

DRAFT

Permit Evaluation Report

Limpic's Custom Woodworks
2371 Pine Street, Suite # 105
Napa Ca, 94559

Application NO. 10167
Plant NO. 16239

Background:

Limpic's Custom Woodworks has submitted this application for a Permit to operate the following equipment/operation:

S-1 Spray Booth, Golden West, HVLP spray gun.

Limpic's Custom Woodworks manufactures custom wood cabinets for kitchen, bathroom etc.

Emissions:

The emission summary for this sure (S-1) is in the following table:

Table 1, Usage and Emissions

Coating Description	Usage (Gal/y)	VOC Content (lb/gal)	POC Emission Lb/day	POC emission (tpy)
Primer, Clawlock, w370	50	4.78	1.6	
Primer, Kristal sealer, C156	75	5.09	2.5	
Top coat (Kristal sealer, C156)	75	4.63	2.3	
Top coat (Resistaant,W371)	50	4.18	1.39	
Cleanup Solvent	20	6.5	0.87	
Total	270	-----	8.7	0.65

- Maximum Daily Average Emissions:
 $POC = (1,305 \text{ lb/y}) / (150 \text{ d/y}) = 8.7 \text{ lb/d}$
- Plant Cumulative Increase:
 $POC = 0.00 \text{ tpy (existing)} + 0.65 \text{ tpy (new)} = 0.65 \text{ tpy}$
- Toxics: the amount of toxic air contaminants from coatings operations at this facility does not trigger toxic health risk screening.

Statement of compliance:

The spray booth (S-1) is subject to and in compliance with District Regulation 8, Rule 32, and Section 301, 302 and 303.

This project is considered to be ministerial under the District's CEQA regulation 2-1-311 and therefore is not subject to CEQA review (PHBK Chapter 5). The engineering review for this project requires only the application of standard permit conditions and standard emissions factors and therefore is not discretionary as defined by CEQA.

BACT:

This operation has the potential to emit less than 10 pounds of POC per day, therefore does not trigger BACT requirements.

Offsets:

POC Offsets are not applicable since the facility wide emissions are less than 15 tons per year.

Public Notification:

There is a school¹ within 1000 feet of this company; therefore public notification contained in Regulation 2-1-412 is required.

Conditions for S-1(Paint Spray Booth):

1. Net usage of coating at S-1 shall not exceed the following limits, in any consecutive twelve-month period:
 - a. Coatings 250 gallons
 - b. Cleanup Solvent 20 gallons(basis: Cumulative Increase)

2. Except as allowed in Condition No.2, coatings and cleanup solvents other than the materials specified in Condition 1, and/or usages in excess of those specified in Condition 1, may be used at S-1, provided that the owner/operator can demonstrate that both of the following are satisfied:
 - a. Total emissions of POC from S-1, do not exceed **1,300** pounds in any consecutive twelve month period; and
 - b. Total emissions of NPOC and/or POC from S-1 do not exceed **1,300** pounds in any consecutive twelve-month period; and
 - c. The use of these materials does not increase toxic emissions above any risk screening trigger level.(basis: Cumulative Increase; Toxic Risk Screen)

3. In order to demonstrate compliance with the above conditions, the following records shall be maintained by the owner/operator in a District approved log. These records shall be kept on Site and made available for District inspection for a period of 24 months from the date on which a record is made.

¹ See enclosed school program print out results.

- a. Type and monthly usage of all POC and/or NPOC containing materials used;
- b. If a material other than those specified in Condition 1 is used, POC, NPOC and toxic component contents of each material used; and mass emission calculations to demonstrate compliance with Condition 2, on a monthly basis;
- c. Monthly usage and/or emission calculations shall be totaled for each consecutive twelve-month period.
(basis: Cumulative Increase; Toxic Risk Screen)

* End of permit conditions *

Exemption:

None

Recommendation:

Issue a Permit to Operate for the following source:

S-1 Spray Booth, Golden West, HVLP spray gun.

By:

Mohamad Moazed

August 17, 2004