



September 14, 2021

Mr. Mike Davidson Sanger Boats, Inc. 3316 E Annadale Ave Fresno, CA 93725

Re: Notice of Preliminary Decision - Title V Permit Renewal

Facility Number: C-1074 Project Number: C-1203995

Dear Mr. Davidson:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Sanger Boats, Inc. at 3316 E. Annadale Ave in Fresno, California.

The notice of preliminary decision for this project has been posted on the District's website (www.valleyair.org). After addressing all comments made during the 30-day public notice and the 45-day EPA comment periods, the District intends to issue the renewed Federally Mandated Operating Permit. Please submit your written comments on this project within the 30-day public comment period, as specified in the enclosed public notice.

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

Sincerely.

Brian Clements

**Director of Permit Services** 

**Enclosures** 

CC: Courtney Graham, CARB (w/enclosure) via email Laura Yannayon, EPA (w/enclosure) via EPS CC:

> Samir Sheikh Executive Director/Air Pollution Control Officer

# SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT

Proposed Title V Permit Renewal Evaluation Sanger Boats, Inc. C-1074

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### TITLE V PERMIT RENEWAL EVALUATION

### **Fiberglass Boat Manufacturing**

Engineer: Mungi Hong

Date: September 14, 2021

Facility Number: C-1074

**Facility Name:** Sanger Boats, Inc. **Mailing Address:** 3316 E Annadale Ave Fresno, CA 93725

Contact Name: Mike Davidson Phone: (559) 485-2842

Responsible Official: Mike Davidson

Title: President

**Project #:** C-1203995

Deemed Complete: January 25, 2021

### I. PROPOSAL

Sanger Boats, Inc. was issued its last renewed Title V permit on December 22, 2016. As required by District Rule 2520, the applicant has applied to renew their Title V permit. The existing Title V permit shall be reviewed and modified to reflect all applicable District and federal rules updated, removed, or added since the issuance of the last Title V permit.

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

### II. FACILITY LOCATION

Sanger Boats, Inc. is located at 3316 E Annadale Ave in Fresno, CA.

### III. EQUIPMENT LISTING

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

### IV. GENERAL PERMIT TEMPLATE USAGE

The applicant has not proposed to use any model general permit templates for this Title V permit renewal.

### V. SCOPE OF EPA AND PUBLIC REVIEW

The applicant has not requested to use any model general permit templates. Therefore, all federally enforceable conditions in the Title V permit will be subject to EPA and public review.

### VI. FEDERALLY ENFORCEABLE REQUIREMENTS

#### A. Rules Updated or Evaluated

- District Rule 2201, New and Modified Stationary Source Review Rule (amended April 21, 2011 ⇒ amended August 18, 2019)
- District Rule 2520, <u>Federally Mandated Operating Permits</u> (amended June 21, 2001 ⇒ amended August 18, 2019)
- District Rule 4601, <u>Architectural Coatings</u> (amended December 17, 2009 ⇒ amended April 16, 2020)
- 40 CFR Part 63, Subpart VVVV, <u>National Emission Standard for Hazardous Air Pollutants for Boat Manufacturing</u> (amended November 19, 2020)
- 40 CFR Part 64, <u>Compliance Assurance Monitoring</u> (amended October 22, 1997)
- 40 CFR Part 82, Subpart B, <u>Servicing of Motor Vehicle Air Conditioners</u> (amended August 11, 2011 ⇒ amended March 24, 2021)
- 40 CFR Part 82, Subpart F, <u>Recycling and Emission Reduction</u> (amended June 18, 2008 ⇒ amended April 10, 2020)

#### **B.** Rules Removed

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

#### C. Rules Added

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

### D. Rules Not Updated

- District Rule 1070, <u>Inspection</u> (amended December 17, 1992)
- District Rule 1100, <u>Equipment Breakdown</u> (amended December 17,1992)
- District Rule 1160, Emission Statements (amended November 18, 1992)
- District Rule 2010, Permits Required (amended December 17, 1992)
- District Rule 2020, Exemptions (amended December 18, 2014)
- District Rule 2031, Transfer of Permits (amended December 17, 1992)
- District Rule 2040, Applications (amended December 17, 1992)
- District Rule 2070, <u>Standards for Granting Applications</u> (amended December 17, 1992)
- District Rule 2080, Conditional Approval (amended December 17, 1992)
- District Rule 4101, Visible Emissions (amended February 17, 2005)
- District Rule 4201, <u>Particulate Matter Concentration</u> (amended December 17, 1992)
- District Rule 4653, Adhesives and Sealants (amended September 16, 2010)
- District Rule 4684, Polyester Resin Operations (amended August 18, 2011)
- District Rule 8011, <u>General Requirements</u> (amended August 19, 2004)
- District Rule 8021, <u>Construction, Demolition Excavation, Extraction, and Other Earthmoving Activities</u> (amended August 19, 2004)
- District Rule 8031, Bulk Material (amended August 19, 2004)

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

### VII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

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

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

### A. Rules Added/Updated

There are no rules that are not federally enforceable being added or updated at this time.

### B. Rules Not Updated

District Rule 4102, Nuisance (as amended December 17, 1992)

The purpose of this rule is to protect the health and safety of the public, and this rule applies to any source operation which emits or may emit air contaminants or other materials. The following conditions are based on this rule; therefore, these conditions are not federally enforceable through Title V.

Permit Unit	Condition #
C-1074-0-5	1
C-1074-2-6	2
C-1074-3-6	1
C-1074-4-6	2
C-1074-5-4	1 and 2
C-1074-6-4	1 and 2
C-1074-7-6	2
C-1074-8-6	2
C-1074-9-6	1

### VIII. PERMIT REQUIREMENTS

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

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

District Rule 2201 has been amended since this facility's Title V permit was last renewed. However, the requirements of this rule are only triggered when a source installs new equipment and/or undergoes a modification. All applicable requirements from any NSR permit actions have already been incorporated into the current Title V permit. Therefore, the updated requirements of this rule are not applicable at this time.

### B. District Rule 2520 - Federally Mandated Operating Permits

District Rule 2520 has been amended since this facility's Title V permit was last renewed. The amendments to this rule were administrative, relating only to the notification procedures for Title V permit modifications that are required to go through a public notice. The amendments to this rule did not have any effect on current permit requirements and will therefore not be addressed further in this evaluation. However, greenhouse gas emissions will be addressed under Rule 2520 during this renewal.

#### Greenhouse Gas Discussion

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

### C. District Rule 4601 - Architectural Coatings

The purpose of this rule is to limit VOC emissions from architectural coatings. This rule specifies architectural coatings storage, cleanup, and labeling requirements.

This rule is applicable to any person who supplies, markets, sells, offers for sale, applies, or solicits the application of any architectural coating, or who manufactures, blends or repackages any architectural coating for use within the District.

District Rule 4601 was amended on April 16, 2020. However, the amended rule is not SIP-approved by EPA. The previous version of this rule (amended December 17, 2009) is SIP-approved, and still valid for this project.

The following conditions on the draft renewed permit are a mechanism to ensure compliance with the requirements of this subpart:

Permit	Condition #
C-1074-0-5	25, 26, and 27

## D. 40 CFR Part 63, Subpart VVVV - <u>National Emission Standards for</u> Hazardous Air Pollutants for Boat Manufacturing

This subpart establishes national emission standards for hazardous air pollutants (HAP) for new and existing boat manufacturing facilities with resin and gel coat operations, carpet and fabric adhesive operations, or aluminum recreational boat surface coating operations. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission standards.

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

The following conditions on the draft renewed permit is a mechanism to ensure compliance with the requirements of this subpart:

Permit	Condition #
C-1074-0-5	43 through 62

### E. 40 CFR Part 64 - Compliance Assurance Monitoring

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

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

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

- a. C-1074-1: POLYESTER RESIN AND FIBERGLASS APPLICATION OPERATION CONSISTING OF HVLP, NON-ATOMIZING FLOW COATER APPLICATOR(S), EXHAUST FANS, COMPRESSORS
- 1) This permit unit contains an emissions limit for VOC emissions only.
- 2) This permit unit does not have any add-on controls; therefore, it is not subject to CAM requirements.
- b. C-1074-2, '-7, and '-8: POLYESTER GEL COAT APPLICATION OEPRATION CONSISTING OF HVLP, SPRAY GUNS, ONE SPRAY BOOTH, FILTERS, AND ONE FAN
- 1) These permit units contain an emissions limit for VOC and PM<sub>10</sub> emissions only.
- 2) These permit units do not have any add-on controls; therefore, these are not subject to CAM requirements.
- c. C-1074-3: POLYESTER RESIN AND FIBERGLASS APPLICATION OPERATION CONSISTING OF HVLP, NON-ATOMIZING FLOW COATER APPLICATOR(S), SPRAY BOOTH, FILTERS, AND ONE FAN
- 1) This permit unit contains an emissions limit for VOC emissions only.

- 2) This permit unit does not have any add-on controls; therefore, it is not subject to CAM requirements.
- d. C-1074-4: POLYESTER GEL COAT APPLICATION OPERATION CONSISTING OF HVLP, SPRAY GUNS, ONE SPRAY/TOOLING BOOTH, FILTERS, AND ONE FAN
- 1) This permit unit contains an emissions limit for each PM<sub>10</sub> and VOC emissions only.
- 2) This permit unit does not have any add-on controls; therefore, it is not subject to CAM requirements.
- e. C-1074-5 and '-6: WOOD AND FIBERGLASS TRIM GRIDNING OPERATION CONSISTING OF ONE GRINDING BOOTH, FILTERS, AND ONE FAN
- 1) These permit units do not contain any emissions limits. Therefore, these are not subject to CAM requirements.
- f. C-1074-9: POLYESTER RESIN APPLICATION OPERATION CONSISTING OF ONE SPRAY BOOTH, FILTERS, AND ONE FAN
- 1) This permit unit contains an emissions limit for VOC emissions only.
- 2) This permit unit does not have any add-on controls; therefore, it is not subject to CAM requirements.
- g. C-1074-11: WOODWORKING OPERATION WITH ONE SAW, ONE TABLE SAW, SERVED BY A DUST COLLECTOR, AND ONE ROUTER SERVED BY A DUST COLLECTOR
- 1) This permit unit contains an emissions limit for  $PM_{10}$  emissions only.
- 2) This permit unit has an add-on control (dust collector) for PM<sub>10</sub> emissions; therefore, it is subject to CAM requirements.
- 3) The post-control potential to emit (PE) for PM<sub>10</sub> for this unit can be calculated as follows:
- Post-control PE = Emission Factor (gr/dscf) x Flowrate (dscf/min) x Operation (min/year) x 1 lb-PM/7,000 gr
  - = 0.004 gr/dscf x 1,200 dscf/min x 525,600 min/year x 1 lb-PM/7,000 gr
  - = 360 lb-PM<sub>10</sub>/year, assuming 100% of PM is PM<sub>10</sub>

According to project C-1030917, the dust collector associated with this unit has a control efficiency (CE) of 99%. Therefore,

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Pre-control PE = Post-control PE (lb-PM<sub>10</sub>/year) \div (1 – CE)
= 360 lb-PM<sub>10</sub>/year \div (1 – 0.99)
= 36,000 lb-PM<sub>10</sub>/year
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Since the pre-control PE for this unit is less than the major source threshold of 140,000 lb-PM<sub>10</sub>/year, this unit is not subject to CAM for PM<sub>10</sub> emissions.

- h. C-1074-12: ADHESIVE OPERATION WITH ONE COMPRESSOR AND HIGH VOLUME LOW PRESSURE SPRAY EQUIPMENT
- 1) This permit unit contains an emissions limit for PM<sub>10</sub> and VOC emissions only.
- 2) This permit unit does not have any add-on controls; therefore, it is not subject to CAM requirements.

### F. 40 CFR Part 82, Subpart B – Servicing of Motor Vehicle Air Conditioners

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

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

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

The following condition on the draft renewed permit is a mechanism to ensure compliance with the requirements of this subpart:

Permit	Condition #
C-1074-0-5	30

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

The purpose of this subpart is to reduce emissions of class I and class II refrigerants and their non-exempt substitutes to the lowest achievable level by maximizing the recapture and recycling of such refrigerants during the maintenance, service, repair, and disposal of appliances and restricting the sale of refrigerants consisting in whole or in part of a class I or class II ozone-depleting substance or their non-exempt substitutes in accordance with Title VI of the Clean Air Act.

This subpart applies to any person maintaining, servicing, or repairing appliances containing class I, class II or non-exempt substitute refrigerants. This subpart also applies to persons disposing of such appliances (including small appliances and motor vehicle air conditioners), refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recovery and/or recycling equipment, approved recovery and/or recycling equipment testing organizations, and persons buying, selling, or offering to sell class I, class II, or non-exempt substitute refrigerants.

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

The following condition on the draft renewed permit is a mechanism to ensure compliance with the requirements of this subpart:

Permit	Condition #
C-1074-0-5	29

### IX. PERMIT SHIELD

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

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

The applicant does not propose to use any model general permit templates.

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

The applicant has not requested any permit shields other than as discussed above.

### C. Obsolete Permit Shields From Existing Permit Requirements

There were no obsolete permit shields listed in the existing permit requirements.

### X. CALIFORNIA ENVIRONMENTAL QUALITY ACT

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

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

### XI. PERMIT CONDITIONS

See Attachment A - Draft Renewed Title V Operating Permit.

#### **ATTACHMENTS**

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

## ATTACHMENT A

Draft Renewed Title V Operating Permit

EXPIRATION DA **FACILITY:** C-1074-0-5

### **FACILITY-WIDE REQUIREMENTS**

- 1. [98] No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 2. Facility-wide volatile organic compound (VOC) emissions shall be less than 50,000 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit
- {2285} The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
- {2286} The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
- {2287} The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
- Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020. [District Rules 2010 and 2020] Federally Enforceable Through Title V Permit
- {2289} The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.12.1] Federally Enforceable Through Title V Permit
- {2290} A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
- {2291} Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
- 10. {2292} The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: SANGER BOATS, INC.

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- 11. {2293} The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 12. {2294} The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
- 13. {2295} Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
- 14. {2296} If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
- 15. {2297} It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
- 16. {2298} The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
- 17. {2299} The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
- 18. {2300} The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
- 19. {2301} The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
- 20. {2302} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
- 21. {2303} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
- 22. {2304} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
- 23. {2305} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit

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

Facility Name: SANGER BOATS, INC.

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- 24. 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 (2/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101 and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
- 25. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in the Table of Standards of District Rule 4601 (12/17/09) for use or sale within the District Rule 4601 Federally Enforceable Through Title V Permit
- 26. All VOC-containing materials for architectural coatings subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601] Federally Enforceable Through Title V Permit
- 27. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601] Federally Enforceable Through Title V Permit
- 28. {2310} With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
- 29. {2311} If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
- 30. {2312} If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR 82, Subpart B. [40 CFR 82, Subpart B] Federally Enforceable Through Title V Permit
- 31. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/04) or Rule 8011 (8/19/04). [District Rules 8011 and 8021] Federally Enforceable Through Title V Permit
- 32. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/04) or Rule 8011 (8/19/04). [District Rules 8011 and 8031] Federally Enforceable Through Title V Permit
- 33. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/04) or Rule 8011 (8/19/04). [District Rules 8011 and 8041] Federally Enforceable Through Title V Permit
- 34. Whenever open areas are disturbed or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/04) or Rule 8011 (8/19/04). [District Rules 8011 and 8051] Federally Enforceable Through Title V Permit
- 35. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/04) or Rule 8011 (8/19/04). [District Rules 8011 and 8061] Federally Enforceable Through Title V Permit
- 36. Any unpaved vehicle/equipment area that anticipates more than 75 vehicle trips per day shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 100 vehicle trips per day shall comply with the requirements of Section 5.1.2 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/04) or Rule 8011 (8/19/04). [District Rules 8011 and 8071] Federally Enforceable Through Title V Permit

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- 37. {2319} Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit
- 38. {2320} The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
- 39. {2321} The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
- 40. {2322} When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
- 41. {2323} Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), and Rule 111 (Kern, Tulare, Kings). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 42. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601, sections 5.1, 5.2, 5.3, and 5.8 (12/17/09); 8021 (8/19/04); 8031 (8/19/04); 8041 (8/19/04); 8051 (8/19/04); 8061 (8/19/04); and 8071 (9/16/04). A permit shield is granted from these requirements. [District Rule 2520] Federally Enforceable Through Title V Permit
- 43. Permittee shall demonstrate compliance with the organic Hazardous Air Pollutant (HAP) emission limit requirements of 40 CFR 63, Subpart VVVV (National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing) using the compliant materials option or the emissions averaging option. Compliance using either option shall be demonstrated on a 12-month rolling-average basis and shall be determined at the end of every month (12 times per year). The first 12 month period begins on August 23, 2004. [40 CFR 63.5701, 40 CFR 63.5710(a), and 40 CFR 63.5713(a)] Federally Enforceable Through Title V Permit
- 44. While using the compliant materials option, the organic HAP content limits, by weight, are listed as follows: Production resin applied with atomization - 28%; Production resin applied with nonatomization - 35%; pigmented gel coat applied with any method - 33%; clear gel coat applied with any method - 48%; tooling resin applied with atomization - 30%; tooling resin applied with nonatomization - 39%; or tooling gel coat applied with any method -40%. [40 CFR 63.5713(a)] Federally Enforceable Through Title V Permit
- 45. While using the compliant materials option, compliance shall be demonstrated if each of the resins and gel coats used by a facility have organic HAP contents no greater than the applicable organic HAP content limits specified above. If any of the resins or gel coats used by a facility have organic HAP contents greater than the applicable organic HAP content limits specified above, the permittee shall demonstrate compliance for that specific gel coat or resin category by using Equation 1 of 40 CFR 63.5713(c): Weighted-Average HAP Content (%) = [summation of (Mi x HAPi)] [summation of Mi], where Mi = mass of open molding resin or gel used in the past 12 months, in megagrams; and HAPi = the organic HAP content, by weight percent, of each open molding resin or gel coat used in the past 12 months. If the weighted-average HAP content exceeds the applicable organic HAP content limits specified above, compliance has not been demonstrated using the compliant materials option. [40 CFR 63.5713] Federally Enforceable Through Title V Permit

