

JUN 25 2019

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

**Re: Proposed ATC / Certificate of Conformity (Significant Mod)**  
**Facility Number: C-1080**  
**Project Number: C-1182078**

Dear Ms. Topoozian:

Enclosed for your review is the District's analysis of an application for Authorities to Construct 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. This project authorizes the modification of seven motor vehicle and mobile equipment coating operations to convert the existing daily facility-wide VOC emission limit of 149.0 lb/day to an equivalent annual facility-wide VOC emission limit of 54,385 lb/year and to make other minor changes to the permitted PM10 emission limits.

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.

Thank you for your cooperation in this matter.

Sincerely,



Arnaud Marjollet  
Director of Permit Services

Enclosures

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

**Samir Sheikh**  
Executive Director/Air Pollution Control Officer

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# San Joaquin Valley Air Pollution Control District

## Authority to Construct Application Review

### *Modification of Seven Motor Vehicle and Mobile Equipment Coating Operations*

Facility Name: Scelzi Enterprises Inc.

Date: June 17, 2019

Mailing Address: 2286 E Date Ave  
Fresno, CA 93706

Engineer: Dustin Brown

Lead Engineer: Jerry Sandhu

Contact Person: Angel Topoozian

Telephone: (559) 281-3698

E-Mail: atopoozian@gmail.com

Application #(s): C-1080-1-6, '-2-7, '-4-4, '-7-4, '-9-4, '-11-1, and '-12-1

Project #: C-1182078

Deemed Complete: December 5, 2018

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## I. Proposal

Scelzi Enterprises, Inc. (Scelzi) has requested seven Authority to Construct (ATC) permits for the modification of seven motor vehicle and mobile equipment coating operations (current permits C-1080-1-3, '-2-4, '-4-1, '-7-1, '-9-1, '-11-0 and '-12-0 included in Appendix B). The proposed modifications to these coating operations are summarized below:

### All Units (C-1080-1-6, '-2-7, '-4-4, '-7-4, '-9-4, '-11-1, '-12-1):

- Convert the existing daily facility-wide VOC emission limit of 149.0 lb/day to an annual facility-wide VOC emission limit of 54,385 lb/year (equivalent to the existing daily facility-wide emission limit multiplied by a worst-case operating schedule of 365 days per year: 149.0 lb/day x 365 days/year = 54,385 lb/year).
- Note that the facility has an existing annual facility-wide PM<sub>10</sub> emission limit of 29,199 lb/year. That facility-wide PM<sub>10</sub> emission limit will remain unchanged after this project.

### Units C-1080-1-6 and '-4-4:

- Convert the existing daily facility-wide VOC emission limit of 149.0 lb/day to a permit unit specific daily VOC emission limit of 149.0 lb/day for each unit.
- Decrease the existing permitted daily PM<sub>10</sub> emission limit of 50.0 lb/day to 19.0 lb/day for each permit unit.

### Unit C-1080-2-7:

- Increase the existing permit unit specific permitted daily PM<sub>10</sub> emission limit of 14.5 lb/day to 19.0 lb/day.
- Remove the permit exempt paint booth heater from the equipment listing of this coating operation as it is no longer in service.

Unit C-1080-7-4:

- Decrease the existing permitted daily PM<sub>10</sub> emission limit of 23.3 lb/day to 19.0 lb/day.

Unit C-1080-9-4:

- Convert the existing daily facility-wide VOC emission limit of 149.0 lb/day to a permit unit specific daily VOC emission limit of 149.0 lb/day.

Unit C-1080-11-1:

- Convert the existing daily facility-wide VOC emission limit of 149.0 lb/day to a permit unit specific daily VOC emission limit of 149.0 lb/day.
- Increase the daily PM<sub>10</sub> emission limit from 5.4 lb/day to 19.0 lb/day.

Unit C-1080-12-1:

- Increase the existing daily permit unit specific VOC emission limit of 40.0 lb/day to 149.0 lb/day.
- Remove the existing annual permit unit specific VOC emission limit of 10,400 lb/year (the proposed facility-wide VOC specific limiting condition (SLC) will limit annual emissions from all units to 54,385 lb/year).
- Increase the existing daily permit unit specific PM<sub>10</sub> emission limit of 3.2 lb/day to 19.0 lb/day.

Scelzi Enterprises received their Title V Permit on October 31, 2013. 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 Enterprises must apply to administratively amend their Title V permit.

## II. Applicable Rules

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 4001	New Source Performance Standards (4/14/99)
Rule 4002	National Emissions Standards for Hazardous Air Pollutants (5/20/04)
Rule 4101	Visible Emissions (2/17/05)
Rule 4102	Nuisance (12/17/92)
Rule 4201	Particulate Matter Concentration (12/17/92)
Rule 4301	Fuel Burning Equipment (12/17/92)
Rule 4612	Motor Vehicle and Mobile Equipment Coating Operations (10/21/10)
Rule 4801	Sulfur Compounds (12/17/92)
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 two addresses are located around the corner from one another and are located on contiguous properties. Therefore, they are considered part of the same stationary source and are permitted under on facility ID number.

The District has verified that the facility is not located within 1,000 feet of the outer boundary of any K-12 school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project and no further discussion is required.

### **IV. Process Description**

Scelzi operates a custom truck body manufacturing facility at this location. Truck frames with pre-assembled cabs and engines are received by this facility. Truck beds and/or bodies are then manufactured at this facility and installed on the truck frames in accordance with customer specifications. The facility utilizes a variety of motor vehicle and mobile equipment coating booths/operations during the truck bed/body assembly.

The paint spray operations being modified in this project 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 booths. In addition, the coating operation under permit C-1080-11 is also equipped with a natural gas-fired booth heater, which is used to assist in the drying of the coated parts.

The proposed project will not result in any physical changes to the coating operations or their methods of operation. The changes to the emission limits are being made to allow for improved operational efficiency throughout the facility and for consistency purposes between the various operations and permit requirements.

### **V. Equipment Listing**

#### Pre-Project Equipment Descriptions:

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-1080-11-0: 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)

Proposed Modifications:

For units C-1080-1, '-4, '-9, '-11, and '-12, convert the existing facility-wide VOC emission limit of 149.0 lb-VOC/day to permit-specific daily VOC emission limits of 149.0 lb-VOC/day for each unit. For all units except unit C-1080-9, Scelzi Enterprises is also proposing to modify (increase or decrease) the permit-specific daily PM<sub>10</sub> emission limits such that all permit units have a consistent limit of 19.0 lb-PM<sub>10</sub>/day. The facility is proposing to convert the existing facility-wide daily VOC emission limit of 149.0 lb/day to an equivalent facility-wide annual VOC emission limit of 54,385 lb-VOC/year. In addition, the permit exempt paint booth heater will be administratively removed from unit C-1080-2.

- C-1080-1-6: 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: CONVERT EXISTING DAILY FACILITY-WIDE VOC EMISSION LIMIT OF 149.0 LB/DAY TO AN EQUIVALENT ANNUAL FACILITY-WIDE VOC EMISSION LIMIT

OF 54,385 LB/YEAR, ESTABLISH A PERMIT SPECIFIC VOC DAILY EMISSION LIMIT OF 149.0 LB/DAY, AND LOWER PM<sub>10</sub> EMISSION LIMIT FROM 50.0 LB/DAY TO 19.0 LB/DAY

- C-1080-2-7: 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-FIRED BOOTH HEATER (LESS THAN 20.0 MMBTU/DAY HEAT INPUT): CONVERT EXISTING DAILY FACILITY-WIDE VOC EMISSION LIMIT OF 149.0 LB/DAY TO AN EQUIVALENT ANNUAL FACILITY-WIDE VOC EMISSION LIMIT OF 54,385 LB/YEAR, INCREASE THE PERMIT SPECIFIC PM<sub>10</sub> EMISSION LIMIT FROM 14.5 LB/DAY TO 19.0 LB/DAY, AND REMOVE PERMIT EXEMPT BOOTH HEATER
- C-1080-4-4: 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: CONVERT EXISTING DAILY FACILITY-WIDE VOC EMISSION LIMIT OF 149.0 LB/DAY TO AN EQUIVALENT ANNUAL FACILITY-WIDE VOC EMISSION LIMIT OF 54,385 LB/YEAR, ESTABLISH A PERMIT SPECIFIC VOC DAILY EMISSION LIMIT OF 149.0 LB/DAY, AND LOWER PM<sub>10</sub> EMISSION LIMIT FROM 50.0 LB/DAY TO 19.0 LB/DAY
- C-1080-7-4: 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: CONVERT EXISTING DAILY FACILITY-WIDE VOC EMISSION LIMIT OF 149.0 LB/DAY TO AN EQUIVALENT ANNUAL FACILITY-WIDE VOC EMISSION LIMIT OF 54,385 LB/YEAR AND LOWER PM<sub>10</sub> EMISSION LIMIT FROM 23.3 LB/DAY TO 19.0 LB/DAY
- C-1080-9-4: MODIFICATION OF MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATION (UNDERCOATING OPERATION) WITH AIRLESS SPRAY GUN(S) AND AN ENCLOSED SPRAY GUN CLEANER: REMOVE ANNUAL VOC EMISSION LIMIT OF 10,400 LB/YEAR, CONVERT EXISTING DAILY FACILITY-WIDE VOC EMISSION LIMIT OF 149.0 LB/DAY TO AN EQUIVALENT ANNUAL FACILITY-WIDE VOC EMISSION LIMIT OF 54,385 LB/YEAR, AND ESTABLISH A PERMIT SPECIFIC VOC DAILY EMISSION LIMIT OF 149.0 LB/DAY

- C-1080-11-1: MODIFICATION OF 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: CONVERT EXISTING DAILY FACILITY-WIDE VOC EMISSION LIMIT OF 149.0 LB/DAY TO AN EQUIVALENT ANNUAL FACILITY-WIDE VOC EMISSION LIMIT OF 54,385 LB/YEAR, ESTABLISH A PERMIT SPECIFIC VOC DAILY EMISSION LIMIT OF 149.0 LB/DAY, AND INCREASE THE PM<sub>10</sub> EMISSION LIMIT FROM 5.4 LB/DAY TO 19.0 LB/DAY
- C-1080-12-1: MODIFICATION OF 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: INCREASE DAILY VOC EMISSION LIMIT OF 40.0 LB/DAY TO 149.0 LB/DAY, REMOVE PERMIT SPECIFIC ANNUAL VOC EMISSION LIMIT, CONVERT EXISTING DAILY FACILITY-WIDE VOC EMISSION LIMIT OF 149.0 LB/DAY TO AN EQUIVALENT ANNUAL FACILITY-WIDE VOC EMISSION LIMIT OF 54,385 LB/YEAR, AND INCREASE THE PM<sub>10</sub> EMISSION LIMIT FROM 3.2 LB/DAY TO 19.0 LB/DAY

Post Project Equipment Descriptions:

- C-1080-1-6: 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-1080-2-7: MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATION INCLUDING A TRUCK BED LINER COATING OPERATION WITH A PAINT SPRAY BOOTH WITH DRY EXHAUST FILTERS
- C-1080-4-4: 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) AND AN ATTACHED DRYING ROOM WITH A PERMIT EXEMPT NATURAL GAS-FIRED BOOTH HEATER (LESS THAN 20.0 MMBTU/DAY HEAT INPUT)
- C-1080-7-4: 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-1080-9-4: MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATION (UNDERCOATING OPERATION)

C-1080-11-1: 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-1080-12-1: 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. Emission Control Technology Evaluation

Only PM<sub>10</sub> and VOC are emitted from these motor vehicle and mobile equipment coating operation. Except for the undercoating operation (permit C-1080-9), all coating operations are performed inside of an enclosed paint spray booth with a dry exhaust filter system for PM<sub>10</sub> control. The paint spray booth with a dry exhaust filter system will control PM<sub>10</sub> emissions by filtering air from inside the paint booth before it is exhausted to the atmosphere.

In addition, HVLP spray equipment, Graco Plural Component spray equipment (bed liner coating), and airless spray equipment (undercoating operation) for PM<sub>10</sub> and VOC control are utilized by all of the coating operations at this facility. The spray equipment will help to limit the PM<sub>10</sub> and VOC emissions from the coating operations by having more coating transferred to the desired surfaces than traditional painting equipment.

The coating operation under permit C-1080-11 is equipped with a booth heater that will be fired solely on natural gas fuel.

## VII. General Calculations

### A. Assumptions

- The facility-wide PM<sub>10</sub> emissions shall not exceed 29,199 lb/year (current permit limit, no proposed change).
- Prior to these modifications, the facility-wide VOC emissions shall not exceed 149.0 lb/day (current permit limit).
- After these modifications, the facility-wide VOC emissions shall not exceed 54,385 lb/year, equivalent to 149.0 lb/day x 365 days/year (proposed by the applicant).
- For units C-1080-1, '-4, '-7, '-9, and '-11, permit specific daily VOC limits of 149.0 lb/day will be added as a part of this project (proposed by the applicant).
- For units C-1080-1 and '-4, the daily PM<sub>10</sub> emission limit will be decreased from 50.0 lb/day to 19.0 lb/day (proposed by the applicant).
- For unit C-1080-2, the daily VOC emission limit of 50.0 lb/day will remain unchanged and the daily PM<sub>10</sub> emission limit will be increased from 14.5 lb/day to 19.0 lb/day (proposed by the applicant).
- For unit C-1080-7, the daily VOC emission limit of 99.0 lb/day will remain unchanged and the daily PM<sub>10</sub> emission limit will be decreased from 23.3 lb/day to 19.0 lb/day (proposed by the applicant).



- For unit C-1080-9, underbody coating is applied using airless application equipment only (project C-1092065 and proposed by the applicant).
- For unit C-1080-11, the daily PM<sub>10</sub> emission limit will be increased from 5.4 lb/day to 19.0 lb/day (proposed by the applicant).
- For unit C-1080-12, prior to this project, the emissions shall not exceed any of the following limits: 40.0 lb-VOC/day; 3.2 lb-PM<sub>10</sub>/day; and 10,400 lb-VOC/year (current permit limits).
- For unit C-1080-12, after the modifications in this project, the emissions shall not exceed any of the following limits: 149.0 lb-VOC/day; 19.0 lb-PM<sub>10</sub>/day; and 54,385 lb-VOC/year (proposed by the applicant).
- 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 coating operations, is expected to be 80% (reference project C-1171970).
- For the coating operations equipped with paint spray booths, the 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)).
- To streamline emission calculations, PM<sub>2.5</sub> emissions are assumed to be equal to PM<sub>10</sub> emissions. Only if needed to determine if a project is a Federal major modification for PM<sub>2.5</sub> will specific PM<sub>2.5</sub> emission calculations be performed.

