Mpg) + (291 x Mcg) + (54 x Mtr) + (214 x Mtg)], where Mr = mass of production resins used in the past 12 months; Mpg = mass of pigmented gel coats used in the past 12 months; Mcg = mass of clear gel coats used in the past 12 months; Mtr = mass of tooling resins used in the past 12 months; and Mtg = mass of tooling gel coats used in the past 12 months. All units are in megagrams. [40 CFR 63.5698(b)] Federally Enforceable Through Title V Permit
- 11. On August 23, 2005 and at the end of every subsequent month, permittee shall calculate actual HAP emissions from the preceding 12 months using Equation 1 of 40 CFR 63.5710(b): Actual HAP Emissions = (PVr x Mr) + (PVpg x Mpg) + (PVcg x Mcg) + (PVtr x Mtr) + (PVtg x Mtg); where PVr = weighted-average MACT model point value for production resin used in the past 12 months; Mr = mass of production resin used in the past 12 months; PVpg = weighted-average MACT model point value for pigmented gel coat used in the past 12 months; PVcg = weighted-average MACT model point value for clear gel coat used in the past 12 months; Mcg = mass of clear gel coats used in the past 12 months; PVtr = weighted-average MACT model point value for tooling resin used in the past 12 months; PVtg = weighted-average MACT model point value for tooling resins used in the past 12 months; PVtg = weighted-average MACT model point value for tooling gel coats used in the past 12 months; and Mtg = mass of tooling gel coats used in the past 12 months. All mass units are in megagrams and all weighted-average MACT model point values are in kilograms per megagram. [40 CFR 63.5710(b)] Federally Enforceable Through Title V Permit
- 12. The weighted-average MACT point values for each resin or gel coat used by this facility shall be determined using Equation 2 of 40 CFR 63.5710(c): Weighted-Average MACT Point Value (PVr, PVpg, PVcg, PVtr and PVtg) = [summation of (Mi x PVi)] / [summation of Mi], where Mi = mass of each resin or gel coat used within the past 12 months, in megagrams; and PVi = MACT model point value for each resin or gel coat used within the past 12 months, in kilograms of HAP per megagram of material applied. [40 CFR 63.5710(c)] Federally Enforceable Through Title V Permit
- 13. The MACT model point values for all resins and gel coats applied shall be determined using the formulas listed in Table 3 of 40 CFR 63, Subpart VVVV: atomized resin [0.014 x (Resin HAP%, by weight)^2.425]; atomized resin, plus vacuum bagging with roll out [0.01185 x (Resin HAP%, by weight)^2.425]; atomized resin, plus vacuum bagging without roll out [0.00945 x (Resin HAP%, by weight)^2.425]; nonatomized resin [0.014 x (Resin HAP%, by weight)^2.275]; nonatomized resin, plus bagging without roll out [0.0110 x (Resin HAP%, by weight)^2.275. [40 CFR 63.5710(d)] Federally Enforceable Through Title V Permit
- 14. Permittee shall use cleaning solvents that contain no more than 5% by weight of organic HAP content for routine cleaning of resin and gel coat application equipment. For removal of cured resin and gel coat from application equipment, no organic HAP content limit applies. [40 CFR 63.5734(a)] Federally Enforceable Through Title V Permit
- 15. Organic HAP-containing solvents used for removing cured resin or gel coat shall be stored in containers with covers. The covers must have no visible gaps and shall be in place at all times, except when equipment to cleaned is placed in or removed from the container. On containers with a capacity greater than 2 gallons, the distance from the top of the container to the solvent surface must be equal to or greater than 0.75 times the diameter of the container. [40 CFR 63.5734(b)] Federally Enforceable Through Title V Permit
- 16. All gel coat and resin mixing containers with a capacity equal to or greater than 55 gallons, including those used for on-site mixing of putties and polyputties shall have a cover. The covers shall have no visible gaps and shall be in place at all times, except when material is being manually added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container: [40 CFR 63.5731(a)(b)] Federally Enforceable Through Title V Permit
- 17. At least once per month, 55 gallon or greater mixing containers and containers holding organic HAP containing solvents used for removing cured resin or gel coat must be inspected to ensure the covers have no visible gaps.

  Records of the inspections and any repairs made to the covers must be kept. [40 CFR 63.573-l(c)(d) and 63.5737(c)] Federally Enforceable Through Title V Permit

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

Facility Name: FINELINE INDUSTRIES, INC.
Location: 455 GROGAN AVENUE, MERCED, CA
N-1240-24: Jun 23 2015 10 45AM - CHANK

- 18. Permittee shall use adhesives that contain no more than 5% by weight of organic HAP content for all carpet and fabric operations. [40 CFR 63.5740(a)] Federally Enforceable Through Title V Permit
- 19. Permittee shall maintain a record of the organic HAP content of cleaning solvents used for routine cleaning of resin and gel coat application equipment and adhesives used for all carpet and fabric operations. [40 CFR 63.5737(a) and 63.5740(b)] Federally Enforceable Through Title V Permit
- 20. Permittee shall determine HAP content of affected materials using one or more of the methods outlined in 40 CFR 63.5758. [40 CFR 63.5758] Federally Enforceable Through Title V Permit
- 21. Permittee shall submit a notification of compliance status to the District no later than 30 days after the end of the first 12-month averaging period. The notification shall include the following: type and quantity of HAP's emitted at the facility: the method used to determine compliance; the method that will be used to determine continuing compliance; and a statement by the permittee as to whether the facility has complied with the HAP content limits. If there is a change to information submitted in the notification, changes shall be submitted in writing within 15 days after the change. [40 CFR 63.5761] Federally Enforceable Through Title V Permit
- 22. Permittee shall submit a compliance report to the District every 6 months. The first compliance report shall be submitted no later than 60 days after 12/31/05. Each subsequent report shall cover the applicable semiannual reporting period from January 1 through June 30 or from July 1 through December 31. Each subsequent compliance report shall be submitted no later than 60 days after the end of the semiannual reporting period. [40 CFR 63.5764(b)] Federally Enforceable Through Title V Permit
- 23. The compliance report shall include the following information: (1) Company name and address; (2) Signed and dated statement by a responsible official certifying the truth, accuracy, and completeness of the report; (3) Dates covered by the compliance report; (4) Description of any changes in the manufacturing process since the last compliance report; (5) Table or statement showing, for each regulated operation, the applicable organic HAP content limit and application equipment requirement with which the facility is complying and the actual weighted-average organic HAP content for each operation during each of the rolling 12-month averaging periods that end during the reporting period; (6) If compliance is achieved during the reporting period a statement indicating such effect shall be included with the report; and (7) If any of the regulated operations were not in compliance during the reporting period, the following shall be included with the semiannual compliance report: (i) Operation(s) involved in the deviation; (ii) quantity, organic HAP content, and application method of the materials involved in the deviation; (iii) actions taken to minimize the deviation and to prevent it in the future; and (iv) Statement of whether or not the facility was in compliance for the 12-month averaging period that ended at the end of the reporting period. [40 CFR 63,5764(c)] Federally Enforceable Through Title V Permit
- 24. The following exemptions apply to the gel coat and resin operations: (1) Gel coat materials used for part/mold repair and touch up shall be exempt from the organic HAP content limits. The total gel coat materials used in this exemption shall not exceed 1 percent by weight of all gel coat used at the facility on a 12-month rolling-average basis. Records shall be kept of the amount of gel coats used per month for which this exemption is being used and copies of calculations showing that the exempt amount does not exceed 1 percent of all gel coat used. (2) Pure 100% vinylester resin used for skin coats. The total resin materials included in the exemption shall not exceed 5% by weight of all resin used at the facility on a 12-month rolling-average basis. Records shall be kept of the amount of 100 percent vinylester skin coat used per month for which this exemption is being used and copies of calculations showing that the exempt amount does not exceed 5% percent of all resin used, [40 CFR 63,5698(d)] Federally Enforceable Through Title V Permit
- 25. Permittee shall maintain the following records, in addition to those records required by conditions of this permit: (1) a copy of each notification and report submitted to the District; (2) Support documentation for any notice or report submitted to the District; (3) Total amounts of each production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat used per month and the weighted-average organic HAP content for each operation, expressed as weight percent (this record is not required for an operation if all materials used for that operation comply with the organic HAP content requirements); (4) for production resin and tooling resin the amounts of each applied by atomized or nonatomized methods. [40 CFR 63,5767] Federally Enforceable Through Title V Permit

