San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

SEP 12 2017

Ms. Angel Tapoozian
Scelzi Enterprises Inc
2286 E Date Ave
Fresno, CA 93706

Re: Proposed ATC / Certificate of Conformity (Significant Mod)
District Facility # C-1080
Project # C-1171970

Dear Ms. Tapoozian:

Enclosed for your review is the District's analysis of an application for Authorities to Construct (ATCs) for the facility identified above. You requested that Certificates of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. The ATCs in the project authorize the installation of two new motor vehicle and mobile equipment coating operations, each with a spray booth and one with a 3.0 MMBtu/hr booth heater and establishing a facility-wide PM10 emissions limit.

After addressing all comments made during the 30-day public notice and the 45-day EPA comment periods, the District intends to issue the Authorities to Construct with Certificates of Conformity. Please submit your comments within the 30-day public comment period, as specified in the enclosed public notice. Prior to operating with modifications authorized by the Authorities to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

If you have any questions, please contact Mr. Errol Villegas, Permit Services Manager, at (559) 230-5900.

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

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

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

www.valleyair.org www.healthyairliving.com

Thank you for your cooperation in this matter.

Sincerely,

Arnaud Marjollet
Director of Permit Services

Enclosures

cc: Tung Le, CARB (w/enclosure) via email
cc: Gerardo C. Rios, EPA (w/enclosure) via email

San Joaquin Valley Air Pollution Control District
Authority to Construct Application Review
Motor Vehicle and Mobile Equipment Coating Operation with a Heated Paint Booth

Facility Name:	Scelzi Enterprises, Inc.	Date:	September 11, 2017
Mailing Address:	2286 E Date Ave Fresno, CA 93706	Engineer: Lead Engineer:	Jesse A. Garcia Joven Refuerzo
Contact Person:	Angel Tapoozian		
Telephone:	(559) 237-5541 or (559) 281-3698		
E-Mail:	angelt@seinc.com		
Application #:	C-1080-1-4, -2-5, -4-2, -7-2, -9-2, -10-2, -11-0, -12-0		
Project #:	C-1171970		
Deemed Complete:	July 25, 2017		

I. Proposal

The primary business of this existing facility, Scelzi Enterprises, Inc. (Scelzi), is the manufacturing of truck bodies. The facility is applying for two Authorities to Construct (ATCs) for two motor vehicle and mobile equipment painting operations, each with a heated paint spray booth.

One paint booth (C-1080-11) is equipped with a 3 MMBtu/hr natural gas-fired booth heater while the other (C-1080-12) is equipped with a permit-exempt natural gas-fired booth heater (low emitting unit, < 20 MMBtu/day heat input). The coating booth with a natural gas-fired booth heater listed under permit C-1080-7 is also being proposed to be limited to less than 20 MMBtu/day heat input to become permit exempt. See Section VIII, Rule 2020 for additional details.

Additionally, the facility is proposing to establish a facility-wide annual PM_{10} emissions limit to be below the major source threshold for units -1, -2, -4, -7, -9, -10, and establish daily PM_{10} limits for units -1, -4 and -9 (see Appendix H for existing permits).

Scelzi has already received their Title V permit. This modification can be classified as a Title V significant modification pursuant to Rule 2520, and can be processed with a Certificate of Conformity (COC). Since the facility has specifically requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct. Scelzi must apply to administratively amend their Title V permit.

II. Applicable Rules

Rule 2020	Exemptions (12/18/14)
Rule 2201	New and Modified Stationary Source Review Rule (2/18/16)
Rule 2410	Prevention of Significant Deterioration (6/16/11)
Rule 2520	Federally Mandated Operating Permits (6/21/01)

Rule 4102	Nuisance (12/17/92)
Rule 4201	Particulate Matter Concentration (12/17/92)
Rule 4301	Fuel Burning Equipment (12/17/92)
Rule 4309	Dryers, Dehydrators, and Ovens (12/15/2005)
Rule 4612	Motor Vehicle and Mobile Equipment Coating Operations (10/21/10)
Rule 4801	Sulfur Compounds (12/17/1992)
CH&SC 41700	Health Risk Assessment
CH&SC 42301.6	School Notice

Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines

III. Project Location

The facility is located at 2286 E Date Avenue and 2772 S Cherry Avenue in Fresno, CA. The equipment is not located within 1,000 feet of the outer boundary of a K-12 school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

IV. Process Description

C-1080-1, -2, -4, -7, -9, -11, -12:
These paint spray booths are used solely for motor vehicles and associated parts and components. The paint spray operation occurs in two stages: surface preparation (including application of primer and sanding) and application of topcoat. The application of primer and the topcoat will take place inside of the paint spray booth. The mobile equipment coating operations have a booth heater, except for unit -9, where the coated parts are dried by the natural gas-fired booth heater.

C-1080-10:
Scelzi uses a laser cutter to cut galvanized and mild steel. The metal is cut (vaporized and/or melted) by the extreme temperatures of the laser cutter. A negative pressure develops at the cutting point that pulls the vaporized metal away from the sheet.

V. Equipment Listing

Pre-Project Equipment Description:

C-1080-1-3: MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATION WITH HVLP SPRAY GUN(S), A PAINT SPRAY BOOTH WITH DRY EXHAUST FILTERS, AN ENCLOSED SPRAY GUN CLEANER, AND A PERMIT EXEMPT NATURAL GAS DRYING BURNER < 20.0 MMBTU/DAY HEAT INPUT

C-1080-2-4: MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATION AND TRUCK BED LINER COATING OPERATION WITH HVLP SPRAY GUN(S), PLURAL COMPONENT APPLICATORS, A PAINT SPRAY BOOTH WITH DRY EXHAUST FILTERS AND A PERMIT EXEMPT NATURAL GAS DRYING BURNER < 20.0 MMBTU/DAY HEAT INPUT

C-1080-4-1: MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATION WITH HVLP SPRAY GUNS, A PAINT SPRAY BOOTH WITH DRY EXHAUST FILTERS, AN ENCLOSED SPRAY GUN CLEANER, A PERMIT EXEMPT NATURAL GAS DRYING BURNER < 20.0 MMBTU/DAY HEAT INPUT, AND AN ATTACHED DRYING ROOM WITH A PERMIT EXEMPT NATURAL GAS DRYING BURNER < 20.0 MMBTU/DAY HEAT INPUT

C-1080-7-1: MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATION WITH HVLP SPRAY GUN(S), A PAINT SPRAY BOOTH WITH DRY EXHAUST FILTERS, AN ATTACHED DRYING BOOTH WITH A 1.075 MMBTU/HR NATURAL GAS-FIRED DRYING BURNER AND AN ENCLOSED SPRAY GUN CLEANER

C-1080-9-1 MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATION (UNDERCOATING OPERATION) WITH AIRLESS SPRAY GUN(S) AND AN ENCLOSED SPRAY GUN CLEANER

C-1080-10-1: METAL CUTTING OPERATION CONSISTING OF ONE 40 KVA CINCINNATI MODEL CL-440 LASER CUTTER SERVED BY AN AIRGUARD MODEL MICRO GUARD 99 DUST COLLECTOR

Proposed Modification:

C-1080-1-4: MODIFICATION OF MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATION WITH HVLP SPRAY GUN(S), A PAINT SPRAY BOOTH WITH DRY EXHAUST FILTERS, AN ENCLOSED SPRAY GUN CLEANER, AND A PERMIT EXEMPT NATURAL GAS DRYING BURNER < 20.0 MMBTU/DAY HEAT INPUT: ESTABLISH A DAILY PM10 EMISSION LIMIT AND A FACILITY-WIDE PM10 EMISSION LIMIT

C-1080-2-5: MODIFICATION OF MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATION AND TRUCK BED LINER COATING OPERATION WITH HVLP SPRAY GUN(S), PLURAL COMPONENT APPLICATORS, A PAINT SPRAY BOOTH WITH DRY EXHAUST FILTERS AND A PERMIT EXEMPT NATURAL GAS DRYING BURNER < 20.0 MMBTU/DAY HEAT INPUT: ESTABLISH A FACILITY-WIDE PM10 EMISSION LIMIT

C-1080-4-2: MODIFICATION OF MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATION WITH HVLP SPRAY GUNS, A PAINT SPRAY BOOTH WITH DRY EXHAUST FILTERS, AN ENCLOSED SPRAY GUN CLEANER, A PERMIT EXEMPT NATURAL GAS DRYING BURNER < 20.0 MMBTU/DAY HEAT INPUT, AND AN ATTACHED DRYING ROOM WITH A PERMIT EXEMPT NATURAL GAS DRYING BURNER < 20.0 MMBTU/DAY HEAT INPUT: ESTABLISH A DAILY PM10 EMISSION LIMIT AND A FACILITY-WIDE PM10 EMISSION LIMIT

C-1080-7-2: MODIFICATION OF MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATION WITH HVLP SPRAY GUN(S), A PAINT SPRAY BOOTH WITH DRY EXHAUST FILTERS, AN ATTACHED DRYING BOOTH WITH A 1.075 MMBTU/HR NATURAL GAS-FIRED DRYING BURNER AND AN ENCLOSED SPRAY GUN CLEANER: ESTABLISH A FACILITY-WIDE PM10 EMISSION LIMIT AND DESIGNATE THE NATURAL GAS DRYING BURNER AS PERMIT EXEMPT (< 20.0 MMBTU/DAY HEAT INPUT)

C-1080-9-2 MODIFICATION OF MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATION (UNDERCOATING OPERATION) WITH AIRLESS SPRAY GUN(S) AND AN ENCLOSED SPRAY GUN CLEANER: ESTABLISH A DAILY PM10 EMISSION LIMIT AND A FACILITY-WIDE PM10 EMISSION LIMIT

C-1080-10-2: MODIFICATION OF METAL CUTTING OPERATION CONSISTING OF ONE 40 KVA CINCINNATI MODEL CL-440 LASER CUTTER SERVED BY AN AIRGUARD MODEL MICRO GUARD 99 DUST COLLECTOR: ESTABLISH A FACILITY-WIDE PM10 EMISSION LIMIT

C-1080-11-0: MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATION WITH A PAINT SPRAY BOOTH WITH DRY EXHAUST FILTERS AND A 3.0 MMBTU/HR NATURAL GAS-FIRED BOOTH HEATER

One 50' L X 28' W X 16' H paint spray booth
5 hp x 4 exhaust fans
Dry filter system
Approved HVLP spray guns
80 hp electric air compressor

C-1080-12-0: MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATION WITH A PAINT SPRAY BOOTH WITH DRY EXHAUST FILTERS AND A PERMIT EXEMPT NATURAL GAS-FIRED BOOTH HEATER (LESS THAN 20.0 MMBTU/DAY HEAT INPUT)

One 44' L X 16' W X 14' H paint spray booth
7.5 hp exhaust fan
Dry filter system
Approved HVLP spray guns
80 hp electric air compressor

Post-Project Equipment Description:

C-1080-1-4: MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATION WITH A PAINT SPRAY BOOTH WITH DRY EXHAUST FILTERS AND A PERMIT EXEMPT NATURAL GAS-FIRED BOOTH HEATER (LESS THAN 20.0 MMBTU/DAY HEAT INPUT)

C-1080-2-5: MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATION INCLUDING A TRUCK BED LINER COATING OPERATION WITH A PAINT SPRAY BOOTH WITH DRY EXHAUST FILTERS AND A PERMIT EXEMPT NATURAL GAS-FIRED BOOTH HEATER (LESS THAN 20.0 MMBTU/DAY HEAT INPUT)

C-1080-4-2: MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATION WITH A PAINT SPRAY BOOTH WITH DRY EXHAUST FILTERS AND A PERMIT EXEMPT NATURAL GAS-FIRED BOOTH HEATER (LESS THAN 20.0 MMBTU/DAY HEAT INPUT) AND AN ATTACHED DRYING ROOM WITH A PERMIT EXEMPT NATURAL GAS-FIRED BOOTH HEATER (LESS THAN 20.0 MMBTU/DAY HEAT INPUT)

C-1080-7-2: MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATION WITH A PAINT SPRAY BOOTH WITH DRY EXHAUST FILTERS, AN ATTACHED DRYING BOOTH AND A PERMIT EXEMPT NATURAL GAS-FIRED BOOTH HEATER (LESS THAN 20.0 MMBTU/DAY HEAT INPUT)

C-1080-9-2 MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATION (UNDERCOATING OPERATION)

C-1080-10-2: METAL CUTTING OPERATION CONSISTING OF ONE 40 KVA CINCINNATI MODEL CL-440 LASER CUTTER SERVED BY AN AIRGUARD MODEL MICRO GUARD 99 DUST COLLECTOR

C-1080-11-0: MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATION WITH A PAINT SPRAY BOOTH WITH DRY EXHAUST FILTERS AND A 3.0 MMBTU/HR NATURAL GAS-FIRED BOOTH HEATER

C-1080-12-0: MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATION WITH A PAINT SPRAY BOOTH WITH DRY EXHAUST FILTERS AND A PERMIT EXEMPT NATURAL GAS-FIRED BOOTH HEATER (LESS THAN 20.0 MMBTU/DAY HEAT INPUT)

VI. General Calculations

A. Assumptions

- For units with no existing daily limits on the permit, as a worst case, the PE1 = PE2
- For units -1 and -4 the daily VOC limit of 149.0 lb/day will remain unchanged and a limit of 50.0 lb-PM_{10}/day will be added (as proposed by applicant)
- For unit -2, the daily limits of 50.0 lb-VOC/day and 14.5 lb-PM_{10}/day from the current permit will remain unchanged
- For unit -7, the daily limits of 99.0 lb-VOC/day and 23.3 lb-PM_{10}/day from the current permit will remain unchanged
- For unit -9, as a worst case, the pre-project emission limits will equal the post-project emission limits of 50 lb-PM_{10}/day and 149.0 lb-VOC/day (as proposed by the applicant)
- For unit -10, the daily PM_{10} limit of 0.013 lb-PM_{10}/day from the current permit will remain unchanged
- For unit -11-0, total VOC emissions are limited to 149.0 lb/day and VOC emissions from coating/priming are limited to 34,320 lb/year (proposed by the applicant)
- For unit -11-0, PM_{10} emissions are limited to 1,314 lb/year (proposed by the applicant)
- For unit -12-0, although the proposed coating has 0 VOC emissions, the permit will be limited to 40.0 lb/day and 10,400 lb/year for future flexibility (as proposed by the applicant)
- For unit -12-0, the applicant has proposed a usage limit of 25 gallons/day
- The applicant is proposing a facility-wide PM10 emission limit of 29,199 lb/year
- HVLP gun transfer efficiency (TE) is 75% (per STAPPA/ALAPCO Vol. 2, pg. 14-7, 5/30/91)
- The TE of the Graco Plural Component spray application equipment used for the truck bed lining operation, units -2 and -12, is expected to be 80% (reference District project N-1021308 for similar application equipment for this class and category of operation)
- Dry exhaust filter removal efficiency (RE) is 95% (March 26, 2006 Memorandum to EPA, 'Review of Spray Booth Filter Information for the Area Source Motor Vehicle and Mobile Equipment Refinishing National Emission Standards for Hazardous Air Pollutants (NESHAP))

B. Emission Factors

C-1080-1, -2, -4, -7, -9:
The emission factors for the coating operations are the VOC limits from Rule 4612 and stated on the permits. These emission factors are not being proposed to be changed with this project.

C-1080-1, -2, -4, -7, -11, -12:
The emission factors for the combustion of natural gas in the booth heaters are as follows:

Burner Emission Factors		
Operation	Emission Rate	Source
Natural gas combustion in each heater	0.10 lb-NO_x/MMBtu	AP-42, Table 1.4-1 (7/98)
	0.00285 lb-SO_x/MMBtu	APR-1720 (12/01)
	0.0076 lb-PM_{10}/MMBtu	AP-42, Table 1.4-2 (7/98)
	0.084 lb-CO/MMBtu	AP-42, Table 1.4-1 (7/98)
	0.0055 lb-VOC/MMBtu	AP-42, Table 1.4-2 (7/98)

Since the booth heaters for units -1, -2, -4 and -12 are exempt, those emissions are calculated in Section VIII under Rule 2020.

C-1080-10:
District practice is to assume 15% of the metal removed during cutting is vaporized (fume) and the appropriate uncontrolled emission factor is: 0.15 lb-PM_{10}/lb metal removed.

Controlled emissions are calculated based on 99.97% control efficiency of the baghouse.

C-1080-11:
- PM_{10} emission factor (EF) for color coating (worst case) is 5.5 lb/gal, assuming all particulate matter (PM) emissions are PM_{10} (STAPPA/ALAPCO Vol. 2, pg. 14-4, 5/30/91)
- PM_{10} EF for primer (worst case) is 3.0 lb/gal, assuming all PM emissions are PM_{10} (STAPPA/ALAPCO Vol. 2, pg. 14-4, 5/30/91)
- Primer VOC content is 2.1 lb/gal (District Rule 4612 limit)

C-1080-12:

- The truck bed liner density = 10.3 lb/gal (assuming worst case of the two component coating)
- PM_{10} emission factor (EF) for truck bed liner (worst case) is 10.3 lb/gal (per manufacturer)

C. Calculations

1. Pre-Project Potential to Emit (PE1)

C-1080-1, -2, -4, -7, -9, -10:
The emission limits are summarized in the following table for PM_{10} and VOC where annual emissions = daily emissions x 365:

Permit Unit	Daily PM_{10} (lb/day)	Annual PM_{10} (lb/year)	Daily VOC (lb/day) [1]	Annual VOC (lb/year)
C-1080-1	50.0	18,250	149.0	54,385
C-1080-2	14.5	5,293	50.0	18,250
C-1080-4	50.0	18,250	149.0	54,385
C-1080-7	23.3	8,505	99.0	36,135
C-1080-9	50.0	18,250	149.0	54,385
C-1080-10	0.013 ≈ 0.0	5	0.0	0

C-1080-7:
PM_{10} and VOC emissions are presented in the table above and they include PM_{10} and VOC emissions from combustion. Additionally, there are emissions from the booth heater burner; therefore, the other pollutant emissions are calculated below:

$PE1_{Booth\ Heater}$ (lb/day) = EF (lb/MMBtu) x Heater Rating (MMBtu/hr) x Operation (hr/day)

Daily PE1 Natural Gas-Fired Booth Heater				
Pollutant	EF (lb/MMBtu)	Heater Rating (MMBtu/hr)	Daily Operation (hr/day)	PE1 (lb/day)
NO_x	0.1	1.075	24	2.6
SO_x	0.00285	1.075	24	0.1
CO	0.084	1.075	24	2.2

The annual pre project Potential to Emit (PE1) is determined by using the daily PE1 presented above and an operation of 365 day/year.

[1] Although, each permit has its own VOC limit, the facility-wide emissions are limited to 149.0 lb/day.

Annual PE1	
Pollutant	PE1 (lb/year)
NO_x	949
SO_x	37
PM_{10}	8,505*
CO	803
VOC	36,135*

* These emissions are included within the facility-wide limit as stated above.

C-1080-11 & -12:
Since these are new units at this facility, the daily and annual pre-project emissions are zero for all criteria pollutants.

PE1 = 0.0 lb/day = 0 lb/year

2. Post Project Potential to Emit (PE2)

C-1080-1, -2, -4, -7, -9, -10:
The emission limits are summarized in the following table:

Permit Unit	Daily PM_{10} (lb/day)	Annual PM_{10} (lb/year)[2]	Daily VOC (lb/day)[3]	Annual VOC (lb/year)
C-1080-1	50.0	18,250	149.0	54,385
C-1080-2	14.5	5,293	50.0	18,250
C-1080-4	50.0	18,250	149.0	54,385
C-1080-7*	23.3	8,505	99.0	36,135
C-1080-9	50.0	18,250	149.0	54,385
C-1080-10	0.013 ≈ 0.0	5	0.0	0

* Post project emissions do not include NOx, SOx or CO since the facility has taken a limit of less than 20 MMBtu/day for the booth heater to become exempt.

C-1080-11 & -12:

a. Daily PE2 (lb/day)

C-1080-11:

Emissions from the 3.0 MMBtu/hr natural gas-fired booth heater ($PE2_{Booth\ Heater}$):

Daily PE2 from the booth heater is calculated using the following equation and summarized in the table below.

$PE2_{Booth\ Heater}$ (lb/day) = EF (lb/MMBtu) x Heater Rating (MMBtu/hr) x Operation (hr/day)

[2] The combined emissions from these units are limited by a facility-wide emissions are limited to 29,199 lb/year.
[3] Although, each permit has its own VOC limit, the facility-wide emissions are limited to 149.0 lb/day.

Daily PE2 Natural Gas-Fired Booth Heater				
Pollutant	EF (lb/MMBtu)	Heater Rating (MMBtu/hr)	Daily Operation (hr/day)	PE2 (lb/day)
NO_x	0.1	3.0	24	7.2
SO_x	0.00285	3.0	24	0.2
PM_{10}	0.0076	3.0	24	0.5
CO	0.084	3.0	24	6.0
VOC	0.0055	3.0	24	0.4

Emissions from the coating/priming operation ($PE2_{Coating/Priming}$):

The applicant has proposed to keep the current facility-wide limit of 149.0 lb-VOC/day and the coating VOC is 149.0 lb-VOC/day less the VOC emissions from natural gas combustion of 0.4 lb-VOC/day; therefore, VOC emissions from coatings = (149.0 – 0.4) lb-VOC/day = 148.6 lb-VOC/day.

Next, the PM_{10} emissions will be determined by back calculation using the maximum amount of color coatings or priming used on a daily basis.

Assuming All VOCs are from Coating:
The maximum daily color coating usage is determined using the VOC content from the Rule 4612 compliant coating that will result in the largest daily color coating usage. For this project, a VOC content of 2.1 lb/gal will be used.

Daily Coating Usage (gal/day) = $PE2_{Coating}$ (lb/day) ÷ Color Coating VOC Content (lb/gal)

Daily Coating Usage = 148.6 lb/day ÷ 2.1 lb/gal
= 70.8 gal/day

Next, the daily PM_{10} emissions from coating are determined:

$PE2_{Coating\ PM10}$ (lb/day) = Daily Coating Usage (gal/day) x Color Coating PM_{10} Content (lb/gal) x (1 – HVLP Transfer Efficiency) x (1 – Dry Filter Control Efficiency)

$PE2_{Coating\ PM10}$ = 70.8 gal/day x 5.5 lb/gal x (1 – 0.75) x (1 – 0.95)
= 4.9 lb-PM_{10}/day

Assuming All VOCs are from Priming:
The maximum daily priming usage is determined using the VOC content from the Rule 4612 complaint priming that will result in the largest daily color coating usage. For this project, a VOC content of 2.1 lb/gal will be used.

Daily Primer Usage (gal/day) = $PE2_{Primer}$ (lb/day) ÷ Primer VOC Content (lb/gal)

Daily Primer Usage = 148.6 lb/day ÷ 2.1 lb/gal
= 70.8 gal/day

Next, the daily PM_{10} emissions from the primer are determined:

$PE2_{Primer\ PM10}$ (lb/day) = Daily Primer Usage (gal/day) x Primer PM_{10} Content (lb/gal) x (1 – HVLP Transfer Efficiency) x (1 – Dry Filter Control Efficiency)

$PE2_{Primer\ PM10}$ = 70.8 gal/day x 3.0 lb/gal x (1 – 0.75) x (1 – 0.95)
= 2.7 lb-PM_{10}/day

Since coatings (as opposed to priming) results in the worst case PM_{10} emissions, the PE2 for the unit = **4.9 lb-PM_{10}/day**.

