

Authority to Construct Application Review

Motor Vehicle and Mobile Equipment Coating
(without paint booth)

Facility Name: Facility's Name Date: Completion Date
Mailing Address: Facility's Mailing Address Engineer: Engineer's Name
Facility's City, CA Zip Code Lead Engineer: Engineer's Name
Contact Person: Contact Person's Name
Telephone: (XXX) XXX-XXXX, ext. XXXX
Application # (#'s): X-XXXX-X-X, -X-X, -X-X, and -X-X (as necessary)
Project #: X-XXXXXXX
Deemed Complete: Project Complete Date

I. Proposal

The primary business of this business is the repairing and painting of motor vehicles and mobile equipment. The above named business is applying for an Authority to Construct (ATC) for a motor vehicle and mobile equipment painting operation. This coating operation will not be equipped with a paint booth. The PM₁₀ emissions will be limited to 2.0 lbs/day to avoid triggering Best Available Control Technology (BACT) for PM₁₀.

II. Applicable Rules

Rule 2201 New and Modified Stationary Source Review Rule (12/18/08)
Rule 4612 Motor Vehicle and Mobile Equipment Refinishing Operations – Phase II (9/20/07)
CH&SC 41700 Health Risk Assessment
CH&SC 42301.6 School Notice

III. Project Location

{If the painting operation is or is not located within 1,000 ft of the outermost boundary of a K-12 school, edit the following statement as necessary:}

The project is located at 12345 N. Street Rd. in Any City, CA. The District has verified that the equipment is/is not located within 1,000 feet of a K-12 school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is/is not applicable to this project.

IV. Process Description

The paint spray operation occurs in two stages, automotive body preparation (including application of primer and sanding) and application of topcoat. The first step is auto body prep work, including the application of primer (which includes primer pretreatment, surfacer, and sealer). The second step involves application of the topcoat.

V. Equipment Listing

Approved HVLP Spray Gun(s) or Electrostatic Spray Gun(s)
hp electric air compressor

X-XXXX-XX-XX: MOTOR VEHICLE AND MOBILE EQUIPMENT COATING OPERATION
WITHOUT SPRAY BOOTH

VI. General Calculations

A. Assumptions

- To avoid triggering BACT, daily PM₁₀ emissions from coating without a paint booth will be limited to 2.0 lb/day (per Applicant).
- Assumed application is with HVLP spray gun
- HVLP gun transfer efficiency (TE) is 75% (per STAPPA/ALAPCO Vol. 2, pg. 14-7, 5/30/91).
- For emissions calculations purposes the facility is assumed to operate 24 hr/day and 365 days/yr (District assumption to conservatively estimate emissions).

B. Emission Factors

- Worst case coating VOC content is 4.5 lb/gal as applied (District Rule 4612, Table 1 Uniform Finish Coating emission factor).
- Primer VOC content is 2.1 lb/gal (District Rule 4612, Sec 5.1 limit).
- PM₁₀ EF for enamel is 5.5 lb/gal, assuming all PM emissions are PM₁₀ (STAPPA/ALAPCO Vol. 2, pg. 14-4, 5/30/91).
- PM₁₀ EF for primer is 3.0 lb/gal, assuming all PM emissions are PM₁₀ (STAPPA/ALAPCO Vol. 2, pg. 14-4, 5/30/91).

C. Calculations

1. Pre-Project Potential to Emit (PE1)

Since this is a new unit at this facility the daily and annual pre-project emissions are zero for all criteria pollutants.

$$PE1 = 0.0 \text{ lb/day} = 0 \text{ lb/yr}$$

2. Post-Project Potential to Emit (PE2)

Daily PE2 (lb/day)

The daily PM₁₀ emissions for the coating operation is determined based upon the PM₁₀ limit of 2.0 lb-PM₁₀/day so that BACT is not triggered:

$$\begin{aligned} \text{PE2}_{\text{PM}_{10}} \text{ (lb/day)} &= \text{PM}_{10} \text{ limit (lb-PM}_{10}\text{/day)} \\ &= \mathbf{2.0 \text{ lb-PM}_{10}\text{/day}} \end{aligned}$$

