



JUN 0 4 2018

Mr. Steve Campbell **CBC Steel Buildings LLC** 1700 E Louise Ave Lathrop, CA 95330

Re: Notice of Preliminary Decision – Title V Permit Renewal

Facility Number: N-222 Project Number: N-1170080

Dear Mr. Campbell:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for CBC Steel Buildings LLC at 1700 E Louise Ave in Lathrop, California.

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

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Errol Villegas, Permit Services Manager, at (559) 230-5900.

Sincerely,

Arnaud Marjollet

Director of Permit Services

Enclosures

Tung Le, CARB (w/enclosure) via email CC:

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

Ben Scroggins, CBC Steel Buildings (w/enclosure) via email CC:

Seved Sadredin

Executive Director/Air Pollution Control Officer

SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT

Proposed Title V Permit Renewal Evaluation CBC Steel Buildings LLC N-222

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TITLE V PERMIT RENEWAL EVALUATION

Metal Fabrication

Engineer: Edozie Onumonu

Date: May 21, 2018

Facility Number: N-222

Facility Name: CBC Steel Buildings LLC

Mailing Address: 1700 E Louise Ave

Lathrop, CA 95330

Contact Name: Steven G. Campbell

Phone: (209) 557-6400

Responsible Official: Benjamin Scroggins

Title: Environmental Coordinator

Project #: N-1170080

Deemed Complete: January 31, 2017

I. PROPOSAL

CBC Steel Buildings LLC (CBC Steel) was issued a Title V permit on September 30, 2012. As required by District Rule 2520, the applicant is requesting a permit renewal. The existing Title V permit shall be reviewed and modified to reflect all applicable District and federal rules updated, removed, or added since the issuance of the initial Title V permit.

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

II. FACILITY LOCATION

CBC Steel is located at 1700 E Louise Ave in Lathrop, CA.

III. EQUIPMENT LISTING

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

IV. GENERAL PERMIT TEMPLATE USAGE

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

A. Template SJV-UM-0-3 Facility Wide Umbrella

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

V. SCOPE OF EPA AND PUBLIC REVIEW

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

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

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

Conditions 1 through 38 of the requirements for permit unit N-222-0-2

VI. FEDERALLY ENFORCEABLE REQUIREMENTS

A. Rules Updated or Evaluated

- District Rule 2020, <u>Exemptions</u>
 (amended December 20, 2007 ⇒ amended December 18, 2014)
- District Rule 2201, New and Modified Stationary Source Review Rule (amended December 18, 2008 ⇒ amended February 18, 2016)
- District Rule 2520, <u>Federally Mandated Operating Permit</u> (amended June 21, 2001)
- 40 CFR Part 64, <u>Compliance Assurance Monitoring</u> (amended October 10, 1997)
- 40 CFR Part 82, Subpart B, <u>Servicing of Motor Vehicle Air Conditioners</u> (amended June 18, 2008 ⇒ amended June 25, 2013)
- 40 CFR Part 82, Subpart F, <u>Recycling and Emissions Reduction</u> (amended June 18, 2008 ⇒ amended December 27, 2017)

B. Rules Removed

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

C. Rules Added

• District Rule 2410, <u>Prevention of Significant Deterioration</u> (Adopted June 16, 2011)

D. Rules Not Updated

- District Rule 1070, <u>Inspections</u> (amended December 17, 1992)
- District Rule 1100, Equipment Breakdown (amended December 17,1992)
- District Rule 1160, Emission Statements (amended December 17,1992)
- District Rule 2010, Permits Required (amended December 17, 1992)
- District Rule 2031, Transfer of Permits (amended December 17, 1992)
- District Rule 2040, <u>Applications</u> (amended December 17, 1992)

