
MOJAVE DESERT
AIR QUALITY MANAGEMENT DISTRICT

Statement of Basis
for
Surrender of

FOP Number:39701067
For:
Mobile Coating Solutions, Inc.

Facility Address:
12766 Violet Road
Adelanto, CA 92301

Document Date: April 5, 2022
Submittal date to EPA/CARB for review: April 5, 2022
EPA/CARB 45-day Commenting Period ends: May 20, 2022
Public Notice Posted: April 5, 2022
Public Commenting Period ends: May 5, 2022
Final Determination Issuance date: June 10, 2022

Permitting Engineer:
Roseana Brasington

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

A. Proposal

Mobile Pipe Lining and Coating (Mobile Pipe) located at 12766 Violet Road in Adelanto is a facility which cleans and coats steel pipe. Existing permitted equipment consists of:

- Five open abrasive blasting systems
- One Wheelabrator abrasive blast unit
- One pipe cleaning and application line
- One pipe coating and wrapping line
- One cement mortar batch plant
- Three dust collectors
- One high pressure water scrubber
- One open spray portable paint gun

The District received correspondence on November 10, 2021 that:

- Mobile Pipe Lining and Coating had been sold to a new owner Mobile Coating Solutions (MCS).
- The Responsible Official for MCS requested to surrender their Federal Operating Permit by electing to voluntarily limit facility emissions to the extent that the facility is no longer subject to the provisions of District Regulation XII – *Federal Operating Permits*, pursuant to the provisions of District Rule 221 – *Federal Operating Permit Requirement*, section B.

All of the existing Permit Units are under new ownership and the new owner (MCS) has applied to modify existing permits with enforceable emissions limitations to re-designate the facility as a synthetic minor source. These proposed emission limitations will effectively designate MCS as a synthetic minor source and will eliminate the Federal Operating Permit requirements for this facility.

A copy of the letter requesting to relinquish the Title V permit and copies of the proposed revised permits reflecting the Voluntary Emissions Limitations can be viewed in Appendix A.

MCS is currently defined as a federal Major Facility pursuant to District Rule 1201 – *Federal Operating Permit Definitions* as this source has a federally enforceable limit greater than the Major Facility thresholds for Volatile Organic Compounds (VOC) for a facility located inside the Federal Ozone Non-attainment Area (FONA). The facility pre-dates the district's NSR program and the facility's Potential to Emit of 45.6 tons/year for VOC and for PM₁₀ was grandfathered and still reflected on the facility's current permits. While the facility agrees to accept a less than 25 ton/year emissions limit on VOC, they want to retain the current facility PM₁₀ of 45.6 tons/year (already below the Federal Major source threshold for PM₁₀ which is 100 tpy). The new VOC emission limitation will classify MCS as a SM-80 source for VOC because the PTE is greater than 80% of the Title V threshold, and as such, will be federally reportable for VOC. The 45.6 ton/year PM₁₀ emissions limit is over the New Source Review offset threshold pursuant to Rule 1303(B); therefore, any PM₁₀ emission increases must be offset. The facility is an SM-80 source for HAP and will remain federally reportable for HAP as well. The facility will be a Federally Minor source for all other pollutants: PM₁₀, CO, and SO_x.

Pursuant to Section (C) of district Rule 221, this evaluation document and draft permits will be sent to USEPA and CARB for review and comment for a 45-day review period; and, the District will publish a Public Notice for a 30-day public commenting period that will include the following information:

1. The name and location of the Facility, including the name and address of the permit holder or applicant if different.
2. A statement that the Facility is applying for a Voluntary Emission Limitation.
3. The District name, address, telephone number and contact person from whom interested persons may obtain additional information.

A copy of this Public Notice is included in Appendix B.

B. Analysis

District Rule 221 – *Federal Operating Permit Requirement* specifies the requirements for obtaining Federal Operating Permits and the requirements to void applicability of Federal Operating Permit Requirements. Pursuant to Section B of this rule and Facility which would otherwise be subject to the provisions of Regulation XII – *Federal Operating Permits* may elect to voluntarily limit its emissions to the extent that the Facility is no longer subject to the provisions therein.

MCS requested to surrender their Federal Operating Permit by electing to voluntarily limit its emission to the extent that the facility is no longer subject to the provisions of District Regulation XII, pursuant to the provisions of District Rule 221, section B.

Pursuant to District Rule 221, section B, this facility has met all the following requirements:

- a. [Rule 221(B)(1)(a)(i)] - Applied for permit modifications for the appropriate permits for all permit units, as defined in District Rule 1201(V), under the provisions of District Regulation II and requested, in writing, a voluntary emission limitation of less than 25 tons per year of VOC which is below the Major Facility thresholds defined in District Rule 1201 for a facility located inside the FONA. All permit units that are to remain will have the voluntary emission limitation.
- b. [Rule 221(B)(1)(a)(ii)] - Included with their request for a voluntary emission limitation the facility identified and describe all sources of emissions at the Facility, including all permit units as defined in District Rule 1201(V) and all equipment not requiring a permit pursuant to District Rule 219. Please refer to the table above for a summary of the Permit Units and the corresponding action.
- c. [Rule 221(B)(1)(a)(iii)] - Identifying the fugitive emissions of Hazardous Air Pollutants, as defined in District Rule 1201(R), was not required since this facility is not included on the list of categories that are required to report fugitives Fugitive emissions pursuant to 40 CFR 70.2 Major Source (2). However, HAP is reported by this facility on an annual basis to satisfy the requirements of the AB2588 Hot Spots Program and the actual emissions of HAP at this facility are

below the thresholds of the Major Facility thresholds defined in District Rule 1201 for a facility located inside the FONA. A summary of the facility's most recently approved HAP emission submission (emission year 2019 and 2020) is included in the appendix.

- d. [Rule 221(B)(1)(a)(iv)] - The District referenced the facility's most recently approved submitted Emission Inventory data (emission years 2019 and 2020) that represents a calculation of annual actual emissions from the sources of emissions identified at this facility. A summary of this data is attached to this evaluation and confirms that actual emissions associated with this facility are below the Major Facility thresholds defined in District Rule 1201 for a facility located inside the FONA for all pollutants; and, are below the voluntary emission limitations of less than 25 tons per year of VOC. All other Air Pollutants will be limited to below the Major Facility thresholds defined in District Rule 1201 for a facility located inside the FONA.
- e. [Rule 221(B)(1)(a)(v)] - The District has modified all the local air permits with permit conditions that limit emissions at this facility, to a level below that of a Major Facility as defined in District Rule 1201 for all Air Pollutants. Copies of these permits are attached to this evaluation in the appendix.

A summary of the Major Facility Thresholds and the current and proposed emission limits is shown below.