PERMITUNIT REQUIREMENTS CONTINUE ON NEXT PAGE dre part of the Facility-wide Permit to Operate. These terms and

Facility Name: FINELINE INDUSTRIES, INC. 455 GROGAN AVENUE, MERCED, CA

26. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2520, 9.4.2 and 4684] Federally Enforceable Through Title V Permit

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

Facility Name: FINELINE INDUSTRIES, INC.
Location: 455 GROGAN AVENUE MERCED, CA
N-1248-2-4: Jun 23 2016 10:46AM = CHANK

**PERMIT UNIT: N-1246-3-3** 

#### **EQUIPMENT DESCRIPTION:**

FIBERGLASS GRINDING OPERATION CONDUCTED INSIDE A BUILDING WITH FILTERS DUCTED FINISHING SYSTEMS BLOWER DISCHARGE STACKS.

### PERMIT UNIT REQUIREMENTS

- Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
- Visible emissions from each discharge stack serving the grinding operation shall not equal or exceed 5% opacity for a 2. period or periods aggregating more than three minutes in any one hour. [District Rules 2201 and 4101] Federally Enforceable Through Title V Permit
- The grinding operation shall be conducted inside a building area which is partitioned from the main building with a solid wall containing roll up doors and a walk in door. The wall shall completely seal the cross sectional area between the roof and the floor, with an exception of any necessary natural draft openings (NDO) needed to bring make-up air into the grinding area. [District Rule 2201] Federally Enforceable Through Title V Permit
- The direction of make-up air flow through each NDO shall occur into the grinding area. [District Rule 2201] Federally Enforceable Through Title V Permit
- 5. The owner or operator shall keep a sketch of the grinding area showing each NDO, direction of airflow through each NDO, and measured air velocity across each NDO. [District Rule 2201] Federally Enforceable Through Title V Permit
- The grinding area laden air shall be discharged through the filters prior to being released into the atmosphere. District Rule 2201] Federally Enforceable Through Title V Permit
- The exhaust blowers shall be switched on prior to the start of the grinding operation. [District Rule 2201] Federally Enforceable Through Title V Permit
- All filters shall be properly maintained and must be in place during the grinding operation. [District Rule 2201] Federally Enforceable Through Title V Permit
- A spare set of filters shall be maintained on the premises at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
- 10. PM10 emissions from this operation shall not exceed 0.26 pounds per pound of fiberglass waste collected from the floor. [District Rule 2201] Federally Enforceable Through Title V Permit
- 11. The quantity of fiberglass waste collected from the floor shall not exceed 10 pounds in any one day, [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. The owner or operator shall keep a daily record of the quantity of fiberglass waste collected from the floor in pounds. [District Rule 2201] Federally Enforceable Through Title V Permit
- 13. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit.

These terms and condition cility-wide Permit to Operate.

Facility Name: FINELINE INDUSTRIES, INC. Location: 455 GROGAN AVENUE, MERCED, CA

**PERMIT UNIT: N-1246-4-3** 

EXPIRATION DAILE 09/30/2014

**EQUIPMENT DESCRIPTION:** 

WOODWORKING OPERATION CONSISTING OF ONE TABLE SAW, ONE BAND SAW, ONE MITER SAW, TWO WORMDRIVE SAWS, ONE SKILL SAW, AND TWO SANDERS.

### PERMIT UNIT REQUIREMENTS

Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

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

Facility Name: FINELINE INDUSTRIES, INC.
Location: 455 GROGAN AVENUE, MERCED, CA

**PERMIT UNIT:** N-1246-5-4

**EQUIPMENT DESCRIPTION:** 

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

### PERMIT UNIT REQUIREMENTS

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

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

Facility Name: FINELINE INDUSTRIES, INC. 455 GROGAN AVENUE MERCED, CA

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

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

Facility Name: FINELINE INDUSTRIES, INC.
Location: 455 GROGAN AVENUE MERCED, CA.
N. 1246-54-1 Jun 23 2015 10 45AM - CHANK

**PERMIT UNIT: N-1246-8-1** 

EXPIRATION DATE 00/30/2014

**EQUIPMENT DESCRIPTION:** 

FIBERGLASS LAMINATION OPERATION UTILIZING OPEN MOLDS WITH MANUAL RESIN APPLICATION (HAND LAYUP) AND MECHANICAL NON-ATOMIZED RESIN APPLICATION WITH FLUID IMPINGEMENT TECHNOLOGY (FIT) CHOPPER GUNS (SPRAY LAYUP) FOR THE MANUFACTURING OF BOAT BODIES.