Daily PE2 from C-1080-11-0				
Pollutant	$PE2_{Booth\ Heater}$ (lb/day)	$PE2_{Priming}$ (lb/day)	$PE2_{Coating}$ (lb/day)	$PE2_{Total}$ (lb/day)
NO_x	7.2	0.0	0.0	7.2
SO_x	0.2	0.0	0.0	0.2
PM_{10}	0.5	4.9		5.4
CO	6.0	0.0	0.0	6.0
VOC	0.4	148.6		149.0

C-1080-12:

Emissions from the coating/priming operation ($PE2_{Coating/Priming}$):

As stated above, although the facility is proposing to use coating with 0 VOC, for future flexibility, the facility is proposing a limit of 40.0 lb-VOC/day and included within the existing facility-wide VOC limit of 149.0 lb/day. If the facility used Rule 4612 compliant coatings and the proposed 25 gal/day, the emissions could exceed 40.0 lb-VOC/day; therefore, this limit is considered reasonable.

PM_{10} emissions can be calculated based off the volume of coating applied, the coating PM_{10} content, the transfer efficiency and the dry filter control efficiency as follows:

$PE2_{Coating\ PM10}$ (lb/day) = Daily Coating Usage (gal/day) x Color Coating PM_{10} Content (lb/gal) x (1 – HVLP Transfer Efficiency) x (1 – Dry Filter Control Efficiency)

$PE2_{Coating\ PM10}$ = 25 gal/day x 10.3 lb/gal x (1 – 0.75) x (1 – 0.95)
= 3.2 lb-PM_{10}/day

b. Annual PE2 (lb/year)

C-1080-11:

Annual post project emissions from the new motor vehicle coating operation:

The annual post project Potential to Emit (PE2) for the booth heater is determined by using the daily PE2 calculated previously in Section VII.C.2.a and operation of 365 day/year. For the priming/coating, the limits are proposed by the applicant.

Annual PE2 for C-1080-11-0				
Pollutant	$PE2_{Booth\ Heater}$ (lb/year)	$PE2_{Priming}$ (lb/year)	$PE2_{Coating}$ (lb/year)	$PE2_{Total}$ (lb/year)
NO_x	2,628	0	0	2,628
SO_x	73	0	0	73
PM_{10}	183	1,314		1,497*
CO	2,190	0	0	2,190
VOC	146	34,320		34,466*

* These limits are included within the facility-wide SLC.

C-1080-12:

Annual post project emissions from the new motor vehicle coating operation:

The annual post project Potential to Emit (PE2) for PM_{10} is determined by using the daily PE2 calculated previously in Section VII.C.2.a and operation of 365 day/year.

As stated above, although the facility is proposing to use coatings with zero VOCs, for future flexibility, the facility is proposing a limit of 10,400 lb-VOC/year and included within the existing facility-wide VOC limit. The PM_{10} limit for this unit is also included within the facility-wide PM_{10} limit.

Annual PE2 for C-1080-12-0	
Pollutant	PE2 (lb/year)
NO_x	0
SO_x	0
PM_{10}	949
CO	0
VOC	10,400

3. Pre-Project Stationary Source Potential to Emit (SSPE1)

Pursuant to District Rule 2201, the SSPE1 is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of Emission Reduction Credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions (AER) that have occurred at the source, and which have not been used on-site. Pursuant to the calculations performed in Section VII.C.1 above, the SSPE1 is as follows:

Pre Project Stationary Source Potential to Emit [SSPE1] (lb/year)					
Permit Unit	**NO_X**	**SO_X**	**PM_{10}**	**CO**	**VOC**
C-1080-1	0	0	18,250	0	54,385
C-1080-2	0	0	5,293	0	
C-1080-4	0	0	18,250	0	
C-1080-7	949	37	8,505	803	
C-1080-9	0	0	18,250	0	
C-1080-10	0	0	5	0	0
Pre Project SSPE (SSPE1)	**949**	**37**	**68,553**	**803**	**54,385**

4. Post Project Stationary Source Potential to Emit (SSPE2)

Pursuant to District Rule 2201, the SSPE2 is the PE from all units with valid ATCs or PTOs at the Stationary Source and the quantity of ERCs, which have been banked since September 19, 1991 for AERs that have occurred at the source, and which have not been used on-site.

Post Project Stationary Source Potential to Emit [SSPE2] (lb/year)					
Permit Unit	**NO_X**	**SO_X**	**PM_{10}**	**CO**	**VOC**
C-1080-1	0	0	29,199	0	54,385
C-1080-2	0	0		0	
C-1080-4	0	0		0	
C-1080-7	0	0		0	
C-1080-9	0	0		0	
C-1080-11	2,628	73		2,190	
C-1080-12	0	0		0	
C-1080-10	0	0		0	0
Post Project SSPE (SSPE2)	**2,628**	**73**	**29,199**	**2,190**	**54,385**

5. Major Source Determination

Rule 2201 Major Source Determination:

Pursuant to District Rule 2201, a Major Source is a stationary source with a SSPE2 equal to or exceeding one or more of the following threshold values. For the purposes of determining major source status, the following shall not be included:

- Any ERCs associated with the stationary source,
- Emissions from non-road IC engines (i.e. IC engines at a particular site at the facility for less than 12 months),
- Fugitive emissions, except for the specific source categories specified in 40 CFR 51.165.

Rule 2201 Major Source Determination (lb/year)						
	NO_X	SO_X	PM_{10}	$PM_{2.5}$	CO	VOC
SSPE1	949	37	68,553	68,553	803	54,385
SSPE2	2,628	73	29,199	29,199	2,190	54,385
Major Source Threshold	20,000	140,000	140,000	140,000	200,000	20,000
Major Source?	No	No	No	No	No	Yes

Note: $PM_{2.5}$ assumed to be equal to PM_{10}

As seen in the table above, the facility is not an existing Major Source and is not becoming a Major Source as a result of this project.

Rule 2410 Major Source Determination:

The facility or the equipment evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21 (b)(1)(iii). Therefore the PSD Major Source threshold is 250 tpy for any regulated NSR pollutant.

PSD Major Source Determination (tons/year)						
	NO_2	VOC	SO_2	CO	PM	PM_{10}
Estimated Facility PE before Project Increase	0.5	27.2	0.0	0.4	34.3	34.3
PSD Major Source Thresholds	250	250	250	250	250	250
PSD Major Source?	N	N	N	N	N	N

As shown above, the facility is not an existing PSD major source for any regulated NSR pollutant expected to be emitted at this facility.

6. Baseline Emissions (BE)

BE = Pre-project Potential to Emit for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, located at a Major Source.

otherwise,

BE = Historic Actual Emissions (HAE), calculated pursuant to District Rule 2201.

C-1080-11 & -12
For the new units, BE = PE1 = 0 for all criteria pollutants.

For the existing units:

BE for NOx, SOx, PM_{10}, and CO
Since the facility is a non-major source for NOx, SOx, PM_{10}, and CO emissions, baseline emissions for each unit are equal to the pre-project potential to emit for these pollutants.

BE (lb/year)				
	NO_X	SO_X	PM_{10}	CO
C-1080-1	0	0	18,250	0
C-1080-2	0	0	5,293	0
C-1080-4	0	0	18,250	0
C-1080-7	949	37	8,505	803
C-1080-9	0	0	18,250	0
C-1080-10	0	0	5	0

BE for VOC Emissions
To be a Clean Emissions Unit for VOC, each unit must either be equipped with an emissions control technology with a minimum control efficiency of at least 95% or be equipped with an emission control technology that is Achieved-in-Practice BACT as accepted by the APCO during the five years prior to the submission of a complete application.

C-1080-1, -2, -4, -7, -9
The existing BACT Guideline 4.2.1 for Automotive Spray Painting Operation is included in Appendix C of this document and lists spray guns, coatings, cleaning materials, and solvents compliant with Rule 4612 as Achieved-in-Practice. All permits are limited to using spray equipment, coatings, cleaning materials and solvent compliant with Rule 4612; therefore, these units are clean for VOC emissions and $BE_{VOC} = PE1_{VOC}$.

C-1080-10
This cutting operation does not emit VOC emissions; therefore, a Clean Emissions Unit determination is not required and BE = PE1 = 0 lb/year.

7. SB 288 Major Modification

SB 288 Major Modification is defined in 40 CFR Part 51.165 as "any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act."

Since this facility is a major source for VOC, the project's PE2 is compared to the SB 288 Major Modification Threshold in the following table in order to determine if the SB 288 Major Modification calculation is required.

SB 288 Major Modification Thresholds			
Pollutant	**Project PE2 (lb/year)**	**Threshold (lb/year)**	**SB 288 Major Modification Calculation Required?**
VOC	54,385	50,000	Yes

Since the project's PE2 surpasses the SB 288 Major Modification Threshold for VOC, the Net Emissions Increase (NEI) will be compared to the SB 288 Major Modification threshold in order to determine if this project constitutes an SB 288 Major Modification.

The NEI is the total of emission increases for every permit unit addressed in this project and is calculated as follows:

NEI = PE2 – BAE

Where: PE2 = the sum of all the PE2s for each permit unit in this project
BAE = for units that are fully offset, the BAE = the PE1 for every unit, otherwise, the BAE is the actual annual emissions averaged over the baseline period for every unit.

The baseline period is the two year period preceding the application or another time period within the previous 5 or 10 year determined by the District to be more representative of normal operation. The emissions data from the last two Emissions Inventories submitted for 2016 and 2015 were 27,440 lb-VOC/year and 29,823 lb-VOC/year (see Appendix I). Therefore, the BAE = (27,440 + 29,823) lb-VOC/year ÷ 2 = 28,632 lb-VOC/year.

The BAE is used to calculate the NEI and make the SB 288 Major Modification determination in the following table.

SB 288 Major Modification Calculation and Determination					
Pollutant	**PE2 (lb/year)**	**BAE (lb/yr)**	**NEI (lb/yr)**	**Threshold (lb/yr)**	**SB 288 Major Modification?**
VOC	54,385	28,632	25,753	50,000	No

As demonstrated in the preceding table, this project does not constitute an SB 288 Major Modification.

8. Federal Major Modification

District Rule 2201 states that a Federal Major Modification is the same as a "Major Modification" as defined in 40 CFR 51.165 and part D of Title I of the CAA.

A Less-Than-Significant Emissions Increase exclusion is for an emissions increase for the project, or a Net Emissions Increase for the project (as defined in 40 CFR 51.165 (a)(2)(ii)(B) through (D), and (F)), that is not significant for a given regulated NSR pollutant, and therefore is not a federal major modification for that pollutant.

- To determine the post-project projected actual emissions from existing units, the provisions of 40 CFR 51.165 (a)(1)(xxviii) shall be used.
- To determine the pre-project baseline actual emissions, the provisions of 40 CFR 51.165 (a)(1)(xxxv)(A) through (D) shall be used.
- If the project is determined not to be a federal major modification pursuant to the provisions of 40 CFR 51.165 (a)(2)(ii)(B), but there is a reasonable possibility that the project may result in a significant emissions increase, the owner or operator shall comply with all of the provisions of 40 CFR 51.165 (a)(6) and (a)(7).
- Emissions increases calculated pursuant to this section are significant if they exceed the significance thresholds specified in the table below.

Federal Major Modification Thresholds for Emission Increases	
Pollutant	Threshold (lb/year)
VOC	0

The Net Emissions Increases (NEI) for purposes of determination of a "Less-Than-Significant Emissions Increase" exclusion will be calculated below to determine if this project qualifies for such an exclusion.

Since this project consists of both existing and new emissions units, the "hybrid test" specified in 40 CFR 51.165 (a)(2)(ii)(F) is applicable and requires that the NEI determination be based on the sum of the individual NEI determinations for existing emissions units (NEI_E) and new emissions units (NEI_N) pursuant to 40 CFR 51.165 (a)(2)(ii)(C) and (D) respectively. Therefore,

$NEI = NEI_E + NEI_N$

Net Emission Increase for New Units (NEI_N)

For new emissions units, the increase in emissions is equal to the PE2 for each new unit included in this project.

$NEI_N = \sum PE2_N$

NEI_N = 34,466 lb-VOC/year + 10,400 lb-VOC/year
NEI_N = 44,866 lb-VOC/year

Net Emission Increase for Existing Units (NEI_E)

For existing emissions units, the increase in emissions is calculated as follows:

Emission Increase = PAE – BAE - UBC

Where: PAE = Projected Actual Emissions = PE2 = PE1, and
BAE = Baseline Actual Emissions
UBC = Unused baseline capacity

UBC: Since this project does not result in an increase in design capacity or potential to emit, it does not impact the ability of the existing emission units to operate at a higher utilization rate, and a coating operation served by a paint booth does not reduce capacity or efficiency over time, the UBC is the portion of PAE that the emission units could have accommodated during the baseline period. Therefore, the UBC = PAE – BAE.

Emission Increase = PAE – BAE – UBC
= PAE – BAE – (PAE – BAE)
= 0 lb/year

Net Emission Increase for All Units (NEI)

NEI = NEI_E + NEI_N
= 0 + 44,866 lb-VOC/year
= 44,866 lb-VOC/year

The NEI for this project will be greater than the Federal Major Modification threshold of 0 lb-VOC/year. Therefore, this project does not qualify for a "Less-Than-Significant Emissions Increase" exclusion and is thus determined to be a Federal Major Modification for VOC.

Federal Offset Quantities:

The Federal offset quantity is calculated only for the pollutants for which the project is a Federal Major Modification. The Federal offset quantity is the sum of the annual emission changes for all new and modified emission units in a project calculated as the potential to emit after the modification (PE2) minus the actual emissions (AE) during the baseline period for each emission unit times the applicable federal offset ratio. There are no special considerations for units covered by an SLC.

Since all the permit units at this facility are limited to a combined limit of 54,385 lb-VOC/year (149.0 lb-VOC/day x 365 days/year) by a federally enforceable condition listed on each permit, the combined potential emissions = 54,385 lb-VOC/year for all units. The actual emissions from each permit unit are calculated as the average emissions from the 2015 and 2016 calendar year, as taken from the facility's emissions inventory (see Appendix I). The actual emissions and potential emissions are summarized in the following table:

Permit No.	Actual Emissions (lb/year)	Potential Emissions (lb/year)
C-1080-1-4	(7,298 + 4,640) ÷ 2 = 5,969	54,385
C-1080-2-5	(0 + 0) ÷ 2 = 0	
C-1080-4-2	(10,953 + 13,760) ÷ 2 = 12,357	
C-1080-7-2	(9,818 + 8,980) ÷ 2 = 9,399	
C-1080-9-2	(1,754 + 60) ÷ 2 = 907	
C-1080-10-2	(0 + 0) ÷ 2 = 0	
C-1080-11-0	0	
C-1080-12-0	0	
Total	**28,632**	**54,385**

The Net Emission Change NEC) = (54,385 – 28,632) lb-VOC/year = 25,753 lb-VOC/year.

The federal offset ratio for VOC is 1.5 and the Federal Offset Quantity is calculated as the NEC x 1.5 = 25,753 lb-VOC/year x 1.5 = **38,630 lb-VOC/year**.

9. Rule 2410 - Prevention of Significant Deterioration (PSD) Applicability Determination

Rule 2410 applies to any pollutant regulated under the Clean Air Act, except those for which the District has been classified nonattainment. The pollutants which must be addressed in the PSD applicability determination for sources located in the SJV and which are emitted in this project are: (See 52.21 (b)(23) definition of significant)

- NO_2 (as a primary pollutant)
- SO_2 (as a primary pollutant)
- CO
- PM
- PM_{10}

I. Project Emissions Increase - New Major Source Determination

The post-project potentials to emit from all new and modified units are compared to the PSD major source thresholds to determine if the project constitutes a new major source subject to PSD requirements.

The facility or the equipment evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21 (b)(1)(i). The PSD Major Source threshold is 250 tpy for any regulated NSR pollutant.

PSD Major Source Determination: Potential to Emit (tons/year)						
	NO_2	VOC	SO_2	CO	PM	PM_{10}
Total PE from New and Modified Units	1.3	27.2	0.0	1.1	14.6	14.6
PSD Major Source threshold	250	250	250	250	250	250
New PSD Major Source?	N	N	N	N	N	N

As shown in the table above, the potential to emit for the project, by itself, does not exceed any PSD major source threshold. Therefore Rule 2410 is not applicable and no further analysis is required.

10. Quarterly Net Emissions Change (QNEC)

The QNEC is calculated solely to establish emissions that are used to complete the District's PAS emissions profile screen. Detailed QNEC calculations are included in Appendix B.

VIII. Compliance

Rule 2020 Exemptions

Pursuant to Section 6.19 of this Rule, a permit is not required for a low emitting unit. Section 3.10 of this Rule defines a low emitting unit as an emissions unit with an uncontrolled emissions rate of each air contaminant, less than or equal to two pounds per day, or if greater than two pounds per day, is less than or equal to 75 pounds per year. The PE for the booth heaters is calculated below:

Emission Factors:

Burner Emission Factors for Units -1, -2, -4, -7 and -12		
Operation	Emission Rate	Source
Natural gas combustion in each heater	0.10 lb-NO_x/MMBtu	AP-42, Table 1.4-1 (7/98)
	0.00285 lb-SO_x/MMBtu	APR-1720 (12/01)
	0.0076 lb-PM_{10}/MMBtu	AP-42, Table 1.4-2 (7/98)
	0.084 lb-CO/MMBtu	AP-42, Table 1.4-1 (7/98)
	0.0055 lb-VOC/MMBtu	AP-42, Table 1.4-2 (7/98)

Potential to Emit:

Daily PE2 from the booth heaters is calculated using the following equation and summarized in the table below.

$PE2_{Booth\ Heater}$ (lb/day) = EF (lb/MMBtu) x Maximum Heat Input (MMBtu/day)

Daily PE2 Natural Gas-Fired Booth Heater for Units -1, -2, -4 -7, and -12			
Pollutant	EF (lb/MMBtu)	Maximum Heat Input (MMBtu/day)	PE2 (lb/day)
NO_x	0.1	20	2.0
SO_x	0.00285	20	0.1
PM_{10}	0.0076	20	0.2
CO	0.084	20	1.7
VOC	0.0055	20	0.1

As shown above, emissions from the booth heaters in units -1, -2, -4 and -12 in the motor vehicle coating operations do not exceed two pounds per day for any air contaminant. Therefore, the booth heaters are exempt from permitting and NSR requirements.

Rule 2201 New and Modified Stationary Source Review Rule

A. Best Available Control Technology (BACT)

1. BACT Applicability

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis. Unless specifically exempted by Rule 2201, BACT shall be required for the following actions*:

a. Any new emissions unit with a potential to emit exceeding two pounds per day,
b. The relocation from one Stationary Source to another of an existing emissions unit with a potential to emit exceeding two pounds per day,
c. Modifications to an existing emissions unit with a valid Permit to Operate resulting in an AIPE exceeding two pounds per day, and/or
d. Any new or modified emissions unit, in a stationary source project, which results in an SB 288 Major Modification or a Federal Major Modification, as defined by the rule.

*Except for CO emissions from a new or modified emissions unit at a Stationary Source with an SSPE2 of less than 200,000 pounds per year of CO.

a. New emissions units – PE > 2 lb/day

C-1080-11:
As shown in the table below the new coating operation has two emissions units: the coating operation conducted in the booth and the booth heater. BACT is triggered for NOx from the booth heater and PM_{10} and VOC from coating since the PE is greater than 2 lb/day. However, BACT is not triggered for CO since the SSPE2 for CO is not greater than 200,000 lb/year, as demonstrated in Section VII.C.5 above.

Daily PE2 for C-1080-11		
Pollutant	$PE2_{Booth\ Heater}$ (lb/day)	$PE2_{Priming/Coating}$ (lb/day)
NO_x	7.2	0.0
SO_x	0.2	0.0
PM_{10}	0.5	4.9
CO	6.0	0.0
VOC	0.4	148.6

C-1080-12:
BACT is only triggered for PM_{10} and VOC from the coating since the PE is greater than 2 lb/day.

Daily PE2 for C-1080-12	
Pollutant	$PE2_{Priming/Coating}$ (lb/day)
NO_x	0.0
SO_x	0.0
PM_{10}	3.2
CO	0.0
VOC	40.0

b. Relocation of emissions units – PE > 2 lb/day

As discussed in Section I above, there are no emissions units being relocated from one stationary source to another. Therefore, BACT for relocation of emissions units purposes is not triggered.

c. Modification of emissions units – AIPE > 2 lb/day

C-1080-1, -2, -4, -7, -9:
AIPE = PE2 – HAPE

Where,
AIPE = Adjusted Increase in Permitted Emissions, (lb/day)
PE2 = Post-Project Potential to Emit, (lb/day)
HAPE = Historically Adjusted Potential to Emit, (lb/day)

HAPE = PE1 x (EF2/EF1)

Where,
PE1 = The emissions unit's PE prior to modification or relocation, (lb/day)
EF2 = The emissions unit's permitted emission factor for the pollutant after modification or relocation. If EF2 is greater than EF1 then EF2/EF1 shall be set to 1
EF1 = The emissions unit's permitted emission factor for the pollutant before the modification or relocation

AIPE = PE2 – (PE1 * (EF2 / EF1))

Since the PE2 = PE1 and the EF2 = EF1 for all existing units, the AIPE = 0 lb/day; therefore, BACT is not triggered for the modified units.

d. SB 288/Federal Major Modification

As discussed in Sections VII.C.7 and VII.C.8 above, this project constitutes a Federal Major Modification for VOC emissions. Therefore, BACT is triggered for VOC for units -11 and -12 since there is a VOC emissions increase.

2. BACT Guideline

BACT Guideline 4.2.1, applies to the automotive spray painting operations in this project. [Automotive Spray Painting Operations, < 5.0 MMBtu/hr] (See Appendix C)

3. Top Down BACT Analysis

Per Permit Services Policies and Procedures for BACT, a top-down BACT analysis shall be performed as a part of the application review for each application subject to the BACT requirements pursuant to the District's NSR Rule.

Pursuant to the attached top-down BACT analysis, which appears in Appendix D of this report, BACT is satisfied with:

VOC: District Rule 4612 compliant spray guns and VOC coatings and solvents in compliance with Rule 4612
NOx: Natural gas or LPG-fired burner
PM_{10}: Spray booth with exhaust filters achieving 95% control efficiency

The applicant has proposed the use of District Rule 4612 compliant spray guns, VOC coatings and solvents in compliance with Rule 4612, a natural gas-fired burner and a spray booth with exhaust filters achieving 95% control efficiency. Therefore, all BACT requirements are satisfied for units -11 and -12.

The following conditions will be included on the ATC as a mechanism to ensure compliance:

C-1080-11 & -12:

- All coating, including application of primer, shall be conducted in the booth with filters in place, fan(s) operating, and doors closed. [District Rule 2201]
- The VOC Regulatory content of coatings, as applied, shall not exceed any of the following limits: adhesion promoter 540 g/l (4.5 lb/gal), clear coating 250 g/l (2.1 lb/gal), color coating 420 g/l (3.5 lb/gal), multi-color coating 680 g/l (5.7 lb/gal), pretreatment coating 660 g/l (5.5 lb/gal), primer 250 g/l (2.1 lb/gal), primer sealer 250 g/l (2.1 lb/gal), single-stage coating 340 g/l (2.8 lb/gal), temporary protective coating 60 g/l (0.5 lb/gal), truck bed liner coating 310 g/l (2.6 lb/gal), underbody coating 430 g/l (3.6 lb/gal), uniform finish coating 540 g/l (4.5 lb/gal), and any other coating type 250 g/l (2.1 lb/gal). The VOC Regulatory content for coatings shall be defined as the VOC in grams per liter of coating (or pounds per gallon of coating), excluding water and exempt compounds. [District Rules 2201 and 4612]

C-1080-11:

- Only high-volume low-pressure (HVLP) spray equipment, electrostatic, brush, dip, or roll coating application equipment, or other application equipment approved by the District in writing, shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4612]

C-1080-12:

- For all coatings applications, except truck bed liner coating application, only high-volume low-pressure (HVLP) spray equipment, electrostatic, brush, dip, or roll coating application equipment, or other application equipment approved by the District in writing, shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4612]

B. Offsets

1. Offset Applicability

Offset requirements shall be triggered on a pollutant by pollutant basis and shall be required if the SSPE2 equals to or exceeds the offset threshold levels in Table 4-1 of Rule 2201.