- District Rule 4101, <u>Visible Emissions</u> (amended February 17, 2005)
- District Rule 4102, Nuisance (amended December 17, 1992)
- District Rule 4603, <u>Surface Coating Of Metal Parts And Products</u>, <u>Plastic Parts And Products</u>, <u>And Pleasure Crafts</u> (amended September 17, 2009)
- District Rule 8011, <u>Fugitive Dust General Requirements</u> (amended August 19, 2004)
- District Rule 8021, <u>Fugitive Dust Requirements for Control of Fine Particulate Matter (PM10) from Construction</u>, <u>Demolition</u>, <u>Excavation</u>, and <u>Extraction Activities</u> (amended August 19, 2004)
- District Rule 8031, <u>Fugitive Dust Requirements for Control of Fine Particulate Matter (PM10) from Handling and Storage of Bulk Materials</u> (amended August 19, 2004)
- District Rule 8041, <u>Fugitive Dust Requirements for Control of Fine Particulate Matter (PM10) from Carryout and Trackout</u> (amended August 19, 2004)
- District Rule 8051, <u>Fugitive Dust Requirements for Control of Fine Particulate Matter (PM10) from Open Area</u> (amended August 19, 2004)
- District Rule 8061, <u>Fugitive Dust Requirements for Control of Fine Particulate Matter (PM10) from Paved and Unpaved Roads</u> (amended August 19, 2004)
- District Rule 8071, <u>Fugitive Dust Requirements for Control of Fine Particulate Matter (PM10) from Unpaved Vehicle/Equipment Areas</u> (amended September 16, 2004)
- 40 CFR Part 61, Subpart M, <u>National Emission Standard for Asbestos</u> (amended July 20, 2004)

VII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

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

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

A. Rules Added/Updated

None

B. Rules Not Updated

None

VIII. PERMIT REQUIREMENTS

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

A. District Rule 2020 - Exemptions

District Rule 2020 lists equipment which is specifically exempt from obtaining permits and specifies recordkeeping requirements to verify such exemptions. The amendments to this rule do not have any effect on current permit requirements and will therefore not be addressed in this evaluation.

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

District Rule 2201 has been amended since this facility's initial Title V permit was issued. However, the requirements of this rule are only triggered at the time the source undergoes a modification. All applicable requirements from any NSR permit actions have already been incorporated into the current Title V permit.

C. District Rule 2410 - Prevention of Significant Deterioration (PSD)

District Rule 2410 has been newly adopted since this Title V permit was issued. Requirements of this rule are only triggered at the time the source undergoes a modification. The facility will not be incorporating any ATCs as part of this TV renewal; therefore, the requirements of this rule do not apply.

D. District Rule 2520 - Federally Mandated Operating Permits

No changes to this Rule have occurred since issuance of the previous TV permit; however, greenhouse gas emissions will be addressed under Rule 2520 during this renewal.

Greenhouse Gas Discussion

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

E. 40 CFR Part 64 - Compliance Assurance Monitoring (CAM)

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

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

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

a. N-222-1-3 - OUTDOOR METAL PARTS AND PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN AND SPRAY GUN CLEANER

Unit N-222-1-3 is not subject to CAM because it does not have any add-on controls.

F. 40 CFR Part 82, Subpart B – <u>Servicing of Motor Vehicle Air</u> Conditioners

The purpose of 40 CFR Part 82 Subpart B is to implement section 609 of the Clean Air Act, as amended regarding the servicing of motor vehicle air conditioners (MVACs), and to implement section 608 of the Clean Air Act regarding certain servicing, maintenance, repair and disposal of air conditioners in MVACs and MVAC-like appliances.

These regulations apply to any person performing service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner.

The amendments to this rule do not have any effect on current permit requirements and will therefore not be addressed further in this evaluation.

N-222-0-2: Facility-Wide Requirements

• Condition 28 of the requirements of the draft renewed facility-wide permit is a mechanism to ensure compliance with this rule.

G. 40 CFR Part 82, Subpart F - Recycling and Emissions Reduction

The purpose of 40 CFR Part 82 Subpart F is to reduce emissions of class I and class II refrigerants and their substitutes to the lowest achievable level by maximizing the recapture and recycling of such refrigerants during the service, maintenance, repair, and disposal of appliances and restricting the sale of refrigerants consisting in whole or in part of a class I and class II ODS in accordance with Title VI of the Clean Air Act.