### PERMIT UNIT REQUIREMENTS

- The weighted-average monomer VOC content, by weight percent, of the resin or gel coat materials used at this facility shall not exceed any of the following limits: (1) Pigmented Gel Coats 33%, (2) Clear Gel Coats 48%, (3) Tooling Gel Coats: 40%, (4) Resins (non-atomized) 35%, and (5) Tooling Resins (non-atomized) 39%. [District Rule 4684] Federally Enforceable Through Title V Permit
- 2. The weighted-average monomer VOC content for each resin or gel coat material used at this facility shall be determined based on a 12-month rolling average using Equation 1 of District Rule 4684: Weighted Average Monomer VOC Content = [Summation of (Mi x VOCi)] / [Summation of Mi]; where Mi = Mass of resin or gel coat used in the past 12 months in an operation, in megagrams; and VOCi = Monomer VOC content, by weight percent, of open molding resin or gel coat used in the past 12 months in an operation. [District Rule 4684] Federally Enforceable Through Title V Permit
- 3. Application of the polyester resins shall only be performed using the following methods: (a). Hand layup application techniques; (b). Non-atomizing spray application; or (c). Any equivalent method as approved by the APCO. [District Rule 4684] Federally Enforceable Through Title V Permit
- 4. The permittee shall not use organic solvents that exceed any of the following limits: (a). For product cleaning during manufacturing process or surface preparation for coating application: 25 g/l; (b). For repair and maintenance cleaning: 25 g/l; (c) For cleaning of polyester resin application equipment: 25 g/l. [District Rule 4684] Federally Enforceable Through Title V Permit
- 5. Permittee shall store and dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as paper, cloth, etc., catalysts, hardeners, and thinners in self-closing, non-absorbent, and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4684] Federally Enforceable Through Title V Permit
- 6. Permittee shall maintain the following records: daily records of the type and quantity of all resins, catalysts, and cleaning materials used in each operation; records of the VOC content (in weight percent) of all polyester resin materials, including the weight percent of non-monomer VOC of the resin materials, used or stored at the facility; records of the VOC content of all cleaning materials used and stored at the facility. [District Rule 4684] Federally Enforceable Through Title V Permit
- 7. Compliance using the emissions averaging requirements of 40 CFR Part 63, Subpart VVVV shall be demonstrated on a 12-month rolling-average basis and shall be determined at the end of every month (12 times per year). The first 12-month period begins on August 23, 2004. [40 CFR 63.5710(a)] Federally Enforceable Through Title V Permit
- 8. At the end of every subsequent month, the permittee shall use Equation 1 of 40 CFR 63.5710(b) to demonstrate that the organic HAP emissions from this facility do not exceed the organic HAP emission limit determined by Equation 1 in 40 CFR 63.5698, for the same 12-month period. [40 CFR 63.510(b)] Federally Enforceable Through Title V Permit

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

Facility Name: FINELINE INDUSTRIES, INC.
Location: 455 GROGAN AVENUE, MERCED, CA

- 9. The organic HAP emissions from this facility shall not exceed the limit established by Equation 1 of 40 CFR 63.5698(b) excluding the exempt materials specified in 40 CFR 63.5698(d): HAP Limit = [(46 x Mr) + (159 x Mpg) + (291 x Mcg) + (54 x Mtr) + (214 x Mtg)], where Mr = mass of production resins used in the past 12 months; Mpg = mass of pigmented gel coats used in the past 12 months; Mcg = mass of tooling resins used in the past 12 months; Mtr = mass of tooling resins used in the past 12 months. All units are in megagrams. [40 CFR 63.5698(b)] Federally Enforceable Through Title V Permit
- 10. At the end every subsequent month, the permittee shall calculate the actual HAP emissions from the preceding 12 months using Equation 1 of 40 CFR 63.5710(b): Actual HAP Emissions = (PVr x Mr) + (PVpg x Mpg) + (PVcg x Mcg) + (PVtr x Mtr) + (PVtg x Mtg), where PVr = weighted-average MACT model point value for production resin used in the past 12 months; Mr = mass of production resin used in the past 12 months; PVpg = weighted-average MACT model point value for pigmented gel coat used in the past 12 months; Mpg = mass of pigmented gel coats used in the past 12 months; Mcg = mass of clear gel coats used in the past 12 months; Mcg = mass of clear gel coats used in the past 12 months; PVtr = weighted-average MACT model point value for tooling resin used in the past 12 months; Mtr = mass of tooling resins used in the past 12 months; PVtg = weighted-average MACT model point value for tooling gel coat used in the past 12 months; and Mtg = mass of tooling gel coats used in the past 12 months. All mass units are in megagrams and all weighted-average MACT model point values are in kilograms per megagram. [40 CFR 63.5710(b)] Federally Enforceable Through Title V Permit
- 11. At the end of every month, the weighted-average MACT point values for each resin or gel coat used by this facility shall be determined using Equation 2 of 40 CFR 63.5710(c): Weighted-Average MACT Point Value (PVr, PVpg, PVcg, PVtr and PVtg) = [summation of (Mi x PVi)] / [summation of Mi], where Mi = mass of each resin or gel coat used within the past 12 months, in megagrams; and PVi = MACT model point value for each resin or gel coat used within the past 12 months, in kilograms of HAP per megagram of material applied. [40 CFR 63.5710(c)] Federally Enforceable Through Title V Permit
- 12. The MACT model point values for all resins and gel coats applied shall be determined using the formulas listed in Table 3 of 40 CFR 63, Subpart VVVV: atomized resin [0.014 x (Resin HAP%, by weight)^2.425]; atomized resin, plus vacuum bagging with roll out [0.01185 x (Resin HAP%, by weight)^2.425]; atomized resin, plus vacuum bagging without roll out [0.00945 x (Resin HAP%, by weight)^2.425]; nonatomized resin [0.014 x (Resin HAP%, by weight)^2.275]; nonatomized resin, plus bagging without roll out [0.0100 x (Resin HAP%, by weight)^2.275; nonatomized resin, plus bagging without roll out [0.0076 x (Resin HAP%, by weight)^2.275. [40 CFR 63.5710(d)] Federally Enforceable Through Title V Permit
- 13. Permittee shall use cleaning solvents that contain no more than 5% by weight of organic HAP content for routine cleaning of resin and gel coat application equipment. For removal of cured resin and gel coat from application equipment, no organic HAP content limit applies. [40 CFR 63,5734(a)] Federally Enforceable Through Title V Permit
- 14. Organic HAP-containing solvents used for removing cured resin or gel coat shall be stored in containers with covers. The covers must have no visible gaps and shall be in place at all times, except when equipment to be cleaned is placed in or removed from the container. On containers with a capacity greater than 2 gallons, the distance from the top of the container to the solvent surface must be equal to or greater than 0.75 times the diameter of the container. [40 CFR 63.5734(b)] Federally Enforceable Through Title V Permit
- 15. All gel coat and resin mixing containers with a capacity equal to or greater than 55 gallons, including those used for on-site mixing of putties and polyputties shall have a cover. The covers shall have no visible gaps and shall be in place at all times, except when material is being manually added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container. [40 CFR 63.5731(a)(b)] Federally Enforceable Through Title V Permit
- 16. At least once per month, all gel coat and resin mixing containers with a capacity equal to or greater than 55 gallon (including those used for on-site mixing of putties and polyputties) and containers holding organic HAP containing solvents used for removing cured resin or gel coat must be inspected to ensure the covers have no visible gaps. Records of the inspections and any repairs made to the covers must be kept. [40 CFR 63.5731(c)(d) and 63.5737(c)] Federally Enforceable Through Title V Permit