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- 46. While using the emissions averaging option, the permittee shall use Equation 1 of 40 CFR 63.5710(b) to demonstrate that the organic HAP emissions from this facility do not exceed the organic HAP emission limit determined by Equation 1 of 40 CFR 63.5698(b), for the same 12-month period. If the result of Equation 1 of 40 CFR 63.5710(b) is greater than the result of Equation 1 of 40 CFR 63.5698(b), compliance has not been demonstrated using the emissions averaging option. [40 CFR 63.5710(b)] Federally Enforceable Through Title V Permit
- 47. While using the emissions averaging option, the organic HAP emissions from this facility shall not exceed the limit established by Equation 1 of 40 CFR 63.5698(b): HAP Limit = [(46 x Mr) + (159 x Mpg) + (291 x Mcg) + (54 x Mtr)]+ (214 x Mtg)], where Mr = mass of production resins used in the past 12 months; Mpg = mass of pigmented gel coats used in the past 12 months; Mcg = mass of clear gel coats used in the past 12 months; Mtr = mass of tooling resins used in the past 12 months: and Mtg = mass of tooling gel coats used in the past 12 months. All units are in megagrams. [40 CFR 63.5698(b)] Federally Enforceable Through Title V Permit
- 48. While using the emissions averaging option, the permittee shall calculate actual HAP emissions from the preceding 12 months using Equation 1 of 40 CFR 63.5710(b): Actual HAP Emissions = (PVr x Mr) + (PVpg x Mpg) + (PVcg x Mcg) + (PVtr x Mtr) + (PVtg x Mtg), where PVr = weighted-average MACT model point value for production resin used in the past 12 months; Mr = mass of production resin used in the past 12 months; PVpg = weighted-average MACT model point value for pigmented gel coat used in the past 12 months; Mpg = mass of pigmented gel coats used in the past 12 months; PVcg = weighted-average MACT model point value for clear gel coat used in the past 12 months; Mcg = mass of clear gel coats used in the past 12 months; PVtr = weighted-average MACT model point value for tooling resin used in the past 12 months; Mtr = mass of tooling resins used in the past 12 months: PVtg = weightedaverage MACT model point value for tooling gel coat used in the past 12 months; and Mtg = mass of tooling gel coats used in the past 12 months. All mass units are in megagrams and all weighted-average MACT model point values are in kilograms per megagram. [40 CFR 63.5710(b)] Federally Enforceable Through Title V Permit
- 49. While using the emissions averaging option, the weighted-average MACT point values for each resin or gel coat used by this facility shall be determined using Equation 2 of 40 CFR 63.5710(c): Weighted-Average MACT Point Value (PVr, PVpg, PVcg, PVtr and PVtg) = [summation of (Mi x PVi)] / [summation of Mi], where Mi = mass of each resin or gel coat used within the past 12 months, in megagrams; and PVi = MACT model point value for each resin or gel coat used within the past 12 months, in kilograms of HAP per megagram of material applied. [40 CFR 63.5710(c)] Federally Enforceable Through Title V Permit
- 50. While using the emissions averaging option, the MACT model point values for all resins and gel coats applied shall be determined using the formulas listed in Table 3 of 40 CFR 63, Subpart VVVV: atomized resin - [0.014 x (Resin HAP%, by weight)^2.425]; atomized resin, plus vacuum bagging with roll out - [0.01185 x (Resin HAP%, by weight)<sup>2</sup>.425]; atomized resin, plus vacuum bagging without roll out - [0.00945 x (Resin HAP%, by weight)<sup>2</sup>.425]; nonatomized resin - [0.014 x (Resin HAP%, by weight)^2.275]; nonatomized resin, plus bagging with roll out -[0.0110 x (Resin HAP%, by weight)^2.275; nonatomized resin, plus bagging without roll out - [0.0076 x (Resin HAP%, by weight)^2.275. [40 CFR 63.5710(d)] Federally Enforceable Through Title V Permit
- 51. All gel coat and resin mixing containers with a capacity equal to or greater than 55 gallons, including those used for on-site mixing of putties and polyputties shall have a cover. The covers shall have no visible gaps and shall be in place at all times, except when material is being manually added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container. [40 CFR 63.5731(a)(b)] Federally Enforceable Through Title V Permit
- 52. For routine flushing or resin and gel coat application equipment (e.g. spray guns, flowcoaters, brushes, rollers, and squeegees), permittee shall use cleaning solvents that contain no more than 5% organic HAP, by weight. For removal of cured resin and gel coat from application equipment, no organic HAP content limit applies. [40 CFR 63.5734(a)] Federally Enforceable Through Title V Permit
- 53. Organic HAP-containing solvents used for removing cured resin or gel coat shall be stored in containers with covers. The covers must have no visible gaps and shall be in place at all times, except when equipment to be cleaned is placed in or removed from the container. On containers with a capacity greater than 2 gallons, the distance from the top of the container to the solvent surface must be equal to or greater than 0.75 times the diameter of the container. [40 CFR 63.5734(b)] Federally Enforceable Through Title V Permit

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- 54. At least once per month, 55 gallon or greater mixing containers and all containers holding organic HAP containing solvents used for removing cured resin or gel coat must be inspected to ensure the covers have no visible gaps. Records of the inspections and any repairs made to the covers must be kept. [40 CFR 63.5731(c)(d) and 40 CFR 63.5737(c)] Federally Enforceable Through Title V Permit
- 55. Permittee shall use adhesives that contain no more than 5% by weight of organic HAP content for all carpet and fabric operations. [40 CFR 63.5740(a)] Federally Enforceable Through Title V Permit
- 56. Permittee shall maintain a record of the organic HAP content of cleaning solvents used for routine cleaning of resin and gel coat application equipment and adhesives used for all carpet and fabric operations. [40 CFR 63.5737(a) and 40 CFR 63.5740(b)] Federally Enforceable Through Title V Permit
- 57. Permittee shall determine HAP content of affected materials using one or more of the methods outlined in 40 CFR 63.5758. [40 CFR 63.5758] Federally Enforceable Through Title V Permit
- 58. Permittee shall submit a notification of compliance status to the District no later than 30 days after the end of the first 12-month averaging period. The notification shall include the following: type and quantity of HAP's emitted at the facility; the method used to determine compliance; the method that will be used to determine continuing compliance; and a statement by the permittee as to whether the facility has complied with the HAP content limits. If there is a change to information submitted in the notification, changes shall be submitted in writing within 15 days after the change. [40 CFR 63.5761] Federally Enforceable Through Title V Permit
- 59. Permittee shall submit a compliance report to the District every 6 months. The first compliance report shall be submitted no later than 60 days after 12/31/05. Each subsequent report shall cover the applicable semiannual reporting period from January 1 through June 30 or from July 1 through December 31. Each subsequent compliance report shall be submitted no later than 60 days after the end of the semiannual reporting period. [40 CFR 63.5764(b)] Federally Enforceable Through Title V Permit
- 60. The compliance report shall include the following information: (1) Company name and address; (2) Signed and dated statement by a responsible official certifying the truth, accuracy, and completeness of the report; (3) Dates covered by the compliance report; (4) Description of any changes in the manufacturing process since the last compliance report; (5) Table or statement showing, for each regulated operation, the applicable organic HAP content limit and application equipment requirement with which the facility is complying and the actual weighted-average organic HAP content for each operation during each of the rolling 12-month averaging periods that end during the reporting period; (6) If compliance is achieved during the reporting period, a statement indicating such effect shall be included with the report; and (7) If any of the regulated operations were not in compliance during the reporting period, the following shall be included with the semiannual compliance report: (i) Operation(s) involved in the deviation; (ii) quantity, organic HAP content, and application method of the materials involved in the deviation; (iii) actions taken to minimize the deviation and to prevent it in the future; and (iv) Statement of whether or not the facility was in compliance for the 12-month averaging period that ended at the end of the reporting period. [40 CFR 63.5764(c)] Federally Enforceable Through Title V Permit
- 61. The following exemptions apply to the gel coat and resin operations: (1) Gel coat materials used for part/mold repair and touch up shall be exempt from the organic HAP content limits. The total gel coat materials used in this exemption shall not exceed 1 percent by weight of all gel coat used at the facility on a 12-month rolling-average basis. Records shall be kept of the amount of gel coats used per month for which this exemption is being used and copies of calculations showing that the exempt amount does not exceed 1 percent of all gel coat used. (2) Pure 100% vinylester resin used for skin coats. The total resin materials included in the exemption shall not exceed 5% by weight of all resin used at the facility on a 12-month rolling-average basis. Records shall be kept of the amount of 100 percent vinylester skin coat used per month for which this exemption is being used and copies of calculations showing that the exempt amount does not exceed 5% percent of all resin used. [40 CFR 63.5698(d)] Federally Enforceable Through Title V Permit

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- 62. Permittee shall maintain the following records, in addition to those records required by conditions of this permit: (1) a copy of each notification and report submitted to the District; (2) Support documentation for any notice or report submitted to the District; (3) Total amounts of each production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat used per month and the weighted-average organic HAP content for each category of material, expressed as weight percent (this record is not required if all materials used comply with the organic HAP content requirements); (4) for production resin and tooling resin the amounts of each applied by atomized or nonatomized methods. [40 CFR 63.5767] Federally Enforceable Through Title V Permit
- 63. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin on January 1 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

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**PERMIT UNIT:** C-1074-1-7

EXPIRATION DAT

#### **EQUIPMENT DESCRIPTION:**

POLYESTER RESIN AND FIBERGLASS APPLICATION OPERATION TO HULL MOLDS FOR THE MANUFACTURE OF BOATS CONSISTING OF HVLP, NON-ATOMIZING FLOW COATER APPLICATOR(S), FIVE 1.5 HP EXHAUST FANS, ONE 7.5 HP EXHAUST FAN AND TWO 15 HP COMPRESSORS

### PERMIT UNIT REQUIREMENTS

- All exhaust fans shall be on prior to the start of and during polyester resin and fiberglass application. [District Rule 2201] Federally Enforceable Through Title V Permit
- VOC emissions from this polyester resin application operation shall not exceed 77.0 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 3. VOC emissions from resins used shall be calculated as follows: Resin Usage (gal/day) x Density of Resin (lb/gal) x 1 ton/2000 lb x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table (lb/ton). [District Rule 2201] Federally Enforceable Through Title V Permit
- The monomer (VOC) content of polyester resins used shall be less than or equal to 35%, by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- Permittee shall calculate the fiberglass boat manufacturing facility emissions to demonstrate if the VOC emissions from all fiberglass boat manufacturing operations, including related solvent cleaning activities, at the facility are equal to or greater than 2.7 tons per 12-month rolling period, before consideration of controls. [District Rule 4684] Federally Enforceable Through Title V Permit
- Permittee shall not use materials in any open molding process that exceed the following weighted average monomer VOC content limits, in weight percent: production resin atomized (spray) - 28%; production resin non-atomized - 35%; pigmented gel coat - 33%; clear gel coat - 48%; tooling resin atomized - 30%; tooling resin non-atomized - 39%; or tooling gel coat - 40%. [District Rule 4684] Federally Enforceable Through Title V Permit
- The non-monomer VOC content of each resin and gel coat shall not constitute more than 5 percent by weight of the resin or gel coat. [District Rule 4684] Federally Enforceable Through Title V Permit
- The weighted average monomer VOC content for each open molding resin or gel coat material used at this facility shall be determined based on a 12-month rolling average using Equation 1 of District Rule 4684: Weighted Average Monomer VOC Content = [Summation of (Mi x VOCi)] / [Summation of Mi]; where Mi = Mass of open molding resin or gel coat 'i' used in the past 12 months in an operation, in megagrams; and VOCi = Monomer VOC content, by weight percent, of open molding resin or gel coat 'i' used in the past 12 months in an operation. [District Rule 4684] Federally Enforceable Through Title V Permit
- Permittee shall ensure that all containers greater than 208 liters (55 gallons), including those used for on-site mixing of putties and polyputties, have a cover with no visible gaps in place at all times, except when material is being manually added or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container. [District Rule 4684] Federally Enforceable Through Title V Permit
- 10. Application of any polyester resin material shall only be performed by one of the following methods: 1) non-atomized spray technique; 2) flowcoaters; 3) pressure-fed rollers; 4) resun impregnators; 5) hand layup; or 6) any equivalent method as approved by the APCO. [District Rule 2201] Federally Enforceable Through Title V Permit

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- 11. The VOC content of organic solvents used in cleaning operations shall not exceed 25 g/l (0.21 lb/gal). [District Rule 4684] Federally Enforceable Through Title V Permit
- 12. Permittee shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in self-closing, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the containers are empty. [District Rule 4684] Federally Enforceable Through Title V Permit
- 13. Permittee shall keep records of the daily and cumulative annual (calendar year) VOC emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
- 14. Permittee shall maintain records, on a monthly basis, of the facility's 12-month rolling period VOC emissions from all fiberglass boat manufacturing operations, including related solvent cleaning activities, before consideration of controls. [District Rule 2520] Federally Enforceable Through Title V Permit
- 15. Permittee shall maintain records, on a monthly basis, of the weighted average monomer VOC content for each open molding resin or gel coat material used at this facility, determined based on a 12-month rolling average, using Equation 1 of District Rule 4684. [District Rule 2520] Federally Enforceable Through Title V Permit
- 16. Permittee shall maintain the following records: 1) Daily records of the type and quantity of all resins, gel coats, fillers, catalysts, and cleaning materials (including cleaning solvents) used in each operation; 2) Records of the VOC content, in weight percent, of all polyester resin and gel coat, filler materials, including the weight percent of non-monomer VOC content of the resin and gel coat, used or stored at the facility; and 3) Records of the VOC content of all cleaning materials used and stored at the facility as specified in Section 5.3 of District Rule 4684. [District Rules 2520 and 4684] Federally Enforceable Through Title V Permit
- 17. Permittee shall retain all records on site for a period of five years, shall make the records available on site during normal business hours to the District, ARB, or EPA, and shall submit the records to the District, ARB, or EPA upon request. [District Rules 2520 and 4684] Federally Enforceable Through Title V Permit

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Facility Name: SANGER BOATS, INC.

Location: 3316 E ANNADALE AVE, FRESNO, CA 93725

**PERMIT UNIT:** C-1074-2-6

EXPIRATION DAT

#### **EQUIPMENT DESCRIPTION:**

POLYESTER GEL COAT APPLICATION OPERATION TO MOLDS CONSISTING OF HVLP AND AIR ASSISTED AIRLESS SPRAY GUNS, A 14'W X 26'L X 9'H DEVILBISS SPRAY BOOTH (BOOTH #1), 14 (20" X 20") FILTERS, AND A 2 HP EXHAUST FAN

### PERMIT UNIT REQUIREMENTS

- Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
- All filters shall be properly maintained and must be in place during the gel coat operation. [District Rule 4102] 2.
- 3. VOC emissions from this gel coat application operation shall not exceed 20.2 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
- VOC emissions from gelcoats shall be calculated as follows: Gelcoat Usage (gal/day) x Density of gelcoat (lb/gal) x 1 ton/2000 lb x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table for styrene + Gelcoat usage (gal/day) x Density of gelcoat (lb/gal) x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table for MMA. [District Rule 2201] Federally Enforceable Through Title V Permit
- PM10 emissions from this gel coat application operation shall not exceed 15.8 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
- PM10 emissions from gelcoats used shall be calculated as follows: Gelcoat Usage (gal/day) x Density of Gelcoat (lb/gal) x Solids Content (%, by weight) x 0.187. [District Rule 2201] Federally Enforceable Through Title V Permit
- Permittee shall calculate the fiberglass boat manufacturing facility emissions to demonstrate if the VOC emissions from all fiberglass boat manufacturing operations, including related solvent cleaning activities, at the facility are equal to or greater than 2.7 tons per 12-month rolling period, before consideration of controls. [District Rule 4684] Federally Enforceable Through Title V Permit
- Permittee shall not use materials in any open molding process that exceed the following weighted average monomer VOC content limits, in weight percent: production resin atomized (spray) - 28%; production resin non-atomized - 35%; pigmented gel coat - 33%; clear gel coat - 48%; tooling resin atomized - 30%; tooling resin non-atomized - 39%; or tooling gel coat - 40%. [District Rule 4684] Federally Enforceable Through Title V Permit
- The non-monomer VOC content of each resin and gel coat shall not constitute more than 5 percent by weight of the resin or gel coat. [District Rule 4684] Federally Enforceable Through Title V Permit
- 10. The weighted average monomer VOC content for each open molding resin or gel coat material used at this facility shall be determined based on a 12-month rolling average using Equation 1 of District Rule 4684: Weighted Average Monomer VOC Content = [Summation of (Mi x VOCi)] / [Summation of Mi]; where Mi = Mass of open molding resin or gel coat 'i' used in the past 12 months in an operation, in megagrams; and VOCi = Monomer VOC content, by weight percent, of open molding resin or gel coat 'i' used in the past 12 months in an operation. [District Rule 4684] Federally Enforceable Through Title V Permit

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- 11. Permittee shall ensure that all containers greater than 208 liters (55 gallons), including those used for on-site mixing of putties and polyputties, have a cover with no visible gaps in place at all times, except when material is being manually added or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container. [District Rule 4684] Federally Enforceable Through Title V Permit
- 12. The VOC content of organic solvents used in cleaning operations shall not exceed 25 g/l (0.21 lb/gal). [District Rule 4684] Federally Enforceable Through Title V Permit
- 13. Permittee shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in self-closing, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the containers are empty. [District Rule 4684] Federally Enforceable Through Title V Permit
- 14. Permittee shall keep records of the daily and cumulative annual (calendar year) VOC emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
- 15. Permittee shall maintain records, on a monthly basis, of the facility's 12-month rolling period VOC emissions from all fiberglass boat manufacturing operations, including related solvent cleaning activities, before consideration of controls. [District Rule 2520] Federally Enforceable Through Title V Permit
- 16. Permittee shall maintain records, on a monthly basis, of the weighted average monomer VOC content for each open molding resin or gel coat material used at this facility, determined based on a 12-month rolling average, using Equation 1 of District Rule 4684. [District Rule 2520] Federally Enforceable Through Title V Permit
- 17. Permittee shall maintain the following records: 1) Daily records of the type and quantity of all resins, gel coats, fillers, catalysts, and cleaning materials (including cleaning solvents) used in each operation; 2) Records of the VOC content, in weight percent, of all polyester resin and gel coat, filler materials, including the weight percent of non-monomer VOC content of the resin and gel coat, used or stored at the facility; and 3) Records of the VOC content of all cleaning materials used and stored at the facility as specified in Section 5.3 of District Rule 4684. [District Rules 2520 and 4684] Federally Enforceable Through Title V Permit
- 18. Permittee shall retain all records on site for a period of five years, shall make the records available on site during normal business hours to the District, ARB, or EPA, and shall submit the records to the District, ARB, or EPA upon request. [District Rules 2520 and 4684] Federally Enforceable Through Title V Permit