The SSPE2 is compared to the offset thresholds in the following table.

Offset Determination (lb/year)					
	NO_X	SO_X	PM_{10}	CO	VOC
SSPE2	2,628	73	29,199	2,190	54,385
Offset Thresholds	20,000	54,750	29,200	200,000	20,000
Offsets triggered?	No	No	No	No	Yes

2. Quantity of Offsets Required

As seen above, the SSPE2 is greater than the offset threshold for VOC; therefore, offset calculations will be required for this project.

The quantity of offsets in pounds per year for VOC is calculated as follows for sources with an SSPE1 greater than the offset threshold levels before implementing the project being evaluated.

Offsets Required (lb/year) = (Σ[PE2 – BE] + ICCE) x DOR, for all new or modified emissions units in the project,

Where,
PE2 = Post Project Potential to Emit, (lb/year)
BE = Baseline Emissions, (lb/year)
ICCE = Increase in Cargo Carrier Emissions, (lb/year)
DOR = Distance Offset Ratio

BE = Pre-project Potential to Emit for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, Located at a Major Source.

otherwise,

BE = Historic Actual Emissions (HAE)

Pursuant to District Policy APR 1420, *NSR Calculations for Units with Specific Limiting Conditions (3/12/07)*, the quantity of ERCs for a project will be determined by comparing the post project PE, which is the SLC, to the pre project BE for the SLC.

Additionally, the policy states that if the SLC is for a pollutant exceeding the Major Source threshold and any single unit under the SLC is not a Highly-Utilized, Fully-Offset, or Clean Emissions Units, then the sum of the actual emissions from all units in SLC will be used to determine the BE.

As established above, all units in this project meet the District's determination of achieved-in-practice BACT (and are thus Clean Emission Units), therefore the BE are equal to the pre project PE ($BE_{SLC} = PE1_{SLC}$).

Based on the information above, the emissions increase to be offset for this project is calculated as follows:

Emissions Increase (lb/year) = $PE2_{SLC} - BE_{SLC}$
Where: $PE2_{SLC}$ = The post project SLC selected by the facility. In this project, $PE2_{SLC} = PE1_{SLC}$.

BE_{SLC} = 54,385 lb-VOC/year

Therefore,

Emissions Increase (lb/year) = $PE2_{SLC} - BE_{SLC}$
= 54,385 lb-VOC/year - 54,385 lb-VOC/year
= 0 lb-VOC/year

As demonstrated in the calculation above, the amount of offsets is zero. Therefore, offsets will not be required for this project.

C. Public Notification

1. Applicability

Public noticing is required for:
a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications,
b. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,
c. Any project which results in the offset thresholds being surpassed,
d. Any project with an SSIPE of greater than 20,000 lb/year for any pollutant, and/or
e. Any project which results in a Title V significant permit modification

a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications

New Major Sources are new facilities, which are also Major Sources. Since this is not a new facility, public noticing is not required for this project for New Major Source purposes.

As demonstrated in Section VII.C.8, this project is a Federal Major Modification. Therefore, public noticing for Federal Major Modification purposes is required.

b. PE > 100 lb/day

The PE2 for these new units are compared to the daily PE Public Notice threshold in the following table:

PE > 100 lb/day Public Notice Thresholds				
Pollutant	**PE2 for Unit -11 (lb/day)**	**PE2 for Unit -12 (lb/day)**	**Public Notice Threshold**	**Public Notice Triggered?**
NO_X	7.2	0.0	100 lb/day	No
SO_X	0.2	0.0	100 lb/day	No
PM_{10}	5.4	3.2	100 lb/day	No
CO	6.0	0.0	100 lb/day	No
VOC	149.0	40.0	100 lb/day	Yes

Therefore, public noticing for PE > 100 lb/day purposes is required.

c. Offset Threshold

The SSPE1 and SSPE2 are compared to the offset thresholds in the following table.

Offset Thresholds (lb/year)				
Pollutant	SSPE1 (lb/year)	SSPE2 (lb/year)	Offset Threshold	Public Notice Required?
NO_X	949	2,628	20,000 lb/year	No
SO_X	37	73	54,750 lb/year	No
PM_{10}	68,553	29,199	29,200 lb/year	No
CO	803	2,190	200,000 lb/year	No
VOC	54,385	54,385	20,000 lb/year	No

As detailed above, there are no thresholds surpassed with this project; therefore, public noticing is not required for offset purposes.

d. SSIPE > 20,000 lb/year

Public notification is required for any permitting action that results in a SSIPE of more than 20,000 lb/year of any affected pollutant. According to District policy, the SSIPE = SSPE2 – SSPE1. The SSIPE is compared to the SSIPE Public Notice thresholds in the following table.

SSIPE Public Notice Thresholds (lb/year)					
Pollutant	SSPE2 (lb/year)	SSPE1 (lb/year)	SSIPE (lb/year)	SSIPE Public Notice Threshold	Public Notice Required?
NO_x	2,628	949	1,679	20,000 lb/year	No
SO_x	73	37	36	20,000 lb/year	No
PM_{10}	29,199	68,553	-39,354	20,000 lb/year	No
CO	2,190	803	1,387	20,000 lb/year	No
VOC	54,385	54,385	0	20,000 lb/year	No

As demonstrated above, the SSIPEs for all pollutants are less than 20,000 lb/year; therefore, public noticing for SSIPE purposes is not required.

e. Title V Significant Permit Modification

As shown in the discussion of Rule 2520 below, this project constitutes a Title V significant modification. Therefore, public noticing for Title V significant modifications is required for this project.

2. Public Notice Action

As discussed above, public noticing is required for this project for being a Federal Major Modification, installing a new unit with emissions greater than 100 lb/day and for being Title V Significant Modification. Therefore, public notice documents will be submitted to the California Air Resources Board (CARB) and EPA and a public notice will be published in a local newspaper of general circulation prior to the issuance of the ATCs for this project.

D. Daily Emission Limits (DELs)

DELs and other enforceable conditions are required by Rule 2201 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. The DEL must be contained in the latest ATC and contained in or enforced by the latest PTO and enforceable, in a practicable manner, on a daily basis. DELs are also required to enforce the applicability of BACT.

The following conditions will be included on the ATCs as a mechanism to enforce compliance:

All ATCs:

- Facility-wide VOC emissions shall not exceed 149.0 pounds in any one day. [District Rule 2201]

C-1080-1:

- All coating, including application of primer, shall be conducted in the booth with filters in place, fan(s) operating, and doors closed. [District Rule 2201]
- The PM10 emission rate from the coating operation shall not exceed 50.0 lb/day. [District Rule 2201]

C-1080-2:

- All coating, including application of primer, shall be conducted in the booth with filters in place, fan(s) operating, and doors closed. [District Rule 2201]
- The VOC emission rate from the truck bed liner coating operation shall not exceed 0.7 lb/day. [District Rule 2201]
- The total VOC emission rate from this unit shall not exceed 50.0 lb/day. [District Rule 2201]
- The PM10 emission rate from the truck bed liner coating operation shall not exceed 3.0 lb/day. [District Rule 2201]
- The total PM10 emission rate from this unit shall not exceed 14.5 lb/day. [District Rule 2201]

C-1080-4:

- All coating, including application of primer, shall be conducted in the booth with filters in place, fan(s) operating, and doors closed. [District Rule 2201]
- The PM10 emission rate from the coating operation shall not exceed 50.0 lb/day. [District Rule 2201]

C-1080-7:

- All coating, including application of primer, shall be conducted in the booth with filters in place, fan(s) operating, and doors closed. [District Rule 2201]
- The VOC emission rate from this unit shall not exceed 99.0 lb/day. [District Rule 2201]
- The PM10 emission rate from this unit shall not exceed 23.3 lb/day. [District Rule 2201]

C-1080-9:

- The PM10 emission rate from the coating operation shall not exceed 50.0 lb/day. [District Rule 2201]

C-1080-10:

- The dust collector shall achieve a minimum PM10 control efficiency of 99.97%. [District Rules 2201 and 4102]
- The maximum PM10 emission rate from the laser cutting operation is 0.013 lb per day based on 24 hours of operation. [District Rules 2201 and 4102]
- The laser cutting operation shall only cut mild steel and galvanized steel. [District Rule 2201]

C-1080-11:

- All coating, including application of primer, shall be conducted in the booth with filters in place, fan(s) operating, and doors closed. [District Rule 2201]
- The PM10 emission rate from this unit shall not exceed 5.4 lb/day. [District Rule 2201]
- Emissions from the burner shall not exceed any of the following limits: 0.10 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.084 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201]
- {4930} The booth heater shall only be fired on PUC quality natural gas. [District Rule 2201]

C-1080-12:

- All coating, including application of primer, shall be conducted in the booth with filters in place, fan(s) operating, and doors closed. [District Rule 2201]
- The VOC emission rate from this unit shall not exceed either of the following limits: 40.0 lb/day or 10,400 lb/year. [District Rule 2201]
- The PM10 emission rate from the coating operation shall not exceed 3.2 lb/day. [District Rule 2201]

Additionally, to limit annual PM_{10} emissions, the following condition will be included on all ATCs:

- Facility-wide PM10 emissions shall not exceed 29,199 pounds in any rolling 12-month period. [District Rule 2201]

E. Compliance Assurance

1. Source Testing

Pursuant to District Policy APR 1705, source testing is not required to demonstrate compliance with Rule 2201.

2. Monitoring

C-1080-1, -2, -4, -7, -9:
No monitoring is required to demonstrate compliance with Rule 2201.

C-1080-10:
To ensure the dust collector is operated properly the following conditions will be placed on the permit to ensure compliance.

- The dust collector shall be maintained and operated according to manufacturer's specifications. [District Rule 2201]
- The dust collector cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201]
- Material removed from the dust collector shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
- Visible emissions from the exhaust of the dust collector serving the laser cutter 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 dust collector shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201]
- A spare set of filters shall be maintained on the premises at all times. [District Rule 2201]
- The dust collector shall operate at all times with a minimum differential pressure of 0 inch of water column and a maximum differential pressure of 6.5 inches water column. [District Rule 2201]

3. Recordkeeping

Recordkeeping is required to demonstrate compliance with the offset, public notification and daily emission limit requirements of Rule 2201. The following conditions will be included on the ATC as a mechanism to enforce compliance:

All ATCs:
- On a monthly basis, the permittee shall calculate and record the monthly PM10 emissions from this unit. [District Rule 1070]

- On a monthly basis, the permittee shall calculate and record the facility-wide PM10 emissions in pounds for the rolling 12-month period. The facility-wide PM10 emissions shall be calculated by summing the PM10 emissions from the previous 12 months from every permitted unit at this facility. [District Rule 1070]

C-1080-1, -2, -4, -7, -9, -11, -12:

- Permittee shall maintain daily records of quantity (gallons) and solids content of coatings applied. Permittee shall also maintain daily records of VOC content as applied (lb/gal) of each coating used, quantity (gallons) of each coating used, and calculated daily VOC emissions. [District Rule 1070]
- {4896} The permittee shall maintain records on a daily basis and have available at all times the following: a current list of all coatings used that includes the material name and manufacturer, application method, coating type and mix ratio specific to the coating, the VOC Actual for Coatings and VOC Regulatory for Coatings as applied, and the quantity of each type of coating used; current manufacturer specification sheets, material safety data sheets (MSDS), technical data sheets, or air quality data sheets, which list the VOC Actual for Coatings and VOC Regulatory for Coatings of each ready-to-spray coating and automotive coating components; and purchase records identifying the coating type, name, and volume of coatings bought. [District Rules 2201 and 4612]
- {4243} The permittee shall keep the following records for each solvent used for cleaning activities: the quantity of solvent used; a copy of the manufacturer's product data or material safety data sheet (MSDS); the solvent's name and manufacturer, the VOC content of the solvent in grams/liter or pounds/gallon, and the mix ratio and VOC content of the batch when the solvent is a mixture of different materials blended by the permittee. [District Rules 2201 and 4612]
- On a monthly basis, the permittee shall calculate and record the PM10 emissions in pounds from this unit for the prior calendar month. [District Rule 1070]
- On a monthly basis, the permittee shall calculate and record the facility-wide PM10 emissions in pounds for the prior 12 calendar month period. The facility-wide PM10 emissions shall be calculated by summing the PM10 emissions from the previous 12 calendar months from every permitted unit at this facility. [District Rule 1070]
- {4926} Daily VOC emissions of each coating and/or solvent shall be calculated as follows: daily VOC emissions = VOC content (lb/gallon) as applied x usage (gallon/day). Total daily VOC emissions is the sum of VOC emissions from all coatings and/or solvents used. [District Rule 2201]
- {4244} Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 2201 and 4612]

C-1080-1, -2, -4, -7, -11:

- Daily PM10 emissions of each coating shall be calculated as follows: daily PM10 emissions = coating density (lb/gallon) x coating solids content (%) x usage (gallons/day) x 0.0125[4]. Total daily PM10 emissions is the sum of PM10 emissions from all coatings used. [District Rule 2201]

[4] 0.0125 = (1 - control efficiency of booth filters) x (1 - transfer efficiency of spray gun) = (1 - 0.95) x (1 - 0.75)

C-1080-9:

- Daily PM10 emissions of each coating applied outside the booth shall be calculated as follows: daily PM10 emissions = coating density (lb/gallon) x coating solids content (%) x usage (gallons/day) x 0.25[5]. Total daily outside the booth PM10 emissions is the sum of PM10 emissions from all coatings applied outside the booth. [District Rule 2201]
- Daily PM10 emissions of each coating applied inside the booth shall be calculated as follows: daily PM10 emissions = coating density (lb/gallon) x coating solids content (%) x usage (gallons/day) x 0.0125. Total daily inside the booth PM10 emissions is the sum of PM10 emissions from all coatings applied inside the booth. [District Rule 2201]
- Total daily PM10 emissions is the sum of PM10 emissions from all coatings applied outside the booth and all coatings applied inside the booth. [District Rule 2201]

C-1080-10:

Since the laser cutter is permitted to operate at its maximum capacity, no condition will be included requiring the operator to calculate and record on a daily basis the amount of material removed as established in project C-1152799.

- Differential operating pressure shall be monitored and recorded on each day that the dust collector operates. [District Rule 2201]
- The operator shall record the date and type of metal cut whenever the laser is used. [District Rule 1070]
- Records of all maintenance of the dust collector, including all change outs of filter media, shall be maintained. [District Rule 2201]
- The permittee shall maintain records of the dust collector manufacturer's guaranteed control efficiency for PM10. [District Rules 1070 and 2201]
- Records required by this permit shall be retained on-site for at least five years and shall be made readily available for District inspection on request. [District Rules 1070 and 2201]

C-1080-11:

- Daily PM10 emissions from the booth heater shall be calculated as follows: daily PM10 emissions = hours of operation (hrs/day) x 0.0228. Total daily PM10 emissions is the sum of PM10 emissions from the booth heater and all coatings used. [District Rule 1070]
- Daily VOC emissions from the booth heater shall be calculated as follows: daily VOC emissions = hours of operation (hrs/day) x 0.0165. Total daily VOC emissions is the sum of VOC emissions from all coatings and/or solvents used and from the booth heater. [District Rule 2201]
- Daily PM10 emissions of each coating shall be calculated as follows: daily PM10 emissions = coating density (lb/gallon) x coating solids content (%) x usage (gallons/day) x 0.0125. Total daily PM10 emissions is the sum of PM10 emissions from the booth heater and all coatings used. [District Rule 1070]

[5] 0.25 = (1 – transfer efficiency of spray gun) = (1 – 0.75)

C-1080-12:

- Daily PM10 emissions of each coating shall be calculated as follows: daily PM10 emissions = coating density (lb/gallon) x coating solids content (%) x usage (gallons/day) x 0.0125. Total daily PM10 emissions is the sum of PM10 emissions from all coatings used. [District Rule 2201]
- Permittee shall maintain daily records of the quantity (gallons) of coatings used. [District Rule 1070]

4. Reporting

No reporting is required to demonstrate compliance with Rule 2201.

F. Ambient Air Quality Analysis (AAQA)

An AAQA shall be conducted for the purpose of determining whether a new or modified Stationary Source will cause or make worse a violation of an air quality standard. The District's Technical Services Division conducted the required analysis. Refer to Appendix E of this document for the AAQA summary sheet.

The proposed location is in an attainment area for NO_X, CO, and SO_X. As shown by the AAQA summary sheet the proposed equipment will not cause a violation of an air quality standard for NO_X, CO, or SO_X.

The proposed location is in a non-attainment area for the state's PM_{10} as well as federal and state $PM_{2.5}$ thresholds. As shown by the AAQA summary sheet the proposed equipment will not cause a violation of an air quality standard for PM_{10} and $PM_{2.5}$.

G. Compliance Certification

Section 4.15.2 of this Rule requires the owner of a new Major Source or a source undergoing a Federal Major Modification to demonstrate to the satisfaction of the District that all other Major Sources owned by such person and operating in California are in compliance or are on a schedule for compliance with all applicable emission limitations and standards. As discussed in Section VII.C.8 above, this project constitutes a Federal Major Modification, therefore this requirement is applicable. Scelzi Enterprises, Inc.'s compliance certification is included in Appendix G.

H. Alternate Siting Analysis

The current project occurs at an existing facility. The applicant proposes to install two spray coating booths inside of an existing building at a site with 6 other permit units.

Since the project will provide the installation of two booths inside of an existing building, the existing site will result in the least possible impact from the project. Alternative sites would involve the relocation and/or construction of various support structures on a much greater scale, and would therefore result in a much greater impact.

Rule 2410 Prevention of Significant Deterioration

As shown in Section VII.C.9 above, this project does not result in a new PSD major source or PSD major modification. No further discussion is required.

Rule 2520 Federally Mandated Operating Permits

This facility is subject to this Rule, and has received their Title V Operating Permit. A significant permit modification is defined as a "permit amendment that does not qualify as a minor permit modification or administrative amendment."

Section 3.20.5 states that a minor permit modification is a permit modification that is not a Title I modification. As discussed above, this project triggers a Federal Major Modification which is a Title I modification. As a result, the proposed project constitutes a Significant Modification to the Title V Permit pursuant to Section 3.29.

As discussed above, these ATCs will be issued with a Certificate of Conformity (COC). Therefore, the facility must apply to modify their Title V permit with an Administrative Amendment, prior to operating with the proposed modifications. Continued compliance with this rule is expected. The following conditions will be included on each ATC and will assure compliance with the requirements of Rule 2520:

- {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201]

- {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4]

Rule 4001 New Source Performance Standards

This rule incorporates NSPS from Part 60, Chapter 1, Title 40, Code of Federal Regulations (CFR); and applies to all new sources of air pollution and modifications of existing sources of air pollution listed in 40 CFR Part 60. However, no subparts of 40 CFR Part 60 apply to motor vehicle coating operations or metal cutting operations.

Rule 4002 National Emissions Standards for Hazardous Air

This rule incorporates NESHAPs from Part 61, Chapter I, Subchapter C, Title 40, CFR and the NESHAPs from Part 63, Chapter I, Subchapter C, Title 40, CFR; and applies to all sources of hazardous air pollution listed in 40 CFR Part 61 or 40 CFR Part 63.

No NESHAPs are applicable to metal cutting operations.

The requirements of 40 CFR Part 63, Subpart HHHHHH (National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources) are applicable to facilities the operate an area source of HAP as defined in paragraph (b) of this section, including sources that are part of a tribal, local, State, or Federal facility and you perform one or more of the activities in §63.11170, paragraphs (a)(1) through (3):

§ 63.11170(a)(1) Perform paint stripping using MeCl for the removal of dried paint (including, but not limited to, paint, enamel, varnish, shellac, and lacquer) from wood, metal, plastic, and other substrates.

(2) Perform spray application of coatings, as defined in §63.11180, to motor vehicles and mobile equipment including operations that are located in stationary structures at fixed locations, and mobile repair and refinishing operations that travel to the customer's location, except spray coating applications that meet the definition of facility maintenance in §63.11180. However, if you are the owner or operator of a motor vehicle or mobile equipment surface coating operation, you may petition the Administrator for an exemption from this subpart if you can demonstrate, to the satisfaction of the Administrator, that you spray apply no coatings that contain the target HAP, as defined in §63.11180. Petitions must include a description of the coatings that you spray apply and your certification that you do not spray apply any coatings containing the target HAP. If circumstances change such that you intend to spray apply coatings containing the target HAP, you must submit the initial notification required by §63.11175 and comply with the requirements of this subpart.

(3) Perform spray application of coatings that contain the target HAP, as defined in §63.11180, to a plastic and/or metal substrate on a part or product, except spray coating applications that meet the definition of facility maintenance or space vehicle in §63.11180.

(b) An area source of HAP is a source of HAP that is not a major source of HAP, is not located at a major source, and is not part of a major source of HAP emissions. A major source of HAP emissions is any stationary source or group of stationary sources located within a contiguous area and under common control that emits or has the potential to emit any single HAP at a rate of 9.07 megagrams (Mg) (10 tons) or more per year, or emit any combination of HAP at a rate of 22.68 Mg (25 tons) or more per year.

A Target HAP, per §63.11180, is a compound of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd).

The facility will not use coatings containing a target HAP and is therefore exempt from the provisions of the NESHAP. The following condition will be included on all ATCs, except unit -10, as a mechanism to enforce compliance:

- {4929} No coatings, solvents, or additives containing any of the following compounds shall be used: lead compounds, hexavalent chromium, cadmium, and/or nickel compounds. [District Rule 4102 and 40 CFR 63, Subpart HHHHHH]

Rule 4101 Visible Emissions

Rule 4101 states that 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. As long as the equipment is properly maintained and operated, compliance with the visible emissions limit is expected. The following conditions will be included on the ATCs as a mechanism to enforce compliance:

C-1080-1, -2, -4, -7, -9, -11, -12:

- {15} 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]

C-1080-10:

- Visible emissions from the exhaust of the dust collector serving the laser cutter 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]

Rule 4102 Nuisance

Rule 4102 prohibits discharge of air contaminants which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected as a result of this operation, provided the equipment is well maintained. Therefore, compliance with this rule is expected. The following condition will be included on all ATCs as a mechanism to enforce compliance:

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

California Health & Safety Code 41700 (Health Risk Assessment)

District Policy APR 1905 – *Risk Management Policy for Permitting New and Modified Sources* specifies that for an increase in emissions associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite.

An HRA is not required for a project with a total facility prioritization score of less than one. According to the Technical Services Memo for this project (Appendix E), the total facility prioritization score including this project was greater than one. Therefore, an HRA was required to determine the short-term acute and long-term chronic exposure from this project.

The cancer risk for this project is shown below:

HRA Summary		
Unit	**Cancer Risk**	**T-BACT Required**
C-1080-11-0	0.0000795 per million	No
C-1080-12-0		

Discussion of T-BACT

BACT for toxic emission control (T-BACT) is required if the cancer risk exceeds one in one million. As demonstrated above, T-BACT is not required for this project because the HRA indicates that the risk is not above the District's thresholds for triggering T-BACT requirements; therefore, compliance with the District's Risk Management Policy is expected.

District policy APR 1905 also specifies that the increase in emissions associated with a proposed new source or modification not have acute or chronic indices, or a cancer risk greater than the District's significance levels (i.e. acute and/or chronic indices greater than 1 and a cancer risk greater than 20 in a million). As outlined in the Technical Services Memo in Appendix E of this report, the emissions increases for this project were determined to be less than significant.

