

ORIGINAL

SOUTH COAST AQMD
CLERK OF THE BOARDS

2024 APR 24 AM 9:42

PETITION FOR VARIANCE
BEFORE THE HEARING BOARD OF THE
SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

SV 5/14/24

RV

PETITIONER: 3M ESPE Dental Products Division (3M)

CASE NO: 6256-1

FACILITY ID: 013563

FACILITY ADDRESS: 2111 McGaw Avenue
[location of equipment/site of violation; specify business/corporate address, if different, under Item 2, below]

City, State, Zip: Irvine, California, 92614

1. TYPE OF VARIANCE REQUESTED (more than one box may be checked; see Attachment A, Item 1, before selecting)

INTERIM SHORT REGULAR EMERGENCY EX PARTE EMERGENCY

2. CONTACT: Name, title, company (if different than Petitioner), address, and phone number of persons authorized to receive notices regarding this Petition (no more than two authorized persons).

Bruce Ambruster

Gaby Zappia

Directing Consultant

Global EHS Compliance & Permitting Adv. Specialist

ALL4 Environmental CA, LLC

Solventum

12505 North Mainstreet Zip 91739

2111 McGaw Avenue Zip 92614

☎ (909) 477-7103 Ext. _____

☎ (651) 592-8293 Ext. _____

Fax (_____) _____

Fax (_____) _____

E-mail bambruster@all4inc.com

E-mail gzappia@solventum.com

3. RECLAIM Permit Yes No

Title V Permit Yes No

Persons with disabilities may request this document in an alternative format by contacting the Clerk of the Board at 909-396-2500 or by e-mail at clerkofboard@aqmd.gov.

If you require disability-related accommodations to facilitate participating in the hearing, contact the Clerk of the Board at least five (5) calendar days prior to the hearing.

[ALL DOCUMENTS FILED WITH CLERK'S OFFICE BECOME PUBLIC RECORD]

4. **GOOD CAUSE:** Explain why your petition was not filed in sufficient time to issue the required public notice. (Required only for Emergency and Interim Variances; see Attachment A, Item 4)

Not applicable – Petitioner is filing for a short and regular variance as described in question (1) of this document.

5. Briefly describe the type of business and processes at your facility.

Dental products are produced at the Irvine facility. The facility uses a coating and drying system to dry dental restorative fillers that are being used by dentists for aesthetic procedures.

The gap dryer is used to dry dental restorative products. The gap dryer process begins with silica and solvent slurry loaded onto webbing. The webbing passes between hot and cold plates in the gap dryer and the solvent is volatilized, condensed, and collected as waste. A fraction of the solvent passes around the condensers and is emitted. The types of solvents used in the gap dryer include propylene glycol monomethyl ether (PGME), isopropyl alcohol (IPA), and methanol. VOC emissions are vented to the RTO with a control efficiency of at least 95 percent (expected range is 95 to 98+ percent).

The RTO consists of two chambers and contains saddles and monolith regenerative media. The maximum heat rating of the burner is 0.90 million British thermal units per hour (MMBtu/hr): The regenerative process starts by flowing process gas into the manifolds. The process emissions are directed into one set of valves for distribution into one of the two regenerator beds. The untreated exhaust enters one of the ceramic media-filled regenerator columns. In the column, the exhaust stream is heated from approximately 120 degrees Fahrenheit (°F) to over 1,430°F. After the column, the exhaust will be oxidized in the combustion chamber where the temperature will be raised to 1,500°F or more.

The RTO reduces VOC emissions by at least 95 percent.

To minimize oxides of nitrogen (NOx) emissions from natural gas combustion at the RTO, the RTO uses a Low NOx burner.

