
***MOJAVE DESERT
AIR QUALITY MANAGEMENT DISTRICT***

FOP Evaluation Document

**Preliminary Determination - Statement of Basis
for
Renewal of**

FOP Number: 39701067

For:

Mobile Pipe Lining and Coating, Inc.

Facility:

Mobile Pipe Lining and Coating, Inc.

Facility Address:

**12766 Violet Road
Adelanto, CA 92301**

Document Date: **November 8, 2019**

Submittal date to EPA/CARB for review: **November 8, 2019**

EPA/CARB 45-day Commenting Period ends: **December 23, 2019**

Public Notice Posted: **November 8, 2019**

Permit Issue date: On or about **January 9, 2019**

Permitting Engineer:

Roseana Brasington

14306 PARK AVENUE, VICTORVILLE, CALIFORNIA 92392
PHONE: (760) 245-1661 • FAX: (760) 245-2022 • EMAIL: PERMITTING@MDAQMD.CA.GOV

A. FACILITY IDENTIFYING INFORMATION:

Owner/Company Name: Mobile Pipe Lining & Coating, Inc.

Owner Mailing Address: Mobile Pipe Lining & Coating, Inc.
12766 Violet Road
Adelanto, California 92301

Facility Name: Mobile Pipe Lining & Coating, Inc.

Facility Location & Mailing Address: 12766 Violet Road
Adelanto, California 92301

MDAQMD Federal Operating Permit Number: 039701067

MDAQMD Company Number: 0397

MDAQMD Facility Number: 01067

Responsible Official: James Harvey
Title: General Manager
Phone Number: 760-246-4707
Email Address: jharvey@mobilepipe.net

Facility "Site" Contacts: James Harvey
Phone Number: 760-246-4707
Fax Number: 760-246-4348

Facility "Site" Contacts: Mark Tessororf
Title: Production Manager
Phone Number: 760-246-4707

Nature of Business: Cleaning and Coating of Steel Pipes
SIC Code: 3479 Coating/Cleaning Pipe Operations
Facility Coordinates: UTM (km) 3824.559 N / 464.660 E

B. BACKGROUND:

The Federal Clean Air Act Amendments of 1990 established a nation-wide permit to operate program commonly known as "Title V". The Mojave Desert Air Quality Management District (MDAQMD or District) adopted Regulation XII [Rules 1200-1210] and Rule 221 - *Federal Operating Permit Requirement*; [Version in SIP = Current, 40CFR 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 (The facility Mobile Pipe Lining and Coating, Inc.; hereafter, Mobile Pipe) 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*. The facility is defined as a federal Major Facility pursuant to District Rule 1201 – *Federal Operating Permit Definition*, as this facility has a Potential to Emit (PTE) greater than the Major Facility thresholds volatile organic compounds (VOC) and Particulate Matter less than 10 microns in size.

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 Federal Operating Permit. These requirements can be federally enforceable or non-federally enforceable. State and District only applicable requirements are designated as such.

The purpose of this action is to renew the Federal Operating Permit held by Mobile Pipe.

C. DESCRIPTION OF FACILITY:

Federal Operating Permit (FOP number: 39701067) is for Mobile Pipe Lining & Coating, Inc, (Mobile Pipe) located at 12766 Violet Road, in Adelanto, California. Mobile Pipe is facility engaging in the coating and lining of steel pipes. The basic processes of the facility are cleaning, coating, and lining of steel pipes of a broad spectrum of sizes. This facility uses support processes to achieve the foregoing, which are described as: pre-heating, abrasive blasting, high-pressure scrubbing, hot enamel tanks and coal tar coating, wrapping machines, and spray coating. Emitting equipment at the facility includes open abrasive blasting equipment, pipe wrapping, spray coating, the hot enamel and coal tar tanks which are vented to the high-pressure scrubber, and a concrete batch plant which is vented to bin vents.

Mobile Pipe is located in a “Zone A” area as defined by Rule 1201(S)(1) which means that the area is designated Federal Ozone Non-Attainment.

POLLUTANT	STATE AREA DESIGNATION	FEDERAL AREA DESIGNATION
OZONE Precursors: NO _x , VOC	NONATTAINMENT	NONATTAINMENT
NO ₂	ATTAINMENT	UNCLASSIFIED/ATTAINMENT
CO	UNCLASSIFIED	UNCLASSIFIED/ATTAINMENT
PM ₁₀ Precursors: SO _x , NO _x , VOC	NONATTAINMENT	NONATTAINMENT
PM _{2.5}	NONATTAINMENT	UNCLASSIFIED/ATTAINMENT
SO ₂	ATTAINMENT	UNCLASSIFIED

Mobile Pipe is a Major Facility because the facility has the “Potential to Emit (PTE)” in excess of the thresholds for Reactive Organic Gases (ROG), Particulate Matter less than 10 microns in size (PM₁₀) as defined by Rule 1201(S)(1).