These regulations apply to any person servicing, maintaining, or repairing appliances. This subpart also applies to persons disposing of appliances, including small appliances and motor vehicle air conditioners. In addition, this subpart applies to refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recycling and recovery equipment, approved recycling and recovery equipment testing organizations, persons selling class I or class II refrigerants or offering class I or class II refrigerants for sale, and persons purchasing class I or class II refrigerants.

The amendments to this rule do not have any effect on current permit requirements and will therefore not be addressed further in this evaluation.

N-222-0-2: Facility-Wide Requirements

 Condition 27 of the requirements of the draft renewed facility-wide permit is a mechanism to ensure compliance with this rule.

IX. PERMIT SHIELD

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

A. Requirements Addressed by Model General Permit Templates

1. Model General Permit Template SJV-UM-0-3

By submitting Model General Permit Template SJV-UM-0-3 qualification form, the applicant has requested that a permit shield be granted for all the applicable requirements identified by the template. Therefore, the permit shields as granted in Model General Permit Template are included as conditions 1 and 38 of the facility-wide requirements (N-222-0-2).

X. CALIFORNIA ENVIRONMENTAL QUALITY ACT

The purpose of the Title V permit renewal is to update the permit to ensure that any changes to regulations since the issuance of the initial Title V permit or most recent renewal of the Title V permit are incorporated as permit requirements.

Per the California Environmental Quality Act (CEQA) Statute §21080.24, and CEQA Guidelines §15281, the issuance, modification, amendment, or renewal of any permit by an air pollution control district or air quality management district pursuant to Title V is exempt from CEQA, unless the issuance, modification, amendment, or renewal authorizes a physical or operational change to a source or facility. There will be no physical or operational change to the source or facility. Therefore, this project, a Title V permit renewal, is subject to a ministerial action that is exempt from CEQA.

XI. PERMIT CONDITIONS

See Attachment A - Draft Renewed Title V Operating Permit.

ATTACHMENTS

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

ATTACHMENT A

Draft Renewed Title V Operating Permit

San Joaquin Valley Air Pollution Control District

FACILITY: N-222-0-2

EXPIRATION

FACILITY-WIDE REQUIREMENTS

- The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1 and San Joaquin County Rule 110] Federally Enforceable Through Title V Permit
- The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0 and San Joaquin County Rule 110] Federally Enforceable Through Title V Permit
- {4364} The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
- {4365} Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V **Permit**
- {4366} The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.13.1] Federally Enforceable Through Title V Permit
- {4367} A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
- {4368} Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District, [District Rule 2040] Federally Enforceable Through Title V Permit
- {4369} The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
- {4370} The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520]9,42] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Repuir to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units

Facility Name: CBC STEEL BUILDINGS LLC Location: 1700 E LOUISE AVE, LATHROP, CA 95330

- 10. {4371} The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
- 11. {4372} Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
- 12. {4373} If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
- 13. {4374} It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
- 14. {4375} The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
- 15. {4376} The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
- 16. {4377} The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
- 17. {4378} The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
- 18. {4379} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
- 19. {4380} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
- 20. {4381} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
- 21. {4382} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V **Permit**
- 22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05), If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101 and San Voaculin County Rule 401] Federally Enforceable Through Title V Permit

 FACILITY WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

Location: 1700 E LOUISE AVE, LATHROP, CA 95330 N-222-0-2. May 21 2018 6 03AM - CHUMONUE

Facility Name: CBC STEEL BUILDINGS LLC

- 23. {4384} No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
- 24. {4385} All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
- 25. {4386} The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
- 26. {4387} With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
- 27. {4388} If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
- 28. {4389} If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
- 29. {4390} Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8021] Federally Enforceable Through Title V Permit
- 30. {4391} Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8031] Federally Enforceable Through Title V Permit
- 31. {4392} An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8041] Federally Enforceable Through Title V Permit
- 32. {4393} Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8051] Federally Enforceable Through Title V Permit
- 33. {4394} Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8061] Federally Enforceable Through Title V Permit
- 34. {4395} Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8071] Federally Enforceable Through Title V Permit
- 35. {4396} Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation) [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit

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

Facility Name: CBC STEEL BUILDINGS LLC Location: 1700 E LOUISE AVE, LATHROP, CA 95330