Air Pollutant	Major Facility Threshold within FONA (tpy)	Current Emission Limitations (tpy)	New Emission Limitations (tpy)
NOx ²	≥25	none	n/a
VOC ¹	≥25	45.6	<25.0
CO ²	≥100	none	n/a
SOx ²	≥100	none	n/a
PM ₁₀ ²	≥100	45.6	45.6
single HAP ³	≥10	9.9	<10.0
combined HAP ³	≥25	24.9	<25.0

Foot notes:

1. VOC is the only Air Pollutant that requires a federally enforceable voluntarily emissions limitation to surrender the Title V permit. The proposed limit makes the facility an SM-80 source for VOC and they will still be federally reportable for that pollutant.
2. No voluntary emission limitations required as the Potential to Emit for these pollutants are below 50 percent of the Major Facility (Title V) thresholds.
3. The proposed limits for HAP keep the facility an SM-80 source for HAP and they will still be federally reportable for that HAP.

C. Comment Period and Notifications

1. Public Comment

This preliminary determination will be publicly noticed on April 5, 2022, allowing for public comment until May 5, 2022. Please see Appendix B for noticing details.

2. Notifications

This evaluation document and proposed permits were submitted to USEPA and CARB pursuant for a forty-five (45) day review period on or before April 5, 2022. The final determination shall be issued on or about June 10, 2022 and the FOP will be retired at that time.

All correspondence were forwarded to electronically to the following recipients:

Director, Office of Air Division
United States EPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105
Via the EPS Portal

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

Andy Sterling
General Manager
Mobile Coating Solutions, Inc.
12766 Violet Road
Adelanto, CA 92301
asterling@mobilepipe.net

D. Conclusion

After the USEPA and CARB commenting period ends; and, after the Public commenting periods end, provided that no comments are received that cause a revision to this proposal, the District recommends issuing the proposed local permits as proposed and formally closing the associated Federal Operating Permit. The proposed draft permits are in Appendix D.

Appendix A
Request to Cancel Federal Operating Permit



State Pipe & Supply Co.

183 S.Cedar Ave. Rialto Ca. 92376 909.877.9999

1/18/2022

Roseana Brasington
Mojave Desert Air Quality Management District
14306 Park Ave
Victorville Ca. 92392

Re: Request for Title V Exit
Project 200501.0188

Facility: Mobile Coating Solutions Inc.
12766 Violet Rd.
Rialto Ca. 92301
Facility ID 01067

Dear Roseana:

Mobile Coating Solutions Inc. is requesting to exit the Title V program for Volatile Organic Compounds (VOC) and become categorized as a minor source. Consequently, the facility will accept a permit condition that limits the facility's potential to emit below the offset threshold of 25 tons of VOC per year as specified under rule 1303.

Sincerely,

Greg Evans
Regional Operations Manager
562-209-8774
grege@statepipe.com

Appendix B

Public Notice

Noticing Methods include the following, per District Rule 1207 (A)(1)(a) and District Rule 1302(D)(2)and(3):

- 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:
<http://www.mdaqmd.ca.gov/permitting/public-notices-advisories/public-notices-permitting-regulated-industry>

NOTICE OF VOLUNTARY EMISSION LIMITATION (TITLE V SYNTHETIC MINOR STATUS)

NOTICE IS HEREBY GIVEN THAT Mobile Coating Solutions, Inc., located at 12766 Violet Road, Adelanto, CA within the jurisdiction of the Mojave Desert Air Quality Management District (MDAQMD) has applied for a Voluntary Emission Limitation (VEL) pursuant to the provisions of MDAQMD Rule 221. Applicant is a company that cleans and coats steel pipe and has a potential to emit which would subject it to the provisions of Title V of the Federal Clean Air Act pursuant to MDAQMD Regulation XII. The applicant has agreed to accept conditions on its existing MDAQMD permits, which will limit its potential to emit to an amount below both the Title V major source and the Title V synthetic minor thresholds.

REQUEST FOR COMMENTS: Interested persons are invited to submit written comments and/or other documents regarding the terms and conditions of the proposed VEL and the proposed issuance of MDAQMD permits containing conditions to impose such a limitation. If you submit written comments, you may also request a public hearing on the proposed renewal 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 May 5, 2022 to the MDAQMD, Attention: Roseana Navarro-Brasington, Air Quality Engineer 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 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 Roseana Navarro-Brasington, Air Quality Engineer at the address, above, or (760) 245-1661, extension 5706, or at rnbrasington@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
Permit Engineering Manager
Mojave Desert Air Quality Management District

14306 Park Avenue
Victorville, CA

Appendix C
Emissions Inventory Data – Emission Years 2019 and 2020

File name: C:\Users\roseanan\Desktop\Title V WORKING\Mobile Pipe Significant Modification June 2021\RNB working worksheets\HARP 19 and 20.rtf

HARP Facility Emission Summary

HARP EIM Version: 2.1.2

Project Path: C:\HARP2\HARP2\CEI\2018CEIRNE
 Project Database: C:\HARP2\HARP2\CEI\2018CEIRNE\2019CEIRNE.mdb
 CEIDARS Utility Database: C:\HARP2\Tables\CEIDARSTables072020.mdb
 Facility List: N/A
 Pollutant List: N/A
 Sorting Order: FACID, CO, AB, DIS, YEAR, TOXAPPEN, POLABREV
 Date Created: 3/23/2022 8:52:50 AM
 Operator:

(Note: Emissions in LBS/YR for toxics, TONS/YR for criteria pollutants, CURRIES/YR for radio nuclides. * User defined pollutants are marked by an asterisk with the pollutant ID.)

FACILITY	NAME	FSIC					
	ADDRESS						
	CITY	ZIP CO AB	DIS	CATEGORY	HAP	POLLUTANT	POLLUTANT ID EMISSIONS YEAR
1067	MOBILE PIPE LINING AND COATIN	3479					
	12766 VIOLET ROAD						
	ADELANTO	92301 36 MD	MOJ			Propyleneglycol	57556 443.160 2019
			A-I			1,2,4TriMeBenze	95636 914.706 2019
			A-I			Alumin Oxide	1344281 2274.239 2019
			A-I			Aluminum	7429905 32.872 2019
			A-I			ButylBenzPhthal	85687 0.0 2019
			A-I			CarbonBlackExtr	1050 75.676 2019
			A-I			Copper	7440508 20.219 2019
			A-I			DPGME	34590948 0.0 2019
			A-I			Isopropyl Alcoh	67630 247.826 2019
			A-I			n-Butyl Alcohol	71363 786.246 2019
			A-I			PGME	107982 338.382 2019
			A-I			PGMEA	108656 169.787 2019
			A-I			sec-Butyl Alcoh	78922 42.116 2019
			A-I			Silica, Crystln	1175 18.782 2019
			A-I			Talc w/asbest	1190 412.253 2019
			A-I			t-Butyl acetate	540885 16.343 2019
			A-I			TriMeBenzns	25551137 291.967 2019
			A-I			Vanadium	7440622 1.243 2019
			A-I			Zinc	7440666 198.071 2019
			A-I			Zinc Oxide	1314132 2.780 2019
			A-I	Y		4,4'IsoprDiPhen	80057 0.0 2019
			A-I	Y		Arsenic	7440382 1.243 2019
			A-I	Y		Benzene	71432 125.034 2019
			A-I	Y		Beryllium	7440417 0.0 2019
			A-I	Y		Cadmium	7440439 0.0 2019
			A-I	Y		CCl4	56235 0.418 2019
			A-I	Y		Chromium	7440473 15.559 2019
			A-I	Y		Cobalt	7440484 1.243 2019
			A-I	Y		Cr(VI)	18540299 3.421E-03 2019
			A-I	Y		Cumene	98828 1.282 2019
			A-I	Y		EGRE	111762 8.834 2019
			A-I	Y		Ethyl Benzene	100414 1349.487 2019
			A-I	Y		HCl	7647010 0.0 2019

