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

PETITIONER: IPS Corporation

CASE NO: 6269-01
FACILITY ID: 800367

FACILITY ADDRESS: 17109 S. Main Street
City, State, Zip: Gardena, California 90248

1. TYPE OF VARIANCE REQUESTED

☐ INTERIM ☒ SHORT ☐ REGULAR ☐ EMERGENCY ☐ *EX PARTE* EMERGENCY

IPS Corporation ("Petitioner" or "IPS") respectfully submits to the District Hearing Board this Petition for a Short Variance from District Rules 203 and 3002(c)(1) to allow Petitioner to repair and re-test an emission control device while it remains in operation to control emissions of volatile organic compounds ("VOCs") from fill line, mixing, and storage operations at the Main Street facility located at 17109 S. Main Street in Gardena, California. The facility packages and distributes low-VOC and ultra-low VOC Weld-On® solvent cements and other products for customers nation-wide. In about 2009, Weld-On became one of the first in the industry to offer environmentally responsible low-VOC solvent cements, primers, and cleaners, effectively reducing VOC emissions each time the products are used.

The October 22, 2021 Facility Permit ("Permit") for the Main Street Facility requires a 99 percent control efficiency for VOCs, but a source test reflects a 98.6 percent control efficiency.[1] Petitioner seeks this variance to allow the facility to operate using the emission control equipment with its current control efficiency until repairs are completed and a new source test conducted or until the District accepts the existing October 1, 2024 source test as a demonstration of compliance.

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).

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IPS Corporation
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[1] The Permit imposes a 98% VOC control efficiency for IPS's other emission control device, Device No. G10601; therefore, the device at issue in this petition is the more robust of the two devices.

Email vheger@duanemorris.com

Email anthony.lovallo@ipscorp.com

3. RECLAIM Permit ☐ Yes ☒ No Title V Permit ☒ Yes ☐ No

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)

Not applicable.

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

IPS Corporation is a leader in manufacturing solvent cements and numerous components and supplies for the plumbing, construction, and plastic fabrication industries and has been for more than 60 years. Weld-On Adhesives, Inc., a subsidiary of IPS Corporation, was the originator the solvent cement technology, helping to formulate ASTM standards and testing for polyvinyl chloride ("PVC"), chlorinated PVC ("CPVC"), acrylonitrile butadiene styrene ("ABS") and other plastic piping systems. Weld-On products are globally recognized as the premium products for joining plastic pipes and fittings.

In 2019, Weld-On introduced the ECO™ Series of ultra-low VOC solvent cements and primers for irrigation, industrial, pool and spa applications. In 2021, the Weld-On and Christy's solvent cements, primers and cleaning products have received UL GREENGUARD GOLD Certification. Products that have achieved GREENGUARD GOLD Certification have been tested and certified to meet some of the world's most rigorous, third-party chemical emissions to create improved indoor environments.

The use of IPS products have effectively lowered VOC emissions to levels that cannot be adequately quantified, effectively meeting or exceeding the VOC limits set forth in SCAQMD Rule 1168 (Adhesives and Sealants) and Rule 1171 (Solvent Cleaning).

The Main Street facility packages and distributes low-VOC and ultra-low VOC solvent cement and other products to customers nationwide and abroad.

6. List the equipment and/or activity(s) that are the subject of this petition.

Relevant Excerpts from the 2019 version of the Facility Permit are attached hereto as **Exhibit A**. The 2021 Permit is the same.

PPC Equipment/Activity	Application/ Permit No.	Device Nos.	Date Application/Plan Denied (if relevant)

Regenerative Thermal Oxidizer ("RTO") No. G10605	N/A	G10605	N/A
Fill Line Nos. 3, 21, 22, and 23	N/A	M42127, G6402, G6404, G10603	N/A
Mixers MM-1 through MM-12	N/A	G6381, G12140, G12139, G12138, G6384, G6385, G12137, G6387, G6388, G6390, G6391, G6392	N/A
Holding Tanks H-1 through H-5	N/A	G12141, F97834, F98735, F98736, F98737	N/A

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 equipment that is subject to this petition consists of RTO No. G10605 and the equipment connected to it. The RTO captures and controls VOCs associated with the entire Main Street Facility, namely Fill Lines Nos. 3, 21, 22, and 23 ("File Lines"), Mixers MM-1 through MM-12 ("Mixers"), and Holding Tanks H-1 through H-5 ("Holding Tanks").

The RTO was installed in 2009 with a performance guarantee from the manufacturer that stated:

> "If all Performance Conditions are satisfied, the Equipment will reduce the concentration of hydrocarbons measured at the discharge stack of the Equipment as compared to the concentrations of hydrocarbons measured at the inlet of Equipment by an average of 99% or down to 25 ppm as C_1 in the stack."

(See **Exhibit B**.)

The manufacturer mandated as a performance condition that RTO No. G10605 be operated at 1,500 degrees Fahrenheit, which it has been.

RTO No. G10605 continues to control emissions at the Main Street Facility. Without RTO No. G10605 in operation, the entire facility would be required to shut down.