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Location: 3316 E ANNADALE AVE, FRESNO, CA 93725

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**PERMIT UNIT:** C-1074-3-6

EXPIRATION DATE: 04/30/2021

### **EQUIPMENT DESCRIPTION:**

POLYESTER RESIN AND FIBERGLASS APPLICATION OPERATION TO MOLDS CONSISTING OF HOLP, NON-ATOMIZING FLOW COATER APPLICATOR(S), A 12'W X 10'L X 8'H SPRAY BOOTH (BOOTH #2), 28 (20" X 20") FILTERS AND A 2 HP EXHAUST FAN

### PERMIT UNIT REQUIREMENTS

- 1. All filters shall be properly maintained and must be in place during the resin operation. [District Rule 4102]
- 2. VOC emissions from this polyester resin and fiberglass application operation shall not exceed 25.8 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 3. VOC emissions from resins used shall be calculated as follows: Resin Usage (gal/day) x Density of Resin (lb/gal) x 1 ton/2000 lb x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table (lb/ton). [District Rule 2201] Federally Enforceable Through Title V Permit
- 4. Permittee shall calculate the fiberglass boat manufacturing facility emissions to demonstrate if the VOC emissions from all fiberglass boat manufacturing operations, including related solvent cleaning activities, at the facility are equal to or greater than 2.7 tons per 12-month rolling period, before consideration of controls. [District Rule 4684] Federally Enforceable Through Title V Permit
- 5. Permittee shall not use materials in any open molding process that exceed the following weighted average monomer VOC content limits, in weight percent: production resin atomized (spray) 28%; production resin non-atomized 35%; pigmented gel coat 33%; clear gel coat 48%; tooling resin atomized 30%; tooling resin non-atomized 39%; or tooling gel coat 40%. [District Rule 4684] Federally Enforceable Through Title V Permit
- 6. The non-monomer VOC content of each resin and gel coat shall not constitute more than 5 percent by weight of the resin or gel coat. [District Rule 4684] Federally Enforceable Through Title V Permit
- 7. The weighted average monomer VOC content for each open molding resin or gel coat material used at this facility shall be determined based on a 12-month rolling average using Equation 1 of District Rule 4684: Weighted Average Monomer VOC Content = [Summation of (Mi x VOCi)] / [Summation of Mi]; where Mi = Mass of open molding resin or gel coat 'i' used in the past 12 months in an operation, in megagrams; and VOCi = Monomer VOC content, by weight percent, of open molding resin or gel coat 'i' used in the past 12 months in an operation. [District Rule 4684] Federally Enforceable Through Title V Permit
- 8. Permittee shall ensure that all containers greater than 208 liters (55 gallons), including those used for on-site mixing of putties and polyputties, have a cover with no visible gaps in place at all times, except when material is being manually added or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container. [District Rule 4684] Federally Enforceable Through Title V Permit
- 9. The VOC content of organic solvents used in cleaning operations shall not exceed 25 g/l (0.21 lb/gal). [District Rule 4684] Federally Enforceable Through Title V Permit
- 10. Permittee shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in self-closing, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the containers are empty. [District Rule 4084] Federally Enforceable Through Title V Permit

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

Facility Name: SANGER BOATS, INC.

Location: 3316 E ANNADALE AVE,FRESNO, CA 93725 C-1074-3-6 : Aug 19 2021 11:54AM – HONGM

- 11. Permittee shall keep records of the daily and cumulative annual (calendar year) VOC emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. Permittee shall maintain records, on a monthly basis, of the facility's 12-month rolling period VOC emissions from all fiberglass boat manufacturing operations, including related solvent cleaning activities, before consideration of controls. [District Rule 2520] Federally Enforceable Through Title V Permit
- 13. Permittee shall maintain records, on a monthly basis, of the weighted average monomer VOC content for each open molding resin or gel coat material used at this facility, determined based on a 12-month rolling average, using Equation 1 of District Rule 4684. [District Rule 2520] Federally Enforceable Through Title V Permit
- 14. Permittee shall maintain the following records: 1) Daily records of the type and quantity of all resins, gel coats, fillers, catalysts, and cleaning materials (including cleaning solvents) used in each operation; 2) Records of the VOC content, in weight percent, of all polyester resin and gel coat, filler materials, including the weight percent of non-monomer VOC content of the resin and gel coat, used or stored at the facility; and 3) Records of the VOC content of all cleaning materials used and stored at the facility as specified in Section 5.3 of District Rule 4684. [District Rules 2520 and 4684] Federally Enforceable Through Title V Permit
- 15. Permittee shall retain all records on site for a period of five years, shall make the records available on site during normal business hours to the District, ARB, or EPA, and shall submit the records to the District, ARB, or EPA upon request. [District Rules 2520 and 4684] Federally Enforceable Through Title V Permit

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

Facility Name: SANGER BOATS, INC.

Location: 3316 E ANNADALE AVE, FRESNO, CA 93725

C-1074-3-6 : Aug 19 2021 11:54AM -- HONGM

**PERMIT UNIT:** C-1074-4-6

#### **EQUIPMENT DESCRIPTION:**

POLYESTER GEL COAT APPLICATION OPERATION TO MOLDS CONSISTING OF HVLP AND AIR ASSISTED AIRLESS SPRAY GUNS, A 13'W X 15'L X 10'H SPRAY KING 200 SPRAY/TOOLING BOOTH (BOOTH #5), 18 (20" X 20") FILTERS AND A 2 HP EXHAUST FAN

### PERMIT UNIT REQUIREMENTS

- Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
- All filters shall be properly maintained and must be in place during the resin and gel coat operations. [District Rule 4102]
- VOC emissions from this resin and gel coat application operation shall not exceed 14.2 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
- VOC emissions from resins used shall be calculated as follows: Resin Usage (gal/day) x Density of Resin (lb/gal) x 1 ton/2000 lb x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table (lb/ton). [District Rule 2201] Federally Enforceable Through Title V Permit
- VOC emissions from gelcoats used shall be calculated as follows: Gelcoat Usage (gal/day) x Density of Gelcoat (lb/gal) x 1 ton/2000 lb x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table for styrene + Gelcoat Usage (gal/day) x Density of Gelcoat (lb/gal) x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table for MMA. [District Rule 2201] Federally Enforceable Through Title V Permit
- PM10 emissions from this resin and gel coat application operation shall not exceed 7.6 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
- PM10 emissions from gelcoats used shall be calculated as follows: Gelcoat Usage (gal/day) x Density of Gelcoat (lb/gal) x Solids Content (%, by weight) x 0.187. [District Rule 2201] Federally Enforceable Through Title V Permit
- Permittee shall calculate the fiberglass boat manufacturing facility emissions to demonstrate if the VOC emissions from all fiberglass boat manufacturing operations, including related solvent cleaning activities, at the facility are equal to or greater than 2.7 tons per 12-month rolling period, before consideration of controls. [District Rule 4684] Federally Enforceable Through Title V Permit
- Permittee shall not use materials in any open molding process that exceed the following weighted average monomer VOC content limits, in weight percent: production resin atomized (spray) - 28%; production resin non-atomized - 35%; pigmented gel coat - 33%; clear gel coat - 48%; tooling resin atomized - 30%; tooling resin non-atomized - 39%; or tooling gel coat - 40%. [District Rule 4684] Federally Enforceable Through Title V Permit
- 10. The non-monomer VOC content of each resin and gel coat shall not constitute more than 5 percent by weight of the resin or gel coat. [District Rule 4684] Federally Enforceable Through Title V Permit

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

Facility Name: SANGER BOATS, INC. Location: 3316 E ANNADALE AVE,FRESNO, CA 93725 C-1074-4-6 : Aug 19 2021 11:54AM - HONGM

- 11. The weighted average monomer VOC content for each open molding resin or gel coat material used at this facility shall be determined based on a 12-month rolling average using Equation 1 of District Rule 4684: Weighted Average Monomer VOC Content = [Summation of (Mi x VOCi)] / [Summation of Mi]; where Mi = Mass of open molding resin or gel coat 'i' used in the past 12 months in an operation, in megagrams; and VOCi = Monomer VOC content, by weight percent, of open molding resin or gel coat 'i' used in the past 12 months in an operation. [District Rule 4684] Federally Enforceable Through Title V Permit
- 12. Permittee shall ensure that all containers greater than 208 liters (55 gallons), including those used for on-site mixing of putties and polyputties, have a cover with no visible gaps in place at all times, except when material is being manually added or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container. [District Rule 4684] Federally Enforceable Through Title V Permit
- 13. The VOC content of organic solvents used in cleaning operations shall not exceed 25 g/l (0.21 lb/gal). [District Rule 4684] Federally Enforceable Through Title V Permit
- 14. Permittee shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in self-closing, non-absorbent and nonleaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the containers are empty. [District Rule 4684] Federally Enforceable Through Title V Permit
- 15. Permittee shall keep records of the daily and cumulative annual (calendar year) VOC emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
- 16. Permittee shall maintain records, on a monthly basis, of the facility's 12-month rolling period VOC emissions from all fiberglass boat manufacturing operations, including related solvent cleaning activities, before consideration of controls. [District Rule 2520] Federally Enforceable Through Title V Permit
- 17. Permittee shall maintain records, on a monthly basis, of the weighted average monomer VOC content for each open molding resin or gel coat material used at this facility, determined based on a 12-month rolling average, using Equation 1 of District Rule 4684. [District Rule 2520] Federally Enforceable Through Title V Permit
- 18. Permittee shall maintain the following records: 1) Daily records of the type and quantity of all resins, gel coats, fillers, catalysts, and cleaning materials (including cleaning solvents) used in each operation; 2) Records of the VOC content, in weight percent, of all polyester resin and gel coat, filler materials, including the weight percent of non-monomer VOC content of the resin and gel coat, used or stored at the facility; and 3) Records of the VOC content of all cleaning materials used and stored at the facility as specified in Section 5.3 of District Rule 4684. [District Rules 2520 and 4684] Federally Enforceable Through Title V Permit
- 19. Permittee shall retain all records on site for a period of five years, shall make the records available on site during normal business hours to the District, ARB, or EPA, and shall submit the records to the District, ARB, or EPA upon request. [District Rules 2520 and 4684] Federally Enforceable Through Title V Permit

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

Facility Name: SANGER BOATS, INC.

Location: 3316 E ANNADALE AVE,FRESNO, CA 93725

**PERMIT UNIT:** C-1074-5-4

#### **EQUIPMENT DESCRIPTION:**

WOOD AND FIBERGLASS TRIM GRINDING OPERATION CONSISTING OF A 12'W X 24'L X 9'H PARTS GRINDING BOOTH (BOOTH #3), 20 (20" X 20") FILTERS AND A 2 HP EXHAUST FAN

### PERMIT UNIT REQUIREMENTS

- All filters shall be properly maintained and must be in place during the grinding operation. [District Rule 4102]
- All equipment or systems installed or used to achieve compliance with the terms and conditions of this permit shall be maintained in good working order and be operated as efficiently as possible to minimize air pollution emissions. [District Rule 4102]
- Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally 3. Enforceable Through Title V Permit

These terms and conditions he Facility-wide Permit to Operate.

Facility Name: SANGER BOATS, INC.

Location: 3316 E ANNADALE AVE,FRESNO, CA 93725 C-1074-5-4 : Aug 19 2021 11:54AM – HONGM

**PERMIT UNIT:** C-1074-6-4

#### **EQUIPMENT DESCRIPTION:**

WOOD AND FIBERGLASS TRIM GRINDING OPERATION CONSISTING OF A 14'W X 48'L X 10'H SPRAY KING 200 GRINDING BOOTH (BOOTH #4), 18 (20" X 20") FILTERS AND A 2 HP EXHAUST FAN

### PERMIT UNIT REQUIREMENTS

- All filters shall be properly maintained and must be in place during the grinding operation. [District Rule 4102]
- All equipment or systems installed or used to achieve compliance with the terms and conditions of this permit shall be maintained in good working order and be operated as efficiently as possible to minimize air pollution emissions. [District Rule 4102]
- Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

These terms and conditions he Facility-wide Permit to Operate.

Facility Name: SANGER BOATS, INC.

Location: 3316 E ANNADALE AVE,FRESNO, CA 93725

**PERMIT UNIT:** C-1074-7-6

#### **EQUIPMENT DESCRIPTION:**

POLYESTER GEL COAT APPLICATION OPERATION TO MOLDS AND PATTERNS CONSISTING OF HVLP AND AIR-ASSISTED AIRLESS SPRAY GUNS, A 14'W X 26'L X 9'H DEVILBISS SPRAY BOOTH (BOOTH #6), 12 (24" X 20") FILTERS AND A 2 HP EXHAUST FAN

### PERMIT UNIT REQUIREMENTS

- Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
- All filters shall be properly maintained and must be in place during the gel coat operation. [District Rule 4102] 2.
- 3. VOC emissions from this gel coat application operation shall not exceed 97.6 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
- VOC emissions from gelcoats used shall be calculated as follows: Gelcoat Usage (gal/day) x Density of Gelcoat (lb/gal) x 1 ton/2000 lb x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table for styrene + Gelcoat Usage (gal/day) x Density of Gelcoat (lb/gal) x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table for MMA. [District Rule 2201] Federally Enforceable Through Title V Permit
- PM10 emissions from this resin and gel coat application operation shall not exceed 79.4 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
- PM10 emissions from gelcoats used shall be calculated as follows: Gelcoat Usage (gal/day) x Density of Gelcoat (lb/gal) x Solids Content (%, by weight) x 0.187. [District Rule 2201] Federally Enforceable Through Title V Permit
- Permittee shall calculate the fiberglass boat manufacturing facility emissions to demonstrate if the VOC emissions from all fiberglass boat manufacturing operations, including related solvent cleaning activities, at the facility are equal to or greater than 2.7 tons per 12-month rolling period, before consideration of controls. [District Rule 4684] Federally Enforceable Through Title V Permit
- Permittee shall not use materials in any open molding process that exceed the following weighted average monomer VOC content limits, in weight percent: production resin atomized (spray) - 28%; production resin non-atomized - 35%; pigmented gel coat - 33%; clear gel coat - 48%; tooling resin atomized - 30%; tooling resin non-atomized - 39%; or tooling gel coat - 40%. [District Rule 4684] Federally Enforceable Through Title V Permit
- The non-monomer VOC content of each resin and gel coat shall not constitute more than 5 percent by weight of the resin or gel coat. [District Rule 4684] Federally Enforceable Through Title V Permit
- 10. The weighted average monomer VOC content for each open molding resin or gel coat material used at this facility shall be determined based on a 12-month rolling average using Equation 1 of District Rule 4684: Weighted Average Monomer VOC Content = [Summation of (Mi x VOCi)] / [Summation of Mi]; where Mi = Mass of open molding resin or gel coat 'i' used in the past 12 months in an operation, in megagrams; and VOCi = Monomer VOC content, by weight percent, of open molding resin or gel coat 'i' used in the past 12 months in an operation. [District Rule 4684] Federally Enforceable Through Title V Permit

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

Facility Name: SANGER BOATS, INC.

Location: 3316 E ANNADALE AVE,FRESNO, CA 93725 C-1074-7-6 : Aug 19 2021 11:55AM - HONGM

- 11. Permittee shall ensure that all containers greater than 208 liters (55 gallons), including those used for on-site mixing of putties and polyputties, have a cover with no visible gaps in place at all times, except when material is being manually added or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container. [District Rule 4684] Federally Enforceable Through Title V Permit
- 12. The VOC content of organic solvents used in cleaning operations shall not exceed 25 g/l (0.21 lb/gal). [District Rule 4684] Federally Enforceable Through Title V Permit
- 13. Permittee shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in self-closing, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the containers are empty. [District Rule 4684] Federally Enforceable Through Title V Permit
- 14. Permittee shall keep records of the daily and cumulative annual (calendar year) VOC emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
- 15. Permittee shall maintain records, on a monthly basis, of the facility's 12-month rolling period VOC emissions from all fiberglass boat manufacturing operations, including related solvent cleaning activities, before consideration of controls. [District Rule 2520] Federally Enforceable Through Title V Permit
- 16. Permittee shall maintain records, on a monthly basis, of the weighted average monomer VOC content for each open molding resin or gel coat material used at this facility, determined based on a 12-month rolling average, using Equation 1 of District Rule 4684. [District Rule 2520] Federally Enforceable Through Title V Permit
- 17. Permittee shall maintain the following records: 1) Daily records of the type and quantity of all resins, gel coats, fillers, catalysts, and cleaning materials (including cleaning solvents) used in each operation; 2) Records of the VOC content, in weight percent, of all polyester resin and gel coat, filler materials, including the weight percent of non-monomer VOC content of the resin and gel coat, used or stored at the facility; and 3) Records of the VOC content of all cleaning materials used and stored at the facility as specified in Section 5.3 of District Rule 4684. [District Rules 2520 and 4684] Federally Enforceable Through Title V Permit
- 18. Permittee shall retain all records on site for a period of five years, shall make the records available on site during normal business hours to the District, ARB, or EPA, and shall submit the records to the District, ARB, or EPA upon request. [District Rules 2520 and 4684] Federally Enforceable Through Title V Permit

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

Facility Name: SANGER BOATS, INC.