A-I	Y	HexaMeDiisocyan	822060	14.110	2019
A-I	Y	Lead	7439921	0.526	2019
A-I	Y	Manganese	7439965	569.513	2019
A-I	Y	MeDiphenDiisocy	101688	29.569	2019
A-I	Y	MEK	78933	4841.752	2019
A-I	Y	Mercury	7439976	0.0	2019
A-I	Y	Methanol	67561	119.208	2019
A-I	Y	Methylene Chlor	75092	267.307	2019
A-I	Y	MTBK	108101	481.114	2019
A-I	Y	Naphthalene	91203	6.603	2019
A-I	Y	Nickel	7440020	6.224	2019
A-I	Y	Phenol	108952	944.400	2019
A-I	Y	Phosphorus	7723140	6.224	2019
A-I	Y	Selenium	7782492	0.0	2019
A-I	Y	Toluene	108883	3093.866	2019
A-I	Y	TriPhPhosphite	101020	8.149	2019
A-I	Y	Xylenes	1330207	5581.485	2019
A-II	Y	Coal tars	8007452	152.229	2019
CRIT		PM	11101	41.634	2019
CRIT		PM10	85101	30.627	2019
CRIT		PM10-FIL	85105	30.627	2019
CRIT		PM2.5	88101	12.247	2019
CRIT		PM25-FIL	88105	12.247	2019
CRIT		PM-FIL	11105	41.634	2019
CRIT		ROG	16113	9.244	2019
CRIT		TOG	43101	13.231	2019
CRIT		VOC	43104	9.244	2019
CRIT		PM	11101	23.989	2020
CRIT		PM10	85101	15.483	2020
CRIT		PM10-FIL	85105	15.483	2020
CRIT		PM2.5	88101	6.987	2020
CRIT		PM25-FIL	88105	6.987	2020
CRIT		PM-FIL	11105	23.989	2020
CRIT		ROG	16113	5.020	2020
CRIT		TOG	43101	7.188	2020
CRIT		VOC	43104	5.020	2020

Appendix D

Proposed Permits



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 2022

OWNER OR OPERATOR (Co. #2762)

Mobile Coating Solutions Inc.
12766 Violet Rd.
Adelanto, CA 92301

EQUIPMENT LOCATION (Fac. #1067)

Mobile Coating Solutions
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.
[District Rule 1302(C)(2)(a)]
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.
[District Rule 1302(C)(2)(a)]
3. 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.

Fee Schedule: 7 (e)

Rating: 1 device

SIC: 3479

SCC: 30900201

Location/Coordinates:
+34.56319, -117.38447

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 Coating Solutions Inc.
12766 Violet Rd.
Adelanto, CA 92301

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

[17 CCR 92500(b)]

4. 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)]

5. 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)]

6. 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)]

7. 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).
- (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)]

8. 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)]

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 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)]

10. 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)]

11. Emissions from this facility shall be less than the following:

- a. 45.6 tons per year of PM10
- b. 25.0 tons per year of VOC
- f. 10.0 tons per year for any single HAP and 25.0 tons per year for any combination of HAPs calculated on a rolling twelve-month basis. HAPs are defined in 40 CFR 61.01 and are the chemical compounds listed in section 112(b) of the Clean Air Act (Act).

Compliance with the annual emission limits shall be demonstrated via 12 month rolling sum for VOC and via emission inventory reports for PM10 and HAP.

At the end of each calendar month, the operator shall total VOC emissions for the calendar month and for the previous 12 calendar month period from all equipment and operations at the facility that are required to have written permits or are exempt from written permits pursuant to Rule 219 but emit air contaminants greater than 10% of the applicable Major Source Threshold. If total VOC emissions for the 12 calendar month period exceed the emission cap specified above, the operator will be subject to Title V and shall submit a Title V Permit application no later than 12 months after the exceedance.

[District Rules 1303 - Offsets, 1201 - Definitions, 1202 - Applications]

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]



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

A002433

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 2022

OWNER OR OPERATOR (Co. #2762)

Mobile Coating Solutions Inc.
12766 Violet Rd.
Adelanto, CA 92301

EQUIPMENT LOCATION (Fac. #1067)

Mobile Coating Solutions
12766 Violet Road
Adelanto, CA 92301

Description:

OPEN ABRASIVE BLASTING SYSTEM - NO. 2 consisting of: One Kelco Abrasive Blasting Pot, model K125 with 900 lbs capacity. Serial No. 12544.

CONDITIONS:

1. This equipment shall only be operated and maintained in strict accord with the manufacturer's recommendations. [District Rule 1302(C)(2)(a)]
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. [District Rule 1302(C)(2)(a)]
3. 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)]

Fee Schedule: 7 (e)

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 Coating Solutions Inc.
12766 Violet Rd.
Adelanto, CA 92301

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

4. 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)]

5. 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)]

6. 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)]

7. 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).
(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)]

8. 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)]

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 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)]

10. 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)]

11. Emissions from this facility shall be less than the following:
a. 45.6 tons per year of PM10
b. 25.0 tons per year of VOC
f. 10.0 tons per year for any single HAP and 25.0 tons per year for any combination of HAPs calculated on a rolling twelve-month basis. HAPs are defined in 40 CFR 61.01 and are the chemical compounds listed in section 112(b) of the Clean Air Act (Act).

Compliance with the annual emission limits shall be demonstrated via 12 month rolling sum for VOC and via emission inventory reports for PM10 and HAP.

At the end of each calendar month, the operator shall total VOC emissions for the calendar month and for the previous 12 calendar month period from all equipment and operations at the facility that are required to have written permits or are exempt from written permits pursuant to Rule 219 but emit air contaminants greater than 10% of the applicable Major Source Threshold. If total VOC emissions for the 12 calendar month period exceed the emission cap specified above, the operator will be subject to Title V and shall submit a Title V Permit application no later than 12 months after the exceedance.
[District Rules 1303 - Offsets, 1201 - Definitions, 1202 - Applications]

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]



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

A002434

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 2022

OWNER OR OPERATOR (Co. #2762)

Mobile Coating Solutions Inc.
12766 Violet Rd.
Adelanto, CA 92301

EQUIPMENT LOCATION (Fac. #1067)

Mobile Coating Solutions
12766 Violet Road
Adelanto, CA 92301

Description:

OPEN ABRASIVE BLASTING SYSTEM - NO. 5 consisting of: One union Oil Abrasive Blasting Pot, with 1,000 lbs capacity.
Serial No. 150.