POLLUTANT	THRESHOLD	TOTAL FACILITY PTE	MAJOR?
NO _x	25	<25 TPY	NO
VOC	25	45.6 TPY	YES
PM ₁₀	100	45.6 TPY	YES
SO _x	25	<25 TPY	NO
CO	25	<25 TPY	NO
HAP	10 ANY HAP 25 ANY COMBINATION OF HAP	9.9 TPY ANY ONE HAP 24.9 TPY ANY COMBINATION OF HAP	NO

D. MODIFICATIONS TO CURRENT FEDERAL OPERATING PERMIT:

GENERAL UPDATES

- General formatting 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. The table 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 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:

- Added two permit units to the FOP.

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. Updated to include rule revisions which occurred since the time of the last renewal.
- Part II, Section B, Added hard dates on which Compliance Certification, Semi-annual Monitoring reports are due. The proposed change will not cause a lapse in reporting because the initial report following issuance of the modified Federal Operating permit will cover the period commencing the end of the most recent reporting period and extend through the end of the new reporting period.

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:

- Updated Part III, Section B, aligned equipment specific conditions in the FOP with current District permit conditions.

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: None

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: None

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

This section of the Federal Operating Permit contains information on conventions, abbreviations and definitions.

Changes made to this section of the FOP: None

PART VII: DISTRICT SIP HISTORY AND CITATIONS

This section of the Federal Operating Permit contains a SIP table of all applicable District Rules and includes a link to the table of MDAQMD SIP rules and regulations.

Changes made to this section of the FOP: None

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. The facility is in compliance with this rule as they have appropriately applied for a District permit for all new equipment and maintain District permits for all residing equipment per Part II, section A 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. The Facility complies with all applicable regulations per Part II, section A 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. The facility 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. The facility complies with this regulation per Part II, section A of their FOP.

Rule 209 – *Transfer and Voiding of Permits*. 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. The facility complies with this regulation per Part II, section A of their FOP.

Rule 217 – *Provisions for Sampling and Testing Facilities*. This rule stipulates that the APCO may require the applicant to provide and maintain requirements for sampling and testing. In the event that facilities are required to 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. The facility is in compliance with this rule per Part II, section A of their FOP.

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

Rule 221 – *Federal Operating Permit Requirement*. The facility 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*. The facility 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. The facility has specific operating conditions that enforce compliance with this rule, specifically Part II, section A.

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

Rule 404 – *Particulate Matter Concentration*. The facility 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.

The facility adheres to this rule per Part II, section A of their FOP.

Rule 405 – *Solid Particulate Matter, Weight*. The facility 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.

The facility adheres to this rule per Part II, section A of their FOP.

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

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

Rule 408 – *Circumvention*. This rule prohibits hidden or secondary rule violations. The proposed renewal as described is not expected to violate Rule 408. The facility meets this requirement by complying with operating condition listed in Part II, section A 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 (CO₂) at standard conditions averaged over a minimum of 25 consecutive minutes. The facility meets this requirement by complying with operating condition listed in Part II, section A of their FOP. Note that The facility currently has no permitted combustion sources.

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. The facility meets this requirement by complying with operating condition listed in Part II, section A 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. The facility meets this requirement by complying with operating condition listed in Part II, section A 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 the facility.

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

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

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

Regulation X – *Emission Standards for Additional Specific Air Contaminants*. Pursuant to Regulation X, the facility is required to comply with all applicable ATCMs, MACTs and NESHAPS. There are currently no ATCMs that apply to the facility. The specific MACTs/NESHAPS applicable to the facility are listed under the Federal Requirements below.

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

Rule 1201 – *Federal Operating Permit Definitions*. The facility 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. The facility 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 rule sets forth the procedures required for administrative, minor and significant modifications of a FOP. This permitting action is a renewal of the facility's FOP will be processed in accordance with the procedure for renewal as set forth in rule 1203. The facility is required to comply with the provisions of Rule 1205 when requesting administrative, minor and significant modifications per Part II, section A of their FOP.

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

Rule 1207 – *Notice and Comment*. This rule outlines the noticing requirements for Notice and Comment. The facility has and/or will properly notice(d) their renewal pursuant to this rule.

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

Rule 1211 – *Greenhouse Gas Provisions of Federal Operating Permits*. The facility 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 FOP renewal does not result in an increase in for any criteria pollutant therefore the facility is not New or Modified; therefore, this regulation does not apply.

Rule 1520 – *Control of Toxic Air Contaminants from Existing Sources*. This rule controls the emission of toxic air contaminants from existing source. This permitting action does not trigger the applicability of Rule 1520.

Regulation XVII – *Prevention of Significant Deterioration*

This facility is not a source subject to PSD as annual emissions are less than the PSD applicability thresholds.