Location: 3316 E ANNADALE AVE, FRESNO, CA 93725

C-1074-7-6 : Aug 19 2021 11:55AM -- HONG

**PERMIT UNIT:** C-1074-8-6

#### **EQUIPMENT DESCRIPTION:**

POLYESTER GEL COAT APPLICATION OPERATION TO MOLDS AND PATTERNS CONSISTING OF HVLP AND AIR-ASSISTED AIRLESS SPRAY GUNS, A 14'W X 26'L X 9'H DEVILBISS SPRAY BOOTH (BOOTH #7), 12 (24" X 20") FILTERS AND A 2 HP EXHAUST FAN

### PERMIT UNIT REQUIREMENTS

- Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
- All filters shall be properly maintained and must be in place during the gel coat operation. [District Rule 4102] 2.
- 3. VOC emissions from this gel coat application operation shall not exceed 97.6 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
- VOC emissions from gelcoats used shall be calculated as follows: Gelcoat Usage (gal/day) x Density of Gelcoat (lb/gal) x 1 ton/2000 lb x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table for styrene + Gelcoat usage (gal/day) x Density of gelcoat (lb/gal) x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table for MMA. [District Rule 2201] Federally Enforceable Through Title V Permit
- PM10 emissions from this resin and gel coat application operation shall not exceed 79.4 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
- PM10 emissions from gelcoats used shall be calculated as follows: Gelcoat Usage (gal/day) x Density of Gel Coat (lb/gal) x Solids Content (%, by weight) x 0.187. [District Rule 2201] Federally Enforceable Through Title V Permit
- Permittee shall calculate the fiberglass boat manufacturing facility emissions to demonstrate if the VOC emissions from all fiberglass boat manufacturing operations, including related solvent cleaning activities, at the facility are equal to or greater than 2.7 tons per 12-month rolling period, before consideration of controls. [District Rule 4684] Federally Enforceable Through Title V Permit
- Permittee shall not use materials in any open molding process that exceed the following weighted average monomer VOC content limits, in weight percent: production resin atomized (spray) - 28%; production resin non-atomized - 35%; pigmented gel coat - 33%; clear gel coat - 48%; tooling resin atomized - 30%; tooling resin non-atomized - 39%; or tooling gel coat - 40%. [District Rule 4684] Federally Enforceable Through Title V Permit
- The non-monomer VOC content of each resin and gel coat shall not constitute more than 5 percent by weight of the resin or gel coat. [District Rule 4684] Federally Enforceable Through Title V Permit
- 10. The weighted average monomer VOC content for each open molding resin or gel coat material used at this facility shall be determined based on a 12-month rolling average using Equation 1 of District Rule 4684: Weighted Average Monomer VOC Content = [Summation of (Mi x VOCi)] / [Summation of Mi]; where Mi = Mass of open molding resin or gel coat 'i' used in the past 12 months in an operation, in megagrams; and VOCi = Monomer VOC content, by weight percent, of open molding resin or gel coat 'i' used in the past 12 months in an operation. [District Rule 4684] Federally Enforceable Through Title V Permit

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

Facility Name: SANGER BOATS, INC.

Location: 3316 E ANNADALE AVE,FRESNO, CA 93725 C-1074-8-6 : Aug 19 2021 11:55AM - HONGM

- 11. Permittee shall ensure that all containers greater than 208 liters (55 gallons), including those used for on-site mixing of putties and polyputties, have a cover with no visible gaps in place at all times, except when material is being manually added or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container. [District Rule 4684] Federally Enforceable Through Title V Permit
- 12. The VOC content of organic solvents used in cleaning operations shall not exceed 25 g/l (0.21 lb/gal). [District Rule 4684] Federally Enforceable Through Title V Permit
- 13. Permittee shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in self-closing, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the containers are empty. [District Rule 4684] Federally Enforceable Through Title V Permit
- 14. Permittee shall keep records of the daily and cumulative annual (calendar year) VOC emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
- 15. Permittee shall maintain records, on a monthly basis, of the facility's 12-month rolling period VOC emissions from all fiberglass boat manufacturing operations, including related solvent cleaning activities, before consideration of controls. [District Rule 2520] Federally Enforceable Through Title V Permit
- 16. Permittee shall maintain records, on a monthly basis, of the weighted average monomer VOC content for each open molding resin or gel coat material used at this facility, determined based on a 12-month rolling average, using Equation 1 of District Rule 4684. [District Rule 2520] Federally Enforceable Through Title V Permit
- 17. Permittee shall maintain the following records: 1) Daily records of the type and quantity of all resins, gel coats, fillers, catalysts, and cleaning materials (including cleaning solvents) used in each operation; 2) Records of the VOC content, in weight percent, of all polyester resin and gel coat, filler materials, including the weight percent of non-monomer VOC content of the resin and gel coat, used or stored at the facility; and 3) Records of the VOC content of all cleaning materials used and stored at the facility as specified in Section 5.3 of District Rule 4684. [District Rules 2520 and 4684] Federally Enforceable Through Title V Permit
- 18. Permittee shall retain all records on site for a period of five years, shall make the records available on site during normal business hours to the District, ARB, or EPA, and shall submit the records to the District, ARB, or EPA upon request. [District Rules 2520 and 4684] Federally Enforceable Through Title V Permit

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

Facility Name: SANGER BOATS, INC.

Location: 3316 E ANNADALE AVE, FRESNO, CA 93725

C-1074-8-6 : Aug 19 2021 11:55AM -- HONGI

**PERMIT UNIT:** C-1074-9-6

EXPIRATION DAT

#### **EQUIPMENT DESCRIPTION:**

POLYESTER RESIN APPLICATION OPERATION TO WOOD COMPONENTS CONSISTING OF A DEVILBISS SPRAY BOOTH (BOOTH #8), 14 (20" X 20") FILTERS AND A 2 HP EXHAUST FAN

### PERMIT UNIT REQUIREMENTS

- All filters shall be properly maintained and must be in place during the resin operation. [District Rule 4102] 1.
- 2. VOC emissions from this polyester resin application operation shall not exceed 5.0 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
- VOC emissions from resins used shall be calculated as follows: Resin Usage (gal/day) x Density of Resin (lb/gal) x 1 ton/2000 lb x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table (lb/ton). [District Rule 2201] Federally Enforceable Through Title V Permit
- Permittee shall calculate the fiberglass boat manufacturing facility emissions to demonstrate if the VOC emissions from all fiberglass boat manufacturing operations, including related solvent cleaning activities, at the facility are equal to or greater than 2.7 tons per 12-month rolling period, before consideration of controls. [District Rule 4684] Federally Enforceable Through Title V Permit
- Permittee shall not use materials in any open molding process that exceed the following weighted average monomer VOC content limits, in weight percent: production resin atomized (spray) - 28%; production resin non-atomized - 35%; pigmented gel coat - 33%; clear gel coat - 48%; tooling resin atomized - 30%; tooling resin non-atomized - 39%; or tooling gel coat - 40%. [District Rule 4684] Federally Enforceable Through Title V Permit
- The non-monomer VOC content of each resin and gel coat shall not constitute more than 5 percent by weight of the resin or gel coat. [District Rule 4684] Federally Enforceable Through Title V Permit
- The weighted average monomer VOC content for each open molding resin or gel coat material used at this facility shall be determined based on a 12-month rolling average using Equation 1 of District Rule 4684: Weighted Average Monomer VOC Content = [Summation of (Mi x VOCi)] / [Summation of Mi]; where Mi = Mass of open molding resin or gel coat 'i' used in the past 12 months in an operation, in megagrams; and VOCi = Monomer VOC content, by weight percent, of open molding resin or gel coat 'i' used in the past 12 months in an operation. [District Rule 4684] Federally Enforceable Through Title V Permit
- Permittee shall ensure that all containers greater than 208 liters (55 gallons), including those used for on-site mixing of putties and polyputties, have a cover with no visible gaps in place at all times, except when material is being manually added or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container. [District Rule 4684] Federally Enforceable Through Title V Permit
- The VOC content of organic solvents used in cleaning operations shall not exceed 25 g/l (0.21 lb/gal). [District Rule 4684] Federally Enforceable Through Title V Permit
- 10. Permittee shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in self-closing, non-absorbent and nonleaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the containers are empty. [District Rule 4684] Federally Enforceable Through Title V Permit

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

Facility Name: SANGER BOATS, INC.

Location: 3316 E ANNADALE AVE,FRESNO, CA 93725 C-1074-9-6 : Aug 19 2021 11:55AM -- HONGM

- 11. Permittee shall keep records of the daily and cumulative annual (calendar year) VOC emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. Permittee shall maintain records, on a monthly basis, of the facility's 12-month rolling period VOC emissions from all fiberglass boat manufacturing operations, including related solvent cleaning activities, before consideration of controls. [District Rule 2520] Federally Enforceable Through Title V Permit
- 13. Permittee shall maintain records, on a monthly basis, of the weighted average monomer VOC content for each open molding resin or gel coat material used at this facility, determined based on a 12-month rolling average, using Equation 1 of District Rule 4684. [District Rule 2520] Federally Enforceable Through Title V Permit
- 14. Permittee shall maintain the following records: 1) Daily records of the type and quantity of all resins, gel coats, fillers, catalysts, and cleaning materials (including cleaning solvents) used in each operation; 2) Records of the VOC content, in weight percent, of all polyester resin and gel coat, filler materials, including the weight percent of non-monomer VOC content of the resin and gel coat, used or stored at the facility; and 3) Records of the VOC content of all cleaning materials used and stored at the facility as specified in Section 5.3 of District Rule 4684. [District Rules 2520 and 4684] Federally Enforceable Through Title V Permit
- 15. Permittee shall retain all records on site for a period of five years, shall make the records available on site during normal business hours to the District, ARB, or EPA, and shall submit the records to the District, ARB, or EPA upon request. [District Rules 2520 and 4684] Federally Enforceable Through Title V Permit

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

Facility Name: SANGER BOATS, INC.

Location: 3316 E ANNADALE AVE,FRESNO, CA 93725

C-1074-9-6 : Aug 19 2021 11:55AM -- HONG

**PERMIT UNIT:** C-1074-11-6

EXPIRATION DAT

### **EQUIPMENT DESCRIPTION:**

WOODWORKING OPERATION WITH ONE (1) RADIAL ARM SAW, ONE (1) TABLE SAW, SERVED BY A 1,200 CFM LMC 160-IRI-A DUST COLLECTOR, AND ONE (1) ROUTER SERVED BY A 6,000 CFM DUST TECHNOLOGY MODEL DT-150 DUST COLLECTOR

### PERMIT UNIT REQUIREMENTS

- PM10 emissions from the dust collectors shall not exceed 0.004 gr/dscf. [District Rules 2201 and 4201] Federally Enforceable Through Title V Permit
- Visible emissions from any dust collectors shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
- Visible emissions shall be inspected quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520] Federally Enforceable Through Title V Permit
- Dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
- Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
- The appropriate dust collector exhaust fan shall be switched on prior to the start-up of any woodworking equipment. [District Rule 2201] Federally Enforceable Through Title V Permit
- All ducting and control equipment shall be in good working order to prevent fugitive particulate emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
- All filters shall be properly maintained and must be in place during the woodworking operation(s). [District Rule 2201] Federally Enforceable Through Title V Permit
- Each dust collector cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
- 10. At least one replacement filter for each dust collector shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
- 11. Material removed from dust collectors shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. All material that becomes deposited on the ground or any part of the dust collection system as a result of collection or material removal shall be cleaned up immediately. [District Rule 2201] Federally Enforceable Through Title V Permit
- 13. Records of dust collector maintenance, inspections, and repairs shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520] Federally Enforceable Through Title V Permit

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

Facility Name: SANGER BOATS, INC.

3316 E ANNADALE AVE, FRESNO, CA 93725 Location:

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

> These terms and conditions a re part of the Facility-wide Permit to Operate.

Facility Name: SANGER BOATS, INC.
Location: 3316 E ANNADALE AVE,FRESNO, CA 93725
C-1074-11-6: Sep 14 2021 1:11PM - HONGM

**PERMIT UNIT:** C-1074-12-6

EXPIRATION DATE: 04/30/2021

### **EQUIPMENT DESCRIPTION:**

ADHESIVE OPERATION WITH A 15 HP COMPRESSOR AND HIGH VOLUME LOW PRESSURE (HVLP) SPRAY EQUIPMENT

# PERMIT UNIT REQUIREMENTS

- 1. VOC emissions from this adhesive application operation shall not exceed 2.0 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. VOC emissions from adhesives used shall be calculated as follows: Adhesive Usage (gal/day) x VOC Content (lb/gal) x 0.25. [District Rule 2201] Federally Enforceable Through Title V Permit
- 3. PM10 emissions from the spray application of adhesive shall not exceed 3.7 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 4. PM10 emissions from adhesives used shall be calculated as follows: Adhesive Usage (gal/day) x Density of Adhesive (lb/gal) x Solids Content (%, by weight) x 0.25. [District Rule 2201] Federally Enforceable Through Title V Permit
- The VOC content of adhesive products used for specific applications shall not exceed the following limits, expressed as grams of VOC per liter of adhesive product, excluding water and exempt compounds, or grams of VOC per liter of material for low-solids adhesive products, as applied, except where specified elsewhere on this permit: multipurpose construction, 70 g/l; ceramic tile adhesive, 65 g/l; cove base installation, 50 g/l; dry wall and/or panel adhesive, 50 g/l; floor covering installation, 150 g/l; ceramic floor tile installation, 65 g/l; indoor carpet adhesive, 50 g/l; carpet pad adhesive, 50 g/l; outdoor carpet adhesive, 150 g/l; rubber flooring adhesive, 60 g/l; perimeter bonded sheet flooring installation, 660 g/l; subfloor adhesive, 50 g/l; VCT and asphalt tile adhesive, 50 g/l; wood flooring adhesive, 100 g/l; single-ply roof material installation, 250 g/l; non-membrane roof adhesive, 300 g/l; structural glazing, 100 g/l; structural wood member adhesive, 140 g/l; contact adhesive, 80 g/l; specialty contact adhesive, 250 g/l; rubber vulcanization adhesive/primer, 850 g/l; tire retread adhesive, 100 g/l; motor vehicle adhesive, 250 g/l; motor vehicle weatherstrip adhesive, 750 g/l; traffic marking tape adhesive/primer, 150 g/l; top and trim adhesive, 540 g/l; waterproof resorcinol glue, 170 g/l; staple and nail manufacturing, 640 g/l; thin metal laminating adhesive, 780 g/l; elastomeric adhesive, 750 g/l; flexible vinyl adhesive, 250 g/l; ABS welding adhesive, 325 g/l; cellulosic plastic welding adhesive, 100 g/l; CPVC welding adhesive, 490 g/l; PVC welding adhesive, 510 g/l; styrene-acrylonitrile welding adhesive, 100 g/l; plastic cement welding adhesive primer, 400 g/l; other plastic cement welding adhesives, 250 g/l; automotive glass primer, 700 g/l; adhesive primer, 250 g/l. [District Rule 4653] Federally Enforceable Through Title V Permit
- 6. The VOC content of adhesive products, except as provided elsewhere on this permit, shall not exceed the following limits, expressed as grams of VOC per liter of adhesive product, excluding water and exempt compounds, or grams of VOC per liter of material for low-solids adhesive products, as applied: metal to metal, 30 g/l; porous materials, 50 g/l; plastic foam, 50 g/l; wood, 30 g/l; pre-formed rubber products, 250 g/l; reinforced plastic composite, 200 g/l; fiberglass, 80 g/l; all other substrates, 250 g/l. The higher of the two limits applies to the bonding of two dissimilar substrates. [District Rule 4653] Federally Enforceable Through Title V Permit

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

Facility Name: SANGER BOATS, INC.

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- 7. The VOC content of sealant products used for specific applications shall not exceed the following limits, expressed as grams of VOC per liter of sealant product, excluding water and exempt compounds, or grams of VOC per liter of material for low-solids sealant products, as applied: architectural, 250 g/l; marine deck, 760 g/l; non-membrane roof, 300 g/l; roadway, 250 g/l; single-ply roof membrane, 450 g/l; other sealants, 420 g/l. [District Rule 4653] Federally Enforceable Through Title V Permit
- 8. The VOC content of sealant primers used for specific applications shall not exceed the following limits, expressed as grams of VOC per liter of sealant product, excluding water and exempt compounds, or grams of VOC per liter of material for low-solids sealant products, as applied: architectural non-porous, 250 g/l; architectural porous, 775 g/l; modified bituminous, 500 g/l; marine deck, 760 g/l; other sealant primers, 750 g/l. [District Rule 4653] Federally Enforceable Through Title V Permit
- 9. The permittee shall only use the following equipment to apply adhesives and sealants: electrostatic application; flow coater; roll coater; dip coater; hand application methods; airless spray; HVLP spray; any other application method that demonstrates, to the satisfaction of the APCO and EPA, a coating transfer efficiency equivalent to or greater than the efficiency achieved by HVLP spray; or air-atomized spray (only for the application of contact adhesives or specialty contact adhesives). [District Rule 4653] Federally Enforceable Through Title V Permit
- 10. High-Volume, Low-Pressure (HVLP) spray equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4653] Federally Enforceable Through Title V Permit
- 11. For HVLP spray guns manufactured prior to January 1, 1996, the end user shall demonstrate that the gun meets HVLP spray equipment standards. Satisfactory proof will be either in the form of manufacturer's published material or by a demonstration using a certified air pressure tip gauge, measuring the air atomizing pressure dynamically at the center of the air cap and at the air horns. [District Rule 4653] Federally Enforceable Through Title V Permit
- 12. The permittee shall store or dispose of adhesive products, sealant products, catalysts, thinners, fresh or spent solvents, and waste solvent materials such as cloth, paper, etc., 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 containers are empty. The containers used for disposal of adhesive materials, solvents, or any unused VOC-containing materials shall be self-closing. [District Rule 4653] Federally Enforceable Through Title V Permit
- 13. The permittee shall ensure that mixing containers for used VOC-containing adhesive products, sealant products, and process-related waste materials are kept closed at all times except when depositing or removing these materials. [District Rule 4653] Federally Enforceable Through Title V Permit
- 14. The permittee shall minimize spills of VOC-containing adhesive products, sealant products, and process-related waste materials. [District Rule 4653] Federally Enforceable Through Title V Permit
- 15. The permittee shall convey VOC-containing adhesive products, sealant products, and process-related waste materials from one location to another in closed containers or pipes. [District Rule 4653] Federally Enforceable Through Title V Permit
- 16. VOC content of organic solvents used in cleaning operations shall not exceed any of the following limits: general product cleaning during manufacturing process or surface preparation for adhesive applications: 25 g/l (0.21 lb/gal), surface preparation cleaning prior to rubber vulcanization: 850 g/l (7.1 lb/gal), repair and maintenance cleaning: 25 g/l (0.21 lb/gal), and cleaning of adhesive application equipment: 25 g/l (0.21 lb/gal). [District Rule 4653] Federally Enforceable Through Title V Permit
- 17. Cleaning activities that use solvents, including performing surface preparation cleaning prior to rubber vulcanization with a VOC content greater than 25 g/l (0.21 lb/gallon), shall be performed by one or more of the following methods: wipe cleaning; or application of solvent from hand-held spray containers from which solvents are dispensed without a propellant-induced force; or non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4653] Federally Enforceable Through Title V Permit PERMITURE ON NEXT PAGE

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

Facility Name: SANGER BOATS, INC.

