NOV 12 2010

Scott Moffet
Excel Storage Products LP
213 Kelly St
Lodi, CA 95240

Re: Notice of Preliminary Decision - Title V Permit Renewal
District Facility # N-1002
Project # N-1062811

Dear Mr. Moffet:

Enclosed for your review and comment is the District’s analysis of the application to renew the Federally Mandated Operating Permit for Excel Storage Products LP for its metal parts and products coating operation at 214 Kelly Street in Lodi, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 30-day comment period which begins on the date of publication of the public notice.

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

Sincerely,

[Signature]

David Warner
Director of Permit Services

Attachments
C: Vanesa Gonzalez, Permit Services Engineer

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

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www.valleyair.org www.healthyairliving.com
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Gerardo C. Rios, Chief
Permits Office (AIR-3)
U.S. EPA - Region IX
75 Hawthorne St.
San Francisco, CA 94105

Re: Notice of Preliminary Decision – Title V Permit Renewal
District Facility # N-1002
Project # N-1062811

Dear Mr. Rios:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Excel Storage Products LP for its metal parts and products coating operation at 214 Kelly Street in Lodi, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 45-day comment period which begins on the date of publication of the public notice.

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

Sincerely,

David Warner
Director of Permit Services

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NOV 1 & 2010

Mike Tollstrup, Chief
Project Assessment Branch
Air Resources Board
P O Box 2815
Sacramento, CA 95812-2815

Re: Notice of Preliminary Decision - Title V Permit Renewal
District Facility # N-1002
Project # N-1062811

Dear Mr. Tollstrup:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Excel Storage Products LP for its metal parts and products coating operation at 214 Kelly Street in Lodi, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 30-day comment period which begins on the date of publication of the public notice.

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

Sincerely,

David Warner
Director of Permit Services

Attachments
C: Vanesa Gonzalez, Permit Services Engineer

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www.valleyair.org www.healthyairliving.com
NOTICE OF PRELIMINARY DECISION
FOR THE PROPOSED RENEWAL OF
THE FEDERALLY MANDATED OPERATING PERMIT

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District solicits public comment on the proposed renewal of the Federally Mandated Operating Permit to Excel Storage Products LP for its metal parts and products coating operation at 214 Kelly Street in Lodi, California.

The District's analysis of the legal and factual basis for this proposed action, project #N-1062811, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and the District office at the address below. There are no emission changes associated with this proposed action. This will be the public's only opportunity to comment on the specific conditions of the proposed renewal of the Federally Mandated Operating permit. If requested by the public, the District will hold a public hearing regarding issuance of this renewed permit. For additional information, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900. Written comments on the proposed renewed permit must be submitted within 30 days of the publication date of this notice to DAVID WARNER, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 1990 E. GETTYSBURG AVE, FRESNO, CALIFORNIA 93726-0244.
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A. DRAFT RENEWED TITLE V OPERATING PERMIT
B. PREVIOUS TITLE V OPERATING PERMIT
C. DETAILED FACILITY LIST
D. TEMPLATE QUALIFICATIONS
E. CURRENT DISTRICT RULE SIP COMPARISON
I. PROPOSAL

Excel Storage Products LP was issued a Title V permit on December 12, 1997. As required by District Rule 2520, the applicant is requesting a permit renewal. The existing Title V permit has been reviewed and modified to reflect all applicable District and federal rules updated, removed, or added since the issuance of the initial Title V permit.

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

II. FACILITY LOCATION

Excel Storage Productions LP is located 214 Kelly Street in Lodi, CA.
III. EQUIPMENT LISTING

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

IV. GENERAL PERMIT TEMPLATE USAGE

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

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

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

V. SCOPE OF EPA AND PUBLIC REVIEW

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

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

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

Conditions 1 through 41 of the requirements for permit unit N-1002-0-2.

VI. FEDERALLY ENFORCEABLE REQUIREMENTS

Rules Updated

- District Rule 2020, Exemptions (amended March 21, 2002 ⇒ amended December 20, 2007)

• District Rule 4601, Architectural Coatings  
  (Amended October 31, 2001 ⇒ amended December 17, 2009)

• District Rule 4603, Surface Coating of Metal Parts and Products, Plastic Parts and Products, and Pleasure Crafts  
  (Amended December 20, 2001 ⇒ amended September 17, 2009)

• District Rule 8011, General Requirements  

• District Rule 8021, Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities  

• District Rule 8031, Bulk Materials  

• District Rule 8041, Carryout and Trackout  

• District Rule 8051, Open Areas  

• District Rule 8061, Paved and Unpaved Roads  

• District Rule 8071, Unpaved Vehicle/Equipment Traffic Areas  
  (adopted November 15, 2001 ⇒ amended September 16, 2004)

• 40 CFR Part 61 National Emission Standard for Asbestos

• 40 CFR Part 82 Stratospheric Ozone

Rules Removed

• 40 CFR 60 Subpart EE Standards of Performance for Surface Coating of Metal Furniture

This subpart applies to metal furniture surface coating operations in which organic coatings are applied, and whose construction, modification, or reconstruction commenced after November 28, 1980. Permit unit N-1002-1 is a metal furniture coating operation. The facility received a permit to operate for this unit on July 18, 1979. The facility has not modified or reconstructed this operation as defined in 40 CFR 60 Subpart A. Therefore, this unit is not subject
to 40 CFR 60 Subpart EE and this rule reference has been removed from permit unit N-1002-1.

Rules Added

District Rule 4309, Dryers, Dehydrators and Ovens (adopted December 15, 2005)

Rules Not Updated

- District Rule 1100, Equipment Breakdown (amended December 17, 1992)
- District Rule 1160, Emission Statements (adopted November 18, 1992)
- District Rule 2010, Permits Required (adopted December 17, 1992)
- District Rule 2031, Transfer of Permits (adopted December 17, 1992)
- District Rule 2040, Applications (adopted December 17, 1992)
- District Rule 2070, Standards for Granting Applications (adopted December 17, 1992)
- District Rule 2080, Conditional Approval (adopted December 17, 1992)
- District Rule 2520, Federally Mandated Operating Permits (amended June 21, 2001)
- District Rule 4101, Visible Emissions (amended February 17, 2005)
- 40 CFR Part 64, Compliance Assurance Monitoring Program

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

No applicable rules have been added.

B. Rules Not Updated

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

Condition 42 of permit unit -0-2 is based on District Rule 4102 and will therefore not be discussed any further.

VIII. PERMIT REQUIREMENTS

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

A. Requirements Addressed by Model General Permit Templates

Facility-Wide Requirements

The applicant is proposing to use a general permit template to address federally applicable facility-wide requirements. Section IV of template SJV-UM-0-2 includes a demonstration of compliance for all applicable requirements. Template conditions have been added to the facility wide requirements as condition numbers 1 through 41 to ensure compliance with these requirements.

B. Requirements Not Addressed by Model General Permit Templates

A. District Rule 2020 - *Exemptions*

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

B. District Rule 2201 - *New and Modified Stationary Source Review Rule*

District Rule 2201 has been amended since this facility's last renewed Title V permit was issued. This Title V permit renewal does not constitute a modification per section 3.26, defined as an action including at least one of the following items:
1) Any change in hours of operation, production rate, or method of operation of an existing emissions unit, which would necessitate a change in permit conditions.

2) Any structural change or addition to an existing emissions unit which would necessitate a change in permit conditions. Routine replacement shall not be considered to be a structural change.

3) An increase in emissions from an emissions unit caused by a modification of the Stationary Source when the emissions unit is not subject to a daily emissions limitation.

4) Addition of any new emissions unit which is subject to District permitting requirements.

5) A change in a permit term or condition proposed by an applicant to obtain an exemption from an applicable requirement to which the source would otherwise be subject.

Therefore, the updated requirements of this rule are not applicable at this time.

C. District Rule 2520 – Federally Mandated Operating Permit

This rule was recently amended to incorporate several administrative corrections, clarify rule language, and add procedures for implementing compliance schedules. The only amendments to this rule that will have an effect on current permit requirements are the corrections to Section 9 rule references, as described in the following table:

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Rule 2520, Section 6.4.4, "Other Changes Not Requiring Title V Permit Amendment," allowed the permittee to implement changes, including the addition of new emissions units, without triggering the permit modification or amendment requirements until the time of Title V permit renewal, provided the conditions described in Sections 6.4.4.1 through 6.4.4.2 were met.

No changes were implemented under Section 6.4.4, therefore no further action is required.

D. District Rule 4309 – Dryers, Dehydrators and Ovens

This rule applies to any dryer, dehydrator, or oven that is fired on gaseous fuel, liquid fuel, or is fired on gaseous and liquid fuel sequentially, and the total rated heat input for the unit is 5.0 million British thermal units per hour (5.0 MMBtu/hr) or greater. This Rule applied to permit unit N-1002-4-5. However, the facility has derated the oven on this unit to less than 5.0 MMBtu/hr and is currently not subject to this rule. Conditions 12 and 14 will ensure the unit remains exempt from this rule.

E. District Rule 4603 - Surface Coating of Metal Parts and Products, Plastic Parts and Products, and Pleasure Crafts

The SIP approved version of District Rule 4603 (10/16/08 version) was revised on September 17, 2009. The revision added VOC content requirements for plastic parts and products coating operations, automotive/transportation and business machine plastic parts and products coating operations, and pleasure craft coating operations. As shown in Attachment E current District rule 4603 (9/17/09) is as stringent as or more stringent than the SIP approved version of District Rule 4603 (10/16/08). The following discussion will show compliance with current District Rule 4603.

The purpose of this rule is to limit the emissions of volatile organic compounds (VOCs) from the coating of metal parts and products, large appliances parts or products, metal, furniture, plastic parts and products and pleasure crafts, and from the organic solvent cleaning and storage and disposal of solvents and waste solvent materials associated with such coating. This rule also specifies the administrative and recordkeeping requirements and the test methods for determining the VOC content, the VOC emissions, the VOC capture efficiency, the acid content, the metallic or iridescent quality of coatings, and the VOC emissions from spray gun cleaning systems.

Sections 5.1 and 5.2 contain the VOC limits for metal part or product coating, except for large appliance parts or products coating.
a. N-1002-1-3: METAL PARTS AND PRODUCTS COATING OPERATION WITH HVLP GUN(S), PAINT SPRAY BOOTH WITH EXHAUST FILTERS AND SPRAY GUN CLEANER

Conditions 4 through 6 of the permit requirements ensure compliance with these requirements.

b. N-1002-2-6: METAL PARTS & PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN(S), SPRAY PAINT BOOTH WITH EXHAUST FILTERS AND A 1.2 MMBTU/HR NATURAL GAS-FIRED CURING OVEN

Conditions 8 through 10 of the permit requirements ensure compliance with these requirements.

c. N-1002-3-5: OUTDOOR METAL PARTS AND PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN(S), AND SPRAY GUN CLEANER

Conditions 3 through 5 of the permit requirements ensure compliance with these requirements.

d. N-1002-4-5: CONVEYORIZED METAL PARTS AND PRODUCTS POWDER COATING LINE CONSISTING OF A GBD INDUSTRIES WASH/RINSE BOOTH WITH A PERMIT EXEMPT 1.9 MMBTU/HR NATURAL GAS INDIRECT-FIRED WATER HEATER, A GEMA MODEL DIAMOND POWDER COATING BOOTH WITH AUTOMATED ELECTROSTATIC APPLICATION EQUIPMENT AND DRY CARTRIDGE FILTERS, A 1.9 MMBTU/HR NATURAL GAS DIRECT-FIRED INFRA-RED DRYING OVEN, AND A 5.4 MMBTU/HR (DERATED TO 4.9 MMBTU/HR) GBD NATURAL GAS DIRECT-FIRED INFRA-RED CURING OVEN

Condition 9 of the permit requirements ensures compliance with these requirements.

Sections 5.3 through 5.9 do not apply to the coating operations at this facility.

Section 5.10 states that an owner or operator shall not use organic solvents for cleaning operations that have a VOC content that exceeds 25 g/l (0.21 lb/gal).

a. N-1002-1-3: METAL PARTS AND PRODUCTS COATING OPERATION WITH HVLP GUN(S), PAINT SPRAY BOOTH WITH EXHAUST FILTERS AND SPRAY GUN CLEANER

Condition 9 of the permit requirements ensures compliance with this requirement.
b. **N-1002-2-6: METAL PARTS & PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN(S), SPRAY PAINT BOOTH WITH EXHAUST FILTERS AND A 1.2 MMBTU/HR NATURAL GAS-FIRED CURING OVEN**

Condition 13 of the permit requirements ensures compliance with this requirement.

c. **N-1002-3-5: OUTDOOR METAL PARTS AND PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN(S), AND SPRAY GUN CLEANER**

Condition 8 of the permit requirements ensures compliance with this requirement.

d. **N-1002-4-5: CONVEYORIZED METAL PARTS AND PRODUCTS POWDER COATING LINE CONSISTING OF A GBD INDUSTRIES WASH/RINSE BOOTH WITH A PERMIT EXEMPT 1.9 MMBTU/HR NATURAL GAS INDIRECT-FIRED WATER HEATER, A GEMA MODEL DIAMOND POWDER COATING BOOTH WITH AUTOMATED ELECTROSTATIC APPLICATION EQUIPMENT AND DRY CARTRIDGE FILTERS, A 1.9 MMBTU/HR NATURAL GAS DIRECT-FIRED INFRA-RED DRYING OVEN, AND A 5.4 MMBTU/HR (DERATED TO 4.9 MMBTU/HR) GBD NATURAL GAS DIRECT-FIRED INFRA-RED CURING OVEN**

Condition 13 of the permit requirements ensures compliance with this requirement.

Section 5.11 requires that an owner or operator shall store or dispose of fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty.

a. **N-1002-1-3: METAL PARTS AND PRODUCTS COATING OPERATION WITH HVLP GUN(S), PAINT SPRAY BOOTH WITH EXHAUST FILTERS AND SPRAY GUN CLEANER**

Condition 10 of the permit requirements ensures compliance with these requirements.

b. **N-1002-2-6: METAL PARTS & PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN(S), SPRAY PAINT BOOTH WITH EXHAUST FILTERS AND A 1.2 MMBTU/HR NATURAL GAS-FIRED CURING OVEN**

Condition 14 of the permit requirements ensures compliance with these requirements.
c. N-1002-3-5: OUTDOOR METAL PARTS AND PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN(S), AND SPRAY GUN CLEANER

Condition 9 of the permit requirements ensures compliance with these requirements.

d. N-1002-4-5: CONVEYORIZED METAL PARTS AND PRODUCTS POWDER COATING LINE CONSISTING OF A GBD INDUSTRIES WASH/RINSE BOOTH WITH A PERMIT EXEMPT 1.9 MMBTU/HR NATURAL GAS INDIRECT-FIRED WATER HEATER, A GEMA MODEL DIAMOND POWDER COATING BOOTH WITH AUTOMATED ELECTROSTATIC APPLICATION EQUIPMENT AND DRY CARTRIDGE FILTERS, A 1.9 MMBTU/HR NATURAL GAS DIRECT-FIRED INFRA-RED DRYING OVEN, AND A 5.4 MMBTU/HR (DERATED TO 4.9 MMBTU/HR) GBD NATURAL GAS DIRECT-FIRED INFRA-RED CURING OVEN

Condition 17 of the permit requirements ensures compliance with these requirements.

Section 5.12 requires that an operator shall not use or operate any coating application equipment on any metal parts and products, large appliances parts and products, metal furniture, plastic parts and products, automotive/transportation and business machine plastic parts and products, and pleasure crafts subject to the provisions of this rule unless one of the following methods is used:

- Electrostatic application;
- Electrodeposition;
- High-Volume, Low-Pressure (HVLP) spray;
- Flow coating;
- Roll coating;
- Dip coating;
- Brush coating; or
- Continuous coating.