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

Facility Name: FINELINE INDUSTRIES, INC.
Location: 455 GROGAN AVENUE, MERCED, CA
N-1246-8-1-3 Jun 23 2015 19 45AM - CHAIK

- 17. Permittee shall use adhesives that contain no more than 5% by weight of organic HAP content for all carpet and fabric operations, [40 CFR 63,5740(a)] Federally Enforceable Through Title V Permit
- 18. Permittee shall maintain a record of the organic HAP content of cleaning solvents used for routine cleaning of resin and gel coat application equipment and adhesives used for all carpet and fabric operations. [40 CFR 63.5737(a) and 63.5740(b)] Federally Enforceable Through Title V Permit
- 19. Permittee shall determine HAP content of affected materials using one or more of the methods outlined in 40 CFR 63.5758. [40 CFR 63.5758] Federally Enforceable Through Title V Permit
- 20. Permittee shall submit a notification of compliance status to the District no later than 30 days after the end of the first 12-month averaging period. The notification shall include the following: type and quantity of HAP's emitted at the facility: the method used to determine compliance; the method that will be used to determine continuing compliance; and a statement by the permittee as to whether the facility has complied with the HAP content limits. If there is a change to information submitted in the notification, changes shall be submitted in writing within 15 days after the change. [40 CFR 63.5761] Federally Enforceable Through Title V Permit
- 21. Permittee shall submit a compliance report to the District every 6 months. The first compliance report shall be submitted no later than 60 days after 12/31/05. Each subsequent report shall cover the applicable semiannual reporting period from January 1 through June 30 or from July 1 through December 31. Each subsequent compliance report shall be submitted no later than 60 days after the end of the semiannual reporting period. [40 CFR 63.5764(b)] Federally Enforceable Through Title V Permit
- 22. The compliance report shall include the following information: (1) Company name and address; (2) Signed and dated statement by a responsible official certifying the truth, accuracy, and completeness of the report; (3) Dates covered by the compliance report; (4) Description of any changes in the manufacturing process since the last compliance report; (5) Table or statement showing, for each regulated operation, the applicable organic HAP content limit and application equipment requirement with which the facility is complying and the actual weighted-average organic HAP content for each operation during each of the rolling 12-month averaging periods that end during the reporting period; (6) If compliance is achieved during the reporting period, include a statement of compliance in the report; and (7) If any of the regulated operations were not in compliance during the reporting period, the following shall be included with the semiannual compliance report: (i) Operation(s) involved in the deviation; (ii) quantity, organic HAP content, and application method of the materials involved in the deviation; (iii) actions taken to minimize the deviation and to prevent it in the future, and (iv) Statement of whether or not the facility was in compliance for the 12-month averaging period that ended at the end of the reporting period. [40 CFR 63.5764(c)] Federally Enforceable Through Title V Permit
- 23. The following exemptions apply to gel coat and resin operations: (1) Pigmented, clear, and tooling gel coat materials used for part/mold repair and touch up shall be exempt from the organic HAP content limits. The total gel coat materials used in this exemption shall not exceed 1 percent by weight of all gel coat used at the facility on a 12-month rolling-average basis. Records shall be kept of the amount of gel coats used per month for which this exemption is being used and copies of calculations showing that the exempt amount does not exceed 1 percent of all gel coat used; (2) Pure 100% vinylester resin used for skin coats. The total resin materials included in the exemption shall not exceed 5% by weight of all resin used at the facility on a 12-month rolling-average basis. Records shall be kept of the amount of 100 percent vinylester skin coat used per month for which this exemption is being used and copies of calculations showing that the exempt amount does not exceed 5% percent of all resinused. [40 CFR 63.5698(d)] Federally Enforceable Through Title V Permit
- 24. Permittee shall maintain the following records, in addition to those records required by conditions of this permit: (1) a copy of each notification and report submitted to the District; (2) Support documentation for any notice or report submitted to the District; (3) Total amounts of each production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat used per month and the weighted-average organic HAP content for each operation, expressed as weight percent; (4) for production resin and tooling resin the amounts of each applied by atomized or nonatomized methods, [40 CFR 63.5767] Federally Enforceable Through Title V Permit
- 25. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070 and 4684 and 40 CFR 63.5770] Federally Enforceable Through Title V Permit

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

Facility Name: FINELINE INDUSTRIES, INC. 455 GROGAN AVENUE MERCED, CA

## ATTACHMENT B

Previous Title V Operating Permit





## Permit to Operate

FACILITY: N-1246

EXPIRATION DATE: 09/30/2014

**LEGAL OWNER OR OPERATOR:** 

FINELINE INDUSTRIES, INC.

**MAILING ADDRESS:** 

455 GROGAN AVENUE MERCED, CA 95341

FACILITY LOCATION:

**455 GROGAN AVENUE** 

MERCED, CA

**FACILITY DESCRIPTION:** 

MANUFACTURER OF FIBERGLASS BOATS

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

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

Seyed Sadredin
Executive Director / APCO

David Warner
Director of Permit Services

FACILITY: N-1246-0-2

**EXPIRATION DATE: 09/30/2014** 

#### **FACILITY-WIDE REQUIREMENTS**

- 1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 2. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
- 3. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
- 4. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
- 5. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
- The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.9.1 and 9.13.1] Federally Enforceable Through Title V Permit
- 7. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District [District Rule 2031] Federally Enforceable Through Title V Permit
- 8. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District Rule 2040 Federally Enforceable Through Title V Permit
- 9. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
- 10. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: FINELINE INDUSTRIES, INC.
Location: 455 GROGAN AVENUE MERCED, CA
H-1246-0 2: Nov 2 2010 9 46AB - 8 ONGCOJ

- 11. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
- 12. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
- 13. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
- 14. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
- 15. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance; or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
- 16. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
- 17. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
- 18. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
- 19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
- 20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
- 21. Upon presentation of appropriate credemials, 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 County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit

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

Facility Name: FINELINE INDUSTRIES, INC.
Location: 455 GROGAN AVENUE MERCED, CA
11216-0-27 Nov 7 2010 9 4644 - \$10N0COJ

- 23. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in 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 Rule 4601, 5.1] Federally Enforceable Through Title V Permit
- 24. 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. 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. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
- 27. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
- 28. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
- 29. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8021 and 8011] Federally Enforceable Through Title V Permit
- 30. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8031 and 8011] Federally Enforceable Through Title V Permit
- 31. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8041 and 8011] Federally Enforceable Through Title V Permit
- 32. Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8051 and 8011] Federally Enforceable Through Title V Permit
- 33. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8061 and Rule 8011] Federally Enforceable Through Title V Permit
- 34. 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. 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.