6. List the equipment and/or activity(s) that are the subject of this petition (see Attachment A, Item 6, Example #1). **Attach copies of the Permit(s) to Construct and/or Permit(s) to Operate for the subject equipment. For RECLAIM or Title V facilities, attach *only* the relevant sections of the Facility Permit showing the equipment or process and conditions that are subject to this petition. You must bring the entire Facility Permit to the hearing.**

Equipment/Activity	Application/ Permit No.	RECLAIM Device No.	Date Application/Plan Denied (if relevant)*
<i>Air Pollution Control System consisting of:</i> <ul style="list-style-type: none"> • <i>Regenerative thermal oxidizer, catalytic products, model Triton 4.95, two ceramic beds, with one burner, Maxon, Model Kinedizer, 900,000 Btu per hour, natural gas fired, and 3 H.P. combustion air blower</i> • <i>Exhaust system with 25 HP blower venting two spray dryers, a Nautilus coating and drying system, and five ovens (Rule 219 exempt).</i> 	A/N 535931	N/A	N/A

*Attach copy of denial letter

7. Briefly describe the activity or equipment, and why it is necessary to the operation of your business. A schematic or diagram may be attached, in addition to the descriptive text.

The facility uses the RTO to control VOC emissions generated during the application of solvents in the gap dryer. The gap dryer process begins with silica and solvent slurry loaded onto webbing. The webbing passes between hot and cold plates in the gap dryer and the solvent is volatilized, condensed, and collected as waste. A fraction of the solvent passes around the condensers and is emitted. The types of solvents used in the gap dryer include propylene glycol monomethyl ether (PGME), isopropyl alcohol (IPA), and methanol. VOC emissions are vented to the RTO with a control efficiency of at least 95 percent (expected range is 95 to 98+ percent).

The RTO is essential to process operations as solvents may only be applied when the RTO is in operation, as required by the Permit to Operate.

8. Is there a regular maintenance and/or inspection schedule for this equipment? Yes No

If yes, how often: daily, monthly, annual Date of last maintenance and/or inspection 2/27/2024

Describe the maintenance and/or inspection that was performed.

The facility has implemented a Preventive Maintenance Procedure (PMP) for the RTO that includes regular (daily, weekly, monthly, and annual) and physical and visual inspections of the equipment. The procedure includes, but is not limited to, instrumentation calibrations and visual checks of Maxon gas valves, natural gas pressure gauges, gas train, combustion blower, ducts, flame, and related equipment to ensure that the natural gas-fired burner is operating properly.

9. List all District rules, and/or permit conditions [indicating the specific section(s) and subsection(s)] from which you are seeking variance relief (if requesting variance from Rule 401 or permit condition, see Attachment A). Briefly explain how you are or will be in violation of each rule or condition (see Attachment A, Item 9, Example #2).

Rule	Explanation
Rule 1147(d)(1)(A)	<i>The Facility suspects that the low NOx burner is not meeting the 30 ppm limit as originally guaranteed by the manufacturer across all operating loads. NOx emissions from the low NOx burner are expected to approach 58 ppm at certain operating loads (which is still below the 60 ppm limit in Rule 1147, Table 1).</i>
Rule 1147(d)(3)(A)	<i>The Facility suspects that the low NOx burner is not meeting the 30 ppm limit as originally guaranteed by the manufacturer across all operating loads. NOx emissions from the low NOx burner are expected to approach 58 ppm at certain operating loads (which is still below the 60 ppm limit in Rule 1147, Table 1).</i>
Rule 1147(h)(13)(A)	<i>A source test will not be completed prior to the May 6, 2024 testing deadline, pending the approval of the application for modification to the existing permit to address the installation of the new low NOx burner.</i>
Permit No. G24004, Condition 1	<i>Existing permit conditions require that the operation of the equipment be conducted in accordance with all data and specifications submitted with the application under which the permit has been issued. The permit application as submitted in 2007, identifies the NOx emissions from the RTO burner at 30 ppm corrected to 3% oxygen.</i>
Rule 203	<i>Existing permit conditions require that the operation of the equipment be conducted in accordance with all data and specifications submitted with the application under which the permit has been issued. The permit application as submitted in 2007, identifies the NOx emissions from the RTO burner at 30 ppm corrected to 3% oxygen.</i>

10. Are the equipment or activities subject to this request currently under variance coverage? Yes No

Case No.	Date of Action	Final Compliance Date	Explanation

11. Are any other equipment or activities at this location currently (or within the last six months) under variance coverage? Yes No

Case No.	Date of Action	Final Compliance Date	Explanation

12. Were you issued any Notice(s) of Violation or Notice(s) to Comply concerning this equipment or activity within the past year? Yes No

If yes, you must attach a copy of each notice.

