MOJAVE DESERT
AIR QUALITY MANAGEMENT DISTRICT

FOP Evaluation Document

Preliminary Determination/Decision - Statement of Basis

for

Renewal and Significant Modification of and NSR Modification to

FOP Number: 121902118

For:

Unlimited Performance Products

Facility:

Unlimited Performance Products

Facility Address:

8770 Caliente Road
Hesperia, CA 92345

Document Date: **November 18, 2024**
Submittal date to EPA/CARB for review: **November 19, 2024**
EPA/CARB 45-day Commenting Period ends: **January 3, 2025**
Public Notice Posted: **November 21, 2024**
Public Commenting Period ends: **December 21, 2024**
Permit Issue date: On or about **January 10, 2025**

Permitting Engineer:
Kent Christensen

A. FACILITY IDENTIFYING INFORMATION:

Owner/Company Name:	Unlimited Performance Products
Facility Names:	Unlimited Performance Products
Facility Location:	8770 Caliente Road Hesperia, CA 92345
Mailing Address:	8770 Caliente Road Hesperia, CA 92345
Federal Operating Permit Number:	121902118
MDAQMD Company Number:	1219
MDAQMD Facility Number:	2118
Responsible Official:	Nick Adams Owner O: 760-948-0055 F: 760-947-8333 E: Net55@aol.com
Facility "Site" Contact(s):	Nick Adams Owner O: 760-948-0055 F: 760-947-8333 E: Net55@aol.com
Nature of Business:	Fiberglass Automobile Parts Manufacturer Fiberglass Composite Boat Manufacturer
SIC/NAICS Code:	3714/336390 – Fiberglass Automobile Parts 3732/336612 – Boat Building and Repairing
Facility Coordinates	UTM (Km) 462.801-E/3807.788-N 34.41065 degrees Latitude, -117.400515 degrees Longitude

B. Introduction:

1. Description of Facility

Unlimited Performance Products (UPP), Federal Operating Permit (FOP) number 121902118, located at 8770 Caliente Road, Hesperia, CA 92345, specializes in reinforced plastic composites, manufacturing both aftermarket automotive parts and boat manufacturing. A description of each process follows:

> *For automotive parts manufacturing*: A fiberglass mold of the automobile part is sprayed with a mixture of gel coat and catalyst using a spray gun in the spray booth. The gel coat then hardens at ambient temperature. Next, hand lay-up of fiberglass and polyester resin is carried out in the fiberglass lay-up room. Polyester resin is applied by brush in the hand lay-up operation.
>
> *For boats manufacturing*: A fiberglass mold of a boat component is sprayed with a mixture of gel coat and catalyst using a spray gun. After the gel coat is hardened, vinyl ester or polyester ester resin is applied by wet-out guns or hand lay-up as laminations layers. After the lamination layers cure, boat components are then assembled into boat sections using adhesive and resin applications. These boat sections are further integrated to form the actual boat. The boat is then worked on to increase its aesthetic value followed by quality control/quality assurance. Finally, the boat is shipped to customers.

2. Description of Permitting Actions

The Mojave Desert Air Quality Management District (MDAQMD or District) received an application for renewal of this Federal Operating Permit on 4/30/2024. Additionally, simultaneously with the renewal application the District received an application on 3/26/24 for a new Portable Spray Gun for Fiberglass Gel Coat Operations.

Pursuant to District Rule 1301 – *New Source Review Definitions*, UPP is a minor facility. The addition of a new Portable Spray Gun for Fiberglass Gel Coat Operations is considered a Modification under NSR. This document serves as the Preliminary Decision under District Regulation XIII – *New Source Review*.

Furthermore, UPP is defined as a federal Major Facility pursuant to District Rule 1201 – *Federal Operating Permit Definitions*, because it has a Potential to Emit (PTE) greater than ten tons per year of a single Hazardous Air Pollutant (HAP) – styrene. Under Regulation XII – *Federal Operating Permits*, this proposed permitting action is considered both a Renewal of the Federal Operating Permit and a Significant Modification to the Federal Operating Permit for the addition of the new Portable Spray Gun. This document serves as the Preliminary Decision under District Regulation XII – *Federal Operating Permits*.

The Federal Clean Air Act Amendments of 1990 established a nation-wide permit to operate program commonly known as "Title V". The MDAQMD adopted Regulation XII [Rules 1200 - 1210] and Rule 221 - *Federal Operating Permit Requirement*; [Version in SIP = Current, 40

CFR 52.220(c)(216)(i)(A)(2) - 02/05/96 61 FR 4217], to implement both the Federal Operating Permit and Acid Rain Permit programs locally and have received Final Program Approval from EPA on March 6, 1996.

This facility (Unlimited Performance Products, hereafter UPP) is subject to the Operating Permit requirements of Title V of the federal Clean Air Act, Part 70 of Title 40 of the Code of Federal Regulations (CFR), and MDAQMD Regulation XII, *Federal Operating Permits*.

Pursuant to Regulation XII, *Federal Operating Permits*, the District has reviewed the terms and conditions of this Federal Operating Permit and determined that they are still valid and correct. This review included an analysis of federal, state, and local applicability determinations for all sources, including those that have been modified or permitted since the issuance of the initial Federal Operating Permit. The review also included an assessment of all monitoring in the permit for sufficiency to determine compliance. This *Statement of Legal and Factual Basis,* pursuant to Rule 1203(B)(1)(a)(i), is intended to assess the adequacy of the existing Title V Permit and explain the District's basis in composing the proposed Renewal.

In the MDAQMD, state and District requirements are also applicable requirements and are included in the permit. These requirements can be federally enforceable or non-federally enforceable. State and District only applicable requirements are designated as such.

C. New Source Review Analysis

1. Determination of Emissions – District Rule 1302(C)(1)

The proposed spray gun equipment at UPP has the potential for emissions of criteria and toxic pollutants. Emission calculations are provided below:

Potential to emit is based on the manufacturer's stated gel coat throughput capacity of 8 pounds per minute, using the gel coat variety with maximum VOC content, calculated using the methodologies required in 40 CFR 63 Subpart VVVV – Boat Manufacturing NESHAP and 40 CFR 63 Subpart WWWW – Reinforced Plastic Composites Production NESHAP. The resulting sum of throughputs is then subjected to the facility permit limit of 24.9 tons per year VOC to determine the emission limits for individual constituents. A production schedule resulting in these emission rates, based on the manufacturer's reported throughput capacity, was computed to represent the maximum operation hours that would result in staying below the facility emission limit using these assumptions.

