



November 9, 2023

Mr. David Parker Prison Industry Authority - Avenal #1 Kings Way/P.O. Box 8 Avenal, CA 93204

Re: Notice of Final Action - Title V Permit Renewal

> Facility Number: C-954 **Project Number: C-1220506**

Dear Mr. Parker:

The District has issued the Final Renewed Title V Permit for Prison Industry Authority -Avenal (see enclosure). The preliminary decision for this project was made on July 24, 2023. No comments were received following the District's preliminary decision on this project.

The public notice for issuance of the Final Title V Permit will be posted on the District's website (www.valleyair.org).

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Nick Peirce, Permit Services Manager, at (209) 557-6400.

Sincerely.

Brian Clements

**Director of Permit Services** 

**Enclosures** 

CC: Courtney Graham, CARB (w/enclosure) via email

Gerardo Rios, EPA (w/enclosure) via EPS CC:

> Samir Sheikh **Executive Director/Air Pollution Control Officer**

# **Permit to Operate**

FACILITY: C-954 EXPIRATION DATE: 08/31/2027

**LEGAL OWNER OR OPERATOR:** PRISON INDUSTRY AUTHORITY - AVENAL

**MAILING ADDRESS**: 1 KINGS WAY

AVENAL, CA 93204

**FACILITY LOCATION**: 1 KINGS WAY

AVENAL, CA 93204

FACILITY DESCRIPTION: CORRECTIONAL INSTITUTION

The Facility's Permit to Operate may include Facility-wide Requirements as well as requirements that apply to specific permit units.

This Permit to Operate remains valid through the permit expiration date listed above, subject to payment of annual permit fees and compliance with permit conditions and all applicable local, state, and federal regulations. This permit is valid only at the location specified above, and becomes void upon any transfer of ownership or location. Any modification of the equipment or operation, as defined in District Rule 2201, will require prior District approval. This permit shall be posted as prescribed in District Rule 2010.

Samir Sheikh
Executive Director / APCO

Brian Clements
Director of Permit Services

**FACILITY:** C-954-0-4 **EXPIRATION DATE:** 08/31/2027

### **FACILITY-WIDE REQUIREMENTS**

- 1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later 2. than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rule 111 (Kings)]
- The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rule 111 (Kings)]
- The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
- Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
- The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.13.1] Federally Enforceable Through Title V Permit
- A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
- Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
- The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
- 10. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

Facility Name: PRISON INDUSTRY AUTHORITY - AVENAL Location: 1 KINGS WAY, AVENAL, CA 93204 C-954-0-4: Nov 9 2023 10:16AM - MIRANDAM

- 11. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
- 12. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
- 13. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
- 14. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
- 15. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
- 16. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
- 17. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
- 18. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
- 19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
- 20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
- 21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
- 22. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit
- 23. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: PRISON INDUSTRY AUTHORITY - AVENAL

Location: 1 KINGS WAY, AVENAL, CA 93204 C-954-0-4: Nov 9 2023 10:16AM -- MIRANDAM

- 24. No person shall manufacture, blend, repackage, supply, market, sell, solicit or apply any architectural coating or colorant with a VOC content in excess of the applicable limits specified in Table 1 (Coatings) and Table 2 (Colorants) of District Rule 4601 (4/16/20), unless exempted under Section 4.0 of District Rule 4601 (4/16/20). [District Rule 4601] Federally Enforceable Through Title V Permit
- 25. All VOC-containing materials subject to Rule 4601 (4/16/20) shall be stored in closed containers when not in use. [District Rule 4601] Federally Enforceable Through Title V Permit
- 26. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (4/16/20). [District Rule 4601] Federally Enforceable Through Title V Permit
- 27. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
- 28. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
- 29. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
- 30. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8021] Federally Enforceable Through Title V Permit
- 31. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8031] Federally Enforceable Through Title V Permit
- 32. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8041] Federally Enforceable Through Title V Permit
- 33. Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8051] Federally Enforceable Through Title V Permit
- 34. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8061] Federally Enforceable Through Title V Permit
- 35. Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8071] Federally Enforceable Through Title V Permit
- 36. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit

Facility Name: PRISON INDUSTRY AUTHORITY - AVENAL Location: 1 KINGS WAY, AVENAL, CA 93204

C-954-0-4: Nov 9 2023 10:16AM -- MIRANDAM

- 37. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
- 38. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
- 39. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
- 40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Kings) and Rule 202 (Kings). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 41. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
- 42. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin April 1 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2201] Federally Enforceable Through Title V Permit

Facility Name: PRISON INDUSTRY AUTHORITY - AVENAL Location: 1 KINGS WAY, AVENAL, CA 93204 C-954-0-4: Nov 9 2023 10:16AM - MIRANDAM

