



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

P013702

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: JULY 2026

OWNER OF OPERATOR (Co. #1576)

Daniel Company LLC
2185 E 7th Street
Los Angeles, CA 90023

EQUIPMENT LOCATION (Fac. #2667)

Daniel Company - Adelanto
9972 Rancho Rd
Adelanto, CA 92301

Description:

ASSEMBLY BUILDING consisting of: Assembly Building Polyester Resin Operations, including one (1) 25' x 4' x 4.5' Filament winding process area, utilizing in-house manufactured pipe mandrel, one (1) Magnum Venus Products Model FIT-C-CMB-UPS-11 chopper gun and hand layup manual resin and gelcoat application.

EQUIPMENT

Capacity	Equipment Description
1	Magnum Venus Products Model FIT-C-CMB-UPS-11 chopper gun
1	25' x 4' x 4.5' Pipe Mandrel (Filament winding application--1 hp motor associated)

CONDITIONS:

1. This equipment shall be installed, operated and maintained in strict accordance with those recommendations of the manufacturer/supplier and/or sound engineering principles which produce the minimum emissions of contaminants. Unless otherwise noted, this equipment shall also be operated in accordance with all data and specifications submitted with the application(s) for this permit. The facility shall notify the District of any operational changes (including but not limited to the addition of extra shifts or production increases) from those identified in the applications prior to implementation.

[District Rule 1302(C)(2)(a)]

[40 CFR 70.6 (a)(3)(B)]

Fee Schedule: 7 (c)

Rating: 1 device

SIC: 3089

SCC: 30800720

Location/UTM(Km): 459E/3826N

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.

Daniel Company LLC
1939 W. 11th Street, Suite #E
Upland, CA 91786

By: **COPY**
Brad Poiriez
Air Pollution Control Officer

2.This facility shall be operated and maintained in compliance with all applicable District Rules, including but not limited to, District Rule 442 - Usage of Solvents, and 1162 - Polyester Resin Operations.
[District Rules 204, 442 and 1162]

3.All application of resins shall be limited to one of the following methods:

- a. Non-atomizing spray;
 - b. Flow coaters;
 - c. Manual application; or
 - d. Other non-atomizing techniques which have transfer efficiencies at least equal to one of the above methods
- [District Rule 1162(C)(2)(a)]

4.All application of gel coats shall be limited to one of the following methods:

- a. Air-Assisted Airless Spray;
 - b. Electrostatic Attraction;
 - c. High volume, Low Pressure (HVLP) Spray; or
 - d. A non-atomizing technique listed in District Rule 1162(C)(2)(a)
- [District Rule 1162(C)(2)(b)]

5.Monomer content for all corrosion resistant resins applied shall not exceed 46% by weight.
[District Rule 1303 - basis: BACT]

6.This facility shall only use gel coats, resins and other materials that comply with the VOC limits in Table 1 to District Rule 1162. In addition to complying with the Table 1 limits, the non-Monomer VOC content shall not exceed more than 5% by weight of the resin or gel coat.
[District Rule 1162(C)(1)(a)]

7.Facility wide HAP and VOC Emissions shall be calculated on a monthly basis using the equations in Table 1 of Title 40 CFR 63 Subpart WWWW.
[District Rules 1162 and 1303, Table 1 to 40 CFR 63, Subpart WWWW]

8.The facility shall not emit more than a combined total of 47,000 pounds of all HAPs combined, nor more than a combined total of 47,000 pounds of all VOCs combined from all sources as calculated on a twelve (12) month rolling sum basis. Compliance shall be verified on a monthly calendar basis by reviewing the facility's VOC/Styrene/MMA emissions tracking system, which shall contain, at a minimum, the following information:

- a. Method of application and type of substrate for each use;
- b. Manufacturer, type, and amount (in pounds, gallons, etc.) of all resins, coatings and solvents used (preparation, production, thinning, cleanup or other);
- c. VOC and HAP(s) content of each type of resin, gel coat, coating and solvent in pounds per gallon, grams per liter, percent (weight/weight), etc.;
- d. The monthly VOC, Styrene, MMA, and all other HAP emissions from all sources;
- e. Records of the monthly production rates and other operational data used to determine monthly VOC, Styrene, MMA, and all other HAP emissions;
- f. Verification that the total combined HAP emissions during the rolling twelve (12) month period is below the 47,000 pound limit;
- g. Verification that the total VOC emissions during the rolling twelve (12) month period is below the 47,000 pound limit; and
- h. Records of fluid tip pressure calibrations as specified by the spray gun manufacturer (not applicable for non-spray application methods).

These records shall be retained on-site for a minimum period of five (5) years and be made available for review at any time by District, State or Federal personnel.Exceeding this facility cap limit will trigger offsets and BACT review.
[District Rules 1162, 1203, 1301 and 1303 and 40 CFR 70.6 (a)(3)(B)]

9.This facility must not use cleaning solvents that contain HAPs, except that styrene may be used as a cleaner in closed systems, and organic HAP containing cleaners may be used to clean cured resin from application equipment. Application equipment includes any

equipment that directly contacts resin. Furthermore, this facility shall not use cleaning solvents that contain VOCs, excluding mold sealing and release agents, mold stripping and cleaning, cleaners used to clean cured resin from Application Equipment, and closed systems, unless:

- a. The VOC content composite partial pressure is 45 mm Hg or less at a temperature of 20 degrees C; or
- b. The material contains 25 grams or less of VOC content per liter of material, as applied.