CONDITIONS:

1. This equipment shall only be operated and maintained in strict accord with the manufacturer's recommendations. [District Rule 1302(C)(2)(a)]
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. [District Rule 1302(C)(2)(a)]
3. 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)]

Fee Schedule: 7 (e)

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 Coating Solutions Inc.
12766 Violet Rd.
Adelanto, CA 92301

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

4. 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)]

5. 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)]

6. 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)]

7. 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).
- (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)]

8. 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)]

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 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)]

10. 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)]

11. Emissions from this facility shall be less than the following:
a. 45.6 tons per year of PM10
b. 25.0 tons per year of VOC
f. 10.0 tons per year for any single HAP and 25.0 tons per year for any combination of HAPs calculated on a rolling twelve-month basis. HAPs are defined in 40 CFR 61.01 and are the chemical compounds listed in section 112(b) of the Clean Air Act (Act).

Compliance with the annual emission limits shall be demonstrated via 12 month rolling sum for VOC and via emission inventory reports for PM10 and HAP.

At the end of each calendar month, the operator shall total VOC emissions for the calendar month and for the previous 12 calendar month period from all equipment and operations at the facility that are required to have written permits or are exempt from written permits pursuant to Rule 219 but emit air contaminants greater than 10% of the applicable Major Source Threshold. If total VOC emissions for the 12 calendar month period exceed the emission cap specified above, the operator will be subject to Title V and shall submit a Title V Permit application no later than 12 months after the exceedance.
[District Rules 1303 - Offsets, 1201 - Definitions, 1202 - Applications]

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]



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

A002435

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 2022

OWNER OR OPERATOR (Co. #2762)

Mobile Coating Solutions Inc.
12766 Violet Rd.
Adelanto, CA 92301

EQUIPMENT LOCATION (Fac. #1067)

Mobile Coating Solutions
12766 Violet Road
Adelanto, CA 92301

Description:

OPEN ABRASIVE BLASTING SYSTEM - NO. 4 consisting of: One Kelco Abrasive Blasting Pot, model K130 with 1,600 lbs capacity. Serial No. 10884.

CONDITIONS:

1. This equipment shall only be operated and maintained in strict accord with the manufacturer's recommendations.
[District Rule 1302(C)(2)(a)]
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.
[District Rule 1302(C)(2)(a)]
3. 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.

Fee Schedule: 7 (e)

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 Coating Solutions Inc.
12766 Violet Rd.
Adelanto, CA 92301

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

[17 CCR 92500(b)]

4. 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)]

5. 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)]

6. 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)]

7. 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).
- (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)]

8. 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)]

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 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)]

10. 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)]

11. Emissions from this facility shall be less than the following:

- a. 45.6 tons per year of PM10
- b. 25.0 tons per year of VOC
- f. 10.0 tons per year for any single HAP and 25.0 tons per year for any combination of HAPs calculated on a rolling twelve-month basis. HAPs are defined in 40 CFR 61.01 and are the chemical compounds listed in section 112(b) of the Clean Air Act (Act).

Compliance with the annual emission limits shall be demonstrated via 12 month rolling sum for VOC and via emission inventory reports for PM10 and HAP.

At the end of each calendar month, the operator shall total VOC emissions for the calendar month and for the previous 12 calendar month period from all equipment and operations at the facility that are required to have written permits or are exempt from written permits pursuant to Rule 219 but emit air contaminants greater than 10% of the applicable Major Source Threshold. If total VOC emissions for the 12 calendar month period exceed the emission cap specified above, the operator will be subject to Title V and shall submit a Title V Permit application no later than 12 months after the exceedance.

[District Rules 1303 - Offsets, 1201 - Definitions, 1202 - Applications]

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]



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

A002436

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 2022

OWNER OR OPERATOR (Co. #2762)

Mobile Coating Solutions Inc.
12766 Violet Rd.
Adelanto, CA 92301

EQUIPMENT LOCATION (Fac. #1067)

Mobile Coating Solutions
12766 Violet Road
Adelanto, CA 92301

Description:

OPEN ABRASIVE BLASTING SYSTEM - NO. 3 consisting of: One Kelco Abrasive Blasting Pot, model K125 with 900 lbs capacity. Serial No. 4983.

CONDITIONS:

1. This equipment shall only be operated and maintained in strict accord with the manufacturer's recommendations.
[District Rule 1302(C)(2)(a)]
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.
[District Rule 1302(C)(2)(a)]
3. 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.

Fee Schedule: 7 (e)

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 Coating Solutions Inc.
12766 Violet Rd.
Adelanto, CA 92301

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

[17 CCR 92500(b)]

4. 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)]

5. 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)]

6. 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)]

7. 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).
- (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)]

8. 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)]

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 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)]

10. 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)]

11. Emissions from this facility shall be less than the following:

- a. 45.6 tons per year of PM10
- b. 25.0 tons per year of VOC
- f. 10.0 tons per year for any single HAP and 25.0 tons per year for any combination of HAPs calculated on a rolling twelve-month basis. HAPs are defined in 40 CFR 61.01 and are the chemical compounds listed in section 112(b) of the Clean Air Act (Act).

Compliance with the annual emission limits shall be demonstrated via 12 month rolling sum for VOC and via emission inventory reports for PM10 and HAP.

At the end of each calendar month, the operator shall total VOC emissions for the calendar month and for the previous 12 calendar month period from all equipment and operations at the facility that are required to have written permits or are exempt from written permits pursuant to Rule 219 but emit air contaminants greater than 10% of the applicable Major Source Threshold. If total VOC emissions for the 12 calendar month period exceed the emission cap specified above, the operator will be subject to Title V and shall submit a Title V Permit application no later than 12 months after the exceedance.

[District Rules 1303 - Offsets, 1201 - Definitions, 1202 - Applications]

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]



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

A012781

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 2022

OWNER OR OPERATOR (Co. #2762)

Mobile Coating Solutions Inc.
12766 Violet Rd.
Adelanto, CA 92301

EQUIPMENT LOCATION (Fac. #1067)

Mobile Coating Solutions
12766 Violet Road
Adelanto, CA 92301

Description:

WHEEL BLAST EQUIPMENT consisting of: Wheelabrator LE RC 4 Shot Blast Machine

CONDITIONS:

1. This equipment shall be installed, operated and maintained in strict accord with those recommendations of the manufacturer/supplier and/or sound engineering principles which produce the minimum emissions of contaminants.
[District Rule 204]
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.
[District Rule 204]
3. This equipment shall not be operated unless vented to air pollution control equipment operating under valid District permit C012782.
[District Rules 1302 and 1303]
4. This unit shall only use steel shot abrasive media exempt from certification requirements of the California Air Resources Board

Fee Schedule: 7 (e)

Rating: 1 device

SIC: 3479

SCC: 30900201

Location/Coordinates:
+34.56159, -117.38621

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 Coating Solutions Inc.
12766 Violet Rd.
Adelanto, CA 92301

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

(CARB).

[District Rules 1302 and 1303] District and State Applicability only.

5. This 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 6, 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)]

6. This 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)]

7. 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 date of use and the hours operated that day
- (b) PM emissions associated with the operation of this equipment which shall be incorporated into the calculation of facilitywide average lb/day PM emissions pursuant to permit condition 7.
- (c) The HAP emissions, calculated in tons, for each consecutive twelve month period to verify compliance with condition 7.
- (e) The weekly VEDs pursuant to condition 6.