The following conditions will be included on ATCs -11-0 and -12-0:

- The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
- No coatings, solvents, or additives containing any of the following compounds shall be used: lead compounds, hexavalent chromium, cadmium, and/or nickel compounds. [District Rule 4102 and 40 CFR63, Subpart HHHHHH]

Rule 4201 Particulate Matter Concentration

Section 3.1 prohibits discharge of dust, fumes, or total particulate matter into the atmosphere from any single source operation in excess of 0.1 grain per dry standard cubic foot.

$$\text{PM Conc. (gr/scf)} = \frac{\text{(PM emission rate) x (7,000 gr/lb)}}{\text{(Air flow rate) x (60 min/hr) x (24 hr/day)}}$$

Assuming 100% of PM is PM_{10}:

C-1080-1:
Exhaust Gas Flow = 28,410 scfm per project C-1011758
PM Conc (gr/scf) = [(50.0 lb/day) x (7,000 gr/lb)] ÷ [(28,410 ft^3/min) x (60 min/hr) x (24 hr/day)]
PM Conc = 0.009 gr/scf

C-1080-2:
Exhaust Gas Flow = 28,410 scfm per HRA for project C-1101157
PM Conc (gr/scf) = [(3.0 lb/day) x (7,000 gr/lb)] ÷ [(28,410 ft^3/min) x (60 min/hr) x (24 hr/day)]
PM Conc = 0.0005 gr/scf

C-1080-4:
Exhaust Gas Flow = 13,040 scfm per project C-1101157
PM Conc (gr/scf) = [(50.0 lb/day) x (7,000 gr/lb)] ÷ [(13,040 ft^3/min) x (60 min/hr) x (24 hr/day)]
PM Conc = 0.02 gr/scf

C-1080-7:
Exhaust Gas Flow = 36,000 scfm per project C-1063643
PM Conc (gr/scf) = [(23.3 lb/day) x (7,000 gr/lb)] ÷ [(36,000 ft^3/min) x (60 min/hr) x (24 hr/day)]
PM Conc = 0.003 gr/scf

C-1080-9:
Exhaust Gas Flow = 13,040 scfm, assuming worst case (lowest air flow rate from unit -4)
PM Conc (gr/scf) = [(50.0 lb/day) x (7,000 gr/lb)] ÷ [(13,040 ft^3/min) x (60 min/hr) x (24 hr/day)]
PM Conc = 0.02 gr/scf

C-1080-10:
Exhaust Gas Flow = 1,020 scfm per project C-1152799
PM Conc (gr/scf) = [(0.013 lb/day) x (7,000 gr/lb)] ÷ [(1,020 ft^3/min) x (60 min/hr) x (24 hr/day)]
PM Conc = 0.00006 gr/scf

C-1080-11:
Exhaust Gas Flow = 24,460 scfm
PM Conc (gr/scf) = [(5.4 lb/day) x (7,000 gr/lb)] ÷ [(24,460 ft^3/min) x (60 min/hr) x (24 hr/day)]
PM Conc = 0.001 gr/scf

C-1080-12:
Exhaust Gas Flow = 24,000 scfm
PM Conc (gr/scf) = [(3.2 lb/day) x (7,000 gr/lb)] ÷ [(24,000 ft^3/min) x (60 min/hr) x (24 hr/day)]
PM Conc = 0.0006 gr/scf

The following conditions will be added to the ATCs as a mechanism to enforce compliance:

- {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]

Rule 4301 Fuel Burning Equipment

This rule specifies maximum emission rates in lb/hr for SO_2, NO_2, and combustion contaminants (defined as total PM in Rule 1020). This rule also limits combustion contaminants to ≤ 0.1 gr/scf. According to AP 42 (Table 1.4-2, footnote c), all PM emissions from natural gas combustion are less than 1 μm in diameter.

C-1080-11:
Dividing the previously calculated daily PE for the burners by the 24 hr/day operating schedule produces the hourly emission rates shown in the following table:

District Rule 4301 Limits			
Permit Unit	**NO_2**	**Total PM**	**SO_2**
C-1080-11	0.30	0.02	0.01
Rule Limit (lb/hr)	140	10	200

The above table indicates the calculated emissions will be below with the maximum lb/hr emission limits in this rule; therefore, compliance is expected.

Rule 4309 Dryers, Dehydrators, and Ovens

This rule applies to any dryer, dehydrator, or oven that is fired on gaseous fuel, liquid fuel, or is fired on gaseous and liquid fuel sequentially, and the total rated heat input for the unit is 5.0 million British thermal units per hour (5.0 MMBtu/hr) or greater.

The total rated heat input for the burner in unit -11 is less than 5.0 MMBtu/hr therefore the requirements of this rule are not applicable.

Rule 4612 Motor Vehicle and Mobile Equipment Coating Operations

The purpose of this rule is to limit volatile organic compound (VOC) emissions from coatings associated with the coatings of motor vehicles, mobile equipment, and associated parts and components. It also limits the VOC emissions from the organic solvent cleaning, storage, and disposal associated with such operations.

Section 5.1 requires that no person shall apply to any motor vehicle, mobile equipment, or associated parts and components, any coating with a VOC regulatory content, as calculated pursuant to Section 3.45.1, in excess of the applicable limits in Table 1, except as provided in Section 5.3. These limits are presented in the following table:

Table 1 - Rule 4612 Coating VOC Limits	
Coating Category	VOC Regulatory Limit, as applied, in grams/liter (lb per gallon)
	VOC Limits
Adhesion Promoter	540 (4.5)
Clear Coating	250 (2.1)
Color Coating	420 (3.5)
Multi-Color Coating	680 (5.7)
Pretreatment Coating	660 (5.5)
Primer	250 (2.1)
Primer Sealer	250 (2.1)
Single-Stage Coating	340 (2.8)
Temporary Protective Coating	60 (0.5)
Truck Bed Liner Coating	310 (2.6)
Underbody Coating	430 (3.6)
Uniform Finish Coating	540 (4.5)
Any other coating type	250 (2.1)

The applicant has proposed that the coatings used at the facility meet the requirements of this rule. The following conditions will be included on all the proposed ATCs, except -10, as a mechanism to enforce compliance:

- {4895} The VOC Regulatory content of coatings, as applied, shall not exceed any of the following limits: adhesion promoter 540 g/l (4.5 lb/gal), clear coating 250 g/l (2.1 lb/gal), color coating 420 g/l (3.5 lb/gal), multi-color coating 680 g/l (5.7 lb/gal), pretreatment coating 660 g/l (5.5 lb/gal), primer 250 g/l (2.1 lb/gal), primer sealer 250 g/l (2.1 lb/gal), single-stage coating 340 g/l (2.8 lb/gal), temporary protective coating 60 g/l (0.5 lb/gal), truck bed liner coating 310 g/l (2.6 lb/gal), underbody coating 430 g/l (3.6 lb/gal), uniform finish coating 540 g/l (4.5 lb/gal), and any other coating type 250 g/l (2.1 lb/gal). The VOC Regulatory content for coatings shall be defined as the VOC in grams per liter of coating (or pounds per gallon of coating), excluding water and exempt compounds. [District Rules 2201 and 4612]

Section 5.7 requires that except for underbody coatings, graphic arts operations, truck bed liner coatings, or any coating use of less than one (1.0) fluid ounce (29.6 milliliters), no person shall apply any coating to any motor vehicle, mobile equipment, or associated parts and components unless one of the following application methods is used:

5.7.1 Brush, dip, or roller.

5.7.2 Electrostatic spray.

5.7.3 High-Volume Low-Pressure (HVLP) spray equipment.

5.7.3.1 HVLP spray equipment shall be operated in accordance with the manufacturer's recommendations.

5.7.3.2 A person shall not sell or offer for sale for use within the SJVAB any HVLP spray gun without a permanent marking denoting the maximum inlet air pressure in psig at which the gun will operate within the parameters specified in Section 3.0.

5.7.4 Use of a spray gun not permanently marked HVLP. If a spray gun is used, the operator must demonstrate that the gun meets the HVLP definition in Section 3.21 in design and use. A satisfactory demonstration must be based on the manufacturer's published technical material on the design of the gun and by a demonstration of the operation of the gun using an air pressure tip gauge designed specifically for the gun in use.

5.7.5 Any other coating application method that is capable of achieving at least 65 percent transfer efficiency, as determined per Section 6.8.8. Written approval from the APCO shall be obtained for each alternative method prior to use.

The facility proposes using an HVLP gun. This application method complies with Section 5.7 of Rule 4612. The following conditions will be included on all the proposed ATCs, except -10, as a mechanism to enforce compliance:

- {4237} Only high-volume low-pressure (HVLP) spray equipment, electrostatic, bush, dip, or roll coating application equipment, or other application equipment approved by the District in writing, shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4612]

The following conditions will be used in lieu of the condition above for the truck bed coating operations (C-1080-2 and -12).

- For all coating application, except truck bed liner coating application, only high-volume low-pressure (HVLP) spray equipment, electrostatic, brush, dip, or roll coating application equipment, or other application equipment approved by the District in writing, shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4612]

- {4238} If an HVLP spray gun is used, the operator must demonstrate that the spray gun operates between 0.1 and 10 pounds per square inch, gauge, (psig) air atomizing pressure, measured dynamically at the center of the air cap and at the air horns. For a gun permanently labeled HVLP by the manufacturer, a satisfactory demonstration shall either be in the form of manufacturer's published technical information or by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer of the gun. For a gun not permanently labeled HVLP by the manufacturer, a satisfactory demonstration shall be based on manufacturer's published technical material and by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer of the gun. [District Rule 4612]

The Section 5.8 organic solvent cleaning requirements are as follows:

5.8.1 For solvent cleaning operations other than for bug and tar removal, a person shall not use solvents that have VOC content greater than 25 grams VOC per liter of cleaning material, as calculated using the equation listed in Section 3.45.3.

5.8.2 For bug and tar removal, a person shall not use any material other than bug and tar remover regulated under the Consumer Products Regulation (California Code of Regulations Section 94507 et seq.).

5.8.3 In lieu of complying with Sections 5.8.1 and 5.8.2, a person may control VOC emissions from solvent cleaning with an APCO-approved VOC emission control system for the solvent cleaning operation that meets the requirements of Section 5.3.

Section 5.9 requires that a person shall store or dispose of fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty.

The following conditions will be included on all the proposed ATCs, except -10, as a mechanism to enforce compliance with the requirements of Sections 5.8 and 5.9:

- {4239} For solvent cleaning operations other than for bug and tar removal, the permittee shall not use solvents that have VOC content greater than 25 g/l (0.21 lb/gal) of cleaning material. [District Rule 4612]

- {4240} For bug and tar removal, the permittee shall not use any material other than bug and tar remover regulated under the Consumer Products Regulation (California Code of Regulations Section 94507 et seq.). [District Rule 4612]

- {4241} All fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners shall be stored in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4612]

Section 6.0 administrative requirements are as follows:

6.1 Compliance Statement Requirement

6.1.1 For each individual automotive coating or automotive coating component, the manufacturer and repackager shall include the following information on product data sheets, or an equivalent medium:

6.1.1.1 The VOC Actual for Coatings and VOC Regulatory for Coatings, expressed in grams per liter, calculated pursuant to Section 3.45;

6.1.1.2 The weight percentage of volatiles, water, and exempt compounds;

6.1.1.3 The volume percentage of water and exempt compounds; and

6.1.1.4 The density of the material (in grams per liter).

6.1.2 For each individual ready to spray mixture (based on the manufacturer's and repackager's stated mix ratio), the manufacturer and repackager shall include the following information on product data sheets, or an equivalent medium:

6.1.2.1 The VOC Actual for Coatings and VOC Regulatory for Coatings, expressed in grams per liter, calculated pursuant to Section 3.45;

6.1.2.2 The weight percentage of volatiles, water, and exempt compounds;

6.1.2.3 The volume percentage of water and exempt compounds; and

6.1.2.4 The density of the material (in grams per liter).

Section 6.2 requires the manufacturer and repackager of automotive coatings or automotive coating components shall include on all containers the applicable use category(ies), and the VOC Actual for Coatings and VOC Regulatory for Coatings, as supplied, expressed in grams per liter.

Section 6.3 requires records required by this rule shall be retained on site for a period of five years, the records shall be made available on site to the APCO, ARB, or EPA, and the records shall be submitted to the APCO, ARB, or EPA upon request.

Section 6.4 states any person who uses coatings subject to this rule shall maintain records on a daily basis, and have available at all times, on site, the following:

6.4.1 A current list of all coatings used that are subject to this rule. This list shall include the following information for each coating:

6.4.1.1 Material name and manufacturer;

6.4.1.2 Application method;

6.4.1.3 Coating type (as listed in Section 5.1) and mix ratio specific to the coating;

6.4.1.4 VOC Actual for Coatings and VOC Regulatory for Coatings, as applied, calculated pursuant to Section 3.45; and

6.4.1.5 Quantity of each type of coating used.

6.4.2 Current manufacturer specification sheets, material safety data sheets, technical data sheets, or air quality data sheets, which list the VOC Actual for Coatings and VOC Regulatory for Coatings of each ready-to-spray coating (based on the manufacturer's state mix ratio) and automotive coating components.

6.4.3 Purchase records identifying the coating type (as listed in Section 5.1), name, and volume of coatings.

Section 6.5 requires an operator using solvents for cleaning shall keep the following records:

6.5.1 Keep a copy of the manufacturer's product data sheet or material safety data sheet of the solvents used for organic solvent cleaning activities.

6.5.2 Maintain a current list of solvents that are being used for organic solvent cleaning activities. The list shall include the following information:

6.5.2.1 The name of the solvent and its manufacturer's name.

6.5.2.2 The VOC content of the solvent expressed in grams per liter or lb/gallon.

6.5.2.3 When the solvent is a mixture of different materials that are blended by the person, the mix ratio of the batch shall be recorded and the VOC content of the batch shall be calculated and recorded in order to determine compliance with the specified limits of VOC content.

6.5.3 The quantity of solvent used for solvent cleaning activities.

The following conditions will be included on the proposed ATCs, except -10, as a mechanism to enforce compliance with the requirements of Section 6.0:

- {4896} The permittee shall maintain records on a daily basis and have available at all times the following: a current list of all coatings used that includes the material name and manufacturer, application method, coating type and mix ratio specific to the coating, the VOC Actual for Coatings and VOC Regulatory for Coatings as applied, and the quantity of each type of coating used; current manufacturer specification sheets, material safety data sheets (MSDS), technical data sheets, or air quality data sheets, which list the VOC Actual for Coatings and VOC Regulatory for Coatings of each ready-to-spray coating and automotive coating components; and purchase records identifying the coating type, name, and volume of coatings bought. [District Rules 2201 and 4612]

- {4243} The permittee shall keep the following records for each solvent used for cleaning activities: the quantity of solvent used; a copy of the manufacturer's product data or material safety data sheet (MSDS); the solvent's name and manufacturer, the VOC content of the solvent in grams/liter or pounds/gallon, and the mix ratio and VOC content of the batch when the solvent is a mixture of different materials blended by the permittee. [District Rules 2201 and 4612]

- {4244} Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 2201 and 4612]

Therefore, compliance with the requirements of this rule is expected.

Rule 4801 Sulfur Compounds

C-1080-11:
A person shall not discharge into the atmosphere sulfur compounds, which would exist as a liquid or gas at standard conditions, exceeding in concentration at the point of discharge: 0.2 % by volume calculated as SO_2, on a dry basis averaged over 15 consecutive minutes.

Using the ideal gas equation and the emission factors presented in Section VII, the sulfur compound emissions are calculated as follows:

Volume $SO_2 = \frac{n\,RT}{P}$

With:

N = moles SO_2
T (Standard Temperature) = 60°F = 520°R
P (Standard Pressure) = 14.7 psi
R (Universal Gas Constant) = $\frac{10.73 psi \cdot ft^3}{lb \cdot mol \cdot {}^\circ R}$

EPA F-Factor for Natural Gas: 8,710 dscf/MMBtu at 68 °F, equivalent to

$$Corrected\ \ F-factor = \left(\frac{8{,}710\,dscf}{MMBtu}\right)\times\left(\frac{60^\circ F + 459.6}{68^\circ F + 459.6}\right) = 8{,}578\,\frac{dscf}{MMBtu}\ \ at\ \ 60^\circ F$$

Natural Gas Combustion:

$$\frac{0.00285\,lb-SOx}{MMBtu}\times\frac{MMBtu}{8{,}578\,dscf}\times\frac{1\,lb\cdot mol}{64\,lb}\times\frac{10.73\,psi\cdot ft^3}{lb\cdot mol\cdot{}^\circ R}\times\frac{520^\circ R}{14.7\,psi}\times\frac{1{,}000{,}000\cdot parts}{million}=1.97\,\frac{parts}{million}$$

$$SulfurConcentration=1.97\,\frac{parts}{million}$$ < 2,000 ppmv (or 0.2%)

Therefore, compliance with District Rule 4801 requirements is expected.

California Health & Safety Code 42301.6 (School Notice)

The District has verified that this site is not located within 1,000 feet of a school. Therefore, pursuant to California Health and Safety Code 42301.6, a school notice is not required.

California Environmental Quality Act (CEQA)

CEQA requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The District adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities;
- Identify the ways that environmental damage can be avoided or significantly reduced;
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

Greenhouse Gas (GHG) Significance Determination

It is determined that no other agency has prepared or will prepare an environmental review document for the project. Thus the District is the Lead Agency for this project.

On December 17, 2009, the District's Governing Board adopted a policy, APR 2005, *Addressing GHG Emission Impacts for Stationary Source Projects Under CEQA When Serving as the Lead Agency,* for addressing GHG emission impacts when the District is Lead Agency under CEQA and approved the District's guidance document for use by other agencies when addressing GHG impacts as lead agencies under CEQA. Under this policy, the District's determination of significance of project-specific GHG emissions is founded on the principal that projects with GHG emission reductions consistent with AB 32 emission reduction targets are considered to have a less than significant impact on global climate change. Consistent with District Policy 2005, projects complying with an approved GHG emission reduction plan or GHG mitigation program, which avoids or substantially reduces GHG emissions within the geographic area in which the project is located, would be determined to have a less than significant individual and cumulative impact for GHG emission.

The California Air Resources Board (ARB) adopted a Cap-and-Trade regulation as part one of the strategies identified for AB 32. This Cap-and-Trade regulation is a statewide plan, supported by a CEQA compliant environmental review document, aimed at reducing or mitigating GHG emissions from targeted industries. Facilities subject to the Cap-and-Trade regulation are subject to an industry-wide cap on overall GHG emissions. Any growth in emissions must be accounted for under that cap such that a corresponding and equivalent reduction in emissions must occur to allow any increase. Further, the cap decreases over time, resulting in an overall decrease in GHG emissions.

Under District policy APR 2025, *CEQA Determinations of Significance for Projects Subject to ARB's GHG Cap-and-Trade Regulation*, the District finds that the Cap-and-Trade is a regulation plan approved by ARB, consistent with AB32 emission reduction targets, and supported by a CEQA compliant environmental review document. As such, consistent with District Policy 2005, projects complying with Cap-and-Trade requirements are determined to have a less than significant individual and cumulative impact for GHG emissions.

The GHG emissions increases associated with this project result from the combustion of fossil fuel(s), other than jet fuel, delivered from suppliers subject to the Cap-and-Trade regulation. Therefore, as discussed above, consistent with District Policies APR 2005 and APR 2025, the District concludes that the GHG emissions increases associated with this project would have a less than significant individual and cumulative impact on global climate change.

District CEQA Findings

The District is the Lead Agency for this project because there is no other agency with broader statutory authority over this project. The District performed an Engineering Evaluation (this document) for the proposed project and determined that the activity will occur at an existing facility and the project involves negligible expansion of the existing use. Furthermore, the District determined that the activity will not have a significant effect on the environment. Therefore, the District finds that the activity is categorically exempt from the provisions of CEQA pursuant to CEQA Guideline § 15301 (Existing Facilities), and finds that the project is exempt per the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment (CEQA Guidelines §15061(b)(3)).

Indemnification Agreement/Letter of Credit Determination

According to District Policy APR 2010 (CEQA Implementation Policy), when the District is the Lead or Responsible Agency for CEQA purposes, an indemnification agreement and/or a letter of credit may be required. The decision to require an indemnity agreement and/or a letter of credit is based on a case-by-case analysis of a particular project's potential for litigation risk, which in turn may be based on a project's potential to generate public concern, its potential for significant impacts, and the project proponent's ability to pay for the costs of litigation without a letter of credit, among other factors.

The criteria pollutant emissions and toxic air contaminant emissions associated with the proposed project are not significant, and there is minimal potential for public concern for this particular type of facility/operation. Therefore, an Indemnification Agreement and/or a Letter of Credit will not be required for this project in the absence of expressed public concern.

IX. Recommendation

Compliance with all applicable rules and regulations is expected. Pending a successful NSR Public Noticing period, issue ATCs C-1080-1-4, -2-5, -4-2, -7-2, -9-2, -10-2, -11-0, -12-0 subject to the permit conditions on the attached draft ATCs in Appendix A.

X. Billing Information

Annual Permit Fees			
Permit Number	Fee Schedule	Fee Description	Annual Fee
C-1080-1-4	3020-01-A	7 electrical hp	$97.00
C-1080-2-5	3020-01-A	10 electrical hp	$97.00
C-1080-4-2	3020-01-A	4 electrical hp	$97.00
C-1080-7-2	3020-02-D	3 electrical hp*	$345.00
C-1080-9-2	3020-01-A	10 electrical hp	$97.00
C-1080-10-2	3020-03-A	40kVa	$97.00
C-1080-11-0	3020-02-F	3.0 MMBtu/hr	$666.00
C-1080-12-0	3020-01-C	87.5 electrical hp	$217.00

* As taken from the original application submitted under project C-1063643.

