MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT
14306 Park Avenue Victorville, CA 92392-2310
760.245.1661 -- 800.635.4617 -- FAX 760.245.2022

AUTHORITY TO CONSTRUCT

P013656

If construction is not completed by the expiration date of this permit, it may be renewed for one additional year upon payment of applicable fees. Any additional extension will require the written approval of the Air Pollution Control Officer. This Authority to Construct may serve as a temporary Permit to Operate provided the APCO is given prior notice of intent to operate and the Permit to Operate is not specifically denied.

EXPIRES LAST DAY OF: NOVEMBER 2026

OWNER OF OPERATOR (Co.#2184)

Mag Bay Yachts
8650 Caliente Road
Oak Hills, CA 92344

EQUIPMENT LOCATION (Fac.#3985)

Mag Bay Yachts
8650 Caliente Road
Oak Hills, CA 92344

Description:
POLYURETHANE FOAM SPRAY GUN consisting of: GRACO Reactor A-25 PIN 262614 with Fusion AP Gun P/N 246101 (formally P012810). Facility elevation is 3696 feet above sea level.

CONDITIONS:

1. This equipment shall be installed, operated, and maintained in strict accord with those recommendations of the manufacturer/supplier and/or sound engineering principles in a manner consistent with good air pollution control practice for minimizing emissions. Unless otherwise noted, this equipment shall also be operated in accordance with all data and specifications submitted with the application for this permit.
[District Rule 204]

2. The VOC content of any coating used, transfer method, and record keeping requirements shall be in compliance with the following Requirements: District Rule 442-Usage of Solvents; District Rule 1106-Marine Coating Operations; District Rule 1114-Wood Products Coating Operations; District Rule-1115 Metal Parts & Products Coating Operations, and District Rule 1162-Polyester Resin Operations, as applicable.
[District Rule 1302]

Fee Schedule: 7 (c)	Rating: 1 device	SIC: 3089	SCC: 30800722	Location/UTM(Km): 462E/3807N

This permit does not authorize the emission of air contaminants in excess of those allowed by law, including Division 26 of the Health and Safety Code of the State of California and the Rules and Regulations of the District. This permit cannot be construed as permission to violate existing laws, ordinances, statutes or regulations of this or other governmental agencies. This permit must be renewed by the expiration date above. If billing for renewal fee required by Rule 301(c) is not received by expiration date above, please contact the District.

Mag Bay Yachts
8650 Caliente Road
Oak Hills, CA 92344

By: **COPY**
Brad Poiriez
Executive Director

UNOFFICIAL

3. The owner/operator shall keep MSDS sheets on site for all materials used at this facility, including MSDS for the materials used by this equipment, inclusive of 4, 4 Methylenediphenyl (MDI, CAS # 101-68-8) and Polymethylene polyphenyl isocyanate (PAPI, CAS # 9016-87-9). MSDS sheets shall be made available to the District upon request.
[District Rule 1302]

4. The total quantity of volatile organic compounds (VOCs) and/or organic solvents as defined in Rule 102 released to the atmosphere from this facility (and any adjoining facility under common ownership and belonging to the same industrial grouping) shall be less than 40,000 pounds (20.0 tons) per rolling twelve calendar month period. Increasing these facility limits may cause the combined emissions to designate this facility as a Synthetic Minor source.
[District Rules 204, 221, and 1303]

5. This facility is a designated a Toxic Area source; therefore, this facility shall be less than 8.0 tpy of a single HAP and less than 20.0 tpy of all HAPs. To ensure compliance, the owner/operator shall calculate and record the annual emissions of Federal Hazardous Air Pollutants (HAPs) in tons per year (tpy) on a calendar year basis (January 1 through December 31). The list of HAP's can be found in Section 112(b)(1) of the Federal Clean Air Act or at web site: http://www.epa.gOv/ttn/atw/188polls.html. This calculation shall be kept current, on-site for a minimum of two years, retained for 5 years, and be provided to District personnel on request. (NOTE: This calculation shall be expanded to cover all toxic substance's, used at this facility, which are included in Appendix A of Emission Inventory Criteria And Guidelines Report Criteria for the Air Toxics Hot Spots Program, adopted per the Air Toxics Hot Spots Information and Assessment Act (AB 2588, 1987, Connelly). The web site for Appendix A is: http://www.arb.ca.gov/ab2588/final96/guide96a.pdf. Violation of these HAP limits will make this source a Major Toxic Source; therefore, will be subject to 40 CFR 63, Subpart VVVV - National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing.
[District Rule 1302]