[District Rule 1302 (C)(2)(a) and 40 CFR 70.6 (a)(3)(B)]

8. Emissions from this facility shall be less than the following:

- a. 45.6 tons per year of PM10
- b. 25.0 tons per year of VOC
- f. 10.0 tons per year for any single HAP and 25.0 tons per year for any combination of HAPs calculated on a rolling twelve-month basis. HAPs are defined in 40 CFR 61.01 and are the chemical compounds listed in section 112(b) of the Clean Air Act (Act).

Compliance with the annual emission limits shall be demonstrated via 12 month rolling sum for VOC and via emission inventory reports for PM10 and HAP.

At the end of each calendar month, the operator shall total VOC emissions for the calendar month and for the previous 12 calendar month period from all equipment and operations at the facility that are required to have written permits or are exempt from written permits pursuant to Rule 219 but emit air contaminants greater than 10% of the applicable Major Source Threshold. If total VOC emissions for the 12 calendar month period exceed the emission cap specified above, the operator will be subject to Title V and shall submit a Title V Permit application no later than 12 months after the exceedance.

[District Rules 1303 - Offsets, 1201 - Definitions, 1202 - Applications]

9. The facility must submit accurate emissions inventory data to the District, in a format approved by the District, on a yearly basis, which is to be received by the District no later than April 30 of each year.

[District Rule 107(b); H&S Code 39607 & 44341-44342; and 40 CFR 51, Subpart A]



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

B002427

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 2022

OWNER OR OPERATOR (Co. #2762)

Mobile Coating Solutions Inc.
12766 Violet Rd.
Adelanto, CA 92301

EQUIPMENT LOCATION (Fac. #1067)

Mobile Coating Solutions
12766 Violet Road
Adelanto, CA 92301

Description:

PIPE CLEANING AND APPLICATION LINE consisting of: Pre-heater system with sixteen (16), exempt, natural gas burner heads rated at 9,800 BTU each for a total of 0.157 million BTU/hr, one abrasive blast/shot-cleaning machine, and one primer reservoir assembly and adjustable double squeegee system.

CONDITIONS:

1. This equipment shall only be operated and maintained in strict accord with the manufacturer's recommendations.
[District Rule 1302(C)(2)(a)]
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.
[District Rule 1302(C)(2)(a)]
3. This equipment shall not be operated unless vented to air pollution control equipment operating under valid District permit C002428.
[District Rule 1303(A)]

Fee Schedule: 7 (I)

Rating: 1 device

SIC: 3479

SCC: 30901699

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 Coating Solutions Inc.
12766 Violet Rd.
Adelanto, CA 92301

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

4. 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 daily hours of operation for the entire system. 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 blasting associated with this equipment are 22 pounds of PM per hour, 16.45 pounds of PM10 per hour and 1.645 pounds of PM2.5 per hour. At 99.9% control efficiency of the associated air pollution control device (C002428) the controlled emission factors are 0.022, 0.0164 and 0.0016 pounds per hour, respectively).
- (b) The amount of coatings, linings, and solvents applied in gallons per day and the corresponding VOC content in pounds of VOC per gallon. These daily recordings shall be used to calculate the monthly ROG emission rate in average pounds per day, pursuant to condition 3(a).
- (c) The HAP emissions, calculated in tons, for each consecutive twelve month period to verify compliance with condition 3(c).
- (d) The annual hours of operation of the heating burners (for CEIR purposes).

[District Rule 1302 (C)(2)(a), 40 CFR 70.6 (a)(3)(B)]

5. 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)]

6. 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)]

7. 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)]

8. Emissions from this facility shall be less than the following:

- a. 45.6 tons per year of PM10
- b. 25.0 tons per year of VOC
- f. 10.0 tons per year for any single HAP and 25.0 tons per year for any combination of HAPs calculated on a rolling twelve-month basis. HAPs are defined in 40 CFR 61.01 and are the chemical compounds listed in section 112(b) of the Clean Air Act (Act).

Compliance with the annual emission limits shall be demonstrated via 12 month rolling sum for VOC and via emission inventory reports for PM10 and HAP.

At the end of each calendar month, the operator shall total VOC emissions for the calendar month and for the previous 12 calendar month period from all equipment and operations at the facility that are required to have written permits or are exempt from written permits pursuant to Rule 219 but emit air contaminants greater than 10% of the applicable Major Source Threshold. If total VOC emissions for the 12 calendar month period exceed the emission cap specified above, the operator will be subject to Title V and shall submit a Title V Permit application no later than 12 months after the exceedance.

[District Rules 1303 - Offsets, 1201 - Definitions, 1202 - Applications]

9. 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]

DRAFT



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

B002429

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 2022

OWNER OR OPERATOR (Co. #2762)

Mobile Coating Solutions Inc.
12766 Violet Rd.
Adelanto, CA 92301

EQUIPMENT LOCATION (Fac. #1067)

Mobile Coating Solutions
12766 Violet Road
Adelanto, CA 92301

Description:

PIPE COATING AND WRAPPING LINE consisting of: Pre-heater system with twenty-five (25), exempt, natural gas burner heads rated at 9,800 BTU each for a total of 0.245 MMBTU/hr, one CL-MPHT-5000 Hot Enamel Holding Tank, and one CL-MPCM-36 Coal Tar Coat & Wrap Machine.

CONDITIONS:

1. This equipment shall only be operated and maintained in strict accord with manufacturer's recommendations.
[District Rule 1302(C)(2)(a)]
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.
[District Rule 1302(C)(2)(a)]
3. This equipment shall not apply coal tar unless vented to air pollution control equipment operating under valid District permit C002430.
[District Rule 1303(B)]

Fee Schedule: 7 (I)

Rating: 1 device

SIC: 3479

SCC: 30901603

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 Coating Solutions Inc.
12766 Violet Rd.
Adelanto, CA 92301

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

4. 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 amount of adhesive and coal tar applied per day in gallons and the corresponding VOC content in pounds VOC per gallon. These daily recordings shall be used to calculate the monthly VOC emission rate in average pounds per day, pursuant to condition 3(a).
- (b) The HAP emissions, calculated in tons, for each consecutive twelve month period to verify compliance with condition 3(c).
- (c) The annual hours of operation of the heating burners (for CEIR purposes).

[District Rule 1302 (C)(2)(a), 40 CFR 70.6 (a)(3)(B)]

5. 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)]

6. 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)]

7. 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)]

8. Emissions from this facility shall be less than the following:

- a. 45.6 tons per year of PM10
- b. 25.0 tons per year of VOC
- f. 10.0 tons per year for any single HAP and 25.0 tons per year for any combination of HAPs calculated on a rolling twelve-month basis. HAPs are defined in 40 CFR 61.01 and are the chemical compounds listed in section 112(b) of the Clean Air Act (Act).

Compliance with the annual emission limits shall be demonstrated via 12 month rolling sum for VOC and via emission inventory reports for PM10 and HAP.

At the end of each calendar month, the operator shall total VOC emissions for the calendar month and for the previous 12 calendar month period from all equipment and operations at the facility that are required to have written permits or are exempt from written permits pursuant to Rule 219 but emit air contaminants greater than 10% of the applicable Major Source Threshold. If total VOC emissions for the 12 calendar month period exceed the emission cap specified above, the operator will be subject to Title V and shall submit a Title V Permit application no later than 12 months after the exceedance.