Appendices

A: Draft ATCs
B: Quarterly Net Emissions Change
C: BACT Guideline
D: Top-Down BACT Analysis
E: HRA/ AAQA Summary
F: Compliance Certification
G: Statewide Compliance Certification
H: Current Permits to Operate
I: Emissions Inventory for 2015 and 2016

APPENDIX A
Draft ATCs

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

PERMIT NO: C-1080-1-4 **ISSUANCE DATE:** DRAFT

LEGAL OWNER OR OPERATOR: SCELZI ENTERPRISES INC
MAILING ADDRESS: 2286 E DATE AVE
FRESNO, CA 93706

LOCATION: 2772 S CHERRY AVE
FRESNO, CA 93706

EQUIPMENT DESCRIPTION:
MODIFICATION OF MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATION WITH HVLP SPRAY GUN(S), A PAINT SPRAY BOOTH WITH DRY EXHAUST FILTERS, AN ENCLOSED SPRAY GUN CLEANER, AND A PERMIT EXEMPT NATURAL GAS DRYING BURNER < 20.0 MMBTU/DAY HEAT INPUT: ESTABLISH A DAILY PM10 EMISSION LIMIT AND A FACILITY-WIDE PM10 EMISSION LIMIT

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. 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] Federally Enforceable Through Title V Permit
6. All coating, including application of primer, shall be conducted in the booth with filters in place, fan(s) operating, and doors closed. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services
C-1080-1-4 Aug 30 2017 10:24AM -- GARCIAJ Joint Inspection NOT Required

7. Only high-volume low-pressure (HVLP) spray equipment, electrostatic, brush, dip, or roll coating application equipment, or other application equipment approved by the District in writing, shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4612] Federally Enforceable Through Title V Permit

8. If an HVLP spray gun is used, the operator must demonstrate that the spray gun operates between 0.1 and 10 pounds per square inch, gauge, (psig) air atomizing pressure, measured dynamically at the center of the air cap and at the air horns. For a gun permanently labeled HVLP by the manufacturer, a satisfactory demonstration shall either be in the form of manufacturer's published technical information or by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer of the gun. For a gun not permanently labeled HVLP by the manufacturer, a satisfactory demonstration shall be based on manufacturer's published technical material and by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer of the gun. [District Rule 4612] Federally Enforceable Through Title V Permit

9. All fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners shall be stored in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4612] Federally Enforceable Through Title V Permit

10. No coatings, solvents, or additives containing any of the following compounds shall be used: lead compounds, hexavalent chromium, cadmium, and/or nickel compounds. [District Rule 4102 and 40 CFR 63, Subpart HHHHHH] Federally Enforceable Through Title V Permit

11. For solvent cleaning operations other than for bug and tar removal, the permittee shall not use solvents that have VOC content greater than 25 g/l (0.21 lb/gal) of cleaning material. [District Rule 4612] Federally Enforceable Through Title V Permit

12. For bug and tar removal, the permittee shall not use any material other than bug and tar remover regulated under the Consumer Products Regulation (California Code of Regulations Section 94507 et seq.). [District Rule 4612] Federally Enforceable Through Title V Permit

13. The VOC Regulatory content of coatings, as applied, shall not exceed any of the following limits: adhesion promoter 540 g/l (4.5 lb/gal), clear coating 250 g/l (2.1 lb/gal), color coating 420 g/l (3.5 lb/gal), multi-color coating 680 g/l (5.7 lb/gal), pretreatment coating 660 g/l (5.5 lb/gal), primer 250 g/l (2.1 lb/gal), primer sealer 250 g/l (2.1 lb/gal), single-stage coating 340 g/l (2.8 lb/gal), temporary protective coating 60 g/l (0.5 lb/gal), truck bed liner coating 310 g/l (2.6 lb/gal), underbody coating 430 g/l (3.6 lb/gal), uniform finish coating 540 g/l (4.5 lb/gal), and any other coating type 250 g/l (2.1 lb/gal). The VOC Regulatory content for coatings shall be defined as the VOC in grams per liter of coating (or pounds per gallon of coating), excluding water and exempt compounds. [District Rules 2201 and 4612] Federally Enforceable Through Title V Permit

14. Facility-wide VOC emissions shall not exceed 149.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit

15. Facility-wide PM10 emissions shall not exceed 29,199 pounds in any rolling 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit

16. The PM10 emission rate from the coating operation shall not exceed 50.0 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit

17. On a monthly basis, the permittee shall calculate and record the PM10 emissions in pounds from this unit for the prior calendar month. [District Rule 1070] Federally Enforceable Through Title V Permit

18. Permittee shall maintain daily records of quantity (gallons) and solids content of coatings applied. Permittee shall also maintain daily records of VOC content as applied (lb/gal) of each coating used, quantity (gallons) of each coating used, and calculated daily VOC emissions. [District Rule 1070] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

19. The permittee shall maintain records on a daily basis and have available at all times the following: a current list of all coatings used that includes the material name and manufacturer, application method, coating type and mix ratio specific to the coating, the VOC Actual for Coatings and VOC Regulatory for Coatings as applied, and the quantity of each type of coating used; current manufacturer specification sheets, material safety data sheets (MSDS), technical data sheets, or air quality data sheets, which list the VOC Actual for Coatings and VOC Regulatory for Coatings of each ready-to-spray coating and automotive coating components; and purchase records identifying the coating type, name, and volume of coatings bought. [District Rule 4612] Federally Enforceable Through Title V Permit

20. The permittee shall keep the following records for each solvent used for cleaning activities: the quantity of solvent used; a copy of the manufacturer's product data or material safety data sheet (MSDS); the solvent's name and manufacturer, the VOC content of the solvent in grams/liter or pounds/gallon, and the mix ratio and VOC content of the batch when the solvent is a mixture of different materials blended by the permittee. [District Rule 4612] Federally Enforceable Through Title V Permit

21. Daily VOC emissions of each coating and/or solvent shall be calculated as follows: daily VOC emissions = VOC content (lb/gallon) as applied x usage (gallon/day). Total daily VOC emissions is the sum of VOC emissions from all coatings and/or solvents used. [District Rule 2201] Federally Enforceable Through Title V Permit

22. Daily PM10 emissions of each coating shall be calculated as follows: daily PM10 emissions = coating density (lb/gallon) x coating solids content (%) x usage (gallons/day) x 0.0125 . Total daily PM10 emissions is the sum of PM10 emissions from all coatings used. [District Rule 2201] Federally Enforceable Through Title V Permit

23. On a monthly basis, the permittee shall calculate and record the facility-wide PM10 emissions in pounds for the prior 12 calendar month period. The facility-wide PM10 emissions shall be calculated by summing the PM10 emissions from the previous 12 calendar months from every permitted unit at this facility. [District Rule 1070] Federally Enforceable Through Title V Permit

24. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4612] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

PERMIT NO: C-1080-2-5

ISSUANCE DATE: DRAFT

LEGAL OWNER OR OPERATOR: SCELZI ENTERPRISES INC
MAILING ADDRESS: 2286 E DATE AVE
FRESNO, CA 93706

LOCATION: 2772 S CHERRY AVE
FRESNO, CA 93706

EQUIPMENT DESCRIPTION:
MODIFICATION OF MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATION AND TRUCK BED LINER COATING OPERATION WITH HVLP SPRAY GUN(S), PLURAL COMPONENT APPLICATORS, A PAINT SPRAY BOOTH WITH DRY EXHAUST FILTERS AND A PERMIT EXEMPT NATURAL GAS DRYING BURNER < 20.0 MMBTU/DAY HEAT INPUT: ESTABLISH A FACILITY-WIDE PM10 EMISSION LIMIT

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. 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] Federally Enforceable Through Title V Permit
6. All coating, including application of primer, shall be conducted in the booth with filters in place, fan(s) operating, and doors closed. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services

Central Regional Office • 1990 E. Gettysburg Ave. • Fresno, CA 93726 • (559) 230-5900 • Fax (559) 230-6061

7. For all coating application, except truck bed liner coating application, only high-volume low-pressure (HVLP) spray equipment, electrostatic, brush, dip, or roll coating application equipment, or other application equipment approved by the District in writing, shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4612] Federally Enforceable Through Title V Permit

8. If an HVLP spray gun is used, the operator must demonstrate that the spray gun operates between 0.1 and 10 pounds per square inch, gauge, (psig) air atomizing pressure, measured dynamically at the center of the air cap and at the air horns. For a gun permanently labeled HVLP by the manufacturer, a satisfactory demonstration shall either be in the form of manufacturer's published technical information or by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer of the gun. For a gun not permanently labeled HVLP by the manufacturer, a satisfactory demonstration shall be based on manufacturer's published technical material and by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer of the gun. [District Rule 4612] Federally Enforceable Through Title V Permit

9. All fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners shall be stored in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4612] Federally Enforceable Through Title V Permit

10. No coatings, solvents, or additives containing any of the following compounds shall be used: lead compounds, hexavalent chromium, cadmium, and/or nickel compounds. [District Rule 4102 and 40 CFR 63, Subpart HHHHHH] Federally Enforceable Through Title V Permit

11. For solvent cleaning operations other than for bug and tar removal, the permittee shall not use solvents that have VOC content greater than 25 g/l (0.21 lb/gal) of cleaning material. [District Rule 4612] Federally Enforceable Through Title V Permit

12. For bug and tar removal, the permittee shall not use any material other than bug and tar remover regulated under the Consumer Products Regulation (California Code of Regulations Section 94507 et seq.). [District Rule 4612] Federally Enforceable Through Title V Permit

13. The VOC Regulatory content of coatings, as applied, shall not exceed any of the following limits: adhesion promoter 540 g/l (4.5 lb/gal), clear coating 250 g/l (2.1 lb/gal), color coating 420 g/l (3.5 lb/gal), multi-color coating 680 g/l (5.7 lb/gal), pretreatment coating 660 g/l (5.5 lb/gal), primer 250 g/l (2.1 lb/gal), primer sealer 250 g/l (2.1 lb/gal), single-stage coating 340 g/l (2.8 lb/gal), temporary protective coating 60 g/l (0.5 lb/gal), truck bed liner coating 310 g/l (2.6 lb/gal), underbody coating 430 g/l (3.6 lb/gal), uniform finish coating 540 g/l (4.5 lb/gal), and any other coating type 250 g/l (2.1 lb/gal). The VOC Regulatory content for coatings shall be defined as the VOC in grams per liter of coating (or pounds per gallon of coating), excluding water and exempt compounds. [District Rules 2201 and 4612] Federally Enforceable Through Title V Permit

14. Facility-wide VOC emissions shall not exceed 149.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit

15. The VOC emission rate from the truck bed liner coating operation shall not exceed 0.7 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit

16. The total VOC emission rate from this unit shall not exceed 50.0 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit

17. Facility-wide PM10 emissions shall not exceed 29,199 pounds in any rolling 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit

18. The PM10 emission rate from the truck bed liner coating operation shall not exceed 3.0 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit

19. The total PM10 emission rate from this unit shall not exceed 14.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit

20. On a monthly basis, the permittee shall calculate and record the PM10 emissions in pounds from this unit for the prior calendar month. [District Rule 1070] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

21. Permittee shall maintain daily records of quantity (gallons) and solids content of coatings applied. Permittee shall also maintain daily records of VOC content as applied (lb/gal) of each coating used, quantity (gallons) of each coating used, and calculated daily VOC emissions. [District Rule 1070] Federally Enforceable Through Title V Permit

22. The permittee shall maintain records on a daily basis and have available at all times the following: a current list of all coatings used that includes the material name and manufacturer, application method, coating type and mix ratio specific to the coating, the VOC Actual for Coatings and VOC Regulatory for Coatings as applied, and the quantity of each type of coating used; current manufacturer specification sheets, material safety data sheets (MSDS), technical data sheets, or air quality data sheets, which list the VOC Actual for Coatings and VOC Regulatory for Coatings of each ready-to-spray coating and automotive coating components; and purchase records identifying the coating type, name, and volume of coatings bought. [District Rule 4612] Federally Enforceable Through Title V Permit

23. The permittee shall keep the following records for each solvent used for cleaning activities: the quantity of solvent used; a copy of the manufacturer's product data or material safety data sheet (MSDS); the solvent's name and manufacturer, the VOC content of the solvent in grams/liter or pounds/gallon, and the mix ratio and VOC content of the batch when the solvent is a mixture of different materials blended by the permittee. [District Rule 4612] Federally Enforceable Through Title V Permit

24. Daily VOC emissions of each coating and/or solvent shall be calculated as follows: daily VOC emissions = VOC content (lb/gallon) as applied x usage (gallon/day). Total daily VOC emissions is the sum of VOC emissions from all coatings and/or solvents used. [District Rule 2201] Federally Enforceable Through Title V Permit

25. Daily PM10 emissions of each coating shall be calculated as follows: daily PM10 emissions = coating density (lb/gallon) x coating solids content (%) x usage (gallons/day) x 0.0125 . Total daily PM10 emissions is the sum of PM10 emissions from all coatings used. [District Rule 2201] Federally Enforceable Through Title V Permit

26. On a monthly basis, the permittee shall calculate and record the facility-wide PM10 emissions in pounds for the prior 12 calendar month period. The facility-wide PM10 emissions shall be calculated by summing the PM10 emissions from the previous 12 calendar months from every permitted unit at this facility. [District Rule 1070] Federally Enforceable Through Title V Permit

27. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4612] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

PERMIT NO: C-1080-4-2

ISSUANCE DATE: DRAFT

LEGAL OWNER OR OPERATOR: SCELZI ENTERPRISES INC
MAILING ADDRESS: 2286 E DATE AVE
FRESNO, CA 93706

LOCATION: 2772 S CHERRY AVE
FRESNO, CA 93706

EQUIPMENT DESCRIPTION:
MODIFICATION OF MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATION WITH HVLP SPRAY GUNS, A PAINT SPRAY BOOTH WITH DRY EXHAUST FILTERS, AN ENCLOSED SPRAY GUN CLEANER, A PERMIT EXEMPT NATURAL GAS DRYING BURNER < 20.0 MMBTU/DAY HEAT INPUT, AND AN ATTACHED DRYING ROOM WITH A PERMIT EXEMPT NATURAL GAS DRYING BURNER < 20.0 MMBTU/DAY HEAT INPUT: ESTABLISH A DAILY PM10 EMISSION LIMIT AND A FACILITY-WIDE PM10 EMISSION LIMIT

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. 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] Federally Enforceable Through Title V Permit
6. All coating, including application of primer, shall be conducted in the booth with filters in place, fan(s) operating, and doors closed. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services

Central Regional Office • 1990 E. Gettysburg Ave. • Fresno, CA 93726 • (559) 230-5900 • Fax (559) 230-6061

7. Only high-volume low-pressure (HVLP) spray equipment, electrostatic, brush, dip, or roll coating application equipment, or other application equipment approved by the District in writing, shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4612] Federally Enforceable Through Title V Permit

8. If an HVLP spray gun is used, the operator must demonstrate that the spray gun operates between 0.1 and 10 pounds per square inch, gauge, (psig) air atomizing pressure, measured dynamically at the center of the air cap and at the air horns. For a gun permanently labeled HVLP by the manufacturer, a satisfactory demonstration shall either be in the form of manufacturer's published technical information or by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer of the gun. For a gun not permanently labeled HVLP by the manufacturer, a satisfactory demonstration shall be based on manufacturer's published technical material and by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer of the gun. [District Rule 4612] Federally Enforceable Through Title V Permit

9. All fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners shall be stored in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4612] Federally Enforceable Through Title V Permit

10. No coatings, solvents, or additives containing any of the following compounds shall be used: lead compounds, hexavalent chromium, cadmium, and/or nickel compounds. [District Rule 4102 and 40 CFR 63, Subpart HHHHHH] Federally Enforceable Through Title V Permit

11. For solvent cleaning operations other than for bug and tar removal, the permittee shall not use solvents that have VOC content greater than 25 g/l (0.21 lb/gal) of cleaning material. [District Rule 4612] Federally Enforceable Through Title V Permit

12. For bug and tar removal, the permittee shall not use any material other than bug and tar remover regulated under the Consumer Products Regulation (California Code of Regulations Section 94507 et seq.). [District Rule 4612] Federally Enforceable Through Title V Permit

13. The VOC Regulatory content of coatings, as applied, shall not exceed any of the following limits: adhesion promoter 540 g/l (4.5 lb/gal), clear coating 250 g/l (2.1 lb/gal), color coating 420 g/l (3.5 lb/gal), multi-color coating 680 g/l (5.7 lb/gal), pretreatment coating 660 g/l (5.5 lb/gal), primer 250 g/l (2.1 lb/gal), primer sealer 250 g/l (2.1 lb/gal), single-stage coating 340 g/l (2.8 lb/gal), temporary protective coating 60 g/l (0.5 lb/gal), truck bed liner coating 310 g/l (2.6 lb/gal), underbody coating 430 g/l (3.6 lb/gal), uniform finish coating 540 g/l (4.5 lb/gal), and any other coating type 250 g/l (2.1 lb/gal). The VOC Regulatory content for coatings shall be defined as the VOC in grams per liter of coating (or pounds per gallon of coating), excluding water and exempt compounds. [District Rules 2201 and 4612] Federally Enforceable Through Title V Permit

14. Facility-wide VOC emissions shall not exceed 149.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit

15. Facility-wide PM10 emissions shall not exceed 29,199 pounds in any rolling 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit

16. The PM10 emission rate from the coating operation shall not exceed 50.0 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit

17. On a monthly basis, the permittee shall calculate and record the PM10 emissions in pounds from this unit for the prior calendar month. [District Rule 1070] Federally Enforceable Through Title V Permit

18. Permittee shall maintain daily records of quantity (gallons) and solids content of coatings applied. Permittee shall also maintain daily records of VOC content as applied (lb/gal) of each coating used, quantity (gallons) of each coating used, and calculated daily VOC emissions. [District Rule 1070] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

19. The permittee shall maintain records on a daily basis and have available at all times the following: a current list of all coatings used that includes the material name and manufacturer, application method, coating type and mix ratio specific to the coating, the VOC Actual for Coatings and VOC Regulatory for Coatings as applied, and the quantity of each type of coating used; current manufacturer specification sheets, material safety data sheets (MSDS), technical data sheets, or air quality data sheets, which list the VOC Actual for Coatings and VOC Regulatory for Coatings of each ready-to-spray coating and automotive coating components; and purchase records identifying the coating type, name, and volume of coatings bought. [District Rule 4612] Federally Enforceable Through Title V Permit

20. The permittee shall keep the following records for each solvent used for cleaning activities: the quantity of solvent used; a copy of the manufacturer's product data or material safety data sheet (MSDS); the solvent's name and manufacturer, the VOC content of the solvent in grams/liter or pounds/gallon, and the mix ratio and VOC content of the batch when the solvent is a mixture of different materials blended by the permittee. [District Rule 4612] Federally Enforceable Through Title V Permit

21. Daily VOC emissions of each coating and/or solvent shall be calculated as follows: daily VOC emissions = VOC content (lb/gallon) as applied x usage (gallon/day). Total daily VOC emissions is the sum of VOC emissions from all coatings and/or solvents used. [District Rule 2201] Federally Enforceable Through Title V Permit

22. Daily PM10 emissions of each coating shall be calculated as follows: daily PM10 emissions = coating density (lb/gallon) x coating solids content (%) x usage (gallons/day) x 0.0125 . Total daily PM10 emissions is the sum of PM10 emissions from all coatings used. [District Rule 2201] Federally Enforceable Through Title V Permit

23. On a monthly basis, the permittee shall calculate and record the facility-wide PM10 emissions in pounds for the prior 12 calendar month period. The facility-wide PM10 emissions shall be calculated by summing the PM10 emissions from the previous 12 calendar months from every permitted unit at this facility. [District Rule 1070] Federally Enforceable Through Title V Permit

24. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4612] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

PERMIT NO: C-1080-7-2

ISSUANCE DATE: DRAFT

LEGAL OWNER OR OPERATOR: SCELZI ENTERPRISES INC
MAILING ADDRESS: 2286 E DATE AVE
FRESNO, CA 93706

LOCATION: 2772 S CHERRY AVE
FRESNO, CA 93706

EQUIPMENT DESCRIPTION:
MODIFICATION OF MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATION WITH HVLP SPRAY GUN(S), A PAINT SPRAY BOOTH WITH DRY EXHAUST FILTERS, AN ATTACHED DRYING BOOTH WITH A 1.075 MMBTU/HR NATURAL GAS-FIRED DRYING BURNER AND AN ENCLOSED SPRAY GUN CLEANER: ESTABLISH A FACILITY-WIDE PM10 EMISSION LIMIT AND DESIGNATE THE NATURAL GAS DRYING BURNER AS PERMIT EXEMPT (< 20.0 MMBTU/DAY HEAT INPUT)

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. 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] Federally Enforceable Through Title V Permit
6. All coating, including application of primer, shall be conducted in the booth with filters in place, fan(s) operating, and doors closed. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services

C-1080-7-2 Sep 11 2017 6:48PM – GARCIAJ Joint Inspection NOT Required

7. Only high-volume low-pressure (HVLP) spray equipment, electrostatic, brush, dip, or roll coating application equipment, or other application equipment approved by the District in writing, shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4612] Federally Enforceable Through Title V Permit

8. If an HVLP spray gun is used, the operator must demonstrate that the spray gun operates between 0.1 and 10 pounds per square inch, gauge, (psig) air atomizing pressure, measured dynamically at the center of the air cap and at the air horns. For a gun permanently labeled HVLP by the manufacturer, a satisfactory demonstration shall either be in the form of manufacturer's published technical information or by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer of the gun. For a gun not permanently labeled HVLP by the manufacturer, a satisfactory demonstration shall be based on manufacturer's published technical material and by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer of the gun. [District Rule 4612] Federally Enforceable Through Title V Permit

9. All fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners shall be stored in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4612] Federally Enforceable Through Title V Permit

10. No coatings, solvents, or additives containing any of the following compounds shall be used: lead compounds, hexavalent chromium, cadmium, and/or nickel compounds. [District Rule 4102 and 40 CFR 63, Subpart HHHHHH] Federally Enforceable Through Title V Permit

11. For solvent cleaning operations other than for bug and tar removal, the permittee shall not use solvents that have VOC content greater than 25 g/l (0.21 lb/gal) of cleaning material. [District Rule 4612] Federally Enforceable Through Title V Permit

12. For bug and tar removal, the permittee shall not use any material other than bug and tar remover regulated under the Consumer Products Regulation (California Code of Regulations Section 94507 et seq.). [District Rule 4612] Federally Enforceable Through Title V Permit

13. The VOC Regulatory content of coatings, as applied, shall not exceed any of the following limits: adhesion promoter 540 g/l (4.5 lb/gal), clear coating 250 g/l (2.1 lb/gal), color coating 420 g/l (3.5 lb/gal), multi-color coating 680 g/l (5.7 lb/gal), pretreatment coating 660 g/l (5.5 lb/gal), primer 250 g/l (2.1 lb/gal), primer sealer 250 g/l (2.1 lb/gal), single-stage coating 340 g/l (2.8 lb/gal), temporary protective coating 60 g/l (0.5 lb/gal), truck bed liner coating 310 g/l (2.6 lb/gal), underbody coating 430 g/l (3.6 lb/gal), uniform finish coating 540 g/l (4.5 lb/gal), and any other coating type 250 g/l (2.1 lb/gal). The VOC Regulatory content for coatings shall be defined as the VOC in grams per liter of coating (or pounds per gallon of coating), excluding water and exempt compounds. [District Rules 2201 and 4612] Federally Enforceable Through Title V Permit

14. Facility-wide VOC emissions shall not exceed 149.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit

15. The VOC emission rate from this unit shall not exceed 99.0 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit

16. Facility-wide PM10 emissions shall not exceed 29,199 pounds in any rolling 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit

17. The PM10 emission rate from this unit shall not exceed 23.3 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit

18. On a monthly basis, the permittee shall calculate and record the PM10 emissions in pounds from this unit for the prior calendar month. [District Rule 1070] Federally Enforceable Through Title V Permit

19. Permittee shall maintain daily records of quantity (gallons) and solids content of coatings applied. Permittee shall also maintain daily records of VOC content as applied (lb/gal) of each coating used, quantity (gallons) of each coating used, and calculated daily VOC emissions. [District Rule 1070] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

20. The permittee shall maintain records on a daily basis and have available at all times the following: a current list of all coatings used that includes the material name and manufacturer, application method, coating type and mix ratio specific to the coating, the VOC Actual for Coatings and VOC Regulatory for Coatings as applied, and the quantity of each type of coating used; current manufacturer specification sheets, material safety data sheets (MSDS), technical data sheets, or air quality data sheets, which list the VOC Actual for Coatings and VOC Regulatory for Coatings of each ready-to-spray coating and automotive coating components; and purchase records identifying the coating type, name, and volume of coatings bought. [District Rule 4612] Federally Enforceable Through Title V Permit

21. The permittee shall keep the following records for each solvent used for cleaning activities: the quantity of solvent used; a copy of the manufacturer's product data or material safety data sheet (MSDS); the solvent's name and manufacturer, the VOC content of the solvent in grams/liter or pounds/gallon, and the mix ratio and VOC content of the batch when the solvent is a mixture of different materials blended by the permittee. [District Rule 4612] Federally Enforceable Through Title V Permit

22. Daily VOC emissions of each coating and/or solvent shall be calculated as follows: daily VOC emissions = VOC content (lb/gallon) as applied x usage (gallon/day). Total daily VOC emissions is the sum of VOC emissions from all coatings and/or solvents used. [District Rule 2201] Federally Enforceable Through Title V Permit

23. Daily PM10 emissions of each coating shall be calculated as follows: daily PM10 emissions = coating density (lb/gallon) x coating solids content (%) x usage (gallons/day) x 0.0125 . Total daily PM10 emissions is the sum of PM10 emissions from all coatings used. [District Rule 1070] Federally Enforceable Through Title V Permit

24. On a monthly basis, the permittee shall calculate and record the facility-wide PM10 emissions in pounds for the prior 12 calendar month period. The facility-wide PM10 emissions shall be calculated by summing the PM10 emissions from the previous 12 calendar months from every permitted unit at this facility. [District Rule 1070] Federally Enforceable Through Title V Permit

25. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4612] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

