ENGINEERING EVALUATION
Facility ID No. 19692
Mission Bell Manufacturing
16100 Jacqueline Court, Morgan Hill, CA 95037
Application No. 728531

Background

Mission Bell Manufacturing ("facility" hereafter) has applied for an Authority to Construct/Permit to Operate (ATC/PTO) for the following equipment:

S-5 Spray Booth with Curing Oven, Make/Model: PFS-SDD-27/M1, Flow rate: 16,262 cubic feet per minute (CFM), Natural Gas Heater, M1, 0.5 MMBtu/hr

S-6 Spray Booth, Make/Model: PFS-OFSB-18, Flow rate: 14,400 CFM

Additionally, the facility has applied for a modification for the following source:

S-1 Spray Booth with Curing Oven, Make: Golden West, Model: DSD 3040PDT, Flow Rate: 34,100 CFM, Natural Gas Heater, 2.07 MMBtu/hr

A notice of violation (NOV) No. A64244 was issued on 5/19/2025 for the installation of two spray booths (S-5 and S-6) without an ATC. S-5 and S-6 are replacements for the facility's current sources S-2 and S-3. S-2 and S-3 have been shut down. In accordance with Regulation 2-1-232.4, any replacement of a source is considered a new source. Sources S-5 and S-6 are used for coating custom cabinets and millwork.

As part of this application, 42 paints and solvents were evaluated and the combined paints/solvent usage limits currently stated in Condition #24378, Part 1, will be separated and assigned individually to each source. The current permitted limits for S-1, S-2, and S-3 are shown in the table below.

Table 1. Previous Combined Coating Limits for S-1, S-2, and S-3

Product Group	Usage (gal/yr)	VOC Limit (lb/gal)	NPOC Limit (lb/gal)
Stain	130	2.9	--
Adhesive	595	2.03	--
Coatings	4,005	1.05	--
Cleanup Solvent	480	--	6.6

1. *Usage, VOC, and NPOC limits per Condition #24378 Part 1.*

Emissions Summary

There will be emissions of criteria air pollutants namely precursor organic compounds (POCs), non-precursor organic compounds (NPOCs), and particulate matter (PM_{10} and $PM_{2.5}$) from coating operations. The spray coating operations will release toxic air contaminants (TACs) based on the proposed stains, coatings, and solvents. In addition,

the curing ovens will also release combustion emissions of nitrogen oxides (NO_x), carbon monoxide (CO), sulfur dioxide (SO_2), POC, PM_{10}, and $PM_{2.5}$.

Emissions from the coating operation are calculated using the material balance methods for POC and NPOC in accordance with the Air District's revised Permit Handbook Chapter 5.1, Spray Booths and Spray Guns. Annual and maximum daily emissions of POC, NPOC, PM_{10} and $PM_{2.5}$ are based on the annual and maximum daily material usage for each type of product. Combustion emissions are calculated using AP-42, Chapter 1.4 emission factors for natural gas combustion in external combustion sources.

The facility uses over 40 different types of products in the spray booths. Each product is categorized as a stain, coating, or solvent. POC and NPOC emissions are quantified using the material balance method. Emissions use the maximum density, POC and NPOC content, and throughput for each product group. The amount of POCs emitted into the atmosphere is assumed to be 100% of the amount contained in the coating material. The table below summarizes the types and amounts of coatings used at the facility.

Table 2. New Annual Usage Limits

Product Group	S-1 Usage (gal/year)	S-5 Usage (gal/year)	S-6 Usage (gal/year)
High VOC Stains (>0.63 and ≤ 1 lb/gal)	225	225	50
Low VOC Stains (≤0.63 lb/gal)	675	525	150
High VOC Coatings (>1.55 and ≤ 2.25 lb/gal)	850	625	250
Medium VOC Coatings (>0.51 and ≤ 1.55 lb/gal)	850	625	250
Low VOC Coatings (≤0.51 lb/gal)	1,700	1,250	500
Solvents (≤6.61 lb/gal)	750	375	100

Table 3. New Daily Usage Limits

Product Group	S-1 Usage (gal/day)	S-5 Usage (gal/day)	S-6 Usage (gal/day)
Stains	6.00	3.00	1.00
Coatings	15.00	11.00	4.00
Cleanup Solvents	3.00	2.00	1.00

Table 4. New Hourly Usages

Product Group	S-1 Usage (gal/hr)	S-5 Usage (gal/hr)	S-6 Usage (gal/hr)
Stains	1.00	1.00	0.50
Coatings	2.00	1.00	0.50
Cleanup Solvents	1.00	1.00	0.25

Appendix A provides a detailed list of the proposed paints and their properties, including classifications, density, POC content, NPOC content, solids content, and TAC profiles. The table below summarizes the product groups based on each paint's description.

Table 5. Product Group Summary

Product Group	Max. Density[1] (lb/gal)	Max. POC[1] (lb/gal)	Max. NPOC[1] (lb/gal)	Max. Solids by Weight (%)
High VOC Stains	8.37	1.00	0.025	4.10%
Low VOC Stains	8.35	0.63	0.025	1.00%
High VOC Coatings	8.84	2.25	1.77	59.33%
Medium VOC Coatings	10.42	1.55	0.09	32.50%
Low VOC Coatings	12.60	0.51	0.38	70.00%
Solvents	6.61	6.61	6.59	0.00%

1. *All paint properties are from material safety data sheets (MSDS), environmental data sheets (EDS), and product data sheets (PDS) provided by the applicant.*

Table 6. POC and NPOC Emissions from S-1

Pollutant	POC				NPOC			
	Hourly Emissions[1] (lb/hour)	Daily Emissions[1,2] (lb/day)	Annual Emissions (lb/year)	Annual Emissions (tpy)	Hourly Emissions[1] (lb/hour)	Daily Emissions[1] (lb/day)	Annual Emissions (lb/year)	Annual Emissions (tpy)
High VOC Stains	1.00	6.00	225.00	0.113	0.03	0.15	5.63	0.003
Low VOC Stains	--	--	425.25	0.213	--	--	16.88	0.008
High VOC Coatings	4.50	33.75	1,912.50	0.956	3.54	26.52	1,504.50	0.752
Medium VOC Coatings	--	--	1,319.24	0.660	--	--	76.50	0.038
Low VOC Coatings	--	--	867.00	0.434	--	--	646.00	0.323
Solvents	6.61	19.83	4,957.50	2.479	6.59	19.77	4,942.50	2.471
Total	**12.11**	**59.58**	**9,706.49**	**4.853**	**10.16**	**46.44**	**7,192.00**	**3.596**

Basis:

- [1]Hourly and daily emissions use the worst-case scenarios instead of the tiered usage method.
- [2] An example calculation for the max. daily POC emissions are shown below:

$$POC\ Emissions\ \left(\frac{lb}{day}\right) = \left(VOC\ Content\ \frac{lb}{gal}\right) \times \left(Max.Daily\ Throughput\ \frac{gal}{day}\right)$$

$$POC\ Emissions\ \left(\frac{lb}{day}\right) = \left(2.25\ \frac{lb\ VOC}{gal\ coating}\right) \times \left(15.0\ \frac{gal\ coatings}{day}\right) = 33.75\ lb/day$$

S-1 has a natural gas-fired curing oven. Emissions from natural gas combustion are represented in this table.