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

If yes, how often: Yes

Date of last maintenance and/or inspection: Jan. 20, 2025

Describe the maintenance and/or inspection that was performed.

RTO No. G10605 is required to be inspected annually. The last inspection report issued on January 29, 2025 recommended that IPS replace the ceramic media bed for the RTO. IPS immediately began seeking vendor quotes for the ceramic media, with the goal of completing the work before the next annual inspection in 2026.

IPS has maintained RTO No. G10605 in accordance with manufacturer specifications and measured and recorded temperature to ensure combustion temperature of 1,500 degrees Fahrenheit.

9. List all District rules, and/or permit conditions from which you are seeking variance relief. Briefly explain how you are or will be in violation of each rule or condition.

Rule	Explanation
Rules 203(b) and 3002(c)(1)	These rules require that a facility permit holder comply with the permit conditions listed below.
Condition No. 6	Condition 6 in the Facility Permit for RTO No. G10605 requires: "This equipment shall be maintained and operated at a minimum destruction efficiency of 99% and an overall VOC control efficiency (collection and destruction) of 99% when the basic equipment it serves is in operation." An October 1, 2024 source test for RTO No. G10605 shows a control efficiency of 98.6%, which when rounded up equates to 99%. On February 13 and again on February 20, 2025, IPS discovered that the South Coast AQMD does not consider a source test showing 98.6% control efficiency to satisfy the 99% control efficiency requirements in the Facility Permit. In contrast, U.S. EPA does round performance test results up, according to June 8,1990 Performance Test Calculation Guidelines, as explained in paragraph 14, below. Until the District accepts a compliant source test, Petitioner is not able to comply with this condition. Applicable to Device No. G10605
Conditions No. 3 for Fill Lines and Mixers Condition No. 4 for Holding Tanks	Condition No. 3 for the Fill Lines and Mixers prohibits the operation of the equipment unless it is vented to air pollution control which is in full use. Condition No. 4 for the Holding Tanks includes the same prohibition. While RTO No. G10605 is in full use, the District has not accepted the October 1, 2024 source test as a demonstration of compliance; therefore, Petitioner is not able to satisfy the "full use" provisions at this time. Applicable to Fill Lines (Device Nos. M42127, G6402, G6404, G10603) Applicable to Mixers (G6381, G12140, G12139, G12138, G6384, G6385, G12137, G6387, G6388, G6390, G6391, G6392) Applicable to Holding Tanks (Device Nos. G12141, F97834, F98735, F98736, F98737)

Administrative Conditions E.3, E.4 and E.7	The first sentence of Administrative Condition E.3 provides that Petitioner's permit "does not authorize the emissions of contaminants in excess of those allowed by Division 26 of the Health and Safety Code of California or the Rules and Regulations of the AQMD." Condition E.4 in the Permit prohibits the use of equipment unless it is connected to air pollution control in full use. The first sentence of Administrative Condition E.7 provides that the facilities "shall maintain and operate all equipment to ensure compliance with all emission limits as specified in this facility permit." Petitioner requires relief from these conditions for the same reasons as those stated above for the equipment-specific conditions. Applicable to Fill Lines (Device Nos. M42127, G6402, G6404, G10603) Applicable to Mixers (G6381, G12140, G12139, G12138, G6384, G6385, G12137, G6387, G6388, G6390, G6391, G6392) Applicable to Holding Tanks (Device Nos. G12141, F97834, F98735, F98736, F98737)

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
			Not Applicable.

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
			Not Applicable.

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.

Petitioner has received one NOV concerning RTO No. G10605 in the past year. (See **Exhibit C**.) The NOV alleges that RTO No. G10605 is not meeting the VOC 99% destruction efficiency, which IPS is preparing to cure. The NOV also alleges a failure to report, which IPS has cured, and a temporary lapse in monitoring at RTO No. G10601, which IPS has also cured.

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

Not Applicable.

14. Explain why it is beyond your reasonable control to comply with the rule(s) and/or permit condition(s):

The following facts demonstrate that conditions beyond Petitioner's reasonable control prevent Petitioner from complying with the provisions of the District Rules listed in Paragraph 9, above, until such time that the District accepts a compliant source test or RTO No. G10605 is re-tested successfully following replacement of the ceramic media.