PERMIT NO: C-1080-9-2

ISSUANCE DATE: DRAFT

LEGAL OWNER OR OPERATOR: SCELZI ENTERPRISES INC
MAILING ADDRESS: 2286 E DATE AVE
FRESNO, CA 93706

LOCATION: 2772 S CHERRY AVE
FRESNO, CA 93706

EQUIPMENT DESCRIPTION:
MODIFICATION OF MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATION (UNDERCOATING OPERATION) WITH AIRLESS SPRAY GUN(S) AND AN ENCLOSED SPRAY GUN CLEANER: ESTABLISH A DAILY PM10 EMISSION LIMIT AND A FACILITY-WIDE PM10 EMISSION LIMIT

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. 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] Federally Enforceable Through Title V Permit
6. Only high-volume low-pressure (HVLP) spray equipment, electrostatic, brush, dip, or roll coating application equipment, or other application equipment approved by the District in writing, shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4612] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services
C-1080-9-2 Sep 12 2017 11:26AM -- GARCIAJ Joint Inspection NOT Required

7. If an HVLP spray gun is used, the operator must demonstrate that the spray gun operates between 0.1 and 10 pounds per square inch, gauge, (psig) air atomizing pressure, measured dynamically at the center of the air cap and at the air horns. For a gun permanently labeled HVLP by the manufacturer, a satisfactory demonstration shall either be in the form of manufacturer's published technical information or by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer of the gun. For a gun not permanently labeled HVLP by the manufacturer, a satisfactory demonstration shall be based on manufacturer's published technical material and by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer of the gun. [District Rule 4612] Federally Enforceable Through Title V Permit

8. All fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners shall be stored in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4612] Federally Enforceable Through Title V Permit

9. No coatings, solvents, or additives containing any of the following compounds shall be used: lead compounds, hexavalent chromium, cadmium, and/or nickel compounds. [District Rule 4102 and 40 CFR 63, Subpart HHHHHH] Federally Enforceable Through Title V Permit

10. For solvent cleaning operations other than for bug and tar removal, the permittee shall not use solvents that have VOC content greater than 25 g/l (0.21 lb/gal) of cleaning material. [District Rule 4612] Federally Enforceable Through Title V Permit

11. For bug and tar removal, the permittee shall not use any material other than bug and tar remover regulated under the Consumer Products Regulation (California Code of Regulations Section 94507 et seq.). [District Rule 4612] Federally Enforceable Through Title V Permit

12. The VOC Regulatory content of coatings, as applied, shall not exceed any of the following limits: adhesion promoter 540 g/l (4.5 lb/gal), clear coating 250 g/l (2.1 lb/gal), color coating 420 g/l (3.5 lb/gal), multi-color coating 680 g/l (5.7 lb/gal), pretreatment coating 660 g/l (5.5 lb/gal), primer 250 g/l (2.1 lb/gal), primer sealer 250 g/l (2.1 lb/gal), single-stage coating 340 g/l (2.8 lb/gal), temporary protective coating 60 g/l (0.5 lb/gal), truck bed liner coating 310 g/l (2.6 lb/gal), underbody coating 430 g/l (3.6 lb/gal), uniform finish coating 540 g/l (4.5 lb/gal), and any other coating type 250 g/l (2.1 lb/gal). The VOC Regulatory content for coatings shall be defined as the VOC in grams per liter of coating (or pounds per gallon of coating), excluding water and exempt compounds. [District Rules 2201 and 4612] Federally Enforceable Through Title V Permit

13. Facility-wide VOC emissions shall not exceed 149.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit

14. Facility-wide PM10 emissions shall not exceed 29,199 pounds in any rolling 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit

15. The PM10 emission rate from the coating operation shall not exceed 50.0 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit

16. On a monthly basis, the permittee shall calculate and record the PM10 emissions in pounds from this unit for the prior calendar month. [District Rule 1070] Federally Enforceable Through Title V Permit

17. Permittee shall maintain daily records of quantity (gallons) and solids content of coatings applied. Permittee shall also maintain daily records of VOC content as applied (lb/gal) of each coating used, quantity (gallons) of each coating used, and calculated daily VOC emissions. [District Rule 1070] Federally Enforceable Through Title V Permit

18. Total daily PM10 emissions is the sum of PM10 emissions from all coatings applied outside the booth and all coatings applied inside the booth. [District Rule 2201] Federally Enforceable Through Title V Permit

19. The permittee shall maintain records on a daily basis and have available at all times the following: a current list of all coatings used that includes the material name and manufacturer, application method, coating type and mix ratio specific to the coating, the VOC Actual for Coatings and VOC Regulatory for Coatings as applied, and the quantity of each type of coating used; current manufacturer specification sheets, material safety data sheets (MSDS), technical data sheets, or air quality data sheets, which list the VOC Actual for Coatings and VOC Regulatory for Coatings of each ready-to-spray coating and automotive coating components; and purchase records identifying the coating type, name, and volume of coatings bought. [District Rule 4612] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

20. The permittee shall keep the following records for each solvent used for cleaning activities: the quantity of solvent used; a copy of the manufacturer's product data or material safety data sheet (MSDS); the solvent's name and manufacturer, the VOC content of the solvent in grams/liter or pounds/gallon, and the mix ratio and VOC content of the batch when the solvent is a mixture of different materials blended by the permittee. [District Rule 4612] Federally Enforceable Through Title V Permit

21. Daily VOC emissions of each coating and/or solvent shall be calculated as follows: daily VOC emissions = VOC content (lb/gallon) as applied x usage (gallon/day). Total daily VOC emissions is the sum of VOC emissions from all coatings and/or solvents used. [District Rule 2201] Federally Enforceable Through Title V Permit

22. Daily PM10 emissions of each coating applied outside the booth shall be calculated as follows: daily PM10 emissions = coating density (lb/gallon) x coating solids content (%) x usage (gallons/day) x 0.25. Total daily outside the booth PM10 emissions is the sum of PM10 emissions from all coatings applied outside the booth. [District Rule 2201] Federally Enforceable Through Title V Permit

23. Daily PM10 emissions of each coating applied inside the booth shall be calculated as follows: daily PM10 emissions = coating density (lb/gallon) x coating solids content (%) x usage (gallons/day) x 0.0125. Total daily inside the booth PM10 emissions is the sum of PM10 emissions from all coatings applied inside the booth. [District Rule 2201] Federally Enforceable Through Title V Permit

24. On a monthly basis, the permittee shall calculate and record the facility-wide PM10 emissions in pounds for the prior 12 calendar month period. The facility-wide PM10 emissions shall be calculated by summing the PM10 emissions from the previous 12 calendar months from every permitted unit at this facility. [District Rule 1070] Federally Enforceable Through Title V Permit

25. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4612] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

PERMIT NO: C-1080-10-2

ISSUANCE DATE: DRAFT

LEGAL OWNER OR OPERATOR: SCELZI ENTERPRISES INC
MAILING ADDRESS: 2286 E DATE AVE
FRESNO, CA 93706

LOCATION: 2772 S CHERRY AVE
FRESNO, CA 93706

EQUIPMENT DESCRIPTION:
MODIFICATION OF METAL CUTTING OPERATION CONSISTING OF ONE 40 KVA CINCINNATI MODEL CL-440 LASER CUTTER SERVED BY AN AIRGUARD MODEL MICRO GUARD 99 DUST COLLECTOR: ESTABLISH A FACILITY-WIDE PM10 EMISSION LIMIT

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. Visible emissions from the exhaust of the dust collector serving the laser cutter 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] Federally Enforceable Through Title V Permit
6. The dust collector shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The dust collector cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services

8. Material removed from the dust collector shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The dust collector shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
10. A spare set of filters shall be maintained on the premises at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The laser cutting operation shall only cut mild steel and galvanized steel. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The maximum PM10 emission rate from the laser cutting operation is 0.013 lb per day based on 24 hours of operation [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
13. Facility-wide PM10 emissions shall not exceed 29,199 pounds in any rolling 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The dust collector shall operate at all times with a minimum differential pressure of 0 inches of water column and a maximum differential pressure of 6.5 inches water column. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The dust collector shall achieve a minimum PM10 control efficiency of 99.97%. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
16. Differential operating pressure shall be monitored and recorded on each day that the dust collector operates. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The operator shall record the date and type of metal cut whenever the laser is used. [District Rule 1070] Federally Enforceable Through Title V Permit
18. Records of all maintenance of the dust collector, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
19. On a monthly basis, the permittee shall calculate and record the PM10 emissions in pounds from this unit for the prior calendar month. [District Rule 1070] Federally Enforceable Through Title V Permit
20. On a monthly basis, the permittee shall calculate and record the facility-wide PM10 emissions in pounds for the prior 12 calendar month period. The facility-wide PM10 emissions shall be calculated by summing the PM10 emissions from the previous 12 calendar months from every permitted unit at this facility. [District Rule 1070] Federally Enforceable Through Title V Permit
21. The permittee shall maintain records of the dust collector manufacturer's guaranteed control efficiency for PM10. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
22. Records required by this permit shall be retained on-site for at least five years and shall be made readily available for District inspection on request. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

PERMIT NO: C-1080-11-0

ISSUANCE DATE: DRAFT

LEGAL OWNER OR OPERATOR: SCELZI ENTERPRISES INC
MAILING ADDRESS: 2286 E DATE AVE
FRESNO, CA 93706

LOCATION: 2772 S CHERRY AVE
FRESNO, CA 93706

EQUIPMENT DESCRIPTION:
MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATION WITH A PAINT SPRAY BOOTH WITH DRY EXHAUST FILTERS AND A 3.0 MMBTU/HR NATURAL GAS-FIRED BOOTH HEATER

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Authorities to Construct (ATCs) C-1080-1-4, -2-5, -4-2, -7-2, -9-2 and -10-2 shall be implemented concurrently with the modification and startup of the equipment authorized by this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
6. 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] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services

Central Regional Office • 1990 E. Gettysburg Ave. • Fresno, CA 93726 • (559) 230-5900 • Fax (559) 230-6061

7. All coating, including application of primer, shall be conducted in the booth with filters in place, fan(s) operating, and doors closed. [District Rule 2201] Federally Enforceable Through Title V Permit

8. Only high-volume low-pressure (HVLP) spray equipment, electrostatic, brush, dip, or roll coating application equipment, or other application equipment approved by the District in writing, shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4612] Federally Enforceable Through Title V Permit

9. If an HVLP spray gun is used, the operator must demonstrate that the spray gun operates between 0.1 and 10 pounds per square inch, gauge, (psig) air atomizing pressure, measured dynamically at the center of the air cap and at the air horns. For a gun permanently labeled HVLP by the manufacturer, a satisfactory demonstration shall either be in the form of manufacturer's published technical information or by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer of the gun. For a gun not permanently labeled HVLP by the manufacturer, a satisfactory demonstration shall be based on manufacturer's published technical material and by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer of the gun. [District Rule 4612] Federally Enforceable Through Title V Permit

10. All fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners shall be stored in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4612] Federally Enforceable Through Title V Permit

11. No coatings, solvents, or additives containing any of the following compounds shall be used: lead compounds, hexavalent chromium, cadmium, and/or nickel compounds. [District Rule 4102 and 40 CFR 63, Subpart HHHHHH] Federally Enforceable Through Title V Permit

12. For solvent cleaning operations other than for bug and tar removal, the permittee shall not use solvents that have VOC content greater than 25 g/l (0.21 lb/gal) of cleaning material. [District Rule 4612] Federally Enforceable Through Title V Permit

13. For bug and tar removal, the permittee shall not use any material other than bug and tar remover regulated under the Consumer Products Regulation (California Code of Regulations Section 94507 et seq.). [District Rule 4612] Federally Enforceable Through Title V Permit

14. The VOC Regulatory content of coatings, as applied, shall not exceed any of the following limits: adhesion promoter 540 g/l (4.5 lb/gal), clear coating 250 g/l (2.1 lb/gal), color coating 420 g/l (3.5 lb/gal), multi-color coating 680 g/l (5.7 lb/gal), pretreatment coating 660 g/l (5.5 lb/gal), primer 250 g/l (2.1 lb/gal), primer sealer 250 g/l (2.1 lb/gal), single-stage coating 340 g/l (2.8 lb/gal), temporary protective coating 60 g/l (0.5 lb/gal), truck bed liner coating 310 g/l (2.6 lb/gal), underbody coating 430 g/l (3.6 lb/gal), uniform finish coating 540 g/l (4.5 lb/gal), and any other coating type 250 g/l (2.1 lb/gal). The VOC Regulatory content for coatings shall be defined as the VOC in grams per liter of coating (or pounds per gallon of coating), excluding water and exempt compounds. [District Rules 2201 and 4612] Federally Enforceable Through Title V Permit

15. Facility-wide VOC emissions shall not exceed 149.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit

16. Facility-wide PM10 emissions shall not exceed 29,199 pounds in any rolling 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit

17. The PM10 emission rate from this unit shall not exceed 5.4 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit

18. Emissions from the burner shall not exceed any of the following limits: 0.10 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.084 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

19. The booth heater shall only be fired on PUC quality natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit

20. Permittee shall maintain daily records of quantity (gallons) and solids content of coatings applied. Permittee shall also maintain daily records of VOC content as applied (lb/gal) of each coating used, quantity (gallons) of each coating used, and calculated daily VOC emissions. [District Rule 1070] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

21. On a monthly basis, the permittee shall calculate and record the PM10 emissions in pounds from this unit for the prior calendar month. [District Rule 1070] Federally Enforceable Through Title V Permit

22. Daily VOC emissions from the booth heater shall be calculated as follows: daily VOC emissions = hours of operation (hrs/day) x 0.0165. Total daily VOC emissions is the sum of VOC emissions from all coatings and/or solvents used and from the booth heater. [District Rule 2201] Federally Enforceable Through Title V Permit

23. Daily PM10 emissions from the booth heater shall be calculated as follows: daily PM10 emissions = hours of operation (hrs/day) x 0.0228. Total daily PM10 emissions is the sum of PM10 emissions from the booth heater and all coatings used. [District Rule 1070] Federally Enforceable Through Title V Permit

24. The permittee shall maintain records on a daily basis and have available at all times the following: a current list of all coatings used that includes the material name and manufacturer, application method, coating type and mix ratio specific to the coating, the VOC Actual for Coatings and VOC Regulatory for Coatings as applied, and the quantity of each type of coating used; current manufacturer specification sheets, material safety data sheets (MSDS), technical data sheets, or air quality data sheets, which list the VOC Actual for Coatings and VOC Regulatory for Coatings of each ready-to-spray coating and automotive coating components; and purchase records identifying the coating type, name, and volume of coatings bought. [District Rule 4612] Federally Enforceable Through Title V Permit

25. The permittee shall keep the following records for each solvent used for cleaning activities: the quantity of solvent used; a copy of the manufacturer's product data or material safety data sheet (MSDS); the solvent's name and manufacturer, the VOC content of the solvent in grams/liter or pounds/gallon, and the mix ratio and VOC content of the batch when the solvent is a mixture of different materials blended by the permittee. [District Rule 4612] Federally Enforceable Through Title V Permit

26. Daily VOC emissions of each coating and/or solvent shall be calculated as follows: daily VOC emissions = VOC content (lb/gallon) as applied x usage (gallon/day). Total daily VOC emissions is the sum of VOC emissions from all coatings and/or solvents used and from the booth heater. [District Rule 2201] Federally Enforceable Through Title V Permit

27. Daily PM10 emissions of each coating shall be calculated as follows: daily PM10 emissions = coating density (lb/gallon) x coating solids content (%) x usage (gallons/day) x 0.0125. Total daily PM10 emissions is the sum of PM10 emissions from the booth heater and all coatings used. [District Rule 1070] Federally Enforceable Through Title V Permit

28. On a monthly basis, the permittee shall calculate and record the facility-wide PM10 emissions in pounds for the prior 12 calendar month period. The facility-wide PM10 emissions shall be calculated by summing the PM10 emissions from the previous 12 calendar months from every permitted unit at this facility. [District Rule 1070] Federally Enforceable Through Title V Permit

29. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4612] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

PERMIT NO: C-1080-12-0

ISSUANCE DATE: DRAFT

LEGAL OWNER OR OPERATOR: SCELZI ENTERPRISES INC
MAILING ADDRESS: 2286 E DATE AVE
FRESNO, CA 93706

LOCATION: 2772 S CHERRY AVE
FRESNO, CA 93706

EQUIPMENT DESCRIPTION:
MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATION WITH A PAINT SPRAY BOOTH WITH DRY EXHAUST FILTERS AND A 3.0 MMBTU/HR NATURAL GAS-FIRED BOOTH HEATER

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Authorities to Construct (ATCs) C-1080-1-4, -2-5, -4-2, -7-2, -9-2 and -10-2 shall be implemented concurrently with the modification and startup of the equipment authorized by this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
6. 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] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services
C-1080-12-0 : Sep 12 2017 11:29AM – GARCIAJ : Joint Inspection NOT Required

7. All coating, including application of primer, shall be conducted in the booth with filters in place, fan(s) operating, and doors closed. [District Rule 2201] Federally Enforceable Through Title V Permit

8. For all coating application, except truck bed liner coating application, only high-volume low-pressure (HVLP) spray equipment, electrostatic, brush, dip, or roll coating application equipment, or other application equipment approved by the District in writing, shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4612] Federally Enforceable Through Title V Permit

9. If an HVLP spray gun is used, the operator must demonstrate that the spray gun operates between 0.1 and 10 pounds per square inch, gauge, (psig) air atomizing pressure, measured dynamically at the center of the air cap and at the air horns. For a gun permanently labeled HVLP by the manufacturer, a satisfactory demonstration shall either be in the form of manufacturer's published technical information or by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer of the gun. For a gun not permanently labeled HVLP by the manufacturer, a satisfactory demonstration shall be based on manufacturer's published technical material and by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer of the gun. [District Rule 4612] Federally Enforceable Through Title V Permit

10. All fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners shall be stored in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4612] Federally Enforceable Through Title V Permit

11. No coatings, solvents, or additives containing any of the following compounds shall be used: lead compounds, hexavalent chromium, cadmium, and/or nickel compounds. [District Rule 4102 and 40 CFR 63, Subpart HHHHHH] Federally Enforceable Through Title V Permit

12. For solvent cleaning operations other than for bug and tar removal, the permittee shall not use solvents that have VOC content greater than 25 g/l (0.21 lb/gal) of cleaning material. [District Rule 4612] Federally Enforceable Through Title V Permit

13. For bug and tar removal, the permittee shall not use any material other than bug and tar remover regulated under the Consumer Products Regulation (California Code of Regulations Section 94507 et seq.). [District Rule 4612] Federally Enforceable Through Title V Permit

14. The VOC Regulatory content of coatings, as applied, shall not exceed any of the following limits: adhesion promoter 540 g/l (4.5 lb/gal), clear coating 250 g/l (2.1 lb/gal), color coating 420 g/l (3.5 lb/gal), multi-color coating 680 g/l (5.7 lb/gal), pretreatment coating 660 g/l (5.5 lb/gal), primer 250 g/l (2.1 lb/gal), primer sealer 250 g/l (2.1 lb/gal), single-stage coating 340 g/l (2.8 lb/gal), temporary protective coating 60 g/l (0.5 lb/gal), truck bed liner coating 310 g/l (2.6 lb/gal), underbody coating 430 g/l (3.6 lb/gal), uniform finish coating 540 g/l (4.5 lb/gal), and any other coating type 250 g/l (2.1 lb/gal). The VOC Regulatory content for coatings shall be defined as the VOC in grams per liter of coating (or pounds per gallon of coating), excluding water and exempt compounds. [District Rules 2201 and 4612] Federally Enforceable Through Title V Permit

15. Facility-wide VOC emissions shall not exceed 149.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit

16. The VOC emission rate from this unit shall not exceed either of the following limits: 40.0 lb/day or 10,400 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

17. Facility-wide PM10 emissions shall not exceed 29,199 pounds in any rolling 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit

18. The PM10 emission rate from this unit shall not exceed 3.2 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit

19. On a monthly basis, the permittee shall calculate and record the PM10 emissions in pounds from this unit for the prior calendar month. [District Rule 1070] Federally Enforceable Through Title V Permit

20. Permittee shall maintain daily records of quantity (gallons) and solids content of coatings applied. Permittee shall also maintain daily records of VOC content as applied (lb/gal) of each coating used, quantity (gallons) of each coating used, and calculated daily VOC emissions. [District Rule 1070] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

21. The permittee shall maintain records on a daily basis and have available at all times the following: a current list of all coatings used that includes the material name and manufacturer, application method, coating type and mix ratio specific to the coating, the VOC Actual for Coatings and VOC Regulatory for Coatings as applied, and the quantity of each type of coating used; current manufacturer specification sheets, material safety data sheets (MSDS), technical data sheets, or air quality data sheets, which list the VOC Actual for Coatings and VOC Regulatory for Coatings of each ready-to-spray coating and automotive coating components; and purchase records identifying the coating type, name, and volume of coatings bought. [District Rule 4612] Federally Enforceable Through Title V Permit

22. The permittee shall keep the following records for each solvent used for cleaning activities: the quantity of solvent used; a copy of the manufacturer's product data or material safety data sheet (MSDS); the solvent's name and manufacturer, the VOC content of the solvent in grams/liter or pounds/gallon, and the mix ratio and VOC content of the batch when the solvent is a mixture of different materials blended by the permittee. [District Rule 4612] Federally Enforceable Through Title V Permit

23. Daily VOC emissions of each coating and/or solvent shall be calculated as follows: daily VOC emissions = VOC content (lb/gallon) as applied x usage (gallon/day). Total daily VOC emissions is the sum of VOC emissions from all coatings and/or solvents used. [District Rule 2201] Federally Enforceable Through Title V Permit

24. Daily PM10 emissions of each coating shall be calculated as follows: daily PM10 emissions = coating density (lb/gallon) x coating solids content (%) x usage (gallons/day) x 0.0125 . Total daily PM10 emissions is the sum of PM10 emissions from the booth heater and all coatings used. [District Rule 1070] Federally Enforceable Through Title V Permit

25. On a monthly basis, the permittee shall calculate and record the facility-wide PM10 emissions in pounds for the prior 12 calendar month period. The facility-wide PM10 emissions shall be calculated by summing the PM10 emissions from the previous 12 calendar months from every permitted unit at this facility. [District Rule 1070] Federally Enforceable Through Title V Permit

26. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4612] Federally Enforceable Through Title V Permit

APPENDIX B
Quarterly Net Emissions Change (QNEC)

Quarterly Net Emissions Change (QNEC)

The Quarterly Net Emissions Change is used to complete the emission profile screen for the District's PAS database. The QNEC shall be calculated as follows:

$QNEC_{SLC}$ = $PE2_{SLC}$ - $PE1_{SLC}$, where:

$QNEC_{SLC}$ = Quarterly Net Emissions Change for units covered by the SLC.
$PE2_{SLC}$ = PE2 for all units covered by the SLC.
$PE1_{SLC}$ = PE1 for all units covered by the SLC.

Since the $PE2_{SLC}$ = $PE1_{SLC}$, the $QNEC_{SLC}$ for PM_{10} and VOC = 0 for all units. However, for the combustion equipment listed under unit -7 there is a decrease in emissions; therefore, the QNEC for unit -7 for NO_X, SO_X, and CO is calculated as follows:

QNEC = PE2 - PE1, where:

QNEC = Quarterly Net Emissions Change for each emissions unit, lb/qtr.
PE2 = Post Project Potential to Emit for each emissions unit, lb/qtr.
PE1 = Pre-Project Potential to Emit for each emissions unit, lb/qtr.