## B. Emission Factors

### Coating Operations:

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

Each of the permits for these coating operations limit the total daily VOC and PM<sub>10</sub> emission rates. Therefore, specific emission factors for the coatings are not necessary and will not be utilized for the purposes of this project.

### Booth Heater (C-1080-11):

The emission factors from the combustion of natural gas in the paint booth heater serving this unit can be calculated using the following emission factors:

Pollutant	Emission Factors	Source
NO <sub>x</sub>	0.10 lb-NO <sub>x</sub> /MMBtu	Current Permit
SO <sub>x</sub>	0.00285 lb-SO <sub>x</sub> /MMBtu	Current Permit
PM <sub>10</sub>	0.0076 lb-PM <sub>10</sub> /MMBtu	Current Permit
CO	0.084 lb-CO/MMBtu	Current Permit
VOC	0.0055 lb-VOC/MMBtu	Current Permit

**C. Calculations**

**1. Pre-Project Potential to Emit (PE1)**

C-1080-1, '-2, '-4, '-7, '-9, and '-12:

The daily PE1 values for each of these units are summarized in the table below and were taken from the current permits. Units C-1080-1, '-4, '-9, and '-11 only contain a facility-wide daily VOC emission limit of 149 lb/day and do not contain permit specific daily VOC emission limits. As a worst case, it will be assumed that each of these units, by themselves, could have potentially emitted up to the existing facility-wide daily VOC emission limit on any given day. Therefore, the daily PE1 for each of these units will be set equal to the daily facility-wide emission limit.

The annual PE1 values for units C-1080-1, '-2, '-4, '-7, and '-9 were established using a worst case operating schedule of 365 days per year. The annual PE1 value for unit C-1080-12 was taken from the current permit.

<b>Pre-Project Potentials to Emit (PE1)</b>				
<b>Permit</b>	<b>Daily VOC (lb/day)</b>	<b>Annual VOC (lb/year)</b>	<b>Daily PM<sub>10</sub> (lb/year)</b>	<b>Annual PM<sub>10</sub> (lb/year)</b>
C-1080-1-4	149.0	54,385	50.0	18,250
C-1080-2-5	50.0	18,250	14.5	5,293
C-1080-4-2	149.0	54,385	50.0	18,250
C-1080-7-2	99.0	36,135	23.3	8,505
C-1080-9-2	149.0	54,385	50.0	18,250
C-1080-12-0	40.0	10,400	3.2	1,168

C-1080-11:

Coating Operation:

The daily PE1 values for this unit are summarized in the table below and were taken from the current permit. This unit only contains an existing daily facility-wide VOC emission limit of 149 lb/day and does not contain permit specific daily VOC emission limits. As a worst case, it will be assumed that this unit, by itself, could have emitted up to the existing facility-wide daily VOC emission limit on any given day. Therefore, the daily PE1 for this unit will be set equal to the daily facility-wide emission limit.

The annual PE1 values for this unit was established using a worst case operating schedule of 365 days per year.

Pre-Project Potentials to Emit (PE1)				
Pollutant	Daily VOC (lb/day)	Annual VOC (lb/year)	Daily PM <sub>10</sub> (lb/year)	Annual PM <sub>10</sub> (lb/year)
C-1080-11-0	149.0	54,385	5.4	1,971

Paint Booth Heater:

The PE1 values from the booth heater can be calculated using the emission factors listed above, the maximum burner rating and a worst-case operating schedule of 24 hours per day and 365 days per year.

$$\text{Daily PE1} = \text{EF (lb/MMBtu)} \times \text{Burner Rating (MMBtu/hr)} \times \text{Operation (hr/day)}$$

$$\text{Annual PE1} = \text{EF (lb/MMBtu)} \times \text{Burner Rating (MMBtu/hr)} \times \text{Operation (hr/day)} \times 365 \text{ days/year}$$

Natural Gas-Fired Heater PE1						
Pollutant	EF (lb/MMBtu)	Heater Rating (MMBtu/hr)	Daily Operation (hr/day)	Annual Operation (day/year)	Daily PE2 (lb/day)	Annual PE2 (lb/year)
NO <sub>x</sub>	0.10	3.0	24	365	7.2	2,628
SO <sub>x</sub>	0.00285				0.2	75
PM <sub>10</sub>	0.0076				0.5	200
CO	0.084				6.0	2,208
VOC	0.0055				0.4	145

Total Emissions from C-1080-11:

Total Daily PE1 from C-1080-11			
Pollutant	PE1 <sub>Coating</sub> (lb/day)	PE1 <sub>Booth Heater</sub> (lb/day)	PE1 <sub>Total</sub> (lb/day)
NO <sub>x</sub>	0	7.2	7.2
SO <sub>x</sub>	0	0.2	0.2
PM <sub>10</sub>	5.4	0.5	5.4 <sup>(1)</sup>
CO	0	6.0	6.0
VOC	149.0	0.4	149.0 <sup>(1)</sup>

<sup>(1)</sup> The total permit specific emissions are limited to 5.4 lb-PM<sub>10</sub>/day and 149.0 lb-VOC/day respectively. The emissions can all come from the coating operation if the booth heater is not used during a given day. Or a combination of the coating operation emissions plus the booth heater emissions on days when the the booth heater is in use.

<b>Total Annual PE1 from C-1080-11</b>			
<b>Pollutant</b>	<b>PE1<sub>Coating</sub> (lb/year)</b>	<b>PE1<sub>Booth Heater</sub> (lb/year)</b>	<b>PE1<sub>Total</sub> (lb/year)</b>
NO <sub>x</sub>	0	2,628	2,628
SO <sub>x</sub>	0	75	75
PM <sub>10</sub>	1,971	200	1,971 <sup>(2)</sup>
CO	0	2,208	2,208
VOC	54,385	145	54,385 <sup>(2)</sup>

## 2. Post Project Potential to Emit (PE2)

C-1080-1, '-2, '-4, '-7, and '-9:

VOC:

The applicant is not proposing to modify the existing VOC emission limits associated with units C-1080-2, and '-7 as a part of this project. For units C-1080-1, '-4, '-9, and '-11, the applicant is only proposing to convert the existing facility-wide VOC emission limit to permit specific daily VOC emission limit for each unit. Therefore, the PE2 values for VOC emissions are not changing as a part of this project and can be set equal to the PE1 values shown in section VII.C.1 above.

PM<sub>10</sub>:

For units C-1080-1, '-2, '-4, and '-7 the applicant is proposing to increase or decrease the PM<sub>10</sub> emissions from each of these units such that they all have a consistent limit of 19.0 lb/day. For unit C-1080-9, this underbody coating operation does not take place inside of a paint booth and is not equipped with any exhaust filters. Therefore, the applicant is not requesting to modify the existing PM<sub>10</sub> emission limit for this permit unit.

The annual VOC and PM<sub>10</sub> emissions will be determined using a worst-case operating schedule of 365 days/year.

<sup>(2)</sup> The total permit specific emissions are limited to 1,971 lb-PM<sub>10</sub>/year and 54,385 lb-VOC/year respectively. The emissions can all come from the coating operation if the booth heater is not used during a given year. Or a combination of the coating operation emissions plus the booth heater emissions on years when the the booth heater is in use.

Post-Project Potentials to Emit (PE2)				
Permit	Daily VOC (lb/day)	Annual VOC (lb/year)	Daily PM <sub>10</sub> (lb/year)	Annual PM <sub>10</sub> (lb/year)
C-1080-1-6	149.0	54,385	19.0	18,250
C-1080-2-7	50.0	18,250	19.0	5,293
C-1080-4-4	149.0	54,385	19.0	18,250
C-1080-7-4	99.0	36,135	19.0	8,505
C-1080-9-4	149.0	54,385	50.0	18,250

C-1080-11:

For this unit, the applicant is proposing to convert the existing daily facility-wide VOC emission limit to a permit specific VOC emission limit. They are also proposing to increase the daily PM<sub>10</sub> emission limit to 19.0 lb/day to make it a more consistent limit on each of the coating operations at the facility. There are no proposed changes to the paint booth heater as a part of this project. The annual emissions will be determined using a worst case operating schedule of 365 days/year. Therefore, the post-project emissions from this permit unit are summarized below:

Total Daily PE2 from C-1080-11			
Pollutant	PE2 <sub>Coating</sub> (lb/day)	PE2 <sub>Booth Heater</sub> (lb/day)	PE2 <sub>Total</sub> (lb/day)
NO <sub>x</sub>	0	7.2	7.2
SO <sub>x</sub>	0	0.2	0.2
PM <sub>10</sub>	19.0	0.5	19.0 <sup>(3)</sup>
CO	0	6.0	6.0
VOC	149.0	0.4	149.0 <sup>(3)</sup>

<sup>(3)</sup> The total permit specific emissions are limited to 19.0 lb-PM<sub>10</sub>/day and 149.0 lb-VOC/day respectively. The emissions can all come from the coating operation if the booth heater is not used during a given day. Or a combination of the coating operation emissions plus the booth heater emissions on days when the the booth heater is in use.

<b>Total Annual PE2 from C-1080-11</b>			
<b>Pollutant</b>	<b>PE2<sub>Coating</sub> (lb/year)</b>	<b>PE2<sub>Booth Heater</sub> (lb/year)</b>	<b>PE2<sub>Total</sub> (lb/year)</b>
NO <sub>x</sub>	0	2,628	2,628
SO <sub>x</sub>	0	75	75
PM <sub>10</sub>	6,935	200	6,935 <sup>(4)</sup>
CO	0	2,208	2,208
VOC	54,385	145	54,385 <sup>(4)</sup>

C-1080-12:

Daily PE2:

The applicant is proposing to increase the VOC emissions from this unit from 40 lb/day to 149 lb/day. In addition, the applicant is also proposing to increase the PM<sub>10</sub> emissions from 3.2 lb/day to 19.0 lb/day. Therefore, the daily emissions from this unit are shown below:

<b>Daily PE2</b>	
<b>Pollutant</b>	<b>PE2 (lb/day)</b>
PM <sub>10</sub>	19.0
VOC	149.0

Annual PE2:

The applicant is proposing to increase the annual VOC emissions from this unit from 10,400 lb/year to 54,385 lb/year. The annual VOC emissions are based on the daily VOC emissions multiplied by a worst-case operating schedule of 365 days/year. Therefore, the annual PM<sub>10</sub> emissions will also be determined using a worst-case operating schedule of 365 days/year.

<sup>(4)</sup> The total permit specific emissions are limited to 6,935 lb-PM<sub>10</sub>/year and 54,385 lb-VOC/year respectively. The emissions can all come from the coating operation if the booth heater is not used during a given year. Or a combination of the coating operation emissions plus the booth heater emissions on years when the the booth heater is in use.

Annual PE2	
Pollutant	PE2 (lb/year)
PM <sub>10</sub>	6,935
VOC	54,385

### 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.

The SSPE1 values listed in the table below were taken from the SSPE2 values calculated in project C-1171970, the most recent ATC project processed for this facility finalized in October of 2017. Note that the pre-project facility-wide VOC and PM<sub>10</sub> emissions are limited to 149.0 lb/day (149 lb/day x 365 day/year = 54,385 lb/year) and 29,199 lb/year, respectively.

SSPE1 (lb/year)					
Permit Unit	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
C-1080-1-4	0	0	29,199	0	54,385
C-1080-2-5	0	0		0	
C-1080-4-2	0	0		0	
C-1080-7-2	0	0		0	
C-1080-9-2	0	0		0	
C-1080-11-0	2,628	75		2,208	
C-1080-12-0	0	0		0	
<b>SSPE1</b>	<b>2,628</b>	<b>75</b>	<b>29,199</b>	<b>2,208</b>	<b>54,385</b>

### 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 AER that have occurred at the source, and which have not been used on-site.

<b>SSPE2 (lb/year)</b>					
<b>Permit Unit</b>	<b>NO<sub>x</sub></b>	<b>SO<sub>x</sub></b>	<b>PM<sub>10</sub></b>	<b>CO</b>	<b>VOC</b>
C-1080-1-6	0	0	29,199	0	54,385
C-1080-2-7	0	0		0	
C-1080-4-4	0	0		0	
C-1080-7-4	0	0		0	
C-1080-9-4	0	0		0	
C-1080-11-1	2,628	75		2,208	
C-1080-12-1	0	0		0	
<b>SSPE2</b>	<b>2,628</b>	<b>75</b>	<b>29,199</b>	<b>2,208</b>	<b>54,385</b>

## 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

<b>Rule 2201 Major Source Determination (lb/year)</b>						
	<b>NO<sub>x</sub></b>	<b>SO<sub>x</sub></b>	<b>PM<sub>10</sub></b>	<b>PM<sub>2.5</sub>*</b>	<b>CO</b>	<b>VOC</b>
SSPE1	2,628	75	29,199	29,199	2,208	54,385
SSPE2	2,628	75	29,199	29,199	2,208	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<sub>2.5</sub> assumed to be equal to PM<sub>10</sub>.

As seen in the table above, the facility is an existing Major Source for VOC emissions and will remain a Major Source for VOC emissions after 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 <sub>2</sub>	VOC	SO <sub>2</sub>	CO	PM	PM <sub>10</sub>
Estimated Facility PE before Project Increase	1.3	27.2	0.0	1.1	14.6	14.6
PSD Major Source Thresholds	250	250	250	250	250	250
PSD Major Source?	No	No	No	No	No	No

**6. Baseline Emissions (BE)**

The BE calculation (in lb/year) is performed pollutant-by-pollutant for each unit within the project to calculate the QNEC, and if applicable, to determine the amount of offsets required.

Pursuant to District Rule 2201, BE = PE1 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.

**a. NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, and CO Emissions**

As shown above, the facility is not a major source for NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, or CO emissions. Therefore, the BE for NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, or CO emissions from each of these coating operations can be set equal to the PE1 values calculated above.

NO <sub>x</sub> , SO <sub>x</sub> , PM <sub>10</sub> and CO Baseline Emissions (lb/year)				
Pollutant	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO
C-1080-1-3	0	0	29,199	0
C-1080-2-5	0	0		0
C-1080-4-1	0	0		0
C-1080-7-2	0	0		0
C-1080-9-1	0	0		0
C-1080-11-0	2,628	75		2,208
C-1080-12-0	0	0		0

**b. VOC Emissions**

As shown in Section VII.C.5 above, the facility is a major source for VOC emissions.