The daily VOC emissions are determined as follows based on the PM₁₀ limit of 2.0 lbs/day and a worst case assumption of Uniform Finish Enamel coating. First the uncontrolled PM₁₀ emissions are determined:

$$\text{Uncontrolled PE2}_{\text{PM}_{10}} \text{ (lb/day)} = \text{HVLP controlled PM}_{10} \text{ limit (lb-PM}_{10}\text{/day)} \div (1 - \text{HVLP Transfer Efficiency})$$

$$\begin{aligned} \text{Uncontrolled PE2}_{\text{PM}_{10}} &= 2.0 \text{ lb-PM}_{10}\text{/day} \div (1 - 0.75) \\ \text{Uncontrolled PE2}_{\text{PM}_{10}} &= 8.0 \text{ lb-PM}_{10}\text{/day} \end{aligned}$$

Next, the maximum daily coating usage is determined:

$$\text{Coating Usage (gal/day)} = \frac{\text{Uncontrolled PM}_{10} \text{ (lb-PM}_{10}\text{/day)}}{\text{Coating PM}_{10} \text{ Content (lb-PM}_{10}\text{/gal)}}$$

$$\begin{aligned} \text{Coating Usage} &= 8.0 \text{ lb-PM}_{10}\text{/day} \div 5.5 \text{ lb-PM}_{10}\text{/gal} \\ &= 1.45 \text{ gal/day} \end{aligned}$$

Last, the VOC emissions from the coating operation is determined:

$$\text{PE2}_{\text{VOC}} \text{ (lb/day)} = \text{Coating Usage (gal/day)} \times \text{Coating VOC Content (lb-VOC/gal)}$$

$$\begin{aligned} \text{PE2}_{\text{VOC}} &= 1.45 \text{ gal/day} \times 4.5 \text{ lb-VOC/gal} \\ &= \mathbf{6.5 \text{ lb-VOC/day}} \end{aligned}$$

Annual PE2 (lb/yr)

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

$$\text{PE2}_{\text{Annual}} \text{ (lb/yr)} = \text{PE2 (lb-Pollutant/day)} \times 365 \text{ day/yr}$$

$$\begin{aligned} \text{PE2}_{\text{Annual PM}_{10}} &= 2.0 \text{ lb-PM}_{10}\text{/day} \times 365 \text{ day/yr} \\ &= \mathbf{730 \text{ lb-PM}_{10}\text{/yr}} \end{aligned}$$

$$\text{PE2}_{\text{Annual VOC}} = 6.5 \text{ lb-VOC/day} \times 365 \text{ day/yr}$$

= 2,389 lb-VOC/yr

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

Pursuant to Section 4.9 of District Rule 2201, the Pre-Project Stationary Source Potential to Emit (SSPE1) is the Potential to Emit (PE) from all units with valid ATCs or PTOs at the Stationary Source and the quantity of Emission Reduction Credits (ERCs) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

{If this is a new facility use the following statement:}

Since this is a new facility, there are no existing permit units or any ERCs banked at this facility. Thus:

SSPE1 = 0 lb/yr

{If this is an existing facility use the following table:}

Pre-Project Stationary Source Potential to Emit [SSPE1] (lb/year)					
Permit Unit	NO _x	SO _x	PM ₁₀	CO	VOC
C-XXXX-1-0	3,540	200	360	2,210	900
C-XXXX-2-0	0	0	4,000	0	0
Pre-Project SSPE (SSPE1)	3,540	200	4,360	2,210	900

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

Pursuant to Section 4.10 of District Rule 2201, the Post-project Stationary Source Potential to Emit (SSPE2) is the Potential to Emit (PE) from all units with valid ATCs or PTOs, except for emissions units proposed to be shut down as part of the Stationary Project, at the Stationary Source and the quantity of Emission Reduction Credits (ERCs) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