In addition section 5.12.3.1 requires that High-Volume, Low-Pressure (HVLP) spray equipment shall be operated in accordance with the manufacturer's recommendations. Section 5.12.3.2 requires that for HVLP spray guns manufactured prior to January 1, 1996, the end user shall demonstrate that the gun meets HVLP spray equipment standards.
a. N-1002-1-3: METAL PARTS AND PRODUCTS COATING OPERATION WITH HVLP GUN(S), PAINT SPRAY BOOTH WITH EXHAUST FILTERS AND SPRAY GUN CLEANER

Conditions 7 and 8 of the permit requirements ensure compliance with these requirements.

b. N-1002-2-6: METAL PARTS & PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN(S), SPRAY PAINT BOOTH WITH EXHAUST FILTERS AND A 1.2 MM BTU/HR NATURAL GAS-FIRED CURING OVEN

Conditions 11 and 12 of the permit requirements ensure compliance with these requirements.

c. N-1002-3-5: OUTDOOR METAL PARTS AND PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN(S), AND SPRAY GUN CLEANER

Conditions 6 and 7 of the permit requirements ensure compliance with these requirements.

d. N-1002-4-5: CONVEYORIZED METAL PARTS AND PRODUCTS POWDER COATING LINE CONSISTING OF A GBD INDUSTRIES WASH/RINSE BOOTHS WITH A PERMIT EXEMPT 1.9 MM BTU/HR NATURAL GAS INDIRECT-FIRED WATER HEATER, A GEMA MODEL DIAMOND POWDER COATING BOOTH WITH AUTOMATED ELECTROSTATIC APPLICATION EQUIPMENT AND DRY CARTRIDGE FILTERS, A 1.9 MM BTU/HR NATURAL GAS DIRECT-FIRED INFRA-RED DRYING OVEN, AND A 5.4 MM BTU/HR (DERATED TO 4.9 MM BTU/HR) GBD NATURAL GAS DIRECT-FIRED INFRA-RED CURING OVEN

Condition 11 of the permit requirements ensures compliance with these requirements.

Section 6.1 includes labeling requirements for coating VOC, thinning recommendations and solvent compliance statement requirements.

a. N-1002-1-3: METAL PARTS AND PRODUCTS COATING OPERATION WITH HVLP GUN(S), PAINT SPRAY BOOTH WITH EXHAUST FILTERS AND SPRAY GUN CLEANER

Condition 11 of the permit requirements ensures compliance with these requirements.
b. N-1002-2-6: METAL PARTS & PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN(S), SPRAY PAINT BOOTH WITH EXHAUST FILTERS AND A 1.2 MMBTU/HR NATURAL GAS-FIRED CURING OVEN

Condition 15 of the permit requirements ensures compliance with these requirements.

c. N-1002-3-5: OUTDOOR METAL PARTS AND PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN(S), AND SPRAY GUN CLEANER

Condition 10 of the permit requirements ensures compliance with these requirements.

d. N-1002-4-5: CONVEYORIZED METAL PARTS AND PRODUCTS POWDER COATING LINE CONSISTING OF A GBD INDUSTRIES WASH/RINSE BOOTH WITH A PERMIT EXEMPT 1.9 MMBTU/HR NATURAL GAS INDIRECT-FIRED WATER HEATER, A GEMA MODEL DIAMOND POWDER COATING BOOTH WITH AUTOMATED ELECTROSTATIC APPLICATION EQUIPMENT AND DRY CARTRIDGE FILTERS, A 1.9 MMBTU/HR NATURAL GAS DIRECT-FIRED INFRA-RED DRYING OVEN, AND A 5.4 MMBTU/HR (DERATED TO 4.9 MMBTU/HR) GBD NATURAL GAS DIRECT-FIRED INFRA-RED CURING OVEN

Condition 18 of the permit requirements ensures compliance with these requirements.

Section 6.2 contains the recordkeeping requirements for this Rule.

a. N-1002-1-3: METAL PARTS AND PRODUCTS COATING OPERATION WITH HVLP GUN(S), PAINT SPRAY BOOTH WITH EXHAUST FILTERS AND SPRAY GUN CLEANER

Conditions 13 through 15 of the permit requirements ensure compliance with these requirements.

b. N-1002-2-6: METAL PARTS & PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN(S), SPRAY PAINT BOOTH WITH EXHAUST FILTERS AND A 1.2 MMBTU/HR NATURAL GAS-FIRED CURING OVEN

Conditions 20 through 22 of the permit requirements ensure compliance with these requirements.
c. **N-1002-3-5: OUTDOOR METAL PARTS AND PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN(S), AND SPRAY GUN CLEANER**

   Conditions 12 through 14 of the permit requirements ensure compliance with these requirements.

d. **N-1002-4-5: CONVEYORIZED METAL PARTS AND PRODUCTS POWDER COATING LINE CONSISTING OF A GBD INDUSTRIES WASH/RINSE BOOTH WITH A PERMIT EXEMPT 1.9 MMBTU/HR NATURAL GAS INDIRECT-FIRED WATER HEATER, A GEMA MODEL DIAMOND POWDER COATING BOOTH WITH AUTOMATED ELECTROSTATIC APPLICATION EQUIPMENT AND DRY CARTRIDGE FILTERS, A 1.9 MMBTU/HR NATURAL GAS DIRECT-FIRED INFRA-RED DRYING OVEN, AND A 5.4 MMBTU/HR (DERATED TO 4.9 MMBTU/HR) GBD NATURAL GAS DIRECT-FIRED INFRA-RED CURING OVEN**

   Conditions 15 and 16 of the permit requirements ensures compliance with these requirements.

Section 6.3 contains test methods to determine compliance with the provisions of this rule.

a. **N-1002-1-3: METAL PARTS AND PRODUCTS COATING OPERATION WITH HVLP GUN(S), PAINT SPRAY BOOTH WITH EXHAUST FILTERS AND SPRAY GUN CLEANER**

   Condition 12 of the permit requirements ensures compliance with these requirements.

b. **N-1002-2-6: METAL PARTS & PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN(S), SPRAY PAINT BOOTH WITH EXHAUST FILTERS AND A 1.2 MMBTU/HR NATURAL GAS-FIRED CURING OVEN**

   Condition 16 of the permit requirements ensures compliance with these requirements.

c. **N-1002-3-5: OUTDOOR METAL PARTS AND PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN(S), AND SPRAY GUN CLEANER**

   Condition 11 of the permit requirements ensures compliance with these requirements.

d. **N-1002-4-5: CONVEYORIZED METAL PARTS AND PRODUCTS POWDER COATING LINE CONSISTING OF A GBD INDUSTRIES WASH/RINSE BOOTH WITH A PERMIT EXEMPT 1.9 MMBTU/HR NATURAL GAS INDIRECT-FIRED WATER HEATER, A GEMA MODEL**
DIAMOND POWDER COATING BOOTH WITH AUTOMATED ELECTROSTATIC APPLICATION EQUIPMENT AND DRY CARTRIDGE FILTERS, A 1.9 MMBTU/HR NATURAL GAS DIRECT-FIRED INFRA-RED DRYING OVEN, AND A 5.4 MMBTU/HR (DERATED TO 4.9 MMBTU/HR) GBD NATURAL GAS DIRECT-FIRED INFRA-RED CURING OVEN

Condition 19 of the permit requirements ensures compliance with these requirements.

F. 40 CFR Part 64 - CAM

Although 40 CFR Part 64 was not amended since the issuance of the initial Title V Permit, it is considered here since it was not evaluated in the initial Title V evaluation. 40 CFR Part 64 requires Compliance Assurance Monitoring (CAM) 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.

a. N-1002-1-3: METAL PARTS AND PRODUCTS COATING OPERATION WITH HVLP GUN(S), PAINT SPRAY BOOTH WITH EXHAUST FILTERS AND SPRAY GUN CLEANER

This permit unit does not contain any emissions limits. Therefore, CAM is not triggered by this unit.

b. N-1002-2-6: METAL PARTS & PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN(S), SPRAY PAINT BOOTH WITH EXHAUST FILTERS AND A 1.2 MMBTU/HR NATURAL GAS-FIRED CURING OVEN

This permit unit contains an emissions limit for VOC and PM10. This unit does not have an add on control for VOC therefore CAM is not triggered VOC. However, as shown below, the pre-control potential to emit is not greater than the major source threshold of 140,000 pounds PM10/year. Therefore, this permit unit is not subject to CAM.

Per STAAPP/ALAPCO Vol. 2 (5/30/91) dry exhaust filter removal efficiency (RE) is 66%. Per current PTO the maximum annual emissions for PM10 is 17,690 lb/year. The uncontrolled potential to emit is calculated as follows.
\[
PE = Emission Limit \div (1 - Removal Efficiency)
\]
\[
= 17,690 \text{ lb-PM}_{10}/\text{year} \div (1 - 0.66)
\]
\[
= 52,029 \text{ lb-PM}_{10}/\text{year}
\]

c. N-1002-3-5: OUTDOOR METAL PARTS AND PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN(S), AND SPRAY GUN CLEANER

This permit unit contains an emissions limit for VOC. However, the unit does not contain add on control. Therefore, CAM is not triggered by this unit.

d. N-1002-4-5: CONVEYORIZED METAL PARTS AND PRODUCTS POWDER COATING LINE CONSISTING OF A GBD INDUSTRIES WASH/RINSE BOOTH WITH A PERMIT EXEMPT 1.9 MMBTU/HR NATURAL GAS INDIRECT-FIRED WATER HEATER, A GEMA MODEL DIAMOND POWDER COATING BOOTH WITH AUTOMATED ELECTROSTATIC APPLICATION EQUIPMENT AND DRY CARTRIDGE FILTERS, A 1.9 MMBTU/HR NATURAL GAS DIRECT-FIRED INFRA-RED DRYING OVEN, AND A 5.4 MMBTU/HR (DERATED TO 4.9 MMBTU/HR) GBD NATURAL GAS DIRECT-FIRED INFRA-RED CURING OVEN

This permit unit contains emissions limit for NO\textsubscript{x}, SO\textsubscript{x}, PM\textsubscript{10}, CO and VOC. This unit does not have an add on control for NO\textsubscript{x}, SO\textsubscript{x}, CO , and VOC therefore CAM is not triggered NO\textsubscript{x}, SO\textsubscript{x}, CO, and VOC. However, as shown below, the pre-control potential to emit is not greater than the major source threshold of 140,000 lbs-PM\textsubscript{10}/year. Therefore, this permit unit is not subject to CAM.

Per STAAPPA/ALAPCO Vol. 2 (5/30/91) dry exhaust filter removal efficiency (RE) is 66%. Per current PTO the maximum daily throughput of powder is 3,000 lb/day and the emission factor for the coating operation is 0.0025 lb-PM\textsubscript{10}/lb-powder. The uncontrolled potential to emit is calculated as follows.

\[
PE = [\text{Emission Factor} \div (1 - \text{Removal Efficiency})] x \text{Daily Usage} x \frac{365 \text{ day}}{\text{year}}
\]
\[
= [0.0025 \text{ lb-PM}_{10}/\text{lb-Powder} \div (1 - 0.66)] x 3,000 \text{ lb-Powder/day} x \frac{365 \text{ day}}{\text{year}}
\]
\[
= 8,051 \text{ lb-PM}_{10}/\text{year}
\]

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

By using the model general permit template listed in Section IV of this evaluation, the applicant has requested that a permit shield be issued for requirements addressed in the template. The basis for each permit shield is discussed in the Permit Shield section of each template.

B. Requirements not Addressed by Model General Permit Templates

Excel Storage Products LP is not requesting any new permit shields within this Title V renewal project. In addition, Excel Storage Products LP is not requesting any changes to the existing permit shields already included in their Title V operating permit. Therefore, all of the existing permit shields will be maintained on the revised permit for this renewal project.

X. PERMIT CONDITIONS

See Attachment A - Renewed Title V Operating Permit.

XI. ATTACHMENTS

A. Draft Renewed Title V Operating Permit
B. Previous Title V Operating Permit
C. Detailed Facility List
D. Template Qualification Form
E. Current District Rule SIP Comparison
FACILITY-WIDE REQUIREMENTS

1. {4362} 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

2. {4363} 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

3. {4364} The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit

4. {4365} Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit

5. {4366} The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.9.1 and 9.13.1] Federally Enforceable Through Title V Permit

6. {4367} A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit

7. {4368} Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit

8. {4369} The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit

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.
9. {4370} The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

10. {4371} The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit

11. {4372} Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit

12. {4373} If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit

13. {4374} It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit

14. {4375} The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissue, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit

15. {4376} The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit

16. {4377} The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit

17. {4378} The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit

18. {4379} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit

19. {4380} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit

20. {4381} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit

21. {4382} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit
22. {4383} No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit

23. {4384} No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit

24. {4385} All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit

25. {4386} The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit

26. {4387} With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit

27. {4388} If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit

28. {4389} If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit

29. {4390} Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8021 and 8011] Federally Enforceable Through Title V Permit

30. {4391} Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8031 and 8011] Federally Enforceable Through Title V Permit

31. {4392} An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8041 and 8011] Federally Enforceable Through Title V Permit

32. {4393} Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8051 and 8011] Federally Enforceable Through Title V Permit

33. {4394} Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rule 8061 and 8011] Federally Enforceable Through Title V Permit
34. Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rule 8071 and Rule 8011] Federally Enforceable Through Title V Permit

35. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit

36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit

37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit

38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit

39. 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), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

40. 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 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

41. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin December 12 of every year. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

42. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-1002-1-3

EXPIRATION DATE: 05/31/2007

EQUIPMENT DESCRIPTION:
METAL PARTS AND PRODUCTS COATING OPERATION WITH HVLP GUN(S), PAINT SPRAY BOOTH WITH EXHAUST FILTERS AND SPRAY GUN CLEANER

PERMIT UNIT REQUIREMENTS

1. The particulate matter emissions from the stack of the paint spray booth shall not exceed 0.1 gr/scf. [District Rule 4201] Federally Enforceable Through Title V Permit

2. Exhaust fans shall be switched on prior to the start of paint spraying operations. [District Rule 4102]

3. All filters shall be properly maintained and must be in place during the painting operations. [District Rule 4102]

4. VOC content of the coatings as applied, excluding water and exempt compounds, shall not exceed any of the following, except as allowed elsewhere in this permit: baked coating 275 g/l (2.3 lb/gal), air-dried coating: 340 g/l (2.8 lb/gal), air-dried dip coating of steel joists with coating viscosity, as applied, of more than 45.6 centistokes at 78 °F or an average dry-film thickness of greater than 2.0 millimeters: 340 g/l (2.8 lb/gal), air-dried dip coating of steel joists with coating viscosity, as applied, of less than or equal to 45.6 centistokes at 78 °F or an average dry-film thickness of less than or equal to 2.0 millimeters: 400 g/l (3.32 lb/gal). [District Rule 4603, 5.1] Federally Enforceable Through Title V Permit

5. VOC content of baked specialty coatings as applied, excluding water and exempt compounds, shall not exceed any of the following: camouflage 360 g/l (3.0 lb/gal), extreme performance: 420 g/l (3.5 lb/gal) through 12/31/2010 and 360 g/l (3.0 lb/gal) on and after 1/1/2011, heat resistant: 360 g/l (3.0 lb/gal), extreme high gloss: 360 g/l (3.0 lb/gal), high performance architectural: 420 g/l (3.5 lb/gal), high temperature: 420 g/l (3.5 lb/gal), metallic topcoat: 360 g/l (3.0 lb/gal), pretreatment coating: 420 g/l (3.5 lb/gal), silicone release: 420 g/l (3.5 lb/gal), solar absorbent: 360 g/l (3.0 lb/gal), and solid film lubricant: 880 g/l (7.3 lb/gal). [District Rule 4603, 5.2] Federally Enforceable Through Title V Permit

6. VOC content of air-dried specialty coatings as applied, excluding water and exempt compounds, shall not exceed any of the following: camouflage 420 g/l (3.5 lb/gal), extreme performance: 420 g/l (3.5 lb/gal), heat resistant: 420 g/l (3.5 lb/gal), extreme high gloss: 420 g/l (3.5 lb/gal), high performance architectural: 420 g/l (3.5 lb/gal), high temperature: 420 g/l (3.5 lb/gal), metallic topcoat: 420 g/l (3.5 lb/gal), pretreatment coating: 420 g/l (3.5 lb/gal), silicone release: 420 g/l (3.5 lb/gal), solar absorbent: 420 g/l (3.5 lb/gal), and solid film lubricant: 880 g/l (7.3 lb/gal). [District Rule 4603, 5.2] Federally Enforceable Through Title V Permit

7. Only HVLP, electrostatic, electrodeposition, flow, roll, dip, brush or continuous coating application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4603, 5.12] Federally Enforceable Through Title V Permit