Pursuant to Rule 2201, Section 3.13, a Clean Emissions Unit (CEU) is defined as an emissions unit that is equipped with an emissions control technology with a minimum control efficiency of at least 95% or is equipped with emission control technology that meets the requirements for achieved-in-practice BACT as accepted by the APCO during the five years immediately prior to the submission of the complete application. For units in SLCs, all units in the SLC need to be considered CEUs, otherwise, none of the units in the SLC can be considered CEUs.

C-1080-1, '-2, '-4, '-7, '-11, and -12 (motor vehicle coating operations):

Each of these operations are traditional motor vehicle and mobile equipment coating operations with conventional coating application equipment (e.g. HVLP). BACT guideline 4.2.1 applies to motor vehicle coating operations. Therefore, BACT guideline 4.2.1 applies to each of the existing motor vehicle coating operations being modified in this project. BACT guideline 4.2.1 lists achieved in practice for VOC emissions as utilizing HVLP spray guns and coatings and cleaning materials/solvents that are compliant with the requirements of District Rule 4612. The current permits for each of these existing motor vehicle and mobile equipment coating operations require the facility to utilize HVLP application equipment, or an equivalent applicator and coatings and cleaning materials/solvents that comply with the requirements of Rule 4612. Therefore, each of these motor vehicle and mobile equipment coating operations meet the definition of a CEU.

C-1080-9 (underbody motor vehicle coating operation):

This operation is for an underbody motor vehicle and mobile equipment coating operation. The District BACT clearinghouse does not currently have a guideline that covers underbody coating operations. Therefore, an achieved in practice BACT determination will be performed as a part of the evaluation for this project to demonstrate that the underbody coating operation is a CEU. Based on the clean emission unit determination for underbody coating operations included in Appendix E, achieved in practice BACT for this type of operation is the use of underbody coatings with a VOC content of 430 g/l (3.6 lb/gal) or less.

Scelzi Enterprises uses underbody coatings that have a VOC content of 430 g/l (3.6 lb/gal) or less. Therefore, the underbody coating operation can be considered a CEU.

BE Summary:

As discussed above, each of the units in the SLC being modified in this project can be considered CEUs. Therefore, the VOC BE can be set equal to the PE1 value for each unit.

VOC Baseline Emissions (lb/year)		
Permit	VOC PE1	VOC BE
C-1080-1-4	54,385	54,385
C-1080-2-5		
C-1080-4-2		
C-1080-7-2		
C-1080-9-2		
C-1080-11-0		
C-1080-12-0		

**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."

As shown above, this facility is not a major source for NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub> or CO emissions. Therefore, this project cannot constitute an SB 288 major modification for these pollutants.

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

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

Since the project's PE2 surpasses the SB 288 Major Modification Thresholds for VOC emissions, the Net Emissions Increase (NEI) will be compared to the SB 288 Major Modification thresholds 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 2018 and 2017 were 30,620 lb-VOC/year and 27,720 lb-VOC/year (see Appendix H). Therefore, the BAE =  $(30,620 + 27,720) \text{ lb-VOC/year} \div 2 = 29,170 \text{ lb-VOC/year}$ .

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

<b>SB 288 Major Modification Calculation and Determination</b>					
<b>Pollutant</b>	<b>PE2 (lb/year)</b>	<b>BAE (lb/yr)</b>	<b>NEI (lb/yr)</b>	<b>Thresholds (lb/yr)</b>	<b>SB 288 Major Modification?</b>
VOC	54,385	29,170	25,215	50,000	No

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

## 8. Federal Major Modification

As demonstrated above, this facility is not a major source for NO<sub>x</sub>, SO<sub>x</sub>, and PM<sub>10</sub> emissions. In addition, in accordance with Rule 2201, Section 3.18, there are no Federal Major Modification thresholds for CO emissions. Therefore, this project cannot constitute a Federal Major Modification and no further analysis is required for NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, and CO emissions.

However, this facility is a Major Source for VOC emissions. Therefore, further analysis is required to determine if this project is a Federal Major Modification for VOC.

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.

The determination of Federal Major Modification is based on a two-step test. For the first step, only the emission *increases* are counted. Emission decreases may not cancel out the increases for this determination.

### Step 1

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

$$\text{Emission Increase} = \text{PAE} - \text{BAE} - \text{UBC}$$

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

#### C-1080-1, -2, -4, -7, -9, and -11:

For these coating operations, there is no increase in design capacity or method of operation. Scelzi Enterprises is only proposing to convert the existing permitted daily VOC emission limit of 149.0 lb/day to an equivalent annual VOC emission limit of 54,385 lb/year. Therefore, there is no emission increase from these operations.

#### C-1080-12:

Scelzi Enterprises has indicated that they want the ability to use this coating operation up to its full potential to emit. Therefore, the PAE will be set equal to the post project annual PE2 value calculated above.

In accordance with the definitions in 40 CFR Part 51, Subpart I, *Review of New Sources and Modifications*, Section 165, BAE means the average rate at which the emissions unit actually emitted during any consecutive 24-month period. However, for new emission units, the BAE shall be equal to the unit's potential to emit. A new emission unit is defined as any emission unit which is newly constructed and which has existed for less than 2 years from the date such emissions unit first operated. Based on information in the District's permit database, this coating operation has only been in operation for 14 months and can still be considered new emission units. Thus, the BAE from this coating operation will be set equal to the unit's pre-project potential to emit (PE1).

Since this coating operation is still considered new emission units for federal major modification purposes, it does not have any UBC. Therefore, the UBC will be set equal to zero.

Therefore, the emission increase calculation is as follows:

$$\begin{aligned} \text{Project Emission Increase} &= \text{VOC PE2 lb/year} - \text{VOC PE1 lb/year} - 0 \text{ lb/year} \\ \text{Project Emission Increase} &= 54,385 \text{ lb/year} - 10,400 \text{ lb/year} - 0 \text{ lb/year} \end{aligned}$$

$$\text{Project Emission Increase} = 43,985 \text{ lb-VOC/year}$$

The project's combined total emission increases are compared to the Federal Major Modification Thresholds in the following table.

<b>Federal Major Modification Thresholds for Emission Increases</b>			
<b>Pollutant</b>	<b>Total Emissions Increases (lb/yr)</b>	<b>Thresholds (lb/yr)</b>	<b>Federal Major Modification?</b>
VOC*	43,985	0	Yes

\*If there is any emission increases in NO<sub>x</sub> or VOC, this project is a Federal Major Modification and no further analysis is required.

Since there is an increase in VOC emissions, this project constitutes a Federal Major Modification. Federal Offset quantities are calculated below.

**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 multiplied by the applicable federal offset ratio. There are no special calculations performed 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	$(5,120 + 3,620) \div 2 = 4,370$	54,385
C-1080-2-5	$(0 + 0) \div 2 = 0$	
C-1080-4-2	$(11,840 + 6,720) \div 2 = 9,280$	
C-1080-7-2	$(10,280 + 9,680) \div 2 = 9,980$	
C-1080-9-2	$(480 + 460) \div 2 = 470$	
C-1080-11-0	$(0 + 9,660) \div 2 = 4,830$	
C-1080-12-0	$(0 + 480) \div 2 = 240$	
<b>Total</b>	<b>29,170</b>	

VOC	Actual Emissions (lb/year)	Potential Emissions (lb/year)	Federal Offset Ratio	Emissions Change (lb/yr)
C-1080-1	29,170	54,385	1.5	25,215
C-1080-2				
C-1080-4				
C-1080-7				
C-1080-9				
C-1080-11				
C-1080-12				
<b>Net Emission Change (lb/year):</b>				<b>25,215</b>
<b>Federal Offset Quantity: (NEC * 1.5)</b>				<b>37,823</b>

### 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<sub>2</sub> (as a primary pollutant)
- SO<sub>2</sub> (as a primary pollutant)
- CO
- PM
- PM<sub>10</sub>

**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.

<b>PSD Major Source Determination: Potential to Emit (tons/year)</b>						
	<b>NO<sub>2</sub></b>	<b>VOC</b>	<b>SO<sub>2</sub></b>	<b>CO</b>	<b>PM</b>	<b>PM<sub>10</sub></b>
Total PE from New and Modified Units	1.3	27.2	0.04	1.1	14.6	14.6
PSD Major Source threshold	250	250	250	250	250	250
New PSD Major Source?	No	No	No	No	No	No

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 G.



## VIII. Compliance Determination

### Rule 2201 New and Modified Stationary Source Review Rule

#### A. Best Available Control Technology (BACT)

##### 1. BACT Applicability

Pursuant to District Rule 2201, Section 4.1, 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 Adjusted Increase in Permitted Emissions (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

As discussed in Section I above, there are no new emissions units associated with this project. Therefore BACT for new units with PE > 2 lb/day purposes is not triggered.

##### 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 is not triggered.

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

$$\text{AIPE} = \text{PE2} - \text{HAPE}$$

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)

$$\text{HAPE} = \text{PE1} \times (\text{EF2}/\text{EF1})$$

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

$$AIPE = PE2 - (PE1 * (EF2 / EF1))$$

C-1080-1, '-2, '-4, '-7, '-9, '-11 and '-12 (coating operations):

For each of these units, the EF2 = EF1. Therefore, the AIPE for each unit can be determined as PE2 – PE1.

VOC

Permit	VOC PE2 (lb/day)	VOC PE1 (lb/day)	AIPE (lb/day)
C-1080-1	149.0	149.0	0.0
C-1080-2	50.0	50.0	0.0
C-1080-4	149.0	149.0	0.0
C-1080-7	99.0	99.0	0.0
C-1080-9	149.0	149.0	0.0
C-1080-11	149.0	149.0	0.0
C-1080-12	149.0	40.0	109.0

As demonstrated above, the AIPE is greater than 2.0 lb/day for VOC emissions from unit C-1080-12. Therefore, BACT is triggered for VOC emissions from this modified emission unit.

PM<sub>10</sub>

Permit	PM <sub>10</sub> PE2 (lb/day)	PM <sub>10</sub> PE1 (lb/day)	AIPE (lb/day)
C-1080-1	19.0	50.0	-31.0
C-1080-2	19.0	14.5	4.5
C-1080-4	19.0	50.0	-31.0
C-1080-7	19.0	23.3	-4.3
C-1080-9	50.0	50.0	0.0
C-1080-11	19.0	5.4	13.6
C-1080-12	19.0	3.2	15.8

As demonstrated above, the AIPE is greater than 2.0 lb/day for PM<sub>10</sub> emissions units C-1080-2, '-11, and '-12. Therefore, BACT is triggered for PM<sub>10</sub> emissions from these three modified emission units.

C-1080-11 (paint booth heater):

As discussed above, Scelzi Enterprises is not proposing to modify the emission factors, burner rating or hours of operation of the existing paint booth heater serving this coating operation. Thus, EF2 = EF1 and PE2 = PE1 and the AIPE for each pollutant emitted by the paint booth heater will be 0.0 lb/day. Therefore, BACT is not triggered for AIPE purposes from the paint booth heater.

**d. SB 288/Federal Major Modification**

As discussed in Sections VII.C.7 and VII.C.8 above, this project does not constitute an SB 288, but does constitute a Federal Major Modification for VOC emissions. Therefore BACT is triggered for VOC emissions from units which have an increase in this project (C-1080-12-1).

**2. BACT Guideline**

C-1080-2, '-11, and '-12:

BACT Guideline 4.2.1 applies to automotive spray painting operations. Scelzi is proposing to modify an existing motor vehicle and mobile equipment coating operation as a part of this project. Therefore, BACT Guideline 4.2.1 is applicable to these modified motor vehicle and mobile equipment coating operations (BACT Guideline 4.2.1 included in Appendix C).

**3. Top-Down BACT Analysis**

C-1080-2, '-11, and '-12:

Per District Policy APR 1305, Section IX, "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. For source categories or classes covered in the BACT Clearinghouse, relevant information under each of the following steps may be simply cited from the Clearinghouse without further analysis."

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
- PM<sub>10</sub>: Spray booth with exhaust filters - 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 and a spray booth with exhaust filters achieving 95% control efficiency. Therefore, all BACT requirements are satisfied for units C-1080-2, '-11, and '-12.

The following conditions will be included on these three permits as a mechanism to ensure compliance with the BACT requirements:

- 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]
- Only high-volume low-pressure (HVLV) 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]
- Booth shall be equipped with dry filters achieving a PM<sub>10</sub> control efficiency of at least 95% by weight. [District Rule 2201]

## B. Offsets

### 1. Offset Applicability

Pursuant to District Rule 2201, Section 4.5, offset requirements shall be triggered on a pollutant by pollutant basis and shall be required if the SSPE2 equals 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 <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
SSPE2	2,628	75	29,199	2,208	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 facility is an existing Major Source for VOC emissions and the SSPE2 is greater than the offset thresholds for this pollutants. Therefore, offset calculations will be required for this project.

Per Sections 4.7.1 and 4.7.3, the quantity of offsets in pounds per year for NO<sub>x</sub> 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) =  $(\sum[PE2 - BE] + ICCE) \times DOR$ , 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, determined pursuant to Section 4.8

Therefore, offsets can be determined as follows for this project:

Offsets Required (lb/year) =  $([PE2 - BE] + ICCE) \times DOR$

Sum of PE2 (VOC)	= VOC SLC
	= 54,385 lb-VOC/year
Sum of BE (VOC)	= VOC SLC
	= 54,385 lb-VOC/year
ICCE	= 0 lb/year

Therefore:

VOC Offsets Required for Project (lb/year) =  $[(54,385 - 54,385 + 0) \times DOR]$

VOC Offsets Required for Project (lb/year) =  $0 \times DOR$

VOC Offsets Required for Project (lb/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

Pursuant to District Rule 2201, Section 5.4, 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 SSPE 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 Sections VII.C.7 and VII.C.8, this project does not trigger an SB 288, however, it does trigger a Federal Major Modification. Therefore, public noticing for Federal Major Modification purposes is required.

**b. PE > 100 lb/day**

Applications which include a new emissions unit with a PE greater than 100 pounds during any one day for any pollutant will trigger public noticing requirements. There are no new emissions units associated with this project. Therefore public noticing is not required for this project for PE > 100 lb/day.

**c. Offset Threshold**

Pursuant to District Rule 2201, Section 4.5.3, offset requirements shall be triggered on a pollutant-by-pollutant basis, unless exempted pursuant to Section 4.6, offsets shall be required if the post-project Stationary Source Potential to Emit (SSPE2) equals or exceeds specific threshold levels.

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

Offset Thresholds				
Pollutant	SSPE1 (lb/year)	SSPE2 (lb/year)	Offset Threshold	Public Notice Required?
NO <sub>x</sub>	2,628	2,628	20,000 lb/year	No
SO <sub>x</sub>	75	75	54,750 lb/year	No
PM <sub>10</sub>	29,199	29,199	29,200 lb/year	No
CO	2,208	2,208	200,000 lb/year	No
VOC	54,385	54,385	20,000 lb/year	No

As detailed above, there were 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.