- On August 20, 2024, an IPS source test contractor performed a source test for nitrogen oxides ("NOx") and carbon monoxide ("CO") to determine compliance with District Rule 1147. However, during the test, the source test contractor also tested for VOCs. Neither the Facility Permit nor any District rule requires source testing RTO No. G10605 for VOCs.
- On October 1, 2024, IPS received results of the source test, showing that RTO No. G10605 operated with 98.6% control efficiency for VOCs. The source test contractor did not alert IPS to any issue of non-compliance and advised that IPS passed the source test. Notably, U.S. EPA Performance Test Calculation Guidelines (attached as **Exhibit D**) typically evaluate compliance with rule and permit limits by rounding results, then comparing the results to the limit. The EPA Performance Test Calculation Guidelines set forth procedures to explain how to round "significant figures (SF's)" up or down to determine compliance with applicable emission standards. Section 2 of the policy states: "Consider all emission standards to have at least two SF's, but no more than three SF's." This policy adopted a rounding method so that a result of "0.401" would not be considered to violate an emission standard of "0.40." U.S. EPA clearly explained: "***if the emission standard is 90, then 90.357 would be rounded to 90, 90.639 would be rounded to 91, 90.500 would be rounded to 90, and 91.500 would be rounded to 92***." (Exh. D, emphasis added.) Thus, on October 1, 2024, IPS believed that a source test showing 98.6% control efficiency fully satisfied the 99% control efficiency set forth in Condition 6 of its Facility Permit.
- On October 10, 2024, IPS provided the source test results to the District.
- More than four months later, on February 13, 2025, District Inspector Arely Gil Rojas inspected the IPS Main Street Facility and informed the facility that a source test result of 98.6% was not deemed compliant with the 99% control efficiency stated in Condition No. 6 for RTO No. G10605. NOV No. 64622 followed.
- On February 20, 2025, IPS and its air quality consultant contacted the District to discuss the NOV and the EPA policy to evaluate compliance with rule and permit limits by rounding results then comparing the results to the limit. During that conversation, IPS learned that when a source test is involved, the District would not round 98.6% up to 99% despite that the U.S. EPA policy would do so when evaluating compliance.

- On February 26, 2025, IPS reported the source test result as an excess-emissions-related deviation in its Semi-annual Monitoring Report. The Form 500-N portion of the report explained that the RTO's performance levels at 98.6% were not due to operator error, neglect, or improper operation or maintenance because although the "[s]ource test was below limit, [the]. . .equipment was maintained per manuf. instructions."

As reflected above, from October 1, 2024 until approximately February 20, 2025, Petitioner believed based on all available evidence that the emission control provided by RTO No. G10605 was in compliance with applicable Facility Permit provisions. This petition is filed in response to the February 20, 2025 discovery that the District deems operations of RTO No. G10605 non-compliant. This determination has the ripple effect on the compliance status of the Fill Lines, Mixers, and Holding Tanks connected to RTO No. G10605.

To resolve the control efficiency status of RTO No. G10605, IPS has been expediting the repairs and replacements recommended in the January 29, 2025 annual inspection report for RTO No. G10605. The report recommended that IPS replace the ceramic media for the RTO, which IPS planned to do prior to January 2026. IPS now is expediting the replacement and retesting. This requires two separate maintenance contractors, one with a contractor who will use equipment to safely remove the existing ceramic media in place for the RTO and a second contractor who will provide the new ceramic media, which IPS will install. The work cannot be conducted until RTO No. G10605 is properly shut down and its normal operating temperature of 1,500 degrees Fahrenheit is lowered in a safe manner. IPS anticipates that the repairs will be conducted by the end of March 2025 or early April 2025. IPS has contracted with a source test provider to re-test RTO No. G10605 after the ceramic media has been replaced. Approximately two weeks' time is required for the source test results; therefore, Petitioner seeks this variance for 30 days, with the expectation that satisfactory source testing is obtained within this time frame.

To mitigate emissions associated with RTO No. G10605 Petitioner will continue to maintain and operate RTO No. G10605 at its operating temperature of 1,500° F. Petitioner has no other feasible means to comply with the Facility Permit. Petitioner's only other option would be to shut down the entire Main Street Facility, which would amount to a taking of a lawful business as explained in paragraphs 17 and 18, below. Petitioner has no reasonable means to shut down the entire Main Street Facility in order to allow time for repairing and re-testing RTO No. G10605. Even if Petitioner had a means to curtail 100% of its Main Street Facility operations, it would require the shut down and restarting of the Fill Lines, Mixers, and Holding Tanks, thereby causing a risk of potential emissions during shut downs and start-ups.

Petitioner has been diligent since discovering on February 20, 2025 that the District plans to treat the October 1, 2024 source test as evidence of permit non-compliance. A variance is the only reasonable means to complete repairs while equipment remains in operation.

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)?

See paragraph 14.

16. What actions have you taken since that time to achieve compliance:

See paragraph 14.

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

Denial of the variance would result in harm to Petitioner. To comply with rules specified in paragraph 9, above, Petitioner would be required to shut down the entire Main Street Facility. The shut down and restarting of various types of equipment causes of the risk of increased emissions and would constitute closing (and taking) of a lawful business without corresponding benefit to reducing air contaminants. Such a closing and taking would reduce supply of ultra-low VOC solvent cements and other products to the customers, thereby risking increased emissions and would cause Petitioner to face realistic risks of litigation for failure to fulfill supply contracts. Shutting down is estimated to cause economic harm in excess of $1 million to Petitioner during March 2025.

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

Curtailment or termination of operations instead of obtaining a variance is not a feasible option for Petitioner. Petitioner has a viable means to repair and re-test the RTO without shutting down all facility operations.

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, skip to No. 20.