8. Permittee shall demonstrate that HVLP guns manufactured prior to 1/1/96 operate between 0.1 and 10 psig air atomizing pressure, by manufacturer's published technical material or by use of a certified air pressure tip gauge. [District Rule 4603, 5.12.3] Federally Enforceable Through Title V Permit

9. VOC content of solvents used for product cleaning during manufacturing process or surface preparation for coating application, repair and maintenance cleaning, and cleaning of coating application equipment shall not exceed 25 g/l (0.21 lb/gal). [District Rule 4603] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.
10. All fresh or spent coatings, adhesives, catalysts, thinners and solvents shall be stored in closed containers. Solvent laden cloth or paper shall be stored and disposed in closed non-absorbent containers. [District Rule 4603] Federally Enforceable Through Title V Permit

11. Each container or accompanying data sheet of any coating shall display the maximum VOC content of the coating, as applied, and after any thinning recommended by the manufacturer. The VOC content shall be displayed as grams of VOC per liter of coating (less water and exempt compounds). Each container or accompanying data sheet shall display a statement of the manufacturer's recommendation regarding thinning of the coating. [District Rule 4603, 6.1] Federally Enforceable Through Title V Permit

12. VOC content of any coating shall be determined through the use of either product formulation data or analyzed by EPA Method 24 on an annual basis. [District Rule 4603, 6.3] Federally Enforceable Through Title V Permit

13. The permittee shall maintain daily records of the following: quantity and type of coatings and solvents used, mix ratios by volume of components added to each coating applied, volume of coatings applied, VOC content of each coating as applied, and VOC content of each solvent. [District Rule 4603, 6.2] Federally Enforceable Through Title V Permit

14. Permittee shall keep the following records for solvent cleaning activities: manufacturers product data sheet or MSDS of solvents used, VOC content of solvents in g/l or lb/gal, and the quantity of cleanup solvents used. [District Rule 4603, 6.1] Federally Enforceable Through Title V Permit

15. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4603] Federally Enforceable Through Title V Permit
San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-1002-2-6
EXPIRATION DATE: 03/31/2007

EQUIPMENT DESCRIPTION:
METAL PARTS & PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN(S), SPRAY PAINT BOOTH WITH EXHAUST FILTERS AND A 1.2 MMBTU/HR NATURAL GAS-FIRED CURING OVEN

PERMIT UNIT REQUIREMENTS

1. The particulate matter emissions from the stack of the paint spray booth shall not exceed 0.1 g/scf. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Exhaust fans shall be switched on prior to the start of paint spraying operations. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The exhaust filters shall be properly maintained and shall be in place during the painting operation. [District Rule 4102] Federally Enforceable Through Title V Permit
4. The total VOC emissions rate shall not exceed 276.0 lb/day and 50,200 lb/year. A year for the purposes of this condition is any rolling 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The total PM10 emissions rate shall not exceed 97.1 lb/day and 17,690 lb/year. A year for the purposes of this condition is any rolling 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The VOC emission rate shall not exceed 15,912 lb during the first quarter, 16,089 lb during the second quarter, 16,266 lb during the third quarter, nor 16,266 lb during the fourth quarter. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Emissions from the natural gas-fired curing oven shall not exceed any of the following: 0.1 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.084 lb-CO/MMBtu, and 0.0055 lb-VOC/MMBtu [District Rule 2201] Federally Enforceable Through Title V Permit
8. VOC content the coatings as applied, excluding water and exempt compounds, shall not exceed any of the following, except as allowed elsewhere in this permit: baked coating 275 g/l (2.3 lb/gal), air-dried coating: 340 g/l (2.8 lb/gal), air-dried dip coating of steel joists with coating viscosity, as applied, of more than 45.6 centistokes at 78 °F or an average dry-film thickness of greater than 2.0 millimeters: 340 g/l (2.8 lb/gal), air-dried dip coating of steel joists with coating viscosity, as applied, of less than or equal to 45.6 centistokes at 78 °F or an average dry-film thickness of less than or equal to 2.0 millimeters: 400 g/l (3.32 lb/gal). [District Rule 4603, 5.1] Federally Enforceable Through Title V Permit
9. VOC content of baked specialty coatings as applied, excluding water and exempt compounds, shall not exceed any of the following: camouflage 360 g/l (3.0 lb/gal), extreme performance: 420 g/l (3.5 lb/gal) through 12/31/2010 and 360 g/l (3.0 lb/gal) on and after 1/1/2011, heat resistant: 360 g/l (3.0 lb/gal), extreme high gloss: 360 g/l (3.0 lb/gal), high performance architectural: 420 g/l (3.5 lb/gal), high temperature: 420 g/l (3.5 lb/gal), metallic topcoat: 360 g/l (3.0 lb/gal), pretreatment coating: 420 g/l (3.5 lb/gal), silicone release: 420 g/l (3.5 lb/gal), solar absorbent: 360 g/l (3.0 lb/gal), and solid film lubricant: 880 g/l (7.3 lb/gal). [District Rule 4603, 5.2] 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.
10. VOC content of air-dried specialty coatings as applied, excluding water and exempt compounds, shall not exceed any of the following: camouflage 420 g/l (3.5 lb/gal), extreme performance: 420 g/l (3.5 lb/gal), heat resistant: 420 g/l (3.5 lb/gal), extreme high gloss: 420 g/l (3.5 lb/gal), high performance architectural: 420 g/l (3.5 lb/gal), high temperature: 420 g/l (3.5 lb/gal), metallic topcoat: 420 g/l (3.5 lb/gal), pretreatment coating: 420 g/l (3.5 lb/gal), silicone release: 420 g/l (3.5 lb/gal), solar absorbent: 420 g/l (3.5 lb/gal), and solid film lubricant: 880 g/l (7.3 lb/gal). [District Rule 4603, 5.2] Federally Enforceable Through Title V Permit

11. Only HVLP, electrostatic, electrodeposition, flow, roll, dip, brush or continuous coating application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer’s recommendations. [District Rule 4603, 5.12] Federally Enforceable Through Title V Permit

12. Permittee shall demonstrate that HVLP guns manufactured prior to 1/1/96 operate between 0.1 and 10 psig air atomizing pressure, by manufacturer’s published technical material or by use of a certified air pressure tip gauge. [District Rule 4603, 5.12.3] Federally Enforceable Through Title V Permit

13. VOC content of solvents used for product cleaning during manufacturing process or surface preparation for coating application, repair and maintenance cleaning, and cleaning of coating application equipment shall not exceed 25 g/l (0.21 lb/gal). [District Rule 4603] Federally Enforceable Through Title V Permit

14. All fresh or spent coatings, adhesives, catalysts, thinners and solvents shall be stored in closed containers. Solvent laden cloth or paper shall be stored and disposed in closed non-absorbent containers. [District Rule 4603] Federally Enforceable Through Title V Permit

15. Each container or accompanying data sheet of any coating shall display the maximum VOC content of the coating, as applied, and after any thinning recommended by the manufacturer. The VOC content shall be displayed as grams of VOC per liter of coating (less water and exempt compounds). Each container or accompanying data sheet shall display a statement of the manufacturer’s recommendation regarding thinning of the coating. [District Rule 4603, 6.1] Federally Enforceable Through Title V Permit

16. VOC content of any coating shall be determined through the use of either product formulation data or analyzed by EPA Method 24 on an annual basis. [District Rule 4603, 6.3] Federally Enforceable Through Title V Permit

17. The permittee shall maintain a record of the daily VOC and PM10 emissions. [District Rule 2201] Federally Enforceable Through Title V Permit

18. The permittee shall maintain a record of the cumulative annual VOC and PM10 emissions. The record shall be updated at least once during each week that the equipment operates. An annual period, for the purposes of this condition, is any rolling 12-month period. [District Rule 2201]

19. The permittee shall maintain a record of the quarterly VOC emissions from this equipment. The record shall be updated at least once during each week that the equipment operates. [District Rule 2201] Federally Enforceable Through Title V Permit

20. The permittee shall maintain daily records of the following: quantity and type of coatings and solvents used, mix ratios by volume of components added to each coating applied, volume of coatings applied, VOC content of each coating as applied, and VOC content of each solvent. [District Rule 4603, 6.2] Federally Enforceable Through Title V Permit

21. Permittee shall keep the following records for solvent cleaning activities: manufacturers product data sheet or MSDS of solvents used, VOC content of solvents in g/l or lb/gal, and the quantity of cleanup solvents used. [District Rule 4603, 6.1] Federally Enforceable Through Title V Permit

22. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4603] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.
San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-1002-3-5

OUTDOOR METAL PARTS AND PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN(S), AND SPRAY GUN CLEANER.

PERMIT UNIT REQUIREMENTS

1. The VOC emission rate shall not exceed 43.9 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit

2. The VOC emissions from this unit shall not exceed 12,500 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

3. VOC content the coatings as applied, excluding water and exempt compounds, shall not exceed any of the following, except as allowed elsewhere in this permit: baked coating 275 g/l (2.3 lb/gal), air-dried coating: 340 g/l (2.8 lb/gal), air-dried dip coating of steel joists with coating viscosity, as applied, of more than 45.6 centistokes at 78 °F or an average dry-film thickness of greater than 2.0 millimeters: 340 g/l (2.8 lb/gal), air-dried dip coating of steel joists with coating viscosity, as applied, of less than or equal to 45.6 centistokes at 78 °F or an average dry-film thickness of less than or equal to 2.0 millimeters: 400 g/l (3.32 lb/gal). [District Rule 4603, 5.1] Federally Enforceable Through Title V Permit

4. VOC content of baked specialty coatings as applied, excluding water and exempt compounds, shall not exceed any of the following: camouflage 360 g/l (3.0 lb/gal), extreme performance: 420 g/l (3.5 lb/gal) through 12/31/2010 and 360 g/l (3.0 lb/gal) on and after 1/1/2011, heat resistant: 360 g/l (3.0 lb/gal), extreme high gloss: 360 g/l (3.0 lb/gal), high performance architectural: 420 g/l (3.5 lb/gal), high temperature: 420 g/l (3.5 lb/gal), metallic topcoat: 420 g/l (3.5 lb/gal), pretreatment coating: 420 g/l (3.5 lb/gal), silicone release: 420 g/l (3.5 lb/gal), solar absorbent: 360 g/l (3.0 lb/gal), and solid film lubricant: 880 g/l (7.3 lb/gal). [District Rule 4603, 5.2] Federally Enforceable Through Title V Permit

5. VOC content of air-dried specialty coatings as applied, excluding water and exempt compounds, shall not exceed any of the following: camouflage 420 g/l (3.5 lb/gal), extreme performance: 420 g/l (3.5 lb/gal), heat resistant: 420 g/l (3.5 lb/gal), extreme high gloss: 420 g/l (3.5 lb/gal), high performance architectural: 420 g/l (3.5 lb/gal), high temperature: 420 g/l (3.5 lb/gal), metallic topcoat: 420 g/l (3.5 lb/gal), pretreatment coating: 420 g/l (3.5 lb/gal), silicone release: 420 g/l (3.5 lb/gal), solar absorbent: 420 g/l (3.5 lb/gal), and solid film lubricant: 880 g/l (7.3 lb/gal). [District Rule 4603, 5.2] Federally Enforceable Through Title V Permit

6. Only HVLP, electrostatic, electrodeposition, flow, roll, dip, brush or continuous coating application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4603, 5.12] Federally Enforceable Through Title V Permit

7. Permittee shall demonstrate that HVLP guns manufactured prior to 1/1/96 operate between 0.1 and 10 psig air atomizing pressure, by manufacturer's published technical material or by use of a certified air pressure tip gauge. [District Rule 4603, 5.12.3] Federally Enforceable Through Title V Permit

8. VOC content of solvents used for product cleaning during manufacturing process or surface preparation for coating application, repair and maintenance cleaning, and cleaning of coating application equipment shall not exceed 25 g/l (0.21 lb/gal). [District Rule 4603] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.
9. All fresh or spent coatings, adhesives, catalysts, thinners and solvents shall be stored in closed containers. Solvent laden cloth or paper shall be stored and disposed in closed non-absorbent containers. [District Rule 4603] Federally Enforceable Through Title V Permit

10. Each container or accompanying data sheet of any coating shall display the maximum VOC content of the coating, as applied, and after any thinning recommended by the manufacturer. The VOC content shall be displayed as grams of VOC per liter of coating (less water and exempt compounds). Each container or accompanying data sheet shall display a statement of the manufacturer's recommendation regarding thinning of the coating. [District Rule 4603, 6.1] Federally Enforceable Through Title V Permit

11. VOC content of any coating shall be determined through the use of either product formulation data or analyzed by EPA Method 24 on an annual basis. [District Rule 4603, 6.3] Federally Enforceable Through Title V Permit

12. The permittee shall maintain daily records of the following: quantity and type of coatings and solvents used, mix ratios by volume of components added to each coating applied, volume of coatings applied, VOC content of each coating as applied, and VOC content of each solvent. [District Rule 4603, 6.2] Federally Enforceable Through Title V Permit

13. Permittee shall keep the following records for solvent cleaning activities: manufacturers product data sheet or MSDS of solvents used, VOC content of solvents in g/l or lb/gal, and the quantity of cleanup solvents used. [District Rule 4603, 6.1] Federally Enforceable Through Title V Permit

14. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4603] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.
San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: N-1002-4-5

EQUIPMENT DESCRIPTION:
CONVEYORIZED METAL PARTS AND PRODUCTS POWDER COATING LINE CONSISTING OF A GBD INDUSTRIES WASH/RINSE BOOTH WITH A PERMIT EXEMPT 1.9 MMBTU/HR NATURAL GAS INDIRECT-FIRED WATER HEATER, A GEMA MODEL DIAMOND POWDER COATING BOOTH WITH AUTOMATED ELECTROSTATIC APPLICATION EQUIPMENT AND DRY CARTRIDGE FILTERS, A 1.9 MMBTU/HR NATURAL GAS DIRECT-FIRED INFRA-RED DRYING OVEN, AND A 5.4 MMBTU/HR (DERATED TO 4.9 MMBTU/HR) GBD NATURAL GAS DIRECT-FIRED INFRA-RED CURING OVEN

PERMIT UNIT REQUIREMENTS

1. Visible emissions from the dust collector shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in anyone hour. [District Rule 2201]
2. Particulate matter emissions shall not exceed 0.1 grains/1000 cu ft in concentration. [District Rule 4201, 3.0] Federally Enforceable Through Title V Permit
3. All coating shall be conducted in the booth with dust collector in place and fan(s) operating. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The filter cleaning frequency shall be adjusted to optimize the control efficiency in accordance with the manufacturer's recommendations. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Filter cleaning and replacement shall be performed in a manner preventing material entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The drying and curing ovens shall be fired only on PUC-regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Powder coating throughput shall not exceed 3,000 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. PM10 emissions from this powder coating operation shall not exceed 0.0025 lb/lb of powder throughput. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Powder coating used in this operation shall not contain any VOC's. [District Rules 2201 and 4603] Federally Enforceable Through Title V Permit
10. The maximum heat input for the curing oven shall not exceed 4.9 MMBtu/hr. The maximum heat input shall be maintained by limiting the number of burners installed in the curing oven so that the heat input does not exceed 4.9 MMBtu/hr. [District Rule 4309] Federally Enforceable Through Title V Permit
11. Only electrostatic coating application equipment shall be used, and it shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4603] Federally Enforceable Through Title V Permit
12. Emissions from the natural gas-fired drying and curing ovens shall not exceed the following: 0.1 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.084 lb-CO/MMBtu, and 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
13. No solvents with VOC shall be used for clean-up or surface preparation. [District Rules 2201 and 4603] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.
14. The permittee shall maintain a record for the 5.4 MMBtu/hr curing oven that includes: the date that burners are installed or removed; the manufacturer, model number, and maximum heat input for each type of burner installed; the quantity of each type of burner installed; and of the combined heat input of the burners installed. [District Rule 4309]

15. The permittee shall maintain daily records of the quantity, type, and VOC content of powder coatings used. [District Rules 2201, 2520, 9.3.2, and 4603] Federally Enforceable Through Title V Permit

16. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 2201, 2520, 9.4.2, and 4603] Federally Enforceable Through Title V Permit

17. All fresh or spent coatings, adhesives, catalysts, thinners and solvents shall be stored in closed containers. Solvent laden cloth or paper shall be stored and disposed in closed non-absorbent containers. [District Rule 4603] Federally Enforceable Through Title V Permit

18. Each container or accompanying data sheet of any coating shall display the maximum VOC content of the coating, as applied, and after any thinning recommended by the manufacturer. The VOC content shall be displayed as grams of VOC per liter of coating (less water and exempt compounds). Each container or accompanying data sheet shall display a statement of the manufacturer's recommendation regarding thinning of the coating. [District Rule 4603, 6.1] Federally Enforceable Through Title V Permit

19. VOC content of any coating shall be determined through the use of either product formulation data or analyzed by EPA Method 24 on an annual basis. [District Rule 4603, 6.3] Federally Enforceable Through Title V Permit
ATTACHMENT B

Previous Title V Operating Permit
Permit to Operate

FACILITY: N-1002
EXPIRATION DATE: 05/31/2007

LEGAL OWNER OR OPERATOR: EXCEL STORAGE PRODUCTS LP
MAILING ADDRESS: 213 KELLY ST
LODI, CA 95240

FACILITY LOCATION: 214 KELLY ST
LODI, CA 95240

FACILITY DESCRIPTION: METAL PARTS AND PRODUCT COATING OPERATION

The Facility's Permit to Operate may include Facility-wide Requirements as well as requirements that apply to specific permit units.