Variable	Description	Numeric Value	Units	Data Source
Q_i	Annual throughput of gel coat	176.400	Tons/year	1
h	Hours of operation	3 5 49	Hrs/day Days/week Weeks/year	

		735	Hrs/year	
EF_i	Subpart WWWW Emission Factor	See Subpart WWWW Table 1	Lbs HAP/Ton gelcoat throughput	2
HAP_i	Subpart WWWW Annual HAP Emissions (Uncontrolled)	See Table Below	Lbs/Year	2
$\%HAP_i$	Gel Coat HAP content RP Pigmented Orca Clear White Reflex	 37 42.4 33	Wt. %	3
M_i	Mass of resin used	See table below	Mg	4
PV_i	Weighted Average MACT model point value		Kg/Mg	4
x_i	Ratio of resin throughput to total throughput	See table below	Wt. %	

[1] GS Manufacturing, LW05 Gelcoat Systems Spec. Sheet
[2] 40 CFR 63.5799, Table 1 to 40 CFR 63 Subpart WWWW
[3] Gel Coat SDS
[4] 40 CFR 653.7510, equations 1 and 2

Equations:

1) $HAP_i = EF_i * Q_i$ (40 CFR Subpart WWWW)
2) $EF_i = 0.169 * \%HAP_i * 2000$ (for % HAP_ii <33%)
3) $EF_i = ((0.714 * \%HAP_i) - 0.18) * 2000$ (for $\%HAP_i \geq 33\%$)
4) $x_i = \frac{Q_t}{\sum_{t=1}^{n} Q_t}$
5) $HAP_i = [(PV_R)(M_R)+(PV_{PG})(M_{PG})+(PV_{CG})(M_{CG})+(PV_{TR})(M_{TR})+(PV_{TG})(M_{TG})]$ (Subpart VVVV, 40 CFR 63.5710 *Eq. 1*)
6) $PV_{QP} = \frac{\sum_{i=1}^{n}(M_i PV_i)}{\sum_{i=1}^{n}(M_i)}$ (40 CFR 63.5710 Eq.2) Subpart VVVV

Assuming a basis of 735 hours per year, a maximum throughput rate of 8 pounds gel coat per minute, maximum VOC/HAP content gel coat (based on each material being the exclusive material in use, and Orca Guard Gel Coat is the high HAP content gel coat in use), the expected potential emissions for this Permit unit are calculated using 40 CFR Subpart WWWW emissions calculation equations. Potential Emissions are as follows:

Resin	Q_i (TPY)	EF_i (lbs/ton)	$\%HAP_i$ (Wt. %)	HAP_i (lbs/yr.)
Production Resins	No resins are applied using this equipment			
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Gel Coats				
RP Pigmented Gel Coat	176.4	241.46	37	41,472
Orca Guard Gel Coat	176.4	**281.11**	**42.4**	**49,588**
White Reflex Gel Coat	176.4	196.40	33	34,644

Assuming the same maximum throughput as used for Subpart WWWW calculations above for materials used in the manufacture of boats (based on each material being the exclusive material in use), the expected potential emissions for this Permit unit, calculated using 40 CFR Subpart VVVV Emissions Averaging equations, are as follows:

Resin	**M_i, Mg**	**PV_i, kg/Mg**	**x_i, wt. %**	***HAP_i, lbs/yr.***
Production Resins	No resins are applied using this equipment			
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Gel Coats				
Orca Guard Gel Coat	160.03	2.109	100	372
White Reflex Gel Coat	160.03	2.358	100	416

In addition to volatile HAP content (styrene, methyl methacrylate), the RP Pigmented Gel Coat contains a non-volatile HAP (cobalt bis(2-ethylhexanoate)), which presents a significant health risk to exposed residential and offsite workplace receptors (refer to Section 5.a - Determination of Requirements for Toxic Air Contaminants – State T-NSR below). Facility emissions of cobalt bis(2-ethylhexanoate) is limited to 2.8 pounds per year. A PTE of 2.8 pounds of cobalt bis(2-ethylhexoanate) per year is calculated to result from a throughput of 7923 gallons RP Pigmented Gel Coat per year, or an average throughput of 660 gallons per month.

a. Emissions Change

Pursuant to District Rule 1304(B), the Emission Change is calculated as follows:

Emissions Change = Proposed emissions (PE) – Historic Actual Emissions (HAE)

For this project, HAE = zero because this permit is a new unit, so Emissions Change = Net Emissions Increase = PE

The Emissions Change for HAPs is equal to the PE for the unit, as described in Sect C.1 above. There is no emission change for VOC as this facility has a Federally enforceable emission limitation of 24.9 tons per year, which is not changing.

2. Determination of Nonattainment NSR Requirements

a. BACT Evaluation – District Rule 1302(C)(2)(a)

Best Available Control Technology (BACT) is required for each new Permit Unit at a Facility that emits, or has the Potential to Emit (PTE) Nonattainment air pollutants in amounts greater than or equal to: twenty-five (25) pounds per day or more (District Rule 1303(A)(1)). For purposes of determining applicability of BACT, PTE is calculated pursuant to the provisions of District Rule 1304(D)(3). UPP has a unit PTE for the proposed unit in excess of twenty-five (25) pounds per day for the Nonattainment Pollutant VOC; therefore, the proposed new Permit Unit must be equipped with BACT pursuant to District Rule 1303(A). BACT is defined as the most stringent emission limit or control technique which has been achieved in practice for such Permit Unit class or category of source; or, any other emission limitation or control technique demonstrated in practice to be technologically feasible and cost effective by the APCO or by CARB. [District Rule 1301].

BACT determinations for the proposed equipment class and category were reviewed from several agencies (local, state, and federal). Based on a comparison of these existing BACT determinations and state and federal regulations, the District has determined that compliance with the Reinforced Plastic Composites Production NESHAP (40 CFR 63 Subpart WWWW), Boat Manufacturing NESHAP (40 CFR 63 Subpart VVVV), and District Rule 1162 meet or exceeds the BACT Determinations for this new unit. BACT for this unit is for VOC, and this facility is a Minor source for VOC.