Pollutant	(A) Total Estimated Excess Emissions (lbs/day)	(B) Reduction Due to Mitigation (lbs/day)	(C) Net Emissions After Mitigation (lbs/day)
There will be excess volatile organic compound ("VOC") emissions of 0.5 pounds per day during the variance period, as IPS reported in its February 26, 2025 Semiannual Monitoring ("SAM") Report. Petitioner shall mitigate emissions by optimizing temperature and other performance parameters. Mitigation measures associated with operating equipment at required temperature and other performance parameters cannot be quantified in pounds per day.			

*Column A minus Column B = Column C

Excess Opacity: N/A %

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

See paragraph 19.

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.

See paragraph 14. In addition, Petitioner proposes the following variance conditions:

1. Petitioner shall, on a daily basis, visually inspect RTO No. G10605 ("Equipment") and shall record its observations with regard to temperature and other observable factors associated with the Equipment, including but not limited to visible emissions.
2. Petitioner shall make the monitoring records set forth above available to its inspector Arely Gil Rojas upon request.
3. Petitioner shall notify the District at 1-800-CUT-SMOG and by telephone and e-mail to Arely Gil Rojas at 909-396-2183 and arojas@aqmd.gov within 24 hours of commencing work to replace the ceramic media on the Equipment.
4. Petitioner shall take steps to expedite source testing after work to replace the ceramic media concludes.
5. Petitioner shall notify the District at 1-800-CUT-SMOG and by telephone and e-mail to Arely Gil Rojas at 909-396-2183 and arojas@aqmd.gov 24 hours prior to source testing on the Equipment.
6. Petitioner shall pay applicable excess emission fees to the Clerk of the Board within fifteen (15) business days of the commencement of the variance period or the variance shall be invalidated pursuant to Rule 303.
7. Petitioner shall notify the Clerk of the Board and its inspector Arely Gil Rojas in writing when compliance is achieved.

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.

Emissions will be quantified based on the emission estimates provided in the February 26, 2025 SAM report.

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 processes changes to be made, permit conditions to be amended, etc., dates by which the actions will be completed, and an estimate of total costs.

See paragraph 4 and 14.

24. State the date by which you expect to achieve final compliance: April 30, 2025

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.

Not Applicable

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

Arely Gil Rojas	909-396-2183
Frederic Chung	909-396-3225

FOR THE FOREGOING REASONS, Petitioner requests that it be granted the relief requested.

Dated: March 12, 2025

Respectfully Submitted,

Viviana L. Heger
DUANE MORRIS

Viviana L. Heger
Attorney for Petitioner
IPS Corporation

EXHIBIT A

FACILITY PERMIT TO OPERATE
IPS CORPORATION

PERMIT TO OPERATE

Permit No. M42127
A/N 127024

Equipment Description:

Station No. 3, Container-Filling.

Conditions:

1. Operation of this equipment shall be conducted in compliance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.
[Rule 204]

2. This equipment shall be properly maintained and kept in good operating condition at all times.
[Rule 204]

3. This equipment shall not be operated unless it is vented to air pollution control equipment which is in full use and which has been issued a valid permit by the Executive Officer.
[Rule 1303(a)(1)-BACT, 1303(b)(2)-Offset]

Emissions and Requirements:

4. This equipment is subject to the applicable requirements of the following rules and regulations:

VOC: Rule 1168, see Appendix B for emission limits
VOC: Rule 1171, see Appendix B for emission limits
VOC: Rule 109

FACILITY PERMIT TO OPERATE
IPS CORPORATION

PERMIT TO OPERATE

Permit No. G6402
A/N 501717

Equipment Description:

Station No. 21, Container-Filling, IME, Series 2400, with 12 Nozzles.

Conditions:

1. Operation of this equipment shall be conducted in compliance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.
[Rule 204]

2. This equipment shall be properly maintained and kept in good operating condition at all times.
[Rule 204]

3. This equipment shall not be operated unless it is vented only to air pollution control equipment which is in full use and which has been issued a permit to operate by the Executive Officer.
[Rule 1303(b)(2)-Offset, 1303(a)(1)-BACT]

4. The operator shall limit the throughput of the material processed in filling stations nos. 21, 22, and 23 to not more than 800,000 gallons of material in any one month.
[Rule 1303(b)(2)-Offset]

5. Materials used in this equipment shall not contain any toxic air contaminants identified Rule 1401, Table I, with an effective date of March 4, 2005 or earlier, except for methyl ethyl ketone (CAS No. 78-93-3) and toluene (CAS No. 108-88-3).
[Rule 1401]

Periodic Monitoring:

6. The operator shall maintain adequate records to verify compliance with Condition No. 4 above. Such records shall be kept on the premises for at least five years and be made available to the Executive Officer or his representative upon request.
[Rule 3004(a)(4)]

Emissions and Requirements:

7. This equipment is subject to the applicable requirements of the following rules and regulations:

VOC: Rule 1168, see Appendix B for emission limits
VOC: Rule 1171, see Appendix B for emission limits
VOC: Rule 109

FACILITY PERMIT TO OPERATE
IPS CORPORATION

PERMIT TO OPERATE

Permit No. G6404
A/N 501718

Equipment Description:

Station no. 22, Container-Filling, IME, Series 2400, with 12 Nozzles.