{Note: The following table adds rows 1 thru X with the results presented in the SSPE1 row. After entering the data in rows 1 thru X, highlight the SSPE2 Total row and press F9.}

Post Project Stationary Source Potential to Emit [SSPE2] (lb/year)					
Permit Unit	NO _x	SO _x	PM ₁₀	CO	VOC
C-XXXX-1-0	3,540	200	360	2,210	900
C-XXXX-2-0	0	0	4,000	0	0
C-XXXX-3-0 (new)	0	0	730	0	2,389

Post Project SSPE (SSPE2)	3,540	200	5,090	2,210	3,289
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5. Quarterly Net Emissions Change (QNEC)

The QNEC is calculated solely to establish emissions that are used to complete the District's PAS database emissions profile screen. The QNEC shall be calculated as follows:

QNEC = PE2 - PE1, where:

Quarterly NEC [QNEC]			
	PE2 (lb/qtr)	PE1 (lb/qtr)	QNEC (lb/qtr)
NO _x	0	0	0
SO _x	0	0	0
PM ₁₀	183	0	183
CO	0	0	0
VOC	597	0	597

VII. Compliance

Rule 2201 - New and Modified Stationary Source Review Rule

See Policy SSP 1305 (GEAR 12) for Top-Down BACT evaluation, offsets discussion, and public notification discussion.

A. Best Available Control Technology (BACT)

1. BACT Applicability

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis for the following*:

- a) Any new emissions unit with a potential to emit exceeding 2.0 pounds per day,
- b) The relocation from one Stationary Source to another of an existing emissions unit with a potential to emit exceeding 2.0 pounds per day,
- c) Modifications to an existing emissions unit with a valid Permit to Operate resulting in an AIPE exceeding 2.0 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.

*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.

BACT Applicability			
Pollutant	PE ₂ (lb/day)	BACT Trigger Levels (lb/day)	BACT Required?
NO _x	0.0	> 2.0	No
SO _x	0.0	> 2.0	No
PM ₁₀	2.0	> 2.0	No
CO	0.0	> 2.0 and SSPE2 > 200,000 lb/yr	No
VOC	6.5	> 2.0	Yes

Thus, BACT will be triggered for VOC.

2. BACT Analysis

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 BACT guideline 4.2.1, (current quarter) (current year), and the Top-Down BACT analysis, both of which appear in GEAR 12 Policy, BACT is satisfied with:

- HVLP spray guns, and coatings compliant with District rules.

The applicant is proposing BACT by using HVLP spay guns, and coatings compliant with District rules. Therefore, the permit will include conditions to ensure compliance with BACT.

B. Daily Emissions Limits (DEL)

The following conditions will be imposed to establish DEL:

- {4444} VOC emissions from this operation shall not exceed X.X pounds in any one day. [District Rule 2201]
- {4445} Particulate matter (PM10) emissions (including painting and priming) shall not exceed 2.0 lb/day. [District Rule 2201]

C. Compliance Assurance

The permittee is required to maintain records in accordance with District Rule 2201 and District Rule 4612. See attached Draft ATC for conditions.

Rule 4612 - Motor Vehicle and Mobile Equipment Refinishing 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 3.43.1, in excess of the applicable limits in Table 1, except as provided in Section 5.3. These limits are presented in the following table:

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

The applicant has proposed that the coatings used at the facility meet the requirements of this Rule. The following conditions will be listed on the proposed ATC's to ensure compliance:

- {4236} 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 5.8 list compliant application methods. The applicant has proposed the use of HVLP application methods that meet the requirements of this Rule. The following conditions will be listed on the proposed ATC's to ensure compliance:

- {4237} Only high-volume low-pressure (HVLP) spray equipment, electrostatic, bush, dip, or roll coating application equipment, or other application equipment approved by the District in writing, shall be used. All application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4612]
- {4238} If a 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. 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 from the manufacturer of the gun. [District Rule 4612]

Sections 5.9 and 5.10 contain the requirements for solvent use. Conditions on the permit will ensure compliance with this section.