Bay Area AQMD (BAAQMD) and San Joaquin Valley APCD (SJVAPCD) have established BACT determinations for VOC BACT 'Achieved In Practice' based on maximum monomer limits for resins and gel coats used in Polyester Resin Operations. The monomer content limits listed in applicable BAAQMD, SJVAPCD, MDAQMD, and Subpart VVVV regulations are essentially equivalent with each other, therefore the District has determined that compliance with these regulations is BACT. A summary of the BACT analysis is provided in the following table:

Data Source	Regulation	Gel Coat	Applicable NESHAP	Monomer Content Limit	Notes
BAAQMD	Reg. 8, Rule 50	White	WWWW	30%	3, 6
			VVVV	33%	
		Non-white pigmented	WWWW	37%	
			VVVV	33%	
		Clear	WWWW	44%	
		Clear	VVVV	48%	
SJVAPCD	Rule 4684	White	WWWW	30%	4, 7
		Non-white pigmented	WWWW	37%	
		Pigmented	VVVV	33%	

		Clear	WWWW	44%	
		Clear	VVVV	48%	
MDAQMD	Rule 1162	White	WWWW	30%	1
			VVVV	33%	
		Non-white pigmented	WWWW	37%	
			VVVV	33%	
		Clear	WWWW	44%	
			VVVV	48%	
Subpart VVVV		Pigmented		33%	2
		Clear		48%	
Proposed Permit Action		White	VVVV	33%	8
		Non-white pigmented	WWWW	37%	9
		Clear	WWWW, VVVV	42.4%	10

[1] MDAQMD Rule 1162
[2] 40 CFR 63 Subpart VVVV - Table 2; Section 63.5704 - Emissions Averaging Option.
[3] Bay Area AQMD BACT Determinations, Polyester Resin Operations – Hand and Spray Layup. Document #129.2.1, 9/27/2006.
[4] San Joaquin Valley APCD BACT Determination, Fiberglass Boat Manufacturing.
[5] 40 CFR 63 Subpart WWWW – Table 3; Item 6 – Open molding – gel coat HAP emission limits.
[6] BAAQMD Reg. 8 Rule 50, Section 302: . Spray application using HVLP with open mold operations is compliant with the regulation for these limits.
[7] SJVAPCD Rule 4684 Section 5.1.2: Spray application using HVLP with open mold operations is compliant with the regulation for these limits.
[8] HK Research, White Reflex RFX2900 Gel Coat SDS
[9] Lilly Ram, Various Colors Gelcoat SDS
[10] Orca Composites, Orca Guard Gel, Clear Gel Coat SDS

3. Offsets Evaluation – District Rule 1302(C)(3)

Offsets are required for new or Modified Facility which emits or has the Potential to Emit a Regulated Air Pollutant in an amount greater than or equal to the offset threshold amounts of Nonattainment Air Pollutants and their Precursors specified in District Rule 1303(B). The facility is located in Federal Ozone Nonattainment Areas, but the facility PTE and the Net Emissions Increase from this Modification do not exceed 25 tons per year of any Nonattainment Air Pollutant and/or their Precursors, as UPP has a federally enforceable VOC emission limit not to exceed 24.9 tons per year; therefore, offsets are not required. There are no HAP offset thresholds.

4. Stack Height Analysis – District Rule 1302(C)(4)

District Rule 1302(B)(1)(a)(i) requires that the applicant submit a determination of whether stack height exceeds Good Engineering Practice (GEP). The stack heights for the new emission units do not exceed GEP per USEPA Regulation 62.7 (limits credit for stack height) and 40 CFR 51.100(ii); therefore, a stack height analysis is not required.

5. Determination of Requirements for Toxic Air Contaminants – District Rule 1302(C)(5)

Pursuant to District Rule 1320 – New Source Review for Toxic Air Contaminants, UPP is subject to both State and Federal New Source Review, as UPP is a Modified Facility (or Emission Units) which has the potential to emit a Toxic Air Contaminant. In addition, the new unit is subject to the National Emission Standards for Hazardous Air Pollutants for Boat Manufacturing (40 CFR 63 Subpart VVVV) and 40 CFR 63 Subpart WWWW – Reinforced Plastic Composites Production NESHAP. Pursuant to the requirements of District Rule 1320, an applicability analysis of state and federal air toxic regulations was conducted for the proposed equipment (State T-NSR and Federal T-NSR, respectively). The State T-NSR and Federal T-NSR analyses are described below:

a. State T-NSR

District Rule 1320(E)(1)(b) requires that requirements from any applicable ATCM be added to the District permit. No ATCM applies to this facility.

Pursuant to District Rule 1320 (E)(2), State T-NSR also requires an Emission Unit Prioritization Score. This section requires prioritization scores to be calculated using the most recently approved CAPCOA Facility Prioritization Guidelines, the most recently approved OEHHA Unit Risk Factors for cancer potency and Reference Exposure Levels for non-cancer acute and chronic factors. The Emission Unit Prioritization Score calculation is consistent with the 2016 CAPCOA Facility Prioritization Guidelines.

PTE for the new unit under District Permit P015080 is calculated using emissions data obtained from manufacturer data, coupled with assumptions for operating throughput limits maintaining compliance with permit limits on Facility emissions of VOCs. Unit emissions result from spray application of gel coat materials, and consist primarily of styrene and methyl methacrylate, with small amounts of cobalt bis(2-ethylhexanoate) contributed from one gel coat, RP Pigmented Gel Coat. Facility emissions include similar emissions from another spray booth for gel coats, and similar emissions from hand layup of resins.

HAP emissions include volatile HAPs (styrene and methyl methacrylate), which are VOCs. In addition, small quantities of particulate HAP emissions of cobalt bis(2-ethylhexoanate) result from one gel coat. PTE for the particulate HAPs is adjusted to limit the Facility PS to less than “High Priority”, and permit conditions are added to limit Facility emissions of cobalt bis(2-ethylhexoanate) to less than 2.8 pounds per year, by enforcing a rolling twelve month average of 0.233 pounds per month.

Prioritization scores (PS) for the new unit were calculated using the closest workplace receptor located at a distance of 48 m (measured to the property line), at a heading of 180 degrees, and closest residential receptor estimated at a distance of 404 m from the facility, at a heading of 276 degrees.

At these distances, based on the Unit PTE, the calculation produced a maximum PS of 0.7107 for the nearest residential receptor and 4.6463 for nearest offsite workplace receptor, evaluated with the District default workplace exposure adjustment. PS calculations based on the Facility PTE are 1.4730 and 9.6296 for residential and workplace receptors, respectively. In each case, the Cancer PS is entirely due to particulate HAP emissions, and non-cancer PS is entirely due to volatile HAP emissions. These Prioritization Scores greater than one (1) result in this emissions unit and Facility being categorized as an "Intermediate Priority"; pursuant to District Rule 1320 (E)(2)(b), no further State T-NSR action is required.

b. Federal T-NSR

Pursuant to District Rule 1320(F)(1), the Modified Facility/Emission Unit P015080 was analyzed to determine if any current, enforceable Maximum Achievable Control Technology (MACT) standards apply to the equipment affected by this permitting action, and if so to ensure that those requirements are enforced by permit condition. The proposed new unit is subject to the Boat Manufacturing NESHAP (40 CFR 63 Subpart VVVV) and Reinforced Plastic Composites Production NESHAP (40 CFR 63 Subpart WWWW), and applicable requirements are added as permit conditions.

c. District Rule 1520 – Toxic Hot Spots Analysis

District Rule 1520 – Control of Toxic Air Contaminants from Existing Sources applies to UPP, as they are an existing facility with a PTE to emit TAC (Section (B)(1)(a) and (c)). The most recently approved (2022 emission year) Comprehensive Emission Inventory Report (CEIR) for UPP, in conjunction with PTE for the proposed unit evaluated in this permitting action, was utilized to fulfill the requirements of section (D)(1)(b)(i) of District Rule 1520.