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- 18. Solvent shall not be atomized into the open air. This provision shall not apply to the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers. [District Rule 4653] Federally Enforceable Through Title V Permit
- 19. Permittee shall not use VOC-containing materials to clean spray equipment used for the application of coatings, adhesives, or ink, unless an enclosed system or equipment that is proven to equally effective at controlling emissions is used for cleaning. If an enclosed system is used, it must totally enclose spray guns, cups, nozzles, bowls, and other parts during washing, rinsing and draining procedures, and it must be used according to the manufacturer's recommendations and must be closed when not in use. [District Rule 4653] Federally Enforceable Through Title V Permit
- 20. The permittee shall implement the following work practices when participating in organic solvent cleaning activities: 1) minimize spills of VOC-containing cleaning materials; 2) convey VOC-containing cleaning materials from one location to another in closed containers or pipes; and 3) minimize VOC emissions from cleaning of application, storage, mixing, and conveying equipment by ensuring that the equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers. [District Rule 4653] Federally Enforceable Through Title V Permit
- 21. Permittee shall store or dispose of cleaning materials, fresh or spent solvents, and waste solvent materials such as cloth, paper, etc., 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 containers are empty. The containers used for disposal of adhesive materials, solvents, or any unused VOC containing materials shall be self-closing. [District Rule 4653] Federally Enforceable Through Title V Permit
- 22. Each container of adhesive product and sealant product subject to District Rule 4653 shall display the maximum VOC content of the adhesive product or sealant product as applied. The VOC content shall be displayed as grams of VOC per liter of adhesive product or sealant product, excluding water and exempt compounds, or grams of VOC per liter of material for low-solids adhesive products. Each container of solvent subject to District Rule 4653 shall display the maximum VOC content (in grams of VOC per liter of material) as applied. [District Rule 4653] Federally Enforceable Through Title V Permit
- 23. Each container of adhesive product or sealant product subject to District Rule 4653 shall display a statement of the manufacturer's recommendations regarding thinning, reducing, or mixing of the adhesive product with any other VOC containing material. Mixing recommendations shall specify a ratio which results in a compliant, as applied, adhesive product, or sealant product. [District Rule 4653] Federally Enforceable Through Title V Permit
- 24. Permittee shall keep records of the daily VOC and PM10 emissions and cumulative annual (calendar year) VOC emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
- 25. The permittee shall maintain records of the following: 1) the VOC content, in grams VOC per liter, of all adhesive materials used and stored at the stationary source; 2) the VOC content of all solvents used and stored at the stationary source; and 3) the VOC content, in grams VOC per liter, of all sealant materials used and stored at the stationary source. [District Rule 4653] Federally Enforceable Through Title V Permit
- 26. The permittee shall keep a copy of the manufacturer's product data sheet or material safety data sheet of the solvents used for cleaning activities, and shall maintain a current list of solvents that are being used for organic solvent cleaning activities. The list shall include the following information: a) the name of the solvent and its manufacturer's name; b) the VOC content of the solvent expressed in grams/liter or lb/gallon; c) When the solvent is a mixture of different materials that are blended by the operator, 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, as applied; d) the type of cleaning activity for each solvent that is being used in accordance with the applicable cleaning category specified in Rule 4653; and e) the quantity of solvents used for cleaning operations on a daily basis. [District Rule 4653] Federally Enforceable Through Title V Permit
- 27. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 1070, 2520, and 4653] Federally Enforceable Through Title V Permit

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

Facility Name: SANGER BOATS, INC.

Location: 3316 E ANNADALE AVE,FRESNO, CA 93725

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# **ATTACHMENT B**

Previous Title V Operating Permit

**FACILITY:** C-1074-0-4 **EXPIRATION DATE:** 04/30/2021

### **FACILITY-WIDE REQUIREMENTS**

- 1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 2. Facility-wide volatile organic compound (VOC) emissions shall be less than 50,000 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit
- 3. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
- 4. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
- 5. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
- 6. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020. [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
- 7. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.12.1] Federally Enforceable Through Title V Permit
- 8. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District Rule 2031 Federally Enforceable Through Title V Permit
- 9. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
- 10. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: SANGER BOATS, INC.

- 11. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 12. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
- 13. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
- 14. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
- 15. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
- 16. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
- 17. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
- 18. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
- 19. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
- 20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
- 21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
- 22. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
- 23. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit

- 24. 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 (2/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
- 25. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in the Table of Standards of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601] Federally Enforceable Through Title V Permit
- 26. All VOC-containing materials for architectural coatings subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601] Federally Enforceable Through Title V Permit
- 27. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601] Federally Enforceable Through Title V Permit
- 28. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
- 29. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
- 30. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR 82, Subpart B. [40 CFR 82, Subpart B] Federally Enforceable Through Title V Permit
- 31. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/04) or Rule 8011 (8/19/04). [District Rule 8021 and 8011] Federally Enforceable Through Title V Permit
- 32. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/04) or Rule 8011 (8/19/04). [District Rule 8031 and 8011] Federally Enforceable Through Title V Permit
- 33. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/04) or Rule 8011 (8/19/04). [District Rule 8041 and 8011] Federally Enforceable Through Title V Permit
- 34. Whenever open areas are disturbed or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/04) or Rule 8011 (8/19/04). [District Rule 8051 and 8011] Federally Enforceable Through Title V Permit
- 35. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/04) or Rule 8011 (8/19/04). [District Rule 8061 and Rule 8011] Federally Enforceable Through Title V Permit
- 36. Any unpaved vehicle/equipment area that anticipates more than 75 vehicle trips per day shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 100 vehicle trips per day shall comply with the requirements of Section 5.1.2 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/04) or Rule 8011 (8/19/04). [District Rule 8071 and Rule 8011] Federally Enforceable Through Title V Permit

- 37. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit
- 38. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
- 39. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V
- 40. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V
- 41. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), and Rule 111 (Kern, Tulare, Kings). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 42. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601, sections 5.1, 5.2, 5.3, and 5.8 (12/17/09); 8021 (8/19/04); 8031 (8/19/04); 8041 (8/19/04); 8051 (8/19/04); 8061 (8/19/04); and 8071 (9/16/04). A permit shield is granted from these requirements. [District Rule 2520] Federally Enforceable Through Title V Permit
- 43. Permittee shall demonstrate compliance with the organic Hazardous Air Pollutant (HAP) emission limit requirements of 40 CFR 63, Subpart VVVV (National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing) using the compliant materials option or the emissions averaging option. Compliance using either option shall be demonstrated on a 12-month rolling-average basis and shall be determined at the end of every month (12 times per year). The first 12 month period begins on August 23, 2004. [40 CFR 63.5701, 40 CFR 63.5710(a) and 40 CFR 63.5713(a)] Federally Enforceable Through Title V Permit
- 44. While using the compliant materials option, the organic HAP content limits, by weight, are listed as follows: Production resin applied with atomization - 28%; Production resin applied with nonatomization - 35%; pigmented gel coat applied with any method - 33%; clear gel coat applied with any method - 48%; tooling resin applied with atomization - 30%; tooling resin applied with nonatomization - 39%; or tooling gel coat applied with any method -40%. [40 CFR 63.5713(a)] Federally Enforceable Through Title V Permit
- 45. While using the compliant materials option, compliance shall be demonstrated if each of the resins and gel coats used by a facility have organic HAP contents no greater than the applicable organic HAP content limits specified above. If any of the resins or gel coats used by a facility have organic HAP contents greater than the applicable organic HAP content limits specified above, the permittee shall demonstrate compliance for that specific gel coat or resin category by using Equation 1 of 40 CFR 63.5713(c): Weighted-Average HAP Content (%) = [summation of (Mi x HAPi)] [summation of Mi], where Mi = mass of open molding resin or gel used in the past 12 months, in megagrams; and HAPi = the organic HAP content, by weight percent, of each open molding resin or gel coat used in the past 12 months. If the weighted-average HAP content exceeds the applicable organic HAP content limits specified above, compliance has not been demonstrated using the compliant materials option. [40 CFR 63.5713] Federally Enforceable Through Title V Permit

- 46. While using the emissions averaging option, the permittee shall use Equation 1 of 40 CFR 63.5710(b) to demonstrate that the organic HAP emissions from this facility do not exceed the organic HAP emission limit determined by Equation 1 of 40 CFR 63.5698(b), for the same 12-month period. If the result of Equation 1 of 40 CFR 63.5710(b) is greater than the result of Equation 1 of 40 CFR 63.5698(b), compliance has not been demonstrated using the emissions averaging option. [40 CFR 63.5710(b)] Federally Enforceable Through Title V Permit
- 47. While using the emissions averaging option, the organic HAP emissions from this facility shall not exceed the limit established by Equation 1 of 40 CFR 63.5698(b): HAP Limit = [(46 x Mr) + (159 x Mpg) + (291 x Mcg) + (54 x Mtr)]+ (214 x Mtg)], where Mr = mass of production resins used in the past 12 months; Mpg = mass of pigmented gel coats used in the past 12 months; Mcg = mass of clear gel coats used in the past 12 months; Mtr = mass of tooling resins used in the past 12 months: and Mtg = mass of tooling gel coats used in the past 12 months. All units are in megagrams. [40 CFR 63.5698(b)] Federally Enforceable Through Title V Permit
- 48. While using the emissions averaging option, the permittee shall calculate actual HAP emissions from the preceding 12 months using Equation 1 of 40 CFR 63.5710(b): Actual HAP Emissions = (PVr x Mr) + (PVpg x Mpg) + (PVcg x Mcg) + (PVtr x Mtr) + (PVtg x Mtg), where PVr = weighted-average MACT model point value for production resin used in the past 12 months; Mr = mass of production resin used in the past 12 months; PVpg = weighted-average MACT model point value for pigmented gel coat used in the past 12 months; Mpg = mass of pigmented gel coats used in the past 12 months; PVcg = weighted-average MACT model point value for clear gel coat used in the past 12 months; Mcg = mass of clear gel coats used in the past 12 months; PVtr = weighted-average MACT model point value for tooling resin used in the past 12 months; Mtr = mass of tooling resins used in the past 12 months: PVtg = weightedaverage MACT model point value for tooling gel coat used in the past 12 months; and Mtg = mass of tooling gel coats used in the past 12 months. All mass units are in megagrams and all weighted-average MACT model point values are in kilograms per megagram. [40 CFR 63.5710(b)] Federally Enforceable Through Title V Permit
- 49. While using the emissions averaging option, the weighted-average MACT point values for each resin or gel coat used by this facility shall be determined using Equation 2 of 40 CFR 63.5710(c): Weighted-Average MACT Point Value (PVr, PVpg, PVcg, PVtr and PVtg) = [summation of (Mi x PVi)] / [summation of Mi], where Mi = mass of each resin or gel coat used within the past 12 months, in megagrams; and PVi = MACT model point value for each resin or gel coat used within the past 12 months, in kilograms of HAP per megagram of material applied. [40 CFR 63.5710(c)] Federally Enforceable Through Title V Permit
- 50. While using the emissions averaging option, the MACT model point values for all resins and gel coats applied shall be determined using the formulas listed in Table 3 of 40 CFR 63, Subpart VVVV: atomized resin - [0.014 x (Resin HAP%, by weight)^2.425]; atomized resin, plus vacuum bagging with roll out - [0.01185 x (Resin HAP%, by weight)<sup>2</sup>.425]; atomized resin, plus vacuum bagging without roll out - [0.00945 x (Resin HAP%, by weight)<sup>2</sup>.425]; nonatomized resin - [0.014 x (Resin HAP%, by weight)^2.275]; nonatomized resin, plus bagging with roll out -[0.0110 x (Resin HAP%, by weight)^2.275; nonatomized resin, plus bagging without roll out - [0.0076 x (Resin HAP%, by weight)^2.275. [40 CFR 63.5710(d)] Federally Enforceable Through Title V Permit
- 51. All gel coat and resin mixing containers with a capacity equal to or greater than 55 gallons, including those used for on-site mixing of putties and polyputties shall have a cover. The covers shall have no visible gaps and shall be in place at all times, except when material is being manually added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container. [40 CFR 63.5731(a)(b)] Federally Enforceable Through Title V Permit
- 52. For routine flushing or resin and gel coat application equipment (e.g. spray guns, flowcoaters, brushes, rollers, and squeegees), permittee shall use cleaning solvents that contain no more than 5% organic HAP, by weight. For removal of cured resin and gel coat from application equipment, no organic HAP content limit applies. [40 CFR 63.5734(a)] Federally Enforceable Through Title V Permit
- 53. Organic HAP-containing solvents used for removing cured resin or gel coat shall be stored in containers with covers. The covers must have no visible gaps and shall be in place at all times, except when equipment to cleaned is placed in or removed from the container. On containers with a capacity greater than 2 gallons, the distance from the top of the container to the solvent surface must be equal to or greater than 0.75 times the diameter of the container. [40 CFR 63.5734(b)] Federally Enforceable Through Title V Permit

- 54. At least once per month, 55 gallon or greater mixing containers and all containers holding organic HAP containing solvents used for removing cured resin or gel coat must be inspected to ensure the covers have no visible gaps. Records of the inspections and any repairs made to the covers must be kept. [40 CFR 63.5731(c)(d) and 63.5737(c)] Federally Enforceable Through Title V Permit
- 55. Permittee shall use adhesives that contain no more than 5% by weight of organic HAP content for all carpet and fabric operations. [40 CFR 63.5740(a)] Federally Enforceable Through Title V Permit
- 56. Permittee shall maintain a record of the organic HAP content of cleaning solvents used for routine cleaning of resin and gel coat application equipment and adhesives used for all carpet and fabric operations. [40 CFR 63.5737(a) and 63.5740(b)] Federally Enforceable Through Title V Permit
- 57. Permittee shall determine HAP content of affected materials using one or more of the methods outlined in 40 CFR 63.5758. [40 CFR 63.5758] Federally Enforceable Through Title V Permit
- 58. Permittee shall submit a notification of compliance status to the District no later than 30 days after the end of the first 12-month averaging period. The notification shall include the following: type and quantity of HAP's emitted at the facility; the method used to determine compliance; the method that will be used to determine continuing compliance; and a statement by the permittee as to whether the facility has complied with the HAP content limits. If there is a change to information submitted in the notification, changes shall be submitted in writing within 15 days after the change. [40 CFR 63.5761] Federally Enforceable Through Title V Permit
- 59. Permittee shall submit a compliance report to the District every 6 months. The first compliance report shall be submitted no later than 60 days after 12/31/05. Each subsequent report shall cover the applicable semiannual reporting period from January 1 through June 30 or from July 1 through December 31. Each subsequent compliance report shall be submitted no later than 60 days after the end of the semiannual reporting period. [40 CFR 63.5764(b)] Federally Enforceable Through Title V Permit
- 60. The compliance report shall include the following information: (1) Company name and address; (2) Signed and dated statement by a responsible official certifying the truth, accuracy, and completeness of the report; (3) Dates covered by the compliance report; (4) Description of any changes in the manufacturing process since the last compliance report; (5) Table or statement showing, for each regulated operation, the applicable organic HAP content limit and application equipment requirement with which the facility is complying and the actual weighted-average organic HAP content for each operation during each of the rolling 12-month averaging periods that end during the reporting period; (6) If compliance is achieved during the reporting period, a statement indicating such effect shall be included with the report; and (7) If any of the regulated operations were not in compliance during the reporting period, the following shall be included with the semiannual compliance report: (i) Operation(s) involved in the deviation; (ii) quantity, organic HAP content, and application method of the materials involved in the deviation; (iii) actions taken to minimize the deviation and to prevent it in the future; and (iv) Statement of whether or not the facility was in compliance for the 12-month averaging period that ended at the end of the reporting period. [40 CFR 63.5764(c)] Federally Enforceable Through Title V Permit
- 61. The following exemptions apply to the gel coat and resin operations: (1) Gel coat materials used for part/mold repair and touch up shall be exempt from the organic HAP content limits. The total gel coat materials used in this exemption shall not exceed 1 percent by weight of all gel coat used at the facility on a 12-month rolling-average basis. Records shall be kept of the amount of gel coats used per month for which this exemption is being used and copies of calculations showing that the exempt amount does not exceed 1 percent of all gel coat used. (2) Pure 100% vinylester resin used for skin coats. The total resin materials included in the exemption shall not exceed 5% by weight of all resin used at the facility on a 12-month rolling-average basis. Records shall be kept of the amount of 100 percent vinylester skin coat used per month for which this exemption is being used and copies of calculations showing that the exempt amount does not exceed 5% percent of all resin used. [40 CFR 63.5698(d)] Federally Enforceable Through Title V Permit

- 62. Permittee shall maintain the following records, in addition to those records required by conditions of this permit: (1) a copy of each notification and report submitted to the District; (2) Support documentation for any notice or report submitted to the District; (3) Total amounts of each production resin, pigmented gel coat, clear gel coat, tooling resin, and tooling gel coat used per month and the weighted-average organic HAP content for each category of material, expressed as weight percent (this record is not required if all materials used comply with the organic HAP content requirements); (4) for production resin and tooling resin the amounts of each applied by atomized or nonatomized methods. [40 CFR 63.5767] Federally Enforceable Through Title V Permit
- 63. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin on January 1 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