This Permit to Operate remains valid through the permit expiration date listed above, subject to payment of annual permit fees and compliance with permit conditions and all applicable local, state, and federal regulations. This permit is valid only at the location specified above, and becomes void upon any transfer of ownership or location. Any modification of the equipment or operation, as defined in District Rule 2201, will require prior District approval. This permit shall be posted as prescribed in District Rule 2010.

Seyed Sadredin
Executive Director / APCO

David Warner
Director of Permit Services
FACILITY-WIDE REQUIREMENTS

1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rule 110 (Stanislaus)] Federally Enforceable Through Title V Permit

2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rule 110 (Stanislaus)] Federally Enforceable Through Title V Permit

3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit

4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (3/21/02). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit

5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.12.1] Federally Enforceable Through Title V Permit

6. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit

7. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit

8. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit

9. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
10. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit

11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit

12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit

13. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit

14. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit

15. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit

16. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit

17. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit

18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit

19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit

20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit

21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit

22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (11/15/01). 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
23. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in the Table of Standards of District Rule 4601 (10/31/01) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit

24. All VOC-containing materials for architectural coatings subject to Rule 4601 (10/31/01) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit

25. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (10/31/01). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit

26. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit

27. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit

28. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR 82, Subpart B. [40 CFR 82, Subpart B] Federally Enforceable Through Title V Permit

29. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8021 and 8011] Federally Enforceable Through Title V Permit

30. 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 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8031 and 8011] Federally Enforceable Through Title V Permit

31. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8041 and 8011] Federally Enforceable Through Title V Permit

32. Whenever open areas are disturbed or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8051 and 8011] Federally Enforceable Through Title V Permit

33. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8061 and 8011] Federally Enforceable Through Title V Permit

34. 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 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8071 and Rule 8011] Federally Enforceable Through Title V Permit

35. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit
36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit

37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit

38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit

39. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Stanislaus), Rule 110 (Stanislaus), and Rule 202 (Stanislaus). A permit shield is granted from these requirements. [District Rule 2520, 13.21] Federally Enforceable Through Title V Permit

40. 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); 401 (11/15/01); 4601, sections 5.1, 5.2, 5.3, 5.8 and 8.0 (10/31/01); 8021 (11/15/01); 8031 (11/15/01); 8041 (11/15/01); 8051 (11/15/01); 8061 (11/15/01); and 8071 (11/15/01). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

41. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin December 12 of every year. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

42. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
PERMIT UNIT REQUIREMENTS

1. The particulate matter emissions from the stack of the paint spray booth shall not exceed 0.1 gr/scf. [District Rule 4201] Federally Enforceable Through Title V Permit

2. Exhaust fans shall be switched on prior to the start of paint spraying operations. [District Rule 4102]

3. All filters shall be properly maintained and must be in place during the painting operations. [District Rule 4102]

4. VOC content of any coatings as applied, excluding water and exempt compounds, used for any metal parts or product shall not exceed any of the following limits, except as allowed elsewhere in this permit: baked coating 275 g/l (2.3 lb/gal), air-dried coating: 340 g/l (2.8 lb/gal), air-dried dip coating of steel joists with coating viscosity, as applied, of more than 45.6 centistokes at 78°F or an average dry-film thickness of greater than 2.0 millimeters: 340 g/l (2.8 lb/gal), air-dried dip coating of steel joists with coating viscosity, as applied, of less than or equal to 45.6 centistokes at 78°F or an average dry-film thickness of less than or equal to 2.0 millimeters: 400 g/l (3.32 lb/gal). [District Rule 4603, 5.1; 40 CFR 60 Subpart EE and 40 CFR Part 64] Federally Enforceable Through Title V Permit

5. VOC content of baked specialty coatings as applied, excluding water and exempt compounds, used for metal parts or product shall not exceed any of the following limits: camouflage 360 g/l (3.0 lb/gal), extreme performance: 420 g/l (3.5 lb/gal), heat resistant: 360 g/l (3.0 lb/gal), high gloss: 360 g/l (3.0 lb/gal), high performance architectural: 420 g/l (3.5 lb/gal), high temperature: 420 g/l (3.5 lb/gal), metallic topcoat: 360 g/l (3.0 lb/gal), pretreatment wash primer: 420 g/l (3.5 lb/gal), silicone release: 420 g/l (3.5 lb/gal), solar absorber: 360 g/l (3.0 lb/gal), and solid film lubricant: 880 g/l (7.3 lb/gal). [District Rule 4603, 5.2; 40 CFR 60 Subpart EE and 40 CFR Part 64] Federally Enforceable Through Title V Permit

6. VOC content of air-dried specialty coatings as applied, excluding water and exempt compounds, used for metal parts or product shall not exceed any of the following limits: camouflage 420 g/l (3.5 lb/gal), extreme performance: 420 g/l (3.5 lb/gal), heat resistant: 420 g/l (3.5 lb/gal), high gloss: 420 g/l (3.5 lb/gal), high performance architectural: 420 g/l (3.5 lb/gal), high temperature: 420 g/l (3.5 lb/gal), metallic topcoat: 420 g/l (3.5 lb/gal), pretreatment wash primer: 420 g/l (3.5 lb/gal), silicone release: 420 g/l (3.5 lb/gal), solar absorber: 420 g/l (3.5 lb/gal), and solid film lubricant: 880 g/l (7.3 lb/gal). [District Rule 4603, 5.2; 40 CFR 60 Subpart EE and 40 CFR Part 64] Federally Enforceable Through Title V Permit

7. Only HVLP, electrostatic, electrodeposition, flow, roll, dip, brush or continuous coating application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4603, 5.6 and 40 CFR Part 64] Federally Enforceable Through Title V Permit

8. Permittee shall demonstrate that HVLP guns manufactured prior to 1/1/96 operate between 0.1 and 10 psig air atomizing pressure, by manufacturer's published technical material or by use of a certified air pressure tip gauge. [District Rule 4603, 5.6.3] Federally Enforceable Through Title V Permit
9. Effective November, 15, 2003, cleaning activities that use solvents with a VOC content greater than 50 g/l (0.42 lb/gallon) shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; 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 4603, 5.5.6 and 5.5.7 and 40 CFR Part 64] Federally Enforceable Through Title V Permit

10. Permittee shall not use materials with a VOC content greater than 50 g/l (0.42 lb/gallon) for spray equipment clean-up unless an enclosed system or equipment proven to be equally effective is used for cleaning. [District Rule 4603, 5.5.6 and 5.5.9 and 40 CFR Part 64] Federally Enforceable Through Title V Permit

11. Until 11/14/03, VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 70 g/l (0.58 lb/gal), repair and maintenance cleaning (except, until June 30, 2005, cleaning of ultraviolet lamps used for the curing of ultraviolet coatings): 50 g/l (0.42 lb/gal), and cleaning of coating application equipment: 950 g/l (7.9 lb/gal) and solvent vapor pressure of 35 mm Hg at standard conditions. [District Rule 4603, 5.5.2 and 5.5.4 and 40 CFR Part 64] Federally Enforceable Through Title V Permit

12. Effective 11/15/03, VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal), repair and maintenance cleaning (except, until June 30, 2005, cleaning of ultraviolet lamps used for the curing of ultraviolet coatings): 50 g/l (0.42 lb/gal), and cleaning of coating application equipment: 550 g/l (4.6 lb/gal). [District Rule 4603, 5.5.3 and 5.5.4 and 40 CFR Part 64] Federally Enforceable Through Title V Permit

13. An owner or operator shall store or dispose of fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4603, 5.5.10] Federally Enforceable Through Title V Permit

14. Permittee shall maintain daily records of the following: quantity and type of coatings and solvents used, mix ratios of volume of components added to each coating, volume of coatings applied, VOC content of each coating as applied, and VOC content of each solvent. [District Rule 4603, 6.2; 40 CFR 60 Subpart EE and 40 CFR Part 64] Federally Enforceable Through Title V Permit

15. Permittee shall keep the following records for solvent cleaning activities: manufacturers product data sheet or MSDS of solvents used, VOC content of solvents in g/l or lb/gal, and the type of cleaning activity for which each solvent is used. [District Rule 4603, 6.1 and 40 CFR Part 64] Federally Enforceable Through Title V Permit

16. Each container or accompanying data sheet of any coating shall display the maximum VOC content of the coating, as applied, and after any thinning recommended by the manufacturer. The VOC content shall be displayed as grams of VOC per liter of coating (less water and exempt compounds). Each container or accompanying data sheet shall display a statement of the manufacturer's recommendation regarding thinning of the coating. [District Rule 4603, 6.1] Federally Enforceable Through Title V Permit

17. VOC content of any coating shall be determined through the use of either product formulation data or analyzed by EPA Method 24 on an annual basis. [District Rule 4603, 6.3; 40 CFR 60 Subpart EE] Federally Enforceable Through Title V Permit

18. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable District requirements: Rule 4102 (12/17/92); Rule 4201(12/17/92); Rule 4603 (12/20/01); and 40 CFR 60, Subpart EE. The requirements for District Rule 4603 are more stringent than 40 CFR Part 60, Subpart EE and satisfy all its requirements. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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

1. The particulate matter emissions from the stack of the paint spray booth shall not exceed 0.1 gr/scf. [District Rule 2201] Federally Enforceable Through Title V Permit

2. Exhaust fans shall be switched on prior to the start of paint spraying operations. [District Rule 2201] Federally Enforceable Through Title V Permit

3. The exhaust filters shall be properly maintained and shall be in place during the painting operation. [District Rule 4102] Federally Enforceable Through Title V Permit

4. The total VOC emissions rate shall not exceed 276.0 lb/day and 50,200 lb/year. A year for the purposes of this condition is any rolling 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit

5. The total PM10 emissions rate shall not exceed 97.1 lb/day and 17,690 lb/year. A year for the purposes of this condition is any rolling 12-month period. [District Rule 2201] Federally Enforceable Through Title V Permit

6. The VOC emission rate shall not exceed 15,912 lb during the first quarter, 16,089 lb during the second quarter, 16,266 lb during the third quarter, nor 16,266 lb during the fourth quarter. [District NSR Rule and 40 CFR Part 64] Federally Enforceable Through Title V Permit

7. Emissions from the natural gas-fired curing oven shall not exceed any of the following: 0.1 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.084 lb-CO/MMBtu, and 0.0055 lb-VOC/MMBtu [District Rule 2201] Federally Enforceable Through Title V Permit

8. VOC content the coatings as applied, excluding water and exempt compounds, shall not exceed any of the following, except as allowed elsewhere in this permit: baked coating 275 g/l (2.3 lb/gal), air-dried coating: 340 g/l (2.8 lb/gal), air-dried dip coating of steel joists with coating viscosity, as applied, of more than 45.6 centistokes at 78 °F or an average dry-film thickness of greater than 2.0 millimeters: 340 g/l (2.8 lb/gal), air-dried dip coating of steel joists with coating viscosity, as applied, of less than or equal to 45.6 centistokes at 78 °F or an average dry-film thickness of less than or equal to 2.0 millimeters: 400 g/l (3.32 lb/gal). [District Rule 4603, 5.1; 40 CFR 60 Subpart EE and 40 CFR Part 64] Federally Enforceable Through Title V Permit

9. VOC content of baked specialty coatings as applied, excluding water and exempt compounds, shall not exceed any of the following: camouflage 360 g/l (3.0 lb/gal), extreme performance: 420 g/l (3.5 lb/gal) through 12/31/2010 and 360 g/l (3.0 lb/gal) on and after 1/1/2011, heat resistant: 360 g/l (3.0 lb/gal), extreme high gloss: 360 g/l (3.0 lb/gal), high performance architectural: 420 g/l (3.5 lb/gal), high temperature: 420 g/l (3.5 lb/gal), metallic topcoat: 360 g/l (3.0 lb/gal), pretreatment coating: 420 g/l (3.5 lb/gal), silicone release: 420 g/l (3.5 lb/gal), solar absorbent: 360 g/l (3.0 lb/gal), and solid film lubricant: 880 g/l (7.3 lb/gal). [District Rule 4603, 5.2; 40 CFR 60 Subpart EE and 40 CFR Part 64] Federally Enforceable Through Title V Permit
10. VOC content of air-dried specialty coatings as applied, excluding water and exempt compounds, shall not exceed any of the following: camouflage 420 g/l (3.5 lb/gal), extreme performance: 420 g/l (3.5 lb/gal), heat resistant: 420 g/l (3.5 lb/gal), extreme high gloss: 420 g/l (3.5 lb/gal), high performance architectural: 420 g/l (3.5 lb/gal), high temperature: 420 g/l (3.5 lb/gal), metallic topcoat: 420 g/l (3.5 lb/gal), pretreatment coating: 420 g/l (3.5 lb/gal), silicone release: 420 g/l (3.5 lb/gal), solar absorbent: 420 g/l (3.5 lb/gal), and solid film lubricant: 880 g/l (7.3 lb/gal). [District Rule 4603, 5.2; 40 CFR 60 Subpart EE and 40 CFR Part 64] Federally Enforceable Through Title V Permit

11. Only HVLP, electrostatic, electrodeposition, flow, roll, dip, brush or continuous coating application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4603, 5.12 and 40 CFR Part 64] Federally Enforceable Through Title V Permit

12. Permittee shall demonstrate that HVLP guns manufactured prior to 1/1/96 operate between 0.1 and 10 psig air atomizing pressure, by manufacturer's published technical material or by use of a certified air pressure tip gauge. [District Rule 4603, 5.12.3] Federally Enforceable Through Title V Permit

13. VOC content of solvents used for product cleaning during manufacturing process or surface preparation for coating application, repair and maintenance cleaning, and cleaning of coating application equipment shall not exceed 25 g/l (0.21 lb/gal). [District Rule 4603] Federally Enforceable Through Title V Permit

14. All fresh or spent coatings, adhesives, catalysts, thinners and solvents shall be stored in closed containers. Solvent laden cloth or paper shall be stored and disposed in closed non-absorbent containers. [District Rule 4603] Federally Enforceable Through Title V Permit

15. Each container or accompanying data sheet of any coating shall display the maximum VOC content of the coating, as applied, and after any thinning recommended by the manufacturer. The VOC content shall be displayed as grams of VOC per liter of coating (less water and exempt compounds). Each container or accompanying data sheet shall display a statement of the manufacturer's recommendation regarding thinning of the coating. [District Rule 4603, 6.1] Federally Enforceable Through Title V Permit

16. VOC content of any coating shall be determined through the use of either product formulation data or analyzed by EPA Method 24 on an annual basis. [District Rule 4603, 6.3; 40 CFR 60 Subpart EE] Federally Enforceable Through Title V Permit

17. The permittee shall maintain a record of the daily VOC and PM10 emissions. [District Rule 2201] Federally Enforceable Through Title V Permit

18. The permittee shall maintain a record of the cumulative annual VOC and PM10 emissions. The record shall be updated updated at least once during each week that the equipment operates. An annual period, for the purposes of this condition, is any rolling 12-month period. [District Rule 2201]

