

**SAN JOAQUIN VALLEY UNIFIED
AIR POLLUTION CONTROL DISTRICT**

**Guideline for Expedited Application Review (GEAR)
Existing Wood Coating Operations**

Approved By: _____ Signed _____ Seyed Sadredin Director of Permit Services	Date: <u>8/3/98</u>
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Purpose: To outline procedures for processing of Permit to Operate (PTO) applications for wood coating operations which were in existence prior to December 19, 1991

I. Applicability

This policy applies to wood products coating operations subject to Rule 4606, "WOOD PRODUCTS COATING OPERATIONS", and which were in existence, but not yet permitted, prior to December 19, 1991, the adoption date of Rule 4606.

II. Permit Application and Supplementary Forms

The applicant must complete a regular application form and the Painting & Coating Operations Supplemental Form (see Attachment I). In addition the applicant must submit purchase or coating use records for the three years preceding June 19, 1992.

III. Background

Prior to formation of the San Joaquin Valley Unified Air Pollution control District, wood coating operations were not permitted uniformly throughout the valley. The eight valley counties had widely varying policies on the permit requirements for this source category: some counties required permits; some required permits only of the facility used 1000 gallons per year of wood coatings; some used a 10,000 gallon per year trigger; some did not require permits; and some did not permit sources due to a lack of county resources. This disparate treatment of similar sources within the District has resulted in unfairly limiting some operations. The Unified District Rules require any operation that may emit more than two pounds per day of any air contaminant be permitted. Most wood coating operations emit more than 2 pounds per day therefore permits are required.

IV. Policy

Wood product coating operations which were in existence prior to December 19, 1991, shall be granted a conditional Permit to Operate which limits annual Volatile Organic Compound (VOC) emissions to historical levels as of June 19, 1992.

Historical emission levels prior to June 19, 1992 shall be determined from purchase or coating-use records from the previous three years (June 19, 1989 - June 18, 1992), and shall be set to the same level as the highest 365-day period during those three years.

Facilities wishing to receive such a permit shall file an application for Permit to Operate and shall supply the District with all necessary information to substantiate their historical emission levels. Facilities which existed prior to 12/19/91 and have been initially permitted since the unification of the District may apply to have their permits re-issued within the guidelines of this policy.

New facilities established after December 19, 1991, and NSR modifications to existing facilities subsequent to that date, must apply for Authorities to Construct, and must comply with the District's "New and Modified Source Review Rule" (NSR, Rule 2201) in place at the time of application.

This policy does not apply to facilities which had received permits prior to December 19, 1991.

V. Application Review

In order to standardize the application reviews for this source category, the application review found in G:/per/gear/woodctrv.doc will be used as a base document. The document is based on a typical existing wood coating operation. The following pages are a hard copy version of this standard review. This hard copy version for the GEAR Policy manual includes a copy of the required supplemental application form (Attachment I) and the standard PTO conditions (Attachment II).

The use of this standard Application Review will ensure that the proposed project complies with all applicable prohibitory rules including Rule 4406 and will establish the facility's historical actual level of VOC emissions as described above.

Health Risk Assessment

HRA is not required as the application is for existing equipment with no change in potential to emit.

VI. Equipment Description

To ensure uniformity, the following standard description will be used:

*WOOD PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN(S),
PAINT SPRAY BOOTH WITH EXHAUST FILTERS AND SPRAY GUN
CLEANER*

VII. Permit to Operate Conditions

To ensure uniformity, a standard set of conditions will be used as a base for all applications (See Attachment II).

APPLICATION REVIEW
FOR
EXISTING WOOD COATING OPERATIONS

PTO APPLICATION REVIEW
WOOD COATING

Processing Engineer:
Lead Engineer (if applicable):
Date:

Facility Name:
Mailing Address:

Contact Name:
Phone:
Project Number:
Permit Number:

I. PROPOSAL:

[Facility Name] is applying for an Permit to Operate for an existing wood coating operation *with a paint spray booth*. The operation was originally installed [date installed] and will be permitted according to District Policy GEAR 15. *The booth does not have a current permit to operate. or The operator requests the PTO be changed as provided in Policy GEAR 15.*

II. APPLICABLE RULES:

Rule 2010	Permit Required (December 17, 1992)
Rule 4101	Visible Emissions (December 17, 1992)
Rule 4102	Nuisance (December 17, 1992)
Rule 4201	Particulate Matter Concentration (December 17, 1992)
Rule 4606	Wood Products Coating Operations (December 19, 1996)

III. PROJECT LOCATION:

The project is located at [Street Address] in [City], CA.