S-1 Oven:

- Maximum Firing Rating: 2.07 MMBtu/hr
- Heating Value of Natural Gas: 1,050 MMBtu/MMscf
- Operation Hours: (12 hrs/day) x (6 days/week) x (52 weeks/year) = 3,744 hours/year
- Maximum Fuel Consumption:
  Hourly: 1971.43 scf/hour
  Annual: 7,381.03 Mcf/year

Table 7. Emissions of Criteria Pollutants for Curing Oven at S-1

Pollutant	Emission Factors	Daily Emissions	Annual Emissions Total	
	(lb/MMscf)	(lb/day)	(lb/yr)	(tpy)
NOx	100	4.73	738.10	0.369
POC	5.5	0.26	40.60	0.020
CO	84	3.97	620.01	0.310
PM_{10}	7.6	0.36	56.10	0.028
$PM_{2.5}$[3]	7.6	0.36	56.10	0.028
SO_2	0.6	0.03	4.43	0.002

Basis:

- [1]Emission factors per AP-42, Tables 1.4-1 and 1.4-2, Small Boilers (<100 MMBtu/hr) Uncontrolled.
- [2]Daily emissions are based on a 24-hour day.
- [3]$PM_{2.5}$ emissions are assumed to be the same as PM_{10}.
- An example calculation for the max. daily POC emissions are shown below:

$$POC\ \left(\frac{lb}{day}\right) = \left(Emission\ Factor\ \left(\frac{lb}{MMscf}\right)\right) \times \left(\text{Hourly Usuage}\ \left(\frac{\text{scf}}{\text{hr}}\right)\right) \times \left(\frac{1\ \text{MMscf}}{10^6\ scf}\right) \times \left(Daily\ Operation\ \left(\frac{hr}{day}\right)\right)$$

$$POC\ \left(\frac{lb}{day}\right) = \left(5.5\left(\frac{lb}{MMscf}\right)\right) \times \left(1{,}971\ \left(\frac{\text{scf}}{\text{hr}}\right)\right) \times \left(\frac{1\ \text{MMscf}}{10^6\ scf}\right) \times \left(24\ \left(\frac{hr}{day}\right)\right) = 0.26\ lb/day$$

Table 8. POC and NPOC Emissions from S-5

Pollutant	POC				NPOC			
	Hourly Emissions (lb/hour)	Daily Emissions[1] (lb/day)	Annual Emissions (lb/year)	Annual Emissions (tpy)	Hourly Emissions (lb/hour)	Daily Emissions (lb/day)	Annual Emissions (lb/year)	Annual Emissions (tpy)
High VOC Stains	1.00	3.00	225.00	0.113	0.03	0.08	5.63	0.003
Low VOC Stains	--	--	330.75	0.165	--	--	13.13	0.007
High VOC Coatings	2.25	24.75	1,406.25	0.703	1.77	19.47	1,106.25	0.553
Medium VOC Coatings	--	--	970.03	0.485	--	--	56.25	0.028
Low VOC Coatings	--	--	637.50	0.319	--	--	475.00	0.238
Solvents	6.61	13.22	2,478.75	1.239	6.59	13.18	2,471.25	1.236
Total	**9.86**	**40.97**	**6,048.28**	**3.024**	**8.39**	**32.73**	**4,127.50**	**2.065**

S-5 Oven

- Maximum Firing Rating: 0.50 MMBtu/hr
- Heating Value of Natural Gas: 1,050 MMBtu/MMscf
- Operation Hours: (12 hrs/day) x (6 days/week) x (52 weeks/year) = 3,744 hr/yr
- Maximum Fuel Consumption:
  Hourly: 476.2 scf/hour
  Annual: 1,782.86 Mscf/year

Table 9. Emissions of Criteria Pollutants for Curing Oven at S-5

Pollutant	Emission Factors[1]	Daily Emissions[2]	Annual Emissions Total	
	(lb/MMscf)	(lb/day)	(lb/yr)	(tpy)
NOx	100	1.14	178.29	0.089
POC	5.5	0.06	9.81	0.005
CO	84	0.96	149.76	0.075
PM_{10}	7.6	0.09	13.55	0.007
$PM_{2.5}$[3]	7.6	0.09	13.55	0.007
SO_2	0.6	0.01	1.07	0.001

Basis:

- [1]Emission factors per AP-42, Tables 1.4-1 and 1.4-2, Small Boilers (<100 MMBtu/hr) Uncontrolled.
- [2]Daily emissions are based on a 24-hour day.
- [3]$PM_{2.5}$ emissions are assumed to be the same as PM_{10}.
- Emissions calculations use the same methodology as S-1 curing oven.

S-6 uses the same calculation methodology as S-1 and S-5. Emissions from S-6 are represented in the table below.

Table 10. POC and NPOC Emissions from S-6

Pollutant	POC				NPOC			
	Hourly Emissions (lb/hr)	Daily Emissions[1] (lb/day)	Annual Emissions (lb/yr)	Annual Emissions (tpy)	Hourly Emissions (lb/hr)	Daily Emissions (lb/day)	Annual Emissions (lb/yr)	Annual Emissions (tpy)
High VOC Stains	0.50	1.00	50.00	0.025	0.01	0.03	1.25	0.001
Low VOC Stains	--	--	94.50	0.047	--	--	3.75	0.002
High VOC Coatings	1.13	9.00	562.50	0.281	0.89	7.08	442.50	0.221
Medium VOC Coatings	--	--	388.01	0.194	--	--	22.50	0.011
Low VOC Coatings	--	--	255.00	0.128	--	--	190.00	0.095
Solvents	1.65	6.61	661.00	0.331	1.65	6.59	659.00	0.330
Total	**3.28**	**16.61**	**2,011.01**	**1.006**	**2.55**	**13.69**	**1,319.00**	**0.660**