<b>SSIPE Public Notice Thresholds</b>					
<b>Pollutant</b>	<b>SSPE2 (lb/year)</b>	<b>SSPE1 (lb/year)</b>	<b>SSIPE (lb/year)</b>	<b>SSIPE Public Notice Threshold</b>	<b>Public Notice Required?</b>
NO <sub>x</sub>	2,628	2,628	0	20,000 lb/year	No
SO <sub>x</sub>	75	75	0	20,000 lb/year	No
PM <sub>10</sub>	29,199	29,199	0	20,000 lb/year	No
CO	2,208	2,208	0	20,000 lb/year	No
VOC	54,385	54,385	0	20,000 lb/year	No

As demonstrated above, the SSIPEs for all pollutants were 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 the project triggering a Federal Major Modification and being a Title V permit significant modification. Therefore, public notice documents will be submitted to the California Air Resources Board (CARB), EPA, and a public notice will be published in the local newspaper of general circulation prior to the issuance of the ATCs.

**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:

C-1080-1:

- The emissions from this unit shall not exceed either of the following limits: 149.0 lb-VOC/day or 19.0 lb-PM<sub>10</sub>/day. [District Rule 2201]

C-1080-2:

- The emissions from the truck bed liner coating operation shall not exceed either of the following limits: 0.7 lb-VOC/day or 3.0 lb-PM<sub>10</sub>/day. [District Rule 2201]
- The total emissions from this unit shall not exceed either of the following limits: 50.0 lb-VOC/day or 19.0 lb-PM<sub>10</sub>/day. [District Rule 2201]

C-1080-4:

- The emissions from this unit shall not exceed either of the following limits: 149.0 lb-VOC/day or 19.0 lb-PM<sub>10</sub>/day. [District Rule 2201]

C-1080-7:

- The emissions from this unit shall not exceed either of the following limits: 99.0 lb-VOC/day or 19.0 lb-PM<sub>10</sub>/day. [District Rule 2201]

C-1080-9:

- The emissions from this unit shall not exceed either of the following limits: 149.0 lb-VOC/day or 50.0 lb-PM<sub>10</sub>/day. [District Rule 2201]
- PM<sub>10</sub> emissions from each coating shall be calculated as follows: PM<sub>10</sub> emissions = coating density (lb/gallon) x coating solids content (%) x usage (gallons/day) x 0.55<sup>(5)</sup>. Total PM<sub>10</sub> emissions is the sum of PM<sub>10</sub> emissions from all coatings used and the booth heater. [District Rule 2201]

C-1080-11:

- The total emissions from this unit shall not exceed either of the following limits: 149.0 lb-VOC/day or 19.0 lb-PM<sub>10</sub>/day. [District Rule 2201]
- Emissions from the burner shall not exceed any of the following limits: 0.10 lb-NO<sub>x</sub>/MMBtu, 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, 0.084 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 2201]
- The booth heater shall only be fired on PUC quality natural gas. [District Rule 2201]

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<sup>(5)</sup> Based on information taken from project C-1092065, the original permitting action for this underbody coating operation, this operation does not take place inside of a paint spray booth with dry exhaust filters and the transfer efficiency of the airless application equipment is 45%. Therefore, this calculation conversion factor was determined using the 1 – Transfer Efficiency (1 – 0.45 = 0.55).



C-1080-12:

- The emissions from this unit shall not exceed either of the following limits: 149.0 lb-VOC/day or 19.0 lb-PM<sub>10</sub>/day. [District Rule 2201]

All Units:

Additionally, as a mechanism to demonstrate ongoing compliance with the proposed facility-wide VOC and PM<sub>10</sub> emissions limits and how the facility is expected to calculate and compliance with those emissions limits, the following conditions will be included on each permit:

- Facility-wide emissions, in any rolling 12-month period, shall not exceed either of the following limits: 54,385 lb-VOC/year or 29,199 lb-PM<sub>10</sub>/year. [District Rule 2201]
- VOC emissions from each coating and/or solvent used shall be calculated as follows: VOC emissions = VOC content (lb/gallon) as applied x usage (gallon/day or gallon/year). Total VOC emissions is the sum of VOC emissions from all coatings and/or solvents used and from the booth heater. [District Rule 2201]

All Units (except underbody coating operation under unit C-1080-9):

- PM<sub>10</sub> emissions from each coating used shall be calculated as follows: PM<sub>10</sub> emissions = coating density (lb/gallon) x coating solids content (%) x usage (gallons/day or gallons/year) x 0.0125<sup>(6)</sup>. Total PM<sub>10</sub> emissions is the sum of PM<sub>10</sub> emissions from all coatings used and the booth heater. [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**

No monitoring is required to demonstrate compliance with Rule 2201.

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<sup>(6)</sup> Calculation conversion factor determined using the HVLP application equipment transfer efficiency and the spray booth dry filter removal efficiency:  $(1 - 75\%) \times (1 - 95\%) = 0.0125$ . This calculation conversion factor applies to all of the coating operations at this facility that are performed using HVLP, or equivalent, application equipment and that are performed inside of a paint spray booth with dry exhaust filters. Note that as discussed above, a different calculation conversion factor is utilized for the undercoating operation referenced on permit C-1080-9.

### 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 Units:

- On a daily basis, the permittee shall calculate and record the following: total daily VOC emissions (lb/day) and total daily PM<sub>10</sub> emissions (lb/day). [District Rules 1070 and 2201]
- On a monthly basis, the permittee shall calculate and record the VOC and PM<sub>10</sub> emissions, in pounds, from this unit for the prior calendar month. [District Rules 1070 and 2201]

In addition, in order for the applicant to demonstrate ongoing compliance with their facility-wide annual VOC and PM<sub>10</sub> emission limits, the following rolling 12-month records will be required for each unit at the facility.

- On a monthly basis, the permittee shall calculate and record the facility-wide VOC and PM<sub>10</sub> emissions in pounds for the rolling 12-month period. The facility-wide VOC and PM<sub>10</sub> emissions shall be calculated by summing the VOC and PM<sub>10</sub> emissions from the previous 12 months from every permitted unit at this facility. [District Rule 1070]

### 4. Reporting

No reporting is required to demonstrate compliance with Rule 2201.

### F. Ambient Air Quality Analysis (AAQA)

Section 4.14 of District Rule 2201 requires that an AAQA 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 F of this document for the AAQA summary sheet.

The proposed location is in an attainment area for NO<sub>x</sub>, CO, and SO<sub>x</sub>. As shown by the AAQA summary sheet the proposed equipment will not cause a violation of an air quality standard for NO<sub>x</sub>, CO, or SO<sub>x</sub>.

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

### **Rule 2410 Prevention of Significant Deterioration**

The prevention of significant deterioration (PSD) program is a construction permitting program for new major stationary sources and major modifications to existing major stationary sources located in areas classified as attainment or in areas that are unclassifiable for any criteria air pollutant.

As shown in Section VII. C. 9. above, this project does not result in a new PSD major source or PSD major modification. Therefore, this project is not subject to the requirements of Rule 2410 and 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. Section 3.29 defines a significant permit modification 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 Federal Major Modification, as defined in Rule 2201<sup>(3)</sup>. As discussed above, this project triggers a Federal Major Modification. As a result, the proposed project constitutes a Significant Modification to the Title V Permit pursuant to Section 3.29.

As discussed above, the facility has applied for 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 facility may construct/operate under the ATCs upon submittal of the Title V administrative amendment application. The following conditions will be included on each ATC and will assure compliance with the requirements of Rule 2520:

- 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]
- 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]

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<sup>(3)</sup> District Rule 2520, Section 3.20.5 actually states that a project shall not constitute a Title I modification, as defined in Rule 2201. In a previous version of Rule 2201, the term Title I modification was replaced with Federal Major Modification. However, at that time, the terminology in Rule 2520 was not updated to reflect the new Rule 2201 terms. Therefore, even though Rule 2520 references that a project triggering a Title I modification does not qualify as a Title V minor modification, it will be replaced with the term Federal Major Modification for the purposes of this project.

### **Rule 4001 New Source Performance Standards (NSPS)**

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.

40 CFR 60, Subpart MM applies to Original Equipment Manufacturers (OEM) that apply coatings at automobile or light-duty truck assembly plants. Scelzi Enterprises is not a vehicle assembly plant. They receive pre-fabricated truck cabs already on a frame and build the rear portion of the truck in accordance with customer specifications. Therefore, this facility is not considered an OEM assembly plant, and the requirements of this subpart are not applicable.

No other subparts of 40 CFR Part 60 are applicable to motor vehicle coating operations.

### **Rule 4002 National Emission Standards for Hazardous Air Pollutants (NESHAPs)**

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.

The requirements of 40 CFR Part 63, Subpart IIII (National Emission Standards for Hazardous Air Pollutants: Surface Coating of Automobiles and Light-Duty Trucks) are applicable to facilities that operate a Major Source of hazardous air pollutant (HAP) emissions and that apply topcoat to new automobile or new light-duty truck bodies or body parts for new automobiles or new light-duty trucks. Scelzi Enterprises does not manufacture new light-duty trucks at this facility. They receive new light-duty trucks from the original equipment manufacturer and upfit components on to the truck frame or body. Therefore, the requirements of Subpart IIII do not apply to this facility. 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 that 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. The following condition will be included on all permits as a mechanism to enforce compliance:

- 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]

#### **Rule 4101 Visible Emissions**

Rule 4101 states that no person shall discharge into the atmosphere emissions of any air contaminant aggregating more than 3 minutes in any hour which is as dark as or darker than Ringelmann 1 (or 20% opacity). Visible emissions are not expected as a result of these wine storage operations. Therefore, compliance with this rule is expected. Compliance with the requirements of this rule is assured by the following condition, currently included as condition 22 on Scelzi's facility wide permit C-1080-0-1:

- 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]

## Rule 4102 Nuisance

Section 4.0 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 these operations, provided the equipment is well maintained. Therefore, compliance with this rule is expected. Compliance with the requirements of this rule is ensured by the following condition, currently included as condition 41 on Scelzi's facility wide permit C-1080-0-1:

- 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.

A health risk assessment (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 health risks from the proposed project.

The results of the HRA performed for this project are shown below:

Units*	Prioritization Score	Acute Hazard Index	Chronic Hazard Index	Maximum Individual Cancer Risk	T-BACT Required	Special Permit Requirements
9-4	0.34	0.06	NA**	NA**	No	Yes
12-1	1.11	0.00	NA**	NA**	No	Yes
Project Totals	>1	0.07	NA**	NA**		
Facility Totals	>1	0.28	0.88	6.02E-08		

\* In previous projects, for units that did not have existing permit specific daily emission limits, previous HRA's already modeled those units at the full VOC SLC value of 149.0 lb/day. Therefore, for HRA purposes, it was determined that there is no increase in emissions associated with this project for units C-1080-1, '-2, '-4, '-7, and '-11. In addition, the increases in daily PM<sub>10</sub> emissions from units '-2 and '-11 are being made to create more consistent limits for all of Scelzi's coating permits. The increase in PM<sub>10</sub> is not attributed to an increase in the amount of coating used. Since there is no increase in the amount of coating usage, there is no increase in the health risk associated with these units. Therefore, these units have not been included in the HRA results.

\*\* Chronic Hazard Index and Cancer risk were not calculated since the emission increase was only on a daily basis.

## 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 by the HRA Summary in Appendix F of this report, the emissions increases for this project was determined to be less than significant.

The following conditions will be included on permits C-1080-9-4 and '-12-1 as a mechanism to ensure compliance with the requirements of the HRA:

C-1080-9-4 and '-12-1:

- 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]

C-1080-12-1:

- 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. [District Rule 4102]

**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.

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

Assuming 100% of PM is PM<sub>10</sub>:

C-1080-1:

Exhaust Gas Flow = 28,410 scfm per project C-1011758

$$\begin{aligned} \text{PM Conc (gr/scf)} &= [(19.0 \text{ lb/day}) \times (7,000 \text{ gr/lb})] \div [(28,410 \text{ ft}^3/\text{min}) \times (60 \text{ min/hr}) \times (24 \text{ hr/day})] \\ \text{PM Conc} &= 0.003 \text{ gr/scf} \end{aligned}$$

C-1080-2:

Exhaust Gas Flow = 28,410 scfm per RMR summary for project C-1101157

$$\begin{aligned} \text{PM Conc (gr/scf)} &= [(19.0 \text{ lb/day}) \times (7,000 \text{ gr/lb})] \div [(28,410 \text{ ft}^3/\text{min}) \times (60 \text{ min/hr}) \times (24 \text{ hr/day})] \\ \text{PM Conc} &= 0.003 \text{ gr/scf} \end{aligned}$$

C-1080-4:

Exhaust Gas Flow = 13,040 scfm per project C-1101157  
PM Conc (gr/scf) = [(19.0 lb/day) x (7,000 gr/lb)] ÷ [(13,040 ft<sup>3</sup>/min) x (60 min/hr) x (24 hr/day)]  
PM Conc = 0.007 gr/scf

C-1080-7:

Exhaust Gas Flow = 36,000 scfm per project C-1063643  
PM Conc (gr/scf) = [(19.0 lb/day) x (7,000 gr/lb)] ÷ [(36,000 ft<sup>3</sup>/min) x (60 min/hr) x (24 hr/day)]  
PM Conc = 0.003 gr/scf

C-1080-9:

The underbody coating operation takes place outside of a paint booth and is not equipped with any exhaust fans. Therefore, there is no exhaust flow and the requirements of this rule do not apply to this operation.

C-1080-11:

Exhaust Gas Flow = 24,460 scfm  
PM Conc (gr/scf) = [(19.0 lb/day) x (7,000 gr/lb)] ÷ [(24,460 ft<sup>3</sup>/min) x (60 min/hr) x (24 hr/day)]  
PM Conc = 0.004 gr/scf

C-1080-12:

Exhaust Gas Flow = 24,000 scfm  
PM Conc (gr/scf) = [(19.0 lb/day) x (7,000 gr/lb)] ÷ [(24,000 ft<sup>3</sup>/min) x (60 min/hr) x (24 hr/day)]  
PM Conc = 0.004 gr/scf

Therefore, for each of these coating operations, except for unit C-1080-9 which the rule does not apply to as described above, is expected to be in compliance with the requirements of this rule. The following condition will be added to each permit as a mechanism to enforce compliance:

- 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<sub>2</sub>, NO<sub>2</sub>, 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:

The paint booth heater associated with the coating operation under permit C-1080-11 is the only fuel burning unit at the facility. Dividing the previously calculated daily PE by the 24 hr/day operating schedule produces the hourly emission rates shown in the following table:

<b>District Rule 4301 Limits</b>			
<b>Pollutant</b>	<b>NO<sub>2</sub></b>	<b>Total PM</b>	<b>SO<sub>2</sub></b>
C-1080-11	0.3	0.021	0.008
Rule Limit (lb/hr)	140	10	200

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

**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:

<b>Table 1 - Rule 4612 Coating VOC Limits</b>	
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 condition will be listed on the proposed ATCs as a mechanism to ensure compliance:

- 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.