Using the values in Sections VII.C.2 and VII.C.1 in the evaluation above, quarterly PE2 and quarterly PE1 can be calculated as follows:

$PE2_{quarterly}$ = $PE2_{annual}$ ÷ 4 quarters/year

$PE1_{quarterly}$ = $PE1_{annual}$ ÷ 4 quarters/year

Quarterly NEC [QNEC] for Unit -7			
Pollutant	**PE2 (lb/qtr)**	**PE1 (lb/qtr)**	**QNEC (lb/qtr)**
NO_X	0	237	-237
SO_X	0	9	-9
CO	0	201	-201

For unit -11, the QNEC for NO_X, SO_X, and CO is calculated and summarized in the following table:

Quarterly NEC [QNEC]			
Pollutant	**PE2 (lb/qtr)**	**PE1 (lb/qtr)**	**QNEC (lb/qtr)**
NO_X	657	0	657
SO_X	18	0	18
CO	548	0	548

APPENDIX C
BACT Guideline

Best Available Control Technology (BACT) Guideline 4.2.1
Last Update: 3/23/2010

Automotive Spray Painting Operation, < 5.0 MMBtu/hr**

Pollutant	Achieved in Practice or in the SIP	Technologically Feasible	Alternate Basic Equipment
NOx	Natural gas or LPG-fired burner		
PM10	Spray Booth with Exhaust Filters; 95% control efficiency		Other compliant coating methods as stated in Rule 4612
VOC	District Rule 4612 compliant spray guns, coatings, cleaning materials, and solvents compliant with Rule 4612	VOC capture and control system	Other compliant coating methods as stated in Rule 4612

*** This Determination is also applicable to automotive spray painting operations without a heat source*

APPENDIX D
Top-Down BACT Analysis

Top-Down BACT Analysis

BACT Analysis for VOC Emissions for Units -11 and -12:

a. Step 1 - Identify All Possible Control Technologies

The SJVAPCD BACT Clearinghouse guideline 4.2.1, identifies achieved in practice and technologically feasible BACT control technologies for automotive spray painting operations, with or without a < 5.0 MMBtu/hr heater for VOC emissions as follows:

1) District Rule 4612 compliant spray guns, coatings compliant with Rule 4612 - achieved in practice
2) VOC capture and control system (incineration or carbon adsorption) - technologically feasible
3) Other compliant coating methods as stated in Rule 4612 – alternate basic equipment

b. Step 2 - Eliminate Technologically Infeasible Options

None of the above listed control technologies are technologically infeasible.

c. Step 3 - Rank Remaining Control Technologies by Control Effectiveness

1. VOC capture and control system: 95% control - technologically feasible
2. District Rule 4612 compliant guns: 75% transfer efficiency (minimum) - achieved in practice
3. Other application method per District Rule 4612: 65% transfer efficiency – alternate basic equipment

d. Step 4 - Cost Effectiveness Analysis - VOC Capture and Control Systems

Design Parameters for booth control technologies:

Exhaust Gas Flow Rate (Q): 24,460 cfm (worst case for unit -11, per manufacturer's data)
VOC (lb/year): 54,385 lb-VOC/year (worst case for both unit -11 and -12)

Thermal/Catalytic Incineration:

98% total control efficiency using a VOC capture and control system with thermal/catalytic incineration and 100% VOC capture.

(A). Emission Reduction:

Based on the above determined project emissions and assuming a VOC capture efficiency of 100% and incinerator destruction efficiency of 98%, the amount of VOC emissions reduced is calculated below.

VOC Emission Reductions = Annual PE_{VOC} × 1 tons/2,000 lb × Overall Control Eff.
= 54,385 lb/year × 1 tons/2,000 lb × 0.98
= **26.6 ton/year**

(B). Annual Natural Gas Cost:

It will be shown that the cost of the natural gas alone will be adequate to cause these technologies to be not cost effective per District BACT policy. This estimate does not include the capital cost of purchasing the oxidizer unit or any additional operational and maintenance costs. The increase in temperature of the contaminated air stream required by a catalytic incineration system is less than for a thermal incineration. Therefore, by demonstrating that the cost of the natural gas required by a catalytic incinerator would cause such a system to not be cost effective will also be sufficient to show that a thermal oxidation system would not be cost effective.

The cost of natural gas for this operation is calculated based on an operating schedule of 24 hr/day and 8,760 hr/year (525,600 min/year). A heat exchanger efficiency of 50% is assumed.

Natural Gas Usage = Flow Rate $\times$ Cp_{Air} $\times$ ΔT $\times$ HEF

Where: Flow Rate = Air flow through the incinerator (24,460 cfm)
Cp_{Air} = specific heat of air is 0.194 Btu/scf - °F
ΔT = increase in the temperature of the contaminated air stream required for catalytic oxidation to occur (It will be assumed that the air stream would increase in temperature from 77°F to 600°F.)
HEF = heat exchanger factor (0.5, assumed)

Natural Gas Usage = 24,460 cfm $\times$ 0.194 Btu/ scf - °F $\times$ (600 °F - 77 °F) $\times$ 0.5 $\times$ 525,600 min/year $\times$ MMBtu/10^6 Btu
= 652,207 MMBtu/year

Natural Gas Cost = 652,207 MMBtu/year $\times$ $7.41/MMBtu[7]
= **$4,832,851**

(C). Cost Effectiveness of a Catalytic Incinerator with 100% Capture:

Cost Effectiveness = Natural Gas Cost ($/year) ÷ Emission Reduction (ton-VOC/year)
= $4,832,851/year ÷ 26.6 ton-VOC/year
= **$181,686/ton-VOC**

The cost to operate a catalytic incinerator with 100% capture is $181,686/ton, which is greater than the District's VOC cost-effectiveness threshold of $17,500/ton. Therefore, this VOC control option is not cost effective and is being removed from consideration for this project.

[7] The natural gas price used is based on the average of the California industrial natural gas price over the last 12 months available (June 2016 through May 2017) as published by the U.S. Energy Information Administration in their latest monthly natural gas report. See http://tonto.eia.doe.gov/dnav/ng/hist/n3035ca3m.htm

Carbon Adsorption:

95% total control using a VOC capture and control system with carbon adsorption and 100% capture.

(A). Emission Reduction:

Based on the above determined emissions and assuming a VOC capture efficiency of 100% and carbon adsorption system control efficiency of 95%, the amount of VOC emissions reduced is calculated below.

VOC Emission Reductions = Annual PE_{VOC} × 1 tons/2,000 lb × Overall Control Eff.
= 54,385 lb/year × 1 tons/2,000 lb × 0.95
= **25.8 ton/year**

(B). Annual Carbon Replacement Costs:

Carbon adsorption occurs when air containing VOCs is blown through a carbon unit and the VOCs are adsorbed onto the surface of the cracks in the activated carbon particles. Two main areas of cost are the cost of the carbon adsorption unit itself and the annual operating cost of the unit. The primary annual operating cost is the replacement of the spent activated carbon. It will be shown that the annual cost to replace the spent activated carbon alone will be adequate to cause this technology to be not cost effective per District BACT policy. This estimate does not include the capital cost of purchasing the carbon adsorption unit or any additional operational and maintenance costs.

Since carbon can adsorb 20% of its weight in VOCs, and the control efficiency of carbon adsorption is 95%, the total amount of carbon required per year can be determined as follows:

Carbon Required = 54,385 lb-VOC/year x 0.95 x 1 lb-Carbon/0.2 lb-VOC
= 258,329 lb-Carbon/year

Per Travis Guyman of Air Filter USA (1-800-869-3557, August 15, 2016), the cost of carbon replacement for a paint spray booth is $2.00/lb for standard carbon. The annual cost of spent carbon replacement is estimated as follows:

Annual Carbon Replacement Cost = 258,329 lb-Carbon/year × $2/lb-Carbon
= $516,658/year

(C). Cost Effectiveness of a Carbon Adsorption System:

Cost Effectiveness = Annual Carbon Replacement Cost ($/year)
÷ Emission Reduction (ton-VOC/year)
= $516,658/year ÷ 25.8 ton-VOC/year
= **$20,025/ton-VOC**

The cost to operate a carbon adsorption system is $20,025/ton, which is greater than the District's VOC cost-effectiveness threshold of $17,500/ton. Therefore, this VOC control option is not cost effective and is being removed from consideration for this project.

Spray Guns and Coatings Compliant with District Rule 4612:

The applicant has proposed to use compliant spray guns and coatings compliant with District Rule 4612; therefore, a cost effectiveness analysis is not required for this control technology.

e. Step 5 - Select BACT

District Rule 4612 compliant spray guns and low VOC coatings and solvents in compliance with District Rule 4612 is selected as BACT for this category and class of source. The applicant has proposed to use spray guns and coatings in compliance with District Rule 4612; therefore, BACT for VOC is satisfied.

Top-Down BACT Analysis

BACT Analysis for PM_{10} Emissions for Units -11 and -12:

a. Step 1 - Identify all control technologies

The SJVUAPCD BACT Clearinghouse guideline 4.2.1 identifies achieved in practice BACT for automotive spray painting operations, <5.0 MMBtu/hr:

1. Spray Booth with Exhaust Filters; 95% control efficiency

No technologically feasible alternatives or control alternatives identified as alternate basic equipment for this class and category of source are listed.

b. Step 2 - Eliminate technologically infeasible options

There are no technologically infeasible options to eliminate from Step 1.

c. Step 3 - Rank remaining options by control effectiveness

No ranking needs to be done because only one control option is listed in Step 1.

d. Step 4 - Cost Effectiveness Analysis

The applicant has proposed the only control option listed for each pollutant. Therefore, a cost effectiveness analysis is not required.

e. Step 5 - Select BACT

BACT for PM_{10} is the use of a spray booth with exhaust filters and a 95% control efficiency. The facility is proposing to meet BACT by the use of a spray booth with exhaust filters and a 95% control efficiency therefore, BACT for PM_{10} is satisfied.

Top-Down BACT Analysis

BACT Analysis for NO_X Emissions for Unit -11:

a. Step 1 - Identify all control technologies

The SJVUAPCD BACT Clearinghouse guideline 4.2.1 identifies achieved in practice BACT for automotive spray painting operations, <5.0 MMBtu/hr:

1. Natural gas or LPG-fired burner

No technologically feasible alternatives or control alternatives identified as alternate basic equipment for this class and category of source are listed.

b. Step 2 - Eliminate technologically infeasible options

There are no technologically infeasible options to eliminate from Step 1.

c. Step 3 - Rank remaining options by control effectiveness

No ranking needs to be done because only one control option is listed in Step 1.

d. Step 4 - Cost Effectiveness Analysis

The applicant has proposed the only control option listed for each pollutant. Therefore, a cost effectiveness analysis is not required.

e. Step 5 - Select BACT

BACT for NOx is the use of a natural gas or LPG-fired burner. The facility is proposing to meet BACT by the use of a natural gas-fired burner. Therefore, BACT for NO_X is satisfied by the use of a natural gas or LPG-fired burner.

APPENDIX E
HRA/AAQA Summary

San Joaquin Valley Air Pollution Control District
Risk Management Review

To:	Jesse Garcia – Permit Services
From:	Jessica Rosas – Technical Services
Date:	August 21, 2017
Facility Name:	Scelzi Enterprises
Location:	2286 E. Date Ave, Fresno
Application #(s):	C-1080-1-4, 2-5, 4-2, 7-2 9-2, 10-2, 11-0 & 12-0
Project #:	C-1171970

A. RMR SUMMARY

RMR Summary						
Units	**Prioritization Score**	**Acute Hazard Index**	**Chronic Hazard Index**	**Maximum Individual Cancer Risk**	**T-BACT Required?**	**Special Permit Requirements?**
Unit 11-0 (Auto Coating Booth)	0.00	0.00	0.00	7.95E-11	No	Yes
Unit 12-0 (Auto Coating Booth)	84.8	0.00	0.37	0.00E00	No	Yes
Project Totals	84.8	0.00	0.37	7.95E-11		
Facility Totals	>1	0.00	0.88	7.95E-11		

Proposed Permit Requirements

To ensure that human health risks will not exceed District allowable levels; the following shall be included as requirements for:

To ensure that human health risks will not exceed District allowable levels and to comply with the Airborne Toxic Control Measure (ATCM) for Emissions of Hexavalent Chromium and Cadmium from Motor Vehicle and Mobile Equipment Coatings; the following permit conditions must be included for:

Unit # 11-0 &12-0

1. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction.
2. {Revised 4442} No coatings, solvents, or additives containing hexavalent chromium or cadmium shall be used. [District Rule 4102]
3. No coatings, solvents, or additives containing lead or nickel shall be used. [District Rule 4102]

B. RMR REPORT

I. Project Description

Technical Services received a request on August 15, 2017, to perform a Risk Management Review for a proposed installation of a coating operation served by a paint booth with a 3mmbtu/hr natural gas-fired booth heater (11-0) and one coating operation served by a paint booth with a permit exempt natural gas-fired booth heater (12-0). All other units at the facility are being modified solely to establish daily and/or annual limits. Since there is no increase in emissions and no change in stack parameters or other modeling parameters, no HRA is required, except for units 11-0 & 12-0.

II. Analysis

The SDS sheets for the coatings used in the operation were reviewed by CAS# for Toxic Air Contaminants (TACs). The values were entered into the coating spreadsheet to calculate the TAC's emissions, and input into the San Joaquin Valley APCD's Hazard Assessment and Reporting Program (SHARP). In accordance with the District's Risk Management Policy for Permitting New and Modified Sources (APR 1905, May 28, 2015), risks from the proposed unit's toxic emissions were prioritized using the procedure in the 1990 CAPCOA Facility Prioritization Guidelines. The prioritization score for this proposed facility was greater than 1.0 (see RMR Summary Table). Therefore, a refined health risk assessment was required. The AERMOD model was used, with the parameters outlined below and meteorological data for 2010-2014 from Fresno to determine the dispersion factors (i.e., the predicted concentration or X divided by the normalized source strength or Q) for a receptor grid. These dispersion factors were input into the SHARP Program, which then used the Air Dispersion Modeling and Risk Tool (ADMRT) of the Hot Spots Analysis and Reporting Program Version 2 (HARP 2) to calculate the chronic and acute hazard indices and the carcinogenic risk for the project.

The following parameters were used for the review:

Analysis Parameters Unit 11-0 (Coating Booth)			
Source Type	Point	**Location Type**	Rural
Stack Height (m)	7.32	**Closest Receptor (m)**	75
Stack Diameter. (m)	1.07	**Type of Receptor**	Business
Stack Exit Velocity (m/s)	12.92	**Max Hours per Year**	8760
Stack Exit Temp. (°K)	321	**Fuel Type**	N/A
VOC Emission (lb/hr)	6.21	**VOC Emission (lb/yr)**	34,320

Analysis Parameters Unit 11-0 (NG Heater)			
Source Type	Point	**Location Type**	Rural
Stack Height (m)	7.32	**Closest Receptor (m)**	75
Stack Diameter. (m)	1.07	**Type of Receptor**	Business
Stack Exit Velocity (m/s)	12.92	**Max Hours per Year**	8760
Stack Exit Temp. (°K)	321	**Fuel Type**	NG
Fuel Usage (mmscf/hr)	0.003	**Fuel Usage (mmscf/yr)**	1.095

Analysis Parameters Unit 12-0 (Coating Booth)			
Source Type	Point	**Location Type**	Rural
Stack Height (m)	7.32	**Closest Receptor (m)**	75
Stack Diameter. (m)	1.07	**Type of Receptor**	Business
Stack Exit Velocity (m/s)	10.56	**Max Hours per Year**	8760
Stack Exit Temp. (°K)	316	**Fuel Type**	N/A
VOC Emission (lb/hr)	1.67	**VOC Emission (lb/yr)**	10,400

Technical Services performed modeling for criteria pollutants CO, NO_x, SO_x, and PM10 with the emission rates below:

Unit #	NO_x (Lbs.)		SO_x (Lbs.)		CO (Lbs.)		PM_{10} (Lbs.)	
	Hr.	Yr.	Hr.	Yr.	Hr.	Yr.	Hr.	Yr.
11-0	0.3	2628	0.008	73	0.25	2190	0.225	1497
12-0	0	0	0	0	0	0	0.108	949

The results from the Criteria Pollutant Modeling are as follows:

Criteria Pollutant Modeling Results*

	Background Site	1 Hour	3 Hours	8 Hours	24 Hours	Annual
CO	Fresno-Drummond (2015)	Pass	X	Pass	X	X
NO_x	Fresno-Drummond (2015)	Pass[1]	X	X	X	Pass
SO_x	Fresno – Garland (2016)	Pass	Pass	X	Pass	Pass
PM_{10}	Clovis (2015)	X	X	X	Pass[2]	Pass[2]
$PM_{2.5}$	Clovis (2015)	X	X	X	Pass[3]	Pass[3]

*Results were taken from the attached PSD spreadsheet.
[1]The project was compared to the 1-hour NO2 National Ambient Air Quality Standard that became effective on April 12, 2010 using the District's approved procedures.
[2]The criteria pollutants are below EPA's level of significance as found in 40 CFR Part 51.165 (b)(2).
[3]The court has vacated EPA's $PM_{2.5}$ SILs. Until such time as new SIL values are approved, the District will use the corresponding PM_{10} SILs for both PM_{10} and $PM_{2.5}$ analyses.

III. Conclusion

The acute and chronic indices are below 1.0 and the cancer risk factor associated with the project is less than 1.0 in a million. **In accordance with the District's Risk Management Policy, the project is approved without Toxic Best Available Control Technology (T-BACT).**

To ensure that human health risks will not exceed District allowable levels; the permit requirements listed on page 1 of this report must be included for this proposed unit.

These conclusions are based on the data provided by the applicant and the project engineer. Therefore, this analysis is valid only as long as the proposed data and parameters do not change.

The emissions from the proposed equipment will not cause or contribute significantly to a violation of the State and National AAQS.

IV. Attachments

A. RMR request from the project engineer
B. Additional information from the applicant/project engineer
C. Convert
D. Prioritization score w/ toxic emissions summary
E. Facility Summary
F. AAQA Summary

APPENDIX F
Compliance Certification

San Joaquin Valley Air Pollution Control District

HEALTHY AIR LIVING

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

☐ ADMINISTRATIVE AMENDMENT ☒ MINOR MODIFICATION ☐ SIGNIFICANT MODIFICATION

COMPANY NAME: Scelzi Enterprises	FACILITY ID: C-1080
1. Type of Organization: ☒ Corporation ☐ Sole Ownership ☐ Government ☐ Partnership ☐ Utility	
2. Owner's Name: Michael & Gary Scelzi	
3. Agent to the Owner: Angel Topoozian	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial **applicable** circles for confirmation):

(AT) Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).

(AT) Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.

(AT) Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.

(AT) Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true, accurate, and complete.

(AT) For minor modifications, this application meets the criteria for use of minor permit modification procedures pursuant to District Rule 2520.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

Angel T
Signature of Responsible Official

7/19/17
Date

Angel Topoozian
Name of Responsible Official (please print)

Safety & Regulatory
Title of Responsible Official (please print)

APPENDIX G
Statewide Compliance Certification

SE
INC.

SCELZI ENTERPRISES, INC.

August 10, 2017

Regarding: Facility number #C-1080
Project C-1171970

To Whom It May Concern,

All stationary sources owned and operated by Scelzi Enterprises, Inc. are in compliance with all applicable emission limitations and standards.

Regards,

Mike Scelzi
Owner, Scelzi Enterprises, Inc.

2286 E. DATE AVE, FRESNO, CA 93706
BILLING ADDRESS: P.O. BOX 12066, FRESNO, CA. 93776
PHONE: (559) 237-5541 FAX: (559) 237-5554

APPENDIX H
Current Permits to Operate

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: C-1080-1-3 **EXPIRATION DATE:** 03/31/2018

EQUIPMENT DESCRIPTION:
MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATION WITH HVLP SPRAY GUN(S), A PAINT SPRAY BOOTH WITH DRY EXHAUST FILTERS, AN ENCLOSED SPRAY GUN CLEANER, AND A PERMIT EXEMPT NATURAL GAS DRYING BURNER < 20.0 MMBTU/DAY HEAT INPUT

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. VOC emissions from this facility shall not exceed 149 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
3. All priming shall be conducted inside this booth with filters in place, fan operating, and doors closed or curtains drawn. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The VOC Regulatory content of coatings, as applied shall not exceed any of the following limits: adhesion promoter 540 g/l (4.5 lb/gal), clear coating 250 g/l (2.1 lb/gal), color coating 420 g/l (3.5 lb/gal), multi-color coating 680 g/l (5.7 lb/gal), pretreatment coating 660 g/l (5.5 lb/gal), primer 250 g/l (2.1 lb/gal), primer sealer 250 g/l (2.1 lb/gal), single-stage coating 340 g/l (2.8 lb/gal), temporary protective coating 60 g/l (0.5 lb/gal), underbody coating 430 g/l (3.6 lb/gal), uniform finish coating 540 g/l (4.5 lb/gal), and any other coating type 250 g/l (2.1 lb/gal). The VOC Regulatory content for coatings shall be defined as the VOC in grams per liter of coating (or pounds per gallon of coating), excluding water and exempt compounds. [District Rules 2201 and 4612] Federally Enforceable Through Title V Permit
5. Only high-volume low-pressure (HVLP) spray equipment, electrostatic, brush, dip, or roll coating application equipment, or other application equipment approved by the District in writing, shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4612] Federally Enforceable Through Title V Permit
6. If an HVLP spray gun is used, the operator must demonstrate that the spray gun operates between 0.1 and 10 pounds per square inch, gauge, (psig) air atomizing pressure, measured dynamically at the center of the air cap and at the air horns. For a gun permanently labeled HVLP by the manufacturer, a satisfactory demonstration shall either be in the form of manufacturer's published technical information or by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer of the gun. For a gun not permanently labeled HVLP by the manufacturer, a satisfactory demonstration shall be based on manufacturer's published technical material and by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer of the gun. [District Rule 4612] Federally Enforceable Through Title V Permit
7. For solvent cleaning operations other than for bug and tar removal, the permittee shall not use solvents that have VOC content greater than 25 g/l (0.21 lb/gal) of cleaning material. [District Rule 4612] Federally Enforceable Through Title V Permit
8. For bug and tar removal, the permittee shall not use any material other than bug and tar remover regulated under the Consumer Products Regulation (California Code of Regulations Section 94507 et seq.). [District Rule 4612] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

9. All fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners shall be stored in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4612] Federally Enforceable Through Title V Permit

10. The permittee shall maintain and have available at all times the following: a current list of all coatings used that includes the material name and manufacturer, application method, coating type and mix ratio specific to the coating, and the VOC Actual for Coatings and VOC Regulatory for Coatings as applied; current manufacturer specification sheets, material safety data sheets (MSDS), technical data sheets, or air quality data sheets, which list the VOC Actual for Coatings and VOC Regulatory for Coatings of each ready-to-spray coating and automotive coating components; and purchase records identifying the coating type, name, and volume of coatings bought. [District Rule 4612] Federally Enforceable Through Title V Permit

11. The permittee shall keep the following records for each solvent used for cleaning activities: the quantity of solvent used; a copy of the manufacturer's product data or material safety data sheet (MSDS); the solvent's name and manufacturer, the VOC content of the solvent in grams/liter or pounds/gallon, and the mix ratio and VOC content of the batch when the solvent is a mixture of different materials blended by the permittee. [District Rule 4612] Federally Enforceable Through Title V Permit

12. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4612] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: C-1080-2-4 **EXPIRATION DATE:** 03/31/2018

EQUIPMENT DESCRIPTION:
MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATION AND TRUCK BED LINER COATING OPERATION WITH HVLP SPRAY GUN(S), PLURAL COMPONENT APPLICATORS, A PAINT SPRAY BOOTH WITH DRY EXHAUST FILTERS AND A PERMIT EXEMPT NATURAL GAS DRYING BURNER < 20.0 MMBTU/DAY HEAT INPUT