Facility Name: FINELINE INDUSTRIES, INC Location: 455 GROGAN AVENUE MERCED, CA N1746-07-7-1017-7-2010 9 4944-1-100000000

- 36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
- 37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V
- 38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
- 39. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated S1P requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/1709); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 41. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin January 1 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

**PERMIT UNIT: N-1246-1-3** 

**EXPIRATION DATE: 09/30/2014** 

**EQUIPMENT DESCRIPTION:** 

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

#### PERMIT UNIT REQUIREMENTS

- 1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
- 2. The monomer content of polyester materials used at this facility shall be equal to or less than the following: for polyester resins, 35% by weight; for pigmented gel coats, 45% by weight; for specialty resins and clear gel coats, 50% by weight. [District Rule 4684, 5.1.1.1] Federally Enforceable Through Title V Permit
- 3. Spray application of polyester resin shall only be performed using airless, air assisted airless, or high-volume low-pressure (HVLP) spray equipment. [District Rule 4684, 5.1.2] Federally Enforceable Through Title V Permit
- 4. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal), repair and maintenance cleaning: 25 g/l (0.21 lb/gal), and cleaning of polyester resin application equipment: 25 g/l (0.21 lb/gal). [District Rule 4684, 5.3.1] Federally Enforceable Through Title V Permit
- 5. Permittee shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in self-closing, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4684, 5.4] Federally Enforceable Through Title V Permit
- 6. Permittee shall maintain the following records: daily records of the type and quantity of all coatings, resins, catalysts, and cleaning materials used in each operation; records of the VOC content, in weight percent, of all polyester resin materials used or stored at the facility; records of the VOC content of all cleaning materials used and stored at the facility. [District Rule 4684, 6.1] Federally Enforceable Through Title V Permit
- 7. Compliance using the emissions averaging requirements of 40 CFR Part 63, Subpart VVVV shall be demonstrated on a 12-month rolling-average basis and shall be determined at the end of every month (12 times per year). The first 12-month period begins on August 23, 2004. [40 CFR 63.5710(a)] Federally Enforceable Through Title V Permit
- 8. On August 23, 2005 and at the end of every subsequent month, permittee shall use Equation 1 of 40 CFR 63.5710(b) to demonstrate that the organic HAP emissions from this facility do not exceed the organic HAP emission limit determined by Equation 1 of 40 CFR 63.5698(b), for the same 12-month period. [40 CFR 63.5710(b)] Federally Enforceable Through Title V Permit
- 9. The organic HAP emissions from this facility shall not exceed the limit established by Equation 1 of 40 CFR 63.5698(b): HAP Limit = [(46 x Mr) + (159 x Mpg) + (291 x Mcg) + (54 x Mtr) + (214 x Mtg)], where Mr = mass of production resins used in the past 12 months; Mpg = mass of pigmented gel coats used in the past 12 months; Mcg = mass of clear gel coats used in the past 12 months; Mtr = mass of tooling resins used in the past 12 months: and Mtg = mass of tooling gel coats used in the past 12 months. All units are in mcgagrams. [40 CFR 63.5698(b)] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE.

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

Facility Name: FINELINE INDUSTRIES, INC. Location: 455 GROGAN AVENUE MERCED. CA M1245 13 100 27010 9 4644 - 9/0/0000

- 10. On August 23, 2005 and at the end of every subsequent month, permittee shall calculate actual HAP emissions from the preceding 12 months using Equation 1 of 40 CFR 63.57 (0(b): Actual HAP Emissions = (PVr x Mr) + (PVpg x Mpg) # (PVcg x Mcg) + (PVtr x Mtr) + (PVtg x Mtg), where PVr = weighted-average MACT model point value for production resin used in the past 12 months; Mr = mass of production resin used in the past 12 months; PVpg = weighted-average MACT model point value for pigmented gel coat used in the past 12 months; Mpg = mass of pigmented gel coats used in the past 12 months; PVcg = weighted-average MACT model point value for clear gel coat used in the past 12 months; Mcg = mass of clear gel coats used in the past 12 months; PVtr = weighted-average MACT model point value for tooling resin used in the past 12 months; Mtr = mass of tooling resins used in the past 12 months: PVtg = weighted-average MACT model point value for tooling gel coat used in the past 12 months; and Mtg = mass of tooling gel coats used in the past 12 months. All mass units are in megagrams and all weighted-average MACT model point values are in kilograms per megagram. [40 CFR 63:5710(b)] Federally Enforceable Through Title V Permit
- 11. The weighted-average MACT point values for each resin or gel coat used by this facility shall be determined using Equation 2 of 40 CFR 63.5710(c): Weighted-Average MACT Point Value (PVr, PVpg, PVcg, PVtr and PVtg) = [summation of (Mix PVi)] / [summation of Mi], where Mi = mass of each resin or gel coat used within the past 12 months, in megagrams; and PV = MACT model point value for each resin or gel coat used within the past 12 months, in kilograms of HAP per megagram of material applied. [40 CFR 63.5710(c)] Federally Enforceable Through Title V Permit
- 12. The MACT model point values for all resins and gel coats applied shall be determined using the formulas listed in Table 3 of 40 CFR 63, Subpart VVVV; atomized resin - [0.014 x (Resin HAP%, by weight)^2.425]; atomized resin, plus vacuum bagging with roll out - [0.01185 x (Resin HAP%, by weight)^2.425]; atomized resin, plus vacuum bagging without roll out - 10.00945 x (Resin HAP%, by weight)^2.425]; nonatomized resin - 10.014 x (Resin HAP%, by weight)^2.275]; nonatomized resin, plus bagging with roll out - [0.0110 x (Resin HAP%, by weight)^2.275; nonatomized resin, plus bagging without roll out - [0.0076 x (Resin HAP%, by weight)^2.275. [40 CFR 63.5710(d)] Federally Enforceable Through Title V Permit
- 13. Permittee shall use cleaning solvents that contain no more than 5% by weight of organic HAP content for routine cleaning of resin and gel coat application equipment. For removal of cured resin and gel coat from application equipment, no organic HAP content limit applies. [40 CFR 63.5734(a)] Federally Enforceable Through Title V Permit
- 14. Organic HAP-containing solvents used for removing cured resin or gel coat shall be stored in containers with covers. The covers must have no visible gaps and shall be in place at all times, except when equipment to cleaned is placed in or removed from the container. On containers with a capacity greater than 2 gallons, the distance from the top of the container to the solvent surface must be equal to or greater than 0.75 times the diameter of the container, f40 CFR 63.5734(b)] Federally Enforceable Through Title V Permit
- 15. All gel coat and resin mixing containers with a capacity equal to or greater than 55 gallons, including those used for on-site mixing of putties and polyputties shall have a cover. The covers shall have no visible gaps and shall be in place at all times, except when material is being manually added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container, [40 CFR 63.5731(a)(b)] Federally Enforceable Through Title V Permit
- 16. At least once per month, 55 gallon or greater mixing containers and containers holding organic HAP containing solvents used for removing cured resin or gel coat must be inspected to ensure the covers have no visible gaps. Records of the inspections and any repairs made to the covers must be kept. [40 CFR 63.5731(c)(d) and 63.5737(c)] Federally Enforceable Through Title V Permit
- 17. Permittee shall use adhesives that contain no more than 5% by weight of organic HAP content for all carpet and fabric operations. [40 CFR 63.5740(a)] Federally Enforceable Through Title V Permit
- 18. Permittee shall maintain a record of the organic HAP content of cleaning solvents used for routine cleaning of resin and gel coat application equipment and adhesives used for all carpet and fabric operations, [40 CFR 63.5737(a) and 63.5740(b)] Federally Enforceable Through Title V Permit
- 19. Permittee shall determine HAP content of affected materials using one or more of the methods outlined in 40 CFR 63.5758. [40 CFR 63.5758] Federally Enforceable Through Title V Permit

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

Location: 455 GROGAN AVENUE MERCED, CA

Facility Name: FINELINE INDUSTRIES, INC.