C-1080-9 (underbody coating operation):

As discussed in the application review for the original permitting action for this permit unit, this operation applies underbody coating to help protect the truck frames and components. This operation meets the definition of underbody coating in Section 3.42 of this rule. Therefore, the applicator requirements of Section 5.7 are not applicable to the underbody coating operation.

C-1080-1, '-2, '-4, '-7, '-11, and '-12 (motor vehicle coating operations):

Except for the underbody coating operation, all of the other coating operations at this facility are performed utilizing HVLP, or equivalent, application equipment. This application method complies with Section 5.7 of Rule 4612. The following conditions will be listed on the proposed permits as a mechanism to ensure compliance:

- 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]

- 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 listed on the proposed ATCs as a mechanism to ensure compliance with the requirements of Sections 5.8 and 5.9:

- 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]
- 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]
- 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 listed on the permits as a mechanism to ensure compliance with the requirements of Section 6.0:

- 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]
- 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]
- 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, this operation is in compliance with the requirements of this rule.

### **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<sub>2</sub>, 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:

$$\text{Volume SO}_2 = \frac{n RT}{P}$$

With:

N = moles SO<sub>2</sub>

T (Standard Temperature) = 60°F = 520°R

P (Standard Pressure) = 14.7 psi

R (Universal Gas Constant) =  $\frac{10.73 \text{ psi} \cdot \text{ft}^3}{\text{lb} \cdot \text{mol} \cdot ^\circ\text{R}}$

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

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

Natural Gas Combustion:

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

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

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 or will prepare an environmental review document for the project. Thus the District is the Lead Agency for this project.

Coating operations do not emit greenhouse gas emissions. The only equipment being modified within this project that has the potential to generate greenhouse gases is the paint booth heater under permit C-1080-11. The applicant is not proposing to modify the existing paint booth heater, its burner rating, or its hours of operation as a part of this project. Therefore, the proposed project does not result in an increase in project specific greenhouse gas emissions. The District therefore concludes that the project would have a less than cumulatively significant 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 successful NSR public noticing and EPA noticing periods, issue ATCs C-1080-1-6, '-2-7, '-4-4, '-7-4, '-9-4, '-11-1, and '-12-1 subject to the permit conditions on the attached draft ATCs in Appendix A.

**X. Billing Information**

<b>Annual Permit Fees</b>			
<b>Permit Number</b>	<b>Fee Schedule</b>	<b>Fee Description</b>	<b>Annual Fee</b>
C-1080-1-6	3020-01-A	7 electrical hp	\$102
C-1080-2-7	3020-01-A	10 electrical hp	\$102
C-1080-4-4	3020-01-A	4 electrical hp	\$102
C-1080-7-4	3020-01-A	3 electrical hp	\$102
C-1080-9-4	3020-01-A	10 electrical hp	\$102
C-1080-11-1	3020-02-F	3.0 MMBtu/hr Booth Heater	\$698
C-1080-12-1	3020-01-C	87.5 electrical hp	\$228

**Appendixes**

- A: Draft ATCs C-1080-1-6, '-2-7, '-4-4, '-7-4, '-9-4, '-11-1, and '-12-1
- B: Current Permits C-1080-1-4, '-2-5, '-4-2, '-7-2, '-9-2, '-11-0, and '-12-0
- C: BACT Guideline 4.2.1
- D: Top-Down BACT Analysis for Units C-1080-2, '-11 and '-12
- E: Clean Emission Unit Determination for Unit C-1080-9
- F: RMR and AAQA Summaries
- G: Quarterly Net Emissions Change
- H: Emissions Inventory Data for 2017 and 2018

## **Appendix A**

Draft ATCs C-1080-1-6, '-2-7, '-4-4, '-7-4,  
'-9-4, '-11-1, and '-12-1

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**DRAFT**  
ISSUANCE DATE: DRAFT

**PERMIT NO:** C-1080-1-6

**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: CONVERT EXISTING DAILY FACILITY-WIDE VOC EMISSION LIMIT OF 149 LB/DAY TO AN EQUIVALENT ANNUAL FACILITY-WIDE VOC EMISSION LIMIT OF 54,385 LB/YEAR, ESTABLISH A PERMIT SPECIFIC VOC DAILY EMISSION LIMIT OF 149 LB/DAY, AND LOWER PM10 EMISSION LIMIT FROM 50.0 LB/DAY TO 19.0 LB/DAY

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

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.

Samir Sheikh, Executive Director / APCO

**Arnaud Marjollet, Director of Permit Services**

C-1080-1-6 : May 13 2019 10:29AM - BROWND : Joint Inspection NOT Required

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. 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
8. 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]
9. 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
10. 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
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), 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
12. The emissions from this unit shall not exceed either of the following limits: 149.0 lb-VOC/day or 19.0 lb-PM10/day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Facility-wide emissions, in any rolling 12-month period, shall not exceed either of the following limits: 54,385 lb-VOC/year or 29,199 lb-PM10/year. [District Rule 2201] Federally Enforceable Through Title V Permit
14. VOC emissions from each coating and/or solvent used shall be calculated as follows: VOC emissions = VOC content (lb/gallon) as applied x usage (gallon/day or gallon/year). Total VOC emissions is the sum of VOC emissions from all coatings and/or solvents used. [District Rule 2201] Federally Enforceable Through Title V Permit
15. PM10 emissions from each coating used shall be calculated as follows: PM10 emissions = coating density (lb/gallon) x coating solids content (%) x usage (gallons/day or gallons/year) x 0.0125. Total PM10 emissions is the sum of PM10 emissions from all coatings used. [District Rule 2201] Federally Enforceable Through Title V Permit
16. On a daily basis, the permittee shall calculate and record the following: total daily VOC emissions (lb/day) and total daily PM10 emissions (lb/day). [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
17. On a monthly basis, the permittee shall calculate and record the VOC and PM10 emissions, in pounds, from this unit for the prior calendar month. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
18. On a monthly basis, the permittee shall calculate and record the facility-wide VOC and PM10 emissions, in pounds, for the rolling 12-month period. The facility-wide VOC and PM10 emissions shall be calculated by summing the VOC and PM10 emissions from the previous 12 months from every permitted unit at this facility. [District Rules 1070 and 2201] 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. 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] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: DRAFT  
**DRAFT**

**PERMIT NO:** C-1080-2-7

**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-FIRED BOOTH HEATER (LESS THAN 20.0 MMBTU/DAY HEAT INPUT); CONVERT EXISTING DAILY FACILITY-WIDE VOC EMISSION LIMIT OF 149.0 LB/DAY TO AN EQUIVALENT ANNUAL FACILITY-WIDE VOC EMISSION LIMIT OF 54,385 LB/YEAR, INCREASE THE PERMIT SPECIFIC PM10 EMISSION LIMIT FROM 14.5 LB/DAY TO 19.0 LB/DAY, AND REMOVE PERMIT EXEMPT 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. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit
5. Booth shall be equipped with dry filters achieving a PM10 control efficiency of at least 95% by weight. [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.

Samir Sheikh, Executive Director / APCO

**Arnaud Marjolle, Director of Permit Services**

C-1080-2-7 : Jun 17 2019 2:03PM - BROWND : Joint Inspection NOT Required

6. 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
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]
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. The emissions from the truck bed liner coating operation shall not exceed either of the following limits: 0.7 lb-VOC/day or 3.0 lb-PM10/day. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The total emissions from this unit shall not exceed either of the following limits: 50.0 lb-VOC/day or 19.0 lb-PM10/day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Facility-wide emissions, in any rolling 12-month period, shall not exceed either of the following limits: 54,385 lb-VOC/year or 29,199 lb-PM10/year. [District Rule 2201] Federally Enforceable Through Title V Permit
16. VOC emissions from each coating and/or solvent used shall be calculated as follows: VOC emissions = VOC content (lb/gallon) as applied x usage (gallon/day or gallon/year). Total VOC emissions is the sum of VOC emissions from all coatings and/or solvents used. [District Rule 2201] Federally Enforceable Through Title V Permit
17. PM10 emissions from each coating used shall be calculated as follows: PM10 emissions = coating density (lb/gallon) x coating solids content (%) x usage (gallons/day or gallons/year) x 0.0125. Total PM10 emissions is the sum of PM10 emissions from all coatings used. [District Rule 2201] Federally Enforceable Through Title V Permit
18. On a daily basis, the permittee shall calculate and record the following: total daily VOC emissions (lb/day) and total daily PM10 emissions (lb/day). [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
19. On a monthly basis, the permittee shall calculate and record the VOC and PM10 emissions, in pounds, from this unit for the prior calendar month. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE



20. On a monthly basis, the permittee shall calculate and record the facility-wide VOC and PM10 emissions, in pounds, for the rolling 12-month period. The facility-wide VOC and PM10 emissions shall be calculated by summing the VOC and PM10 emissions from the previous 12 months from every permitted unit at this facility. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
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. 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

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San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**ISSUANCE DATE: DRAFT**

**PERMIT NO:** C-1080-4-4

**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: CONVERT EXISTING DAILY FACILITY-WIDE VOC EMISSION LIMIT OF 149.0 LB/DAY TO AN EQUIVALENT ANNUAL FACILITY-WIDE VOC EMISSION LIMIT OF 54,385 LB/YEAR, ESTABLISH A PERMIT SPECIFIC VOC DAILY EMISSION LIMIT OF 149.0 LB/DAY, AND LOWER PM10 EMISSION LIMIT FROM 50.0 LB/DAY TO 19.0 LB/DAY

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

Samir Sheikh, Executive Director / APCO

Arnaud Marjolle, Director of Permit Services

C-1080-4-4 : May 13 2019 10:29AM -- BROWND : Joint Inspection NOT Required

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. 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
8. 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]
9. 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
10. 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
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), 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
12. The emissions from this unit shall not exceed either of the following limits: 149.0 lb-VOC/day or 19.0 lb-PM10/day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Facility-wide emissions, in any rolling 12-month period, shall not exceed either of the following limits: 54,385 lb-VOC/year or 29,199 lb-PM10/year. [District Rule 2201] Federally Enforceable Through Title V Permit
14. VOC emissions from each coating and/or solvent used shall be calculated as follows: VOC emissions = VOC content (lb/gallon) as applied x usage (gallon/day or gallon/year). Total VOC emissions is the sum of VOC emissions from all coatings and/or solvents used. [District Rule 2201] Federally Enforceable Through Title V Permit
15. PM10 emissions from each coating used shall be calculated as follows: PM10 emissions = coating density (lb/gallon) x coating solids content (%) x usage (gallons/day or gallons/year) x 0.0125(2). Total PM10 emissions is the sum of PM10 emissions from all coatings used and the booth heater. [District Rule 2201] Federally Enforceable Through Title V Permit
16. On a daily basis, the permittee shall calculate and record the following: total daily VOC emissions (lb/day) and total daily PM10 emissions (lb/day). [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
17. On a monthly basis, the permittee shall calculate and record the VOC and PM10 emissions, in pounds, from this unit for the prior calendar month. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

18. On a monthly basis, the permittee shall calculate and record the facility-wide VOC and PM10 emissions, in pounds, for the rolling 12-month period. The facility-wide VOC and PM10 emissions shall be calculated by summing the VOC and PM10 emissions from the previous 12 months from every permitted unit at this facility. [District Rules 1070 and 2201] 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
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. 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

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San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**DRAFT**  
ISSUANCE DATE: DRAFT

**PERMIT NO:** C-1080-7-4

**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: CONVERT EXISTING DAILY FACILITY-WIDE VOC EMISSION LIMIT OF 149.0 LB/DAY TO AN EQUIVALENT ANNUAL FACILITY-WIDE VOC EMISSION LIMIT OF 54,385 LB/YEAR AND LOWER PM10 EMISSION LIMIT FROM 23.3 LB/DAY TO 19.0 LB/DAY

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

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.

Samir Sheikh, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services

C-1080-7-4 : May 13 2019 10:29AM - BROWND : Joint Inspection NOT Required

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. 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
8. 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]
9. 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
10. 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
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), 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
12. The emission rates from this unit shall not exceed either of the following limits: 99.0 lb-VOC/day or 19.0 lb-PM10/day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Facility-wide emissions, in any rolling 12-month period, shall not exceed either of the following limits: 54,385 lb-VOC/year or 29,199 lb-PM10/year. [District Rule 2201] Federally Enforceable Through Title V Permit
14. VOC emissions from each coating and/or solvent used shall be calculated as follows: VOC emissions = VOC content (lb/gallon) as applied x usage (gallon/day or gallon/year). Total VOC emissions is the sum of VOC emissions from all coatings and/or solvents used. [District Rule 2201] Federally Enforceable Through Title V Permit
15. PM10 emissions from each coating used shall be calculated as follows: PM10 emissions = coating density (lb/gallon) x coating solids content (%) x usage (gallons/day or gallons/year) x 0.0125(2). Total PM10 emissions is the sum of PM10 emissions from all coatings used. [District Rule 2201] Federally Enforceable Through Title V Permit
16. On a daily basis, the permittee shall calculate and record the following: total daily VOC emissions (lb/day) and total daily PM10 emissions (lb/day). [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
17. On a monthly basis, the permittee shall calculate and record the VOC and PM10 emissions, in pounds, from this unit for the prior calendar month. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
18. On a monthly basis, the permittee shall calculate and record the facility-wide VOC and PM10 emissions, in pounds, for the rolling 12-month period. The facility-wide VOC and PM10 emissions shall be calculated by summing the VOC and PM10 emissions from the previous 12 months from every permitted unit at this facility. [District Rules 1070 and 2201] 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. 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

DRAFT

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**DRAFT**  
ISSUANCE DATE: DRAFT

**PERMIT NO:** C-1080-9-4

**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: REMOVE ANNUAL VOC EMISSION LIMIT OF 10,400 LB/YEAR, CONVERT EXISTING DAILY FACILITY-WIDE VOC EMISSION LIMIT OF 149.0 LB/DAY TO AN EQUIVALENT ANNUAL FACILITY-WIDE VOC EMISSION LIMIT OF 54,385 LB/YEAR, AND ESTABLISH A PERMIT SPECIFIC VOC DAILY EMISSION LIMIT OF 149.0 LB/DAY

**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. 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
4. 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]
5. 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

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.