19. The permittee shall maintain a record of the quarterly VOC emissions from this equipment. The record shall be updated at least once during each week that the equipment operates, [District Rule]

20. The permittee shall maintain daily records of the following: quantity and type of coatings and solvents used, mix ratios by volume of components added to each coating applied, volume of coatings applied, VOC content of each coating as applied, and VOC content of each solvent. [District Rule 4603, 6.2; 40 CFR 60 Subpart EE and 40 CFR Part 64] Federally Enforceable Through Title V Permit

21. Permittee shall keep the following records for solvent cleaning activities: manufacturers product data sheet or MSDS of solvents used, VOC content of solvents in g/l or lb/gal, and the quantity of cleanup solvents used. [District Rule 4603, 6.1 and 40 CFR Part 64] Federally Enforceable Through Title V Permit

22. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4603] Federally Enforceable Through Title V Permit

23. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable District requirements: Rule 4102 (12/17/92); Rule 4201(12/17/92); Rule 4603 (12/20/01); and 40 CFR 60, Subpart EE. The requirements for District Rule 4603 are more stringent than 40 CFR Part 60, Subpart EE and satisfy all its requirements. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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

1. VOC content of any coatings as applied, excluding water and exempt compounds, used for any metal parts or product shall not exceed any of the following limits, except as allowed elsewhere in this permit: baked coating 275 g/l (2.3 lb/gal), air-dried coating: 340 g/l (2.8 lb/gal), air-dried dip coating of steel joists with coating viscosity, as applied, of more than 45.6 centistokes at 78 °F or an average dry-film thickness of greater than 2.0 millimeters: 340 g/l (2.8 lb/gal), air-dried dip coating of steel joists with coating viscosity, as applied, of less than or equal to 45.6 centistokes at 78 °F or an average dry-film thickness of less than or equal to 2.0 millimeters: 400 g/l (3.32 lb/gal). [District Rule 4603, 5.1; 40 CFR 60 Subpart EE] Federally Enforceable Through Title V Permit

2. VOC content of baked specialty coatings as applied, excluding water and exempt compounds, used for metal parts or product shall not exceed any of the following limits: camouflage 360 g/l (3.0 lb/gal), extreme performance: 420 g/l (3.5 lb/gal), heat resistant: 360 g/l (3.0 lb/gal), high gloss: 360 g/l (3.0 lb/gal), high performance architectural: 420 g/l (3.5 lb/gal), high temperature: 420 g/l (3.5 lb/gal), metallic topcoat: 360 g/l (3.0 lb/gal), pretreatment wash primers: 420 g/l (3.5 lb/gal), silicone release: 420 g/l (3.5 lb/gal), solar absorbant: 360 g/l (3.0 lb/gal), and solid film lubricant: 880 g/l (7.3 lb/gal). [District Rule 4603, 5.2; 40 CFR 60 Subpart EE] Federally Enforceable Through Title V Permit

3. VOC content of air-dried specialty coatings as applied, excluding water and exempt compounds, used for metal parts or product shall not exceed any of the following limits: camouflage 420 g/l (3.5 lb/gal), extreme performance: 420 g/l (3.5 lb/gal), heat resistant: 420 g/l (3.5 lb/gal), high gloss: 420 g/l (3.5 lb/gal), high performance architectural: 420 g/l (3.5 lb/gal), high temperature: 420 g/l (3.5 lb/gal), metallic topcoat: 420 g/l (3.5 lb/gal), pretreatment wash primers: 420 g/l (3.5 lb/gal), silicone release: 420 g/l (3.5 lb/gal), solar absorbant: 420 g/l (3.5 lb/gal), and solid film lubricant: 880 g/l (7.3 lb/gal). [District Rule 4603, 5.2; 40 CFR 60 Subpart EE] Federally Enforceable Through Title V Permit

4. Only HVLP, electrostatic, electrodeposition, flow, roll, dip, brush or continuous coating application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4603, 5.9] Federally Enforceable Through Title V Permit

5. Permittee shall demonstrate that HVLP guns manufactured prior to 1/1/96 operate between 0.1 and 10 psig air atomizing pressure, by manufacturer's published technical material or by use of a certified air pressure tip gauge. [District Rule 4603, 5.9.3] Federally Enforceable Through Title V Permit

6. All solvent cleaning activities shall be performed using solvents with a VOC content of 25 g/l (0.21 lb/gallon) or less unless such cleaning operations are performed within the control of an APCO-approved emission control system that meets the requirements of District Rule 4603. [District Rule 4603, 5.7.2] Federally Enforceable Through Title V Permit

7. Permittee shall not use materials with a VOC content greater than 25 g/l (0.21 lb/gallon) for spray equipment clean-up unless such cleaning operations are performed within the control of an APCO-approved emission control system that meets the requirements of District Rule 4603. [District Rule 4603, 5.7.2] Federally Enforceable Through Title V Permit
8. An owner or operator shall store or dispose of fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4603, 5.6] Federally Enforceable Through Title V Permit

9. Permittee shall maintain daily records of the following: quantity and type of coatings and solvents used, mix ratios of volume of components added to each coating, volume of coatings applied, VOC content of each coating as applied, and VOC content of each solvent. [District Rule 4603, 6.2; 40 CFR 60 Subpart EE] Federally Enforceable Through Title V Permit

10. Permittee shall keep the following records for solvent cleaning activities: manufacturers product data sheet or MSDS of solvents used, VOC content of solvents in g/l or lb/gal, and the type of cleaning activity for which each solvent is used. [District Rule 4603, 6.1] Federally Enforceable Through Title V Permit

11. The permittee shall maintain a record of the cumulative annual quantity of VOCs emitted (in pounds per day) from operations under this permit. The cumulative total quantity of VOCs emitted shall be updated monthly. [District Rule 2201] Federally Enforceable Through Title V Permit

12. Each container or accompanying data sheet of any coating shall display the maximum VOC content of the coating, as applied, and after any thinning recommended by the manufacturer. The VOC content shall be displayed as grams of VOC per liter of coating (less water and exempt compounds). Each container or accompanying data sheet shall display a statement of the manufacturer's recommendation regarding thinning of the coating. [District Rule 4603, 6.1] Federally Enforceable Through Title V Permit

13. VOC content of any coating shall be determined through the use of either product formulation data or analyzed by EPA Method 24 on an annual basis. [District Rule 4603, 6.3; 40 CFR 60 Subpart EE] Federally Enforceable Through Title V Permit

14. The VOC emission rate shall not exceed 43.9 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit

15. The VOC emissions from this unit shall not exceed 12,500 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit

16. Compliance with permit conditions in the Operating Permit shall be deemed compliance with the following applicable District requirements: Rule 4102 (12/17/92); Rule 4201(12/17/92); Rule 4603 (12/20/01); and 40 CFR 60, Subpart EE. The requirements for District Rule 4603 are more stringent than 40 CFR Part 60, Subpart EE and satisfy all its requirements. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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

1. Visible emissions from the dust collector shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in anyone hour. [District Rule 2201]

2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.0] Federally Enforceable Through Title V Permit

3. All coating shall be conducted in the booth with dust collector in place and fan(s) operating. [District Rule 2201] Federally Enforceable Through Title V Permit

4. The filter cleaning frequency shall be adjusted to optimize the control efficiency in accordance with the manufacturer's recommendations. [District Rule 2201] Federally Enforceable Through Title V Permit

5. Filter cleaning and replacement shall be performed in a manner preventing material entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit

6. The drying and curing ovens shall be fired only on PUC-regulated natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit

7. Powder coating throughput shall not exceed 3,000 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit

8. PM10 emissions from this powder coating operation shall not exceed 0.0025 lb/lb of powder throughput. [District Rule 2201] Federally Enforceable Through Title V Permit

9. Powder coating used in this operation shall not contain any VOC's. [District Rules 2201 and 4603] Federally Enforceable Through Title V Permit

10. The maximum heat input for the curing oven shall not exceed 4.9 MMBtu/hr. The maximum heat input shall be maintained by limiting the number of burners installed in the curing oven so that the heat input does not exceed 4.9 MMBtu/hr. [District Rule 4309] Federally Enforceable Through Title V Permit

11. Only electrostatic coating application equipment shall be used, and it shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4603] Federally Enforceable Through Title V Permit

12. Emissions from the natural gas-fired drying and curing ovens shall not exceed the following: 0.1 lb-NOx/MMBtu, 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.084 lb-CO/MMBtu, and 0.0055 lb-VOC/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit

13. No solvents with VOC shall be used for clean-up or surface preparation. [District Rules 2201 and 4603] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.
14. The permittee shall maintain a record for the 5.4 MMBtu/hr curing oven that includes: the date that burners are installed or removed; the manufacturer, model number, and maximum heat input for each type of burner installed; the quantity of each type of burner installed; and of the combined heat input of the burners installed. [District Rule 4309]

15. The permittee shall maintain daily records of the quantity, type, and VOC content of powder coatings used. [District Rules 2201, 2520, 9.3.2, and 4603] Federally Enforceable Through Title V Permit

16. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 2201, 2520, 9.4.2, and 4603] Federally Enforceable Through Title V Permit
## Detailed Facility Report

**For Facility=1002**

Sorted by Facility Name and Permit Number

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### PERMIT NUMBER FEE DESCRIPTION FEE RULE QTY FEE AMOUNT FEE TOTAL PERMIT STATUS EQUIPMENT DESCRIPTION

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<td>N-1002-4-4</td>
<td>7.3 MMBtu/hr</td>
<td>3020-02 G</td>
<td>1</td>
<td>815.00</td>
<td>815.00</td>
<td>A</td>
<td>CONVEYORIZED METAL PARTS AND PRODUCTS POWDER COATING LINE CONSISTING OF A GBD INDUSTRIES WASH/RINSE BOOTH WITH A PERMIT EXEMPT 1.9 MMBTU/HR NATURAL GAS INDIRECT-FIRED WATER HEATER, A GEMA MODEL DIAMOND POWDER COATING BOOTH WITH AUTOMATED ELECTROSTATIC APPLICATION EQUIPMENT AND DRY CARTRIDGE FILTERS, A 1.9 MMBTU/HR NATURAL GAS DIRECT-FIRED INFRA-RED DRYING OVEN, AND A 5.4 MMBTU/HR (DERATED TO 4.9 MMBTU/HR) GBD NATURAL GAS DIRECT-FIRED INFRA-RED CURING OVEN.</td>
</tr>
</tbody>
</table>

Number of Facilities Reported: 1
ATTACHMENT D

Template Qualification Form
Title V General Permit Template Qualification Form
for
Facility-wide Umbrella General Permit Template

District facility ID # W - 1002

To use this template, remove this sheet and attach to application. The conditions outlined in this template will be placed on your Title V permit.

Any facility may use this facility-wide template as part of its Title V application.

Based on information and belief formed after reasonable inquiry: 1) the information on this form is true and correct and 2) the facility certifies compliance with this template's permit conditions.