IV. PROCESS DESCRIPTION:

This paint spray operation will be used solely for wood coating operations. It will typically operate [*hours per day, days per week, weeks per year*].

V. EQUIPMENT LISTING:

Approved HVLP Spray Gun(s) or Electrostatic Spray Gun(s)
(Number) _____ HP Electric Compressor
One _____' Wide X _____' Long X _____' High Paint Spray Booth
(Number) _____ HP Exhaust Fan
(Type, i.e. paper, mesh, etc.) Filter System
Approved Gun Cleaner

VI. EMISSION CONTROL TECHNOLOGY EVALUATION:

A. Control Techniques

The operation includes *a paint spray booth an with exhaust filter system for particulate matter control, HVLP spray equipment for PM-10 and VOC control and an approved gun cleaner for VOC control during spray equipment clean-up.*

B. Best Available Control Technology (BACT)

BACT evaluation is not required because the emission unit is existing and not subject to Rule 2201 per Rule 2020 section 6.0.

VII. CALCULATIONS

Annual Emission Limits

Pursuant to District policy GEAR-15 the Historical emission levels prior to June 19, 1992 shall be determine the annual emission limitation for this facility. Based on *purchase or coating-use records* the highest 365-day period during the three years prior to June 19, 1991 has been determined to be XXXX lbs/year.

Include as an appendix or show here details of how the emission limitation was calculated.

VIII. COMPLIANCE

Rule 4102 - Nuisance

The facility is existing and does not have a history of nuisance problems. Continued compliance is therefore, expected. This project will not result in increased emissions therefore, a Health Risk Assessment is not required pursuant to District Policy Toxic 1.

Rule 4201 - Particulate Matter Concentration

Based on calculations/source tests of similar operations particulate matter emissions are not expected to exceed 0.1 gr./scf.

Rule 4606 - Wood Products Coating Operations

This operation is expected to comply with all the VOC limit, application method (HVLP guns), control, evaporative loss minimization, administrative, and recordkeeping requirements listed in this rule.

IX. RECOMMENDATION

Issue in-house PTO X-XXXX-X-X with the conditions listed on the attached draft Permit to Operate.

X. BILLING

The billing for this operation is based on a total electric motor horsepower including compressors and fans of XXXX hp.

PERMIT NUMBER	FEE SCHEDULE	FEE DESCRIPTION
X-XXXX-XX-X	3020-XX-X	

ATTACHMENT I

Supplemental Form

San Joaquin Valley Unified Air Pollution Control District
Supplemental Application Form

PAINTING & COATING OPERATIONS

This form must be accompanied by a completed Application for Authority to Construct and Permit to Operate form.

PERMIT TO BE ISSUED TO:
LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:

PROCESS DESCRIPTION

Items Painted	<input type="checkbox"/> Motor Vehicles <input type="checkbox"/> Wood Products <input type="checkbox"/> Metal Parts and Products <input type="checkbox"/> Aerospace Parts <input type="checkbox"/> Can and Coil <input type="checkbox"/> Other:
Drying Method	<input type="checkbox"/> Air Dried <input type="checkbox"/> Heat Dried <input type="checkbox"/> UV Cured