Federal Regulations

40 CFR 63, Subpart A – *NESHAP General Provisions*. The facility complies with this regulation per Part II, Section C.

40 CFR 63, Subpart HHHHHH—National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. Mobile Pipe Lining and Coating, Inc. is not subject to 40 CFR 63, Subpart HHHHHH as they do not perform spray application of coatings, as defined in §63.11180, to motor vehicles and mobile equipment [40 CFR 63.11170(a)(2)]. Furthermore, Mobile Pipe Lining and Coating, Inc. is prohibited from performing spray application of coatings that contain the target HAP, as defined in §63.11180, to a plastic and/or metal substrate on a part or product [40 CFR 63.11170(a)(3)], see prohibitive condition under Part II, Section C.

40 CFR 63, Subpart M – NESHAP for Asbestos. The facility complies with this regulation per Part II, Section C.

40 CFR 63, Subpart XXXXXX—National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories. Mobile Pipe Lining and Coating, Inc. is not subject to 40 CFR 63, Subpart XXXXXX as they do not own or operate an area source that is primarily engaged in the operations in one of the nine source categories listed in paragraphs (a)(1) through (9) of section 63.11514.

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)]

Facility PM10 and VOC emissions are each capped by permit condition not to exceed 45.6 tons per year, therefore; the facility is a major source of PM10 and VOC. CAM is not applicable for neither PM10 nor VOC because the facility does not operate any permit units which are

controlled by a PSEU and have a PTE over the Major Source threshold. . Please see the CAM analysis table on the following page for justification:

Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION – COMPLIANCE ASSURANCE MONITORING APPLICABILITY DETERMINATION FORM

I. FACILITY INFORMATION

1. FACILITY NAME: Mobile Pipe Lining & Coating, Inc.
2. FACILITY ID: 01067
3. TITLE V PERMIT #: 039701067

II. CAM STATUS SUMMARY FOR EMISSION UNITS

4. Based on the criteria in the instructions (check one and attach additional pages as necessary):						
a. <input type="checkbox"/> There are no emission units with control devices at this Title V facility.						
b. <input checked="" type="checkbox"/> There are emission units with control devices at this Title V facility, and the CAM applicability is shown below for each unit. A CAM plan is attached for each affected emissions unit.						
5. EMISSION UNIT (APPLICATION OR PERMIT #)	6. EQUIPMENT DESCRIPTION	UNCONTROLLED EMISSIONS		9. UNCONTROLLED POTENTIAL EMISSIONS EXCEED THE MAJOR SOURCE THRESHOLD AND USE A CONTROL DEVICE?	10. EXEMPT FROM CAM BY 40 CFR 64.2(b)(1)? (ENTER YES OR NO. IF YES, STATE THE REASON FOR EXEMPTION)	11. IS A CAM PLAN REQUIRED?
		7. POLLUTANT TYPE	8. PTE (tons/year)			
B002427	Pipe Cleaning/Application	PM	0	No	No	No
B002429	Pipe Coating/Wrapping	VOC	<25	No	No	No
A012781	Wheel Blast Equipment	PM	<25	No	No	No
B007998	Cement Mortar Batch Plant	PM	<25	No	No	No

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F. CONCLUSIONS AND RECOMMENDATION:

The District has reviewed the application for the renewal of the Federal Operating Permit. The District has determined that the renewal permit 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 has been, or will be, publicly noticed pursuant to District Rule 1207. 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

Chief, Stationary Source Division
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

APPENDIX A

Public Notice

Noticing Methods include the following, per District Rule 1207 (A)(1)(a):

- Scheduled to be published in newspapers of general circulation - Riverside Press Enterprise (Riverside County) and the Daily Press (San Bernardino County) on Friday November 8, 2019.
- Mailed and/or emailed to MDAQMD contact list of persons requesting notice of actions (see the contact list following the Public Notice in Appendix A).
- Posted on the MDAQMD Website at the following link:
<http://mdaqmd.ca.gov/permitting/public-notices-advisories/public-notices-permitting-regulated-industry>

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NOTICE OF TITLE V PERMIT ACTIONS

NOTICE IS HEREBY GIVEN THAT *Mobile Pipe Lining & Coating, Inc.* located at *12766 Violet Road, Adelanto, CA 92301*, located within the Mojave Desert Air Quality Management District (MDAQMD), has applied for the renewal of a Federal Operating Permit (FOP) pursuant to the provisions of MDAQMD Regulation XII. Applicant is a *steel pipe cleaning and coating operation* of a size requiring a Title V Permit. Applicant is required to obtain the *renewal* of the FOP because *the current permit expired September 15, 2019*.

REQUEST FOR COMMENTS: Interested persons are invited to submit written comments and/or other documents regarding the terms and conditions of the proposed Federal Operating Permit and the proposed reissuance. If you submit written comments, you may also request a public hearing on the proposed issuance of the FOP. To be considered, comments, documents and requests for public hearing must be submitted no later than 5:00 P.M. on *December 9, 2019* to the MDAQMD, at the address listed below.

PETITION FOR REVIEW: Title V Permits, once issued, are also subject to review and approval by USEPA. If USEPA has not objected to a proposed permit and the MDAQMD has not addressed a public comment in a satisfactory manner, the public may petition USEPA, Region IX, Operation Permits Section at 75 Hawthorne Street, San Francisco, CA 94105 within 60 days after the end of the USEPA review period for USEPA to reconsider its decision not to object to the permit.