**PERMIT UNIT:** C-1074-1-6 EXPIRATION DATE: 04/30/2021

#### **EQUIPMENT DESCRIPTION:**

POLYESTER RESIN AND FIBERGLASS APPLICATION OPERATION TO HULL MOLDS FOR THE MANUFACTURE OF BOATS CONSISTING OF HVLP, NON-ATOMIZING FLOW COATER APPLICATOR(S), FIVE 1.5 HP EXHAUST FANS, ONE 7.5 HP EXHAUST FAN AND TWO 15 HP COMPRESSORS

### PERMIT UNIT REQUIREMENTS

- All exhaust fans shall be on prior to the start of and during polyester resin and fiberglass application. [District Rule 2201] Federally Enforceable Through Title V Permit
- VOC emissions from this polyester resin application operation shall not exceed 77.0 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
- VOC emissions from resins used shall be calculated as follows: Resin Usage (gal/day) x Density of Resin (lb/gal) x 1 ton/2000 lb x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table (lb/ton). [District Rule 2201] Federally Enforceable Through Title V Permit
- The monomer (VOC) content of polyester resins used shall be less than or equal to 35%, by weight. [District Rule 2201] Federally Enforceable Through Title V Permit
- Permittee shall calculate the fiberglass boat manufacturing facility emissions to demonstrate if the VOC emissions from all fiberglass boat manufacturing operations, including related solvent cleaning activities, at the facility are equal to or greater than 2.7 tons per 12-month rolling period, before consideration of controls. [District Rule 4684] Federally Enforceable Through Title V Permit
- Permittee shall not use materials in any open molding process that exceed the following weighted average monomer VOC content limits, in weight percent: production resin atomized (spray) - 28%; production resin non-atomized - 35%; pigmented gel coat - 33%; clear gel coat - 48%; tooling resin atomized - 30%; tooling resin non-atomized - 39%; or tooling gel coat - 40%. [District Rule 4684] Federally Enforceable Through Title V Permit
- The non-monomer VOC content of each resin and gel coat shall not constitute more than 5 percent by weight of the resin or gel coat. [District Rule 4684] Federally Enforceable Through Title V Permit
- The weighted average monomer VOC content for each open molding resin or gel coat material used at this facility shall be determined based on a 12-month rolling average using Equation 1 of District Rule 4684: Weighted Average Monomer VOC Content = [Summation of (Mi x VOCi)] / [Summation of Mi]; where Mi = Mass of open molding resin or gel coat 'i' used in the past 12 months in an operation, in megagrams; and VOCi = Monomer VOC content, by weight percent, of open molding resin or gel coat 'i' used in the past 12 months in an operation. [District Rule 4684] Federally Enforceable Through Title V Permit
- Permittee shall ensure that all containers greater than 208 liters (55 gallons), including those used for on-site mixing of putties and polyputties, have a cover with no visible gaps in place at all times, except when material is being manually added or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container. [District Rule 4684] Federally Enforceable Through Title V Permit
- 10. Application of any polyester resin material shall only be performed by one of the following methods: 1) non-atomized spray technique; 2) flowcoaters; 3) pressure-fed rollers; 4) resin impregnators; 5) hand layup; or 6) any equivalent method as approved by the APCO. [District Rule 2201] Federally Enforceable Through Title V Permit

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

Facility Name: SANGER BOATS, INC.

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- 11. The VOC content of organic solvents used in cleaning operations shall not exceed 25 g/l (0.21 lb/gal). [District Rule 4684] Federally Enforceable Through Title V Permit
- 12. Permittee shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in self-closing, non-absorbent and nonleaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the containers are empty. [District Rule 4684] Federally Enforceable Through Title V Permit
- 13. Permittee shall keep records of the daily and cumulative annual (calendar year) VOC emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
- 14. Permittee shall maintain records, on a monthly basis, of the facility's 12-month rolling period VOC emissions from all fiberglass boat manufacturing operations, including related solvent cleaning activities, before consideration of controls. [District Rule 2520] Federally Enforceable Through Title V Permit
- 15. Permittee shall maintain records, on a monthly basis, of the weighted average monomer VOC content for each open molding resin or gel coat material used at this facility, determined based on a 12-month rolling average, using Equation 1 of District Rule 4684. [District Rule 2520] Federally Enforceable Through Title V Permit
- 16. Permittee shall maintain the following records: 1) Daily records of the type and quantity of all resins, gel coats, fillers, catalysts, and cleaning materials (including cleaning solvents) used in each operation; 2) Records of the VOC content, in weight percent, of all polyester resin and gel coat, filler materials, including the weight percent of non-monomer VOC content of the resin and gel coat, used or stored at the facility; and 3) Records of the VOC content of all cleaning materials used and stored at the facility as specified in Section 5.3 of District Rule 4684. [District Rules 2520 and 4684] Federally Enforceable Through Title V Permit
- 17. Permittee shall retain all records on site for a period of five years, shall make the records available on site during normal business hours to the District, ARB, or EPA, and shall submit the records to the District, ARB, or EPA upon request. [District Rules 2520 and 4684] Federally Enforceable Through Title V Permit

**PERMIT UNIT:** C-1074-2-5 **EXPIRATION DATE:** 04/30/2021

#### **EQUIPMENT DESCRIPTION:**

POLYESTER GEL COAT APPLICATION OPERATION TO MOLDS CONSISTING OF HVLP AND AIR-ASSISTED AIRLESS SPRAY GUNS, A 14'W X 26'L X 9'H DEVILBISS SPRAY BOOTH (BOOTH #1), 14 (20" X 20") FILTERS, AND A 2 HP EXHAUST FAN

## PERMIT UNIT REQUIREMENTS

- Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
- All filters shall be properly maintained and must be in place during the gel coat operation. [District Rule 4102] 2.
- 3. VOC emissions from this gel coat application operation shall not exceed 20.2 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
- VOC emissions from gelcoats shall be calculated as follows: Gelcoat Usage (gal/day) x Density of gelcoat (lb/gal) x 1 ton/2000 lb x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table for styrene + Gelcoat usage (gal/day) x Density of gelcoat (lb/gal) x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table for MMA. [District Rule 2201] Federally Enforceable Through Title V Permit
- PM10 emissions from this gel coat application operation shall not exceed 15.8 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
- PM10 emissions from gelcoats used shall be calculated as follows: Gelcoat Usage (gal/day) x Density of Gelcoat (lb/gal) x Solids Content (%, by weight) x 0.187. [District Rule 2201] Federally Enforceable Through Title V Permit
- Permittee shall calculate the fiberglass boat manufacturing facility emissions to demonstrate if the VOC emissions from all fiberglass boat manufacturing operations, including related solvent cleaning activities, at the facility are equal to or greater than 2.7 tons per 12-month rolling period, before consideration of controls. [District Rule 4684] Federally Enforceable Through Title V Permit
- Permittee shall not use materials in any open molding process that exceed the following weighted average monomer VOC content limits, in weight percent: production resin atomized (spray) - 28%; production resin non-atomized - 35%; pigmented gel coat - 33%; clear gel coat - 48%; tooling resin atomized - 30%; tooling resin non-atomized - 39%; or tooling gel coat - 40%. [District Rule 4684] Federally Enforceable Through Title V Permit
- The non-monomer VOC content of each resin and gel coat shall not constitute more than 5 percent by weight of the resin or gel coat. [District Rule 4684] Federally Enforceable Through Title V Permit
- 10. The weighted average monomer VOC content for each open molding resin or gel coat material used at this facility shall be determined based on a 12-month rolling average using Equation 1 of District Rule 4684: Weighted Average Monomer VOC Content = [Summation of (Mi x VOCi)] / [Summation of Mi]; where Mi = Mass of open molding resin or gel coat 'i' used in the past 12 months in an operation, in megagrams; and VOCi = Monomer VOC content, by weight percent, of open molding resin or gel coat 'i' used in the past 12 months in an operation. [District Rule 4684] Federally Enforceable Through Title V Permit

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

Facility Name: SANGER BOATS, INC.

Location: 3316 E ANNADALE AVE,FRESNO, CA 93725 C-1074-2-5 : Aug 19 2021 10:07AM -- HONGM

- 11. Permittee shall ensure that all containers greater than 208 liters (55 gallons), including those used for on-site mixing of putties and polyputties, have a cover with no visible gaps in place at all times, except when material is being manually added or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container. [District Rule 4684] Federally Enforceable Through Title V Permit
- 12. The VOC content of organic solvents used in cleaning operations shall not exceed 25 g/l (0.21 lb/gal). [District Rule 4684] Federally Enforceable Through Title V Permit
- 13. Permittee shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in self-closing, non-absorbent and nonleaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the containers are empty. [District Rule 4684] Federally Enforceable Through Title V Permit
- 14. Permittee shall keep records of the daily and cumulative annual (calendar year) VOC emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
- 15. Permittee shall maintain records, on a monthly basis, of the facility's 12-month rolling period VOC emissions from all fiberglass boat manufacturing operations, including related solvent cleaning activities, before consideration of controls. [District Rule 2520] Federally Enforceable Through Title V Permit
- 16. Permittee shall maintain records, on a monthly basis, of the weighted average monomer VOC content for each open molding resin or gel coat material used at this facility, determined based on a 12-month rolling average, using Equation 1 of District Rule 4684. [District Rule 2520] Federally Enforceable Through Title V Permit
- 17. Permittee shall maintain the following records: 1) Daily records of the type and quantity of all resins, gel coats, fillers, catalysts, and cleaning materials (including cleaning solvents) used in each operation; 2) Records of the VOC content, in weight percent, of all polyester resin and gel coat, filler materials, including the weight percent of non-monomer VOC content of the resin and gel coat, used or stored at the facility; and 3) Records of the VOC content of all cleaning materials used and stored at the facility as specified in Section 5.3 of District Rule 4684. [District Rules 2520 and 4684] Federally Enforceable Through Title V Permit
- 18. Permittee shall retain all records on site for a period of five years, shall make the records available on site during normal business hours to the District, ARB, or EPA, and shall submit the records to the District, ARB, or EPA upon request. [District Rules 2520 and 4684] Federally Enforceable Through Title V Permit

**PERMIT UNIT:** C-1074-3-5 **EXPIRATION DATE:** 04/30/2021

#### **EQUIPMENT DESCRIPTION:**

POLYESTER RESIN AND FIBERGLASS APPLICATION OPERATION TO MOLDS CONSISTING OF HVLP. NON-ATOMIZING FLOW COATER APPLICATOR(S), A 12'W X 10'L X 8'H SPRAY BOOTH (BOOTH #2), 28 (20" X 20") FILTERS AND A 2 HP EXHAUST FAN

### PERMIT UNIT REQUIREMENTS

- All filters shall be properly maintained and must be in place during the resin operation. [District Rule 4102] 1.
- VOC emissions from this polyester resin and fiberglass application operation shall not exceed 25.8 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
- VOC emissions from resins used shall be calculated as follows: Resin Usage (gal/day) x Density of Resin (lb/gal) x 1 ton/2000 lb x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table (lb/ton). [District Rule 2201] Federally Enforceable Through Title V Permit
- Permittee shall calculate the fiberglass boat manufacturing facility emissions to demonstrate if the VOC emissions from all fiberglass boat manufacturing operations, including related solvent cleaning activities, at the facility are equal to or greater than 2.7 tons per 12-month rolling period, before consideration of controls. [District Rule 4684] Federally Enforceable Through Title V Permit
- Permittee shall not use materials in any open molding process that exceed the following weighted average monomer VOC content limits, in weight percent: production resin atomized (spray) - 28%; production resin non-atomized - 35%; pigmented gel coat - 33%; clear gel coat - 48%; tooling resin atomized - 30%; tooling resin non-atomized - 39%; or tooling gel coat - 40%. [District Rule 4684] Federally Enforceable Through Title V Permit
- The non-monomer VOC content of each resin and gel coat shall not constitute more than 5 percent by weight of the resin or gel coat. [District Rule 4684] Federally Enforceable Through Title V Permit
- The weighted average monomer VOC content for each open molding resin or gel coat material used at this facility shall be determined based on a 12-month rolling average using Equation 1 of District Rule 4684: Weighted Average Monomer VOC Content = [Summation of (Mi x VOCi)] / [Summation of Mi]; where Mi = Mass of open molding resin or gel coat 'i' used in the past 12 months in an operation, in megagrams; and VOCi = Monomer VOC content, by weight percent, of open molding resin or gel coat 'i' used in the past 12 months in an operation. [District Rule 4684] Federally Enforceable Through Title V Permit
- Permittee shall ensure that all containers greater than 208 liters (55 gallons), including those used for on-site mixing of putties and polyputties, have a cover with no visible gaps in place at all times, except when material is being manually added or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container. [District Rule 4684] Federally Enforceable Through Title V Permit
- The VOC content of organic solvents used in cleaning operations shall not exceed 25 g/l (0.21 lb/gal). [District Rule 4684] Federally Enforceable Through Title V Permit
- 10. Permittee shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in self-closing, non-absorbent and nonleaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the containers are empty. [District Rule 4684] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: SANGER BOATS, INC.

Location: 3316 E ANNADALE AVE,FRESNO, CA 93725 C-1074-3-5 : Aug 19 2021 10:07AM -- HONGM

- 11. Permittee shall keep records of the daily and cumulative annual (calendar year) VOC emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. Permittee shall maintain records, on a monthly basis, of the facility's 12-month rolling period VOC emissions from all fiberglass boat manufacturing operations, including related solvent cleaning activities, before consideration of controls. [District Rule 2520] Federally Enforceable Through Title V Permit
- 13. Permittee shall maintain records, on a monthly basis, of the weighted average monomer VOC content for each open molding resin or gel coat material used at this facility, determined based on a 12-month rolling average, using Equation 1 of District Rule 4684. [District Rule 2520] Federally Enforceable Through Title V Permit
- 14. Permittee shall maintain the following records: 1) Daily records of the type and quantity of all resins, gel coats, fillers, catalysts, and cleaning materials (including cleaning solvents) used in each operation; 2) Records of the VOC content, in weight percent, of all polyester resin and gel coat, filler materials, including the weight percent of non-monomer VOC content of the resin and gel coat, used or stored at the facility; and 3) Records of the VOC content of all cleaning materials used and stored at the facility as specified in Section 5.3 of District Rule 4684. [District Rules 2520 and 4684] Federally Enforceable Through Title V Permit
- 15. Permittee shall retain all records on site for a period of five years, shall make the records available on site during normal business hours to the District, ARB, or EPA, and shall submit the records to the District, ARB, or EPA upon request. [District Rules 2520 and 4684] Federally Enforceable Through Title V Permit

**PERMIT UNIT:** C-1074-4-5 **EXPIRATION DATE:** 04/30/2021

#### **EQUIPMENT DESCRIPTION:**

POLYESTER GEL COAT APPLICATION OPERATION TO MOLDS CONSISTING OF HVLP AND AIR-ASSISTED AIRLESS SPRAY GUNS, A 13'W X 15'L X 10'H SPRAY KING 200 SPRAY/TOOLING BOOTH (BOOTH #5), 18 (20" X 20") FILTERS AND A 2 HP EXHAUST FAN

## PERMIT UNIT REQUIREMENTS

- Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
- All filters shall be properly maintained and must be in place during the resin and gel coat operations. [District Rule 4102]
- VOC emissions from this resin and gel coat application operation shall not exceed 14.2 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
- VOC emissions from resins used shall be calculated as follows: Resin Usage (gal/day) x Density of Resin (lb/gal) x 1 ton/2000 lb x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table (lb/ton). [District Rule 2201] Federally Enforceable Through Title V Permit
- VOC emissions from gelcoats used shall be calculated as follows: Gelcoat Usage (gal/day) x Density of Gelcoat (lb/gal) x 1 ton/2000 lb x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table for styrene + Gelcoat Usage (gal/day) x Density of Gelcoat (lb/gal) x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table for MMA. [District Rule 2201] Federally Enforceable Through Title V Permit
- PM10 emissions from this resin and gel coat application operation shall not exceed 7.6 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
- PM10 emissions from gelcoats used shall be calculated as follows: Gelcoat Usage (gal/day) x Density of Gelcoat (lb/gal) x Solids Content (%, by weight) x 0.187. [District Rule 2201] Federally Enforceable Through Title V Permit
- Permittee shall calculate the fiberglass boat manufacturing facility emissions to demonstrate if the VOC emissions from all fiberglass boat manufacturing operations, including related solvent cleaning activities, at the facility are equal to or greater than 2.7 tons per 12-month rolling period, before consideration of controls. [District Rule 4684] Federally Enforceable Through Title V Permit
- Permittee shall not use materials in any open molding process that exceed the following weighted average monomer VOC content limits, in weight percent: production resin atomized (spray) - 28%; production resin non-atomized - 35%; pigmented gel coat - 33%; clear gel coat - 48%; tooling resin atomized - 30%; tooling resin non-atomized - 39%; or tooling gel coat - 40%. [District Rule 4684] Federally Enforceable Through Title V Permit
- 10. The non-monomer VOC content of each resin and gel coat shall not constitute more than 5 percent by weight of the resin or gel coat. [District Rule 4684] Federally Enforceable Through Title V Permit

Facility Name: SANGER BOATS, INC.