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
3. All filters shall be properly maintained and must be in place during the painting operation. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Coatings may not be applied outside of the paint booth. [District Rule 2201] Federally Enforceable Through Title V Permit
5. No coatings, solvents, or additives containing any of the following compounds shall be used: chromium, lead or nickel. [District Rule 4102] Federally Enforceable Through Title V Permit
6. The VOC emission rate from the truck bed liner coating operation shall not exceed 0.7 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The total VOC emission rate from this unit shall not exceed 50.0 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The particulate matter emission rate from the truck bed liner coating operation shall not exceed 3.0 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The total particulate matter (PM10) emission rate from this unit shall not exceed 14.5 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. VOC emissions from this facility shall not exceed 149 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The VOC Regulatory content of coatings, as applied, shall not exceed any of the following limits: adhesion promoter 540 g/l (4.5 lb/gal), clear coating 250 g/l (2.1 lb/gal), color coating 420 g/l (3.5 lb/gal), multi-color coating 680 g/l (5.7 lb/gal), pretreatment coating 660 g/l (5.5 lb/gal), primer 250 g/l (2.1 lb/gal), primer sealer 250 g/l (2.1 lb/gal), single-stage coating 340 g/l (2.8 lb/gal), temporary protective coating 60 g/l (0.5 lb/gal), underbody coating 430 g/l (3.6 lb/gal), uniform finish coating 540 g/l (4.5 lb/gal), and any other coating type 250 g/l (2.1 lb/gal). The VOC Regulatory content for coatings shall be defined as the VOC in grams per liter of coating (or pounds per gallon of coating), excluding water and exempt compounds. [District Rules 2201 and 4612] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

12. For all coating application, except truck bed liner coating application, only high-volume low-pressure (HVLP) spray equipment, electrostatic, brush, dip, or roll coating application equipment, or other application equipment approved by the District in writing, shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4612] Federally Enforceable Through Title V Permit

13. If an HVLP spray gun is used, the operator must demonstrate that the spray gun operates between 0.1 and 10 pounds per square inch, gauge, (psig) air atomizing pressure, measured dynamically at the center of the air cap and at the air horns. For a gun permanently labeled HVLP by the manufacturer, a satisfactory demonstration shall either be in the form of manufacturer's published technical information or by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer of the gun. For a gun not permanently labeled HVLP by the manufacturer, a satisfactory demonstration shall be based on manufacturer's published technical material and by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer of the gun. [District Rule 4612] Federally Enforceable Through Title V Permit

14. For solvent cleaning operations other than for bug and tar removal, the permittee shall not use solvents that have VOC content greater than 25 g/l (0.21 lb/gal) of cleaning material. [District Rule 4612] Federally Enforceable Through Title V Permit

15. For bug and tar removal, the permittee shall not use any material other than bug and tar remover regulated under the Consumer Products Regulation (California Code of Regulations Section 94507 et seq.). [District Rule 4612] Federally Enforceable Through Title V Permit

16. All fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners shall be stored in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4612] Federally Enforceable Through Title V Permit

17. The permittee shall maintain and have available at all times the following: a current list of all coatings used that includes the material name and manufacturer, application method, coating type and mix ratio specific to the coating, and the VOC Actual for Coatings and VOC Regulatory for Coatings as applied; current manufacturer specification sheets, material safety data sheets (MSDS), technical data sheets, or air quality data sheets, which list the VOC Actual for Coatings and VOC Regulatory for Coatings of each ready-to-spray coating and automotive coating components; and purchase records identifying the coating type, name, and volume of coatings bought. [District Rule 4612] Federally Enforceable Through Title V Permit

18. The permittee shall keep the following records for each solvent used for cleaning activities: the quantity of solvent used; a copy of the manufacturer's product data or material safety data sheet (MSDS); the solvent's name and manufacturer, the VOC content of the solvent in grams/liter or pounds/gallon, and the mix ratio and VOC content of the batch when the solvent is a mixture of different materials blended by the permittee. [District Rule 4612] Federally Enforceable Through Title V Permit

19. The permittee shall keep daily records of the amount of each coating and solvent used. [District Rule 2201] Federally Enforceable Through Title V Permit

20. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4612] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: C-1080-4-1 **EXPIRATION DATE:** 03/31/2018

EQUIPMENT DESCRIPTION:
MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATION WITH HVLP SPRAY GUNS, A PAINT SPRAY BOOTH WITH DRY EXHAUST FILTERS, AN ENCLOSED SPRAY GUN CLEANER, A PERMIT EXEMPT NATURAL GAS DRYING BURNER < 20.0 MMBTU/DAY HEAT INPUT, AND AN ATTACHED DRYING ROOM WITH A PERMIT EXEMPT NATURAL GAS DRYING BURNER < 20.0 MMBTU/DAY HEAT INPUT

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
2. VOC emissions from this facility shall not exceed 149 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
3. All filters shall be properly maintained and must be in place during the painting operation. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Coatings may not be applied outside of the paint booth. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The VOC Regulatory content of coatings, as applied shall not exceed any of the following limits: adhesion promoter 540 g/l (4.5 lb/gal), clear coating 250 g/l (2.1 lb/gal), color coating 420 g/l (3.5 lb/gal), multi-color coating 680 g/l (5.7 lb/gal), pretreatment coating 660 g/l (5.5 lb/gal), primer 250 g/l (2.1 lb/gal), primer sealer 250 g/l (2.1 lb/gal), single-stage coating 340 g/l (2.8 lb/gal), temporary protective coating 60 g/l (0.5 lb/gal), underbody coating 430 g/l (3.6 lb/gal), uniform finish coating 540 g/l (4.5 lb/gal), and any other coating type 250 g/l (2.1 lb/gal). The VOC Regulatory content for coatings shall be defined as the VOC in grams per liter of coating (or pounds per gallon of coating), excluding water and exempt compounds. [District Rules 2201 and 4612] Federally Enforceable Through Title V Permit
6. Only high-volume low-pressure (HVLP) spray equipment, electrostatic, brush, dip, or roll coating application equipment, or other application equipment approved by the District in writing, shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4612] Federally Enforceable Through Title V Permit
7. If an HVLP spray gun is used, the operator must demonstrate that the spray gun operates between 0.1 and 10 pounds per square inch, gauge, (psig) air atomizing pressure, measured dynamically at the center of the air cap and at the air horns. For a gun permanently labeled HVLP by the manufacturer, a satisfactory demonstration shall either be in the form of manufacturer's published technical information or by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer of the gun. For a gun not permanently labeled HVLP by the manufacturer, a satisfactory demonstration shall be based on manufacturer's published technical material and by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer of the gun. [District Rule 4612] Federally Enforceable Through Title V Permit
8. For solvent cleaning operations other than for bug and tar removal, the permittee shall not use solvents that have VOC content greater than 25 g/l (0.21 lb/gal) of cleaning material. [District Rule 4612] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

9. For bug and tar removal, the permittee shall not use any material other than bug and tar remover regulated under the Consumer Products Regulation (California Code of Regulations Section 94507 et seq.). [District Rule 4612] Federally Enforceable Through Title V Permit

10. All fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners shall be stored in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4612] Federally Enforceable Through Title V Permit

11. The permittee shall maintain and have available at all times the following: a current list of all coatings used that includes the material name and manufacturer, application method, coating type and mix ratio specific to the coating, and the VOC Actual for Coatings and VOC Regulatory for Coatings as applied; current manufacturer specification sheets, material safety data sheets (MSDS), technical data sheets, or air quality data sheets, which list the VOC Actual for Coatings and VOC Regulatory for Coatings of each ready-to-spray coating and automotive coating components; and purchase records identifying the coating type, name, and volume of coatings bought. [District Rule 4612] Federally Enforceable Through Title V Permit

12. The permittee shall keep the following records for each solvent used for cleaning activities: the quantity of solvent used; a copy of the manufacturer's product data or material safety data sheet (MSDS); the solvent's name and manufacturer, the VOC content of the solvent in grams/liter or pounds/gallon, and the mix ratio and VOC content of the batch when the solvent is a mixture of different materials blended by the permittee. [District Rule 4612] Federally Enforceable Through Title V Permit

13. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4612] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: C-1080-7-1 **EXPIRATION DATE:** 03/31/2018

EQUIPMENT DESCRIPTION:
MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATION WITH HVLP SPRAY GUN(S), A PAINT SPRAY BOOTH WITH DRY EXHAUST FILTERS, AN ATTACHED DRYING BOOTH WITH A 1.075 MMBTU/HR NATURAL GAS-FIRED DRYING BURNER AND AN ENCLOSED SPRAY GUN CLEANER

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
4. All painting, including application of primer, shall be conducted inside the booth with filters in place, fan(s) operating, and doors closed. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The VOC Regulatory content of coatings, as applied shall not exceed any of the following limits: adhesion promoter 540 g/l (4.5 lb/gal), clear coating 250 g/l (2.1 lb/gal), color coating 420 g/l (3.5 lb/gal), multi-color coating 680 g/l (5.7 lb/gal), pretreatment coating 660 g/l (5.5 lb/gal), primer 250 g/l (2.1 lb/gal), primer sealer 250 g/l (2.1 lb/gal), single-stage coating 340 g/l (2.8 lb/gal), temporary protective coating 60 g/l (0.5 lb/gal), underbody coating 430 g/l (3.6 lb/gal), uniform finish coating 540 g/l (4.5 lb/gal), and any other coating type 250 g/l (2.1 lb/gal). The VOC Regulatory content for coatings shall be defined as the VOC in grams per liter of coating (or pounds per gallon of coating), excluding water and exempt compounds. [District Rules 2201 and 4612] Federally Enforceable Through Title V Permit
6. Only high-volume low-pressure (HVLP) spray equipment, electrostatic, brush, dip, or roll coating application equipment, or other application equipment approved by the District in writing, shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4612] Federally Enforceable Through Title V Permit
7. If an HVLP spray gun is used, the operator must demonstrate that the spray gun operates between 0.1 and 10 pounds per square inch, gauge, (psig) air atomizing pressure, measured dynamically at the center of the air cap and at the air horns. For a gun permanently labeled HVLP by the manufacturer, a satisfactory demonstration shall either be in the form of manufacturer's published technical information or by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer of the gun. For a gun not permanently labeled HVLP by the manufacturer, a satisfactory demonstration shall be based on manufacturer's published technical material and by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer of the gun. [District Rule 4612] Federally Enforceable Through Title V Permit
8. For solvent cleaning operations other than for bug and tar removal, the permittee shall not use solvents that have VOC content greater than 25 g/l (0.21 lb/gal) of cleaning material. [District Rule 4612] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

9. For bug and tar removal, the permittee shall not use any material other than bug and tar remover regulated under the Consumer Products Regulation (California Code of Regulations Section 94507 et seq.). [District Rule 4612] Federally Enforceable Through Title V Permit
10. All fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners shall be stored in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4612] Federally Enforceable Through Title V Permit
11. The permittee shall maintain and have available at all times the following: a current list of all coatings used that includes the material name and manufacturer, application method, coating type and mix ratio specific to the coating, and the VOC Actual for Coatings and VOC Regulatory for Coatings as applied; current manufacturer specification sheets, material safety data sheets (MSDS), technical data sheets, or air quality data sheets, which list the VOC Actual for Coatings and VOC Regulatory for Coatings of each ready-to-spray coating and automotive coating components; and purchase records identifying the coating type, name, and volume of coatings bought. [District Rule 4612] Federally Enforceable Through Title V Permit
12. The permittee shall keep the following records for each solvent used for cleaning activities: the quantity of solvent used; a copy of the manufacturer's product data or material safety data sheet (MSDS); the solvent's name and manufacturer, the VOC content of the solvent in grams/liter or pounds/gallon, and the mix ratio and VOC content of the batch when the solvent is a mixture of different materials blended by the permittee. [District Rule 4612] Federally Enforceable Through Title V Permit
13. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4612] Federally Enforceable Through Title V Permit
14. The particulate matter (PM10) emission rate shall not exceed 23.3 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The VOC emission rate from this unit shall not exceed 99.0 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
16. VOC emissions from this facility shall not exceed 149 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Emissions from the burner shall not exceed any of the following limits: 0.10 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.084 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Only PUC quality natural gas, or LPG shall be used as fuel. [Rule 2201] Federally Enforceable Through Title V Permit
19. No coatings, solvents, or additives containing nickel compounds shall be used. [District Rule 4102]
20. No coatings, solvents, or additives containing lead compounds shall be used. [District Rule 4102]
21. No coatings, solvents, or additives containing chromium compounds shall be used. [District Rule 4102]

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: C-1080-9-1 **EXPIRATION DATE:** 03/31/2018

EQUIPMENT DESCRIPTION:
MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATION (UNDERCOATING OPERATION) WITH AIRLESS SPRAY GUN(S) AND AN ENCLOSED SPRAY GUN CLEANER

PERMIT UNIT REQUIREMENTS

1. The VOC Regulatory content of coatings, as applied, shall not exceed any of the following limits: adhesion promoter 540 g/l (4.5 lb/gal), clear coating 250 g/l (2.1 lb/gal), color coating 420 g/l (3.5 lb/gal), multi-color coating 680 g/l (5.7 lb/gal), pretreatment coating 660 g/l (5.5 lb/gal), primer 250 g/l (2.1 lb/gal), primer sealer 250 g/l (2.1 lb/gal), single-stage coating 340 g/l (2.8 lb/gal), temporary protective coating 60 g/l (0.5 lb/gal), underbody coating 430 g/l (3.6 lb/gal), uniform finish coating 540 g/l (4.5 lb/gal), and any other coating type 250 g/l (2.1 lb/gal). The VOC Regulatory content for coatings shall be defined as the VOC in grams per liter of coating (or pounds per gallon of coating), excluding water and exempt compounds. [District Rule 4612] Federally Enforceable Through Title V Permit
2. For solvent cleaning operations other than for bug and tar removal, the permittee shall not use solvents that have VOC content greater than 25 g/l (0.21 lb/gal) of cleaning material. [District Rule 4612] Federally Enforceable Through Title V Permit
3. For bug and tar removal, the permittee shall not use any material other than bug and tar remover regulated under the Consumer Products Regulation (California Code of Regulations Section 94507 et seq.). [District Rule 4612] Federally Enforceable Through Title V Permit
4. All fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners shall be stored in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4612] Federally Enforceable Through Title V Permit
5. The permittee shall maintain and have available at all times the following: a current list of all coatings used that includes the material name and manufacturer, application method, coating type and mix ratio specific to the coating, and the VOC Actual for Coatings and VOC Regulatory for Coatings as applied; current manufacturer specification sheets, material safety data sheets (MSDS), technical data sheets, or air quality data sheets, which list the VOC Actual for Coatings and VOC Regulatory for Coatings of each ready-to-spray coating and automotive coating components; and purchase records identifying the coating type, name, and volume of coatings bought. [District Rule 4612] Federally Enforceable Through Title V Permit
6. The permittee shall keep the following records for each solvent used for cleaning activities: the quantity of solvent used; a copy of the manufacturer's product data or material safety data sheet (MSDS); the solvent's name and manufacturer, the VOC content of the solvent in grams/liter or pounds/gallon, and the mix ratio and VOC content of the batch when the solvent is a mixture of different materials blended by the permittee. [District Rule 4612] Federally Enforceable Through Title V Permit
7. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4612] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: C-1080-10-1 **EXPIRATION DATE:** 03/31/2018

EQUIPMENT DESCRIPTION:
METAL CUTTING OPERATION CONSISTING OF ONE 40 KVA CINCINNATI MODEL CL-440 LASER CUTTER SERVED BY AN AIRGUARD MODEL MICRO GUARD 99 DUST COLLECTOR

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Visible emissions from the exhaust of the dust collector serving the laser cutter 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] Federally Enforceable Through Title V Permit
3. The dust collector shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The dust collector cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Material removed from the dust collector shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The dust collector shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
7. A spare set of filters shall be maintained on the premises at all times. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The laser cutting operation shall only cut mild steel and galvanized steel. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The maximum PM10 emission rate from the laser cutting operation is 0.013 lb per day based on 24 hours of operation [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
10. The dust collector shall operate at all times with a minimum differential pressure of 0 inches of water column and a maximum differential pressure of 6.5 inches water column. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The dust collector shall achieve a minimum PM10 control efficiency of 99.97%. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
12. Differential operating pressure shall be monitored and recorded on each day that the dust collector operates. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The operator shall record the date and type of metal cut whenever the laser is used. [District Rule 1070] Federally Enforceable Through Title V Permit
14. Records of all maintenance of the dust collector, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

15. Records required by this permit shall be retained on-site for at least five years and shall be made readily available for District inspection on request. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

APPENDIX I
Emission Inventory for 2015 and 2016

Facility Totals

CAS	*Pollutant Name*	*Emissions*			
42101	Carbon Monoxide	3.00E-02	TONS-YR	4.52E-05	TONS-HR
42603	Oxides of Nitrogen	3.57E-02	TONS-YR	5.37E-05	TONS-HR
85101	Particulate Matter 10	2.71E-03	TONS-YR	4.08E-06	TONS-HR
16113	Reactive Organic Gas	1.49E+01	TONS-YR	7.40E-03	TONS-HR
42401	Sulfur Dioxide	1.02E-03	TONS-YR	1.53E-06	TONS-HR
75070	Acetaldehyde	3.07E-03	LB-YR	4.62E-06	LB-HR
107028	Acrolein	1.93E-03	LB-YR	2.90E-06	LB-HR
71432	Benzene	5.71E-03	LB-YR	8.60E-06	LB-HR
100414	Ethyl benzene	6.78E-03	LB-YR	1.02E-05	LB-HR
50000	Formaldehyde	1.21E-02	LB-YR	1.83E-05	LB-HR
110543	Hexane	4.49E-03	LB-YR	6.77E-06	LB-HR
91203	Naphthalene	2.14E-04	LB-YR	3.23E-07	LB-HR
1151	PAHs, total, w/o individ. components reported	2.85E-04	LB-YR	4.30E-07	LB-HR
115071	Propylene	5.21E-01	LB-YR	7.86E-04	LB-HR
108883	Toluene	2.61E-02	LB-YR	3.93E-05	LB-HR
1330207	Xylenes (mixed)	1.94E-02	LB-YR	2.92E-05	LB-HR

MT = Metric Ton = 2,204.6 pounds

All Coatings - **C-1080 - 7-1** - Scelzi Enterperises

Usage	VOC lb/gal	Total Emissions			
0.17	3.49	0.59			
0.12	2.8	0.34			
19.15	1.86	35.62			
21.08	3.18	67.03			
0.11	5.34	0.59			
23.63	2.1	49.62			
940.26	0.5	470.13			
286.32	0.5	143.16			
109.75	3.35	367.66			
1054.3	1.46	1539.28			
117.48	3	352.44			
0	0.5	0.00			
2418.92	2.8	6772.98			
9.24	2.04	18.85			
Total Gals		**Total VOC**			
5000.53		**9818.29**	Totals	**Tons**	**4.91**
	1.9634		Avg VOC		

Solvent

1.98	0	**0.00**	**Tons**	**0.0000**

All Coatings - **C-1080 - 9-1** - Scelzi Enterperises

4384.34	0.4	1753.74	**Tons**	**0.877**

Totals Facility 14.91

All Coatings - **C-1080 - 1-3** - Scelzi Enterperises

Usage	VOC lb/gal	Total Emissions
0.17	3.49	0.59
0.12	2.8	0.34
24.78	1.86	46.09
35.21	3.18	111.97
0.1	5.34	0.53
24.57	2.1	51.60
736.87	0.5	368.44
290	0.5	145.00
0	3.35	0.00
883.63	1.46	1290.10
119.43	3	358.29
0	0.5	0.00
1743.27	2.8	4881.16
12	2.1	25.20
9.24	2.04	18.85

Total Gals		**Total VOC**			
3879.39		**7298.15**	Totals	**Tons**	**3.65**
	1.8813		Avg VOC		

Solvent

1.89	0	**0.00**	**Tons**	**0.0000**

All Coatings - C-1080 - 2-3 - Scelzi Enterperises

1466.56	0	0.00	**Tons**	**0.0000**

All Coatings - **C-1080 - 4-1** - Scelzi Enterperises

Usage	VOC lb/gal	Total Emissions
0.17	3.49	0.59
0.12	2.8	0.34
19.15	1.86	35.62
21.06	3.18	66.97
0.11	5.34	0.59
23.63	2.1	49.62
1071.28	0.5	535.64
284.94	0.5	142.47
0	3.35	0.00
1316.36	1.46	1921.89
1087.93	3	3263.79
0	0.5	0.00
1745.56	2.8	4887.57
14	2.1	29.40
9.24	2.04	18.85

Total Gals		**Total VOC**			
5593.55		**10953.33**	Totals	**Tons**	**5.48**
	1.958		Avg VOC		

Solvent

1.98	0	**0.00**	**Tons**	**0.0000**

Emission Statement - Calendar Year 2016 Emissions

Date / Time Printed 03/06/2017 / 1:17:15 PM

UTM Zone: 11
UTM East: 251.485
UTM North: 4065.28

Please Sign and Return to:
San Joaquin Valley APCD
1990 E. Gettysburg Ave.
Fresno, CA 93726

Facility ID # C - 1080
TAD # 10 - 1080
SIC # 7532
Facility Name SCELZI ENTERPRISES INC
TOXID #
Planning Inventory 3170

CHECK BOX IF PROCESS RATES ARE CONFIDENTIAL : N

Device ID #	Process Number	Equipment Type	Yearly Process Rate	Units / Source Classification Code	NOX Lb / Unit	VOC Lb / Unit	SOX Lb / Unit	CO Lb / Unit	PM10 Lb / Unit	NH3* Lb / Unit	Note: NH3 emissions are in lbs / yr
1	1	TOTAL COATINGS EXCEPT SOLVENTS	2463	GALLONS COATING	.0	1.88	.0	.0	.0	.0	
				40200110	**.0**	**2.32**	**.0**	**.0**	**.0**	**.0**	**(Tons/Yr)**
1	2	SOLVENTS SIMPLE GREEN & NAKED GUN	0	GALLONS	.0	.0	.0	.0	.0	.0	
				40200998	**.0**	**.0**	**.0**	**.0**	**.0**	**.0**	**(Tons/Yr)**
2	1	COATINGS	3751	GALLONS COATING	.0	.0	.0	.0	.0	.0	
				40200110	**.0**	**.0**	**.0**	**.0**	**.0**	**.0**	**(Tons/Yr)**
4	1	TOTAL COATINGS EXCEPT SOLVENTS	7024	GALLONS COATING	.0	1.96	.0	.0	.0	.0	
				40200110	**.0**	**6.88**	**.0**	**.0**	**.0**	**.0**	**(Tons/Yr)**
4	2	SOLVENTS SIMPLE GREEN & NAKED GUN	0	GALLONS	.0	1.96	.0	.0	.0	.0	
				40200998	**.0**	**.0**	**.0**	**.0**	**.0**	**.0**	**(Tons/Yr)**
7	1	TOTAL COATINGS EXCEPT SOLVENTS	4570	GALLONS COATING	.0	1.96	.0	.0	.0	.0	
				40200110	**.0**	**4.49**	**.0**	**.0**	**.0**	**.0**	**(Tons/Yr)**
7	2	SOLVENTS SIMPLE GREEN & NAKED GUN	0	GALLONS	.0	.02	.0	.0	.0	.0	
				40200998	**.0**	**.0**	**.0**	**.0**	**.0**	**.0**	**(Tons/Yr)**
7	3	1.075 MMBTU/HR DRYING BURNER - NG	0.72	MILLION CUBIC FEET BURNED	100.0	5.5	2.85	84.0	7.6	.0	
				10300603	**.04**	**.0**	**.0**	**.03**	**.0**	**.0**	**(Tons/Yr)**
9	1	TOTAL COATINGS EXCEPT SOLVENTS	152.3	GALLONS COATING	.0	.4	.0	.0	.0	.0	
				40200110	**.0**	**.03**	**.0**	**.0**	**.0**	**.0**	**(Tons/Yr)**
9	2	SOLVENT - SIMPLE GREEN	0	GALLONS	.0	.02	.0	.0	.0	.0	
				40200998	**.0**	**.0**	**.0**	**.0**	**.0**	**.0**	**(Tons/Yr)**