13. Have you received any complaints from the public regarding the operation of the subject equipment or activity within the last six months? Yes No

If yes, you should be prepared to present details at the hearing.

14. Explain why it is beyond your reasonable control to comply with the rule(s) and/or permit condition(s). Provide specific event(s) and date(s) of occurrence(s), if applicable.

The facility relied on the low NOx burner manufacturer guarantee of 30 ppm of NOx emissions. The facility has a regular maintenance program and has maintained the equipment to mitigate the chance of user error and ensure the low NOx burner is operating as designed. The facility performed a preliminary evaluation of the natural gas-fired burner on February 13, 2024. The results of the limited preliminary evaluation did not indicate that the low NOx burner was operating at 30 ppm during all times of operation. Upon investigating the preliminary evaluation with the manufacturer, the facility was informed that the low NOx burner could not meet the 30 ppm emissions standard or guarantee at operating levels despite the manufacturer guarantee and regular maintenance.

The facility immediately requested a guaranteed 30 ppm low NOx burner from the manufacturer. Additionally, the facility has requested a 20 ppm low NOx burner from manufacturers. However, low NOx burner manufacturers reportedly do not currently have a 20 ppm low NOx burner developed or for this type of application.

15. When and how did you first become aware that you would not be in compliance with the rule(s) and/or permit condition(s)? Provide specific event(s) and date(s) of occurrence(s).

The facility completed a preliminary evaluation of the natural gas-fired burner on February 13, 2024. The results of the evaluation did not indicate that the low NOx burner was operating at 30 ppm during all times of operation. Upon investigating the results of the preliminary limited evaluation with the manufacturer, the facility was informed that the low NOx burner could not meet the 30 ppm emissions standard or guarantee at operating levels despite the manufacturer guarantee and regular maintenance.

The facility immediately requested a guaranteed 30 ppm low NOx burner from the manufacturer. Additionally, the facility has requested a 20 ppm low NOx burner from manufacturers. However, low NOx burner manufacturers do not currently have a 20 ppm low NOx burner developed or for this application.

16. List date(s) and action(s) you have taken since that time to achieve compliance. That the Petition Form HB-V, and any related instructions, include requirement that the Petitioner include a timeline in suitable, chronological format to address the events, dates, and actions called for by Questions 15 and 16, including the dates of communication with the South Coast AQMD to notify them of the occurrence(s) giving rise to the requested variance.

February 2024:

- Completed preliminary evaluation of low NOx burner to determine NOx ppm.*
- Requested information on 20 and 30 ppm NOx burner from the current manufacturer.*
- Requested information from manufacturer on potential tuning options to achieve 30 ppm NOx emissions guarantee originally guaranteed for the burner.*

March 2024:

- Conducted conversations with SCAQMD about potential compliance options.*
- Collected quotes on new 20 and 30 ppm burners from other manufacturers.*

April 2024:

- Contracted with an environmental, health, and safety consultant to prepare the petition for variance as well as prepare permit applications for the replacement low NOx burner.*

17. What would be the harm to your business during **and/or** after the period of the variance if the variance were not granted?

Economic losses: \$ 340,000,000 in revenue per year

Number of employees laid off (if any): 200 to 300

Provide detailed information regarding economic losses, if any, (anticipated business closure, breach of contracts, hardship on customers, layoffs, and/or similar impacts).

Because the facility cannot operate the manufacturing equipment without venting to the RTO, economic losses are estimated to be \$340,000,000 per year. Additionally, an estimated 200 out of 300 employees would be affected by the losses.

If the facility was not able to operate, there could be a complete reduction or elimination of products produced, which could lead to potential breach of contracts and irreparable harm to client and consumer relationships.