[District Rules 1303 - Offsets, 1201 - Definitions, 1202 - Applications]

9. 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]



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

B007998

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 2022

OWNER OR OPERATOR (Co. #2762)

Mobile Coating Solutions Inc.
12766 Violet Rd.
Adelanto, CA 92301

EQUIPMENT LOCATION (Fac. #1067)

Mobile Coating Solutions
12766 Violet Road
Adelanto, CA 92301

Description:

CEMENT MORTAR BATCH PLANT consisting of: Serving a cement mortar lining machine with the following equipment (note that the pipe spinner and mortar blower are not subject to permitting):

EQUIPMENT

Capacity	Equipment Description
5	Cement mortar mixer
3	Drive motor
10	Pump motor
0	Sand hopper, w/ 30,000 lb scale
0	Cement silo, 70,000 lb capacity, w/bin vent dust collector
5	24" x 24' belt conveyor
0	Cement silo, 800 cubic ft, w/bin vent
0	Cement silo, 800 cubic ft, w/bin vent
0	Cement silo, 1,500 cubic ft, w/dust collector (C012493)

CONDITIONS:

1. This equipment shall only be operated and maintained in strict accord with manufacturer's recommendations.[District Rule

Fee Schedule: 1 (a)

Rating: 23 bhp

SIC: 3479

SCC: 30501112

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 Coating Solutions Inc.
12766 Violet Rd.
Adelanto, CA 92301

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

1303(A)]

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. [District Rule 1303(A)]

3. Materials processed shall contain sufficient natural and/or added moisture to ensure compliance with District rules, such as, but not limited to, 401, 402, and 403. Sufficient water and equipment to properly wet the material being processed shall be maintained in operable condition and used as necessary to ensure compliance.
[District Regulation IV]

4. The associated bin vents and dust collector must be operated and maintained to ensure compliance with those rules stated in Condition 4.
[District Rules 204, 1303 and Regulation IV]

5. 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 daily amount of cement and sand used in the cement mortar batch plant shall be recorded in pounds. 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 the cement mortar batch plant are 2.118E-05 pounds of PM per pound of wet mix material, 9.761E-06 pounds of PM10 per pound of wet mix material and 9.731E-07 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).
[District Rule 1302 (C)(2)(a), 40 CFR 70.6 (a)(3)(B)]

6. 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)]

7. 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)]

8. 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)]

9. Emissions from this facility shall be less than the following:
a. 45.6 tons per year of PM10
b. 25.0 tons per year of VOC
f. 10.0 tons per year for any single HAP and 25.0 tons per year for any combination of HAPs calculated on a rolling twelve-month

basis. HAPs are defined in 40 CFR 61.01 and are the chemical compounds listed in section 112(b) of the Clean Air Act (Act).

Compliance with the annual emission limits shall be demonstrated via 12 month rolling sum for VOC and via emission inventory reports for PM10 and HAP.

At the end of each calendar month, the operator shall total VOC emissions for the calendar month and for the previous 12 calendar month period from all equipment and operations at the facility that are required to have written permits or are exempt from written permits pursuant to Rule 219 but emit air contaminants greater than 10% of the applicable Major Source Threshold. If total VOC emissions for the 12 calendar month period exceed the emission cap specified above, the operator will be subject to Title V and shall submit a Title V Permit application no later than 12 months after the exceedance.

[District Rules 1303 - Offsets, 1201 - Definitions, 1202 - Applications]

10. 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]

DRAFT



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

C002428

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 2022

OWNER OR OPERATOR (Co. #2762)

Mobile Coating Solutions Inc.
12766 Violet Rd.
Adelanto, CA 92301

EQUIPMENT LOCATION (Fac. #1067)

Mobile Coating Solutions
12766 Violet Road
Adelanto, CA 92301

Description:

DUST COLLECTOR SYSTEM consisting of: A Center Line Equipment dust collector, venting the Abrasive Blast Cleaning Machine for the Pipe Cleaning and Application Line under B002427.

Manufacturer: Center Line Equipment
Model No.: CPJ-44-DC
No. of Bags: 16
Type of Cloth: Resin Impregnated Cellulose Fibers
A/C Ratio: 1.4:10
Horsepower: 10

CONDITIONS:

1. This equipment shall only be operated and maintained in strict accord with manufacturer's recommendations.
[District Rule 1302(C)(2)(a)]

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

Fee Schedule: 7 (h)

Rating: 1 device

SIC: 3479

SCC: 30901699

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 Coating Solutions Inc.
12766 Violet Rd.
Adelanto, CA 92301

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

3. This equipment shall be operated when the Pipe Cleaning and Application Line (B002427) is operating.
[District Rule 1303(A)]

4. The owner/operator shall have on-site at all times, a minimum inventory of replacement filters to maintain compliance with these conditions at all times.
[District Rule 1302(C)(2)(a)]

5. This air pollution control device shall be equipped with a differential pressure gauge, which shall be maintained between 1 and 7 inches of water column during operation.
[District Rule 1303(A)]

6. This air pollution control device 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 monthly Visible Emission Determinations (VED) using USEPA Method 22, and USEPA Method 9, if necessary, pursuant to condition 7, below.
[District Rule 401(a)]

7. The owner/operator must conduct a minimum program of inspection and maintenance on this equipment inclusive of the following:
(a) Each day this unit is operated the pressure drop reading shall be recorded in inches of water column.
(b) Once a week a calibration check on the pressure gauge must be recorded by checking for a 'zero reading' before the unit is in operation.
(c) A monthly Visible Emission Determination (VED) and result must be recorded using the following procedures: Ensure that the observer's back is to the sun or artificial light, the observation spot provides a clear view of the emission point(s), observe the emission point(s) for a period of one minute, and designate the emission point(s) as "dusting" or "not dusting". If "dusting" is occurring, owner/operator must conduct a Visible Emission Evaluation using USEPA Method 22, and USEPA Method 9, on each dusting emission point if necessary, or shut down the equipment immediately; and,
(d) Quarterly bag/filter and bag/filter suspension system inspections.
[District Rule 1302 (C)(2)(a), 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 daily operating pressure drop readings and dates;
(b) The weekly 'zero reading' calibration dates;
(c) The monthly VDE dates, locations, and results; and,
(d) The dates and results of the quarterly bag/filter and bag/filter suspension system inspections.
[District Rule 1302 (C)(2)(a), 40 CFR 70.6 (a)(3)(B)]

9. Emissions from this facility shall be less than the following:
a. 45.6 tons per year of PM10
b. 25.0 tons per year of VOC
f. 10.0 tons per year for any single HAP and 25.0 tons per year for any combination of HAPs calculated on a rolling twelve-month basis. HAPs are defined in 40 CFR 61.01 and are the chemical compounds listed in section 112(b) of the Clean Air Act (Act).

Compliance with the annual emission limits shall be demonstrated via 12 month rolling sum for VOC and via emission inventory reports for PM10 and HAP.