Section 6.0 contains the administrative requirements for this rule. Conditions on the permit will ensure compliance with this section.

CH&SC 41700 California Health & Safety Code (Health Risk Analysis)

Pursuant to the District's Risk Management Policy for Permitting New and Modified Sources (APR 1905, 3/2/01), a risk management review has been performed for this project to analyze the impact of toxic emissions. For projects where the increase in cancer risk is greater than one per million, Toxic Best Available Control Technology (T-BACT) is required.

{If the total facility Prioritization score including this project is ≤ 1.0 , use the following statement:}

District policy APR 1905 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 or equal to one. According to the Technical Services Memo for this project (see Appendix C), the total facility prioritization score including this project was less than or equal to one. Therefore, no further analysis is required to determine the impact from this project.

{If the total facility Prioritization score including this project > 1.0 , use the following statement:}

District policy APR 1905 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 or equal to one. According to the Technical

Services Memo for this project (see Appendix C), the total facility prioritization score including this project was greater than one. Therefore, an HRA was required to determine the short-term and long-term chronic exposure from this project.

The HRA results for this project are shown below:

HRA Results				
Unit	Acute Hazard Index	Chronic Hazard Index	Cancer Risk	T-BACT Required?
X-XXXX-X-X	0.XX	0.XX	X.X per million	?

{For a project where T-BACT is not triggered}

T-BACT is required if the acute or chronic exposure is greater than the District's significance level. BACT for toxic emissions (T-BACT) is not required for this project because the HRA (see Appendix C) indicates that the risk is not above the District's thresholds for triggering T-BACT requirements.

{For a project where T-BACT is triggered}

BACT for toxic emissions (T-BACT) is required if the cancer risk exceeds one in one million. As demonstrated above, T-BACT is required for this project because the HRA indicates that the risk is above the District's thresholds for triggering T-BACT requirements.

For this project T-BACT is triggered for PM₁₀ and VOC. T-BACT is satisfied with BACT for PM₁₀ and VOC (see Appendix X), which is the use of HVLP spay guns, coatings compliant with District Rules, enclosed paint gun cleaners, and a spray booth with exhaust filters; therefore, compliance with the District's Risk Management Policy is expected.

{For all projects, use one of the following applicable scenarios. Delete the other:}

{Scenario 1} The applicant has proposed that no paints containing *{Note: Use applicable compounds as proposed by the applicant.}* lead compounds and/or nickel compounds will be used at this facility. Because this was taken into account to determine this project's health risk, the ATC for this project will require that no paints containing *{Note: Use applicable compounds as proposed by the applicant.}* chromium compounds, lead compounds, and/or nickel compounds will be used at this facility. *{Note: Use applicable general conditions depending on the compounds proposed by the applicant.}* . Therefore, the following condition will be listed on the proposed ATC to ensure compliance:

- {4442} No coatings, solvents, or additives containing any of the following compounds shall be used: chromium, lead or nickel. [District Rule 4102]

{Scenario 2} The applicant has proposed that paints containing {Note: List applicable compounds as proposed by the applicant. As of 2003, no automotive paints containing chromium or cadmium compounds can be used in California.} lead and/or nickel compounds, will be used at this facility. Because this was taken into account to determine this project's health risk, the ATC for this project will require that the use of paints containing {Note: Use applicable compounds as proposed by the applicant.} lead and/or nickel compounds be limited and that no paints containing chromium compounds be used at this facility. Therefore, the following conditions will be listed on the proposed ATC to ensure compliance:

- {4440} The as-applied use of coatings containing (name specific toxic substance) shall not exceed XX percent by weight and use shall not exceed XX gallon(s) per day and XXX gallon(s) per year. [District Rule 4102 and CH&SC 41700]
- {4442} No coatings, solvents, or additives containing any of the following compounds shall be used: chromium, lead or nickel. [District Rule 4102]

{Leave the following section for all projects:}

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 10 in a million). As outlined by the HRA Summary in Appendix C of this report, the emissions increases for this project was determined to be less than significant.