EQUIPMENT DESCRIPTION

Application Method	<input type="checkbox"/> HVLP <input type="checkbox"/> Electrostatic <input type="checkbox"/> Electrodeposition <input type="checkbox"/> Air-Assisted Airless <input type="checkbox"/> Roll Coat <input type="checkbox"/> Airless <input type="checkbox"/> Conventional <input type="checkbox"/> Brush <input type="checkbox"/> Other:			
Applicator Data	Manufacturer:		Model:	
	Manufacturer:		Model:	
Compressor Data	<input type="checkbox"/> Electric <input type="checkbox"/> Gasoline <input type="checkbox"/> Diesel		Motor HP Rating:	
Paint Booth Data	Type	<input type="checkbox"/> Closed <input type="checkbox"/> Open-Faced <input type="checkbox"/> Conveyorized		
	Manufacturer:		Model:	
	Dimensions	Length: ft	Width: ft	Height: ft
	Filtration Method	<input type="checkbox"/> Dry Filters <input type="checkbox"/> Water-Wash <input type="checkbox"/> Oil-Wash		
	Exhaust Filter(s): Qty		Size (ea): ____w ____h ____t	
	Fan: Dia. ____" Motor HP Rating		Exhaust Flow Rate: cfm	
	Stack Diameter: ft		Stack Height: ft	
	<i>(If the Paint Booth has a Natural Gas Burner, complete the following line)</i>			
	Maximum Heat Input Rating:			Btu/hour
	Gun Cleaner Data	Manufacturer:		Model:
Solvent (Brand/Trade Name):		VOC:	lb/gal	

1. If a separate Dryer is used, include a completed BOILERS, STEAM GENERATORS, DRYERS, & PROCESS HEATERS form with this application.
2. For Conveyorized Paint Systems, include the HP Rating of all electric motors associated with the system.

COATING INFORMATION

COATING	MANUFACTURER	TRADE NAME / I.D.#	MIX RATIO	VOC CONTENT OF EACH COMPONENT (lb/gal)	VOC CONTENT OF COATING AS APPLIED (lb/gal)	MAX USAGE IN ANY ONE DAY (gal)	MAX USAGE PER YEAR (gal)
Indicate Type of Coating next to number, such as: Topcoat, Primer, Basecoat, Clearcoat, Pretreatment Wash Primer, Extreme Performance, Specialty, etc. Motor Vehicle Refinishing: also specify if the coating is applied to Group I (I), Group II (II), or both (I,II)							
1.							
	Thinner/Reducer						
	Catalyst/Hardener						
2.							
	Thinner/Reducer						
	Catalyst/Hardener						
3.							
	Thinner/Reducer						
	Catalyst/Hardener						
4.							
	Thinner/Reducer						
	Catalyst/Hardener						
Cleanup Solvent							
Surface Preparation Solvent							

ADDITIONAL INFORMATION

1. Operating Schedule: _____ Hours per day _____ Days per week _____ Weeks per year.
2. Nearest Receptor: _____ Receptor Description _____ Distance from Stack to Receptor (ft) _____ Hours of Operation per Day (Optional)

Offsite Business ¹	
Sensitive Receptor ²	

- ¹ Examples of Offsite Businesses include, but are not limited to, office buildings, guard posts, and factories.
- ² Examples of Sensitive Receptors include, but are not limited to, schools, day care centers, hospitals, apartments, and other places of residence.
3. Is a rain cap present on exhaust stack? [] Yes [] No Direction of exhaust from device or structure: [] Vertical [] Horizontal
4. Facility Location: [] Urban (area of dense population) [] Rural (area of sparse population)
5. If more than 5 types of coatings are used, make additional copies of the COATING INFORMATION table above. For multiple colors of the same type of coating, provide coating information on the color with the highest VOC content.
6. Submit all Material Safety Data Sheets (MSDS) along with this form.

ATTACHMENT II

Permit to Operate
Standard Conditions

Nuisance:

1. {118} No air contaminant shall be released into the atmosphere which causes a public nuisance [District Rule 4102].

Rule 4606:

2. The owner/operator shall comply with the provisions of Rule 4406, Wood Products Coating operations. [District Rule 4606]
3. Records of types of coatings, and daily coating use, shall be maintained as specified in Rule 4606. [District Rule 4606]
4. Such records for the preceding 24 months shall be retained on site, and made available to District staff upon request. [District Rule 4606]
5. The annual Volatile organic compound (VOC) emissions from the facility shall not exceed XXXXX pounds per year. [District Rule 4606]