- 20. Permittee shall submit a notification of compliance status to the District no later than 30 days after the end of the first 12-month averaging period. The notification shall include the following: type and quantity of HAP's emitted at the facility; the method used to determine compliance; the method that will be used to determine continuing compliance; and a statement by the permittee as to whether the facility has complied with the HAP content limits. If there is a change to information submitted in the notification, changes shall be submitted in writing within 15 days after the change. [40 CFR 63.5761] Federally Enforceable Through Title V Permit
- 21. Permittee shall submit a compliance report to the District every 6 months. The first compliance report shall be submitted no later than 60 days after 12/31/05. Each subsequent report shall cover the applicable semiannual reporting period from January 1 through June 30 or from July 1 through December 31. Each subsequent compliance report shall be submitted no later than 60 days after the end of the semiannual reporting period. [40 CFR 63.5764(b)] Federally Enforceable Through Title V Permit
- 22. The compliance report shall include the following information: (1) Company name and address; (2) Signed and dated statement by a responsible official certifying the truth, accuracy, and completeness of the report; (3) Dates covered by the compliance report; (4) Description of any changes in the manufacturing process since the last compliance report; (5) Table or statement showing, for each regulated operation, the applicable organic HAP content limit and application equipment requirement with which the facility is complying and the actual weighted-average organic HAP content for each operation during each of the rolling 12-month averaging periods that end during the reporting period; (6) If compliance is achieved during the reporting period, a statement indicating such effect shall be included with the report; and (7) If any of the regulated operations were not in compliance during the reporting period, the following shall be included with the semiannual compliance report: (i) Operation(s) involved in the deviation; (ii) quantity, organic HAP content, and application method of the materials involved in the deviation; (iii) actions taken to minimize the deviation and to prevent it in the future; and (iv) Statement of whether or not the facility was in compliance for the 12-month averaging period that ended at the end of the reporting period. [40 CFR 63 5764(c)] Federally Enforceable Through Title V Permit
- 23. The following exemptions apply to the gel coat and resin operations: (1) Gel coat materials used for part/mold repair and touch up shall be exempt from the organic HAP content limits. The total gel coat materials used in this exemption shall not exceed 1 percent by weight of all gel coat used at the facility on a 12-month rolling-average basis. Records shall be kept of the amount of gel coats used per month for which this exemption is being used and copies of calculations showing that the exempt amount does not exceed 1 percent of all gel coat used. (2) Pure 100% vinylester resin used for skin coats. The total resin materials included in the exemption shall not exceed 5% by weight of all resin used at the facility on a 12-month rolling-average basis. Records shall be kept of the amount of 100 percent vinylester skin coat used per month for which this exemption is being used and copies of calculations showing that the exempt amount does not exceed 5% percent of all resin used. [40 CFR 63.5698(d)] Federally Enforceable Through Title V Permit
- 24. Permittee shall maintain the following records; in addition to those records required by conditions of this permit: (1) a copy of each notification and report submitted to the District; (2) Support documentation for any notice or report submitted to the District; (3) Total amounts of each production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat used per month and the weighted-average organic HAP content for each operation, expressed as weight percent (this record is not required for an operation if all materials used for that operation comply with the organic HAP content requirements); (4) for production resin and tooling resin the amounts of each applied by atomized or nonatomized methods, [40 CFR 63,5767] Federally Enforceable Through Title V Permit
- 25. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2520, 9.4.2 and 4684] Federally Enforceable Through Title V Permit

**PERMIT UNIT: N-1246-2-3** 

**EXPIRATION DATE: 09/30/2014** 

**EQUIPMENT DESCRIPTION:** 

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

### PERMIT UNIT REQUIREMENTS

- 1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
- The monomer content of polyester materials used at this facility shall be equal to or less than the following: for polyester resins, 35% by weight; for pigmented gel coats, 45% by weight; for specialty resins and clear gel coats, 50% by weight. [District Rule 4684, 5.1.1.1] Federally Enforceable Through Title V Permit
- 3. Spray application of polyester resin shall only be performed using airless, air assisted airless, or high-volume low-pressure (HVLP) spray equipment. [District Rule 4684, 5.1.2] Federally Enforceable Through Title V Permit.
- 4. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 25 g/l (0.21 lb/gal), repair and maintenance cleaning: 25 g/l (0.21 lb/gal), and cleaning of polyester resin application equipment: 25 g/l (0.21 lb/gal). [District Rule 4684, 5.3.1] Federally Enforceable Through Title V Permit
- 5. Permittee shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in self-closing, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4684, 5.4] Federally Enforceable Through Title V Permit
- 6. Permittee shall maintain the following records: daily records of the type and quantity of all coatings, resins, catalysts, and cleaning materials used in each operation; records of the VOC content, in weight percent, of all polyester resin materials used or stored at the facility; records of the VOC content of all cleaning materials used and stored at the facility. [District Rule 4684, 6.1] Federally Enforceable Through Title V Permit
- 7. Compliance using the emissions averaging requirements of 40 CFR Part 63, Subpart VVVV shall be demonstrated on a 12-month rolling-average basis and shall be determined at the end of every month (12 times per year). The first 12-month period begins on August 23, 2004. [40 CFR 63.5710(a)] Federally Enforceable Through Title V Permit
- 8. On August 23, 2005 and at the end of every subsequent month, permittee shall use Equation 1 of 40 CFR 63.5710(b) to demonstrate that the organic HAP emissions from this facility do not exceed the organic HAP emission limit determined by Equation 1 of 40 CFR 63.5698(b), for the same 12-month period. [40 CFR 63.5710(b)] Federally Enforceable Through Title V Permit
- 9. The organic HAP emissions from this facility shall not exceed the limit established by Equation 1 of 40 CFR 63.5698(b): HAP Limit = [(46 x Mr) + (159 x Mpg) + (291 x Mcg) + (54 x Mtr) + (214 x Mtg)], where Mr = mass of production resins used in the past 12 months; Mpg = mass of clear gel coats used in the past 12 months; Mtr = mass of tooling resins used in the past 12 months: and Mtg = mass of tooling gel coats used in the past 12 months. All units are in megagrams. [40 CFR 63.5698(b)] Federally Enforceable Through Title V Permit

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

Facility Name: FINELINE INDUSTRIES, INC.
Location: 455 GROGAN AVENUE MERCED, CA N-1746-2-1, Nov 2 2010 8 48AMI-SIOMOCOJ

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

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

Facility Name\* FINELINE INDUSTRIES, INC. Location: 455 GROGAN AVENUE MERCED, CA (1/1746-73, No. -) 2010 9 40AM - BIDIOCOJ

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







### **AUTHORITY TO CONSTRUCT**

PERMIT NO: N-1246-3-4

ISSUANCE DATE: 11/04/2014

LEGAL OWNER OR OPERATOR: FINELINE INDUSTRIES, INC.