Samir Sheikh, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services

C-1080-9-4 : May 13 2019 10:31AM - BROWND : Joint Inspection NOT Required



6. 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
7. 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
8. The emissions from this unit shall not exceed either of the following limits: 149.0 lb-VOC/day or 50.0 lb-PM10/day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Facility-wide emissions, in any rolling 12-month period, shall not exceed either of the following limits: 54,385 lb-VOC/year or 29,199 lb-PM10/year. [District Rule 2201] Federally Enforceable Through Title V Permit
10. VOC emissions from each coating and/or solvent used shall be calculated as follows: VOC emissions = VOC content (lb/gallon) as applied x usage (gallon/day or gallon/year). Total VOC emissions is the sum of VOC emissions from all coatings and/or solvents used. [District Rule 2201] Federally Enforceable Through Title V Permit
11. PM10 emissions from each coating shall be calculated as follows: PM10 emissions = coating density (lb/gallon) x coating solids content (%) x usage (gallons/day) x 0.55. Total PM10 emissions is the sum of PM10 emissions from all coatings used. [District Rule 2201] Federally Enforceable Through Title V Permit
12. On a daily basis, the permittee shall calculate and record the following: total daily VOC emissions (lb/day) and total daily PM10 emissions (lb/day). [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
13. On a monthly basis, the permittee shall calculate and record the VOC and PM10 emissions, in pounds, from this unit for the prior calendar month. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
14. On a monthly basis, the permittee shall calculate and record the facility-wide VOC and PM10 emissions, in pounds, for the rolling 12-month period. The facility-wide VOC and PM10 emissions shall be calculated by summing the VOC and PM10 emissions from the previous 12 months from every permitted unit at this facility. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
15. 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
16. 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
17. 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
18. 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

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San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**ISSUANCE DATE: DRAFT**

**PERMIT NO:** C-1080-11-1

**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 A PAINT SPRAY BOOTH WITH DRY EXHAUST FILTERS AND A 3.0 MMBTU/HR NATURAL GAS-FIRED BOOTH HEATER: CONVERT EXISTING DAILY FACILITY-WIDE VOC EMISSION LIMIT OF 149.0 LB/DAY TO AN EQUIVALENT ANNUAL FACILITY-WIDE VOC EMISSION LIMIT OF 54,385 LB/YEAR, ESTABLISH A PERMIT SPECIFIC VOC DAILY EMISSION LIMIT OF 149.0 LB/DAY, AND INCREASE THE PM10 EMISSION LIMIT FROM 5.4 LB/DAY TO 19.0 LB/DAY

**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. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit
5. Booth shall be equipped with dry filters achieving a PM10 control efficiency of at least 95% by weight. [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.

Samir Sheikh, Executive Director / APCO

Arnaud Marjollet, Director of Permit Services  
C-1080-11-1 : May 29 2019 3:18PM - BROWND : Joint Inspection NOT Required

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. 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]
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. The total emissions from this unit shall not exceed either of the following limits: 149.0 lb-VOC/day or 19.0 lb-PM10/day. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The booth heater shall only be fired on PUC quality natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Emissions from the booth heater shall not exceed any of the following limits: 0.10 lb-NO<sub>x</sub>/MMBtu, 0.00285 lb-SO<sub>x</sub>/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
16. Facility-wide emissions, in any rolling 12-month period, shall not exceed either of the following limits: 54,385 lb-VOC/year or 29,199 lb-PM10/year. [District Rule 2201] Federally Enforceable Through Title V Permit
17. VOC emissions from each coating and/or solvent used shall be calculated as follows: VOC emissions = VOC content (lb/gallon) as applied x usage (gallon/day or gallon/year). VOC emissions from the booth heater shall be calculated as follows: VOC emissions = hours of operation (hrs/day or hrs/year) x 0.0165. Total 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

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CONDITIONS CONTINUE ON NEXT PAGE

18. PM10 emissions from each coating used shall be calculated as follows:  $\text{PM10 emissions} = \text{coating density (lb/gallon)} \times \text{coating solids content (\%)} \times \text{usage (gallons/day or gallons/year)} \times 0.0125$ . PM10 emissions from the booth heater shall be calculated as follows:  $\text{PM10 emissions} = \text{hours of operation (hrs/day or hrs/year)} \times 0.0228$ . Total PM10 emissions is the sum of PM10 emissions from all coatings used and the booth heater. [District Rule 2201] Federally Enforceable Through Title V Permit
19. On a daily basis, the permittee shall calculate and record the following: total daily VOC emissions (lb/day) and total daily PM10 emissions (lb/day). [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
20. On a monthly basis, the permittee shall calculate and record the VOC and PM10 emissions, in pounds, from this unit for the prior calendar month. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
21. On a monthly basis, the permittee shall calculate and record the facility-wide VOC and PM10 emissions, in pounds, for the rolling 12-month period. The facility-wide VOC and PM10 emissions shall be calculated by summing the VOC and PM10 emissions from the previous 12 months from every permitted unit at this facility. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
22. 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
23. 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
24. 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
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

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San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**DRAFT**  
ISSUANCE DATE: DRAFT

**PERMIT NO:** C-1080-12-1

**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 A PAINT SPRAY BOOTH WITH DRY EXHAUST FILTERS AND A 3.0 MMBTU/HR NATURAL GAS-FIRED BOOTH HEATER: INCREASE DAILY VOC EMISSION LIMIT OF 40.0 LB/DAY TO 149.0 LB/DAY, REMOVE PERMIT SPECIFIC ANNUAL VOC EMISSION LIMIT, CONVERT EXISTING DAILY FACILITY-WIDE VOC EMISSION LIMIT OF 149.0 LB/DAY TO AN EQUIVALENT ANNUAL FACILITY-WIDE VOC EMISSION LIMIT OF 54,385 LB/YEAR, AND INCREASE THE PM10 EMISSION LIMIT FROM 3.2 LB/DAY TO 19.0 LB/DAY

**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. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. {1898} 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]
5. 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.

Samir Sheikh, Executive Director / APCO

**Arnaud Marjollet, Director of Permit Services**

C-1080-12-1 : May 29 2019 3:18PM - BROWND : Joint Inspection NOT Required

6. Booth shall be equipped with dry filters achieving a PM10 control efficiency of at least 95% by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
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]
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. The emissions from this unit shall not exceed either of the following limits: 149.0 lb-VOC/day or 19.0 lb-PM10/day [District Rule 2201] Federally Enforceable Through Title V Permit
15. Facility-wide emissions, in any rolling 12-month period, shall not exceed either of the following limits: 54,385 lb-VOC/year or 29,199 lb-PM10/year. [District Rule 2201] Federally Enforceable Through Title V Permit
16. VOC emissions from each coating and/or solvent used shall be calculated as follows: VOC emissions = VOC content (lb/gallon) as applied x usage (gallon/day or gallon/year). Total VOC emissions is the sum of VOC emissions from all coatings and/or solvents used. [District Rule 2201] Federally Enforceable Through Title V Permit
17. PM10 emissions from each coating used shall be calculated as follows: PM10 emissions = coating density (lb/gallon) x coating solids content (%) x usage (gallons/day or gallons/year) x 0.0125. Total PM10 emissions is the sum of PM10 emissions from all coatings used. [District Rule 2201] Federally Enforceable Through Title V Permit
18. On a daily basis, the permittee shall calculate and record the following: total daily VOC emissions (lb/day) and total daily PM10 emissions (lb/day). [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
19. On a monthly basis, the permittee shall calculate and record the VOC and PM10 emissions, in pounds, from this unit for the prior calendar month. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

20. On a monthly basis, the permittee shall calculate and record the facility-wide VOC and PM10 emissions, in pounds, for the rolling 12-month period. The facility-wide VOC and PM10 emissions shall be calculated by summing the VOC and PM10 emissions from the previous 12 months from every permitted unit at this facility. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
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. 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

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## **Appendix B**

Current Permits C-1080-1-4, '-2-5, '-4-2, '-7-2,  
'-9-2, '-11-0, and '-12-0



# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-1080-1-4

**EXPIRATION DATE:** 03/31/2018

**EQUIPMENT DESCRIPTION:**

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)

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit
3. 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
4. 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
5. 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
6. 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
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

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

9. 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
10. Facility-wide VOC emissions shall not exceed 149.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. 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
12. The PM10 emission rate from the coating operation shall not exceed 50.0 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. 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
14. 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
15. 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
16. 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
17. Daily VOC emissions of each coating and/or solvent shall be calculated as follows:  $\text{daily VOC emissions} = \text{VOC content (lb/gallon) as applied} \times \text{usage (gallon/day)}$ . 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
18. Daily PM10 emissions of each coating shall be calculated as follows:  $\text{daily PM10 emissions} = \text{coating density (lb/gallon)} \times \text{coating solids content (\%)} \times \text{usage (gallons/day)} \times 0.0125$ . Total daily PM10 emissions is the sum of PM10 emissions from all coatings used. [District Rule 2201] Federally Enforceable Through Title V Permit
19. 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
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

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-1080-2-5

**EXPIRATION DATE:** 03/31/2018

**EQUIPMENT DESCRIPTION:**

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)

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit
3. 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
4. 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
5. 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
6. 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
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  
These terms and conditions are part of the Facility-wide Permit to Operate.

9. 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
10. Facility-wide VOC emissions shall not exceed 149.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. 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
12. The total VOC emission rate from this unit shall not exceed 50.0 lb/day. [District Rule 2201] 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 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
15. The total PM10 emission rate from this unit shall not exceed 14.5 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. 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
19. 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
20. Daily VOC emissions of each coating and/or solvent shall be calculated as follows:  $\text{daily VOC emissions} = \text{VOC content (lb/gallon) as applied} \times \text{usage (gallon/day)}$ . 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
21. Daily PM10 emissions of each coating shall be calculated as follows:  $\text{daily PM10 emissions} = \text{coating density (lb/gallon)} \times \text{coating solids content (\%)} \times \text{usage (gallons/day)} \times 0.0125$ . Total daily PM10 emissions is the sum of PM10 emissions from all coatings used. [District Rule 2201] Federally Enforceable Through Title V Permit
22. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

23. 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

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

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1080-4-2

EXPIRATION DATE: 03/31/2018

## EQUIPMENT DESCRIPTION:

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)

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit
3. 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
4. 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
5. 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
6. 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
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

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

9. 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
10. Facility-wide VOC emissions shall not exceed 149.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. 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
12. The PM10 emission rate from the coating operation shall not exceed 50.0 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. 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
14. 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
15. 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
16. 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
17. Daily VOC emissions of each coating and/or solvent shall be calculated as follows:  $\text{daily VOC emissions} = \text{VOC content (lb/gallon) as applied} \times \text{usage (gallon/day)}$ . 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
18. Daily PM10 emissions of each coating shall be calculated as follows:  $\text{daily PM10 emissions} = \text{coating density (lb/gallon)} \times \text{coating solids content (\%)} \times \text{usage (gallons/day)} \times 0.0125$ . Total daily PM10 emissions is the sum of PM10 emissions from all coatings used. [District Rule 2201] Federally Enforceable Through Title V Permit
19. 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
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

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-1080-7-2

**EXPIRATION DATE:** 03/31/2018

**EQUIPMENT DESCRIPTION:**

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)

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit
3. 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
4. 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
5. 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
6. 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
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

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



9. 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
10. Facility-wide VOC emissions shall not exceed 149.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The VOC emission rate from this unit shall not exceed 99.0 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. 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
13. The PM10 emission rate from this unit shall not exceed 23.3 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
14. 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
15. 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
16. 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
17. 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
18. Daily VOC emissions of each coating and/or solvent shall be calculated as follows:  $\text{daily VOC emissions} = \text{VOC content (lb/gallon) as applied} \times \text{usage (gallon/day)}$ . 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
19. Daily PM10 emissions of each coating shall be calculated as follows:  $\text{daily PM10 emissions} = \text{coating density (lb/gallon)} \times \text{coating solids content (\%)} \times \text{usage (gallons/day)} \times 0.0125$ . Total daily PM10 emissions is the sum of PM10 emissions from all coatings used. [District Rule 2201] Federally Enforceable Through Title V Permit
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. 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

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

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1080-9-2

EXPIRATION DATE: 03/31/2018

**EQUIPMENT DESCRIPTION:**

MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATION (UNDERCOATING OPERATION)

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. 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
3. 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
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. 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
6. 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
7. 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
8. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

9. Facility-wide VOC emissions shall not exceed 149.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. 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
11. The PM10 emission rate from the coating operation shall not exceed 50.0 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. 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
13. 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
14. 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
15. 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
16. 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
17. Daily VOC emissions of each coating and/or solvent shall be calculated as follows:  $\text{daily VOC emissions} = \text{VOC content (lb/gallon)} \times \text{usage (gallon/day)}$ . 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
18. Daily PM10 emissions of each coating applied outside the booth shall be calculated as follows:  $\text{daily PM10 emissions} = \text{coating density (lb/gallon)} \times \text{coating solids content (\%)} \times \text{usage (gallons/day)} \times 0.25$ . 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
19. Daily PM10 emissions of each coating applied inside the booth shall be calculated as follows:  $\text{daily PM10 emissions} = \text{coating density (lb/gallon)} \times \text{coating solids content (\%)} \times \text{usage (gallons/day)} \times 0.0125$ . 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
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. 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

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

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1080-11-0

EXPIRATION DATE: 03/31/2018

## 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

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit
3. 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
4. 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
5. 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
6. 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
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

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

9. 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
10. Facility-wide VOC emissions shall not exceed 149.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. 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
12. The PM10 emission rate from this unit shall not exceed 5.4 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
13. 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
14. The booth heater shall only be fired on PUC quality natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
15. 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
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. 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
18. 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
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 and from the booth heater. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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22. Daily PM10 emissions of each coating shall be calculated as follows:  $\text{daily PM10 emissions} = \text{coating density (lb/gallon)} \times \text{coating solids content (\%)} \times \text{usage (gallons/day)} \times 0.0125$ . Total daily PM10 emissions is the sum of PM10 emissions from the booth heater and 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

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-1080-12-0

**EXPIRATION DATE:** 03/31/2018

**EQUIPMENT DESCRIPTION:**

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)

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
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] Federally Enforceable Through Title V Permit
3. 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
4. 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
5. 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
6. 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
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

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

9. 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
10. Facility-wide VOC emissions shall not exceed 149.0 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. 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
12. 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
13. The PM10 emission rate from this unit shall not exceed 3.2 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
14. 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
15. 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
16. 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
17. 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
18. Daily VOC emissions of each coating and/or solvent shall be calculated as follows:  $\text{daily VOC emissions} = \text{VOC content (lb/gallon) as applied} \times \text{usage (gallon/day)}$ . 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
19. Daily PM10 emissions of each coating shall be calculated as follows:  $\text{daily PM10 emissions} = \text{coating density (lb/gallon)} \times \text{coating solids content (\%)} \times \text{usage (gallons/day)} \times 0.0125$ . Total daily PM10 emissions is the sum of PM10 emissions from the booth heater and all coatings used. [District Rule 2201] 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. 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

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



## **APPENDIX C**

### **BACT Guideline 4.2.1**

San Joaquin Valley  
Unified Air Pollution Control District

**Best Available Control Technology (BACT) Guideline 4.2.1\***

Last Update: 03/23/2010

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

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

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

BACT is the most stringent control technique for the emissions unit and class of source. Control techniques that are not achieved in practice or contained in a State Implementation Plan must be cost effective as well as feasible. Economic analysis to demonstrate cost effectiveness is required for all determinations that are not achieved in practice or contained in an EPA approved State Implementation Plan.