6. Total cobalt emissions from this facility shall be less than 2.57 pounds per year. To ensure that emissions remain below these thresholds, the following limits shall apply:
a) 0.3% cobalt in any coating, resin or gelcoat (verified by current SDS's); and,
b) 8,500 gallons per calendar year of cobalt containing coatings, resins and gelcoats.
[District Rule 204; District Rule 1303; District Rule 1320; District Rule 1520]

7. The owner/operator shall maintain a log for the facility, which, at a minimum, contains the information specified below. This log shall be maintained for a minimum five (5) years, and shall be provided to District, State, or Federal personnel on request:
a) Date of operation;
b) Manufacturer, type, and amount (in pounds or gallons) of resin, gelcoat, coating and solvent used (preparation, thinning, cleanup or other) and corresponding Safety Data Sheet (SDS);
c) VOC content of each type of resin, coating and solvent in pounds per gallon or grams per liter or percent (weight/weight);
d) Photochemically reactive organic solvent and organic solvent content of each type of resin, coating and solvent in pounds per gallon or grams per liter or percent (weight/weight);
e) Daily records of VOC containing material and/or organic solvents used;
f) Total amount of VOC and/or organic solvents used per calendar month;
g) Total amount of photochemically reactive organic solvents used per day;
h) Rolling 12-month tonnage of VOC emissions and HAP emissions;
i) Date of maintenance and filter replacements;
j) Differential pressure reading when in operation;
k) List of coatings which contain Cobalt compounds and the total concentration; and
l) Number of hours per calendar year of heater operation.
[District Rule 1162]

8. This facility shall comply with these permit conditions, District Rules 442, 1106, 1114, 1115, and 1162; in the event of conflict, the more stringent requirement(s) shall govern.
[District Rule 1302 and 1303]

9. The volumetric limits of foam produced by this equipment are 45,000 cubic feet per year. This limit is based on the health risk associated with the operation of this equipment. To ensure compliance, the owner/operator shall maintain records of the volume displaced by the foam created by this equipment. The owner/operator shall; therefore, record the volume of foam created whenever the device is used, documenting the daily, monthly, and yearly totals so as to preclude exceeding the 45,000 cubic foot per year calendar

limit. Records of the foam volume created must be kept on site for a minimum of two years, retained for 5 years, and be provided to District personnel on request.
[District Rule 1320]

10. Reactions of 4, 4 Methylenediphenyl (MDI, CAS # 101-68-8) and polymethylene polyphenyl isocyanate (PAPI, CAS # 9016-87-9) result in a near 100% consumption of the reactants into forming polyurethane foam; however, a small residual amount has been analytically determined by Chemline, the chemical supplier. A further refinement of that analysis results with an emission factor of 10.3 pounds of MDI per 45,000 cubic foot of foam. This further reduces to 2.289 X 10^-4 pounds of MDI (also a VOC) per cubic foot of foam. This is the emissions factor that the facility shall use to quantify their VOC and MDI emissions from this equipment, or until new information shows otherwise.
[District Rule 1320]

11. The only reactants that shall be used in this device are:
a) 4, 4 Methylenediphenyl diisocyanate (MDI, CAS # 101-68-8), and;
b) Polymethylene polyphenyl isocyanate (PAPI, CAS # 9016-87-9).

These reactants must be used in the proper proportions such that near 100% reaction of polyurethane occurs at the equipment nozzle gun.

Compliance shall be demonstrated by keeping records of documentation by the chemical supplier that indicates the proper proportions and specific equipment options, such as proportionizers on the Reactor that match up with the proportions required.

The documentation and equipment specifics shall be demonstrated to the satisfaction of District, State, or Federal personal upon request.
[District Rule 1320]

12. The chemical compounds, 4, 4 Methylenediphenyl diisocyanate (MDI, CAS # 101-68-8) and polymethylene polyphenyl isocyanate (PAPI, CAS # 9016-87-9) have acute toxicity properties, and as such, the owner/operator shall exercise caution in the handling of these materials, including but not limited to the following:
a) The owner/operator shall keep the manufacturer's supplied containers sealed and air tight except during transfer to this device, and;
b) The owner/operator shall ensure that the containers are resealed immediately after material transfer has occurred so as to minimized VOC and toxic/HAP emissions to the greatest extent possible.
[District Rule 1320]

13. A facility wide Comprehensive Emission Inventory (CEI) for all emitted criteria and toxic air pollutants must be submitted to the District, in a format approved by the District, upon District request.
[District Rule 107(b), Health & Safety Code 39607 & 44341-44342, 17 CCR 93400 et seq., and 40 CFR 51, Subpart A]