**PERMIT UNIT:** C-954-1-10 **EXPIRATION DATE:** 08/31/2027

#### **EQUIPMENT DESCRIPTION:**

WOOD PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN, BINKS MODEL PFF-16-10-T-LH SPRAY PAINT BOOTH WITH EXHAUST FILTERS, AND VERID GUNWASHER MODEL 200-1 (COMMON WITH C-954-2)

### PERMIT UNIT REQUIREMENTS

- Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
- The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
- All coating shall be conducted in booth with filters in place, fan(s) operating, and doors closed. [District Rule 2201] Federally Enforceable Through Title V Permit
- Permit units C-954-1 and C-954-2 shall not be operated simultaneously. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
- The combined weekly emissions from equipment operated under permits C-954-1, C-954-2 and C-954-14 shall not exceed either of the following limits: 224 lb-VOC or 9.1 lb-PM10. [District Rule 2201] Federally Enforceable Through Title V Permit
- The daily emissions from this spray paint booth shall not exceed either of the following limits: 64.0 lb-VOC or 2.6 lb-PM10. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
- Daily VOC emissions of each coating and/or solvent shall be calculated as follows: daily VOC emissions = VOC content (lb/gallon) as applied x usage (gallon/day). Total daily VOC emissions is the sum of VOC emissions from all coatings and/or solvents used. [District Rule 2201] Federally Enforceable Through Title V Permit
- Daily PM10 emissions of each coating and/or primer applied shall be calculated as follows: daily PM10 emissions of each coating applied = coating density (lb/gallon) x coating solids content (% by weight) x usage (gallons/day) x control efficiency factor. Control efficiency factor is 0.0125 for coating applied inside the booth. Total daily PM10 emissions is the sum of PM10 emissions from all coatings applied. [District Rule 2201] Federally Enforceable Through Title V Permit
- VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: clear topcoat 275 g/l (2.3 lb/gallon), filler 275 g/l (2.3 lb/gallon), high-solids stains 240 g/l (2.0 lb/gallon), ink 500 g/l (4.2 lb/gallon), mold-seal coating 750 g/l (6.3 lb/gallon), multi-colored coating 275 g/l (2.3 lb/gallon), pigmented coating 275 g/l (2.3 lb/gallon), sanding sealer 275 g/l (2.3 lb/gallon). [District Rule 4606] Federally Enforceable Through Title V Permit
- 10. VOC content of materials for wood products, as applied, shall not exceed either of the following limits: low-solids stain 120 g/l (1.0 lb/gallon) or stripper 350 g/l (2.9 lb/gallon). [District Rule 4606] Federally Enforceable Through Title V Permit
- 11. VOC content of solvents used shall not exceed 25 g/l (0.21 lb/gal). [District Rule 4606] Federally Enforceable Through Title V Permit

Facility Name: PRISON INDUSTRY AUTHORITY - AVENAL Location: 1 KINGS WAY, AVENAL, CA 93204 C-954-1-10: Nov 9 2023 10:16AM - MIRANDAM

- 12. VOC content of strippable booth coating shall not exceed 450 g/l (3.8 lb/gallon) as applied, excluding water and exempt compounds. [District Rule 4606] Federally Enforceable Through Title V Permit
- 13. Only HVLP, electrostatic, brush, dip, flow, or roll coating application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4606] Federally Enforceable Through Title V Permit
- 14. If an HVLP spray gun is used, the operator must demonstrate that the spray gun operates between 0.1 and 10 pounds per square inch, gauge, (psig) air atomizing pressure, measured dynamically at the center of the air cap and at the air horns. For a gun permanently labeled HVLP by the manufacturer, a satisfactory demonstration shall either be in the form of manufacturer's published technical information or by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer of the gun. For a gun not permanently labeled HVLP by the manufacturer, a satisfactory demonstration shall be based on manufacturer's published technical material and by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer of the gun. [District Rule 4606] Federally Enforceable Through Title V Permit
- 15. The operator shall comply with the following work practice standards: 1) store all VOC-containing coatings, thinners, cleaning materials, and waste materials in closed non-absorbent and non-leaking containers, keeping the containers closed at all times except when specifically in use; 2) close mixing vessels that contain VOC coatings and other materials, except when specifically in use; 3) minimize spills of any VOC-containing materials and clean up spills immediately; and 4) convey VOC-containing materials in closed containers or pipes. [District Rule 4606] Federally Enforceable Through Title V Permit
- 16. An operator shall store or dispose of fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4606] Federally Enforceable Through Title V Permit
- 17. All solvents shall indicate on the solvent container, or on a separate product data sheet or material safety data sheet, the name of the solvent, manufacturer's name, the VOC content (in gm/liter or lb/gallon), and density of the solvent, as supplied. [District Rule 4606] Federally Enforceable Through Title V Permit
- 18. On a daily basis, the permittee shall calculate and record the following: total daily VOC emissions (lb/day); and total daily PM10 emissions (lb/day). [District Rule 2201] Federally Enforceable Through Title V Permit
- 19. The permittee shall maintain records on a daily basis and have available at all times the following: a current list of all coatings used that includes the material name and manufacturer, application method, coating type and mix ratio specific to the coating, the VOC Actual for Coatings and VOC Regulatory for Coatings as applied, density and solids content of coatings, and the quantity of each type of coating used; current manufacturer specification sheets, material safety data sheets (MSDS), technical data sheets, or air quality data sheets, which list the VOC Actual for Coatings and VOC Regulatory for Coatings of each ready-to-spray coating; and purchase records identifying the coating type, name. [District Rules 2201 and 4606] Federally Enforceable Through Title V Permit
- 20. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 2201 and 4606] Federally Enforceable Through Title V Permit