AVAILABILITY OF DOCUMENTS: Copies of the *permit renewal* and supporting documentation are available from the MDAQMD by contacting *Roseana Brasington* at Mojave Desert Air Quality Management District, 14306 Park Avenue, Victorville, CA 92392-2310; Phone: (760) 245-1661, 5706, via email at rnbrasington@mdaqmd.ca.gov or via www.mdaqmd.ca.gov. Traducción esta disponible por solicitud.

Sheri Haggard
Supervising Air Quality Engineer
Mojave Desert Air Quality Management District

APPENDIX B

Application

Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION – GENERAL FACILITY INFORMATION

1. FACILITY ID: <u>01067</u>		FACILITY SIC CODE: <u>3479</u>	
TITLE V PERMIT NUMBER: <u>039701067</u>		PERMIT EXPIRATION DATE: <u>9/15/2019</u>	
2. COMPANY NAME: <u>Mobile Pipe Lining& Coating, Inc.</u>			
3. COMPANY MAILING ADDRESS:			
STREET/P.O. BOX: <u>12766 Violet Road</u>		9-DIGIT	
CITY: <u>Adelanto</u>	STATE: <u>CA</u>	ZIP CODE:	<u>92301</u>
4. FACILITY NAME: <u>Mobile Pipe Lining& Coating, Inc.</u>			
5. FACILITY MAILING ADDRESS:			
STREET/P.O. BOX: <u>12766 Violet Road</u>		9-DIGIT	
CITY: <u>Adelanto</u>	STATE: <u>CA</u>	ZIP CODE:	<u>92301</u>
6. RESPONSIBLE OFFICIAL (AS DEFINED IN 40 CFR 70.2 AND MDAQMD RULE 1201)			
NAME: <u>James Harvey</u>	TITLE: <u>General Manager</u>	PHONE NUMBER	<u>760-246-4707</u>
7. TITLE V PERMIT CONTACT PERSON			
NAME: <u>James Harvey</u>	TITLE: <u>General Manager</u>	PHONE NUMBER	<u>760-246-4707</u>
8. TYPE OF ORGANIZATION:			
<input checked="" type="checkbox"/> CORPORATION <input type="checkbox"/> SOLE OWNERSHIP <input type="checkbox"/> GOVERNMENT <input type="checkbox"/> PARTNERSHIP <input type="checkbox"/> UTILITY			
9. CAM (COMPLIANCE ASSURANCE MONITORING) PLANS			
Are you required to submit a CAM plan for any emissions unit at this facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
If yes, submit a CAM plan for each emissions unit as an attachment to the application. See attached CAM plan instructions for more detail.			

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Revised: December 2012

Title V Renewal – 1202E2-A

10. ALTERNATE OPERATING SCENARIOS
 Does this application request alternative operating scenarios pursuant to Rule 1203(E)? Yes No
 If yes, submit an Alternate Operating Scenarios form, as applicable.


11. RISK MANAGEMENT PLAN
 Has this facility been required to prepare a federal Risk Management Plan pursuant to Section 112(r) of the federal Clean Air Act and 40 CFR Part 68? Yes No
 If yes, has the federal Risk Management Plan been submitted to the implementing agency? Yes No
 If a federal Risk Management Plan is required but has not been submitted to the implementing agency, provide a detailed explanation as an attachment to the application.

12. STRATOSPHERIC OZONE
 Does the facility conduct any activities that are regulated by the federal protection of stratospheric ozone requirements in 40 CFR Part 82? Yes No

13. ACID RAIN
 Is this facility subject to the acid rain requirement in 40 CFR Part 72 through 40 CFR Part 78? Yes No

14. MAJOR SOURCE STATUS
 Is this facility a major source of greenhouse gases, as defined in MDAQMD Rule 1211? Yes No
 Is this facility a major source of any of the following pollutants:
 VOCs Particulate Matter Carbon Monoxide Nitrogen Oxides Sulfur Dioxides
 Lead HAP

15. PERMIT SHIELDS
 Does the current Title V permit for this facility include any permit shields? Yes No
 If yes, is the basis for each permit shield still correct? Yes No
 If the current Title V permit contains any permit shield for which the basis is no longer correct, provide a detailed explanation as an attachment to the application. If you are requesting an additional permit shield, complete the attached Permit Shield Request form.

16. CERTIFICATION BY RESPONSIBLE OFFICIAL
 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:  Date: 5/6/19

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Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION – APPLICATION CERTIFICATION

I. FACILITY INFORMATION

1. FACILITY NAME: Mobile Pipe Lining & Coating, Inc.
2. FACILITY ID: 01067
3. TITLE V PERMIT #: 039701067

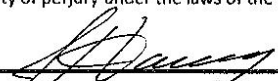
II. TITLE V PERMIT CERTIFICATION (Read each statement carefully and check one):

- The current Title V permit has been reviewed and it has been determined that equipment descriptions are correct, and all requirements are still applicable.
- The current Title V permit has been reviewed and errors have been found in equipment descriptions and/or permit requirements. A copy of the Title V permit is attached with redline changes. Permit application and/or modification forms are enclosed, as applicable.