18. Can you curtail or terminate operations in lieu of, or in addition to, obtaining a variance? Please explain.

The facility must operate the RTO to operate the manufacturing processes. It should be noted that the low NOx burner is only operated at full load at cold startups; it is not operated once the RTO is up and running consistently throughout the day. Emissions are tracked through fuel usage, which is already limited for the RTO, therefore, making emissions minimal. The excess emissions are the difference between 30 ppm and 60 ppm when the low NOx burner is operating.

19. Estimate excess emissions, if any, on a daily basis, including, if applicable, excess opacity (the percentage of total opacity above 20% during the variance period). If the variance will result in no excess emissions, insert "N/A" here and skip to No. 20.

Pollutant	(A)	(B)	(C)*
	Total Estimated Excess Emissions (lbs/day)	Reduction Due to Mitigation (lbs/day)	Net Emissions After Mitigation (lbs/day)
NOx	0.165	N/A	0.16

* Column A minus Column B = Column C

Excess Opacity: _____ %

20. Show calculations used to estimate quantities in No. 19, or explain why there will be no excess emissions.

*NOx emissions at 60 ppm, 77.78 lbs/MMCF of natural gas combusted.
NOx emissions at 30 ppm, 38.89 lbs/MMCF of natural gas combusted.*

Average daily fuel use, 0.00424 MMCF

*(77.78 lbs/MMCF)(0.00424 MMCF) = 0.33 lbs NOx
(38.89 lbs/MMCF)(0.00424 MMCF) = 0.165 lbs NOx*

0.33 lbs - 0.165 lbs = 0.165 lbs

21. Explain how you plan to reduce (mitigate) excess emissions during the variance period to the maximum extent feasible, or why reductions are not feasible.

Natural gas firing occurs during cold start up of the RTO system, and the low NOx burner is operated during this time. Once the RTO system is operating, the regenerative system recycles heat to maintain the operating temperature and no longer requires natural gas firing. After startup, the NOx emissions are reduced based on the burner returning to an idle mode.

To reduce excess emissions during the variance period to the maximum extent possible, the facility will operate the RTO efficiently to ensure that natural gas is only required during startup. Additionally, the facility will operate the RTO as directed by the manufacture to avoid any unnecessary shutdowns and startups that would lead to additional natural gas firing.

22. How do you plan to monitor or quantify emission levels from the equipment or activity(s) during the variance period, and to make such records available to the District? **Any proposed monitoring does not relieve RECLAIM facilities from applicable missing data requirements.**

The facility will monitor and record fuel usage during the variance period. Emissions will be calculated based on actual fuel usage.

23. How do you intend to achieve compliance with the rule(s) and/or permit condition(s)? Include a detailed description of any equipment to be installed, modifications or process changes to be made, permit conditions to be amended, etc., dates by which the actions will be completed, and an estimate of total costs.

The facility is actively working with the manufacturer to install a new low NOx burner that has a true manufacturers guarantee required by the Permit to Operate. The facility will submit a Permit to Construct Application to modify the RTO for the new low NOx burner installation. The manufacturer currently expects a 14 to 16 week lead time for the 30 ppm low NOx burner; therefore, the Permit to Construct Application and installation of the new low NOx burner are estimated for August 2024.

Estimated costs for the new low NOx burner are \$100,000 due to other retrofits that must be made to the RTO to accommodate the new low NOx burner, such as gas train upgrades.

24. State the date you are requesting the variance to begin: May 1, 2024; and the date by which you expect to achieve final compliance: 90 days up to 300 days.

If the regular variance is to extend beyond one year, you **must** include a **Schedule of Increments of Progress**, specifying dates or time increments for steps needed to achieve compliance. See District Rule 102 for definition of Increments of Progress (see Attachment A, Item 24, Example #3).

List Increments of Progress here:

N/A

25. List the names of any District personnel with whom facility representatives have had contact concerning this variance petition or any related Notice of Violation or Notice to Comply.

<u>Ryan Mansell</u>	Ext. <u>2387</u>
<u>Erwin dela Cruz</u>	Ext. <u>2528</u>
<u>Christopher Gill</u>	Ext. <u>2491</u>

If the petition was completed by someone other than the petitioner, please provide their name and title below.