Facility Name: PRISON INDUSTRY AUTHORITY - AVENAL Location: 1 KINGS WAY, AVENAL, CA 93204 C-954-1-10: Nov 9 2023 10:16AM -- MIRANDAM

**PERMIT UNIT:** C-954-2-10 **EXPIRATION DATE:** 08/31/2027

#### **EQUIPMENT DESCRIPTION:**

WOOD PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN, BINKS MODEL PFF-16-10-T-LH SPRAY PAINT BOOTH WITH EXHAUST FILTERS AND VERID GUNWASHER MODEL 200-1 (COMMON WITH C-954-1) AND LOCATED IN BLDG #290. FURNITURE FACTORY

### PERMIT UNIT REQUIREMENTS

- Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
- 2. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
- All coating shall be conducted in booth with filters in place, fan(s) operating, and doors closed. [District Rule 2201] Federally Enforceable Through Title V Permit
- Permit units C-954-1 and C-954-2 shall not be operated simultaneously. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
- The combined weekly emissions from equipment operated under permits C-954-1, C-954-2 and C-954-14 shall not exceed either of the following limits: 224 lb-VOC or 9.1 lb-PM10. [District Rule 2201] Federally Enforceable Through Title V Permit
- The daily emissions from this spray paint booth shall not exceed either of the following limits: 64.0 lb-VOC or 2.6 lb-PM10. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
- Daily VOC emissions of each coating and/or solvent shall be calculated as follows: daily VOC emissions = VOC content (lb/gallon) as applied x usage (gallon/day). Total daily VOC emissions is the sum of VOC emissions from all coatings and/or solvents used. [District Rule 2201] Federally Enforceable Through Title V Permit
- Daily PM10 emissions of each coating and/or primer applied shall be calculated as follows: daily PM10 emissions of each coating applied = coating density (lb/gallon) x coating solids content (% by weight) x usage (gallons/day) x control efficiency factor. Control efficiency factor is 0.0125 for coating applied inside the booth. Total daily PM10 emissions is the sum of PM10 emissions from all coatings applied. [District Rule 2201] Federally Enforceable Through Title V Permit
- VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: clear topcoat 275 g/l (2.3 lb/gallon), filler 275 g/l (2.3 lb/gallon), high-solids stains 240 g/l (2.0 lb/gallon), ink 500 g/l (4.2 lb/gallon), mold-seal coating 750 g/l (6.3 lb/gallon), multi-colored coating 275 g/l (2.3 lb/gallon), pigmented coating 275 g/l (2.3 lb/gallon), sanding sealer 275 g/l (2.3 lb/gallon). [District Rule 4606] Federally Enforceable Through Title V Permit
- 10. VOC content of materials for wood products, as applied, shall not exceed either of the following limits: low-solids stain 120 g/l (1.0 lb/gallon) or stripper 350 g/l (2.9 lb/gallon). [District Rule 4606] Federally Enforceable Through Title V Permit
- 11. VOC content of solvents used shall not exceed 25 g/l (0.21 lb/gal). [District Rule 4606] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: PRISON INDUSTRY AUTHORITY - AVENAL Location: 1 KINGS WAY, AVENAL, CA 93204 C-954-2-10: Nov 9 2023 10:16AM - MIRANDAM