Section (E)(1)(a)(ii) requires prioritization scores to be calculated utilizing the most recently approved CAPCOA Facility Prioritization Guidelines, the most recently approved OEHHA Unit Risk Factor for cancer potency factors, and the most recently approved OEHHA Reference Exposure Levels for non-cancer acute factors, and non-cancer chronic factors. Therefore, Facility Prioritization Scores were calculated using the 2016 CAPCOA Facility Prioritization Guidelines, and account for recent updates to the OEHHA's Risk Assessment Guidance Document.

Prioritization scores (PS) for the new unit were calculated using the closest workplace receptor located at a distance of 48 m (measured to the property line), at a heading of 180 degrees, and closest residential receptor estimated at a distance of 404 m from the facility, at a heading of 276 degrees.

At these distances, based on the PTE for this unit, and facility actual emissions (2023 CEIR data) for other processes, the calculation produced a maximum PS of 0.7107 for the nearest residential receptor and 4.6463 for nearest offsite workplace receptor, evaluated with the District default workplace exposure adjustment. PS calculations based on the Facility PTE are 1.4730 and 9.6296 for residential and workplace receptors, respectively. In each case, the Cancer PS is entirely due to particulate HAP emissions, and non-cancer PS is entirely due to volatile HAP emissions. These Prioritization Scores are greater than one (1) result in this emissions unit and Facility being categorized as an "Intermediate Priority"; pursuant to District Rule 1520, section (E)(1)(c), no further analysis is required. UPP's toxic emissions are routinely tracked and analyzed to ensure compliance with District Rule 1520 on an annual basis as part of the District's emissions inventory and Hot Spots Program.

6. Determination of Requirements for Prevention of Significant Deterioration – District Rule 1302(C)(6)

   a. PSD Analysis

   Per the language in the applicability procedures of 40 CFR 52.21 (a)(2)(i) and (ii), PSD applies to "any new major stationary source or the major modification of any existing major stationary source". The proposed modifications will not result in a general emission change (increased emissions) in excess of 25 tons per year of VOC because of the 24.9 ton per year facility permit limit, and therefore does not result in a new major stationary source and does not constitute a Major Modification, per 40 CFR 52.21(b)(23)(i)); hence, the project is not subject to PSD.

   b. NAAQS Impact Analysis

   District Rule 1302, section (D)(5)(b)(iv) requires that any new or Modified Facility located in an area classified by USEPA as attainment or unclassifiable shall determine if the Facility will cause or contribute to a violation of the National Ambient Air Quality Standards (NAAQS). Hourly and annual emissions increases from the proposed unit are minor, and determined by the District to be negligible relative to NAAQS.

7. Determination of Notice Requirements – District Rule 1302(C)(7)

   Under NSR, this permitting action is subject to the notice requirements of 1302(C)(7)(b)(iii). Please refer to Appendix A for noticing details.

D. <u>Proposed Changes to the Federal Operating Permit</u>:

GENERAL UPDATES

● General formatting corrections to improve the consistency of the Title V permits program.
● Update rule citations throughout the permit. Each rule citation was reformatted for program consistency which includes relocating the SIP citations to Part VII, Table 1. Table 1 sufficiently identifies each rule, the SIP status of the rule and the federal enforceability of each rule.

PART I: INTRODUCTORY INFORMATION

This section of the Federal Operating Permit contains general information about the UPP facility, including facility identifying information (section A), a description of the facility (section B), and a description of the facility's equipment (section C).

Changes made to this section of the FOP:

- Part I, Section A, the District added decimal latitude and longitude coordinates in addition to the UTM coordinates indicated.
- Part I, Section C, The equipment description for the new gel coat spray gun and associated equipment was added.

PART II: FACILITYWIDE APPLICABLE REQUIREMENTS; EMISSIONS LIMITATIONS; MONITORING, RECORDKEEPING, REPORTING AND TESTING REQUIREMENTS; COMPLIANCE CONDITIONS; COMPLIANCE PLANS

This section of the Federal Operating Permit contains requirements applicable to the entire facility and equipment (section A), facility-wide monitoring, recordkeeping, and reporting requirements (section B), and facility-wide compliance conditions (section C).

Changes made to this section of the FOP:

- Part II, Section A.21 was updated to reflect an administrative correction to District Rule 409 on 10/12/21.
- Part II, Section A.26, updated VOC limits of District Rule 1113 for 10/26/20 rule amendments.
- Part II, Section A. 27, updated VOC limits of District Rule 1114 for 8/24/20 rule amendments.
- Part II, Section 28, updated VOC limits of District Rule 1115 for 6/8/20 rule amendments.
- Part II, Section A. 29 updates with recent requirements from 8/23/10 District Rule 1116 amendments. As the facility is primarily engaged in fiberglass operations, District Rule 1116 is not generally not expected to apply at this facility.
- Part II, Section 31, Rule 1162 citation added.

PART III: EQUIPMENT SPECIFIC APPLICABLE REQUIREMENTS; EMISSIONS LIMITATIONS; MONITORING, RECORDKEEPING, REPORTING AND TESTING REQUIREMENTS; COMPLIANCE CONDITIONS; COMPLIANCE PLANS

This section of the Federal Operating Permit contains equipment-specific applicable requirements including emission limitations, monitoring and recordkeeping, reporting and testing, and compliance plans.

Changes made to this section of the FOP:

- Part III, Section A. was updated by adding a description of the new Portable Spray Gun for Fiberglass Gel Coat Operations, District Permit P015080. Subsection numbering updated to reflect conditions removed (see below)
- Part III, Section A.3 – Outdated condition removed. District Rule 442 limits for photochemically reactive and non-photochemically reactive solvents were changed to limits on VOC-containing solvent and non-VOC-containing solvent.
- Part III, Section A.5.k – Outdated and duplicative condition removed. District Rule 442 limits for photochemically reactive and non-photochemically reactive solvents were changed to limits on VOC-containing solvent and non-VOC-containing solvent.
- Part III, Section A.5.l – Outdated and duplicative condition removed. District Rule 442 limits for photochemically reactive and non-photochemically reactive solvents were changed to limits on VOC-containing solvent and non-VOC-containing solvent
- Part II, Section A.5.m – Added a condition requiring recordkeeping for materials containing cobalt bis(2-ethylhexanoate) to document compliance with a facility limit on quantity used (Part III, Section 15 below).
- Part III, Section 13 – Units abbreviation removed for consistency.
- Part III, Section 15 – Added a facility limit on usage of cobalt bis(2-ethylhexanoate), for compliance with District Rule 1320 and 1520.