III. 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), except for those requirements listed in the "Title V Non-Compliant Operations Report".
- 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, except for those requirements listed in the "Title V Non-Compliant Operations Report".
- 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

5-6-19

Date

Jim Harvey

Name of Responsible Official (please print)

General Manager

Title of Responsible Official (please print)

14306 Park Avenue, Victorville, CA 92392 | Tel: (760)245-1661

Mojave Desert Air Quality Management District
TITLE V PERMIT RENEWAL APPLICATION – NON-COMPLIANT OPERATIONS (DEVIATIONS) REPORT
AND PART 70 COMPLIANCE SCHEDULE/PLAN AND QUALITY IMPROVEMENT PLAN - QIP

I. FACILITY INFORMATION

1. FACILITY NAME: _____	2. FACILITY ID _____	3. PERMIT NUMBER _____
-------------------------	----------------------	------------------------

II. NON-COMPLIANT OPERATIONS REPORT

4. Compliance status: a. <input type="checkbox"/> This facility has experienced non-compliant operations as described below but achieved compliance with the applicable requirements on _____ b. <input type="checkbox"/> This facility continues to experience non-compliance with the applicable requirements as described below:			
5. PERMIT # OF EQUIPMENT	6. APPLICABLE REQUIREMENT (Rule or Permit Condition Number)	7. FEDERALLY ENFORCEABLE REQUIREMENT?	8. DESCRIPTION OF NON-COMPLIANT OPERATIONS (Attach additional sheets as needed)
		<input type="checkbox"/> Yes <input type="checkbox"/> No	
		<input type="checkbox"/> Yes <input type="checkbox"/> No	
		<input type="checkbox"/> Yes <input type="checkbox"/> No	

III. PART 70 COMPLIANCE SCHEDULE/PLAN AND QIP

9. DESCRIBE HOW COMPLIANCE WAS OR WILL BE ACHIEVED	10. COMPLIANCE SCHEDULE	
	DATE	REMEDIAL MEASURES AND MILESTONES

IV. PROGRESS REPORT SCHEDULE

11. CERTIFIED PROGRESS REPORTS WILL BE SUBMITTED ACCORDING TO THE FOLLOWING SCHEDULE: (CHECK a or b and complete c):			
a. <input type="checkbox"/> Semi-annually	b. <input type="checkbox"/> More frequently as specified	c. Submittal dates: 1) _____ 2) _____ 3) _____ 4) _____	

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Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION – LIST OF EXEMPT EQUIPMENT

I. FACILITY INFORMATION

1. FACILITY NAME: Mobile Pipe Lining & Coating, Inc.
2. FACILITY ID: 01067
3. TITLE V PERMIT #: 039701067

II. SUMMARY OF EQUIPMENT EXEMPT FROM PERMIT REQUIREMENTS (INCLUDING PORTABLE)

4. EXEMPT EQUIPMENT DESCRIPTION	5. VENTING TO CONTROL (PERMIT #)	6. CONTROL DEVICE DESCRIPTION	7. BASIS FOR EXEMPTION (e.g. Rule 219(D)(2)(b))
Small natural gas combustion units			Rule 219(E)(2)(b)
EcoQuip water blaster			Rule 219(E)(6)(a)

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Revised: December 2012

Title V Renewal – 1202E2-D

Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION – POTENTIAL EMISSIONS REPORT, CRITERIA POLLUTANTS & HAPs

I. FACILITY INFORMATION

1. FACILITY NAME: Mobile Pipe Lining & Coating, Inc.
2. FACILITY ID: 01067
3. TITLE V PERMIT #: 039701067

II. POTENTIAL ANNUAL EMISSIONS

4. EMISSION UNIT (APPLICATION OR PERMIT #)	5. EQUIPMENT DESCRIPTION	6. POTENTIAL ANNUAL EMISSIONS							
		NOx (TPY)	VOC (TPY)	PM10 (TPY)	PM2.5 (TPY)	SOx (TPY)	CO (TPY)	Other: HAPs (TPY)	Other: (TPY)
A002432	Abrasive Blasting 1		Facility wide PTE: 39	Facility wide PTE: 39	✓			Facility wide PTE: 24.9	
A002433	Abrasive Blasting 2				✓				
A002434	Abrasive Blasting 5				✓				
A002435	Abrasive Blasting 4				✓				
A002436	Abrasive Blasting 3				✓				
S002431	Open Spray Station				✓				
B002427	Pipe Cleaning/Application	✓			✓	✓	✓		
B002429	Pipe Coating/Wrapping	✓			✓	✓	✓		
B007998	Mortar Batch Plant				✓				
C002428	Dust Collector System				✓				
C002430	HP Water Scrubber		✓						
C012493	Dust Collector Cement Silo		✓						