The spraying process at S-1, S-5, and S-6 will also generate PM_{10} and $PM_{2.5}$ emissions from the overspray of solids contained in the coating. $PM_{10}/PM_{2.5}$ emissions were estimated as follows:

$$PM\ Emissions = \left(Amount\ of\ coating\ used\ \frac{gal}{yr}\right) \times \left(\text{Density of Coating}\ \frac{\text{lb}}{\text{gal}}\right) \times \left(Solids\ Content\ (\%\ wt.)\right) \times (1 - Transfer\ Efficiency) \times (1 - Filter\ Efficiency)$$

A default transfer efficiency of 30% as proposed in Permit Handbook Chapter 5.1 and a default filter efficiency of 90% was used to estimate $PM_{10}/PM_{2.5}$ emissions. Particulate or solid TAC emissions were assumed to be all emitted from the spray booth. A summary of $PM_{10}/PM_{2.5}$ emissions is shown in the table below.

Table 11. PM_{10} and $PM_{2.5}$ Emissions from Spray Booths

Pollutant	S-1		S-5		S-6	
	Daily Emissions (lb/day)	Annual Emissions (tpy)	Daily Emissions (lb/day)	Annual Emissions (tpy)	Daily Emissions (lb/day)	Annual Emissions (tpy)
High VOC Stains	0.14	0.003	0.07	0.003	0.02	0.001
Low VOC Stains	--	0.002	--	0.002	--	0.000
High VOC Coatings	5.51	0.156	4.04	0.115	1.47	0.046
Medium VOC Coatings	--	0.101	--	0.074	--	0.030
Low VOC Coatings	--	0.525	--	0.386	--	0.154
Solvents	0.00	0.000	0.00	0.000	0.00	0.000
Total	**5.65**	**0.787**	**4.11**	**0.579**	**1.49**	**0.231**

Basis:

- $PM_{10}/PM_{2.5}$ emissions use the throughputs, densities, and solids content provided in Tables 2, 3 and 5.
- Daily emissions use the worst-case scenarios instead of the tiered usage method.
- Conservative Assumption: All PM_{10} emissions are $PM_{2.5}$

A summary of POC, NPOC and $PM_{10}/PM_{2.5}$ emissions from the project are represented in the table below.

Table 12. Project Emissions

Spray Booth	POC Emissions			NPOC Emissions			$PM_{10}/PM_{2.5}$ Emissions		
	Hourly (lb/hr)	Daily (lb/d)	Annual (tpy)	Hourly (lb/hr)	Daily (lb/d)	Annual (lb/yr)	Hourly (lb/hr)	Daily (lb/d)	Annual (tpy)
S-1	12.12	59.84	4.874	10.16	46.47	3.596	0.77	6.01	0.814
S-5	9.86	41.03	3.029	8.39	32.73	2.064	0.39	4.20	0.586
S-6	3.28	16.61	1.006	2.55	13.70	0.660	0.20	1.49	0.231
Total	25.26	117.48	8.908	21.10	92.90	6.320	1.36	11.70	1.631

Note: Project emissions include coating operations and the combustion of natural gas from the curing ovens.

Toxic Emissions for Health Risk Assessment

The MSDSs for each product group (stains, coatings, and solvents) were evaluated to determine whether they contain TACs listed under Air District Regulation 2-5. The table below provides the maximum contents of TACs from each product group.

Table 13. Worst Case TAC Profile for each Product Group

TAC	Max. Concentrations Stains (%)	Max. Concentrations Coatings (%)	Max. Concentrations Solvents (%)
Lead	0.000%	0.0008%	0.00%
Ethylene Glycol Butyl Ether (EGBE)	0.000%	4.00%	0.00%
Isopropyl Alcohol (IPA)	0.000%	2.52%	0.00%
Triethylamine	0.000%	1.50%	0.00%
Phosphoric acid	0.000%	0.14%	0.00%
Propylene glycol monomethyl ether	0.000%	0.00%	90.00%
Methanol	0.000%	0.00%	5.00%
Xylene	0.000%	1.00%	0.00%
Ethylbenzene	0.000%	0.30%	0.00%
Formaldehyde[1]	0.000%	0.10%	0.00%
Toluene[1]	0.000%	0.00%	0.00%
Benzene[1]	0.000%	0.00%	0.00%

1. *Benzene, formaldehyde and toluene are also emitted from combustion of natural gas at S-1 and S-5 ovens*

TAC emissions are calculated using the maximum density, the hourly and annual throughputs, and maximum concentration of each TAC for each product group. An example of the hourly TAC emissions is as follows:

$$TAC\ Emissions = \left(Coating\ Density \frac{lb}{gal} \times \text{Throughput} \frac{\text{gal}}{\text{hr}} \times Concentration\ (\%) \right)_{Stains} + \left(Coating\ Density \frac{lb}{gal} \times \text{Throughput} \frac{\text{gal}}{\text{hr}} \times Concentration\ (\%) \right)_{Coatings} + \left(Coating\ Density \frac{lb}{gal} \times \text{Throughput} \frac{\text{gal}}{\text{hr}} \times Concentration\ (\%) \right)_{Solvents} +$$

Table 14. Project TAC Emissions for S-1, S-5, and S-6

TAC	Hourly Emissions (lb/hr)	Acute Trigger Limit (lb/hr)	Annual Emissions (lb/yr)	Chronic Trigger Limit (lb/yr)	HRA Triggered? (Y/N)
Mercury	6.52E-07	2.70E-04	2.44E-03	2.10E-01	N
Lead	3.54E-04	-	7.00E-01	2.90E-01	Y
EGBE	1.76E+00	2.10E+00	3.48E+03	3.20E+03	Y
IPA	1.11E+00	1.40E+00	2.19E+03	2.70E+05	N
Triethylamine	6.62E-01	1.20E+00	1.30E+03	7.70E+03	N
Phosphoric acid	6.30E-02	-	1.24E+02	2.70E+02	N
Propylene glycol monomethyl ether	1.55E+01	-	8.43E+03	2.70E+05	N
Methanol	8.60E-01	1.20E+01	4.68E+02	1.50E+05	N
Xylene	4.41E-01	9.70E+00	8.69E+02	2.70E+04	N
Ethylbenzene	1.32E-01	-	2.61E+02	3.30E+01	Y
Formaldehyde	4.47E-02	2.40E-02	8.90E+01	1.40E+01	Y
Toluene	9.18E-05	2.20E+00	3.44E-01	1.60E+04	N
Benzene	2.00E-05	1.20E-02	7.50E-02	2.90E+00	N

Note: Project emissions include TACs from coating operations and from the combustion of natural gas from the curing ovens.