PART IV: STANDARD FEDERAL OPERATING PERMIT CONDITIONS

This section of the Federal Operating Permit contains standard federal operating permit conditions.

Changes made to this section of the FOP:

● No changes were made to this section other than general format changes.

PART V: OPERATIONAL FLEXIBILITY

This section of the Federal Operating Permit contains information on Off Permit Changes.

Changes made to this section of the FOP:

● No changes were made to this section other than general format changes.

PART VI: CONVENTIONS, ABBREVIATIONS, DEFINITIONS, MDAQMD APPLICABLE SIP

This section of the Federal Operating Permit contains information on conventions, abbreviations, definitions and now includes a link to the table of MDAQMD SIP rules and regulations.

PART VII: DISTRICT SIP HISTORY AND CITATIONS

This section of the Federal Operating Permit contains a SIP table of all applicable District Rules.

E. Rule Applicability

District Rules

Rule 201/203 – *Permits to Construct/Permit to Operate*. Any equipment which may cause the issuance of air contaminants must obtain authorization for such construction from the Air Pollution Control Officer. UPP is in compliance with this rule as they have appropriately applied for a District permit for all new equipment and maintains District permits for all residing equipment per Part II, section C of their FOP.

Rule 204 – *Permit Conditions*. To assure compliance with all applicable regulations, the Air Pollution Control Officer (Executive Director) may impose written conditions on any permit. UPP complies with all applicable regulations per Part II, section A.3 and A.4 of their FOP.

Rule 206 – *Posting of Permit to Operate*. Equipment shall not operate unless the entire permit is affixed upon the equipment or kept at a location for which it is issued and will be made available to the District upon request. UPP complies with this regulation per Part II, section A.5 of their FOP.

Rule 207 – *Altering or Falsifying of Permit.* A person shall not willfully deface, alter, forge, or falsify any issued permit. UPP complies with this regulation per Part II, section A.6 of their FOP.

Rule 209 – *Transfer and Voiding of Permits*. UPP shall not transfer, whether by operation of law or otherwise, either from one location to another, from one piece of equipment to another, or from one person to another. When equipment which has been granted a permit is altered, changes location, or no longer will be operated, the permit shall become void. UPP complies with this regulation per Part II, section A.7 of their FOP.

Rule 217 – *Provisions for Sampling and Testing Facilitie*s. This rule stipulates that the APCO may require the applicant to provide and maintain requirements for sampling and testing. In the event that facilities be equipped to accommodate testing the APCO shall notify the Owner/Operator in writing of the required size, number and location of sampling ports; the size and location of the sampling platform: the access to the sampling platform, and the utilities for operating the sampling and testing equipment. UPP is in compliance with this rule per Part II, section A.8 of their FOP.

Rule 219 – *Equipment not Requiring a Permit*. This rule exempts certain equipment from District Permit. UPP is in compliance with this rule per Part II, section A.9.

Rule 221 – *Federal Operating Permit Requirement.* UPP is in compliance with this rule, as they currently hold and maintain a Federal Operating Permit.

Rule 301/312 – *Permit Fees/Fees for Federal Operating Permits*. UPP's annual permit fees are due by the applicable amounts.

Rule 401 – *Visible Emissions*. This rule limits visible emissions opacity to less than 20 percent (or Ringlemann No. 1). In normal operating mode, visible emissions are not expected to exceed 20 percent opacity. UPP has specific operating conditions that enforce compliance with this rule, specifically Part II, section A.14.

Rule 403 – *Fugitive Dust*. This rule prohibits fugitive dust beyond the property line of any emission source. UPP has specific operating conditions to ensure compliance with this condition, specifically Part II, section A.14.

Rule 403.2 – *Fugitive Dust Control for the Mojave Desert Planning Area*. This rule ensures that the NAAQS for PM10 will not be exceeded due to anthropogenic sources of fugitive dust with the Mojave Desert Planning Area. UPP is in compliance with this rule per Part II, section A.15.

Rule 404 – *Particulate Matter Concentration*. UPP shall not discharge into the atmosphere from this facility, particulate matter (PM) except liquid sulfur compounds, in excess of the concentration at standard conditions, shown in Rule 404, Table 404 (a).
(a) Where the volume discharged is between figures listed in the table the exact concentration permitted to be discharged shall be determined by linear interpolation.

(b) This condition shall not apply to emissions resulting from the combustion of liquid or gaseous fuels in steam generators or gas turbines.
(c) For the purposes of this condition, emissions shall be averaged over one complete cycle of operation or one hour, whichever is the lesser time period.
UPP adheres to this rule per Part II, section A.16 of their FOP.

Rule 405 – *Solid Particulate Matter, Weight*. UPP shall not discharge into the atmosphere from this facility, solid PM including lead and lead compounds in excess of the rate shown in Rule 405, Table 405(a):
(a) Where the process weight per hour is between figures listed in the table, the exact weight of permitted discharge shall be determined by linear interpolation.
(b) For the purposes of this condition, emissions shall be averaged over one complete cycle of operation or one hour, whichever is the lesser time period.
UPP adheres to this rule per Part II, section A.17 of their FOP.

Rule 406 – *Specific Contaminants*. This rule limits single source of emissions of sulfur compounds. UPP meets this requirement by complying with operating condition listed in Part II, section A.18 of their FOP. Note that UPP currently has no permitted combustion source.

Rule 407 – Liquid and Gaseous Air Contaminants. This rule limits CO emissions from facilities. UPP meets this requirement by complying with operating condition listed in Part II, section A.19 of their FOP. Note that UPP currently has no permitted combustion source.

Rule 408 – *Circumvention*. This rule prohibits hidden or secondary rule violations. The proposed renewal as described is not expected to violate Rule 408. UPP meets this requirement by complying with operating condition listed in Part II, section A.20 of their FOP.

Rule 409 – *Combustion Contaminants*. This rule limits the emissions of combustion contaminants exceeding 0.23 gram per cubic meter (0.1 grain per cubic foot) of gas calculated to 12 percent of carbon dioxide (CO_2) at standard conditions averaged over a minimum of 15 consecutive minutes. UPP meets this requirement by complying with operating condition listed in Part II, section A.21 of their FOP. Note that UPP currently has no permitted combustion source.