A012781 Wheel Blast Equipment
 C012782 Dust Collector Wheel Blast
 14306 Park Avenue, Victorville, CA 92392 | Tel: (760)245-1661

Revised: December 2012

Title V Renewal – 1202E2-E

Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION – POTENTIAL GREENHOUSE GAS EMISSIONS REPORT

I. FACILITY INFORMATION

1. FACILITY NAME: Mobile Pipe Lining & Coating, Inc.
2. FACILITY ID: 01067
3. TITLE V PERMIT #: 039701067

II. POTENTIAL ANNUAL EMISSIONS

4. EMISSION UNIT (APPLICATION OR PERMIT #)	5. EQUIPMENT DESCRIPTION	6. POTENTIAL ANNUAL EMISSIONS							
		CO ₂ (TPY)	N ₂ O (TPY)	CH ₄ (TPY)	HFCs (TPY)	PFCs (TPY)	SF ₆ (TPY)	Other: (TPY)	CO ₂ (e) (TPY)
A002432	Abrasive Blasting 1								
A002433	Abrasive Blasting 2								
A002434	Abrasive Blasting 5								
A002435	Abrasive Blasting 4								
A002436	Abrasive Blasting 3								
S002431	Open Spray Station								
B002427	Pipe Cleaning/Application	✓	✓	✓					✓
B002429	Pipe Coating/Wrapping	✓	✓	✓					✓
B007998	Mortor Batch Plant								
C002428	Dust Collector System								
C002430	HP Water Scrubber								
C012493	Dust Collector Cement Silo								

A012781 Wheel Blast Equipment
 C012782 Dust Collector Wheel Blast
 14306 Park Avenue, Victorville, CA 92392 | Tel: (760)245-1661

Revised: December 2012

Title V Renewal – 1202E2-E

Mojave Desert Air Quality Management District

**TITLE V PERMIT RENEWAL APPLICATION – COMPLIANCE ASSURANCE MONITORING
APPLICABILITY DETERMINATION FORM**

I. FACILITY INFORMATION

1. FACILITY NAME: Mobile Pipe Lining & Coating, Inc.
2. FACILITY ID: 01067
3. TITLE V PERMIT #: 039701067

II. CAM STATUS SUMMARY FOR EMISSION UNITS

4. Based on the criteria in the instructions (check one and attach additional pages as necessary):

a. There are no emission units with control devices at this Title V facility.

b. There are emission units with control devices at this Title V facility, and the CAM applicability is shown below for each unit. A CAM plan is attached for each affected emissions unit.

5. EMISSION UNIT (APPLICATION OR PERMIT #)	6. EQUIPMENT DESCRIPTION	UNCONTROLLED EMISSIONS		9. UNCONTROLLED POTENTIAL EMISSIONS EXCEED THE MAJOR SOURCE THRESHOLD AND USE A CONTROL DEVICE?	10. EXEMPT FROM CAM BY 40 CFR 64.2(b)(1)? (ENTER YES OR NO. IF YES, STATE THE REASON FOR EXEMPTION)	11. IS A CAM PLAN REQUIRED?
		7. POLLUTANT TYPE	8. PTE (tons/year)			
B002427	Pipe Cleaning/Application	PM	0	No	No	No
B002429	Pipe Coating/Wrapping	VOC	<25	No	No	No
A012781	Wheel Blast Equipment	PM	<25	No	No	No
B007998	Cement Mortar Batch Plant	PM	<25	No	No	No

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Revised: December 2012

Title V Renewal – 1202E2-F

Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION – PERMIT SHIELD REQUEST

I. FACILITY/APPLICATION INFORMATION

1. FACILITY NAME:
2. FACILITY ID:
3. TITLE V PERMIT #:
4. IDENTIFY EXISTING EQUIPMENT FOR WHICH A PERMIT SHIELD IS REQUESTED: PERMIT #: _____ EQUIPMENT DESCRIPTION: _____
5. ARE MULTIPLE PERMIT SHIELD APPLICATIONS FOR SIMILAR EQUIPMENT AS THE EQUIPMENT DESCRIBED ABOVE BEING SUBMITTED AT THE SAME TIME? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, provide the number of multiple units: _____

II. PERMIT SHIELD INFORMATION

6. REGULATORY REQUIREMENTS FOR WHICH A PERMIT SHIELD IS SOUGHT
7. REASON(S) FOR REQUESTING A PERMIT SHIELD:
8. ESTIMATED TIME THAT THE PERMIT SHIELD SHOULD LAST (CHECK ONE): a. <input type="checkbox"/> For the life of the permit b. <input type="checkbox"/> Other (Specify): _____

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Revised: December 2012

Title V Renewal – 1202E2-G

Mojave Desert Air Quality Management District

TITLE V PERMIT RENEWAL APPLICATION – ALTERNATE OPERATING SCENARIOS

I. FACILITY/APPLICATION INFORMATION

1. FACILITY NAME:
2. FACILITY ID:
3. TITLE V PERMIT #:
4. THIS APPLICATION IS FOR: (check one) <input type="checkbox"/> An alternative operating scenario <input type="checkbox"/> Emissions trading under a facility emissions limit

II. DETAILED SUMMARY

5. PROVIDE A DETAILED SUMMARY OF PROPOSED ALTERNATE OPERATING SCENARIOS OR EMISSIONS TRADING, AS DISCUSSED IN THE INSTRUCTIONS.