<u>Bruce Ambruster</u>	<u>ALL4 Environmental CA, LLC</u>	<u>Directing Consultant</u>
Name	Company	Title

The undersigned, under penalty of perjury, states that the above petition, including attachments and the items therein set forth, is true and correct.

Executed on 4/23/2024, at Irvine, California

<u>[Signature]</u>	<u>David B. Goldinger</u>
Signature	Print Name

Title: Plant Director

26. **SMALL BUSINESS and TABLE III SCHEDULE A FEES:** To be eligible for reduced fees for small businesses, individuals, or entities meeting small business gross receipts criterion [see District Rule 303(h)], you must complete the following:

[YOU MAY ATTACH ADDITIONAL PAGES IF NECESSARY]

Declaration Re Reduced Fee Eligibility

1. The petitioner is
- a) an individual, or
 - b) an officer, partner or owner of the petitioner herein, or a duly authorized agent of the petitioner authorized to make the representations set forth herein.

If you selected 1a, above, skip item 2.

2. The petitioner is
- a) a business that meets the following definition of Small Business as set forth in District Rule 102:
SMALL BUSINESS means a business which is independently owned and operated and meets the following criteria, or if affiliated with another concern, the combined activities of both concerns shall meet these criteria:
 - (a) the number of employees is 10 or less; **AND**
 - (b) the total gross annual receipts are \$500,000 or less or
 - (iii) the facility is a not-for-profit training center.

-OR-

- b) an entity with total gross annual receipts of \$500,000 or less.

3. Therefore, I believe the petitioner qualifies for reduced fees for purpose of filing fees and excess emission fee calculations, in accordance with Rule 303(h).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on _____, at _____, California

Signature _____

Print Name _____

Title _____

ATTACHMENT A

ITEM 1

Type of Variance Requested:

- (a) **SHORT:** If compliance with District rule(s) can be achieved in **90 days or less**, request a short variance. *(Hearing will be held approximately 21 days from date of filing—10-day posted notice required.)*
- (b) **REGULAR:** If compliance with District rule(s) will take **more than 90 days**, request a regular variance. If the variance request will extend beyond one year, you **must** include a specific detailed schedule of increments of progress [see Page 8, No. 24] under which you will achieve final compliance. *(Hearing will be held approximately 45 days from date of filing—30-day published notice required.)*
- (c) **EMERGENCY:** If non-compliance is the result of an unforeseen emergency, such as a sudden equipment breakdown, power failure, or accidental fire, you may request an emergency variance. You may request an *ex parte* emergency variance in addition to an emergency variance. **An emergency variance cannot be granted for more than 30 days.** *(Hearing will be held within 2 working days from the date of filing, whenever possible, excluding Mondays, weekends, and holidays.) If you request an emergency variance, you must answer No. 4 on page 1.*
- (d) **EX PARTE EMERGENCY:** If variance coverage is required on a weekend or when the Board is not in session, and you cannot wait until an emergency variance hearing can be held, you may request an *ex parte* emergency variance. An *ex parte* emergency variance will be granted or denied solely on the information contained in the petition and the District's response to the petition. Under most

circumstances, an *ex parte* emergency variance will remain in effect only until a hearing can be held. **If you request an *ex parte* variance, you must answer No. 4 on page 1.**

- (e) **INTERIM:** If you require immediate relief (other than for emergencies) to cover the time until a short or regular variance hearing can be held, request an interim variance. If you request an interim variance, you must also request a short or a regular variance on the same petition. *(Hearing will be held approximately 2 working days from date of filing, whenever possible, excluding Mondays, weekends and holidays.)* **If you request an interim variance, you must answer No. 4 on page 1.**

ITEM 4

GOOD CAUSE: The Hearing Board is required to provide public notice of variance hearings, as the public has a right to attend and testify at such hearings. In order for the Hearing Board to hold an Interim, *Ex Parte* Emergency or Emergency Variance hearing without the required public notice, a petitioner must present facts which will support a determination by the Board that "good cause" exists to hear a variance without notifying the public about the variance and providing the public with an opportunity to present evidence concerning the variance.