At the end of each calendar month, the operator shall total VOC emissions for the calendar month and for the previous 12 calendar month period from all equipment and operations at the facility that are required to have written permits or are exempt from written permits pursuant to Rule 219 but emit air contaminants greater than 10% of the applicable Major Source Threshold. If total VOC emissions for the 12 calendar month period exceed the emission cap specified above, the operator will be subject to Title V and shall submit a Title V Permit application no later than 12 months after the exceedance.

[District Rules 1303 - Offsets, 1201 - Definitions, 1202 - Applications]

DRAFT



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

C002430

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 2022

OWNER OR OPERATOR (Co. #2762)

Mobile Coating Solutions Inc.
12766 Violet Rd.
Adelanto, CA 92301

EQUIPMENT LOCATION (Fac. #1067)

Mobile Coating Solutions
12766 Violet Road
Adelanto, CA 92301

Description:

HIGH PRESSURE WATER SCRUBBER SYSTEM consisting of: Model No. CL-MPSC-60, venting the Coating and Wrapping Machine.

3,500 gallons water reservoir, Fog Nozzles.

Fog Nozzles 36 Bete Fog Nozzle, model TF8FCCN, with a flow rate of 3.18 gpm, each, and 114.48 gpm combined.

220 GPM Marlow water pump, model 37-Hei-110 with 7" impeller powered by a 15 hp electric motor.

34" tube axle fans powered by one 5 hp electric motor each.

CONDITIONS:

1. This equipment shall only be operated and maintained in strict accord with manufacturer's recommendations.
[District Rule 1302(C)(2)(a)]

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

Fee Schedule: 7 (e)

Rating: 1 device

SIC: 3479

SCC: 30901699

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 Coating Solutions Inc.
12766 Violet Rd.
Adelanto, CA 92301

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

3. This equipment shall be operated when the Pipe Coating and Wrap Line (B002429) is operating.
[District Rule 1303(A)]

4. The water flow to this scrubber shall be equal to or greater than 114 gallons per minute at 60 psig.
[District Rule 1303(A)]

5. 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 daily water flow in gallons per minute and date;
- (b) The daily water pressure reading in psig and date; and,
- (c) The date and nature of any repairs made to this equipment.

[District Rule 1302 (C)(2)(a), 40 CFR 70.6 (a)(3)(B)]

6. Emissions from this facility shall be less than the following:

a. 45.6 tons per year of PM10

b. 25.0 tons per year of VOC

f. 10.0 tons per year for any single HAP and 25.0 tons per year for any combination of HAPs calculated on a rolling twelve-month basis. HAPs are defined in 40 CFR 61.01 and are the chemical compounds listed in section 112(b) of the Clean Air Act (Act).

Compliance with the annual emission limits shall be demonstrated via 12 month rolling sum for VOC and via emission inventory reports for PM10 and HAP.

At the end of each calendar month, the operator shall total VOC emissions for the calendar month and for the previous 12 calendar month period from all equipment and operations at the facility that are required to have written permits or are exempt from written permits pursuant to Rule 219 but emit air contaminants greater than 10% of the applicable Major Source Threshold. If total VOC emissions for the 12 calendar month period exceed the emission cap specified above, the operator will be subject to Title V and shall submit a Title V Permit application no later than 12 months after the exceedance.

[District Rules 1303 - Offsets, 1201 - Definitions, 1202 - Applications]



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

C012493

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 2022

OWNER OR OPERATOR (Co. #2762)

Mobile Coating Solutions Inc.
12766 Violet Rd.
Adelanto, CA 92301

EQUIPMENT LOCATION (Fac. #1067)

Mobile Coating Solutions
12766 Violet Road
Adelanto, CA 92301

Description:

DUST COLLECTOR, CEMENT SILO consisting of: A Flex Kleen dust collector, venting the 1,500 cubic foot Cement Silo on the Cement Mortar Batch Plant under B007998.

Manufacturer: Flex Kleen
Model No.: 84-BVBS-16II G
Serial: 10-52-17933
No. of Filters: 14
Type of Cloth: 100% Polyester
A/C Ratio: 6.7:1 at 1140 acfm
Horsepower: 3
Control Efficiency: 99.98% of PM0.5 microns and larger.

CONDITIONS:

1. This equipment shall only be operated and maintained in strict accord with manufacturer's recommendations.
[District Rule 1302(C)(2)(a)]
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.

Fee Schedule: 7 (h)

Rating: 1 device

SIC: 3479

SCC: 30901699

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 Coating Solutions Inc.
12766 Violet Rd.
Adelanto, CA 92301

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

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

3. This equipment shall be operated when the Cement Silo under the Cement Mortar Batch Plant (B007998) is being loaded or unloaded.

[District Rule 1303(A)]

4. The owner/operator shall have on-site at all times, a minimum inventory of replacement filters to maintain compliance with these conditions at all times.

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

5. This air pollution control device shall be equipped with a differential pressure gauge, which shall be maintained between 1 and 7 inches of water column during operation.

[District Rule 1303(A)]

6. This air pollution control device 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 monthly Visible Emission Determinations (VED) using USEPA Method 22, and USEPA Method 9, if necessary, pursuant to condition 7, below.

[District Rule 401(a)]

7. The owner/operator must conduct a minimum program of inspection and maintenance on this equipment inclusive of the following:

(a) Each day this unit is operated the pressure drop reading shall be recorded in inches of water column.

(b) Once a week a calibration check on the pressure gauge must be recorded by checking for a 'zero reading' before the unit is in operation.

(c) A monthly Visible Emission Determination (VED) and result must be recorded using the following procedures: Ensure that the observer's back is to the sun or artificial light, the observation spot provides a clear view of the emission point(s), observe the emission point(s) for a period of one minute, and designate the emission point(s) as "dusting" or "not dusting". If "dusting" is occurring, owner/operator must conduct a Visible Emission Evaluation using USEPA Method 22, and USEPA Method 9, on each dusting emission point if necessary, or shut down the equipment immediately; and,

(d) Quarterly bag/filter and bag/filter suspension system inspections.

[District Rule 1302 (C)(2)(a), 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 daily operating pressure drop readings and dates;

(b) The weekly 'zero reading' calibration dates;

(c) The monthly VDE dates, locations, and results; and,

(d) The dates and results of the quarterly bag/filter and bag/filter suspension system inspections.

[District Rule 1302 (C)(2)(a), 40 CFR 70.6 (a)(3)(B)]

9. Emissions from this facility shall be less than the following:

a. 45.6 tons per year of PM10

b. 25.0 tons per year of VOC

f. 10.0 tons per year for any single HAP and 25.0 tons per year for any combination of HAPs calculated on a rolling twelve-month basis. HAPs are defined in 40 CFR 61.01 and are the chemical compounds listed in section 112(b) of the Clean Air Act (Act).

Compliance with the annual emission limits shall be demonstrated via 12 month rolling sum for VOC and via emission inventory reports for PM10 and HAP.

At the end of each calendar month, the operator shall total VOC emissions for the calendar month and for the previous 12 calendar month period from all equipment and operations at the facility that are required to have written permits or are exempt from written permits pursuant to Rule 219 but emit air contaminants greater than 10% of the applicable Major Source Threshold.