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Revised: December 2012

Title V Renewal – 1202E2-H

B. DESCRIPTION OF FACILITY:

Federal Operating Permit (FOP number: 39701067) is for Mobile Pipe Lining & Coaters, Inc. (Mobile Pipe), is located at 12766 Violet Road, in Adelanto, California. Mobile Pipe is a coater and liner operation of steel pipes. The basic processes of the facility are the cleaning, coating and lining of steel pipes of a broad spectrum of sizes. This facility uses support processes to achieve the foregoing, which are described as: pre-heating, abrasive blasting, high-pressure scrubbing, hot enamel tanks and coal tar coating, wrapping machines, and spray coating. Emitting equipment at the facility includes open abrasive blasting equipment, pipe wrapping and spray coating, the hot enamel and coal tar tanks which are vented to the high-pressure scrubber, and a cement mortar batch plant which is vented to bin vents.

C. EQUIPMENT DESCRIPTION:

District Permit	Permit Type	Permit Description
A002432	Abrasive Blasting Equipment	OPEN ABRASIVE BLASTING SYSTEM - NO. 1
A002433	Abrasive Blasting Equipment	OPEN ABRASIVE BLASTING SYSTEM - NO. 2
A002434	Abrasive Blasting Equipment	OPEN ABRASIVE BLASTING SYSTEM - NO. 5
A002435	Abrasive Blasting Equipment	OPEN ABRASIVE BLASTING SYSTEM - NO. 3
A002436	Abrasive Blasting Equipment	OPEN ABRASIVE BLASTING SYSTEM - NO. 4
B002427	Basic	PIPE CLEANING AND APPLICATION LINE
B002429	Basic	PIPE COATING AND WRAPPING LINE
B007998	Basic	CEMENT MORTAR BATCH PLANT
C002428	Air Pollution Control Device	DUST COLLECTOR SYSTEM
C002430	Air Pollution Control Device	HIGH PRESSURE WATER SCRUBBER SYSTEM
C012493	Air Pollution Control Device	DUST COLLECTOR, CEMENT SILO
S002431	Portable Spray Gun	OPEN SPRAY STATION FOR PIPE SECTIONS

A012781 Abrasive Blasting Equipment WHEEL BLAST EQUIPMENT
 C012782 Air Pollution Control Device DUST COLLECTOR, VENTING WHEEL BLAST EQUIPMENT



MOJAVE DESERT AIR QUALITY MANAGEMENT DISTRICT

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

PERMIT TO OPERATE

A002432

Operation under this permit must be conducted in compliance with all information included with the initial application, initial permit condition, and conditions contained herein. The equipment must be maintained and kept in good operating condition at all times. This Permit to Operate or copy must be posted on or within 8 meters of equipment. If a copy is posted, the original must be maintained on site, available for inspection at all times.

EXPIRES LAST DAY OF: JULY 2016

OWNER OR OPERATOR (Co. #1988)

Mobile Pipe Lining and Coating, Inc.
13135 Danielson St., Suite 201
Poway, CA 92064

EQUIPMENT LOCATION (Fac. #1067)

Mobile Pipe Lining and Coating, Inc.
12766 Violet Road
Adelanto, CA 92301

Description:

OPEN ABRASIVE BLASTING SYSTEM - NO. 1 consisting of: One Kelco Abrasive Blasting Machine, model K1258 with 900 lbs capacity. Serial No. 12548.

CONDITIONS:

1. This equipment shall only be operated and maintained in strict accord with the manufacturer's recommendations.
2. Operation of this equipment shall be conducted in compliance with data and specifications submitted with the application under which this permit is issued unless otherwise noted below.
3. Emissions from this facility, including all stationary, portable and fugitive emissions, may not exceed the following emission limits:
 - (a) 250 pounds per day of Reactive Organic Gases, calculated and recorded, in average pounds per day, on a calendar month basis. [District Rule 1302 (C)(2)(a)]
 - (b) 250 pounds per day of Particulate Matter, calculated and recorded, in average pounds per day, on a calendar month basis. [District Rule 1302 (C)(2)(a)]
 - (c) 9.9 tons per year of a single Hazardous Air Pollutant (HAP) and/or 24.9 tons per year of any combined HAPs, calculated and recorded, in tons, on a calendar month basis and totaled for each consecutive twelve-month basis. The list of HAPs can be found in Section 112(b)(1) of the Federal Clean Air Act or at web site: <http://www.cpa.gov/tn/atw/188polls.html>. [District Rule 1320 (B)(3)(a) and 40 CFR 63 subpart A]

Fee Schedule: 7 (c)

Rating: 1 device

SIC: 3479

SCC: 30900201

Location/UTM(Km):
462E/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.