Plant Cumulative Increase

The project located at 16100 Jacqueline Court, Morgan Hill, CA 95037 is an existing facility. S-1 is being modified as part of this application and S-5 and S-6 are new sources.

Table 15. Baseline Throughputs from S-1

Baseline	Stain Usage[1] (gallons)	Adhesive Usage (gallons)	Coating Usage (gallons)
May 2022-April 2023	130.00	0.00	2,763.00
May 2023-April 2024	130.00	0.00	1,774.80
May 2024-April 2025	130.00	0.00	3,107.80

1. *Baseline throughputs per recordkeeping spreadsheet.*
2. *The combined annual limit for stains is 130 gallons/year, adhesives is 595 gallons/year, and coatings is 4,005 gallons/year for S-1, S-2, and S-3.*
3. *Annual stain usages exceeded the combined permitted throughput limit.*

Table 16. Baseline POC Emissions for Coating Operations from S-1

Baseline	Stain POC Emissions[1] (lb/yr)	Adhesive POC Emissions (lb/yr)	Coating POC Emissions (lb/yr)	Total POC Emissions (lb/yr)	Total POC Emissions (tpy)
May 2022-April 2023	377.00	0.00	2,396.30	2,773.30	1.387
May 2023-April 2024	377.00	0.00	1,539.03	1,916.03	0.958
May 2024-April 2025	377.00	0.00	2,128.08	2,505.08	1.253
3-Year Average				**2,398.14**	**1.199**

1. *Stain emissions use the permitted VOC limit of 2.9 lb VOC/gal times the permitted throughput limit.*

Table 17. Baseline Emissions for Natural Gas Combustion from S-1

Pollutant	2023[1] (tons/yr)	2024[2] (tons/yr)	2025[3] (tons/yr)	Three Year Average (tons/yr)
NOx	0.049	0.046	0.047	0.047
POC	0.002	0.002	0.002	0.002
CO	0.012	0.012	0.012	0.012
PM_{10}	0.001	0.001	0.001	0.001
$PM_{2.5}$	0.001	0.001	0.001	0.001
SO_2	0.000	0.000	0.000	0.000

1. *Emissions from natural gas combustion per Renewal 327015*
2. *Emissions from natural gas combustion per Renewal 699472*
3. *Emissions from natural gas combustion per Renewal 723766*

Table 18. Total Baseline Emissions from S-1

Pollutant	Three Year Average (tons/yr)
NOx	0.047
POC	1.201
CO	0.012
PM_{10}	0.001

$PM_{2.5}$	0.001
SO_2	0.000

The table below summarizes the cumulative increase in criteria air pollutant emissions that will result from this application.

Table 19. Plant Cumulative Increase, Post 4/5/91

Pollutant	Existing Emissions Post 4/5/91[1] (tons/yr)	S-1 Emissions (tons/yr)	S-5 Emissions (tons/yr)	S-6 Emissions (tons/yr)	Cumulative Increase (tons/yr)
NOx	0.000	0.051	0.089	0.000	0.140
POC	7.236	2.777	3.029	1.006	14.048
CO	0.000	0.045	0.075	0.000	0.120
PM_{10}	0.000	0.790	0.586	0.231	1.607
$PM_{2.5}$	0.000	0.790	0.586	0.231	1.607
SO_2	0.000	0.000	0.001	0.000	0.001

1. *Existing emissions include 5.139 tpy for S-4 (AN 29068) and the pre-project emissions of 2.097 tpy for S-1 (AN 23375). S-2 and S-3 were replaced with S-5 and S-6 as part of this application.*

Statement of Compliance

The owner/operator is expected to comply with all applicable requirements. Key requirements are listed below:

District Rules

Regulation 1-301 – Public Nuisance

The facility is subject to and expected to be in compliance with the requirements of Regulation 1-301 (Public Nuisance).

Regulation 2, Rule 1 – Permits, General Requirements

California Environmental Quality Act (CEQA Compliance): This permit application is categorically exempt from CEQA because the project has no potential for causing a significant adverse environmental impact. The application is categorically exempt from CEQA under CEQA Guidelines Section 15301 ("No or Negligible Expansion of Existing Use"). In making the determination that this application is categorically exempt a formal health risk assessment was approved by the Air District.

Public Notification: The public notification requirements of Regulation 2-1-412 apply to applications which result in any increase in TAC or hazardous air contaminant emissions at facilities within, either 1,000 feet of the boundary of a K-12 school, or located in an Overburdened Community (OBC) and requires an HRA. The project is not within 1,000 feet of the nearest school, but it is located within an OBC. The project requires an HRA, therefore, the project is subject to the public notification requirements of Regulation 2-1-412. A public notice was prepared and distributed on XXXX.

Regulation 2, Rule 2 – Permits, New Source Review

Best Available Control Technology (BACT): Per Regulation 2, Rule 2, Section 301 BACT is required for new or modified sources with potential emissions of 10.0 pounds per day or more of POC, NPOC, NO_X, PM_{10}, $PM_{2.5}$, or SO_2. S-1, S-5 and S-6 emit more than 10 lbs/day of POC and NPOC, therefore S-1, S-5, and S-6 are subject to BACT requirements.

Table 20. BACT Triggers

Pollutant	S-1 BACT Triggered? (Yes/No)	S-5 BACT Triggered? (Yes/No)	S-6 BACT Triggered? (Yes/No)
NOx	No	No	No
POC	Yes	Yes	Yes
CO	No	No	No
$PM_{10}/PM_{2.5}$	No	No	No
SO_2	No	No	No
NPOC	Yes	Yes	Yes

Per Section 2-2-202, BACT is defined as an emission limitation, control device, or control technique applied at a source that is the most stringent of:

- the most effective device or technique successfully utilized,
- the most stringent emission limitation achieved by an emission control device or technique for the type of equipment comprising such a source,
- the most effective emission control limitation for the type of equipment comprising such a source that is contained in an approved implementation plan of any state, or
- the most effective control device or technique or most stringent emission limitation that is technologically feasible, taking into consideration cost-effectiveness, any ancillary health and environmental impacts, and energy requirements.

These requirements are generally categorized as either technologically feasible and cost-effective (termed "BACT 1") or achieved-in-practice (termed "BACT 2").

BACT (2) is either equal to or less stringent than BACT (1). Because achieved-in-practice is required regardless of cost and BACT (1) is more stringent than BACT (2), an evaluation for what has been achieved-in-practice is first conducted.