Location: 3316 E ANNADALE AVE,FRESNO, CA 93725 C-1074-4-5 : Aug 19 2021 10:07AM -- HONGM

- 11. The weighted average monomer VOC content for each open molding resin or gel coat material used at this facility shall be determined based on a 12-month rolling average using Equation 1 of District Rule 4684: Weighted Average Monomer VOC Content = [Summation of (Mi x VOCi)] / [Summation of Mi]; where Mi = Mass of open molding resin or gel coat 'i' used in the past 12 months in an operation, in megagrams; and VOCi = Monomer VOC content, by weight percent, of open molding resin or gel coat 'i' used in the past 12 months in an operation. [District Rule 4684] Federally Enforceable Through Title V Permit
- 12. Permittee shall ensure that all containers greater than 208 liters (55 gallons), including those used for on-site mixing of putties and polyputties, have a cover with no visible gaps in place at all times, except when material is being manually added or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container. [District Rule 4684] Federally Enforceable Through Title V Permit
- 13. The VOC content of organic solvents used in cleaning operations shall not exceed 25 g/l (0.21 lb/gal). [District Rule 4684] Federally Enforceable Through Title V Permit
- 14. Permittee shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in self-closing, non-absorbent and nonleaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the containers are empty. [District Rule 4684] Federally Enforceable Through Title V Permit
- 15. Permittee shall keep records of the daily and cumulative annual (calendar year) VOC emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
- 16. Permittee shall maintain records, on a monthly basis, of the facility's 12-month rolling period VOC emissions from all fiberglass boat manufacturing operations, including related solvent cleaning activities, before consideration of controls. [District Rule 2520] Federally Enforceable Through Title V Permit
- 17. Permittee shall maintain records, on a monthly basis, of the weighted average monomer VOC content for each open molding resin or gel coat material used at this facility, determined based on a 12-month rolling average, using Equation 1 of District Rule 4684. [District Rule 2520] Federally Enforceable Through Title V Permit
- 18. Permittee shall maintain the following records: 1) Daily records of the type and quantity of all resins, gel coats, fillers, catalysts, and cleaning materials (including cleaning solvents) used in each operation; 2) Records of the VOC content, in weight percent, of all polyester resin and gel coat, filler materials, including the weight percent of non-monomer VOC content of the resin and gel coat, used or stored at the facility; and 3) Records of the VOC content of all cleaning materials used and stored at the facility as specified in Section 5.3 of District Rule 4684. [District Rules 2520 and 4684] Federally Enforceable Through Title V Permit
- 19. Permittee shall retain all records on site for a period of five years, shall make the records available on site during normal business hours to the District, ARB, or EPA, and shall submit the records to the District, ARB, or EPA upon request. [District Rules 2520 and 4684] Federally Enforceable Through Title V Permit

**PERMIT UNIT:** C-1074-5-3 **EXPIRATION DATE:** 04/30/2021

#### **EQUIPMENT DESCRIPTION:**

WOOD AND FIBERGLASS TRIM GRINDING OPERATION CONSISTING OF A 12'W X 24'L X 9'H PARTS GRINDING BOOTH (BOOTH #3), 20 (20" X 20") FILTERS AND A 2 HP EXHAUST FAN

### PERMIT UNIT REQUIREMENTS

- All filters shall be properly maintained and must be in place during the grinding operation. [District Rule 4102]
- All equipment or systems installed or used to achieve compliance with the terms and conditions of this permit shall be maintained in good working order and be operated as efficiently as possible to minimize air pollution emissions. [District Rule 4102]
- Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

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

Facility Name: SANGER BOATS, INC.

Location: 3316 E ANNADALE AVE,FRESNO, CA 93725 C-1074-5-3 : Aug 19 2021 10:07AM - HONGM

**PERMIT UNIT:** C-1074-6-3 **EXPIRATION DATE:** 04/30/2021

#### **EQUIPMENT DESCRIPTION:**

WOOD AND FIBERGLASS TRIM GRINDING OPERATION CONSISTING OF A 14'W X 48'L X 10'H SPRAY KING 200 GRINDING BOOTH (BOOTH #4), 18 (20" X 20") FILTERS AND A 2 HP EXHAUST FAN

### PERMIT UNIT REQUIREMENTS

- All filters shall be properly maintained and must be in place during the grinding operation. [District Rule 4102]
- All equipment or systems installed or used to achieve compliance with the terms and conditions of this permit shall be maintained in good working order and be operated as efficiently as possible to minimize air pollution emissions. [District Rule 4102]
- Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

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

Facility Name: SANGER BOATS, INC.

Location: 3316 E ANNADALE AVE,FRESNO, CA 93725 C-1074-6-3 : Aug 19 2021 10:07AM - HONGM

**PERMIT UNIT:** C-1074-7-5 EXPIRATION DATE: 04/30/2021

#### **EQUIPMENT DESCRIPTION:**

POLYESTER GEL COAT APPLICATION OPERATION TO MOLDS AND PATTERNS CONSISTING OF HVLP AND AIR-ASSISTED AIRLESS SPRAY GUNS, A 14'W X 26'L X 9'H DEVILBISS SPRAY BOOTH (BOOTH #6), 12 (24" X 20") FILTERS AND A 2 HP EXHAUST FAN

## PERMIT UNIT REQUIREMENTS

- Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
- All filters shall be properly maintained and must be in place during the gel coat operation. [District Rule 4102] 2.
- 3. VOC emissions from this gel coat application operation shall not exceed 97.6 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
- VOC emissions from gelcoats used shall be calculated as follows: Gelcoat Usage (gal/day) x Density of Gelcoat (lb/gal) x 1 ton/2000 lb x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table for styrene + Gelcoat Usage (gal/day) x Density of Gelcoat (lb/gal) x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table for MMA. [District Rule 2201] Federally Enforceable Through Title V Permit
- PM10 emissions from this resin and gel coat application operation shall not exceed 79.4 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
- PM10 emissions from gelcoats used shall be calculated as follows: Gelcoat Usage (gal/day) x Density of Gelcoat (lb/gal) x Solids Content (%, by weight) x 0.187. [District Rule 2201] Federally Enforceable Through Title V Permit
- Permittee shall calculate the fiberglass boat manufacturing facility emissions to demonstrate if the VOC emissions from all fiberglass boat manufacturing operations, including related solvent cleaning activities, at the facility are equal to or greater than 2.7 tons per 12-month rolling period, before consideration of controls. [District Rule 4684] Federally Enforceable Through Title V Permit
- Permittee shall not use materials in any open molding process that exceed the following weighted average monomer VOC content limits, in weight percent: production resin atomized (spray) - 28%; production resin non-atomized - 35%; pigmented gel coat - 33%; clear gel coat - 48%; tooling resin atomized - 30%; tooling resin non-atomized - 39%; or tooling gel coat - 40%. [District Rule 4684] Federally Enforceable Through Title V Permit
- The non-monomer VOC content of each resin and gel coat shall not constitute more than 5 percent by weight of the resin or gel coat. [District Rule 4684] Federally Enforceable Through Title V Permit
- 10. The weighted average monomer VOC content for each open molding resin or gel coat material used at this facility shall be determined based on a 12-month rolling average using Equation 1 of District Rule 4684: Weighted Average Monomer VOC Content = [Summation of (Mi x VOCi)] / [Summation of Mi]; where Mi = Mass of open molding resin or gel coat 'i' used in the past 12 months in an operation, in megagrams; and VOCi = Monomer VOC content, by weight percent, of open molding resin or gel coat 'i' used in the past 12 months in an operation. [District Rule 4684] Federally Enforceable Through Title V Permit

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

Facility Name: SANGER BOATS, INC.

Location: 3316 E ANNADALE AVE,FRESNO, CA 93725 C-1074-7-5 : Aug 19 2021 10:08AM -- HONGM

- 11. Permittee shall ensure that all containers greater than 208 liters (55 gallons), including those used for on-site mixing of putties and polyputties, have a cover with no visible gaps in place at all times, except when material is being manually added or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container. [District Rule 4684] Federally Enforceable Through Title V Permit
- 12. The VOC content of organic solvents used in cleaning operations shall not exceed 25 g/l (0.21 lb/gal). [District Rule 4684] Federally Enforceable Through Title V Permit
- 13. Permittee shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in self-closing, non-absorbent and nonleaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the containers are empty. [District Rule 4684] Federally Enforceable Through Title V Permit
- 14. Permittee shall keep records of the daily and cumulative annual (calendar year) VOC emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
- 15. Permittee shall maintain records, on a monthly basis, of the facility's 12-month rolling period VOC emissions from all fiberglass boat manufacturing operations, including related solvent cleaning activities, before consideration of controls. [District Rule 2520] Federally Enforceable Through Title V Permit
- 16. Permittee shall maintain records, on a monthly basis, of the weighted average monomer VOC content for each open molding resin or gel coat material used at this facility, determined based on a 12-month rolling average, using Equation 1 of District Rule 4684. [District Rule 2520] Federally Enforceable Through Title V Permit
- 17. Permittee shall maintain the following records: 1) Daily records of the type and quantity of all resins, gel coats, fillers, catalysts, and cleaning materials (including cleaning solvents) used in each operation; 2) Records of the VOC content, in weight percent, of all polyester resin and gel coat, filler materials, including the weight percent of non-monomer VOC content of the resin and gel coat, used or stored at the facility; and 3) Records of the VOC content of all cleaning materials used and stored at the facility as specified in Section 5.3 of District Rule 4684. [District Rules 2520 and 4684] Federally Enforceable Through Title V Permit
- 18. Permittee shall retain all records on site for a period of five years, shall make the records available on site during normal business hours to the District, ARB, or EPA, and shall submit the records to the District, ARB, or EPA upon request. [District Rules 2520 and 4684] Federally Enforceable Through Title V Permit

**PERMIT UNIT:** C-1074-8-5 EXPIRATION DATE: 04/30/2021

#### **EQUIPMENT DESCRIPTION:**

POLYESTER GEL COAT APPLICATION OPERATION TO MOLDS AND PATTERNS CONSISTING OF HVLP AND AIR-ASSISTED AIRLESS SPRAY GUNS, A 14'W X 26'L X 9'H DEVILBISS SPRAY BOOTH (BOOTH #7), 12 (24" X 20") FILTERS AND A 2 HP EXHAUST FAN

## PERMIT UNIT REQUIREMENTS

- Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
- All filters shall be properly maintained and must be in place during the gel coat operation. [District Rule 4102] 2.
- 3. VOC emissions from this gel coat application operation shall not exceed 97.6 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
- VOC emissions from gelcoats used shall be calculated as follows: Gelcoat Usage (gal/day) x Density of Gelcoat (lb/gal) x 1 ton/2000 lb x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table for styrene + Gelcoat usage (gal/day) x Density of gelcoat (lb/gal) x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table for MMA. [District Rule 2201] Federally Enforceable Through Title V Permit
- PM10 emissions from this resin and gel coat application operation shall not exceed 79.4 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
- PM10 emissions from gelcoats used shall be calculated as follows: Gelcoat Usage (gal/day) x Density of Gel Coat (lb/gal) x Solids Content (%, by weight) x 0.187. [District Rule 2201] Federally Enforceable Through Title V Permit
- Permittee shall calculate the fiberglass boat manufacturing facility emissions to demonstrate if the VOC emissions from all fiberglass boat manufacturing operations, including related solvent cleaning activities, at the facility are equal to or greater than 2.7 tons per 12-month rolling period, before consideration of controls. [District Rule 4684] Federally Enforceable Through Title V Permit
- Permittee shall not use materials in any open molding process that exceed the following weighted average monomer VOC content limits, in weight percent: production resin atomized (spray) - 28%; production resin non-atomized - 35%; pigmented gel coat - 33%; clear gel coat - 48%; tooling resin atomized - 30%; tooling resin non-atomized - 39%; or tooling gel coat - 40%. [District Rule 4684] Federally Enforceable Through Title V Permit
- The non-monomer VOC content of each resin and gel coat shall not constitute more than 5 percent by weight of the resin or gel coat. [District Rule 4684] Federally Enforceable Through Title V Permit
- 10. The weighted average monomer VOC content for each open molding resin or gel coat material used at this facility shall be determined based on a 12-month rolling average using Equation 1 of District Rule 4684: Weighted Average Monomer VOC Content = [Summation of (Mi x VOCi)] / [Summation of Mi]; where Mi = Mass of open molding resin or gel coat 'i' used in the past 12 months in an operation, in megagrams; and VOCi = Monomer VOC content, by weight percent, of open molding resin or gel coat 'i' used in the past 12 months in an operation. [District Rule 4684] Federally Enforceable Through Title V Permit

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

Facility Name: SANGER BOATS, INC.

Location: 3316 E ANNADALE AVE,FRESNO, CA 93725 C-1074-8-5 : Aug 19 2021 10:08AM -- HONGM

- 11. Permittee shall ensure that all containers greater than 208 liters (55 gallons), including those used for on-site mixing of putties and polyputties, have a cover with no visible gaps in place at all times, except when material is being manually added or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container. [District Rule 4684] Federally Enforceable Through Title V Permit
- 12. The VOC content of organic solvents used in cleaning operations shall not exceed 25 g/l (0.21 lb/gal). [District Rule 4684] Federally Enforceable Through Title V Permit
- 13. Permittee shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in self-closing, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the containers are empty. [District Rule 4684] Federally Enforceable Through Title V Permit
- 14. Permittee shall keep records of the daily and cumulative annual (calendar year) VOC emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
- 15. Permittee shall maintain records, on a monthly basis, of the facility's 12-month rolling period VOC emissions from all fiberglass boat manufacturing operations, including related solvent cleaning activities, before consideration of controls. [District Rule 2520] Federally Enforceable Through Title V Permit
- 16. Permittee shall maintain records, on a monthly basis, of the weighted average monomer VOC content for each open molding resin or gel coat material used at this facility, determined based on a 12-month rolling average, using Equation 1 of District Rule 4684. [District Rule 2520] Federally Enforceable Through Title V Permit
- 17. Permittee shall maintain the following records: 1) Daily records of the type and quantity of all resins, gel coats, fillers, catalysts, and cleaning materials (including cleaning solvents) used in each operation; 2) Records of the VOC content, in weight percent, of all polyester resin and gel coat, filler materials, including the weight percent of non-monomer VOC content of the resin and gel coat, used or stored at the facility; and 3) Records of the VOC content of all cleaning materials used and stored at the facility as specified in Section 5.3 of District Rule 4684. [District Rules 2520 and 4684] Federally Enforceable Through Title V Permit
- 18. Permittee shall retain all records on site for a period of five years, shall make the records available on site during normal business hours to the District, ARB, or EPA, and shall submit the records to the District, ARB, or EPA upon request. [District Rules 2520 and 4684] Federally Enforceable Through Title V Permit

**PERMIT UNIT:** C-1074-9-5 **EXPIRATION DATE:** 04/30/2021

#### **EQUIPMENT DESCRIPTION:**

POLYESTER RESIN APPLICATION OPERATION TO WOOD COMPONENTS CONSISTING OF A 14'W X 26'L X 9'H DEVILBISS SPRAY BOOTH (BOOTH #8), 14 (20" X 20") FILTERS AND A 2 HP EXHAUST FAN

### PERMIT UNIT REQUIREMENTS

- All filters shall be properly maintained and must be in place during the resin operation. [District Rule 4102] 1.
- 2. VOC emissions from this polyester resin application operation shall not exceed 5.0 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
- VOC emissions from resins used shall be calculated as follows: Resin Usage (gal/day) x Density of Resin (lb/gal) x 1 ton/2000 lb x appropriate emissions factor from the Unified Emission Factors for Open Molding of Composites table (lb/ton). [District Rule 2201] Federally Enforceable Through Title V Permit
- Permittee shall calculate the fiberglass boat manufacturing facility emissions to demonstrate if the VOC emissions from all fiberglass boat manufacturing operations, including related solvent cleaning activities, at the facility are equal to or greater than 2.7 tons per 12-month rolling period, before consideration of controls. [District Rule 4684] Federally Enforceable Through Title V Permit
- Permittee shall not use materials in any open molding process that exceed the following weighted average monomer VOC content limits, in weight percent: production resin atomized (spray) - 28%; production resin non-atomized - 35%; pigmented gel coat - 33%; clear gel coat - 48%; tooling resin atomized - 30%; tooling resin non-atomized - 39%; or tooling gel coat - 40%. [District Rule 4684] Federally Enforceable Through Title V Permit
- The non-monomer VOC content of each resin and gel coat shall not constitute more than 5 percent by weight of the resin or gel coat. [District Rule 4684] Federally Enforceable Through Title V Permit
- The weighted average monomer VOC content for each open molding resin or gel coat material used at this facility shall be determined based on a 12-month rolling average using Equation 1 of District Rule 4684: Weighted Average Monomer VOC Content = [Summation of (Mi x VOCi)] / [Summation of Mi]; where Mi = Mass of open molding resin or gel coat 'i' used in the past 12 months in an operation, in megagrams; and VOCi = Monomer VOC content, by weight percent, of open molding resin or gel coat 'i' used in the past 12 months in an operation. [District Rule 4684] Federally Enforceable Through Title V Permit
- Permittee shall ensure that all containers greater than 208 liters (55 gallons), including those used for on-site mixing of putties and polyputties, have a cover with no visible gaps in place at all times, except when material is being manually added or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container. [District Rule 4684] Federally Enforceable Through Title V Permit
- The VOC content of organic solvents used in cleaning operations shall not exceed 25 g/l (0.21 lb/gal). [District Rule 4684] Federally Enforceable Through Title V Permit
- 10. Permittee shall store or dispose of all uncured polyester resin materials, fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in self-closing, non-absorbent and nonleaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the containers are empty. [District Rule 4684] Federally Enforceable Through Title V Permit

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

Facility Name: SANGER BOATS, INC.

Location: 3316 E ANNADALE AVE,FRESNO, CA 93725 C-1074-9-5 : Aug 19 2021 10:08AM -- HONGM

- 11. Permittee shall keep records of the daily and cumulative annual (calendar year) VOC emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. Permittee shall maintain records, on a monthly basis, of the facility's 12-month rolling period VOC emissions from all fiberglass boat manufacturing operations, including related solvent cleaning activities, before consideration of controls. [District Rule 2520] Federally Enforceable Through Title V Permit
- 13. Permittee shall maintain records, on a monthly basis, of the weighted average monomer VOC content for each open molding resin or gel coat material used at this facility, determined based on a 12-month rolling average, using Equation 1 of District Rule 4684. [District Rule 2520] Federally Enforceable Through Title V Permit
- 14. Permittee shall maintain the following records: 1) Daily records of the type and quantity of all resins, gel coats, fillers, catalysts, and cleaning materials (including cleaning solvents) used in each operation; 2) Records of the VOC content, in weight percent, of all polyester resin and gel coat, filler materials, including the weight percent of non-monomer VOC content of the resin and gel coat, used or stored at the facility; and 3) Records of the VOC content of all cleaning materials used and stored at the facility as specified in Section 5.3 of District Rule 4684. [District Rules 2520 and 4684] Federally Enforceable Through Title V Permit
- 15. Permittee shall retain all records on site for a period of five years, shall make the records available on site during normal business hours to the District, ARB, or EPA, and shall submit the records to the District, ARB, or EPA upon request. [District Rules 2520 and 4684] Federally Enforceable Through Title V Permit

**PERMIT UNIT:** C-1074-11-5 **EXPIRATION DATE:** 04/30/2021

### **EQUIPMENT DESCRIPTION:**

WOODWORKING OPERATION WITH ONE (1) RADIAL ARM SAW, ONE (1) TABLE SAW, SERVED BY A 1,200 CFM LMC 160-IRI-A AND ONE (1) ROUTER SERVED BY A 6,000 CFM DUST TECHNOLOGY MODEL DT-150 DUST COLLECTOR

### PERMIT UNIT REQUIREMENTS

- 1. PM10 emissions from the dust collectors shall not exceed 0.004 gr/dscf. [District Rules 2201 and 4201] Federally Enforceable Through Title V Permit
- 2. Visible emissions from any dust collectors shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
- 3. Visible emissions shall be inspected quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520] Federally Enforceable Through Title V Permit
- 4. Dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
- 5. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
- 6. The appropriate dust collector exhaust fan shall be switched on prior to the start-up of any woodworking equipment. [District Rule 2201] Federally Enforceable Through Title V Permit
- 7. All ducting and control equipment shall be in good working order to prevent fugitive particulate emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
- 8. All filters shall be properly maintained and must be in place during the woodworking operation(s). [District Rule 2201] Federally Enforceable Through Title V Permit
- 9. Each dust collector cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
- 10. At least one replacement filter for each dust collector shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
- 11. Material removed from dust collectors shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. All material that becomes deposited on the ground or any part of the dust collection system as a result of collection or material removal shall be cleaned up immediately. [District Rule 2201] Federally Enforceable Through Title V Permit
- 13. Records of dust collector maintenance, inspections, and repairs shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520] Federally Enforceable Through Title V Permit

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

Facility Name: SANGER BOATS, INC.