Conditions:

1. Operation of this equipment shall be conducted in compliance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.
[Rule 204]

2. This equipment shall be properly maintained and kept in good operating condition at all times.
[Rule 204]

3. This equipment shall not be operated unless it is vented only to air pollution control equipment which is in full use and which has been issued a permit to operate by the Executive Officer.
[Rule 1303(b)(2)-Offset, 1303(a)(1)-BACT]

4. The operator shall limit the throughput of the material processed in filling stations nos. 21, 22, and 23 to not more than 800,000 gallons of material in any one month.
[Rule 1303(b)(2)-Offset]

5. Materials used in this equipment shall not contain any toxic air contaminants identified Rule 1401, Table I, with an effective date of March 4, 2005 or earlier, except for methyl ethyl ketone (CAS No. 78-93-3) and toluene (CAS No. 108-88-3).
[Rule 1401]

Periodic Monitoring:

6. The operator shall maintain adequate records to verify compliance with Condition No. 4 above. Such records shall be kept on the premises for at least five years and be made available to the Executive Officer or his representative upon request.
[Rule 3004(a)(4)]

Emissions and Requirements:

7. This equipment is subject to the applicable requirements of the following rules and regulations:

VOC: Rule 1168, see Appendix B for emission limits
VOC: Rule 1171, see Appendix B for emission limits
VOC: Rule 109

FACILITY PERMIT TO OPERATE
IPS CORPORATION

PERMIT TO OPERATE

Permit No. G10603
A/N 497969

Equipment Description:

Station No. 23, Container-Filling, IME, Series 2400, with 12 Nozzles.

Conditions:

1. Operation of this equipment shall be conducted in compliance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.
[Rule 204]

2. This equipment shall be properly maintained and kept in good operating condition at all times.
[Rule 204]

3. This equipment shall not be operated unless it is vented only to air pollution control equipment which is in full use and which has been issued a permit to construct by the Executive Officer.
[Rule 1303(b)(2)-Offset, 1303(a)(1)-BACT]

4. The operator shall limit the throughput of the material processed in filling stations nos. 21, 22, and 23 to not more than 800,000 gallons of material in any one month.
[Rule 1303(b)(2)-Offset]

5. Materials used in this equipment shall not contain any toxic air contaminants identified Rule 1401, Table I, with an effective date of March 4, 2005 or earlier, except for methyl ethyl ketone (CAS No. 78-93-3) and toluene (CAS No. 108-88-3).
[Rule 1401]

Periodic Monitoring:

6. The operator shall maintain adequate records to verify compliance with Condition No. 4 above. Such records shall be kept on the premises for at least five years and be made available to the Executive Officer or his representative upon request.
[Rule 3004(a)(4)]

Emissions and Requirements:

7. This equipment is subject to the applicable requirements of the following rules and regulations:

VOC: Rule 1168, see Appendix B for emission limits
VOC: Rule 1171, see Appendix B for emission limits
VOC: Rule 109

FACILITY PERMIT TO OPERATE
IPS CORPORATION

PERMIT TO OPERATE

Permit No. G10605
A/N 497967

Equipment Description:

Air Pollution Control System consisting of:

1. Regenerative Thermal Oxidizer, Adwest Technologies, Model 8.0 RTO95, with a Maxon Kinemax 3G Natural Gas-Fired Burner, 2,295,000 BTU per Hour, Two Combustion Chambers, 360 cu. ft. Total Volume, Two Ceramic beds, 6'-4" W. x 8'-6" L. x 4'-0" H., and a 7.5 HP Combustion blower.

2. Exhaust System with 40 HP Blower venting:

   A. Filling Room Permanent Total Enclosure (PTE), 49'-0" W. x 55'-0" L. x 23'-0" H. Overall, with Four Container Filling Station Nos. 3, 21, 22, and 23.
   B. Twelve Mixing Tanks and Five Storage Tanks.

Conditions:

1. Operation of this equipment shall be conducted in compliance with all data and specifications submitted with the application under which this permit is issued unless otherwise noted below.
   [Rule 204]

2. This equipment shall be properly maintained and kept in good operating condition at all times.
   [Rule 204]

3. The oxidizer shall be fired on natural gas only.
   [Rule 1303(a)(1)-BACT]

4. All access doors to the permanent total enclosures shall be kept closed during normal operations.
   [Rule 1303(a)(1)-BACT]

5. The operator shall maintain and operate the permanent total enclosure to comply with all criteria specified in EPA Method 204.
   [Rule 1303(a)(1)-BACT]

6. This equipment shall be maintained and operated at a minimum destruction efficiency of 99% and an overall VOC control efficiency (collection and destruction) of 99% when the basic equipment it serves is in operation.
   [Rule 1303(a)(1)-BACT, 40 CFR63 Subpart FFFF]

7. The burner of the regenerative thermal oxidizer shall only be used for the start-up of the equipment before the process air stream from the filling operations is introduced into the oxidizer.
   [Rule 1303(a)(1)-BACT, 1303(b)(2)-offset]

8. The operator shall operate and maintain the regenerative thermal oxidizer according to the following requirements:

   The combustion chamber temperature shall be maintained at a minimum of 1,500 degrees Fahrenheit whenever the equipment it serves is in operation.