[40 CFR 63, Subpart WWWW and District Rule 1162(C)(6)]

10. The polyester resin operations buildings (Assembly Building, Chop & Valve Building, Tank & Pipe Building), spray booth and the entire facility shall be maintained and operated in compliance with USEPA NESHAP Maximum Achievable Control Technology (MACT) Standards found in 40 CFR 63 Subparts A and WWWW to include but not limited to the following:

- a. The open molding HAP emissions shall not exceed the HAP emission limits in Table 3 or Table 7, depending on which compliance option is chosen to demonstrate compliance with Subpart WWWW of 40 CFR 63. In accordance with Subpart 63.5810, the facility will use Option C in 63.5810(c) to comply with the open molding limits.
 - (i) In the event that the facility wants to use a different compliance option as allowed for under 63.5810, an application to modify the permit must be submitted and approved prior to implementing the change in compliance options.
- b. HAP emissions (commonly styrene and methyl methacrylate) shall be determined by using the equations found in Table 1 of Subpart WWWW to 40 CFR 63.

c. This facility must comply with Work Practices found in Table 4 to Subpart WWWW of 40 CFR 63 and demonstrate compliance with these Work Practices per Table 9 to Subpart WWWW of 40 CFR 63.

d. This facility must submit semi-annual Compliance Reports as required in Table 14 to Subpart WWWW of 40 CFR 63 per 40 CFR 63.5910(b). The report must contain include all information as required under 40 CFR 63.5910, and may be submitted along with, or as part of, the semiannual monitoring report required by this facility's Federal Operating Permit, per 40 CFR 70.6(a)(3)(iii)(A).

// Semi-Annual Report // Reporting Period // Due Date // Submit to

MACT: Semiannual monitoring (40 CFR 63, WWWW) // January 1 - June 30 // July 31 // MDAQMD

Title V: Semiannual monitoring (40 CFR 70.6) // January 1 - June 30 // July 31 // MDAQMD & US EPA

MACT: Semiannual monitoring (40 CFR 63, WWWW) // July 1 - December 31 // January 31 // MDAQMD

Title V: Semiannual monitoring (40 CFR 70.6) // July 1 - December 31 // January 31 // MDAQMD & US EPA

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- e. This facility is required to meet operation and maintenance requirements per 40 CFR 63.6(e).
 - f. This facility must submit a Notification of Compliance Status per 40 CFR 63.9(h) and Table 13 to Subpart WWWW of 40 CFR 63.
 - g. In the event of conflict between the MACT Standard and these permit conditions, the more stringent standard shall govern.
- [40 CFR 63, Subpart WWWW, 40 CFR 70.6(a)(3)(iii)(A) and District Rule 1162]

11. For the purposes of calculating VOC emissions, all VOC in air dried materials used shall be assumed to be emitted to the atmosphere during the day of application.

[District Rules 442, 1162, 1302 and 1520]

12. This facility must keep containers that store VOC and/or HAP-containing materials closed or covered except during the addition or removal of materials. Bulk VOC and/or HAP-containing material storage tanks may be vented as necessary for safety.

[40 CFR 63, Subpart WWWW and District Rule 1162(C)(5)]

13. This facility must use mixer covers with no visible gaps present in the mixer covers, except that gaps of up to 1 inch are permissible around mixer shafts and any required instrumentation. Containers of 5 gallons or less may be open when active mixing is taking place, or during periods when they are in process (i.e., they are actively being used to apply resin).

[40 CFR 63, Subpart WWWW and District Rule 1162(C)(5)]

14. Each chopper gun shall be uniquely marked for ease of identification by District personnel.

[District Rule 204]

15. Any Magnum Venus Products Model FIT-C-CMB-UPS-11 chopper gun may be used within this building and interchangeably throughout this facility, but all active guns must operate under an active P-type permit.

[District Rule 204]

16. In the event of a malfunction of any emissions related part of this operation, the process line must be shut down as soon as safely

possible and shall not be restarted until all malfunctions have been corrected. Equipment breakdowns shall be reported to the District in accordance with District Rule 430.

[40 CFR 63.6 and District Rules 430 and 1302]

17.The facility shall not discharge VOCs into the atmosphere from all VOC containing materials, Emissions Units, equipment or processes that are not subject to District Rule 1162, in excess of 1190 pounds per month. This includes, but is not limited to, coatings, modifiers, sealants, release agents, polymerization initiators, pure monomers, and catalysts.

[District Rule 442 (C)(1)]

18.A facility wide Comprehensive Emission Inventory (CEI) Plan and Report 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), H&S Code 39607 & 44341-44342 and 40 CFR 51, Subpart A]