- 12. VOC content of strippable booth coating shall not exceed 450 g/l (3.8 lb/gallon) as applied, excluding water and exempt compounds. [District Rule 4606] Federally Enforceable Through Title V Permit
- 13. Only HVLP, electrostatic, brush, dip, flow, or roll coating application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4606] Federally Enforceable Through Title V Permit
- 14. If an HVLP spray gun is used, the operator must demonstrate that the spray gun operates between 0.1 and 10 pounds per square inch, gauge, (psig) air atomizing pressure, measured dynamically at the center of the air cap and at the air horns. For a gun permanently labeled HVLP by the manufacturer, a satisfactory demonstration shall either be in the form of manufacturer's published technical information or by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer of the gun. For a gun not permanently labeled HVLP by the manufacturer, a satisfactory demonstration shall be based on manufacturer's published technical material and by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer of the gun. [District Rule 4606] Federally Enforceable Through Title V Permit
- 15. The operator shall comply with the following work practice standards: 1) store all VOC-containing coatings, thinners, cleaning materials, and waste materials in closed non-absorbent and non-leaking containers, keeping the containers closed at all times except when specifically in use; 2) close mixing vessels that contain VOC coatings and other materials, except when specifically in use; 3) minimize spills of any VOC-containing materials and clean up spills immediately; and 4) convey VOC-containing materials in closed containers or pipes. [District Rule 4606] Federally Enforceable Through Title V Permit
- 16. An operator shall store or dispose of fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4606] Federally Enforceable Through Title V Permit
- 17. All solvents shall indicate on the solvent container, or on a separate product data sheet or material safety data sheet, the name of the solvent, manufacturer's name, the VOC content (in gm/liter or lb/gallon), and density of the solvent, as supplied. [District Rule 4606] Federally Enforceable Through Title V Permit
- 18. On a daily basis, the permittee shall calculate and record the following: total daily VOC emissions (lb/day); and total daily PM10 emissions (lb/day). [District Rule 2201] Federally Enforceable Through Title V Permit
- 19. The permittee shall maintain records on a daily basis and have available at all times the following: a current list of all coatings used that includes the material name and manufacturer, application method, coating type and mix ratio specific to the coating, the VOC Actual for Coatings and VOC Regulatory for Coatings as applied, density and solids content of coatings, and the quantity of each type of coating used; current manufacturer specification sheets, material safety data sheets (MSDS), technical data sheets, or air quality data sheets, which list the VOC Actual for Coatings and VOC Regulatory for Coatings of each ready-to-spray coating; and purchase records identifying the coating type, name. [District Rules 2201 and 4606] Federally Enforceable Through Title V Permit
- 20. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 2201 and 4606] Federally Enforceable Through Title V Permit

Facility Name: PRISON INDUSTRY AUTHORITY - AVENAL Location: 1 KINGS WAY, AVENAL, CA 93204 C-954-2-10: Nov 9 2023 10:16AM - MIRANDAM

**EXPIRATION DATE:** 08/31/2027 **PERMIT UNIT:** C-954-3-14

#### **EQUIPMENT DESCRIPTION:**

WOOD FURNITURE FACTORY LOCATED IN BLDG #290 WITH WOODWORKING OPERATION CONSISTING OF 4 TABLE SAWS, 2 CHOP SAWS, 1 BAND SAW, 1 PANEL SAW, 1 CNC PANEL SAW, 1 CNC SAW, 5 SANDERS, 2 SHAPERS, 1 CLEANER, 1 PLANER, 2 EDGE BANDERS, 5 CNC ROUTERS, 2 DRAWER DOVETAILER AND OTHER RELATED EQUIPMENT ALL SERVED BY AN R.P. RICHARDS MODEL 12-216-3464 BAGHOUSE DUST COLLECTOR WITH REVERSE PULSED-JET CLEANING SYSTEM AND A HEATED PANEL EXPRESS GLUE PRESS SYSTEM

### PERMIT UNIT REQUIREMENTS

- All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
- No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102] 2.
- 3. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
- Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
- Visible emissions from the exhaust of the dust collector serving the woodworking operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
- The amount of sawdust collected shall not exceed 2,160 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 7. The PM10 emissions from the dust collector shall not exceed 1.1 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- 8. The daily amount of adhesive used shall not exceed 11 gallons/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- The annual amount of adhesive used shall not exceed 1,100 gallons/year. [District Rule 2201] Federally Enforceable Through Title V Permit
- 10. The permittee shall only use the following adhesives: Wilson Arts (WA) 3100 Series and Franklin International Titebond Cold Press. [District Rule 2201] Federally Enforceable Through Title V Permit
- 11. All ducting and control equipment shall be in good working order to prevent fugitive particulate emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
- 12. All filters shall be properly maintained and must be in place during the woodworking operation(s). [District Rule 2201] Federally Enforceable Through Title V Permit
- 13. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit

Facility Name: PRISON INDUSTRY AUTHORITY - AVENAL Location: 1 KINGS WAY, AVENAL, CA 93204 C-954-3-14: Nov 9 2023 10:16AM - MIRANDAM