N-222-0-2 May 21 2016 8 03AM - ONUMORUE

- 36. {4397} The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
- 37. {4398} The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
- 38. {4399} When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
- 39. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 40. On September 30, 2012, the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report are based upon this initial permit issuance date, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

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

Facility Name: CBC STEEL BUILDINGS LLC Location: 1700 E LOUISE AVE, LATHROP, CA 95330

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-222-1-3

EQUIPMENT DESCRIPTION:

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

PERMIT UNIT REQUIREMENTS

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

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

Facility Name: CBC STEEL BUILDINGS LLC Location: 1700 E LOUISE AVE, LATHROP, CA 95330 N-222-1-3: May 30 2016 9 25AM - ONUMONUE

- 8. An operator shall: store all VOC-containing coatings, thinners, cleaning materials, and waste materials in closed non-absorbent and non-leaking containers, keeping the containers closed except when specifically in use; close mixing vessels that contain VOC coatings and other materials, except when specifically in use; minimize spill of any VOC-containing materials and clean up spills immediately; and convey VOC-containing materials in closed containers or pipes. [District Rule 4603] Federally Enforceable Through Title V Permit
- 9. An operator shall store or dispose of fresh or spent, solvents, waste solvent cleaning materials such as cloth, paper, etc, coatings, adhesives, catalysts, and thinners in closed, non-absorbent and non-leaking containers, keeping the containers closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4603] Federally Enforceable Through Title V Permit
- 10. Only HVLP, electrostatic, electrodeposition, flow, roll, dip, brush or continuous coating application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations.

 [District Rule 4603] Federally Enforceable Through Title V Permit
- 11. Permittee shall demonstrate that HVLP guns manufactured prior to 1/1/96 operate between 0.1 and 10 psig air atomizing pressure, by manufacturer's published technical material or by use of a certified air pressure tip gauge. [District Rule 4603] Federally Enforceable Through Title V Permit
- 12. The permittee shall maintain a current list of coatings and solvents in use which contains all of the coating data necessary to evaluate compliance, including the following information: mix ratio of components used, VOC content and specific chemical constituents of coatings as applied, and VOC content and specific chemical constituents of solvents used for surface preparation and cleanup. [District Rule 4603] Federally Enforceable Through Title V Permit
- 13. Permittee shall maintain daily records which include the following information: volume coating/solvent mix ratio, VOC content (lb/gal or grams/liter) and, for dip coating operations, viscosity (cSt) of coating, volume of each coating used (gallons), and quantity of cleanup solvent used (gallons). [District Rule 4603] Federally Enforceable Through Title V Permit
- 14. The permittee shall maintain a record of the cumulative quantity of VOC emitted by this coating operation based on a rolling 12-month period. The cumulative total shall be updated at least monthly. [District Rules 2201 & 4603] Federally Enforceable Through Title V Permit
- 15. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request.

 [District Rule 4603] Federally Enforceable Through Title V Permit

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

Facility Name: CBC STEEL BUILDINGS LLC Location: 1700 E LOUISE AVE, LATHROP, CA 95330

N-222-1-3 May 30 2018 9 25AM - ONUMONUE

ATTACHMENT B

Previous Title V Operating Permit

San Joaquin Valley Air Pollution Control District

FACILITY: N-222-0-1 EXPIRATION DATE: 07/31/2017

FACILITY-WIDE REQUIREMENTS

- 1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1 and San Joaquin County Rule 110] Federally Enforceable Through Title V Permit
- 2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0 and San Joaquin County Rule 110] Federally Enforceable Through Title V Permit
- 3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
- 4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
- 5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.13.1] Federally Enforceable Through Title V Permit
- 6. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District Rule 2031] Federally Enforceable Through Title V Permit
- 7. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
- 8. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
- 9. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

- 10. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
- 11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
- 12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
- 13. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
- 14. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
- 15. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
- 16. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
- 17. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
- 18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
- 19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
- 20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
- 21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit
- 22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101 and San Joaquin County Rule 401] Federally Enforceable Through Title V Permit