FACILITY PERMIT TO OPERATE
IPS CORPORATION

PERMIT TO OPERATE

Permit No. G6381
A/N 497948

Equipment Description:

Mixer MM-1, 6'-5" Dia. x 6'-0" H., 1,400 Gallon Capacity, with Two Agitators, 50 HP Total, and a Vapor Condenser.

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.
[Rule 204]

2. This equipment shall be properly maintained and kept in good operating condition at all times.
[Rule 204]

3. This equipment shall not be operated unless it is vented to air pollution control equipment which is in full use and which has been issued a permit to operate by the Executive Officer.
[Rule 1303(b)(2)-Offset, 1303(a)(1)-BACT]

4. The charging port or hatch shall remain closed except during the charging of the mixer or obtaining quality control samples.
[Rule 1303(a)(1)-BACT]

Periodic Monitoring:

5. The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on an annual basis, at least, unless the equipment did not operate during the entire annual period. The routine annual inspection shall be conducted while the equipment is in operation and during daylight hours. If any visible emissions (not including condensed water vapor) are detected that last more than three minutes in any one-hour, the operator shall either:

   A. Verify and certify within 24 hours that the equipment causing the emission and any associated air pollution control equipment are operating normally according to their design and standard procedures and under the same conditions under which compliance was achieved in the past;

   B. Take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit; or

   C. Have a CARB-certified smoke reader determine compliance with the opacity standard, using EPA Method 9 or the procedures in the carb manual "Visible Emission Evaluation", within three business days and report any deviations to South Coast AQMD.

   The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

   A. Stack or emission point identification;
   B. Description of any corrective actions taken to abate visible emissions;
   C. Date and time visible emission was abated; and
   D. Visible emission observation recorded by a certified smoke reader.
   [Rule 3004(a)(4)]

FACILITY PERMIT TO OPERATE
IPS CORPORATION

PERMIT TO OPERATE

Permit No. G12140
A/N 518289

Equipment Description:

Mixer MM-2, 6'-5" Dia. x 6'-0" H., 1,400 Gallon Capacity, with Two Agitators, 30 HP Each, and a Vapor Condenser.

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.
[Rule 204]

2. This equipment shall be properly maintained and kept in good operating condition at all times.
[Rule 204]

3. This equipment shall not be operated unless it is vented to air pollution control equipment which is in full use and which has been issued a permit to operate by the Executive Officer.
[Rule 1303(b)(2)-Offset, 1303(a)(1)-BACT]

4. The charging port or hatch shall remain closed except during the charging of the mixer or obtaining quality control samples.
[Rule 1303(a)(1)-BACT]

Periodic Monitoring:

5. The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on an annual basis, at least, unless the equipment did not operate during the entire annual period. The routine annual inspection shall be conducted while the equipment is in operation and during daylight hours. If any visible emissions (not including condensed water vapor) are detected that last more than three minutes in any one-hour, the operator shall either:

   A. Verify and certify within 24 hours that the equipment causing the emission and any associated air pollution control equipment are operating normally according to their design and standard procedures and under the same conditions under which compliance was achieved in the past;

   B. Take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit; or

   C. Have a CARB-certified smoke reader determine compliance with the opacity standard, using EPA Method 9 or the procedures in the CARB manual "Visible Emission Evaluation", within three business days and report any deviations to South Coast AQMD.

   The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

   A. Stack or emission point identification;
   B. Description of any corrective actions taken to abate visible emissions;
   C. Date and time visible emission was abated; and
   D. Visible emission observation recorded by a certified smoke reader.

   [Rule 3004(a)(4)]

FACILITY PERMIT TO OPERATE
IPS CORPORATION

PERMIT TO OPERATE

Permit No. G12139
A/N 518290

Equipment Description:

Mixer MM-3, 6'-5" Dia. x 7'-0" H., 1,600 Gallon Capacity, with Two Agitators, 40 HP Each, and a Vapor Condenser.

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.
[Rule 204]

2. This equipment shall be properly maintained and kept in good operating condition at all times.
[Rule 204]

3. This equipment shall not be operated unless it is vented to air pollution control equipment which is in full use and which has been issued a permit to operate by the Executive Officer.
[Rule 1303(b)(2)-Offset, 1303(a)(1)-BACT]

4. The charging port or hatch shall remain closed except during the charging of the mixer or obtaining quality control samples.
[Rule 1303(a)(1)-BACT]

Periodic Monitoring:

5. The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on an annual basis, at least, unless the equipment did not operate during the entire annual period. The routine annual inspection shall be conducted while the equipment is in operation and during daylight hours. If any visible emissions (not including condensed water vapor) are detected that last more than three minutes in any one-hour, the operator shall either:

   A. Verify and certify within 24 hours that the equipment causing the emission and any associated air pollution control equipment are operating normally according to their design and standard procedures and under the same conditions under which compliance was achieved in the past;

   B. Take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit; or

   C. Have a CARB-certified smoke reader determine compliance with the opacity standard, using EPA Method 9 or the procedures in the CARB manual "Visible Emission Evaluation", within three business days and report any deviations to South Coast AQMD.