ITEM 6

Example #1:

Equipment/Activity	Application/Permit No.	RECLAIM Device No.	Date Application/Plan Denied (if relevant)*
Tenter frame		D32	
Chrome-plating tank	M99999		
Bake oven	123456		
Create special effects (fog)	N/A	N/A	N/A
Mfg., sale, distribution, use of non-compliant coating	N/A	N/A	12/10/95

ITEM 9

- a) If you are requesting relief from Rule 401 and the excess opacity during the variance period will reach or exceed 40%, you should also request relief from California Health and Safety Code Section 41701.
- b) If you are requesting relief from a permit condition(s), you should also request relief from the rule requiring compliance with conditions of the permit: 202(a), (b) or (c) - Temporary Permit to Operate; 203(b) - Permit to Operate; 2004(f)(1) - RECLAIM Permit; 3002(c) - Title V Permit.

Example #2:

Rule	Explanation
404(a)	tenter frame is vented to damaged air pollution control equipment
2004 (f)(1) [Condition No. 28-2 of Facility P/O No. 099999]	source test cannot be conducted as required until new ESP is installed
1113(c)(2)	petitioner manufactures and sells clear wood finishes with VOCs in excess of 350 grams per liter
401(a) & California H&S Code Section 41701	Opacity will exceed 45%.

ITEM 24

[YOU MAY ATTACH ADDITIONAL PAGES IF NECESSARY]



PERMIT TO OPERATE

This initial permit must be renewed ANNUALLY unless the equipment is moved, or changes ownership.
If the billing for the annual renewal fee (Rule 301.f) is not received by the expiration date, contact the District.

Legal Owner
or Operator:

3M ESPE DENTAL PRODUCTS DIVISION
2111 MC GAW AVE, ATTN: BRIAN IZUHARA
IRVINE, CA 92614

ID 13563

Equipment Location: 2111 MCGAW AVE, IRVINE, CA 92614-0908

Equipment Description :

AIR POLLUTION CONTROL SYSTEM CONSISTING OF:

1. REGENERATIVE THERMAL OXIDIZER, CATALYTIC PRODUCTS, MODEL TRITON 4.95, TWO CERAMIC BEDS, WITH ONE BURNER, MAXON, MODEL KINEDIZER, 900,000 BTU PER HOUR, NATURAL GAS FIRED AND 3 H.P. COMBUSTION AIR BLOWER.
2. EXHAUST SYSTEM WITH 25 HP. BLOWER VENTING TWO SPRAY DRYERS, A NAUTILUS COATING AND DRYING SYSTEM, AND FIVE OVENS (RULE 219 EXEMPT).

Conditions :

1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN ACCORDANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.
2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
3. THIS EQUIPMENT SHALL BE FIRED WITH NATURAL GAS ONLY.
4. THIS EQUIPMENT SHALL COMPLY WITH THE REQUIREMENTS OF RULE 1147.
5. THE OPERATOR SHALL INSTALL AND MAINTAIN A TEMPERATURE MEASURING DEVICE TO ACCURATELY INDICATE AND RECORD THE TEMPERATURE IN THE AFTERBURNER.
6. A TEMPERATURE OF NOT LESS THAN 1,500 DEGREES FAHRENHEIT SHALL BE MAINTAINED IN THE AFTERBURNER WHEN THE EQUIPMENT IT SERVES IS IN OPERATION.