BACT for S-1, S-5 and S-6 is presented in the current BAAQMD BACT/TBACT Workbook for Spray Booth – Coating of Wood Products, Document #161.8.1, Revision 2, dated 09/13/2000. For NPOC and POC, BACT (2) has been determined to be using coatings with VOC content less than required by Regulation 8 Rule 32. Annual usage limits are tiered to require the use of lower VOC coatings, stains, and solvents. For operational flexibility purposes, the daily limits are not subject to the tiered limits but

instead use a worst-case calculation. The facility will be required to maintain daily recordkeeping to better track daily tiered usages. BACT (1) requires the use of coatings with VOC content less than required by Regulation 8 Rule 32, and emissions controlled to overall capture/destruction efficiency of ≥90% by weight. S-1, S-5, and S-6 are already meeting BACT(2) requirements by using coatings with VOC content less than what is required by Regulation 8-32.

Technologically Feasible and Cost-Effective
The following control technologies and mitigation measures have been found technically feasible for abating NPOC and POC emissions from coating operations[1]:

- Carbon adsorbers (achievable VOC reduction 95 percent).
- Incinerators and Oxidizers (achievable VOC reduction 99 percent).

For BACT (1), cost analysis using EPA's Air Pollution Control Cost Manual was performed for S-1. If S-1 is not cost-effective, since it is the largest spray booth we can assume S-5 and S-6 are also not cost-effective. The analysis shows that the estimated annual cost for a carbon adsorber at S-1 is approximately $56,051/ton of VOC controlled. The cost for a thermal oxidizer would be more than a carbon adsorber, therefore, only the carbon adsorber cost was calculated to show that BACT(1) is not cost-effective.

Table 21. Cost Effectiveness

Technology	POC/NPOC Destruction Efficiency	Quantity of POC Removed (tpy)	Annualized Cost	Cost ($/ton)
Carbon Adsorber (Acetone)	90%	4.37	$244,942	$56,051

Offsets: Air District Regulation 2-2-302 requires offsets for new or modified sources at a facility that has the potential to emit (PTE)10 tpy or more of POC and NOx. Air District Regulation 2-2-303 requires offsets for new or modified sources at a facility that has the PTE 100 tpy or more of $PM_{2.5}$, PM_{10}, and SO_2. As seen in the table below, POC exceeds 10 tpy, therefore, offsets are required.

Table 22. Facility-Wide PTE for Offsets

Pollutant	S-4 Emissions[1] (tons/yr)	S-1 Emissions (tons/yr)	S-5 Emissions (tons/yr)	S-6 Emissions (tons/yr)	Facility PTE (tons/yr)
NOx	0.000	0.369	0.089	0.000	0.458
POC	5.139	4.874	3.029	1.006	14.048
CO	0.000	0.310	0.075	0.000	0.385
PM_{10}	0.000	0.814	0.007	0.231	1.052
$PM_{2.5}$	0.000	0.028	0.007	0.231	0.266
SO_2	0.000	0.002	0.001	0.000	0.003

1. *POC emissions from S-4 are from Application #29068.*

[1] United States Environmental Protection Agency. Cost Reports and Guidance for Air Pollution Regulations, Carbon Adsorbers and Incinerators and Oxidizers.

The POC PTE is more than 10 tpy but less than 35 tpy, therefore the offsets can be provided at a 1:1 ratio from the Small Facilities Banking Account (SFBA). The facility's permitted emissions are shown in Table 22. Thus, 14.048 tpy of POC offsets will be provided from SFBA.

Prevention of Significant Deterioration (PSD): This facility will not have the PTE more than 100 tpy of any criteria pollutant, therefore this facility is not a "Major Facility" as defined in the Air District Regulation 2-2-217 and is not subject to PSD permitting requirements under Regulation 2-2-304.

Regulation 2, Rule 5 – Toxic Risk Assessment
Rule 2-5 applies to new or modified sources of TACs for which an application is submitted on or after July 1, 2005. All TAC emissions from new and modified sources are subject to risk assessment if emissions of any individual TAC exceed the trigger thresholds specified in Table 2-5-1 of Rule 2-5. Pursuant to Regulation 2-5-110, a project shall not be subject to this rule if, for each TAC, the total project emissions are below the acute and chronic trigger levels listed in Table 2-5-1 of this regulation.

As presented in Table 14, lead, EGBE, ethylbenzene and formaldehyde emissions exceed either the acute and/or chronic trigger levels. Therefore, an HRA is required.

The Air District's Risk Assessment and Reduction Team conducted a HRA on 11/06/25 and the results showed that the maximum cancer risk is 1.02 in a million, the acute hazard index is 0.89 and the chronic hazard index is 0.07. Thus, the project meets the project risk limits of Regulation 2-5-302.

Regulation 6, Rule 1 – Toxic Risk Assessment
Ringelmann No. 1 Limitation: Section 301 states a person shall not emit from any source for a period or aggregate periods of more than 3 minutes in any hour, a visible emission that is as dark or darker than No. 1 on the Ringelmann Chart, or equivalent opacity. The facility is expected to comply with this standard.

Visible Particles: Section 305 prohibits emissions of visible particles from the operator's property causing a nuisance on another property. The facility is expected to comply with this standard.

Total Suspended Particulate (TSP) Concentration Limits: Section 310.1 limits TSP from any source in excess of 343 mg per dscm (0.15 gr/dscf) of exhaust gas volume. S-1, S-5, and S-6 are expected to comply with the 0.15 gr/dscf limit as PM emissions are very low.

TSP Weight Limits: Section 311 limits TSP emission rate based on the source's process weight rate. According to Table 6-1-311.1, the applicable TSP emission limit for S-1 is 1.78 lb/hr (0.81 kg/hr) because the spray booth processes less than 551 lbs of coatings per hour. The maximum hourly PM emissions for S-1 is 1.26 lb/hr. S-1 is the largest spray

booth, therefore if S-1 complies with the PM emission limit the smaller booth are expected to comply as well.

Section 310.2 and 311.2 are applicable to sources with TSP greater than 1,000 kg/yr. Neither section is applicable because source S-1's TSP PTE is below 1,000 kg/yr.

Regulation 8, Rule 4– General Solvent and Surface Coating Operations
Per Exemption 8-4-113, this rule does not apply to operations that are subject to the requirements of other Rules of this Regulation 8. S-1, S-5, and S-6 are subject to Regulation 8-32 for wood products coatings; therefore, S-1, S-5, and S-6 meet this exemption.