Rule 430 – *Breakdown Provisions*. Any Breakdown which results in a violation to any rule or regulation as defined by Rule 430 shall be properly addressed pursuant to this rule. UPP meets this requirement by complying with operating condition listed in Part II, section A.22 of their FOP.

Rule 442 – *Usage of Solvents*. This rule reduces VOC emissions from VOC containing materials or equipment that is not subject to any other rule in Regulation XI. UPP meets this requirement by complying with operating condition listed in Part II, section A.23 of their FOP.

Rule 444– *Open Outdoor Fires.* This rule limits the types of acceptable open outdoor burning effectively minimizing smoke impacts to the public. UPP meets this requirement by complying with the operating condition listed in Part II, section A.24 of their FOP.

Rule 900 – *Standards of Performance for New Stationary Sources (NSPS)*. Rule 900 adopts all applicable provisions regarding standards of performance for new stationary sources as set forth in 40 CFR 60. Currently there are no NSPSs applicable to UPP.

Rule 1104 – *Organic Solvent Degreasing Operations*. This rule limits the emission of VOCs from wipe cleaning and degreasing operations using organic solvents. UPP meets this requirement by complying with operating condition listed in Part II, section A.25 of their FOP.

Rule 1113 – *Architectural Coatings*. This rule limits the quantity of VOC in Architectural Coatings. UPP meets the requirements of this rule by complying with operating condition listed in Part II, section A.26 of their FOP.

Rule 1114– *Wood Products Coatings*. This rule limits the quantity of VOC in Wood Coatings. UPP meets the requirements of this rule by complying with operating condition listed in Part II, section A.27 of their FOP.

Rule 1115 – *Metal Parts and Products Coatings*. This rule limits the emission of VOC from coatings associated with Metal Parts and Products. UPP meets the requirements of this rule by complying with operating condition listed in Part II, section A.28 of their FOP.

Rule 1162 – *Polyester Resin Operations.* This rule limits the emission of VOC (and HAPS by nature of the HAPs present in resins) from Polyester Resin Operations, Fiberglass Boat Manufacturing Operations, organic Solvent cleaning, and the storage and disposal of Solvents and waste Solvent materials associated with such operations. UPP meets the requirements by complying with operating condition listed in Part II, sections A. 30-31 and Part III. Part II of the Title V permit was written to include the sections of the rule that specifically pertains to this facility's operations (for example the facility does not use closed molding nor do they have a VOC control device installed; therefore, section (C)(1)(b)(and (c) were not written into the permit.)

Regulation X – *National Emission Standards for Hazardous Air Pollutants*. Pursuant to Regulation X, UPP is required to comply with all applicable ATCMs.

Regulation XII – *Federal Operating Permits.* This regulation contains requirements for sources which must have a FOP. UPP currently has a FOP and is expected to comply with all applicable rules and regulations.

Rule 1201 – *Federal Operating Permit Definitions.* UPP is defined as a federal Major Facility pursuant to this rule.

Rule 1203 – *Federal Operating Permits*. This rule outlines the permit term, issuance, restrictions, content, operational flexibility, compliance certification, permit shield, and violations of Federal Operating Permits. UPP complies with this rule per Part II, sections B and C, and Part IV and V of their FOP.

Rule 1205 – *Modifications of Federal Operating Permits*. This action to UPP's FOP constitutes a Significant Modification; therefore, this rule is subject to this action.

Rule 1206 – *Reopening, Reissuance and Termination of Federal Operating Permits*. This action to UPP's FOP does not constitute a Reopening, Reissuance or Termination of Federal Operating Permits; therefore, this rule is not subject to this action.

Rule 1207 – *Notice and Comment*. This rule outlines the noticing requirements for Notice and Comment. UPP properly noticed this permit modification pursuant to this rule.

Rule 1208 – *Certification*. UPP included a Certification of Responsible Official as required with the submitted application for the Renewal.

Rule 1211 – *Greenhouse Gas Provisions of Federal Operating Permits*. UPP is not a Major GHG Facility pursuant to Rule 1211 and has no requirements pertaining to this regulation.

Regulation XIII – *New Source Review*. This regulation sets forth requirements for the preconstruction review of all new or modified facilities. The modification to the facility that results from the addition of the new spray gun that is the subject of this permit modification triggers applicability of this Regulation.

Rule 1520 – *Control of Toxic Air Contaminants from Existing Sources*. This rule controls the emission of toxic air contaminants from existing source. This permit action triggers the applicability of Rule 1520.

Regulation XVII – *Prevention of Significant Deterioration*
Please take notice that this regulation is not currently used within the MDAQMD because the USEPA has not delegated authority for the PSD Program to the MDAQMD at this time. That said, UPP is not a source subject to PSD as UPP annual emission are less than the applicability thresholds.

Federal Regulations

40 CFR 63, Subpart A – *NESHAP General Provisions*. UPP complies with this regulation per Part III, Section A.

40 CFR 63, Subpart WWWW – *NESHAP for Reinforced Plastic Composites*. UPP complies with this regulation per Part III, Section A. UPP does not use an add-on control device and is compliant through use of compliant materials and work practices.

40 CFR 63, Subpart VVVV – *NESHAP for Boat Manufacturing*. UPP complies with this regulation per Part III, Section A. UPP does not use an add-on control device and is compliant through use of compliant materials and work practices.

40 CFR 64, *Compliance Assurance Monitoring*. The Compliance Assurance Monitoring (CAM) rule (40 CFR 64) applies to each Pollutant Specific Emissions Unit (PSEU) when it is located at

a Major Facility that is required to obtain Title V, Part 70 or 71 permit and it meets all of the following criteria. "PSEU" means an emissions unit considered separately with respect to each regulated air pollutant.

The PSEU must:
a. Be subject to an emission limitation or standard [40 CFR 64; AND,
b. Use a control device to achieve compliance [40 CFR 64.2(a)(2)]; AND,
c. Have the **potential pre-control** emissions that exceed or are equivalent to the major source threshold. [40 CFR 64.2(a)(3)]

As part of its normal business operations, UPP emits VOC, HAPs, and Particulate Matter (PM) from each PSEU (spray booth). All spray booths share the facility Potential to Emit (PTE) for all pollutants; therefore, for purposes of CAM, each spray booth is considered to have a potential to emit equivalent to the facility PTE.