- 14. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
- 15. The baghouse shall operate at all times with a minimum differential pressure of 0.5 inches water column and a maximum differential pressure of 4 inches water column. [District Rule 2201] Federally Enforceable Through Title V Permit
- 16. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
- 17. Dust collector exhaust fan(s) shall be switched on prior to the start-up of any woodworking equipment. [District Rule 2201] Federally Enforceable Through Title V Permit
- 18. Replacement bags numbering at least 10% of the total number of bags in the baghouse shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
- 19. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
- 20. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter breakthrough and shall be replaced as needed. [District Rule 2201] Federally Enforceable Through Title V Permit
- 21. Adhesives shall be applied only utilizing electrostatic application, flow coating, roll coating, dip coating, hand application, airless spray, HVLP spray or other spray application methods that are shown to provide transfer efficiency equivalent to that of HVLP. Air-atomized spray may be utilized for the application of contact adhesives and specialty contact adhesives. [District Rule 4653] Federally Enforceable Through Title V Permit
- 22. The operator shall store and dispose of adhesive products, sealant products, catalysts, thinners, fresh and spent solvents and waste solvent materials such as cloth, paper, etc. in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing material or when the containers are empty. [District Rule 4653] Federally Enforceable Through Title V Permit
- 23. Permittee shall record on a daily basis the amount of sawdust collected in pounds. [District Rule 2201] Federally Enforceable Through Title V Permit
- 24. Permittee shall keep the following records for adhesive activities: manufacturers product data sheet or MSDS of adhesives used and VOC content of adhesives in g/l or lb/gal. [District Rule 2201] Federally Enforceable Through Title V Permit
- 25. Permittee shall record on a daily basis the quantity and type of adhesive used in gallons. [District Rule 2201] Federally Enforceable Through Title V Permit
- 26. Records of dust collector maintenance, inspections, and repairs including all change outs of filter media, shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2201] Federally Enforceable Through Title V Permit
- 27. Records of the daily differential operating pressure readings shall be retained on-site. [District Rule 2201] Federally Enforceable Through Title V Permit
- 28. All records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

Facility Name: PRISON INDUSTRY AUTHORITY - AVENAL Location: 1 KINGS WAY, AVENAL, CA 93204 C-954-3-14: Nov 9 2023 10:16AM - MIRANDAM

**PERMIT UNIT:** C-954-4-9 **EXPIRATION DATE:** 08/31/2027

#### **EQUIPMENT DESCRIPTION:**

POWDER COATING OPERATION CONSISTING OF POWDER COATING BOOTH, 1.8 MMBTU/HR DRY-OFF OVEN, 3.3 MMBTU/HR BAKE OVEN, AND 0.34 MMBTU/HR CONTROLLED PYROLYSIS FURNACE WITH INTEGRAL AFTERBURNER FOR PARTS HANGER CLEANING

## PERMIT UNIT REQUIREMENTS

- All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
- Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally 2. Enforceable Through Title V Permit
- Only PUC-regulated natural gas shall be used as a fuel for the ovens and Controlled Pyrolysis burn-off furnace. [District Rule 2201] Federally Enforceable Through Title V Permit
- Emissions from the Controlled Pyrolysis burn-off furnace shall not exceed any of the following limits: 0.0271 lb-NOx/hr, 0.050 lb-CO/hr, 0.0174 lb-VOC/hr, 0.0133 lb-PM10/hr, and 0.0018 lb-SOx/hr. [District Rule 2201] Federally Enforceable Through Title V Permit
- Emissions from the natural gas-fired ovens shall not exceed any of the following limits: 0.10 lb-NOx/MMBtu, 0.084 lb-CO/MMBtu, 0.0076 lb-PM10/MMBtu, 0.0055 lb-VOC/MMBtu, and 0.0006 lb-SOx/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
- Daily usage of powder coating shall not exceed 600 pounds. [District Rule 2201] Federally Enforceable Through Title V Permit
- All coating shall be conducted in booth with filters in place and fan(s) operating. [District Rule 2201] Federally Enforceable Through Title V Permit
- Only electrostatic application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 2201] Federally Enforceable Through Title V Permit
- 9. Powder coating material shall not contain VOC. Manufacturer's material safety data sheets may be used to confirm the VOC content of the powder coating. [District Rules 2201 and 4603] Federally Enforceable Through Title V Permit
- 10. VOC content of solvents used for all solvent cleaning operations shall not exceed 25 g/l (0.21 lb/gal). [District Rule 4603] Federally Enforceable Through Title V Permit
- 11. An operator shall store or dispose of fresh or spent, solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4603] Federally Enforceable Through Title V Permit
- 12. All solvents shall indicate on the solvent container, or on a separate product data sheet or material safety data sheet, the name of the solvent, manufacturer's name, the VOC content (in gm/liter or lb/gallon), and density of the solvent, as supplied. [District Rule 4603] Federally Enforceable Through Title V Permit
- 13. Permittee shall maintain daily records of number of pounds of powder coating used. [District Rule 1070] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: PRISON INDUSTRY AUTHORITY - AVENAL 1 KINGS WAY, AVENAL, CA 93204 Location:

C-954-4-9: Nov 9 2023 10:16AM -- MIRANDAM

- 14. Operator shall maintain copies of fuel invoices. [District Rule 2520] Federally Enforceable Through Title V Permit
- 15. Visible emissions from the powder coating booth shall be checked annually. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520] Federally Enforceable Through Title V Permit
- 16. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070 and 4603] Federally Enforceable Through Title V Permit

Facility Name: PRISON INDUSTRY AUTHORITY - AVENAL Location: 1 KINGS WAY, AVENAL, CA 93204 C-954-4-9: Nov 9 2023 10:16AM -- MIRANDAM

**PERMIT UNIT:** C-954-10-5 **EXPIRATION DATE:** 08/31/2027

#### **EQUIPMENT DESCRIPTION:**

POWDER COATING OPERATION WITH ELECTROSTATIC APPLICATION EQUIPMENT, BOOTH WITH DRY FILTERS AND A 0.75 MMBTU/HR NATURAL GAS-FIRED BATCH CURING OVEN

### PERMIT UNIT REQUIREMENTS

- All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
- Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
- 3. Only PUC-regulated natural gas shall be used as a fuel for the oven. [District Rule 2201] Federally Enforceable Through Title V Permit
- NOx emissions from the natural gas-fired oven shall not exceed 0.10 lb-NOx/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
- Daily usage of powder coating shall not exceed 319 pounds. [District Rule 2201] Federally Enforceable Through Title V Permit
- All coating shall be conducted in booth with filters in place and fan(s) operating. [District Rule 2201] Federally Enforceable Through Title V Permit
- Only electrostatic application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 2201] Federally Enforceable Through Title V Permit
- Powder coating material shall not contain VOC. Manufacturer's material safety data sheets may be used to confirm the VOC content of the powder coating. [District Rules 2201 and 4603] Federally Enforceable Through Title V Permit
- VOC content of solvents used for all solvent cleaning operations shall not exceed 25 g/l (0.21 lb/gal). [District Rule 4603] Federally Enforceable Through Title V Permit
- 10. An operator shall store or dispose of fresh or spent, solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4603] Federally Enforceable Through Title V Permit
- 11. All solvents shall indicate on the solvent container, or on a separate product data sheet or material safety data sheet, the name of the solvent, manufacturer's name, the VOC content (in gm/liter or lb/gallon), and density of the solvent, as supplied. [District Rule 4603] Federally Enforceable Through Title V Permit
- 12. Permittee shall maintain daily records of number of pounds of powder coating used. [District Rule 1070] Federally Enforceable Through Title V Permit
- 13. Operator shall maintain copies of fuel invoices. [District Rule 2520] Federally Enforceable Through Title V Permit

Facility Name: PRISON INDUSTRY AUTHORITY - AVENAL Location: 1 KINGS WAY, AVENAL, CA 93204 C-954-10-5 : Nov 9 2023 10:16AM -- MIRANDAM

- 14. Visible emissions from the powder coating booth shall be checked annually. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520] Federally Enforceable Through Title V Permit
- 15. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070 and 4603] Federally Enforceable Through Title V Permit

**EXPIRATION DATE:** 08/31/2027 **PERMIT UNIT:** C-954-14-6

#### **EQUIPMENT DESCRIPTION:**

CONVEYORIZED UV COATING LINE CONSISTING OF AN INCLINED UV CURING SYSTEM COATING OPERATION WITH A PAINT SPRAY BOOTH WITH DRY EXHAUST FILTERS, AND WOODWORKING OPERATION INCLUDING: A BELT CONVEYOR, A ROTARY SANDING/DENIBBING MACHINE, A RECIPROCATING SPRAY MACHINE, A PANEL BRUSHING MACHINE, A BELT CONVEYOR FOR HAND SANDING, A BELT CONVEYOR FOR HAND WIPING, A MULTI-LEVEL FLASH-OFF OVEN SYSTEM (ELECTRIC OVEN) EXHAUSTED THROUGH DANTHERM MODEL CS-3-M BAGHOUSE INCLUDING A 40 HP BLOWER AND FILTRATION UNIT. AND A PERMIT EXEMPT BOILER (NATURAL GAS-FIRED, 5 MMBTU/HR OR LESS)