California Environmental Quality Act (CEQA)

The California Environmental Quality Act (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 San Joaquin Valley Unified Air Pollution Control District (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.
- 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.

Consistent with California Environmental Quality Act (CEQA) and CEQA Guidelines requirements, the San Joaquin Valley Air Pollution Control District (District) has adopted procedures and guidelines for implementing CEQA. The District's Environmental Review Guidelines (ERG) establishes procedures for avoiding unnecessary delay during the District's

permitting process while ensuring that significant environmental impacts are thoroughly and consistently addressed. The ERG includes policies and procedures to be followed when processing permits for projects that are exempt under CEQA.

The State Legislature granted a number of exemptions from CEQA, including projects that require only ministerial approval. Based upon analysis of its own laws and consideration of CEQA provisions, the District has identified a limited number of District permitting activities considered to be ministerial approvals. As set forth in §4.2.1 of the ERG, projects permitted consistent with the District's *Guidelines for Expedited Application Review* (GEAR) are standard application reviews in which little or no discretion is used in issuing Authority to Construct (ATC) documents.

For the proposed project, the District performed an Engineering Evaluation (this document) and determined that the project qualifies for processing under the procedures set forth in the District's Permit Services Procedures Manual in the Guidelines for Expedited Application Review (GEAR). Thus, as discussed above, this issuance of such ATC(s) is a ministerial approval for the District and is not subject to CEQA provisions.

On December 17, 2009, the District's Governing Board adopted the first comprehensive regional policy and guidance on addressing and mitigating GHG emission impacts caused by industrial, commercial, and residential development in the San Joaquin Valley. The adopted District policy – *Addressing GHG Emission Impacts for Stationary Source Projects under CEQA When Serving as the Lead Agency* applies to projects for which the District has discretionary approval authority over the project and serves as the lead agency for CEQA purposes. The policy relies on the use of performance based standards, otherwise known as Best Performance Standards (BPS) to assess significance of project specific greenhouse gas emissions on global climate change during the environmental review process, as required by CEQA.

Use of BPS is a method of streamlining the CEQA process of determining significance and is not a required emission reduction measure. However, consistent with the District's objective to achieve the GHG emission reduction targets established pursuant to AB 32, BPS will be incorporated into the District's GEAR application review process. In the interim, projects meeting the existing GEAR requirements will continue to be processed as ministerial approvals.

CH&SC 42301.6 California Health & Safety Code (School Notice)

{Use one of the following statements as applicable:}

As this facility **is not** within 1,000 feet of a school, the provisions of this section do **not** apply.

{or}

As this facility **is** within 1,000 feet of a school, the provisions of this section **do** apply. Thus, there will be a school notice performed due to this project.

{or}

As this facility is within 1,000 feet of a school, but there is no increase in hazardous air pollutants (HAPs), the provisions of this section do not apply.

VIII. Recommendation

Issue Authority to Construct X-XXXX-X-X subject to the permit conditions on the attached Authority to Construct in Appendix B.

{For school notice projects use the following statement:}

Pending a successful School Noticing period, issue Authority to Construct X-XXXX-X-X subject to the permit conditions on the attached draft Authority to Construct in Appendix B.