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

**EXPIRATION DATE:** 04/30/2021 **PERMIT UNIT:** C-1074-12-5

### **EQUIPMENT DESCRIPTION:**

ADHESIVE OPERATION WITH A 15 HP COMPRESSOR AND HIGH VOLUME LOW PRESSURE (HVLP) SPRAY **EQUIPMENT** 

### PERMIT UNIT REQUIREMENTS

- 1. VOC emissions from this adhesive application operation shall not exceed 2.0 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
- VOC emissions from adhesives used shall be calculated as follows: Adhesive Usage (gal/day) x VOC Content (lb/gal) x 0.25. [District Rule 2201] Federally Enforceable Through Title V Permit
- 3. PM10 emissions from the spray application of adhesive shall not exceed 3.7 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
- PM10 emissions from adhesives used shall be calculated as follows: Adhesive Usage (gal/day) x Density of Adhesive (lb/gal) x Solids Content (%, by weight) x 0.25. [District Rule 2201] Federally Enforceable Through Title V Permit
- The VOC content of adhesive products used for specific applications shall not exceed the following limits, expressed as grams of VOC per liter of adhesive product, excluding water and exempt compounds, or grams of VOC per liter of material for low-solids adhesive products, as applied, except where specified elsewhere on this permit: multipurpose construction, 70 g/l; ceramic tile adhesive, 65 g/l; cove base installation, 50 g/l; dry wall and/or panel adhesive, 50 g/l; floor covering installation, 150 g/l; ceramic floor tile installation, 65 g/l; indoor carpet adhesive, 50 g/l; carpet pad adhesive, 50 g/l; outdoor carpet adhesive, 150 g/l; rubber flooring adhesive, 60 g/l; perimeter bonded sheet flooring installation, 660 g/l; subfloor adhesive, 50 g/l; VCT and asphalt tile adhesive, 50 g/l; wood flooring adhesive, 100 g/l; single-ply roof material installation, 250 g/l; non-membrane roof adhesive, 300 g/l; structural glazing, 100 g/l; structural wood member adhesive, 140 g/l; contact adhesive, 80 g/l; specialty contact adhesive, 250 g/l; rubber vulcanization adhesive/primer, 850 g/l; tire retread adhesive, 100 g/l; motor vehicle adhesive, 250 g/l; motor vehicle weatherstrip adhesive, 750 g/l; traffic marking tape adhesive/primer, 150 g/l; top and trim adhesive, 540 g/l; waterproof resorcinol glue, 170 g/l; staple and nail manufacturing, 640 g/l; thin metal laminating adhesive, 780 g/l; elastomeric adhesive, 750 g/l; flexible vinyl adhesive, 250 g/l; ABS welding adhesive, 325 g/l; cellulosic plastic welding adhesive, 100 g/l; CPVC welding adhesive, 490 g/l; PVC welding adhesive, 510 g/l; styrene-acrylonitrile welding adhesive, 100 g/l; plastic cement welding adhesive primer, 400 g/l; other plastic cement welding adhesives, 250 g/l; automotive glass primer, 700 g/l; adhesive primer, 250 g/l. [District Rule 4653] Federally Enforceable Through Title V Permit
- The VOC content of adhesive products, except as provided elsewhere on this permit, shall not exceed the following limits, expressed as grams of VOC per liter of adhesive product, excluding water and exempt compounds, or grams of VOC per liter of material for low-solids adhesive products, as applied: metal to metal, 30 g/l; porous materials, 50 g/l; plastic foam, 50 g/l; wood, 30 g/l; pre-formed rubber products, 250 g/l; reinforced plastic composite, 200 g/l; fiberglass, 80 g/l; all other substrates, 250 g/l. The higher of the two limits applies to the bonding of two dissimilar substrates. [District Rule 4653] Federally Enforceable Through Title V Permit

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

Facility Name: SANGER BOATS, INC.

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- 7. The VOC content of sealant products used for specific applications shall not exceed the following limits, expressed as grams of VOC per liter of sealant product, excluding water and exempt compounds, or grams of VOC per liter of material for low-solids sealant products, as applied: architectural, 250 g/l; marine deck, 760 g/l; non-membrane roof, 300 g/l; roadway, 250 g/l; single-ply roof membrane, 450 g/l; other sealants, 420 g/l. [District Rule 4653] Federally Enforceable Through Title V Permit
- 8. The VOC content of sealant primers used for specific applications shall not exceed the following limits, expressed as grams of VOC per liter of sealant product, excluding water and exempt compounds, or grams of VOC per liter of material for low-solids sealant products, as applied: architectural non-porous, 250 g/l; architectural porous, 775 g/l; modified bituminous, 500 g/l; marine deck, 760 g/l; other sealant primers, 750 g/l. [District Rule 4653] Federally Enforceable Through Title V Permit
- 9. The permittee shall only use the following equipment to apply adhesives and sealants: electrostatic application; flow coater; roll coater; dip coater; hand application methods; airless spray; HVLP spray; any other application method that demonstrates, to the satisfaction of the APCO and EPA, a coating transfer efficiency equivalent to or greater than the efficiency achieved by HVLP spray; or air-atomized spray (only for the application of contact adhesives or specialty contact adhesives). [District Rule 4653] Federally Enforceable Through Title V Permit
- 10. High-Volume, Low-Pressure (HVLP) spray equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4653] Federally Enforceable Through Title V Permit
- 11. For HVLP spray guns manufactured prior to January 1, 1996, the end user shall demonstrate that the gun meets HVLP spray equipment standards. Satisfactory proof will be either in the form of manufacturer's published material or by a demonstration using a certified air pressure tip gauge, measuring the air atomizing pressure dynamically at the center of the air cap and at the air horns. [District Rule 4653] Federally Enforceable Through Title V Permit
- 12. The permittee shall store or dispose of adhesive products, sealant products, catalysts, thinners, fresh or spent solvents, and waste solvent materials such as cloth, paper, etc., 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 containers are empty. The containers used for disposal of adhesive materials, solvents, or any unused VOC-containing materials shall be self-closing. [District Rule 4653] Federally Enforceable Through Title V Permit
- 13. The permittee shall ensure that mixing containers for used VOC-containing adhesive products, sealant products, and process-related waste materials are kept closed at all times except when depositing or removing these materials. [District Rule 4653] Federally Enforceable Through Title V Permit
- 14. The permittee shall minimize spills of VOC-containing adhesive products, sealant products, and process-related waste materials. [District Rule 4653] Federally Enforceable Through Title V Permit
- 15. The permittee shall convey VOC-containing adhesive products, sealant products, and process-related waste materials from one location to another in closed containers or pipes. [District Rule 4653] Federally Enforceable Through Title V Permit
- 16. VOC content of organic solvents used in cleaning operations shall not exceed any of the following limits: general product cleaning during manufacturing process or surface preparation for adhesive applications: 25 g/l (0.21 lb/gal), surface preparation cleaning prior to rubber vulcanization: 850 g/l (7.1 lb/gal), repair and maintenance cleaning: 25 g/l (0.21 lb/gal), and cleaning of adhesive application equipment: 25 g/l (0.21 lb/gal). [District Rule 4653] Federally Enforceable Through Title V Permit
- 17. Cleaning activities that use solvents, including performing surface preparation cleaning prior to rubber vulcanization with a VOC content greater than 25 g/l (0.21 lb/gallon), shall be performed by one or more of the following methods: wipe cleaning; or application of solvent from hand-held spray containers from which solvents are dispensed without a propellant-induced force; or non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4653] 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.

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- 18. Solvent shall not be atomized into the open air. This provision shall not apply to the cleaning of nozzle tips of automated spray equipment systems, except for robotic systems, and cleaning with spray bottles or containers. [District Rule 4653] Federally Enforceable Through Title V Permit
- 19. Permittee shall not use VOC-containing materials to clean spray equipment used for the application of coatings, adhesives, or ink, unless an enclosed system or equipment that is proven to equally effective at controlling emissions is used for cleaning. If an enclosed system is used, it must totally enclose spray guns, cups, nozzles, bowls, and other parts during washing, rinsing and draining procedures, and it must be used according to the manufacturer's recommendations and must be closed when not in use. [District Rule 4653] Federally Enforceable Through Title V Permit
- 20. The permittee shall implement the following work practices when participating in organic solvent cleaning activities: 1) minimize spills of VOC-containing cleaning materials; 2) convey VOC-containing cleaning materials from one location to another in closed containers or pipes; and 3) minimize VOC emissions from cleaning of application, storage, mixing, and conveying equipment by ensuring that the equipment cleaning is performed without atomizing the cleaning solvent and all spent solvent is captured in closed containers. [District Rule 4653] Federally Enforceable Through Title V Permit
- 21. Permittee shall store or dispose of cleaning materials, fresh or spent solvents, and waste solvent materials such as cloth, paper, etc., 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 containers are empty. The containers used for disposal of adhesive materials, solvents, or any unused VOC containing materials shall be self-closing. [District Rule 4653] Federally Enforceable Through Title V Permit
- 22. Each container of adhesive product and sealant product subject to District Rule 4653 shall display the maximum VOC content of the adhesive product or sealant product as applied. The VOC content shall be displayed as grams of VOC per liter of adhesive product or sealant product, excluding water and exempt compounds, or grams of VOC per liter of material for low-solids adhesive products. Each container of solvent subject to District Rule 4653 shall display the maximum VOC content (in grams of VOC per liter of material) as applied. [District Rule 4653] Federally Enforceable Through Title V Permit
- 23. Each container of adhesive product or sealant product subject to District Rule 4653 shall display a statement of the manufacturer's recommendations regarding thinning, reducing, or mixing of the adhesive product with any other VOC containing material. Mixing recommendations shall specify a ratio which results in a compliant, as applied, adhesive product, or sealant product. [District Rule 4653] Federally Enforceable Through Title V Permit
- 24. Permittee shall keep records of the daily VOC and PM10 emissions and cumulative annual (calendar year) VOC emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
- 25. The permittee shall maintain records of the following: 1) the VOC content, in grams VOC per liter, of all adhesive materials used and stored at the stationary source; 2) the VOC content of all solvents used and stored at the stationary source; and 3) the VOC content, in grams VOC per liter, of all sealant materials used and stored at the stationary source. [District Rule 4653] Federally Enforceable Through Title V Permit
- 26. The permittee shall keep a copy of the manufacturer's product data sheet or material safety data sheet of the solvents used for cleaning activities, and shall maintain a current list of solvents that are being used for organic solvent cleaning activities. The list shall include the following information: a) the name of the solvent and its manufacturer's name; b) the VOC content of the solvent expressed in grams/liter or lb/gallon; c) When the solvent is a mixture of different materials that are blended by the operator, 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, as applied; d) the type of cleaning activity for each solvent that is being used in accordance with the applicable cleaning category specified in Rule 4653; and e) the quantity of solvents used for cleaning operations on a daily basis. [District Rule 4653] Federally Enforceable Through Title V Permit
- 27. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 1070, 2520, and 4653] Federally Enforceable Through Title V Permit

# ATTACHMENT C

**Detailed Summary List of Facility Permits** 

# Detailed Facility Report For Facility=1074

Sorted by Facility Name and Permit Number

7/19/21 8:08 am

SANGER BOATS, INC.			FAC #		C 1074		TYPE: <b>TitleV</b> EXPIRE ON: 04/30/2021
3316 E ANNADALE AVE FRESNO, CA 93725		STA1 TELE	TUS: EPHONE:	A 2094852842		TOXIC ID: <b>40206</b> AREA: 7 / INSP. DATE: 05/22	
PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
C-1074-1-6	45.0 HP FIBERGLASS-RESIN AP	3020-01 B	1	143.00	143.00	Α	POLYESTER RESIN AND FIBERGLASS APPLICATION OPERATION TO HULL MOLDS FOR THE MANUFACTURE OF BOATS CONSISTING OF HVLP, NON-ATOMIZING FLOW COATER APPLICATOR(S), FIVE 1.5 HP EXHAUST FANS, ONE 7.5 HP EXHAUST FAN AND TWO 15 HP COMPRESSORS
C-1074-2-5	2.0 HP SPRAY BOOTH #1	3020-01 A	1	107.00	107.00	Α	POLYESTER GEL COAT APPLICATION OPERATION TO MOLDS CONSISTING OF HVLP AND AIR-ASSISTED AIRLESS SPRAY GUNS, A 14'W X 26'L X 9'H DEVILBISS SPRAY BOOTH (BOOTH #1), 14 (20" X 20") FILTERS, AND A 2 HP EXHAUST FAN
C-1074-3-5	2.0 HP SPRAY BOOTH #2	3020-01 A	1	107.00	107.00	Α	POLYESTER RESIN AND FIBERGLASS APPLICATION OPERATION TO MOLDS CONSISTING OF HVLP, NON-ATOMIZING FLOW COATER APPLICATOR(S), A 12'W X 10'L X 8'H SPRAY BOOTH (BOOTH #2), 28 (20" X 20") FILTERS AND A 2 HP EXHAUST FAN
C-1074-4-5	2.0 HP SPRAY BOOTH #5	3020-01 A	1	107.00	107.00	A	POLYESTER GEL COAT APPLICATION OPERATION TO MOLDS CONSISTING OF HVLP AND AIR-ASSISTED AIRLESS SPRAY GUNS, A 13'W X 15'L X 10'H SPRAY KING 200 SPRAY/TOOLING BOOTH (BOOTH #5), 18 (20" X 20") FILTERS AND A 2 HP EXHAUST FAN
C-1074-5-3	2.0 HP PARTS GRINDING BOOTH #3	3020-01 A	1	107.00	107.00	Α	WOOD AND FIBERGLASS TRIM GRINDING OPERATION CONSISTING OF A 12'W X 24'L X 9'H PARTS GRINDING BOOTH (BOOTH #3), 20 (20" X 20") FILTERS AND A 2 HP EXHAUST FAN
C-1074-6-3	2.0 HP GRINDING BOOTH #4	3020-01 A	1	107.00	107.00	Α	WOOD AND FIBERGLASS TRIM GRINDING OPERATION CONSISTING OF A 14'W X 48'L X 10'H SPRAY KING 200 GRINDING BOOTH (BOOTH #4), 18 (20" X 20") FILTERS AND A 2 HP EXHAUST FAN
C-1074-7-5	2.0 HP SPRAY BOOTH #6	3020-01 A	1	107.00	107.00	A	POLYESTER GEL COAT APPLICATION OPERATION TO MOLDS AND PATTERNS CONSISTING OF HVLP AND AIR-ASSISTED AIRLESS SPRAY GUNS, A 14'W X 26'L X 9'H DEVILBISS SPRAY BOOTH (BOOTH #6), 12 (24" X 20") FILTERS AND A 2 HP EXHAUST FAN
C-1074-8-5	2.0 HP SPRAY BOOTH #7	3020-01 A	1	107.00	107.00	Α	POLYESTER GEL COAT APPLICATION OPERATION TO MOLDS AND PATTERNS CONSISTING OF HVLP AND AIR-ASSISTED AIRLESS SPRAY GUNS, A 14'W X 26'L X 9'H DEVILBISS SPRAY BOOTH (BOOTH #7), 12 (24" X 20") FILTERS AND A 2 HP EXHAUST FAN
C-1074-9-5	2.0 HP SPRAY BOOTH #8	3020-01 A	1	107.00	107.00	Α	POLYESTER RESIN APPLICATION OPERATION TO WOOD COMPONENTS CONSISTING OF A 14'W X 26'L X 9'H DEVILBISS SPRAY BOOTH (BOOTH #8), 14 (20" X 20") FILTERS AND A 2 HP EXHAUST FAN
C-1074-10-2	7 hp electric motors	3020-01 A	1	107.00	107.00	D	A METAL CUTTING OPERATION WITH A BRILLIANT, MODEL BDM51, CUTTING SAW SERVED BY AN AERCOLOGY/DONALDSON, MODEL DM- 1500 BAGHOUSE
C-1074-11-5	40 HP	3020-01 B	1	143.00	143.00	Α	WOODWORKING OPERATION WITH ONE (1) RADIAL ARM SAW, ONE (1) TABLE SAW, SERVED BY A 1,200 CFM LMC 160-IRI-A AND ONE (1) ROUTER SERVED BY A 6,000 CFM DUST TECHNOLOGY MODEL DT-150 DUST COLLECTOR

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7/19/21 8:08 am

Detailed Facility Report
For Facility=1074
Sorted by Facility Name and Permit Number

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FEE	FEE	PERMIT

PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	AMOUNT	TOTAL	STATUS	EQUIPMENT DESCRIPTION
C-1074-12-5	15 hp	3020-01 A	1	107.00	107.00	Α	ADHESIVE OPERATION WITH A 15 HP COMPRESSOR AND HIGH VOLUME LOW PRESSURE (HVLP) SPRAY EQUIPMENT

Number of Facilities Reported: 1