Signature of Responsible Official

Date

Name of Responsible Official (Please Print)
ATTACHMENT E

Current District Rule SIP Comparison
<table>
<thead>
<tr>
<th>Requirement Category</th>
<th>SIP Version of Rule 4603 (10/16/08)</th>
<th>Non-SIP Version of Rule 4603 (9/17/09)</th>
<th>Conclusion</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.0 Applicability</td>
<td>The provisions of this rule shall apply to the surface coating of metal parts or products, large appliances parts or products, and metal furniture, and to the organic solvent cleaning, and the storage and disposal of all solvents and waste solvent materials associated with such coating.</td>
<td>The provisions of this rule shall apply to the surface coating of metal parts or products, large appliances parts or products, metal furniture, and plastic parts and products, automotive/transportation and business machine plastic parts and products, and pleasure crafts, and to the organic solvent cleaning, and the storage and disposal of all solvents and waste solvent materials associated with such coating.</td>
<td>Revised to add plastic parts and products, automotive/transportation and business machine plastic parts and products, and pleasure crafts. Therefore, non-SIP version of rule is as stringent as SIP version.</td>
</tr>
<tr>
<td>4.0 Exemptions</td>
<td>4.1 Except for large appliance parts and products, and metal furniture coating operations subject to Section 5.4.1, an operator at a given stationary source may use up to a total of 55 gallons of non-compliant coatings per rolling, consecutive 365-day period. All other provisions of the rule, including application methods and administrative requirements shall apply to the use of the non-compliant coatings. 4.1.1 A non-compliant coating is a coating with VOC content, as applied, in excess of the applicable VOC content limits in Sections 5.1, or 5.2. 4.1.2 The 55-gallon exemption limit is the total amount of non-compliant coatings, as applied, for all operations that would otherwise be subject to Section 5.1, or Section 5.2 VOC content limits. 4.1.3 The 55-gallon exemption limit does not apply to non-compliant coatings used in a coating operation with an APCO-approved VOC emission control system that meets the requirements of Section 5.5. 4.2 The requirements of this rule shall not apply to touch-up and repair. 4.3 Any source which is in full compliance with the provisions of this rule shall be exempt from otherwise applicable portions of Rule 4661 (Organic Solvents). 4.4 The requirements of this rule shall not apply to the application of coatings to aircraft, aerospace vehicles, marine vessels, can, coils, and magnetic wire. 4.5 Through December 31, 2008, the provisions of this rule shall not apply to an operation subject to the requirements of Rule 4602 (Motor Vehicle and Mobile Equipment Coating)</td>
<td>4.1 Except for large appliance parts and products, metal furniture, plastic parts and products, automotive/transportation and business machine plastic parts and products, and pleasure craft coating operations subject to Section 5.4.1, Section 5.5.1, Section 5.6.1, and Section 5.7.1, respectively, an operator at a given stationary source may use up to a total of 55 gallons of non-compliant coatings per rolling, consecutive 365-day period. All other provisions of the rule, including application methods and administrative requirements shall apply to the use of the non-compliant coatings. 4.1.1 A non-compliant coating is a coating with VOC content, as applied, in excess of the applicable VOC content limits in Sections 5.1, or 5.2. 4.1.2 The 55-gallon exemption limit is the total amount of non-compliant coatings, as applied, for all operations that would otherwise be subject to Section 5.1, or Section 5.2 VOC content limits. 4.1.3 The 55-gallon exemption limit does not apply to non-compliant coatings used in a coating operation with an APCO-approved VOC emission control system that meets the requirements of Section 5.5. 4.2 Effective until December 31, 2010, the requirements of this rule shall not apply to metal parts and products touch-up and repair coating operation. On and after January 1, 2011, touch and repair coating used on metal parts and products shall comply with the applicable VOC limit specified in Section 5.2 Table 1. 4.3 Any source which is in full compliance with the provisions of this rule shall be exempt from otherwise applicable portions of Rule 4661 (Organic Solvents).</td>
<td>Revised to add plastic parts and products, automotive/transportation and business machine plastic parts and products, and pleasure crafts. Therefore, non-SIP version of rule is as stringent as SIP version.</td>
</tr>
<tr>
<td>Requirement Category</td>
<td>SIP Version of Rule 4603 (10/16/08)</td>
<td>Non-SIP Version of Rule 4603 (9/17/09)</td>
<td>Conclusion</td>
</tr>
<tr>
<td>----------------------</td>
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</tr>
<tr>
<td>Operations)</td>
<td></td>
<td>apply to the application of coatings to aircraft, aerospace vehicles, marine vessels, can, coils, and magnetic wire.</td>
<td></td>
</tr>
<tr>
<td>4.6 On and after January 1, 2009, the provisions of this rule shall not apply to an operation subject to the requirements of Rule 4612 (Motor Vehicle and Mobile Equipment Operations Phase II).</td>
<td>4.5 The provisions of this rule shall not apply to an operation subject to the requirements of Rule 4602 (Motor Vehicle Assembly Coatings).</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4.7 The provisions of this rule shall not apply to polyester resin operations and the application of polyester resin materials to metal parts and products.</td>
<td>4.6 The provisions of this rule shall not apply to an operation subject to the requirements of Rule 4612 (Motor Vehicle and Mobile Equipment Operations Phase II).</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4.8 The provisions of this rule shall not apply to stripping of cured coatings, cured adhesives, and cured inks, except the stripping of such materials from spray application equipment.</td>
<td>4.7 The provisions of this rule shall not apply to polyester resin operations and the application of polyester resin materials to metal parts and products that are subject to Rule 4684 (Polyester Resin Operations).</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4.9 The VOC content limits of Table 3 shall not apply to the following applications:</td>
<td>4.8 For plastic parts and products coating operations (except for automotive/transportation and business machine plastic parts as specified in Section 4.10), the VOC limits of Section 5.5 Table 3 and the solvent cleaning requirements of Section 5.10 shall not apply to the types of coatings and coating operations specified in Sections 4.8.1 through 4.8.9, provided the operator complies with the work practice standards in Section 5.9 and coating application methods in Section 5.12 of this rule.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4.9.1 Cleaning of solar cells, laser hardware, scientific instruments, or high precision optics.</td>
<td>4.8.1 Touch-up and repair coatings.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4.9.2 Cleaning in laboratory tests and analyses, or bench scale or research and development projects.</td>
<td>4.8.2 Stencil coatings applied on clear or transparent substrates.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4.9.3 Cleaning of paper-based gaskets.</td>
<td>4.8.3 Clear or translucent coatings.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>4.9.4 Cleaning of clutch assemblies where rubber is bonded to metal by means of an adhesive.</td>
<td>4.8.4 Coatings applied at a paint manufacturing facility while conducting performance tests on coatings.</td>
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<td></td>
</tr>
<tr>
<td>4.9.10 The VOC content limit of Table 3, Category C, shall not apply to the cleaning of application equipment used to apply coatings on satellites or to the cleaning of application equipment used to apply radiation effect coatings.</td>
<td>4.8.5 Any individual coating category used in volumes less than 50 gallons in any one calendar year, if substitute compliance coatings are not available, and the total usage of all such coatings does not exceed 200 gallons per calendar year, per stationary source.</td>
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<tr>
<td>4.9.6 Reflective coatings used on highway cones.</td>
<td>4.8.6 Electro-Magnetic Interference (EMI)/Radio Frequency Interference (RFI) shielding coatings.</td>
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</tr>
<tr>
<td>4.9.7 Mask coatings that are less than 0.5 millimeter thick (dried) and the area coated is less than 25 square inches.</td>
<td>4.8.7 Heparin-bezalkonium chloride (HBAC)-containing coatings applied</td>
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<td></td>
</tr>
<tr>
<td>Requirement Category</td>
<td>SIP Version of Rule 4603 (10/16/08)</td>
<td>Non-SIP Version of Rule 4603 (9/17/09)</td>
<td>Conclusion</td>
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<tr>
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<tr>
<td></td>
<td></td>
<td>to medical devices, provided that the total usage of all such coatings does not exceed 100 gallons per calendar year, per stationary source.</td>
<td></td>
</tr>
<tr>
<td>4.9 For plastic parts and products coating operations (except for automotive/transportation and business machine plastic parts as specified in Section 4.10), the coating application methods in Section 5.12 shall not apply to airbrush operations using five (5) gallons or less of coating per calendar year, provided the operator complies with the applicable VOC limits in Table 3, work practice standards in Section 5.9 and applicable recordkeeping requirement of Section 6.2.</td>
<td></td>
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<tr>
<td>4.10 For automotive/transportation and business machine plastic parts and products coating operations, the VOC limits of Section 5.6 Table 4 and the solvent cleaning requirements of Section 5.10 shall not apply to the types of coatings and coating operations specified in Sections 4.10.1 through 4.10.8, provided the operator complies with the work practice standards in Section 5.9 and coating application methods in Section 5.12 of this rule.</td>
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<tr>
<td>4.10.1 Texture Coatings.</td>
<td></td>
<td>4.10.2 Texture Topcoats.</td>
<td></td>
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<tr>
<td>4.10.3 Gloss Reducers.</td>
<td></td>
<td>4.10.4 Vacuum Metalizing Coatings.</td>
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<tr>
<td>4.10.5 Adhesion Primers.</td>
<td></td>
<td>4.10.6 Electrostatic Preparation Coatings.</td>
<td></td>
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<tr>
<td>4.10.7 Resist Coatings.</td>
<td></td>
<td>4.10.8 Stencil Coatings.</td>
<td></td>
</tr>
<tr>
<td>4.11 For pleasure craft surface coating operations, the application method in Section 5.12 shall not apply to extreme gloss coating provided the operator complies with the extreme gloss coating VOC limit in Table 5 and the work practice standards in Section 5.9 of this rule.</td>
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</tr>
<tr>
<td>4.12 The provisions of this rule shall not apply to stripping of cured coatings, cured adhesives, and cured inks, except the stripping of such materials from spray application equipment.</td>
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</tr>
<tr>
<td>4.13 The VOC content limits of Table 6 shall not apply to the following applications:</td>
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<td></td>
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</tr>
<tr>
<td>4.13.1 Cleaning of solar cells, laser hardware, scientific instruments, or high precision optics.</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
| 4.13.2 Cleaning in laboratory tests and analyses, or bench scale or
<table>
<thead>
<tr>
<th>Requirement Category</th>
<th>SIP Version of Rule 4603 (10/16/08)</th>
<th>Non-SIP Version of Rule 4603 (9/17/09)</th>
<th>Conclusion</th>
</tr>
</thead>
<tbody>
<tr>
<td>5.0 Requirements</td>
<td>5.1 General Coating Limits for Metal Parts and Products, Except for Large Appliance Parts or Products, and Metal Furniture Subject to Section 5.4.1 Except as otherwise provided by this rule, no operator shall apply to any metal part or product any coating with a VOC content in excess of the following limits, expressed as grams of VOC per liter (or pounds per gallon) of coating, less water and exempt compounds, as applied.</td>
<td>5.1 General Coating Limits for Metal Parts and Products, Except for Large Appliance Parts or Products, and Metal Furniture Subject to Section 5.4.1 Except as otherwise provided by this rule, no operator shall apply to any metal part or product any coating with a VOC content in excess of the following limits, expressed as grams of VOC per liter (or pounds per gallon) of coating, less water and exempt compounds, as applied.</td>
<td>No change to requirements from SIP approved version. Therefore, non-SIP version of rule is as stringent as SIP version.</td>
</tr>
<tr>
<td></td>
<td>5.1.1 Baked Coating 275 grams/liter (2.3 pounds/gallon)</td>
<td>5.1.1 Baked Coating : 275 grams/liter (2.3 pounds/gallon)</td>
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<tr>
<td></td>
<td>5.1.2 Air-Dried Coating 340 grams/liter (2.8 pounds/gallon)</td>
<td>5.1.2 Air-Dried Coating: 340 grams/liter (2.8 pounds/gallon)</td>
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<tr>
<td></td>
<td>5.1.3 VOC Content Limit for Dip coating of steel joists (SIC 3441), airdried.</td>
<td>5.1.3 VOC Content Limit for Dip coating of steel joists (SIC 3441), airdried.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>5.1.3.1 340 grams of VOC/liter (2.8 pounds of VOC/gallon) for coatings with a viscosity, as applied, of more than 45.6 centistokes at 78°F or an average dry-film thickness of greater than 2.0 mils;</td>
<td>5.1.3.1 340 grams of VOC/liter (2.8 pounds of VOC/gallon) for coatings with a viscosity, as applied, of more than 45.6 centistokes at 78°F or an average dry-film thickness of greater than 2.0 mils;</td>
<td></td>
</tr>
<tr>
<td></td>
<td>5.1.3.2 400 grams of VOC/liter (3.32 pounds of VOC/gallon) for coatings with a viscosity, as applied, of less than or equal to 45.6 centistokes at 78°F and an average dry-film thickness of less than or equal to 2.0 mils.</td>
<td>5.1.3.2 400 grams of VOC/liter (3.32 pounds of VOC/gallon) for coatings with a viscosity, as applied, of less than or equal to 45.6 centistokes at 78°F and an average dry-film thickness of less than or equal to 2.0 mils.</td>
<td></td>
</tr>
<tr>
<td>5.2 Specialty Coating for Metal Parts and Products, Except for Large Appliance Parts or Products, and Metal Furniture Subject to Sections 5.4.1 An operator subject to Section 5.2 shall not apply to any metal part or product any specialty coating with a VOC content in excess of the limits in Table 1.</td>
<td>5.2 Specialty Coating for Metal Parts and Products, Except for Large Appliance Parts or Products, and Metal Furniture Subject to Section 5.4.1 An operator subject to Section 5.2 shall not apply to any metal part or product any specialty coating with a VOC content in excess of the limits in Table 1.</td>
<td>The non-SIP approved version includes a more stringent VOC content for baked Extreme Performance coatings effective 1/1/11 and added a new coating type. Therefore, non-SIP version of rule is as stringent as SIP version.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Table 1 – VOC Content Limits for Specialty Coatings, except for Large Appliance Parts or Products, and Metal Furniture subject to Section 5.4.1 Limits are expressed as grams of VOC/liter (or pounds of VOC/gallon) of coating, less water and less exempt compounds, as applied.</td>
<td>Table 1 – VOC Content Limits for Specialty Coatings, except for Large Appliance Parts or Products, and Metal Furniture subject to Section 5.4.1 Limits are expressed as grams of VOC/liter (or pounds of VOC/gallon) of coating, less water and less exempt compounds, as applied.</td>
<td></td>
</tr>
<tr>
<td>Requirement Category</td>
<td>SIP Version of Rule 4603 (10/16/08)</td>
<td>Non-SIP Version of Rule 4603 (9/17/09)</td>
<td>Conclusion</td>
</tr>
<tr>
<td>-----------------------</td>
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<td>---------------------------------------</td>
<td>------------</td>
</tr>
<tr>
<td>Camouflage</td>
<td>Baked 360 (3.0) Air-Dried 420 (3.5)</td>
<td>Baked 360 (3.0) Air-Dried 420 (3.5)</td>
<td></td>
</tr>
<tr>
<td>Extreme Performance</td>
<td>Baked 420 (3.5) Air-Dried 420 (3.5)</td>
<td>Baked 420 (3.5) Effective until December 31, 2010.</td>
<td></td>
</tr>
<tr>
<td>Heat Resistant</td>
<td>Baked 360 (3.0) Air-Dried 420 (3.5)</td>
<td>Baked 360 (3.0) Effective on and after January 1, 2011.</td>
<td></td>
</tr>
<tr>
<td>Extreme High Gloss</td>
<td>Baked 360 (3.0) Air-Dried 420 (3.5)</td>
<td>Air-Dried 420 (3.5)</td>
<td></td>
</tr>
<tr>
<td>High Performance Architectural</td>
<td>Baked 420 (3.5) Air-Dried 420 (3.5)</td>
<td>Baked 420 (3.5) Air-Dried 420 (3.5)</td>
<td></td>
</tr>
<tr>
<td>High Temperature</td>
<td>Baked 420 (3.5) Air-Dried 420 (3.5)</td>
<td>High Performance Architectural</td>
<td></td>
</tr>
<tr>
<td>Metallic Coating</td>
<td>Baked 360 (3.0) Air-Dried 420 (3.5)</td>
<td>Baked 420 (3.5) Air-Dried 420 (3.5)</td>
<td></td>
</tr>
<tr>
<td>Pretreatment Coating</td>
<td>Baked 360 (3.0) Air-Dried 420 (3.5)</td>
<td>High Temperature</td>
<td></td>
</tr>
<tr>
<td>Silicone Release</td>
<td>Baked 420 (3.5) Air-Dried 420 (3.5)</td>
<td>Metallic Coating</td>
<td></td>
</tr>
<tr>
<td>Solar Absorbent</td>
<td>Baked 360 (3.0) Air-Dried 420 (3.5)</td>
<td>Baked 360 (3.0) Air-Dried 420 (3.5)</td>
<td></td>
</tr>
<tr>
<td>Solid Film Lubricant</td>
<td>Baked 360 (3.0) Air-Dried 420 (3.5)</td>
<td>Pretreatment Coating</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Baked 360 (3.0) Air-Dried 420 (3.5)</td>
<td>Touch Up and Repair Coating</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Baked 360 (3.0) Air-Dried 420 (3.5)</td>
<td>Baked 360 (3.0) Effective on and after January 1, 2011.</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Baked 360 (3.0) Air-Dried 420 (3.5)</td>
<td>Air-Dried 420 (3.5) Effective on and after January 1, 2011.</td>
<td></td>
</tr>
<tr>
<td>Silicone Release</td>
<td>Baked 420 (3.5) Air-Dried 420 (3.5)</td>
<td>Silicone Release</td>
<td></td>
</tr>
<tr>
<td>Solar Absorbent</td>
<td>Baked 360 (3.0) Air-Dried 420 (3.5)</td>
<td>Baked 360 (3.0) Air-Dried 420 (3.5)</td>
<td></td>
</tr>
<tr>
<td>Solid Film Lubricant</td>
<td>Baked 360 (3.0) Air-Dried 420 (3.5)</td>
<td>Baked 880 (7.3) Air-Dried 880 (7.3)</td>
<td></td>
</tr>
</tbody>
</table>

5.3 In lieu of complying with the applicable VOC content limits of Section 5.1, or Table 1, an operator may control emissions from coating operations with an APCO-approved VOC emission control system that meets the requirements of Section 5.5.

5.4 Coating Limits for Large Appliance Parts or Products Coating Operation and Metal Furniture Coating Operation

5.4.1 Effective on and after April 16, 2009, an operator whose total actual VOC emissions from all large appliance parts or products coating operations, or metal furniture coating operations, including related cleaning activities, at a stationary source are equal to or greater than 3 tons of VOC per 12-month rolling period, before consideration of controls, shall not apply to any large appliance parts or products or metal furniture any coating with a VOC content in excess of the applicable limits in Table 2. In lieu of complying with the VOC content limits in Table 2, an operator may comply with Section 5.4.1.2.

No change to requirements from SIP approved version. Therefore, non-SIP version of rule is as stringent as SIP version.
Conclusion

Non-SIP Version of Rule 4603 (9/17/09)

with the applicable recordkeeping requirements of Section 6.2 to demonstrate if the VOC emissions from all large appliance parts or products coating operations, or metal furniture coating operations, including related cleaning activities, are equal to or greater than three (3) tons of VOC per 12-month rolling period.

5.4.1.2 In lieu of complying with the VOC content limits in Table 2, an operator may operate a VOC control system that meets the applicable requirements of Section 5.5.

5.4.2 An operator of large appliance parts or products coating operations, or metal furniture coating operations whose total actual VOC emissions from all large appliance parts or products coating operations, or metal furniture coating operations, including related cleaning activities, at a stationary source are less than three (3) tons of VOC per 12-month rolling period, before consideration of controls, shall comply with the applicable VOC content limits of coatings specified in Sections 5.1 and 5.2. An operator shall comply with the applicable recordkeeping requirements of Section 6.2 to demonstrate if the VOC emissions from all large appliance parts or products coating operations, or metal furniture coating operations, including related cleaning activities, are less than three (3) tons of VOC per 12-month rolling period.

Table 2 - VOC Content Limits for Large Appliance Parts or Products, and Metal Furniture Coating Operations subject to Section 5.4.1 Limits are expressed as grams of VOC/liter (or pounds of VOC/gallon) of coating, less water and less exempt compounds, as applied.

<table>
<thead>
<tr>
<th>Coating Type</th>
<th>SIP Version of Rule 4603 (10/16/08)</th>
<th>Non-SIP Version of Rule 4603 (9/17/09)</th>
</tr>
</thead>
<tbody>
<tr>
<td>General, One Component</td>
<td>Baked 275 (2.3) Air-Dried 275 (2.3)</td>
<td>Baked 275 (2.3) Air-Dried 275 (2.3)</td>
</tr>
<tr>
<td>General, Multi-Component</td>
<td>Baked 275 (2.3) Air-Dried 340 (2.8)</td>
<td>Baked 275 (2.3) Air-Dried 340 (2.8)</td>
</tr>
<tr>
<td>Extreme High Gloss</td>
<td>Baked 360 (3.0) Air-Dried 340 (2.8)</td>
<td>Baked 360 (3.0) Air-Dried 340 (2.8)</td>
</tr>
<tr>
<td>Extreme Performance</td>
<td>Baked 360 (3.0) 420 Air-Dried (3.5)</td>
<td>Baked 360 (3.0) 420 Air-Dried (3.5)</td>
</tr>
</tbody>
</table>

Table 2 - VOC Content Limits for Large Appliance Parts or Products, and Metal Furniture Coating Operations subject to Section 5.4.1 Limits are expressed as grams of VOC/liter (or pounds of VOC/gallon) of coating, less water and less exempt compounds, as applied.