Facility VOC emissions are capped by permit condition not to exceed 24.9 tons per year, therefore; UPP does not qualify as a major source of VOC and CAM does not apply for VOC. The HAP emission PTE, primarily comprised of styrene and methyl methacrylate, is in excess of the major source threshold for a single HAP (styrene >10 tpy), however, because UPP does not employ a control device for HAP emissions, CAM does not apply. PM emissions are controlled by dry filter; however, uncontrolled PM emissions are minimal and do not exceed the 100 tpy major source threshold; therefore, CAM does not apply for PM.

.

F. CONCLUSIONS AND RECOMMENDATION:

The District has reviewed the application for the renewal of UPP Federal Operating Permit. The District has determined that the Significant Modification and NSR Modification is in compliance with all applicable District, state, and federal rules and regulations as proposed when operated in the terms of the permit conditions given herein. The proposed permit and corresponding statement of legal and factual basis will be publicly noticed pursuant to District Rules 1207 and 1302(C)(7)(b)(iii). To view the public notice please refer to Appendix A of this document.

G. PUBLIC COMMENT AND NOTIFICATIONS

1. Public Comment
This preliminary determination will be publicly noticed in accordance with District Rule 1207. Please see Appendix A of this document for noticing details.

2. Notifications
This preliminary determination will be submitted to USEPA and CARB pursuant to District Rule 1205 for a forty-five (45) day review period.

Director, Office of Air Division
USEPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105
via USEPA's Electronic Permitting System: https://cdx.epa.gov/

Chief, Stationary Source Division
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812
via email to permits@arb.ca.gov

Nick Adams, Owner
Unlimited Performance Products
8770 Caliente Road
Hesperia, CA 92345
net55@aol.com

Heberto Schramm, EHS Compliance
Unlimited Performance Products
8770 Caliente Road
Hesperia, CA 92345
hs@up22.com

APPENDIX A

Public Notice

Noticing Methods include the following, per District Rule 1207(A)(1) and 1302(C)(7)(b)(iii) and (d)(i)b. Please refer to the cover page of this document regarding the specific public noticing dates:

• Published in newspapers of general circulation - Riverside Press Enterprise (Riverside County) and the Daily Press (San Bernardino County).

• Mailed and/or emailed to MDAQMD contact list of persons requesting notice of actions (see the contact list following the Public Notice in this Appendix).

• Posted on the MDAQMD Website at the following link:
https://www.mdaqmd.ca.gov/permitting/public-notices-advisories/public-noticespermitting

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NOTICE OF TITLE V RENEWAL/SIGNIFICANT MODIFICATION AND NSR MODIFICATION

NOTICE IS HEREBY GIVEN THAT Unlimited Performance Products, located at 8770 Caliente Road, Hesperia, CA 92345 has applied for Preconstruction Review of a NSR Modification pursuant to the provisions of Mojave Desert Air Quality Management District (MDAQMD) Regulation XIII. The proposed action will be incorporated via a Significant Modification of their current Federal Operating Permit, pursuant to the provisions of Mojave Desert Air Quality Management District (MDAQMD) Regulation XII. In conjunction with this modification, UPP is also proposing renewal of their Federal Operating Permit 121902118. Applicant operates a facility engaged in reinforced plastic composites, manufacturing both aftermarket automotive parts and boat manufacturing.

This notice is published pursuant to District Rules 1207(A)(1) and 1302(C)(7)(b)(iii) and (d)(i)b. and in accordance with the provisions of District Rules 1207(A)A(1) (Federal Operating Permits) and 1302(D)(3)(a)(ii) (New Source Review). The proposed emissions change, relative to the operation of MDAQMD Permit No. P015080, for the Hazardous Air Pollutant (HAP) of styrene is in excess of the 8 tpy.

REQUEST FOR COMMENTS: Interested persons are invited to submit written comments and/or other documents regarding the terms and conditions of the proposed NSR action. If you submit written comments, you may also request a public hearing on the proposed issuance of the Federal Operating Permit. To be considered, comments, documents and requests for public hearing must be submitted no later than 5:00 P.M. on Saturday, December 21, 2024 to the MDAQMD, Attention: Kent Christensen at the address listed below.

PETITION FOR REVIEW: Federal Operating Permits are also subject to review and approval by the United States Environmental Protection Agency (USEPA). If EPA has not objected to the proposed title V permit during its 45-day review period, the public may petition EPA to object to the proposed Title V permit within 60 days of expiration of EPA's review period. Any such petition must be based on objections that were raised with reasonable specificity during the public comment period unless the petitioner demonstrates either that it was impracticable to raise such objections within the comment period or that the grounds for the objection arose after the comment period. The petitioner shall provide a copy of such petition to the permitting authority and the applicant/permittee. EPA's website contains more information on petitions, including instructions for submitting a petition and the required content of petitions: https://www.epa.gov/title-v-operating-permits/title-v-petitions

AVAILABILITY OF DOCUMENTS: The proposed Federal Operating Permit, as well as the application and other supporting documentation are available for review at the MDAQMD offices, 14306 Park Avenue, Victorville, CA 92392. In addition, these documents are available on the MDAQMD website and can be viewed at following link: https://www.mdaqmd.ca.gov/permitting/public-notices-advisories/public-notices-permitting

Please contact Kent Christensen, Air Quality Engineer, at the address herein, or via phone at (760) 245-1661, extension 5010, or via email at kchristensen@mdaqmd.ca.gov for additional questions pertaining to this action and/or corresponding documents.

Traducción en español esta disponible por solicitud. Por favor llame: (760) 245-1661

Sheri Haggard
Engineering Manager
Mojave Desert Air Quality Management District
14306 Park Avenue, Victorville, CA 92392

APPENDIX B

Applications

Mojave Desert Air Quality Management District

TITLE V – PERMIT AMENDMENT / MODIFICATION

RECEIVED
MDAQMD
24 MAY -1 AM 10:53

I. **PERMIT ACTION** (Check appropriate box)

☐ ADMINISTRATIVE AMENDMENT ☒ MINOR MODIFICATION ☐ SIGNIFICANT MODIFICATION

☐ OFF-PERMIT CHANGE

1. FACILITY NAME: Unlimited Performance Products	
2. FACILITY ID: 1219	
3. TITLE V PERMIT NO: 121902118	
4. TYPE OF ORGANIZATION: ☒ Corporation ☐ Sole Ownership ☐ Government ☐ Partnership ☐ Utility	
5. COMPANY NAME: Unlimited Performance Products	
6. COMPANY MAILING/BILLING ADDRESS: STREET/P.O. BOX: 8770 Caliente Road CITY: Hesperia STATE: CA 9-DIGIT ZIP CODE: 92345	
7. FACILITY ADDRESS: STREET: 8770 Caliente Road CITY: Hesperia STATE: CA 9-DIGIT ZIP CODE: 92345	PROPOSED DATE OF INSTALLATION: 2/15/2024
8. DISTANCES (FEET AND DIRECTION) TO CLOSEST: FENCELINE: 129 ft W RESIDENCE: 1,924 ft NW BUSINESS: 876 ft N SCHOOL: 6,465 ft NE	
9. GENERAL NATURE OF BUSINESS: Boat and car spraying	
10. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) Application for an open-air spray gun.	
11. PERSON TO CONTACT FOR INFORMATION ON THIS APPLICATION: NAME: Nick Adams PHONE NUMBER: (760) 948-0055 TITLE: Owner EMAIL: net55@aol.com	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and check all for confirmation):

☐ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).