Mobile Pipe Lining and Coating, Inc.
13135 Danielson St., Suite 201
Poway, CA 92064

By:
Eldon Heaston
Air Pollution Control Officer

4. This open abrasive blasting system shall only be used when one or more of the following conditions are met:
(a) Steel or iron shot/grit is used exclusively;
(b) The item to be blasted exceeds 8 feet in any dimension; or
(c) The surface being blasted is situated at its permanent location or no further away from its permanent location than is necessary to allow the surface to be blasted.
[17 CCR 92500(b)]

5. Any open abrasive blasting conducted in accordance with (b) or (c) in condition 4 must use, exclusively:
(a) Abrasives certified for permissible dry outdoor blasting by the California Air Resources Board (CARB) pursuant to Title 17 CCR 92530;
(b) Wet abrasive blasting;
(c) Vacuum blasting; or,
(d) Hydroblasting or steel or iron shot/grit, if (b) or (c) is met in condition 4. Additionally, steel or iron shot/grit is the only abrasive allowed for (a) in condition 4. [17 CCR 92500(c)(4)]

6. This open abrasive blasting system must be operated such that no visible emissions from the equipment result in an opacity greater than 20 percent on the Ringelmann Chart for a period or periods aggregating more than three (3) minutes in any one hour. Compliance with this condition shall be demonstrated by weekly Visible Emission Determinations (VED) pursuant to the method described in condition 10, below, or by using USEPA Method 22, and USEPA Method 9, if necessary. The results of these VEDs shall be recorded and retained, for at least five (5) years, in a log made available to the District upon request.
[District Rule 401(a)]

7. This open abrasive blasting system must be operated such that no visible fugitive dust is visible in the atmosphere beyond the property line of this facility, verified by weekly Visible Emission Determinations (VED) when the equipment is in use. The monitoring method is as follows:
(a) Ensure that the observer's back is to the sun. Observe the property line for a period of one minute, and designate the emission point as "dusting" or "not dusting". If "dusting" is occurring, owner/operator must shut down the equipment immediately.
(b) A VED must be made at each property line to ensure compliance with this condition.
(c) VED date, location, and result must be recorded and retained, for at least five (5) years, in a log made available to the District upon request.
[District Rule 403(a) and 40 CFR 70.6 (a)(3)(B)]

8. A daily operations log shall be maintained on-site, for at least five (5) years, and made available to District personnel on request. This log shall contain, as a minimum, the following information:
(a) The permit number of the blaster used, the daily hours of operation for each blaster, and a brief description of each blasting project. These daily recordings shall be used to calculate the monthly PM emission rate in average pounds per day, pursuant to condition 3(b) (~~emission factors for PM from open blasting are 22 pounds of PM per hour, 16.45 pounds of PM10 per hour and 1.645 pounds of PM2.5 per hour.~~)
(b) The HAP emissions, calculated in tons, for each consecutive twelve month period to verify compliance with condition 3(c).
(c) The type of blasting media used and the CARB certification number, pursuant to condition 5.
(d) The weekly VEDs pursuant to condition 7.
[District Rule 1302 (C)(2)(a) and 40 CFR 70.6 (a)(3)(B)]

9. Pursuant to 40 CFR 63, Subpart HHHHHH National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, this facility shall not conduct any paint stripping operations on any substrate that use methylene chloride (MeCl)-containing paint stripping formulations. [40 CFR 63.11170(a)(1)]

10. Pursuant to 40 CFR 63, Subpart HHHHHH National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, this facility shall not spray apply coatings to metal and plastic surfaces that contain compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd). [40 CFR 63.11170(a)(3)]

11. Pursuant to 40 CFR 63, Subpart XXXXXX National Emission Standards for Hazardous Air Pollutants Area Source Standards

for Nine Metal Fabrication and Finishing Source Categories, this facility shall not be primarily engaged in the operations in one of the nine source categories listed below. Descriptions of these source categories are shown in Table 1 of this subpart. "Primarily engaged" is defined in 40 CFR 63.11522

- (a) Electrical and Electronic Equipment Finishing Operations;
 - (b) Fabricated Metal Products;
 - (c) Fabricated Plate Work (Boiler Shops);
 - (d) Fabricated Structural Metal Manufacturing;
 - (e) Heating Equipment, except Electric;
 - (f) Industrial Machinery and Equipment Finishing Operations;
 - (g) Iron and Steel Forging;
 - (h) Primary Metal Products Manufacturing; and
 - (i) Valves and Pipe Fittings.
- [40 CFR 63.11514(a)]

12. The facility must submit a Comprehensive Emissions Inventory Report (CEIR) to the District, in a format approved by the District, upon District request.
[District Rule 1302(C)(2)(a) and 40 CFR 51, Subpart A]