<table>
<thead>
<tr>
<th>Coating Type</th>
<th>SIP Version of Rule 4603 (10/16/08)</th>
<th>Non-SIP Version of Rule 4603 (9/17/09)</th>
</tr>
</thead>
<tbody>
<tr>
<td>General, One Component</td>
<td>Baked 275 (2.3) Air-Dried 275 (2.3)</td>
<td>Baked 275 (2.3) Air-Dried 275 (2.3)</td>
</tr>
<tr>
<td>General, Multi-Component</td>
<td>Baked 275 (2.3) Air-Dried 340 (2.8)</td>
<td>Baked 275 (2.3) Air-Dried 340 (2.8)</td>
</tr>
<tr>
<td>Extreme High Gloss</td>
<td>Baked 360 (3.0) Air-Dried 340 (2.8)</td>
<td>Baked 360 (3.0) Air-Dried 340 (2.8)</td>
</tr>
<tr>
<td>Extreme Performance</td>
<td>Baked 360 (3.0) 420 Air-Dried (3.5)</td>
<td>Baked 360 (3.0) 420 Air-Dried (3.5)</td>
</tr>
<tr>
<td>Requirement Category</td>
<td>SIP Version of Rule 4603 (10/16/08)</td>
<td>Non-SIP Version of Rule 4603 (9/17/09)</td>
</tr>
<tr>
<td>----------------------</td>
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</tr>
<tr>
<td>Heat Resistant</td>
<td>Baked 360 (3.0) Air-Dried 420 (3.5)</td>
<td>Heat Resistant Baked 360 (3.0) Air-Dried 420 (3.5)</td>
</tr>
</tbody>
</table>
5.5.2 An operator of plastic parts and products coating operations whose total actual VOC emissions from all metal parts and products, plastic parts and products, automotive/transportation and business machine plastic parts and products, and pleasure craft coating operations, including related cleaning activities, at a stationary source are less than 2.7 tons of VOC per 12-month rolling period, before consideration of controls, are not subject to the coating limits in Table 3. However, the operator shall comply with the applicable recordkeeping requirements of Section 6.2 and calculate the VOC emission to demonstrate if the VOC emissions from all metal parts and products, plastic parts and products, automotive/transportation and business machine plastic parts and products, and pleasure craft coating operations, including related cleaning activities are less than 2.7 tons of VOC per 12-month rolling period.

Table 3 - VOC Content Limits for Plastic Parts and Products Coating Operations Subject to Section 5.5.1, except for Automotive/Transportation and Business Machine Plastic Parts and Products that are subject to Section 5.6. Limits are expressed as grams of VOC/liter (or pounds of VOC/gallon) of coating, less water and less exempt compounds, as applied.

<table>
<thead>
<tr>
<th>Coating Type</th>
<th>General One-Component</th>
<th>General Multi-Component</th>
<th>Electric Dissipating Coatings and Shock-Free Coatings</th>
<th>Extreme Performance</th>
<th>Metallic</th>
<th>Military Specification</th>
<th>Mold-Seal</th>
<th>Multi-colored Coatings</th>
<th>Optical Coatings</th>
<th>Vacuum-Metalizing</th>
</tr>
</thead>
<tbody>
<tr>
<td>Coat Type</td>
<td>280 (2.3)</td>
<td>420 (3.5)</td>
<td>800 (6.7)</td>
<td>420 (3.5)</td>
<td>420 (3.5)</td>
<td>340 (2.8) for 1 pack</td>
<td>420 (3.5)</td>
<td>760 (6.3)</td>
<td>680 (5.7)</td>
<td>600 (6.7)</td>
</tr>
<tr>
<td>Conclusion</td>
<td>5.5.2</td>
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<tr>
<td>Requirement Category</td>
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<td>Non-SIP Version of Rule 4603 (9/17/09)</td>
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<td>Requirement Category</td>
<td>SIP Version of Rule 4603 (10/16/08)</td>
<td>Non-SIP Version of Rule 4603 (9/17/09)</td>
<td>Conclusion</td>
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<tr>
<td>Operations On and after January 1, 2011, an operator of automotive/transportation and business machine plastic parts and products coating operations shall comply with the applicable requirements of Section 5.6.1 or Section 5.6.2.</td>
<td>5.6.1 An operator whose total actual VOC emissions from all metal parts and products, plastic parts and products, automotive/transportation and business machine plastic parts and products, and pleasure craft coating operations, including related cleaning activities, at a stationary source are equal to or greater than 2.7 tons of VOC per 12-month rolling period, before consideration of controls, shall not apply to any automotive/transportation and business machine plastic parts and products any coating with a VOC content in excess of the applicable limits in Table 4. 5.6.1.1 An operator shall comply with the applicable recordkeeping requirements of Section 6.2 to calculate the VOC emission to demonstrate if the VOC emissions from all metal parts and products, plastic parts and products, automotive/transportation and business machine plastic parts and products, and pleasure craft coating operations, including related cleaning activities, are equal to or greater than 2.7 tons of VOC per 12-month rolling period. 5.6.1.2 In lieu of complying with the VOC content limits in Table 3, an operator may operate a VOC control system that meets the applicable requirements of Section 5.8. 5.6.2 An operator of automotive/transportation and business machine plastic parts and products coating operations whose total actual VOC emissions from all metal parts and products, plastic parts and products, automotive/transportation and business machine plastic parts and products, and pleasure craft coating operations, including related cleaning activities, at a stationary source are less than 2.7 tons of VOC per 12-month rolling period, before consideration of controls, are not subject to the coating limits in Table 4. However, the operator shall comply with the applicable recordkeeping requirements of Section 6.2 and calculate the VOC emission to demonstrate if the VOC emissions from all metal parts and products, plastic parts and products, automotive/transportation and business machine plastic parts and products, and pleasure craft coating operations, including</td>
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<td>Requirement Category</td>
<td>SIP Version of Rule 4603 (10/16/08)</td>
<td>Non-SIP Version of Rule 4603 (9/17/09)</td>
<td>Conclusion</td>
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<td>related cleaning activities are less than 2.7 tons of VOC per 12-month rolling period.</td>
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</table>

Table 4 - VOC Content Limits for Automotive/Transportation and Business Machine Plastic Parts and Products Coating Operations Subject to Section 5.6.1 Limits are expressed as grams of VOC/liter (or pounds of VOC/gallon) of coating, less water and less exempt compounds, as applied.

VOC Content Limit For Automotive/Transportation Plastic Parts and Products Coatings

**Coating Type**

I. High Baked Coatings – Interior and Exterior
   - Flexible Primer
     - 540 (4.5)
   - Non-flexible Primer
     - 420 (3.5)
   - Basecoat 520 (4.3)
   - Clearcoat
     - 480 (4.0)
   - Non-basecoat/clearcoat
     - 520 (4.3)

II. Low Bake/Air-Dried Coatings – Exterior Parts
   - Primers
     - 580 (4.8)
   - Basecoat
     - 600 (5.0)
   - Clearcoat
     - 540 (4.5)
   - Non-basecoat/clearcoat
     - 600 (5.0)

III. Low Bake/Air-Dried Coatings – Interior parts
   - 600 (5.0)

IV. Touch-up and Repair Coatings
   - 620 (5.2)

VOC Content Limit For Business Machine Plastic Parts and Products Coatings

Primer
   - 350 (2.9)
Topcoat
   - 350 (2.9)
Texture Coat
   - 350 (2.9)
Fog Coat
   - 260 (2.2)
Touch-up and Repair
   - 350 (2.9)

5.7 Pleasure Craft Coating Operations On and after January 1, 2011, an operator of pleasure craft coating operations shall comply with the applicable requirements of Section 5.7.1 or Section 5.7.2.
<table>
<thead>
<tr>
<th>Requirement Category</th>
<th>SIP Version of Rule 4603 (10/16/08)</th>
<th>Non-SIP Version of Rule 4603 (9/17/09)</th>
<th>Conclusion</th>
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</thead>
<tbody>
<tr>
<td>5.7.1 An operator whose total actual VOC emissions from all metal parts and products, plastic parts and products, automotive/transportation and business machine plastic parts and products, and pleasure craft coating operations, including related cleaning activities, at a stationary source are equal to or greater than 2.7 tons of VOC per 12-month rolling period, before consideration of controls, shall not apply any coatings on pleasure crafts with a VOC content in excess of the applicable limits in Table 5. 5.7.1.1 An operator shall comply with the applicable recordkeeping requirements of Section 6.2 to demonstrate if the VOC emissions from all metal parts and products, plastic parts and products, automotive/transportation and business machine plastic parts and products, and pleasure craft coating operations, including related cleaning activities, are equal to or greater than 2.7 tons of VOC per 12-month rolling period</td>
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<tr>
<td>5.7.2 An operator of pleasure craft coating operations whose total actual VOC emissions from all metal parts and products, plastic parts and products, automotive/transportation and business machine plastic parts and products, and pleasure craft coating operations, including related cleaning activities, at a stationary source are less than 2.7 tons of VOC per 12-month rolling period, before consideration of controls, are not subject to the coating limits in Table 5. However, the operator shall comply with the applicable recordkeeping requirements of Section 6.2 calculate the VOC emission to demonstrate if the VOC emissions from all metal parts and products, plastic parts and products, automotive/transportation and</td>
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### Requirement Category

<table>
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<tr>
<th>Requirement Category</th>
<th>SIP Version of Rule 4603 (10/16/08)</th>
<th>Non-SIP Version of Rule 4603 (9/17/09)</th>
<th>Conclusion</th>
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<tr>
<td>5.5 VOC Emission Control System Requirements In lieu of complying with applicable provisions of Sections 5.1, 5.2, 5.4, 5.7, or 5.9, an operator may use a VOC emission control system that controls emissions from the source operation and meets the requirements of Sections 5.5.1 through 5.5.4.</td>
<td>5.8 VOC Emission Control System Requirements In lieu of complying with applicable provisions of Sections 5.1, 5.2, 5.4, 5.5, 5.6, 5.7, 5.10, or 5.12, an operator may use a VOC emission control system that controls emissions from the source operation and meets the requirements of Sections 5.8.1 through 5.8.4.</td>
<td>No change to requirements from SIP approved version. Therefore, non-SIP version of rule is as stringent as SIP version.</td>
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<tr>
<td>5.5.1 The VOC emission control system shall be under District permit.</td>
<td>5.8.1 The VOC emission control system shall be under District permit.</td>
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<td>5.5.2 The VOC emission control system shall comply with the requirements of Sections 5.5.3 and 5.5.4 during periods of emission-producing activities.</td>
<td>5.8.2 The VOC emission control system shall comply with the requirements of Sections 5.8.3 and 5.8.4 during periods of emission-producing activities.</td>
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<td>5.5.3 The VOC emission control system shall be operated with an overall capture and control efficiency of at least 90 percent by weight as determined in Section 6.3.</td>
<td>5.8.3 The VOC emission control system shall be operated with an overall capture and control efficiency of at least 90 percent by weight as determined in Section 6.3.</td>
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<td>5.5.4 Use of a VOC emission control system shall not result in emissions in excess of those that would have been emitted had the operator complied with the applicable provisions of Sections 5.1, 5.2, 5.4, 5.7, or 5.9.</td>
<td>5.8.4 Use of a VOC emission control system shall not result in emissions in excess of those that would have been emitted had the operator complied with the applicable provisions of Sections 5.1, 5.2, 5.4, 5.5, 5.6, 5.7, 5.10 or 5.12.</td>
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<td>5.5.4.1 The following equation shall be used to determine if business machine plastic parts and products, and pleasure craft coating operations, including related cleaning activities are less than 2.7 tons of VOC per 12-month rolling period.</td>
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Table 5 - VOC Content Limits for Pleasure Craft Coating Operations Subject to Section 5.7.1 Limits are expressed as grams of VOC/liter (or pounds of VOC/gallon) of coating, less water and less exempt compounds, as applied.

**Coating Type**

- Extreme High Gloss Topcoat: 490 (4.1)
- High Gloss Topcoat: 420 (3.5)
- Pretreatment Wash Primer: 780 (5.5)
- Finish Primer Surfacer: 420 (3.5)
- High Build Primer Surfacer: 340 (2.8)
- Aluminum Substrate Antifoulant Coating: 560 (4.7)
- Other Substrate Antifoulant Coating: 330 (2.8)
- All other pleasure craft surface coatings for metal or plastic: 420 (3.5)
<table>
<thead>
<tr>
<th>Requirement Category</th>
<th>SIP Version of Rule 4603 (10/16/08)</th>
<th>Non-SIP Version of Rule 4603 (9/17/09)</th>
<th>Conclusion</th>
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<td>the minimum required overall capture and control efficiency of an emission control system is at an equivalent or greater level of VOC reduction as would be achieved using compliant materials, equipment, or work practices, as stated in Section 5.5.</td>
<td>5.8.4.1 The following equation shall be used to determine if the minimum required overall capture and control efficiency of an emission control system is at an equivalent or greater level of VOC reduction as would be achieved using compliant materials, equipment, or work practices, as stated in Section 5.5.</td>
<td>No change to requirements from SIP approved version. Therefore, non-SIP version of rule is as stringent as SIP version.</td>
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<td>CE = Minimum Required Control Efficiency, percent</td>
<td>CE = Minimum Required Control Efficiency, percent</td>
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<td></td>
<td>VOCLWc = VOC Limit of Rule 4603, less water and less exempt compounds</td>
<td>VOCLWc = VOC Limit of Rule 4603, less water and less exempt compounds</td>
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<tr>
<td></td>
<td>VOCLWn,Max = Maximum VOC content of coating (or solvent) used in conjunction with a control device, less water and less exempt compounds</td>
<td>VOCLWn,Max = Maximum VOC content of coating (or solvent) used in conjunction with a control device, less water and less exempt compounds</td>
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<td>Dn,Max = Density of solvent, reducer, or thinner contained in the noncompliant coating (or cleaning solvent), containing the maximum VOC content of the multicomponent (or cleaning solvent)</td>
<td>Dn,Max = Density of solvent, reducer, or thinner contained in the noncompliant coating (or cleaning solvent), containing the maximum VOC content of the multicomponent (or cleaning solvent)</td>
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<td></td>
<td>Dc = Density of corresponding solvent, reducer, or thinner used in the compliant coating (or cleaning solvent) system = 880 gm/liter.</td>
<td>Dc = Density of corresponding solvent, reducer, or thinner used in the compliant coating (or cleaning solvent) system = 880 gm/liter.</td>
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</table>

### 5.6 Work Practice Standards for Large Appliance Parts and Products, and Metal Furniture Coating Operations and Cleaning Materials Subject to Section 5.4.1

**Effective on and after April 16, 2009,** an operator shall minimize VOC emissions by complying with the following work practice standards:

5.6.1 Store all VOC-containing coatings, thinners, cleaning materials, and waste materials in closed containers. The containers shall remain closed at all times, except when specifically in use.