Regulation 8, Rule 32 – Wood Products Coatings
S-1, S-5 and S-6 are subject to BAAQMD Regulation 8, Rule 32, for wood products coatings.

Spray Application Equipment Limitations: Per Section 301, if a facility utilizes spray application equipment to apply coatings to wood products, the facility must use one or more of the following application methods:

- Airless spray
- Air assisted air spray
- High volume low pressure (HVLP) spray
- Electrostatic air spray
- Detailing or touch-up guns

S-1, S-5, and S-6 utilize HVLP spray guns.

Wood Furniture, Custom Cabinetry and Custom Architectural Millwork Limits: Per Section 303, no person shall apply to any wood furniture, custom cabinetry or custom architectural millwork, any coating with a VOC content in excess of the limits in the table below, unless emissions to the atmosphere are controlled to an equivalent level by air pollution abatement equipment with an abatement device efficiency of at least 85% that meets the requirements of Regulation 2, Rule 1

Coating	Wood Furniture, Custom Cabinetry and Architectural Work – VOC Limit (lbs/gal)
Clear Sealer	2.3
Clear Topcoat	2.3
Single Application Varnish	4.6
Sanding Sealer	2.3
Pigmented Coating	2.3
Pigmented Primer, Sealer, and Undercoat	2.3

Pigmented Topcoat	2.3
Multi-colored Coating	2.3
High Solids Stain	2.9
Filler	2.3
Low Solids Stain	1.0
Low Solids Toner and Wash-coat	1.0

S-1, S-5, and S-6 will comply with the VOC content limits as enforceable permit conditions.

Solvent Evaporative Loss Minimization: Per Regulation 8-32-320, unless emissions are abated by a control system with at least 85% abatement efficiency, any person using organic solvent for surface preparation and/or cleanup in connection with coating of wood products, and any person mixing, using or disposing of coating, adhesive or stripper containing organic solvent in connection with coating of wood products shall comply with the following requirements:

- Use closed containers for the storage or disposal of cloth or paper used for solvent surface preparation and cleanup.
- Store fresh or spent solvent in closed containers.
- Do not use organic compounds for the cleanup of mixing or storage equipment unless equipment for collecting the cleaning compounds and minimizing their evaporation to the atmosphere is used
- Do not use organic solvent for the cleanup of spray equipment, including coating lines, with a VOC content in excess of 50 g/l (0.42 lb/gal) unless either,
    i. solvent is pressurized though spray equipment with atomizing air off or dispensed from a small non-atomizing container, and collected and stored in a closed container until recycled or properly disposed of offsite, or
    ii. A spray gun washer subject to and in compliance with the requirements of Regulation 8, Rule 16 is used.
- Do not leave containers of stripper, coating, adhesive, catalyst, solvent or thinner open to the atmosphere when not in use

S-1, S-5, and S-6 are expected to comply with the solvent evaporative loss minimization requirements.

Surface Preparation Standards: Per Regulation 8-32-321, no person shall use a solvent with a VOC content that exceeds 25 g/l (0.21 lbs/gal), as applied, for surface preparation in any operation subject to this Rule unless emissions to the atmosphere are controlled to an equivalent level by an approved emission control system with an overall abatement efficient of at least 85 %. The facility does not use solvents for surface preparation, therefore, they are not subject to the requirements of this regulation.

Recordkeeping Requirements: Any person subject to Section 8-32-303, shall:

1. Maintain a current list of coatings in use which provides all of the data necessary to evaluate compliance, including the following information, as applicable:
    a. coating, catalyst, reducer, or other thinner or solvent used
    b. manufacturer's recommended ratio of components
    c. VOC content of coating as applied after any thinning
    d. solids content of each high solids coating as applied after any thinning
    e. thinner or solvent used for cleaning or surface preparation
2. Record the following information on a daily basis, as applicable:
    a. coating and mix ratio of components in the coating used
    b. quantity of each coating applied
    c. identification of coating category
    d. type and amount of solvent used for cleanup and surface preparation
    e. emissions averaging calculations if using the alternate compliance option provided in 8-32-307.
3. Record air pollution abatement equipment key operating parameters on a daily basis where such equipment is installed to meet the requirements of Sections 8-32- 302, 303, and 304.
4. Retain the records required by sections 501.2 and 501.3 for a period of 24 months and make them available for inspection by the APCO upon request.

Regulation 8, Rule 51 – Adhesive and Sealant Products

The purpose of this Rule is to limit the emissions of organic compounds from adhesive and sealant products. S-1, S-5, and S-6 will not use adhesive. Therefore, S-1, S-5 and S-6 will no longer be subject to the requirements of this rule.

California Environmental Quality Act (CEQA)

This permit application is categorically exempt from the California Environmental Quality Act (CEQA). CEQA Guidelines, Section 15301 exempts projects that involve negligible or no expansion of use. This includes additions to existing structures provided that the addition will not result in an increase of more than 50 percent of the floor area of the structures before the addition, or 2,500 square feet, whichever is less, as listed in Section 15301(e)(1). Per the applicant, the proposed project will not add any floorspace to the facility's existing building structure. Because the footprint of the facility is not changing, the project is considered to result in no increase or only a negligible increase in use of the facility. Further, based on the review of the permit application materials, including Appendix H, environmental information form, the project will not have any significant environmental impacts, and cumulative impacts from successive projects of the same type in the same place will not result in significant environmental impacts.

New Source Performance Standards (NSPS)

S-1, S-5, and S-6 are not subject to any NSPS requirements.

National Emissions Standards for Hazardous Air Pollutants (NESHAP)

NESHAP Subpart QQQQ applies to facilities that are major sources of hazardous air pollutants (HAPs) and that perform surface coating of wood building products. "Wood

building products" are defined as wood or wood-composite substrates that are coated for use in the construction of residential, commercial, or institutional buildings. The facility is not a major source of HAPs; therefore not subject to the requirements of Subpart QQQQ.