If total VOC emissions for the 12 calendar month period exceed the emission cap specified above, the operator will be subject to Title V and shall submit a Title V Permit application no later than 12 months after the exceedance.
[District Rules 1303 - Offsets, 1201 - Definitions, 1202 - Applications]

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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

C012782

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 2022

OWNER OR OPERATOR (Co. #2762)

Mobile Coating Solutions Inc.
12766 Violet Rd.
Adelanto, CA 92301

EQUIPMENT LOCATION (Fac. #1067)

Mobile Coating Solutions
12766 Violet Road
Adelanto, CA 92301

Description:

DUST COLLECTOR, VENTING WHEEL BLAST EQUIPMENT consisting of: 3300 CFM dust collector, venting the Wheelabrator Abrasive Blast Machine. (under A012781):

Manufacturer: Wheelabrator
Model No.: 33 MPF, modular pulse type
Number of Bags: 9
A/C Ratio: 1.8:1
Horsepower: 7.5

CONDITIONS:

1. This equipment shall only be operated and maintained in strict accord with manufacturer's recommendations.
[District Rule 1302(C)(2)(a)]

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

Fee Schedule: 7 (h)

Rating: 1 device

SIC: 3479

SCC: 30900201

Location/Coordinates:
+34.56159, -117.38621

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 Coating Solutions Inc.
12766 Violet Rd.
Adelanto, CA 92301

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

3. This equipment shall be operated when the Wheel Blast Equipment (A012781) is operating.
[District Rule 1303(A)]

4. The owner/operator shall have on-site at all times, a minimum inventory of replacement filters to maintain compliance with these conditions at all times.
[District Rule 1302(C)(2)(a)]

5. This air pollution control device shall be equipped with a differential pressure gauge, which shall be maintained between 1 and 7 inches of water column during operation.
[District Rule 1303(A)]

6. This air pollution control device 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 monthly Visible Emission Determinations (VED) using USEPA Method 22, and USEPA Method 9, if necessary, pursuant to condition 7, below.
[District Rule 401(a)]

7. The owner/operator must conduct a minimum program of inspection and maintenance on this equipment inclusive of the following:
(a) Each day this unit is operated the pressure drop reading shall be recorded in inches of water column.
(b) Once a week a calibration check on the pressure gauge must be recorded by checking for a 'zero reading' before the unit is in operation.
(c) A monthly Visible Emission Determination (VED) and result must be recorded using the following procedures: Ensure that the observer's back is to the sun or artificial light, the observation spot provides a clear view of the emission point(s), observe the emission point(s) for a period of one minute, and designate the emission point(s) as "dusting" or "not dusting". If "dusting" is occurring, owner/operator must conduct a Visible Emission Evaluation using USEPA Method 22, and USEPA Method 9, on each dusting emission point if necessary, or shut down the equipment immediately; and,
(d) Quarterly bag/filter and bag/filter suspension system inspections.
[District Rule 1302 (C)(2)(a), 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 daily operating pressure drop readings and dates;
(b) The weekly 'zero reading' calibration dates;
(c) The monthly VDE dates, locations, and results; and,
(d) The dates and results of the quarterly bag/filter and bag/filter suspension system inspections.
[District Rule 1302 (C)(2)(a), 40 CFR 70.6 (a)(3)(B)]

9. Emissions from this facility shall be less than the following:
a. 45.6 tons per year of PM10
b. 25.0 tons per year of VOC
f. 10.0 tons per year for any single HAP and 25.0 tons per year for any combination of HAPs calculated on a rolling twelve-month basis. HAPs are defined in 40 CFR 61.01 and are the chemical compounds listed in section 112(b) of the Clean Air Act (Act).

Compliance with the annual emission limits shall be demonstrated via 12 month rolling sum for VOC and via emission inventory reports for PM10 and HAP.

At the end of each calendar month, the operator shall total VOC emissions for the calendar month and for the previous 12 calendar month period from all equipment and operations at the facility that are required to have written permits or are exempt from written permits pursuant to Rule 219 but emit air contaminants greater than 10% of the applicable Major Source Threshold. If total VOC emissions for the 12 calendar month period exceed the emission cap specified above, the operator will be subject to Title V and shall submit a Title V Permit application no later than 12 months after the exceedance.

[District Rules 1303 - Offsets, 1201 - Definitions, 1202 - Applications]

DRAFT



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

S002431

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 2022

OWNER OR OPERATOR (Co. #2762)

Mobile Coating Solutions Inc.
12766 Violet Rd.
Adelanto, CA 92301

EQUIPMENT LOCATION (Fac. #1067)

Mobile Coating Solutions
12766 Violet Road
Adelanto, CA 92301

Description:

OPEN SPRAY STATION FOR PIPE SECTIONS consisting of: Rule 1115 compliance spray gun, mechanical purge spray gun, and air-atomized spray tip gun when coating internal and inset surfaces of pipes with an inside diameter of 24 inches or less.

CONDITIONS:

1. This equipment shall only be operated and maintained in strict accord with manufacturer's recommendations.
[District Rule 1302(C)(2)(a)]
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.
[District Rule 1302(C)(2)(a)]
3. The owner/operator (o/o) is allowed to coat metal parts with an air-atomized spray tip gun when coating internal and inset surfaces of pipes with an inside diameter of 24 inches or less.
[District Rule 1115 (C)(1)(a)(v)]

Fee Schedule: 7 (c)

Rating: 1 device

SIC: 3479

SCC: 30901699

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 Coating Solutions Inc.
12766 Violet Rd.
Adelanto, CA 92301

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

4. The owner/operator shall not apply any coating to metal pipes, including any VOC-containing materials added to the original coating supplied by the manufacturer, which contains VOC in excess of 3.5 pounds of VOC per gallon or less.
[District Rule 1115 (C)(2)(a)(i)]

5. 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 amount of coatings and solvents applied per day in gallons and the corresponding VOC content in pounds VOC per gallon. These daily recordings shall be used to calculate the monthly VOC emission rate in average pounds per day, pursuant to condition 3(a).
(b) The HAP emissions, calculated in tons, for each consecutive twelve month period to verify compliance with condition 3(c).
[District Rule 1302 (C)(2)(a), 40 CFR 70.6 (a)(3)(B)]

6. 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)]

7. 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)]

8. 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)]

9. Emissions from this facility shall be less than the following:
a. 45.6 tons per year of PM10
b. 25.0 tons per year of VOC
f. 10.0 tons per year for any single HAP and 25.0 tons per year for any combination of HAPs calculated on a rolling twelve-month basis. HAPs are defined in 40 CFR 61.01 and are the chemical compounds listed in section 112(b) of the Clean Air Act (Act).

Compliance with the annual emission limits shall be demonstrated via 12 month rolling sum for VOC and via emission inventory reports for PM10 and HAP.

At the end of each calendar month, the operator shall total VOC emissions for the calendar month and for the previous 12 calendar month period from all equipment and operations at the facility that are required to have written permits or are exempt from written permits pursuant to Rule 219 but emit air contaminants greater than 10% of the applicable Major Source Threshold. If total VOC emissions for the 12 calendar month period exceed the emission cap specified above, the operator will be subject to Title V and shall submit a Title V Permit application no later than 12 months after the exceedance.
[District Rules 1303 - Offsets, 1201 - Definitions, 1202 - Applications]

10. 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]

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