5.6.2 Close mixing vessels that contain VOC coatings and other materials, except when specifically in use.

5.6.3 Minimize spills of any VOC-containing materials and clean up spills immediately.

5.6.4 Convey VOC-containing materials

### 5.9 Work Practice Standards

5.9.1 **An operator of large appliance parts and products, and metal furniture coating operations shall minimize VOC emissions by complying with the work practice standards specified in Sections 5.9.3 through 5.9.6.**

5.9.2 **Effective on and after January 1, 2011,** an operator of metal parts and products coating operations, automotive/transportation and business machine plastic parts and products coating operations, and pleasure craft coating operations shall minimize VOC emissions by complying with work practice standards specified in Sections 5.9.3 through 5.9.6.
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<th>Requirement Category</th>
<th>SIP Version of Rule 4603 (10/16/08)</th>
<th>Non-SIP Version of Rule 4603 (9/17/09)</th>
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<td>in closed containers or pipes.</td>
<td>5.9.3 Store all VOC-containing coatings, thinners, cleaning materials, and waste materials in closed non-absorbent and non-leaking containers. The containers shall remain closed at all times, except when specifically in use.</td>
<td>No change to requirements from SIP approved version. Therefore, non-SIP version of rule is as stringent as SIP version.</td>
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<tr>
<td>5.7 Organic Solvent Cleaning Requirements</td>
<td></td>
<td>5.9.4 Close mixing vessels that contain VOC coatings and other materials, except when specifically in use. 5.9.5 Minimize spills of any VOC-containing materials and clean up spills immediately. 5.9.6 Convey VOC-containing materials in closed containers or pipes.</td>
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<td>5.7.1 An operator shall not use organic solvents for cleaning operations that exceed the VOC content limits specified in Table 3, in accordance with the corresponding effective date. Table 3 – VOC Content Limits for Organic Solvents Used in Cleaning Operations Effective November 15, 2003 through September 20, 2008 Type of Solvent Cleaning Operation VOC Content Limit Grams of VOC/liter of material (lb/gal) A. Product Cleaning During Manufacturing Process or Surface Preparation for Coating Application 50 (0.42) B. Repair and Maintenance Cleaning 50 (0.42) C. Cleaning of Coating Application Equipment 550 (4.6) Effective on and after September 21, 2008 Type of Solvent Cleaning Operation VOC Content Limit Grams of VOC/liter of material (lb/gal) A. Product Cleaning During Manufacturing Process or Surface Preparation for Coating Application 25 (0.21) B. Repair and Maintenance Cleaning 25 (0.21) C. Cleaning of Coating Application Equipment 25 (0.21)</td>
<td>5.10 Organic Solvent Cleaning Requirements 5.10.1 An operator shall not use organic solvents for cleaning operations that exceed the VOC content limits specified in Table 6. 5.10.2 An operator shall perform all solvent cleaning operations with cleaning material having VOC content of 25 g/L or less, unless such cleaning operations are performed within the control of an APCO-approved VOC emission control system that meets the requirements of Section 5.8. Table 6 – VOC Content Limits for Organic Solvents Used in Cleaning Operations Limits are expressed as grams of VOC/liter (or pounds of VOC/gallon) of material Type of Solvent Cleaning Operation VOC Content Limit A. Product Cleaning During Manufacturing Process or Surface Preparation for Coating Application 25 (0.21) B. Repair and Maintenance Cleaning 25 (0.21) C. Cleaning of Coating Application Equipment 25 (0.21)</td>
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<td>5.7.2 Until September 20, 2008, an operator performing Table 3 Category C cleaning outside of an APCO-approved VOC emission control system and using solvent with VOC content greater than 50 g/L shall meet the requirements of Sections 5.7.3 through 5.7.5 in addition to meeting the VOC content limit of</td>
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<td>Requirement Category</td>
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| Table 3 for this cleaning operation. On and after September 21, 2008, an operator shall perform all solvent cleaning operations with cleaning material having VOC content of 25 g/L or less, unless such cleaning operations are performed within the control of an APCO-approved VOC emission control system that meets the requirements of Section 5.5. Sections 5.7.3 through 5.7.5 shall not apply on and after September 21, 2008. | 5.7.3 Cleaning activities that use solvents shall be performed by one or more of the following methods:  
5.7.3.1 Wipe cleaning; or  
5.7.3.2 Application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; or  
5.7.3.3 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  
5.7.3.4 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 | 5.7.4 Solvent shall not be atomized into the open air unless it is vented to an APCO-approved VOC emission control system that complies with Section 5.5. 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 described in Section 5.7.3.2. |
<p>| 5.7.5 An operator 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 be equally effective at controlling emissions is used for | Conclusion |</p>
<table>
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<th>Requirement Category</th>
<th>SIP Version of Rule 4603 (10/16/08)</th>
<th>Non-SIP Version of Rule 4603 (9/17/09)</th>
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<td>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.</td>
<td>5.7.6 In lieu of complying with the VOC content limits of Table 3 or the provisions of Sections 5.7.3 through 5.7.5, an operator may control emissions from cleaning operations with an APCO-approved VOC emission control system that meets the requirements of Section 5.5.</td>
<td>5.11 Solvent Storage and Disposal Requirements</td>
<td>No change to requirements from SIP approved version. Therefore, non-SIP version of rule is as stringent as SIP version.</td>
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<tr>
<td>5.8 Solvent Storage and Disposal Requirements</td>
<td>An operator shall store or dispose of fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc. coatings, adhesives, catalysts, and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty.</td>
<td>An operator shall store or dispose of fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc. coatings, adhesives, catalysts, and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty.</td>
<td>No change to requirements from SIP approved version. Therefore, non-SIP version of rule is as stringent as SIP version.</td>
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<tr>
<td>5.9 Application Equipment Requirements: An operator shall not use or operate any coating application equipment on any metal parts and products subject to the provisions of this rule unless one of the following methods is used: 5.9.1 Electrostatic application; 5.9.2 Electrodeposition; 5.9.3 High-Volume, Low-Pressure (HVLP) spray, 5.9.3.1 High-Volume, Low-Pressure (HVLP) spray equipment shall be operated in accordance with the manufacturer's recommendations. 5.9.3.2 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 technical 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; 5.9.3.3 A person shall not sell or offer for sale for use within the District any HVLP spray</td>
<td>5.12 Application Equipment Requirements: An operator shall not use or operate any coating application equipment on any metal parts and products, large appliances parts and products, metal furniture, plastic parts and products, automotive/transportation and business machine plastic parts and products, and pleasure crafts subject to the provisions of this rule unless one of the following methods is used: 5.12.1 Electrostatic application; 5.12.2 Electrodeposition; 5.12.3 High-Volume, Low-Pressure (HVLP) spray, 5.12.3.1 High-Volume, Low-Pressure (HVLP) spray equipment shall be operated in accordance with the manufacturer's recommendations. 5.12.3.2 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 technical material or by a demonstration using a certified air pressure tip gauge, measuring the air atomizing pressure dynamically at the</td>
<td>No change to requirements from SIP approved version. Therefore, non-SIP version of rule is as stringent as SIP version.</td>
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<tr>
<td>Requirement Category</td>
<td>SIP Version of Rule 4603 (10/16/08)</td>
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<td>gun without a permanent marking denoting the maximum inlet air pressure in psig at which the gun will operate within the parameters specified in Section 3.0.</td>
<td>center of the air cap and at the air horns. 5.12.3.3 A person shall not sell or offer for sale for use within the District any HVLP spray gun without a permanent marking denoting the maximum inlet air pressure in psig at which the gun will operate within the parameters specified in Section 3.0.</td>
<td>No change to requirements from SIP approved version. Therefore, non-SIP version of rule is as stringent as SIP version.</td>
</tr>
<tr>
<td>6.0 Administrative Requirements</td>
<td>6.1 Labeling Requirements 6.1.1 Coating VOC Content: each container or accompanying data sheet of any coating subject to this rule shall display the maximum VOC content of the coating, as applied, and after any thinning as recommended by the manufacturer. VOC content shall be displayed as grams of VOC per liter of coating (less water and exempt compounds). VOC content displayed may be calculated using product formulation data, or may be determined using the test method in Section 5.9.9. If the VOC content is unknown, a value of 5 grams per liter shall be assumed.</td>
<td>6.1 Labeling Requirements 6.1.1 Coating VOC Content: Each container or accompanying data sheet of any coating subject to this rule shall display the maximum VOC content of the coating, as applied, and after any thinning as recommended by the manufacturer. VOC content shall be displayed as grams of VOC per liter of coating (less water and exempt compounds). VOC content displayed may be calculated using product formulation data, or may be determined using the test method in Section 5.9.9. If the VOC content is unknown, a value of 5 grams per liter shall be assumed.</td>
<td>No change to requirements from SIP approved version. Therefore, non-SIP version of rule is as stringent as SIP version.</td>
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<tr>
<td>6.2 Recordkeeping</td>
<td>An operator subject to Section 5.0 or exempt by Section 4.1 shall comply with the following requirements:</td>
<td>An operator subject to Section 5.0 or exempt by Sections 4.1, 4.8.5, 4.8.9 and 4.9 shall comply with the following requirements:</td>
<td>No change to requirements from SIP approved version. Therefore, non-SIP version of rule is as stringent as SIP version.</td>
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<tr>
<td>6.2.2 Maintain daily records which include the following information:</td>
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<td>6.2.2.1 volume coating/solvent mix ratio,</td>
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<td>6.2.2.2 VOC content (lb/gal or grams/liter) and, for dip coating operations, viscosity (cSt) of coating,</td>
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<tr>
<td>6.2.2.3 volume of each coating used (gallons), and</td>
<td>6.2.2.3 volume of each coating used (gallons), and</td>
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<td>6.2.2.4 quantity of cleanup solvent used (gallons).</td>
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<td>6.2.3 VOC Emission Control System Records</td>
<td>An operator using a VOC emission control system pursuant to Section 5.5 as a means of complying with this rule shall maintain records of key</td>
<td>An operator using a VOC emission control system pursuant to Section 5.8 as a means of complying with this rule shall maintain records of</td>
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<td>6.2.3 VOC Emission Control System Records</td>
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<tr>
<td>6.1.2 Thinning Recommendations Each container or accompanying data sheet of any coating subject to this rule shall display a statement of the manufacturer's recommendation regarding thinning of the coating. This requirement shall not apply to the thinning of coatings with water.</td>
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<tr>
<td>6.1.3 Solvent Compliance Statement Requirements Manufacturers of any solvents subject to this rule shall indicate on the solvent container, or on a separate product data sheet or material safety data sheet, the name of the solvent, manufacturer's name, the VOC content, and density of the solvent, as supplied. The VOC content shall be expressed in units of gm/liter or lb/gallon.</td>
<td>6.1.3 Solvent Compliance Statement Requirements Manufacturers of any solvents subject to this rule shall indicate on the solvent container, or on a separate product data sheet or material safety data sheet, the name of the solvent, manufacturer's name, the VOC content, and density of the solvent, as supplied. The VOC content shall be expressed in units of gm/liter or lb/gallon.</td>
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<td>6.3 For determination of compliance and enforcement of the limits specified in Section 5.0 of this rule, the VOC content of any coating determined to exceed its applicable limit through the use of either product formulation data or the test method in Section 6.3.1 shall constitute a violation of this rule.</td>
<td>6.3 For determination of compliance and enforcement of the limits specified in Section 5.0 of this rule, the VOC content of any coating determined to exceed its applicable limit through the use of either product formulation data or the test method in Section 6.3.1 shall constitute a violation of this rule.</td>
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<td>system operating parameters which will demonstrate continuous operation and compliance of the emission control system during periods of emission producing activities. Key system operating parameters are those necessary to ensure compliance with VOC limits. The parameters include, but are not limited to, temperatures, pressures, and flowrates.</td>
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<td>No change to requirements from SIP approved version. Therefore, non-SIP version of rule is as stringent as SIP version.</td>
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<td>6.2.4 Consistent records may be kept in grams/liter and liters instead of pounds/gallon and gallons. An operator of a stationary source subject to this rule shall maintain such records on a daily basis. An operator that is subject to the exemption of Section 4.1 may maintain usage records of non-compliant coatings on the days that such non-compliant coatings are used.</td>
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<td>6.2.5 The operator shall retain the records specified in Sections 6.2.1 through 6.2.4, as applicable, on site for a period of five years, make the records available on site during normal business hours to the APCO, ARB, or EPA and submit the records to the APCO, ARB, or EPA upon request.</td>
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<td>6.3 Test Methods The following test methods shall be used to determine compliance with the provisions of this rule. Alternate test methods may be used provided they are approved by the APCO, ARB, and EPA.</td>
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<td>6.3.1 VOC content of coatings and solvents shall be analyzed by EPA Method 24 and analysis of halogenated exempt compounds shall be analyzed by ARB Method 432.</td>
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<td>6.3.2 Emissions of VOC shall be measured by EPA Method 25, 25A, or 25B, as applicable, and analysis of halogenated exempt compounds shall be analyzed by ARB Method 422.</td>
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<td>6.3.3 The viscosity of coatings used for dip coating of steel joists as specified in Section 5.1.3 of this rule, shall be determined by using ASTM D5478-98 or ASTM D5125-97.</td>
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<td>6.3.4 The quantification of coating as a metallic/iridescent topcoat shall be determined by SCAQMD Method 318 (Determination of Weight Percent of Elemental Metal in Coatings by X-ray Diffraction Method), July 1996.</td>
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<td>6.3.7 Determination of Overall Capture and Control Efficiency of VOC Emission Control Systems shall be made using the following methods:</td>
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<tr>
<td>6.3.7.1 The capture efficiency of a VOC emission control system's collection device shall be determined according to EPA's &quot;Guidelines for Determining Capture Efficiency,&quot; January 9, 1995 and 40 CFR 51, Appendix M, Methods 204-204F, as applicable.</td>
<td>6.3.7.1 The capture efficiency of a VOC emission control system's collection device shall be determined according to EPA's &quot;Guidelines for Determining Capture Efficiency,&quot; January 9, 1995 and 40 CFR 51, Appendix M, Methods 204-204F, as applicable.</td>
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<td>6.3.7.1.1 Capture Efficiency, in percent, is the ratio of the weight of VOC in the effluent stream entering the control device to the weight of VOC emitted from wood product coating operation or flat wood paneling product coating operation, both measured simultaneously, shall be calculated by the following equation:</td>
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| Capture Efficiency (%) = \((W_c + W_e) \times 100\)  
Where:  
\(W_c\) = weight of VOC entering the control device  
\(W_e\) = weight of VOC emitted | Capture Efficiency (%) = \((W_c + W_e) \times 100\)  
Where:  
\(W_c\) = weight of VOC entering the control device  
\(W_e\) = weight of VOC emitted | | |
<p>| 6.3.7.2 The control efficiency of a VOC emission control system's VOC control device shall be determined using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at the inlet and outlet of the control device. EPA Method 18 or ARB Method 422 shall be used to determine the emissions of exempt compounds. | 6.3.7.2 The control efficiency of a VOC emission control system's VOC control device shall be determined using EPA Methods 2, 2A, or 2D for measuring flow rates and EPA Methods 25, 25A, or 25B for measuring total gaseous organic concentrations at the inlet and outlet of the control device. EPA Method 18 or ARB Method 422 shall be used to determine the emissions of exempt compounds. | | |
| 6.3.7.2.1 Control Efficiency, in percent, is the ratio of the weight of VOC removed by the control device from the effluent stream entering the control device to the weight of VOC in the effluent stream entering the control device, both measured simultaneously, shall be calculated by the following equation: |
| Control Device Efficiency (%) = ([{(W_c - W_a) + \frac{W_c}{2}} \times 100) | Control Device Efficiency (%) = ([{(W_c - W_a) + \frac{W_c}{2}} \times 100) | |</p>
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| Where: Wc = weight of VOC entering the control device
Wa = weight of VOC discharged from the control device | Where: Wc = weight of VOC entering the control device
Wa = weight of VOC discharged from the control device | 6.3.7.3 For VOC emission control systems that consist of a single VOC emission collection device connected to a single VOC emission control device, the overall capture and control efficiency shall be calculated by using the following equation:

CECapture and Control = [ CECapture x CEControl ] / 100

Where:
CECapture and Control = Overall Capture and Control Efficiency, in percent
CECapture = Capture Efficiency of the collection device, in percent, as determined in Section 6.3.7.1
CEControl = Control Efficiency of the control device, in percent, as determined in Section 6.3.7.2. | No change to requirements from SIP approved version.
Therefore, non-SIP version of rule is as stringent as SIP version. |
| 6.3.8 The transfer efficiency of alternative coating application methods shall be determined in accordance with the SCAQMD Method “Spray Equipment Transfer Efficiency Test Procedure for Equipment User,” May 24, 1989. | 6.3.8 The transfer efficiency of alternative coating application methods pursuant to Section 5.12.9 shall be determined in accordance with the SCAQMD Method “Spray Equipment Transfer Efficiency Test Procedure for Equipment User,” May 24, 1989. | 6.4 Multiple Test Methods
When more than one test method or set of test methods is specified for any testing, a violation of any requirement of this rule established by any one of the specified test methods or set of test methods shall constitute a violation of this rule. | 6.4 Multiple Test Methods
When more than one test method or set of test methods is specified for any testing, a violation of any requirement of this rule established by any one of the specified test methods or set of test methods shall constitute a violation of this rule. |
| 6.5 Version of Test Methods
All ASTM test methods referenced in Section 6.0 are the most recently EPA approved version that appears in the CFR as Materials Approved for Incorporation by Reference. | | | |

**Conclusion**

No change to requirements from SIP approved version.
Therefore, non-SIP version of rule is as stringent as SIP version.