**MAILING ADDRESS:** 

**455 GROGAN AVENUE MERCED, CA 95341** 

LOCATION:

**455 GROGAN AVENUE** 

MERCED, CA

**EQUIPMENT DESCRIPTION:** 

MODIFICATION OF GRINDING OPERATION SERVED BY SPRAY BOOTH #3 (BLEEKER BROS. STANDARD F-12-7. 2HP). RELOCATE THE OPERATION INSIDE A BUILDING WITH FILTERS DUCTED TO TWO GLOBAL FINISHING SYSTEMS BLOWER DISCHARGE STACKS. THE POST-PROJECT EQUIPMENT DESCRIPTION WILL BE: FIBERGLASS GRINDING OPERATION CONDUCTED INSIDE A BUILDING WITH FILTERS DUCTED TO TWO GLOBAL FINISHING SYSTEMS BLOWER DISCHARGE STACKS

#### CONDITIONS

- The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
- 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]
- Visible emissions from each discharge stack serving the grinding operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rules 2201 and 4101]
- The grinding operation shall be conducted inside a building area which is partitioned from the main building with a solid wall containing roll up doors and a walk in door. The wall shall completely seal the cross sectional area between the roof and the floor, with an exception of any necessary natural draft openings (NDO) needed to bring make-up air into the grinding area. [District Rule 2201]
- The direction of make-up air flow through each NDO shall occur into the grinding area. [District Rule 2201]

#### CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (208) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This IS NOT & 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

Arnaud Marjollet, Director of Permil Services

Northern Regional Office • 4800 Enterprise Way • Modesto, CA 95356-6718 • (209) 557-6400 • Fax (209) 557-6475

- 8. Within 15-days of startup under this permit, the owner or operator shall prepare and keep a sketch of the grinding area showing each NDO, direction of airflow through each NDO, and measured air velocity across each NDO. [District Rule 2201]
- 9. The grinding area laden air shall be discharged through the filters prior to being released into the atmosphere. [District Rule 2201]
- 10. The exhaust blowers shall be switched on prior to the start of the grinding operation. [District Rule 2201]
- 11. All filters shall be properly maintained and must be in place during the grinding operation. [District Rule 2201]
- 12. A spare set of filters shall be maintained on the premises at all times. [District Rule 2201]
- 13. PM 10 emissions from this operation shall not exceed 0.26 pounds per pound of fiberglass waste collected from the floor. [District Rule 2201]
- 14. The quantity of fiberglass waste collected from the floor shall not exceed 10 pounds in any one day. [District Rule 2201]
- 15. The owner or operator shall keep a daily record of the quantity of fiberglass waste collected from the floor in pounds.

  [District Rule 2201]
- 16. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

**PERMIT UNIT:** N-1246-4-2

**EXPIRATION DATE: 09/30/2014** 

**EQUIPMENT DESCRIPTION:** 

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

### PERMIT UNIT REQUIREMENTS

Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

**PERMIT UNIT: N-1246-5-3** 

EXPIRATION DATE: 09/30/2014

**EQUIPMENT DESCRIPTION:** 

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

### PERMIT UNIT REQUIREMENTS

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

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

Facility Name: FINELINE INDUSTRIES, INC.
Location: 455 GROGAN AVENUE, MERCED, CA
11746-5-2: Nov 2 2010 is 47445 - 51000COJ

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



**PERMIT UNIT: N-1246-8-0** 

**EXPIRATION DATE: 09/30/2014** 

#### **EQUIPMENT DESCRIPTION:**

FIBERGLASS LAMINATION OPERATION UTILIZING OPEN MOLDS WITH MANUAL RESIN APPLICATION (HAND LAYUP) AND MECHANICAL NON-ATOMIZED RESIN APPLICATION WITH FLUID IMPINGEMENT TECHNOLOGY (FIT) CHOPPER GUNS (SPRAY LAYUP) FOR THE MANUFACTURING OF BOAT BODIES.

#### PERMIT UNIT REQUIREMENTS

- 1. The monomer content of the polyester resins used at the facility shall be equal to or less than the following: (a). For polyester resins 35% by weight; (b). For specialty resins (as defined in Rule 4684) 50% by weight. [District Rule 4684] Federally Enforceable Through Title V Permit
- 2. Application of the polyester resins shall only be performed using the following methods: (a) Hand layur application techniques; (b). Non-atomizing spray application; or (c). Any equivalent method as approved by the APCO. [District Rule 4684] Federally Enforceable Through Title V Permit
- 3. The permittee shall not use organic solvents that exceed any of the following limits: (a). For product cleaning during manufacturing process or surface preparation for coating application: 25 g/l; (b). For repair and maintenance cleaning: 25 g/l; (c) For cleaning of polyester resin application equipment: 25 g/l. [District Rule 4684] Federally Enforceable Through Title V Permit
- 4. Permittee shall store and dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as paper, cloth, etc., catalysts, hardeners, and thinners in self-closing, non-absorbent, and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4684] Federally Enforceable Through Title V Permit
- 5. Permittee shall maintain the following records: daily records of the type and quantity of all resins, catalysts, and cleaning materials used in each operation; records of the VOC content (in weight percent) of all polyester resin materials, including the weight percent of non-monomer VOC of the resin materials, used or stored at the facility; records of the VOC content of all cleaning materials used and stored at the facility. [District Rule 4684] Federally Enforceable Through Title V Permit
- 6. Compliance using the emissions averaging requirements of 40 CFR Part 63, Subpart VVVV shall be demonstrated on a 12-month rolling-average basis and shall be determined at the end of every month (12 times per year). The first 12-month period begins on August 23, 2004. [40 CFR 63.5710(a)] Federally Enforceable Through Title V Permit
- 7. At the end of every subsequent month, the permittee shall use Equation 1 of 40 CFR 63.5710(b) to demonstrate that the organic HAP emissions from this facility do not exceed the organic HAP emission limit determined by Equation 1 in 40 CFR 63.5698, for the same 12-month period. [40 CFR 63.5710(b)] Federally Enforceable Through Title V Permit
- 8. The organic HAP emissions from this facility shall not exceed the limit established by Equation 1 of 40 CFR 63.5698(b) excluding the exempt materials specified in 40 CFR 63.5698(d): HAP Limit = [(46 x Mr) + (159 x Mpg) + (291 x Mcg) + (54 x Mtr) + (214 x Mtg)], where Mr = mass of production resins used in the past 12 months; Mpg = mass of pigmented gel coats used in the past 12 months; Mcg = mass of tooling resins used in the past 12 months and Mtg = mass of tooling gel coats used in the past 12 months. All units are in megagrams. [40 CFR 63.5698(b)] Federally Enforceable Through Title V Permit

