



## MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT

14306 Park Avenue Victorville, CA 92392-2310  
760.245.1661 -- 800.635.4617 -- FAX 760.245.2022

**INACTIVE**

P012810

Inactive type Permit has no description information.

**EXPIRES LAST DAY OF: APRIL 2020**

### **OWNER OF OPERATOR (Co.#2184)**

Mag Bay Yachts  
8650 Caliente Road  
Oak Hills, CA 92344

### **EQUIPMENT LOCATION (Fac.#3066)**

Mag Bay Yachts - Adelanto  
9424 Cassia Road  
Adelanto, CA 92301

#### **Description:**

POLYURETHANE FOAM SPRAY GUN consisting of: GRACO Reactor A-25 P/N 262614 with Fusion AP Gun Part Number 246101. The fitted 2:1 transfer pumps for foam component "A" is P/N 256200, S/N A024537 and foam component "B" is P/N 256200 S/N A024538. The Fusion AP Gun is identified as an AP-C17A AZ 67024. Equipment sprays material containing Methylenediphenyl diisocyanate (MDI) a listed Hazardous Air Pollutant under 42 U.S.C. 7412 (b). (Federal Clean Air Act) and AB 2588 Appendix A-1.

#### **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 1302(C)(2)(a)]

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

[District Rule 204]

Fee Schedule: 7 (i)

Rating: 1 device

SIC: 3089

SCC: 30800720

Location/UTM(Km): 458E/3823N

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**  
Air Pollution Control Officer

3.This facility is a designated as a Synthetic Minor 80 source (SM-80); therefore, the total quantity of volatile organic compounds (VOC), and/or organic solvents as defined in District Rule 102, released to the atmosphere from this facility (and any adjoining facility under common ownership and belonging to the same industrial grouping) shall not exceed 49,800 pounds (24.9 tons) per rolling twelve calendar month period. Increasing this facility limit requires an application to modify this permit and will make the combined facility a Federally Major (Title V) source which will trigger offsets and BACT review.  
[District Rules 204, 221, and 1303]

4.This facility is a designated as a Synthetic Minor 80 source (SM-80); therefore, this facility shall not emit more than 9.9 tpy of a single HAP and/or 24.9 tpy of any combined HAP. To ensure compliance, the owner/operator shall calculate and record the annual emissions of Federal Hazardous Air Pollutants (HAP) 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>.  
[District Rule 1302]

5.The only reactants that shall be used in this device are:  
(a) 4, 4 Methylene diphenyl 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]

6.The chemical compounds, 4, 4 Methylene diphenyl 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]

7.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 Methylene diphenyl (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]

8.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]

9.Reactions of 4, 4 Methylene diphenyl (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  $2.289 \times 10^{-4}$  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]

10.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), H&S Code 39607 & 44341-44342, and 40 CFR 51, Subpart A]