Permit Conditions

Permit Condition # 24378

Mission Bell Mfg. Inc.; Plant #19692
Application # 728531
PERMIT CONDITIONS for
S-1, Spray Booth, Golden West, DSD 3040PDT
~~S-2, Spray Booth, Golden West, DB 148~~
~~S-3, Spray Booth, M&M 1122~~
S-5, Spray Booth, PFS-SDD-27/M1
S-6, Spray Booth, PFS-OFSB-18

1. The owner/operator of S-1 shall ensure that the following stain, coating, and/or solvent usage limits and corresponding VOC limits are not exceeded for S-1 in any consecutive twelve-month period:
   High VOC Stain - 225 gal/year @ ≤1.00 lb VOC/gal
   Low VOC Stain - 675 gal/year @ ≤0.63 lb VOC/gal
   High VOC Coatings – 850 gal/year @ ≤2.25 lb VOC/gal
   Medium VOC Coatings - 850 gal/year @ <1.55 and >0.51 lb VOC/gal
   Low VOC Coatings – 1,700 gal/year @ ≤0.51 lb VOC/gal
   Solvent - 750 gal/year @ ≤6.61 lb NPOC/gal
   (Basis: Cumulative Increase, Regulation 8-32-303, BACT)

2. The owner/operator of S-1 shall ensure that the following stain, coating, and/or cleanup solvent usage limits and corresponding VOC limits are not exceeded for S-1 in any calendar day:
   Stain – 6.00 gal/day @ 1.00 lb VOC/gal
   Coatings – 15.00 gal/day @ 2.25 lb VOC/gal
   Cleanup solvent – 3.00 gal/day @ 6.61 lb NPOC/gal
   (Basis: Cumulative Increase, BACT, Regulation 8-32-303)

3. The owner/operator of S-5 shall ensure that the following stain, coating, and/or solvent usage limits and corresponding VOC limits are not exceeded for S-5 in any consecutive twelve-month period:
   High VOC Stain - 225 gal/year @ ≤1.00 lb VOC/gal
   Low VOC Stain - 525 gal/year @ ≤0.63 lb VOC/gal
   High VOC Coatings – 625 gal/year @ ≤2.25 lb VOC/gal
   Medium VOC Coatings - 625 gal/year @ <1.55 and >0.51 lb VOC/gal
   Low VOC Coatings – 1,250 gal/year @ ≤0.51 lb VOC/gal
   Solvent - 375 gal/year @ ≤6.61 lb NPOC/gal
   (Basis: Cumulative Increase, Regulation 8-32-303, BACT)

4. The owner/operator of S-5 shall ensure that the following stain, coating, and/or solvent usage limits and corresponding VOC limits are not exceeded for S-5 in any calendar day:
   Stain – 3.00 gal/day @ 1.00 lb VOC/gal
   Coatings – 11.0 gal/day @ 2.25 lb VOC/gal
   Cleanup solvent – 2.00 gal/day @ 6.61 lb NPOC/gal
   (Basis: Cumulative Increase, BACT, Regulation 8-32-303)

5. The owner/operator of S-6 shall ensure that the following stain, coating, and/or cleanup solvent usage limits and corresponding VOC limits are not exceeded for S-6 in any consecutive twelve-month period:
   High VOC Stain - 50 gal/year @ ≤1.00 lb VOC/gal
   Low VOC Stain - 150 gal/year @ ≤0.63 lb VOC/gal
   High VOC Coatings – 250 gal/year @ ≤2.25 lb VOC/gal
   Medium VOC Coatings - 250 gal/year @ <1.55 and >0.51 lb VOC/gal
   Low VOC Coatings – 500 gal/year @ ≤0.51 lb VOC/gal
   Solvent - 100 gal/year @ ≤6.61 lb NPOC/gal

6. The owner/operator of S-6 shall ensure that the following stain, coating, and/or cleanup solvent usage limits and corresponding VOC limits are not exceeded for S-6 in any calendar day:
   Stain – 1.00 gal/day @ 1.00 lb VOC/gal
   Coatings – 4.00 gal/day @ 2.25 lb VOC/gal (Average)
   Cleanup solvent – 1.00 gal/day @ 6.61 lb NPOC/gal
   (Basis: Cumulative Increase, Regulation 8-32-303, BACT)

7. The owner/operator of S-1 may use stains, coatings, and/or solvents in quantities in excess of those specified in Parts 1 and 2 provided that the owner/operator can demonstrate that all of the following are satisfied:
   a. Precursor organic compound (POC) and non- precursor organic compound (NPOC) emissions from S-1 do not exceed the following emissions in tons in any consecutive 12-month period at each VOC tier:
      i. High VOC Stains (>0.63 and ≤1.0 lb/gal): 0.113 tpy POC and 0.003 tpy NPOC
      ii. Low VOC Stains (≤0.63 lb/gal): 0.213 tpy POC and 0.008 tpy NPOC
      iii. High VOC Coatings (>1.55 and ≤2.25 lb/gal): 0.956 tpy POC and 0.752 tpy NPOC
      iv. Medium VOC Coatings (>0.51 and ≤1.55 lb/gal): 0.660 tpy POC and 0.038 tpy NPOC
      v. Low VOC Coatings (≤0.51 lb/gal): 0.434 tpy POC and 0.323 tpy NPOC
      vi. Solvents: 2.479 tpy POC and 2.471 tpy NPOC
   b. POC and NPOC emissions from S-1 do not exceed the following emissions in pounds (lb) in any calendar day at each product group:
      i. Stains: 6.0 lb/day POC and 0.15 lb/day NPOC

ii. Coatings: 34 lb/day POC and 27 lb/day NPOC
iii. Solvents: 20 lb/day POC and 20 lb/day NPOC

c. The use of these materials does not result in the following toxic air contaminants exceeding the respective emission limits:
i. Lead – 3.47E-01 lb/year
ii. Ethylene Glycol Butyl Ether (EGBE) – 1.01E+0 lb/hour and 1.71E+03 lb/year
iii. Ethylbenzene – 1.29E+02 lb/year
iv. Formaldehyde – 2.56E-02 lb/hour and 4.45E+01 lb/year

In addition, the owner/operator of S-1 shall ensure that if alternate coatings and solvent are used, emissions of any new toxic air contaminants not listed above do not equal or exceed any acute and chronic trigger levels in Table 2-5-1 of Regulation 2-5 other than the four TACs mentioned above.
(Basis: Cumulative Increase, Regulation 2, Rule 5)