   The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

   A. Stack or emission point identification;

   B. Description of any corrective actions taken to abate visible emissions;

   C. Date and time visible emission was abated; and

   D. Visible emission observation recorded by a certified smoke reader.

FACILITY PERMIT TO OPERATE
IPS CORPORATION

PERMIT TO OPERATE

Permit No. G12138
A/N 518291

Equipment Description:

Mixer MM-4, 6'-5" Dia. x 6'-0" H., 1,400 Gallon Capacity, with Two Agitators, 30 HP Each, and a Vapor Condenser.

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.
[Rule 204]

2. This equipment shall be properly maintained and kept in good operating condition at all times.
[Rule 204]

3. This equipment shall not be operated unless it is vented to air pollution control equipment which is in full use and which has been issued a permit to operate by the Executive Officer.
[Rule 1303(b)(2)-Offset, 1303(a)(1)-BACT]

4. The charging port or hatch shall remain closed except during the charging of the mixer or obtaining quality control samples.
[Rule 1303(a)(1)-BACT]

Periodic Monitoring:

5. The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on an annual basis, at least, unless the equipment did not operate during the entire annual period. The routine annual inspection shall be conducted while the equipment is in operation and during daylight hours. If any visible emissions (not including condensed water vapor) are detected that last more than three minutes in any one-hour, the operator shall either:

   A. Verify and certify within 24 hours that the equipment causing the emission and any associated air pollution control equipment are operating normally according to their design and standard procedures and under the same conditions under which compliance was achieved in the past;

   B. Take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit; or

   C. Have a CARB-certified smoke reader determine compliance with the opacity standard, using EPA Method 9 or the procedures in the CARB manual "Visible Emission Evaluation", within three business days and report any deviations to South Coast AQMD.

   The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

   A. Stack or emission point identification;
   B. Description of any corrective actions taken to abate visible emissions;
   C. Date and time visible emission was abated; and
   D. Visible emission observation recorded by a certified smoke reader.

FACILITY PERMIT TO OPERATE
IPS CORPORATION

PERMIT TO OPERATE

Permit No. G6384
A/N 497952

Equipment Description:

Mixer MM-5, 6'-5" Dia. x 6'-0" H., 1,400 Gallon Capacity, with Two Agitators, 50 HP Total, and a Vapor Condenser.

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.
[Rule 204]

2. This equipment shall be properly maintained and kept in good operating condition at all times.
[Rule 204]

3. This equipment shall not be operated unless it is vented to air pollution control equipment which is in full use and which has been issued a permit to operate by the Executive Officer.
[Rule 1303(b)(2)-Offset, 1303(a)(1)-BACT]

4. The charging port or hatch shall remain closed except during the charging of the mixer or obtaining quality control samples.
[Rule 1303(a)(1)-BACT]

Periodic Monitoring:

5. The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on an annual basis, at least, unless the equipment did not operate during the entire annual period. The routine annual inspection shall be conducted while the equipment is in operation and during daylight hours. If any visible emissions (not including condensed water vapor) are detected that last more than three minutes in any one-hour, the operator shall either:

   A. Verify and certify within 24 hours that the equipment causing the emission and any associated air pollution control equipment are operating normally according to their design and standard procedures and under the same conditions under which compliance was achieved in the past;

   B. Take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit; or

   C. Have a CARB-certified smoke reader determine compliance with the opacity standard, using EPA Method 9 or the procedures in the CARB manual "Visible Emission Evaluation", within three business days and report any deviations to South Coast AQMD.

   The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

   A. Stack or emission point identification;
   B. Description of any corrective actions taken to abate visible emissions;
   C. Date and time visible emission was abated; and
   D. Visible emission observation recorded by a certified smoke reader.

FACILITY PERMIT TO OPERATE
IPS CORPORATION

PERMIT TO OPERATE

Permit No. G6385
A/N 497953

Equipment Description:

Mixer MM-6, 6'-5" Dia. x 6'-0" H., 1,400 Gallon Capacity, with Two Agitators, 50 HP Total, and a Vapor Condenser.