☒ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.

☐ Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.

☐ Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

Signature of Responsible Official

30 Apr 2024
Date

Nick Adams
Name of Responsible Official (please print)

Owner
Title of Responsible Official (please print)

For AQMD Use Only:

DATE STAMP	*DISTRICT PERMIT APPLICATION NO:* _____	*COMPANY /FACILITY ID:* _____

MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT
BRAD POIRIEZ, *EXECUTIVE DIRECTOR*
14306 Park Ave., Victorville, CA 92392-2310
760.245.1661 • Fax 760.245.2022
Email: **engineering@mdaqmd.ca.gov**
www.MDAQMD.ca.gov • @MDAQMD

Application for spray booth and/or paint spray gun only

Remit **$374.00** with this document ***($213.00** for change of owner)*

PLEASE TYPE OR PRINT

Section 1: Owner information

a. Permit to be issued to *(company name)*: Unlimited Performance Products		b. Federal tax ID #:	
c. Billing address *(for above company name)* include city, state and ZIP code: 8770 Caliente Road, Hesperia, CA 92345			
d. Facility or business license name *(for equipment location)*: Unlimited Performance Products			
e. Facility address *(location of equipment)* include city and ZIP code: 8770 Caliente Road, Hesperia, CA 92345			f. Equip. coordinates (lat/long): 462.801E/3807.788N
g. Name of person completing application: Melissa Hernandez	h. Title: Project Manager	i. Email address: melissa.hernandez@cdms.com	j. Phone number: (562)359-2549
k. General nature of business: Fiberglass Automobile Parts Manufacturer; Fiberglass Composite Boat Manufacturer			l. Company NAICS: 336390; 336612

m. Type of Organization

☑ Individual owner ☐ Partnership ☑ Corporation ☐ Utility ☐ Local agency ☐ State agency ☐ Federal agency

Section 2: Nature of application

Application is for what type of permit?

☑ New construction ☑ Modification ☐ Change of owner

For modification or change of owner: Current Permit No.:

Do you claim Confidentiality of Data?

☑ No ☐ Yes *(attach explanation; specify which information provided is confidential)*

Section 3: Equipment information

Manufacturer: GS Manufacturing	Model: LW05	Serial No.:

Booth dimensions *(specify units)*: W _____ by L _____ by H _____

☑ Open spray (gun) ☐ Automotive booth ☐ Bench type booth ☐ Floor type booth

Section 3 continued on Page 2 →

For District use only

Application No.:	Invoice No.:	Permit No.:	Company/facility No.:
MDAQ4437	61334/MD20916	P015080	1219/2118

Section 3: *continued from Page 1*	
Exhaust fan (if present): Rating (hp): _____	Fan diameter (inches): _____
Manometer across exhaust filters? ☐ yes ☑ no	Minimum pressure drop: _____ inches H_2O

Section 4: Filters information					
	Type & material	**Number**	**Width**	**Length**	**Thickness**
Inlet					
Exhaust 1st stage					
Exhaust 2nd stage					
Exhaust 3rd stage					

Section 5: Application information

Article sprayed *(check all that apply)*: ☐ Aerospace ☐ Architectural ☐ Metal ☐ Plastic ☐ Composite ☐ Wood ☑ Motor vehicle ☑ Other (specify): Boats

Minimum size of articles sprayed *(feet)*: 8' width 16' length 4' height

Method of application *(check all that apply)*: ☑ Air atomization ☐ Pressure atomization *(airless)* ☐ Combined air and airless ☐ Electrostatic ☐ High volume low pressure (HVLP) ☐ Hand ☐ Other (specify):

Gen or spray system cleaning method: ☐ Enclosed gun cleaning system ☐ open flush ☑ manual wipe ☐ Other, (specify):

Section 6: Materials information

Please include the MSDS for each coating and solvent to be used with the application submission.

Type	**VOC content lb/gal or gm/liter**	**Vapor pressure mmHg @ 20°**	**Maximum use**	
			gal/l per day	**gal/l per year**
Enamel				
Topcoat				
Primer				
Sealer				
Stain				
Added thinner				
Clean-up solvent				
Surface preparation solution				
Other: Gelcoat				
Other:				

Section 7: Disposition

☑ Air dried ☐ oven dried, baked or cured *(specify below)* ☐ Part of booth ☐ Separate enclosure

Oven (if present) is: ☐ Gas-fired ☐ Electric Maximum heat input (Btu/hr):

Section 8: Receptor information

Distance (feet) and direction to the property line of nearest: 1720 residence 723 business 6317 school

Name of nearest school (K-12): Canyon Ridge High School

If the proposed equipment operates within 1,000 feet of a school site and operation results in the emission of hazardous air pollutants, a public notice will be required at the expense of the applicant (CH&S §42301.6)

***Please note:** District staff may contact you for further information. Failure to provide additional information as requested in a timely manner may result in delays in the processing of this permit application.*

Section 9: Certification

I hereby certify that all information contained herein is true and correct.

Name of responsible official:	Official title:	
Nick Adams	Owner	
Signature of responsible official:		
Phone number: (760)948-0055	Email address: net55@aol.com SKIPJACK BOATS @AOL.COM	Date signed: 3/26/2024

Application submission instructions

1) Submit completed application to **Engineering@mdaqmd.ca.gov**

2) Pay the corresponding application fee of **$374** per permit for new or modified permit (or ***$213*** for change of owner) via check or credit card.

Payment by check:
Make check payable to the Mojave Desert AQMD
Mail the check with a copy of this completed application to:
Mojave Desert AQMD
14306 Park Avenue
Victorville, CA 92392

RECEIVED MDAQMD 24 APR 10 AM 11:40

Payment by credit card:
Pay online at **https://mdaqmd.ca.gov**
Click ***"Pay Fees"***
Please note: ***a surcharge applies for all credit card payments.***

3) If payment is made online via credit card, email receipt along with completed application form to **Engineering@mdaqmd.ca.gov**

Contact the MDAQMD Permit Engineering section with additional questions:
760-245-1661 or **engineering@mdaqmd.ca.gov**