8. The owner/operator of S-5 may use stains, coatings, and/or solvents in quantities in excess of those specified in Parts 3 and 4 provided that the owner/operator can demonstrate that all of the following are satisfied:
a. POC and NPOC emissions from S-5 do not exceed the following emissions in tons in any consecutive 12-month period at each VOC tier:
i. High VOC Stains (>0.63 and ≤1.0 lb/gal): 0.113 tpy POC and 0.003 tpy NPOC
ii. Low VOC Stains (≤0.63 lb/gal): 0.165 tpy POC and 0.007 tpy NPOC
iii. High VOC Coatings (>1.55 and ≤2.25 lb/gal): 0.703 tpy POC and 0.553 tpy NPOC
iv. Medium VOC Coatings (>0.51 and ≤1.55 lb/gal): 0.485 tpy POC and 0.028 tpy NPOC
v. Low VOC Coatings (≤0.51 lb/gal): 0.319 tpy POC and 0.238 tpy NPOC
vi. Solvents: 1.239 tpy POC and 1.236 tpy NPOC

b. POC and NPOC emissions from S-1 do not exceed the following emissions in pounds (lb) in any calendar day at each product group:
i. Stains: 3.0 lb/day POC and 0.08 lb/day NPOC
ii. Coatings: 25 lb/day POC and 20 lb/day NPOC
iii. Solvents: 13 lb/day POC and 13 lb/day NPOC

c. The use of these materials does not result in the following toxic air contaminants exceeding the respective emission limits:
i. Lead – 2.53E-01 lb/year
ii. EGBE – 5.04E-01 lb/hour and 1.26E+03 lb/year
iii. Ethylbenzene – 9.45E+01 lb/year
iv. Formaldehyde – 1.27E-02 lb/hour and 3.19E+01 lb/year

In addition, the owner/operator of S-5 shall ensure that if alternate coatings and solvent are used, emissions of any new toxic air contaminants not listed above do not equal or exceed any acute and chronic trigger levels in Table 2-5-1 of Regulation 2-5 other than the four TACs mentioned above.

(Basis: Cumulative Increase, Regulation 2, Rule 5)

9. The owner/operator of S-6 may use stains, coatings, and/or solvents in quantities in excess of those specified in Parts 5 and 6 provided that the owner/operator can demonstrate that all of the following are satisfied:
    a. POC and NPOC emissions from S-6 do not exceed the following emissions in tons in any consecutive 12-month period at each VOC tier:
        i. High VOC Stains (>0.63 and ≤1.0 lb/gal): 0.025 tpy POC and 0.001 tpy NPOC
        ii. Low VOC Stains (≤0.63 lb/gal): 0.047 tpy POC and 0.002 tpy NPOC
        iii. High VOC Coatings (>1.55 and ≤2.25 lb/gal): 0.281 tpy POC and 0.221 tpy NPOC
        iv. Medium VOC Coatings (>0.51 and ≤1.55 lb/gal): 0.194 tpy POC and 0.011 tpy NPOC
        v. Low VOC Coatings (≤0.51 lb/gal): 0.128 tpy POC and 0.095 tpy NPOC
        vi. Solvents: 0.331 tpy POC and 0.330 tpy NPOC
    b. POC and NPOC emissions from S-6 do not exceed the following emissions in pounds (lb) in any calendar day at each product group:
        i. Stains: 1.0 lb/day POC and 0.03 lb/day NPOC
        ii. Coatings: 9.0 lb/day POC and 7.0 lb/day NPOC
        iii. Solvents: 7.0 lb/day POC and 7.0 lb/day NPOC
    c. The use of these materials does not result in the following toxic air contaminants exceeding the respective emission limits:
        i. Lead – 1.01E-01 lb/year
        ii. EGBE – 2.52E-01 lb/hour and 5.04E+02 lb/year
        iii. Ethylbenzene – 3.78E+01 lb/year
        iv. Formaldehyde – 6.30E-03 lb/hour and 1.26E+01 lb/year

    In addition, the owner/operator of S-6 shall ensure that if alternate coatings and solvent are used, emissions of any new toxic air contaminants not listed above do not equal or exceed any acute and chronic trigger levels in Table 2-5-1 of Regulation 2-5 other than the four TACs mentioned above.
    (Basis: Cumulative Increase, Regulation 2, Rule 5)

10. The owner/operator of S-1, S-5, and/or S-6 shall ensure that closed containers are used for the storage or disposal of fresh or spent solvent and any other VOC-containing compounds or cloth or paper impregnated with VOC compounds. Organic compounds may not be used for the cleanup of mixing, storage or spray equipment unless equipment for collecting the cleaning compounds and minimizing their evaporation to the atmosphere is used.
    (Basis: Regulation 8-32-320)

11. In order to demonstrate compliance with the above conditions, the owner/operator of S-1, S-5, and S-6 shall maintain the following records in an Air District approved log, including the following information:

a. Current list of coatings, stains, and solvents including:
    i. Identification of each product by manufacturer and product name;
    ii. Material Safety Data Sheets of all coatings, stains and solvents;
    iii. VOC content as supplied;
    iv. Mix ratio of components in the product used, and final VOC content;
    v. NPOC content;
    vi. Solids content;
    vii. Identification of regulatory limit categories (i.e., clear topcoat, pigmented primer, low solids stain etc.),
b. Quantities of each type of coating, stain, and/or solvent and corresponding VOC (in #/gal) used at S-1, S-5, and/or S-6 on a daily basis.
c. The daily quantities of all stains, coatings , and solvents at each of S-1, S-5 and/or S-6 shall be totaled each day to calculate the daily usages and the corresponding VOC at each of the spray booths. Monthly summaries shall be prepared by adding the daily data.
d. Calculate lead, EGBE, ethylbenzene, and formaldehyde mass emissions based on MSDS maximum weight percents on an hourly and an annual basis.

All records shall be retained on-site for 24 months from the date of entry and made available for inspection by Air District staff upon request.
(Basis: Cumulative Increase, Regulation 8-32-501)

End of Conditions

Recommendation

The Air District has reviewed the material contained in the permit application for the proposed project and has made a preliminary determination that the project is expected to comply with all applicable requirements of Air District, state, and federal air quality-related regulations. The preliminary recommendation is to issue an Authority to Construct for the equipment listed below. However, the proposed sources will be located within an OBC and required an HRA which triggers the public notification requirements of Air District Regulation 2-1-412. After the comments are received and reviewed, the Air District will make a final determination on the permit.

I recommend that the Air District initiate a public notice and consider any comments received prior to taking final action on the following:

S-5 Spray Booth, Make/Model: PFS-SDD-27/M1, Flow rate: 16,262 cubic feet per minute (CFM), Natural Gas Heater, M1, 0.5 MMBtu/hr

S-6 Spray Booth, Make/Model: PFS-OFSB-18, Flow rate: 14,400 CFM

Additionally, the facility applied for a modification for the following source:

S-1 Spray Booth, Golden West, DSD 3040PDT, 34,100 CFM, Natural Gas Heater, 2.07 MMBtu/hr

Prepared By: Emily Schwartz, Air Quality Engineer I 11/24/2025

Appendix A – Paint List