FILE COPY



PERMIT TO OPERATE

7. TO MAINTAIN EXEMPTION FROM THE TITLE V REQUIREMENTS, THE TOTAL QUANTITY OF VOC EMISSIONS FROM THIS FACILITY SHALL BE LESS THAN 1,666 POUNDS IN ANY CALENDAR MONTH. IF THE RECORDS GENERATED AFTER THE END OF ANY CALENDAR MONTH SHOW THAT THE TOTAL FACILITY VOC EMISSIONS FOR THE CALENDAR MONTH EXCEED THE EMISSION LIMIT OF THIS CONDITION, THE OPERATOR SHALL SUBMIT AN INITIAL TITLE V PERMIT APPLICATION AND OBTAIN A TITLE V PERMIT PURSUANT TO THE REQUIREMENTS SPECIFIED IN RULE 3003. EXCEEDANCE OF THE VOC EMISSION LIMIT OF THIS CONDITION SHALL NOT SUBJECT ANY EQUIPMENT AT THIS FACILITY TO NEW SOURCE REVIEW REQUIREMENTS IF THE OPERATOR COMPLIES WITH ALL OTHER PERMIT CONDITIONS THAT ARE APPLICABLE TO SUCH EQUIPMENT.
8. TO ENSURE COMPLIANCE WITH THE EMISSION LIMIT OF THIS PERMIT, THE OPERATOR SHALL:
 - A. COMPLY WITH RULE 109 (RECORDKEEPING FOR VOLATILE ORGANIC COMPOUND EMISSIONS).
 - B. WITHIN 14 CALENDAR DAYS AFTER THE END OF EACH CALENDAR MONTH, TOTAL AND RECORD VOC EMISSIONS FOR THE CALENDAR MONTH FROM ALL EQUIPMENT AND OPERATIONS THAT ARE REQUIRED TO HAVE WRITTEN PERMITS OR ARE EXEMPT FROM WRITTEN PERMITS PURSUANT TO RULE 219. THE RECORD SHALL INCLUDE ANY PROCEDURES USED TO ACCOUNT FOR CONTROL DEVICE EFFICIENCIES AND/OR WASTE DISPOSAL. IT SHALL BE SIGNED AND CERTIFIED FOR ACCURACY BY THE HIGHEST RANKING INDIVIDUAL RESPONSIBLE FOR COMPLIANCE WITH DISTRICT RULES.
 - C. MAINTAIN A SINGLE LIST WHICH INCLUDES ONLY THE NAME AND ADDRESS OF EACH PERSON FROM WHOM THE FACILITY ACQUIRED VOC-CONTAINING MATERIAL REGULATED BY THE DISTRICT THAT WAS USED OR STORED AT THE FACILITY DURING THE PRECEDING 12 MONTHS.
 - D. RETAIN ALL PURCHASE INVOICES FOR ALL VOC-CONTAINING MATERIAL USED OR STORED AT THE FACILITY, AND ALL WASTE MANIFESTS FOR ALL WASTE VOC-CONTAINING MATERIAL REMOVED FROM THE FACILITY.
9. THE OPERATOR SHALL MAINTAIN ADEQUATE RECORDS TO VERIFY COMPLIANCE WITH CONDITION NO. 6 ABOVE. ALL RECORDS REQUIRED BY THIS PERMIT SHALL BE PREPARED IN A FORMAT WHICH IS ACCEPTABLE TO THE DISTRICT, RETAINED AT THE FACILITY FOR A MINIMUM OF FIVE YEARS, AND MADE AVAILABLE TO ANY DISTRICT REPRESENTATIVE UPON REQUEST.

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South Coast Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178

Page 3
Permit No.
G24004
A/N 535931

PERMIT TO OPERATE

NOTICE

IN ACCORDANCE WITH RULE 206, THIS PERMIT TO OPERATE OR COPY SHALL BE POSTED ON OR WITHIN 8 METERS OF THE EQUIPMENT.

THIS PERMIT DOES NOT AUTHORIZE THE EMISSION OF AIR CONTAMINANTS IN EXCESS OF THOSE ALLOWED BY DIVISION 26 OF THE HEALTH AND SAFETY CODE OF THE STATE OF CALIFORNIA OR THE RULES OF THE AIR QUALITY MANAGEMENT DISTRICT. THIS PERMIT CANNOT BE CONSIDERED AS PERMISSION TO VIOLATE EXISTING LAWS, ORDINANCES, REGULATIONS OR STATUTES OF OTHER GOVERNMENT AGENCIES.

EXECUTIVE OFFICER

A handwritten signature in black ink that reads "Dorris M. Bailey".

By Dorris M. Bailey/ED02

4/16/2013

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