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

Facility Name: FINELINE INDUSTRIES, INC.
Location: 455 GROGAN AVENUE MERCED, CA

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

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

Facility Name: FINELINE INDUSTRIES, INC.
Location: 455 GROGAN AVENUE MERCED, CA
N 1248-6-7-Dec 30 2010 9 944M - CHONK

- 19. Permittee shall submit a notification of compliance status to the District no later than 30 days after the end of the first 12-month averaging period. The notification shall include the following: type and quantity of HAP's emitted at the facility; the method used to determine compliance; the method that will be used to determine continuing compliance; and a statement by the permittee as to whether the facility has complied with the HAP content limits. If there is a change to information submitted in the notification, changes shall be submitted in writing within 15 days after the change. [40 CFR 63:5761] Federally Enforceable Through Title V Permit
- 20. Permittee shall submit a compliance report to the District every 6 months. The first compliance report shall be submitted no later than 60 days after 12/31/05. Each subsequent report shall cover the applicable semiannual reporting period from January 1 through June 30 or from July 1 through December 31. Each subsequent compliance report shall be submitted no later than 60 days after the end of the semiannual reporting period. [40 CFR 63:5764(b)] Federally Enforceable Through Title V Permit
- 21. The compliance report shall include the following information: (1) Company name and address; (2) Signed and dated statement by a responsible official certifying the truth, accuracy, and completeness of the report; (3) Dates covered by the compliance report; (4) Description of any changes in the manufacturing process since the last compliance report; (5) Table or statement showing, for each regulated operation, the applicable organic HAP content limit and application equipment requirement with which the facility is complying and the actual weighted-average organic HAP content for each operation during each of the rolling 12-month averaging periods that end during the reporting period; (6) If compliance is achieved during the reporting period, include a statement of compliance in the report; and (7) If any of the regulated operations were not in compliance during the reporting period, the following shall be included with the semiannual compliance report: (i) Operation(s) involved in the deviation; (ii) quantity, organic HAP content, and application method of the materials involved in the deviation; (iii) actions taken to minimize the deviation and to prevent it in the future; and (iv) Statement of whether or not the facility was in compliance for the 12-month averaging period that ended at the end of the reporting period. [40 CFR 63.5764(c)] Federally Enforceable Through Title V Permit
- The following exemptions apply to gel coat and resin operations: (1) Pigmented, clear, and tooling gel coat materials used for part/mold repair and touch up shall be exempt from the organic HAP content limits. The total gel coat materials used in this exemption shall not exceed 1 percent by weight of all gel coat used at the facility on a 12-month rolling-average basis. Records shall be kept of the amount of gel coats used per month for which this exemption is being used and copies of calculations showing that the exempt amount does not exceed 1 percent of all gel coat used.; (2) Pure 100% vinylester resin used for skin coats. The total resin materials included in the exemption shall not exceed 5% by weight of all resin used at the facility on a 12-month rolling-average basis. Records shall be kept of the amount of 100 percent vinylester skin coat used per month for which this exemption is being used and copies of calculations showing that the exempt amount does not exceed 5% percent of all resin used. [40 CFR 63.5698(d)] Federally Enforceable Through Title V Permit
- 23. Permittee shall maintain the following records, in addition to those records required by conditions of this permit: (1) a copy of each notification and report submitted to the District; (2) Support documentation for any notice or report submitted to the District; (3) Total amounts of each production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat used per month and the weighted-average organic HAP content for each operation, expressed as weight percent; (4) for production resin and tooling resin the amounts of each applied by atomized or nonatomized methods. [40 CFR 63.5767] Federally Enforceable Through Title V Permit
- 24. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070 and 4684 and 40 CFR 63.5770] Federally Enforceable Through Title V Permit

### ATTACHMENT C

**Detailed Facility List** 

### SJVUAPCD NORTHERN

### Detailed Facility Report For Facility=1246

6/23/15 9:40 am

Sorted by			

FINELINE INDU 455 GROGAN / MERCED, CA	to the Additional transfer of the Control of the Co		i . j.v. nbig mi	# TUS: EPHONE:	N 1246 A 2093840255		TYPE: TitleV EXPIRE ON: 09/30/2014 TOXIC ID: 44 AREA: 7 / INSP. DATE: 05/16
PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
N-1246-1-3	3)HP	3020-01 A	1	87.00	87:00	*- <b>A</b>	GEL COAT OPERATION SERVED BY SPRAY BOOTH #1 (BLEEKER BROS: STANDARD F-20-7, 3HP)
Ñ-1246-2-3	3 HP	3020-01 A	4	87.00	87.00	A,	GEL COAT OPERATION SERVED BY SPRAY BOOTH #2 (BLEEKER BROS. STANDARD F-20-7, 3 HP)
N-1246-3-2	2 HP	3020-01 A	si i	87.00	87.00	· <b>A</b>	GRINDING OPERATION SERVED BY SPRAY BOOTH #3 (BLEEKER BROS. STANDARD F-12-7, 2HP)
N-1246-4-2	10 HP	3020-01 A	<b>/1</b> :	87.00	87.00	·A	WOODWORKING OPERATION CONSISTING OF ONE (1) TABLE SAW, ONE (1) BAND SAW, ONE (1) MITRE SAW, TWO (2) WORMDRIVE SAWS, ONE (1) SKILL SAW, AND TWO (2) SANDERS
N-1246-5-3	16:75 HP	3020-01 A	4	87.00	87.00	A	WOODWORKING OPERATION CONSISTING OF ONE (1) ROUTER, ONE (1) CHOP SAW, AND ONE (1) BAND SAW. THE ROUTER IS SERVED BY A MURPHY RODGERS, MODEL NO. MRT-9A, DUST COLLECTOR
N-1246-8-0	Total Electric Motors: 50 hp	3020-01 C	1,	197:00	197,00	: <b>A</b> :	FIBERGLASS LAMINATION OPERATION UTILIZING OPEN MOLDS WITH MANUAL RESIN APPLICATION (HAND LAYUP) AND MECHANICAL NON-ATOMIZED RESIN APPLICATION WITH FLUID IMPINGEMENT TECHNOLOGY (FIT) CHOPPER GUNS (SPRAY LAYUP) FOR THE MANUFACTURING OF BOAT BODIES.

Number of Facilities Reported: 1