**\*This is a Summary Page for this Class of Source**

## **APPENDIX D**

Top Down BACT Analysis for Units C-1080-2, '-11, and '-12

## **BACT Analysis for VOC Emissions for Unit C-1080-12:**

### **a. Step 1 - Identify All Possible Control Technologies**

The SJVAPCD BACT Clearinghouse guideline 4.2.1, identifies the following 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, incineration: 98% control; and/or carbon adsorption: 95% control - technologically feasible
2. HVLP spray guns, coatings, cleaning materials, and solvents compliance with Rule 4612: 75% transfer efficiency (minimum) - achieved in practice
3. Other application methods as stated in 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): 12,000 cfm (per manufacturer's data from project C-1171970)

VOC (lb/year): 54,385 lb-VOC/year (worst case)

#### **1a. 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.

$$\begin{aligned}\text{VOC Emission Reductions} &= \text{Annual PE}_{\text{VOC}} \times 1 \text{ tons}/2,000 \text{ lb} \times \text{Overall Control Eff.} \\ &= 54,385 \text{ lb/year} \times 1 \text{ tons}/2,000 \text{ lb} \times 0.98 \\ &= \mathbf{26.6 \text{ ton/year}}\end{aligned}$$

(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.

$$\text{Natural Gas Usage} = \text{Flow Rate} \times C_{p\text{Air}} \times \Delta T \times \text{HEF}$$

Where: Flow Rate = Air flow through the incinerator (24,460 cfm)  
 $C_{p\text{Air}}$  = specific heat of air is 0.194 Btu/scf - °F  
 $\Delta T$  = 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)

$$\begin{aligned} \text{Natural Gas Usage} &= 12,000 \text{ cfm} \times 0.194 \text{ Btu/ scf} - \text{°F} \times (600 \text{ °F} - 77 \text{ °F}) \times 0.5 \\ &\quad \times 525,600 \text{ min/year} \times \text{MMBtu}/10^6 \text{ Btu} \\ &= 319,971 \text{ MMBtu/year} \end{aligned}$$

$$\begin{aligned} \text{Natural Gas Cost} &= 319,971 \text{ MMBtu/year} \times \$7.41/\text{MMBtu}^{(1)} \\ &= \mathbf{\$2,370,985} \end{aligned}$$

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

$$\begin{aligned} \text{Cost Effectiveness} &= \text{Natural Gas Cost} (\$/\text{year}) \div \text{Emission Reduction} (\text{ton-VOC}/\text{year}) \\ &= \$2,370,985/\text{year} \div 26.6 \text{ ton-VOC}/\text{year} \\ &= \mathbf{\$89,135/\text{ton-VOC}} \end{aligned}$$

The cost to operate a catalytic incinerator with 100% capture is \$89,135/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.

<sup>1</sup> 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>

## 1b. 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.

$$\begin{aligned}\text{VOC Emission Reductions} &= \text{Annual PE}_{\text{VOC}} \times 1 \text{ tons}/2,000 \text{ lb} \times \text{Overall Control Eff.} \\ &= 54,385 \text{ lb/year} \times 1 \text{ tons}/2,000 \text{ lb} \times 0.95 \\ &= \mathbf{25.8 \text{ ton/year}}\end{aligned}$$

### (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:

$$\begin{aligned}\text{Carbon Required} &= 54,385 \text{ lb-VOC/year} \times 0.95 \times 1 \text{ lb-Carbon}/0.2 \text{ lb-VOC} \\ &= 258,329 \text{ lb-Carbon/year}\end{aligned}$$

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:

$$\begin{aligned}\text{Annual Carbon Replacement Cost} &= 258,329 \text{ lb-Carbon/year} \times \$2/\text{lb-Carbon} \\ &= \$516,658/\text{year}\end{aligned}$$

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

$$\begin{aligned}\text{Cost Effectiveness} &= \text{Annual Carbon Replacement Cost } (\$/\text{year}) \\ &\quad \div \text{Emission Reduction } (\text{ton-VOC}/\text{year}) \\ &= \$516,658/\text{year} \div 25.8 \text{ ton-VOC}/\text{year} \\ &= \mathbf{\$20,025/\text{ton-VOC}}\end{aligned}$$

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.

**2. HVLP Spray Guns and Coatings/Cleaning Materials/Solvents 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.

**3. Other Compliant Coating Methods as stated in Rule 4612**

The applicant is proposing to utilize HVLP application equipment which has a transfer efficiency that is equal to or greater than the compliant coating methods stated in Rule 4612. Therefore, a cost effectiveness analysis is not required for this control technology.

**e. Step 5 - Select BACT**

HVLP 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. For the coating operation under unit C-1080-12, the applicant has proposed to use HVLP spray guns and coatings in compliance with District Rule 4612. Therefore, BACT for VOC is satisfied.

## **BACT Analysis for PM<sub>10</sub> Emissions for Units C-1080-2, '-11, and '-12:**

### **a. Step 1 - Identify All Possible Control Technologies**

The SJVAPCD BACT Clearinghouse guideline 4.2.1, identifies the following BACT control technologies for automotive spray painting operations, with or without a < 5.0 MMBtu/hr heater for PM<sub>10</sub> emissions as follows:

- 1) Spray booth with exhaust filters, 95% control efficiency – achieved in practice
- 2) 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. Spray booth with exhaust filters: 95% control efficiency - achieved in practice
2. Other application methods as stated in Rule 4612: 65% transfer efficiency – alternate basic equipment

### **d. Step 4 - Cost Effectiveness Analysis**

For the coating operations under permit units C-1080-2, '-11, and '-12, Scelzi Enterprises has proposed to utilize spray booths with exhaust filters that are capable of a minimum PM<sub>10</sub> control efficiency of 95%. Since the applicant is proposing to utilize a control option that is the most effective control option from step 3 above, a cost effectiveness analysis is not required.

### **e. Step 5 - Select BACT**

BACT for PM<sub>10</sub> is the use of a spray booth with exhaust filters with a 95% control efficiency. For the coating operations under units C-1080-2, '-11, and '-12, the facility is proposing to meet BACT by the use of a spray booth with exhaust filters with 95% control efficiency and the use of HVLP coating equipment. Therefore, BACT for PM<sub>10</sub> is satisfied.



## **APPENDIX E**

### **Clean Emission Unit Determination for Unit C-1080-9**

A clean emissions unit is defined in District Rule 2201, Section 3.13 as an emissions unit that meets one of the following criteria:

- The unit is equipped with an emission control technology with a minimum control efficiency of at least 95%; or
- The unit is equipped with emission control technology that meets the requirements for achieved-in-practice (AIP) Best Available Control Technology (BACT) during the 5 years immediately prior to the submission of the complete application.

The existing underbody coating operation, permit unit C-1080-9-2, is not equipped with any type of external control devices; therefore, this unit cannot be a clean emissions unit from having a control efficiency of at least 95%.

The District's 2<sup>nd</sup> quarter 2019 BACT Clearinghouse was surveyed to determine if an existing BACT guideline is applicable for this class and category of operation. Existing BACT Guidelines 4.2.1, 4.2.2, and 4.2.10 apply to various motor vehicle coating and refinishing operations.

However, underbody coatings are typically used to protect areas of a vehicle that might expect heavier wear and tear (e.g. wheel wells, inside of door panels or fenders, underside of a truck or hood, or the underside of the motor vehicle). Due to its protective nature, underbody coatings are typically thicker than regular primers, base coats, and top coats that are applied to the outside of a vehicle. Due to the thickness of this type of coating, it cannot be spray applied with a typical high volume low pressure (HVLP) applicator. Therefore, it has been determined that existing BACT guidelines 4.2.1, 4.2.2 and 4.2.10 do not apply to an underbody coating application operation. Since the District does not have an existing BACT guideline for underbody coating operations, an AIP BACT analysis is required and is performed below to determine if the unit meets AIP BACT within the past five years.

Since the facility is only a major source for VOC emissions, as demonstrated above in Section VII.5 of the application review, only AIP for VOC emissions will be evaluated as a part of this analysis.

#### **Achieved in Practice BACT Analysis:**

The Environmental Protection Agency (EPA), California Air Resources Board (CARB), San Diego County Air Pollution Control District (SDCAPCD), Bay Area Air Quality Management District (BAAQMD) and South Coast Air Quality Management District (SCAQMD) BACT clearinghouses were reviewed to determine potential control technologies for underbody coating operations. However, no BACT guidelines were found in these clearinghouses that apply to underbody coating operations.

In addition, the following prohibitory rules were also consulted:

- SJVAPCD Rule 4612 - Motor Vehicle and Mobile Equipment Coating Operations (*Last Amended October 21, 2010*)
- SCAQMD Rule 1151 - Motor Vehicle and Mobile Equipment Non-Assembly Line Coating Operations (*Last Amended September 5, 2014*)
- BAAQMD Regulation 8, Rule 45 - Motor Vehicle and Mobile Equipment Coating Operations (*Last Amended December 3, 2008*)

**Prohibitory Rules Summary:**

<b>District/ AQMD</b>	<b>Rule</b>	<b>VOC Limit</b>	<b>Application Method</b>
SJVAPCD	Rule 4602	430 grams/liter (3.6 lb/gal)	None – Underbody coatings are not subject to Coating Application Method requirements of Section 5.7 (Section 5.7)
SCAQMD	Rule 1151	430 grams/liter (3.6 lb/gal)	None – Underbody coatings are not subject to the transfer efficiency requirements of Section (d)(6)(A) (Section (j)(4))
BAAQMD	Reg 8, Rule 45	430 grams/liter (3.6 lb/gal)	None – Underbody coatings are not subject to the transfer efficiency requirements of Section 8-45-303 (Section 8-45-116)

The SJVAPCD permit database was also searched for possible facilities within this class and category of operation. Other than the subject facility, Scelzi Enterprises (C-1080), there were no other permitted underbody coating operations found. The underbody coating operation permitted under permit C-1080-9-2 limits the VOC content of all underbody coatings used to 430 g/l (3.6 lb/gal).

No BACT guidelines were found that apply to underbody coating operations. The three prohibitory rules found that are applicable to this class and category of source all contain the same VOC limit for underbody coatings: 430 g/l (3.6 lb/gal). Therefore, achieved in practice BACT for the application of underbody coatings is the use of coatings containing no more than 3.6 lb-VOC/gal.

The achieved in practice VOC limit is based on the prohibitory rules listed above. The three rules have not been amended since September 5, 2014. Therefore, this VOC limit can be considered to have been achieved in practice BACT within the past five years.

The underbody coating operation permitted under C-1080-9 has a permitted VOC content limit of 3.6 lb/gal which meets the achieved in practice limit stated above. Therefore, this unit can be considered is a clean emissions unit for VOC emissions.

## **APPENDIX F**

### **RMR and AAQA Summaries**

# San Joaquin Valley Air Pollution Control District

## Revised Risk Management Review and Ambient Air Quality Analysis

To: Dustin Brown – Permit Services  
 From: Will Worthley – Technical Services  
 Date: December 11, 2018  
 Facility Name: SCELZI ENTERPRISES INC  
 Location: 2772 S CHERRY AVE, FRESNO  
 Application #(s): C-1080-1-6, -2-7, -4-4, -9-4, -11-1, -12-1  
 Project #: C-1182078

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### 1. SUMMARY

#### 1.1 RMR

Units	Prioritization Score	Acute Hazard Index	Chronic Hazard Index	Maximum Individual Cancer Risk	T-BACT Required	Special Permit Requirements
9-4	0.34	0.06	NA <sup>1</sup>	NA <sup>1</sup>	No	Yes
12-1	1.11	0.00	NA <sup>1</sup>	NA <sup>1</sup>	No	Yes
Project Totals	>1	0.07	NA <sup>1</sup>	NA <sup>1</sup>		
Facility Totals	>1	0.28	0.88	6.02E-08		

Notes:

- Chronic Hazard Index and Cancer risk were not calculated since the increase was only on a daily basis.

#### 1.2 AAQA

Pollutant	Air Quality Standard (State/Federal)				
	1 Hour	3 Hours	8 Hours	24 Hours	Annual
CO	Pass		Pass		
NO <sub>x</sub>	Pass				Pass
SO <sub>x</sub>	Pass	Pass		Pass	Pass
PM10				Pass	Pass
PM2.5				Pass	Pass

Notes:

- Results were taken from the attached AAQA Report.
- The criteria pollutants are below EPA's level of significance as found in 40 CFR Part 51.165 (b)(2) unless otherwise noted below.
- Modeled PM10 concentrations were below the District SIL for non-fugitive sources of 5 µg/m<sup>3</sup> for the 24-hour average concentration and 1 µg/m<sup>3</sup> for the annual concentration.

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:

Unit12-1

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.