### PERMIT UNIT REQUIREMENTS

- 1. Particulate matter emissions from the coating operation shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
- Emissions from equipment operated under permits C-954-1, C-954-2 and C-954-14 shall not exceed either of the following limits: 224 lb-VOC/week or 9.1 lb-PM10/week, [District Rule 2201] Federally Enforceable Through Title V Permit
- Visible emissions from the exhaust of the baghouse serving the woodworking operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
- All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
- 5. All coating shall be conducted inside the booth with filters in place, fan(s) operating, and doors closed. [District Rule 2201] Federally Enforceable Through Title V Permit
- PM10 emissions from the baghouse shall not exceed 0.004 gr/dscf. [District Rules 2201 and 4201] Federally Enforceable Through Title V Permit
- The emissions from equipment operated under this permit shall not exceed either of the following limits: 46.0 lb-7. VOC/day or 9.1 lb-PM10/day. [District Rule 2201] Federally Enforceable Through Title V Permit
- Material removed from the baghouse shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
- VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: clear topcoat 275 g/l (2.3 lb/gallon), filler 275 g/l (2.3 lb/gallon), high-solids stains 240 g/l (2.0 lb/gallon), ink 500 g/l (4.2 lb/gallon), mold-seal coating 750 g/l (6.3 lb/gallon), multi-colored coating 275 g/l (2.3 lb/gallon), pigmented coating 275 g/l (2.3 lb/gallon), or sanding sealer 275 g/l (2.3 lb/gallon). [District Rules 2201 and 4606] Federally Enforceable Through Title V Permit
- 10. VOC content of coatings as applied, used for wood product, shall not exceed either of the following limits: low-solids stain 120 g/l (1.0 lb/gallon) or stripper 350 g/l (2.9 lb/gallon). [District Rules 2201 and 4606] Federally Enforceable Through Title V Permit
- 11. VOC content of strippable booth coating shall not exceed 450 g/l (3.8 lb/gallon) as applied, excluding water and exempt compounds. [District Rule 4606] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: PRISON INDUSTRY AUTHORITY - AVENAL

Location: 1 KINGS WAY, AVENAL, CA 93204 C-954-14-6: Nov 9 2023 10:16AM - MIRANDAM

- 12. Only HVLP, electrostatic, brush, dip, flow, or roll coating application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rules 2201 and 4606] Federally Enforceable Through Title V Permit
- 13. If an HVLP spray gun is used, the operator must demonstrate that the spray gun operates between 0.1 and 10 pounds per square inch, gauge, (psig) air atomizing pressure, measured dynamically at the center of the air cap and at the air horns. For a gun permanently labeled HVLP by the manufacturer, a satisfactory demonstration shall either be in the form of manufacturer's published technical information or by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer of the gun. For a gun not permanently labeled HVLP by the manufacturer, a satisfactory demonstration shall be based on manufacturer's published technical material and by a demonstration of the operation of the gun using an air pressure tip gauge from the manufacturer of the gun. [District Rule 4606] Federally Enforceable Through Title V Permit
- 14. The operator shall comply with the following work practice standards: 1) store all VOC-containing coatings, thinners, cleaning materials, and waste materials in closed non-absorbent and non-leaking containers, keeping the containers closed at all times except when specifically in use; 2) close mixing vessels that contain VOC coatings and other materials, except when specifically in use; 3) minimize spills of any VOC-containing materials and clean up spills immediately; and 4) convey VOC-containing materials in closed containers or pipes. [District Rule 4606] Federally Enforceable Through Title V Permit
- 15. VOC content of solvents used shall not exceed 25 g/l (0.21 lb/gal). [District Rule 4606] Federally Enforceable Through Title V Permit
- 16. Permittee shall not use cleaning material with a VOC content greater than 25 g/l (0.21 lb/gallon) for all solvent cleaning operations unless such cleaning operations are carried out within an APCO-approved emission control system. [District Rule 4606] Federally Enforceable Through Title V Permit
- 17. An operator shall store or dispose of fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty. [District Rule 4606] Federally Enforceable Through Title V Permit
- 18. Each container or accompanying data sheet of any coating shall display: 1) a statement of the manufacturer's recommendation regarding thinning of the coating, excluding the thinning of coatings with water, and 2) the maximum VOC content of the coating, as applied, and after any thinning as recommended by the manufacturer. VOC content shall be displayed as grams of VOC per liter of coating (less water and exempt compounds). [District Rule 4606] Federally Enforceable Through Title V Permit
- 19. All solvents shall indicate on the solvent container, or on a separate product data sheet or material safety data sheet, the name of the solvent, manufacturer's name, the VOC content (in gm/liter or lb/gallon), and density of the solvent, as supplied. [District Rule 4606] Federally Enforceable Through Title V Permit
- 20. The baghouse shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
- 21. The cleaning frequency and duration for the baghouse shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
- 22. Replacement bags numbering at least 10% of the total number of bags in the baghouse shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
- 23. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the filters. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
- 24. The baghouse shall operate at all times with a minimum differential pressure of 0.5 inches water column and a maximum differential pressure of 4.0 inches water column [District Rule 2201] Federally Enforceable Through Title V Permit