- 23. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.11 Federally Enforceable Through Title V Permit
- 24. All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
- 25. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
- 26. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
- 27. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
- 28. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
- 29. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8021] Federally Enforceable Through Title V Permit
- Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8031] Federally Enforceable Through Title V Permit
- 31. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8041] Federally Enforceable Through Title V Permit
- 32. Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8051] Federally Enforceable Through Title V Permit
- 33. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8061] Federally Enforceable Through Title V Permit
- 34. Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8071] Federally Enforceable Through Title V Permit
- 35. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit

- 36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits. including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
- 37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date, [District Rule 2520, 5.2] Federally Enforceable Through Title V **Permit**
- 38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V **Permit**
- 39. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 40. On September 30, 2012, the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report are based upon this initial permit issuance date, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-222-1-2 EXPIRATION DATE: 07/31/2017

EQUIPMENT DESCRIPTION:

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

PERMIT UNIT REQUIREMENTS

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

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

Facility Name: CBC STEEL BUILDINGS LLC
Location: 1700 E LOUISE AVE, LATHROP, CA 95330
N-222-1-2. May 21 2016 7 55AM - ONLMONUE

- 8. An operator shall: store all VOC-containing coatings, thinners, cleaning materials, and waste materials in closed non-absorbent and non-leaking containers, keeping the containers closed except when specifically in use; close mixing vessels that contain VOC coatings and other materials, except when specifically in use; minimize spill of any VOC-containing materials and clean up spills immediately; and convey VOC-containing materials in closed containers or pipes. [District Rule 4603] Federally Enforceable Through Title V Permit
- 9. An operator shall store or dispose of fresh or spent, solvents, waste solvent cleaning materials such as cloth, paper, etc, coatings, adhesives, catalysts, and thinners in closed, non-absorbent and non-leaking containers, keeping the containers closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4603] Federally Enforceable Through Title V Permit
- 10. Only HVLP, electrostatic, electrodeposition, flow, roll, dip, brush or continuous coating application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations.

 [District Rule 4603] Federally Enforceable Through Title V Permit
- 11. Permittee shall demonstrate that HVLP guns manufactured prior to 1/1/96 operate between 0.1 and 10 psig air atomizing pressure, by manufacturer's published technical material or by use of a certified air pressure tip gauge. [District Rule 4603] Federally Enforceable Through Title V Permit
- 12. The permittee shall maintain a current list of coatings and solvents in use which contains all of the coating data necessary to evaluate compliance, including the following information: mix ratio of components used, VOC content and specific chemical constituents of coatings as applied, and VOC content and specific chemical constituents of solvents used for surface preparation and cleanup. [District Rule 4603] Federally Enforceable Through Title V Permit
- 13. Permittee shall maintain daily records which include the following information: volume coating/solvent mix ratio, VOC content (lb/gal or grams/liter) and, for dip coating operations, viscosity (cSt) of coating, volume of each coating used (gallons), and quantity of cleanup solvent used (gallons). [District Rule 4603] Federally Enforceable Through Title V Permit
- 14. The permittee shall maintain a record of the cumulative quantity of VOC emitted by this coating operation based on a rolling 12-month period. The cumulative total shall be updated at least monthly. [District Rules 2201 & 4603] Federally Enforceable Through Title V Permit
- 15. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4603] Federally Enforceable Through Title V Permit

ATTACHMENT C

Detailed Summary List of Facility Permits

CBC STEEL BUILDINGS LLC 1700 E LOUISE AVE LATHROP, CA 95330

Detailed Facility Report For Facility=222

Sorted by Facility Name and Permit Number N 222 TYPE: TOXIC ID:

TitleV 20292

EXPIRE ON: AREA: INSP. DATE:

5/21/18 8:15 am

07/18 07/31/2017

N-222-1-2 PERMIT NUMBER FEE DESCRIPTION Miscellaneous 3020-06 FEE RULE ΩTY FEE AMOUNT 116.00 116.00 FEE TOTAL PERMIT STATUS Þ OUTDOOR METAL PARTS AND PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN AND SPRAY GUN CLEANER **EQUIPMENT DESCRIPTION**

TELEPHONE: STATUS:

2099830910

Number of Facilities Reported: 1