Units 9-4 & 12-1

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]

## **2. Project Description**

Technical Services received a request on December 10, 2018 to perform a Risk Management Review (RMR) and Ambient Air Quality Analysis (AAQA) for the following:

- Unit -9-4: MODIFICATION OF MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATION (UNDERCOATING OPERATION) WITH AIRLESS SPRAY GUN(S) AND AN ENCLOSED SPRAY GUN CLEANER: CONVERT EXISTING DAILY FACILITY-WIDE VOC EMISSION LIMIT OF 149 LB/DAY TO AN EQUIVALENT ANNUAL FACILITY-WIDE VOC EMISSION LIMIT OF 54,385 LB/YEAR AND ESTABLISH A PERMIT SPECIFIC VOC DAILY EMISSION LIMIT OF 149 LB/DA
- Unit -12-1: MODIFICATION OF 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: INCREASE DAILY VOC EMISSION LIMIT OF 40.0 LB/DAY TO 149.0 LB/DAY, INCREASE ANNUAL VOC EMISSION LIMIT OF 10,400 LB/YEAR TO 38,740 LB/YEAR, AND CONVERT EXISTING DAILY FACILITY-WIDE VOC EMISSION LIMIT OF 149 LB/DAY TO AN EQUIVALENT ANNUAL FACILITY-WIDE VOC EMISSION LIMIT OF 54,385 LB/YEAR

## **3. RMR REPORT**

### **3.1 Analysis**

The District performed an analysis pursuant to the District's Risk Management Policy for Permitting New and Modified Sources (APR 1905, May 28, 2015) to determine the possible cancer and non-cancer health impact to the nearest resident or worksite. This policy requires that an assessment be performed on a unit by unit basis, project basis, and on a facility-wide basis. If a preliminary prioritization analysis demonstrates that:

- A unit's prioritization score is less than the District's significance threshold and;
- The project's prioritization score is less than the District's significance threshold and;
- The facility's total prioritization score is less than the District's significance threshold

Then, generally no further analysis is required.

The District's significant prioritization score threshold is defined as being equal to or greater than 1.0. If a preliminary analysis demonstrates that either the unit(s) or the project's or the facility's total prioritization score is greater than the District threshold, a screening or a refined assessment is required

If a refined assessment is greater than one in a million but less than 20 in one million for carcinogenic impacts (Cancer Risk) and less than 1.0 for the Acute and Chronic hazard indices (Non-Carcinogenic) on a unit by unit basis, project basis and on a facility-wide basis the proposed application is considered less than significant. For unit's that exceed a cancer risk of 1 in one million, Toxic Best Available Control Technology (TBACT) must be implemented.

Toxic emissions for this project were calculated using the following methods:

- 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 Autobody Shop coating spreadsheet to calculate the TACs' emissions.

These emissions were input into the San Joaquin Valley APCD's Hazard Assessment and Reporting Program (SHARP). In accordance with the District's Risk Management Policy, risks from the proposed unit's toxic emissions were prioritized using the procedure in the 2016 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 2013-2017 from Fresno (urban dispersion coefficient selected) 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:

### Source Process Rates

Unit ID	Process ID	Process Material	Process Units	Hourly Process Rate	Annual Process Rate
9	1	VOC	LB	14.9	54385 (no change)
12	1	VOC	LB	10.9	54385 (no change)

### Point Source Parameters

Unit ID	Unit Description	Release Height (m)	Temp. (°K)	Exit Velocity (m/sec)	Stack Diameter (m)	Vertical/Horizontal/Capped
12	Automotive Coating Operation	7.93	327	6.34	1.07	Vertical

### Area Source Parameters

Unit ID	Unit Description	Release Height (m)	X-Length (m)	Y -Length (m)	Area (m <sup>2</sup> )
9	Automotive Coating Operation	0	3.66	8.53	31.2

## 4. AAQA Report

The District modeled the impact of the proposed project on the National Ambient Air Quality Standard (NAAQS) and/or California Ambient Air Quality Standard (CAAQS) in accordance with District Policy APR-1925 (Policy for District Rule 2201 AAQA Modeling) and EPA's Guideline for Air Quality Modeling (Appendix W of 40 CFR Part 51). The District uses a progressive three level approach to perform AAQAs. The first level (Level 1) uses a very conservative approach. If this analysis indicates a likely exceedance of an AAQS or Significant Impact Level (SIL), the analysis proceeds to the second level (Level 2) which implements a more refined approach. For the 1-hour NO<sub>2</sub> standard, there is also a third level that can be implemented if the Level 2 analysis indicates a likely exceedance of an AAQS or SIL.

The modeling analyses predicts the maximum air quality impacts using the appropriate emissions for each standard's averaging period. Required model inputs for a refined AAQA include background ambient air quality data, land characteristics, meteorological inputs, a receptor grid, and source parameters including emissions. These inputs are described in the sections that follow.

Ambient air concentrations of criteria pollutants are recorded at monitoring stations throughout the San Joaquin Valley. Monitoring stations may not measure all necessary pollutants, so background data may need to be collected from multiple sources. The following stations were used for this evaluation:

### Monitoring Stations

Pollutant	Station Name	County	City	Measurement Year
PM10	Fresno - Garland	Fresno	Fresno	2016
PM2.5	Fresno - Garland	Fresno	Fresno	2016

Technical Services performed modeling for directly emitted criteria pollutants with the emission rates below:



**Emission Rates (lbs/hour)**

Unit ID	Process	NOx	SOx	CO	PM10	PM2.5
12	1	0.00	0.00	0.00	0.07	0.07

**Emission Rates (lbs/year)**

Unit ID	Process	NOx	SOx	CO	PM10	PM2.5
12	1	000	000	000	100	100

The AERMOD model was used to determine if emissions from the project would cause or contribute to an exceedance of any state of federal air quality standard. The parameters outlined below and meteorological data for 2013-2017 from Fresno (urban dispersion coefficient selected) were used for the analysis:

The following parameters were used for the review:

**Point Source Parameters**

Unit ID	Unit Description	Release Height (m)	Temp. (°K)	Exit Velocity (m/sec)	Stack Diameter (m)	Vertical/Horizontal/Capped
12	Automotive Coating Operation	7.93	327	6.34	1.07	Vertical

**5. Conclusion****5.1 RMR**

The cumulative acute and chronic indices for this facility, including this project, are below 1.0; and the cumulative cancer risk for this facility, including this project, is less than 20 in a million. In addition, the cancer risk for each unit in this 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.

**5.2 AAQA**

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

## **6. Attachments**

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

## **APPENDIX G**

### **Quarterly Net Emissions Change (QNEC) Calculations**

### 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 = 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.

As discussed above, this facility has SLCs of 54,385 lb-VOC/year and 29,199 lb-PM<sub>10</sub>/year. These SLCs are not changing as a result of this project. Therefore, the QNEC will be 0 lb/qtr for VOC and PM<sub>10</sub>. For the purposes of these QNEC calculations, the VOC and PM<sub>10</sub> emissions from these coating operations will be divided equally amongst the seven coating operations at this facility. A sample calculation for VOC emissions is shown below.

$$\begin{aligned} \text{PE2}_{\text{quarterly}} &= (\text{PE2}_{\text{annual}} \div 7 \text{ coating operations}) \div 4 \text{ quarters/year} \\ &= (54,385 \text{ lb/year} \div 7) \div 4 \text{ qtr/year} \\ &= 1,942 \text{ lb VOC/qtr} \end{aligned}$$

$$\begin{aligned} \text{PE1}_{\text{quarterly}} &= (\text{PE1}_{\text{annual}} \div 7 \text{ coating operations}) \div 4 \text{ quarters/year} \\ &= (54,385 \text{ lb/year} \div 7) \div 4 \text{ qtr/year} \\ &= 1,942 \text{ lb VOC/qtr} \end{aligned}$$

C-1080-1-6:

Quarterly NEC [QNEC]			
Pollutant	PE2 (lb/qtr)	PE1 (lb/qtr)	QNEC (lb/qtr)
NO <sub>x</sub>	0	0	0
SO <sub>x</sub>	0	0	0
PM <sub>10</sub>	1,071	1,071	0
CO	0	0	0
VOC	1,942	1,942	0

C-1080-2-7:

Quarterly NEC [QNEC]			
Pollutant	PE2 (lb/qtr)	PE1 (lb/qtr)	QNEC (lb/qtr)
NO <sub>x</sub>	0	0	0
SO <sub>x</sub>	0	0	0
PM <sub>10</sub>	1,071	1,071	0
CO	0	0	0
VOC	1,942	1,942	0

C-1080-4-4:

Quarterly NEC [QNEC]			
Pollutant	PE2 (lb/qtr)	PE1 (lb/qtr)	QNEC (lb/qtr)
NO <sub>x</sub>	0	0	0
SO <sub>x</sub>	0	0	0
PM <sub>10</sub>	1,071	1,071	0
CO	0	0	0
VOC	1,942	1,942	0

C-1080-7-4:

Quarterly NEC [QNEC]			
Pollutant	PE2 (lb/qtr)	PE1 (lb/qtr)	QNEC (lb/qtr)
NO <sub>x</sub>	0	0	0
SO <sub>x</sub>	0	0	0
PM <sub>10</sub>	1,071	1,071	0
CO	0	0	0
VOC	1,942	1,942	0

C-1080-9-4:

Quarterly NEC [QNEC]			
Pollutant	PE2 (lb/qtr)	PE1 (lb/qtr)	QNEC (lb/qtr)
NO <sub>x</sub>	0	0	0
SO <sub>x</sub>	0	0	0
PM <sub>10</sub>	1,071	1,071	0
CO	0	0	0
VOC	1,942	1,942	0

C-1080-11-1:

Quarterly NEC [QNEC]			
Pollutant	PE2 (lb/qtr)	PE1 (lb/qtr)	QNEC (lb/qtr)
NO <sub>x</sub>	657	657	0
SO <sub>x</sub>	18	18	0
PM <sub>10</sub>	1,071	1,071	0
CO	547	547	0
VOC	1,942	1,942	0

C-1080-12-1:

Quarterly NEC [QNEC]			
Pollutant	PE2 (lb/qtr)	PE1 (lb/qtr)	QNEC (lb/qtr)
NO <sub>x</sub>	0	0	0
SO <sub>x</sub>	0	0	0
PM <sub>10</sub>	1,071	1,071	0
CO	0	0	0
VOC	1,942	1,942	0

## **APPENDIX H**

### **Emissions Inventory Data for 2017 and 2018**





# Emission Statement - Calendar Year 2017 Emissions

Date / Time Printed 02/14/2018 / 8:52:17 AM

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 SCELZ ENTERPRISES INC  
 TOXID #  
 Planning Inventory 3170

N

**CHECK BOX IF PROCESS RATES ARE CONFIDENTIAL :**

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
<b>Totals For the Facility (Tons / Year)</b>						0.02	13.85	0.00	0.01	0.0	0.0

**Note: NH3 emissions are in lbs / yr**

**Contact** Jim Scelzi

**Company** SCELZI ENTERPRISES INC

**Address** 2286 E DATE AVE

**City, State, Zip** FRESNO, CA 93706

**Telephone** (559) 237 - 5541

**Email:**

**Location of facility if different from above** SCELZI ENTERPRISES INC  
2772 S CHERRY AVE  
FRESNO, CA 93706

**Name and Title of Responsible Official**  
 Michael Scelzi, Owner  
 Angel Topoozian, Regulatory Manager

I certify that the information contained in the Emission Statement is accurate to the best of my knowledge.

\_\_\_\_\_  
 Signature of Responsible Official and Date

# Emission Statement - Calendar Year 2018 Emissions

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

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

Date / Time Printed 2/25/2019 / 7:46:00 AM  
 UTM Zone: 11  
 UTM East: 251.485  
 UTM North: 4065.28

N

**CHECK BOX IF PROCESS RATES ARE CONFIDENTIAL :**

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	2249	GALLONS COATING	.0	1.61	.0	.0	.0	.0	(Tons/Yr)
1	2	SOLVENTS	0	GALLONS	.0	1.81	.0	.0	.0	.0	(Tons/Yr)
2	1	TOTAL COATINGS COATINGS	4332	GALLONS COATING	.0	.0	.0	.0	.0	.0	(Tons/Yr)
2	2	SOLVENTS	0	GALLONS	.0	.0	.0	.0	.0	.0	(Tons/Yr)
4	1	TOTAL COATINGS EXCEPT SOLVENTS	4484	GALLONS COATING	.0	1.5	.0	.0	.0	.0	(Tons/Yr)
4	2	SOLVENTS	0	GALLONS	.0	3.36	.0	.0	.0	.0	(Tons/Yr)
7	1	TOTAL COATINGS EXCEPT SOLVENTS	6050	GALLONS COATING	.0	1.6	.0	.0	.0	.0	(Tons/Yr)
7	2	SOLVENTS	0	GALLONS	.0	4.84	.0	.0	.0	.0	(Tons/Yr)
7	3	1.075 MMBTU/HR DRYING BURNER - NG	0.38	MILLION CUBIC FEET BURNED	100.0	5.5	2.85	84.0	7.6	.0	(Tons/Yr)
9	1	TOTAL COATINGS EXCEPT SOLVENTS	2329	GALLONS COATING	.0	2	.0	.0	.0	.0	(Tons/Yr)
9	2	SOLVENT - SIMPLE GREEN	0	GALLONS	.0	.23	.0	.0	.0	.0	(Tons/Yr)
10	1	LASER CUTTING OPERATION	7.57	TONS PRODUCT	.0	.0	.0	.0	30.0	.0	(Tons/Yr)
11	1	TOTAL COATINGS EXCEPT SOLVENTS	6033	GALLONS COATING	.0	1.6	.0	.0	.0	.0	(Tons/Yr)
11	2	SOLVENTS	0	GALLONS	.0	4.83	.0	.0	.21	.0	(Tons/Yr)
11	3	3.0 MMBTU/HR HEATER - NG	0.88	MILLION CUBIC FEET BURNED	100.0	5.5	2.85	84.0	7.6	.0	(Tons/Yr)
				10300603	.04	.0	.0	.04	.0	.0	(Tons/Yr)

# Emission Statement - Calendar Year 2018 Emissions

Date / Time Printed 2/25/2019 / 7:46:00 AM

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

N

**CHECK BOX IF PROCESS RATES ARE CONFIDENTIAL :**

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
12	1	TOTAL COATINGS EXCEPT SOLVENTS	471	GALLONS COATING	.0	1.0	.0	.0	5.5	.0	
12	2	SOLVENTS	0	40200110 GALLONS	.0	.02	.0	.0	.02	.0	
				40200998 GALLONS	.0	.0	.0	.0	.0	.0	
<b>Totals For the Facility (Tons / Year)</b>					0.06	15.31	0.00	0.05	0.23	0.0	

**Contact** Jim Scelzi  
**Company** SCELZI ENTERPRISES INC  
**Address** 2286 E DATE AVE  
**City, State, Zip** FRESNO, CA 93706  
**Telephone** (559) 237 - 5541  
**Email:**  
**Location of facility if different from above** SCELZI ENTERPRISES INC  
 2772 S CHERRY AVE  
 FRESNO, CA 93706

**Name and Title of Responsible Official**  
 Stephen Thompson, Safety & Regulatory Manager  
 Michael Scelzi, Owner

I certify that the information contained in the Emission Statement is accurate to the best of my knowledge.

\_\_\_\_\_  
 Signature of Responsible Official and Date