Facility Name: PRISON INDUSTRY AUTHORITY - AVENAL

- 25. Records of all maintenance of the baghouse, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
- 26. The permittee shall maintain a current file of coatings, inks, adhesives, and solvents in use and in storage. The file shall include material safety data sheet (MSDS) or product data sheet showing the material name, manufacturer's name, VOC content as applied, and mix ratio of components. [District Rule 4606] Federally Enforceable Through Title V Permit
- 27. Permittee shall maintain daily records of the following: application method, substrate coating applied to, quantity and type of coatings and solvents used, mix ratios (by volume) of components added to each coating, volume of coatings applied, VOC content of each coating as applied, and VOC content of each solvent or stripper. [District Rules 2201 and 4606] Federally Enforceable Through Title V Permit
- 28. On a daily basis, the permittee shall calculate and record the daily VOC and PM10 emissions, in pounds, for each coating applied. [District Rule 2201] Federally Enforceable Through Title V Permit
- 29. Daily PM10 emissions of each coating applied shall be calculated as follows: daily PM10 emissions = coating density (lb/gallon) x coating solids content (%) x usage (gallons/day) x 0.05 x (1 - Transfer Efficiency). The transfer efficiency is equal to: 0.75 for HVLP gun, and 1.0 for manual application (brush or roll). Total daily PM10 emissions is the sum of PM10 emissions from all coatings applied. [District Rule 2201] Federally Enforceable Through Title V Permit
- 30. Daily VOC emissions of each coating and/or solvent shall be calculated as follows: daily VOC emissions = VOC content (lb/gallon) as applied x usage (gallon/day). Total daily VOC emissions is the sum of VOC emissions from all coatings and/or solvents used. [District Rule 2201] Federally Enforceable Through Title V Permit
- 31. Differential operating pressure for the baghouse shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
- 32. Permittee shall keep the following records for solvent cleaning activities: manufacturer's product data sheet or MSDS of solvents used, VOC content of solvents in g/l or lb/gal, and the type of cleaning activity for which each solvent is used. [District Rule 4606] Federally Enforceable Through Title V Permit
- 33. Permittee shall maintain daily records of quantity (gallons), density, and solids content of coating applied. Permittee shall also maintain daily records of VOC content as applied (lb/gal) of each coating used, quantity (gallons) of each coating used, and calculated daily VOC emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
- 34. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rules 2201 and 4606] Federally Enforceable Through Title V Permit

Facility Name: PRISON INDUSTRY AUTHORITY - AVENAL Location: 1 KINGS WAY, AVENAL, CA 93204 C-954-14-6: Nov 9 2023 10:16AM - MIRANDAM





### COMPLIANCE ASSISTANCE BULLETIN

(Updated September 2015)

#### TITLE V REPORTING REQUIREMENTS

Title V Permit holders are required to submit three types of reports. The first is the *Deviation Report*. All Title V facilities are required to promptly report any deviations from permit requirements to the District. Reports are to be submitted within 10 days of discovery and must include a description of the permit requirement deviation, the probable cause, and any corrective action or preventive measures taken. Send this report to the local Compliance Division office.

The second is the **Report of Required Monitoring** required every six months. This report must clearly define all instances of deviations from permit monitoring requirements. This report is to be submitted to the District every 6 months. The initial permit issuance date is designated as the beginning of the reporting period, unless other arrangements are made with the District.

The third is the *Compliance Certification*. This document certifies compliance with the terms and standards contained in Title V permits including emission limits, standards, and work practices. The certification shall include the identification of each federally enforceable permit condition and its compliance status. The certification shall also report whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. The Compliance Certification is to be submitted annually to the District, and a copy is to be submitted to EPA. The initial permit issuance date is designated as the beginning of the reporting period, unless other arrangements are made with the District.

District Rule 2520 requires that any report or document submitted, pursuant to a Title V permit, shall contain a *Certification of Truth and Accuracy Form*. This certification is to be signed by the responsible official of record indicating that the information contained in the submittal has been reviewed and is true, accurate, and complete. Please use the attached reporting forms designed for your use. Computer versions are also available on the District web-site (valleyair.org). If you have any questions, please contact the Compliance Department at your nearest regional office.

Please send the semi-annual *Report of Required Monitoring* and the annual *Compliance Certification* to your nearest regional office, attention to:

Compliance Title V Reporting San Joaquin Valley Air Pollution Control District

A copy of the annual **Compliance Certification** should also be sent to:

U.S. EPA Region IX Air - 3 75 Hawthorne Street San Francisco, CA 94105