

## **TELEWAVE, INC.**

Modification to  
S-1 Paint Spray Operation

Application #22232

October 20, 2010

### **INTRODUCTION**

Telewave, Inc. (Telewave) is applying for a modification Permit to Operate:

#### **S-1 Paint Spray Operation**

at their facility in San Jose, CA.

Telewave primes and coats aluminum tubing used in the construction of two-way radio systems. They are requesting an increase in coating usage from 30 to 125 gal/year and clean-up usage from 15 to 25 gal/year.

### **EMISSIONS**

Telewave is requesting to use 125 gal/yr of polyurethane topcoat (2.8 lb/gal). They have discontinued the use of primer. 25 gal/yr of acetone will be used as clean-up. The only Table 2-5-1 toxic compounds are methyl ethyl ketone (MEK) of which there is a maximum 5% by weight in the coatings and ethyl benzene (0.1% by weight):

#### **POC Emissions**

$(125 - 30 \text{ gal/yr})(2.8 \text{ lb/gal}) = 266 \text{ lb/yr}$  **(0.133 tpyPOC)**

#### **NPOC Emissions**

$(25-15 \text{ gal/yr})(100\% \text{ acetone})(6.6 \text{ lb/gal}) = 66 \text{ lb/yr}$  **(0.033 tpy NPOC)**

**Total Acetone Emissions: 66 lb/yr**

## **Toxic Air Contaminants**

The attached table shows the total toxic air contaminants (TACs) associated with this operation; a toxic risk screen is not triggered.

### **Plant Cumulative**

POC = 0.044 tpy (existing) + 0.133 tpy (new) = 0.177 tpy

NPOC = 0.050 tpy (existing) + 0.033 tpy (new) = 0.083 tpy

## **STATEMENT OF COMPLIANCE**

S-1 Paint Spray Operation will continue to comply with Regulation 8-19-302.2 standards for air-dried coatings: Coating VOC content does not exceed 2.8 lb/gal.

Components of individual coatings do not trigger a toxics risk screening analysis: methyl ethyl ketone does not exceed the toxic trigger levels of 29 lb/hour and 39,000 lb/year and ethyl benzene does not exceed the toxic trigger level of 43 lb/year. A toxics risk screen is not required.

The project is within 1000 feet of the nearest school and therefore the owner/operator is subject to the public notification requirements of Reg. 2-1-412. A public notice was prepared and sent on XX/XX/XXXX. The public notices were sent to:

All addresses within ¼ mile of the modified operation:

Parents and guardians of students at Independence High School and Pegasus High School both located at 1776 Educational Park Drive, San Jose, CA.

At the end of the comment period, which lasted for more than 30 days, there were XXX written comments, XXX phone-mail messages and XXX e-mail messages received from residents, businesses, and parents of students at Independence High School and Pegasus High School.

This application is considered to be ministerial under the District's CEQA Regulation 2-1-311 because the evaluation is a ministerial action conducted using the fixed standards and objective measurements outlined in the District's Permit Handbook, Chapter 5.1.

BACT, NSR, Offsets, PSD, NSPS, and NESHAPS are not triggered.

## RECOMMENDATION

Issue a modification to the Permit to Operate for:

S-1 Paint Spray Operation, Golden West Spray Booth Co., model DB88

## PERMIT CONDITIONS

Permit conditions for S-1 at Plant no. 13429, as amended by A#22232, October 20, 2010:

1. ~~Coating usage~~ Owner/operator shall not exceed ~~31.2~~ 125 gallons of ~~primer and topcoat~~ usage in any consecutive 12-month period. [Basis: cumulative increase]
2. ~~Coatings~~ Owner/operator shall not be ~~thinned~~ or reduced coatings such that the allowable VOC limits of 2.8 lb/gal. specified in Regulation 8-19-302.2 are exceeded. [Basis: Regulation 8-19-302.2]
3. ~~Clean-up solvent usage~~ Owner/operator shall not exceed ~~15~~ 25 gallons of acetone in any consecutive 12-month period. [Basis: cumulative increase]
4. Owner/operator shall maintain a A current list of coatings in use, which provides all of the data necessary to evaluate compliance, shall be maintained including the following information, as applicable:
  - a. MSDS, coating, catalyst, and reducer used
  - b. mix ratio of components
  - c. VOC content of coating as applied
  - d. solids content of each [Regulation 8-19-501]
5. Owner/operator shall maintain a A District approved logbook ~~shall be maintained~~ on a weekly basis of:
  - a. coating and mix ratio of the components in the coating used
  - b. quantity of each coating applied
  - c. identification of coating category

The type and amount of clean-up solvent used shall be maintained on a monthly basis.

Records shall be maintained for a period of at least 2 years from the date of entry and made readily available to District staff upon request. [Basis: recordkeeping]