IV. Billing

Billing Schedule			
Permit Number	Fee Schedule	Fee Description	Fee Amount
X-XXXX-X-X	3020-01-X	XX hp electric motors	\$XX.00

Appendices

- A: HRA Summary
- B: Draft ATC

Facility Name
Facility Number, Project Number

Appendix A HRA Summary

Facility Name
Facility Number, Project Number

Appendix B

Draft ATC and Emissions Profile

Facility Name
Facility Number, Project Number

{Note: Not to be included with final Engineering Evaluation.}
ATC Conditions

AUTO COATING WITHOUT BOOTH

1. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102] N
2. {271} All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] N
3. {4237} 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] N
4. {4238} If an HVLP spray gun is used, the operator must demonstrate that the spray gun operates between 0.1 and 10 pounds per square inch, gauge, (psig) air atomizing pressure, measured dynamically at the center of the air cap and at the air horns. For a gun permanently labeled HVLP by the manufacturer, a satisfactory demonstration shall either be in the form of manufacturer's published technical information or by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer of the gun. For a gun not permanently labeled HVLP by the manufacturer, a satisfactory demonstration shall be based on manufacturer's published technical material and by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer of the gun. [District Rule 4612] N
5. {4241} All fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners shall be stored in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4612] N
- 7a. {4442} *No coatings, solvents, or additives containing any of the following compounds shall be used: chromium, lead or nickel. [District Rule 4102] N*
- 7b. {4440} *The as-applied use of coatings containing (name specific toxic substance) shall not exceed XX percent by weight and use shall not exceed XX gallon(s) per day and XXX gallon(s) per year. [District Rule 4102 and CH&SC 41700] N*
8. {4239} For solvent cleaning operations other than for bug and tar removal, the permittee shall not use solvents that have VOC content greater than 25 g/l (0.21 lb/gal) of cleaning material. [District Rule 4612] N
9. {4240} For bug and tar removal, the permittee shall not use any material other than bug and tar remover regulated under the Consumer Products Regulation (California Code of Regulations Section 94507 et seq.). [District Rule 4612] N

10. {15} No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] N
11. {4236} The VOC Regulatory content of coatings, as applied shall not exceed any of the following limits: adhesion promoter 540 g/l (4.5 lb/gal), clear coating 250 g/l (2.1 lb/gal), color coating 420 g/l (3.5 lb/gal), multi-color coating 680 g/l (5.7 lb/gal), pretreatment coating 660 g/l (5.5 lb/gal), primer 250 g/l (2.1 lb/gal), primer sealer 250 g/l (2.1 lb/gal), single-stage coating 340 g/l (2.8 lb/gal), temporary protective coating 60 g/l (0.5 lb/gal), underbody coating 430 g/l (3.6 lb/gal), uniform finish coating 540 g/l (4.5 lb/gal), and any other coating type 250 g/l (2.1 lb/gal). The VOC Regulatory content for coatings shall be defined as the VOC in grams per liter of coating (or pounds per gallon of coating), excluding water and exempt compounds. [District Rules 2201 and 4612] N
12. {4444} VOC emissions from this operation shall not exceed X.X pounds in any one day. [District Rule 2201] N
13. {4445} Particulate matter (PM₁₀) emissions (including painting and priming) shall not exceed 2.0 lb/day. [District Rule 2201] N
14. {4443} 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] N
15. {4242} The permittee shall maintain and have available at all times the following: a current list of all coatings used that includes the material name and manufacturer, application method, coating type and mix ratio specific to the coating, and the VOC Actual for Coatings and VOC Regulatory for Coatings as applied; current manufacturer specification sheets, material safety data sheets (MSDS), technical data sheets, or air quality data sheets, which list the VOC Actual for Coatings and VOC Regulatory for Coatings of each ready-to-spray coating and automotive coating components; and purchase records identifying the coating type, name, and volume of coatings bought. [District Rule 4612] N
16. {4243} The permittee shall keep the following records for each solvent used for cleaning activities: the quantity of solvent used; a copy of the manufacturer's product data or material safety data sheet (MSDS); the solvent's name and manufacturer, the VOC content of the solvent in grams/liter or pounds/gallon, and the mix ratio and VOC content of the batch when the solvent is a mixture of different materials blended by the permittee. [District Rule 4612] N
17. {4244} Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4612] N