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.
[Rule 204]

2. This equipment shall be properly maintained and kept in good operating condition at all times.
[Rule 204]

3. This equipment shall not be operated unless it is vented to air pollution control equipment which is in full use and which has been issued a permit to operate by the Executive Officer.
[Rule 1303(b)(2)-Offset, 1303(a)(1)-BACT]

4. The charging port or hatch shall remain closed except during the charging of the mixer or obtaining quality control samples.
[Rule 1303(a)(1)-BACT]

Periodic Monitoring:

5. The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on an annual basis, at least, unless the equipment did not operate during the entire annual period. The routine annual inspection shall be conducted while the equipment is in operation and during daylight hours. If any visible emissions (not including condensed water vapor) are detected that last more than three minutes in any one-hour, the operator shall either:

   A. Verify and certify within 24 hours that the equipment causing the emission and any associated air pollution control equipment are operating normally according to their design and standard procedures and under the same conditions under which compliance was achieved in the past;

   B. Take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit; or

   C. Have a CARB-certified smoke reader determine compliance with the opacity standard, using EPA Method 9 or the procedures in the CARB manual "Visible Emission Evaluation", within three business days and report any deviations to South Coast AQMD.

   The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

   A. Stack or emission point identification;
   B. Description of any corrective actions taken to abate visible emissions;
   C. Date and time visible emission was abated; and
   D. Visible emission observation recorded by a certified smoke reader.
   [Rule 3004(a)(4)]

FACILITY PERMIT TO OPERATE
IPS CORPORATION

PERMIT TO OPERATE

Permit No. G12137
A/N 518292

Equipment Description

Mixer MM-7, Unheated, 5'-11" Dia. x 7'-7" H., 1,600 Gallon Capacity, with Two Agitators, 30 HP Each, and a Vapor Condenser.

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.
[Rule 204]

2. This equipment shall be properly maintained and kept in good operating condition at all times.
[Rule 204]

3. This equipment shall not be operated unless it is vented to air pollution control equipment which is in full use and which has been issued a permit to operate by the Executive Officer.
[Rule 1303(b)(2)-Offset, 1303(a)(1)-BACT]

4. The charging port or hatch shall remain closed except during the charging of the mixer.
[Rule 1303(a)(1)-BACT]

5. This mixer shall only be used to mix pipe cement and primer materials.
[Rule 1303(a)(1)-BACT]

6. The operator shall limit the throughput of the material processed in mixers MM-7, MM-8, MM-9, MM-10, MM-11, MM-12, BM-11, BM-12, BM-13, BM-14, BM-15, BM-16, and BM-17 to not more than 525,000 gallons of material in any calendar month.
[Rule 1303(b)(2)-Offset]

Periodic Monitoring:

7. The operator shall maintain adequate records to verify compliance with Condition Nos. 5 and 6 above. Such records shall be kept on the premises for at least five years and made available to the Executive Officer or his representative upon request.
[Rule 3004(a)(4)]

8. Safety data sheets for all materials used in this equipment shall be kept and be made available to the Executive Officer or his representative upon request.
[Rule 3004(a)(4)]

9. The operator shall perform semi-annual inspection of the equipment to ensure that the movable covers are closed. The operator shall keep records, in a manner approved by the South Coast AQMD, for the following parameter(s) or item(s):

   a. Name of the person performing the inspection of the cover.

   b. Date, time and result of the inspection.

FACILITY PERMIT TO OPERATE
IPS CORPORATION

PERMIT TO OPERATE

Permit No. G6387
A/N 497955

Equipment Description:

Mixer MM-8, Unheated, 5'-11" Dia. x 6'-8" H., 1,500 Gallon Capacity, with a 10 HP Agitator.

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.
[Rule 204]

2. This equipment shall be properly maintained and kept in good operating condition at all times.
[Rule 204]

3. This equipment shall not be operated unless it is vented to air pollution control equipment which is in full use and which has been issued a permit to operate by the Executive Officer.
[Rule 1303(a)(1)-BACT, 1303(b)(2)-offset]

4. This mixer shall not be charged with dry materials.
[Rule 1303(a)(1)-BACT, 1303(b)(2)-offset]

5. The charging port or hatch shall remain closed except during the charging of the mixer.
[Rule 1303(a)(1)-BACT]

6. This mixer shall only be used to mix primer materials.
[Rule 1303(a)(1)-BACT]

7. The operator shall limit the throughput of the material processed in mixers MM-7, MM-8, MM-9, MM-10, MM-11, MM-12, BM-11, BM-12, BM-13, BM-14, BM-15, BM-16, and BM-17 to not more than 525,000 gallons of material in any one month.
[Rule 1303(b)(2)-Offset]

Periodic Monitoring:

8. The operator shall maintain adequate records to verify compliance with Condition Nos. 6 and 7 above. Such records shall be kept on the premises for at least five years and be made available to the Executive Officer or his representative upon request.
[Rule 3004(a)(4)]

9. Safety data sheets for all materials used in this equipment shall be kept and be made available to Executive Officer or his representative upon request.
[Rule 3004(a)(4)]

10. The operator shall perform semi-annual inspection of the equipment to ensure that the movable covers are closed. The operator shall keep records, in a manner approved by the South Coast AQMD, for the following parameter(s) or item(s):

    A. Name of the person performing the inspection of the cover.

    B. Date, time and result of the inspection.

FACILITY PERMIT TO OPERATE
IPS CORPORATION

PERMIT TO OPERATE

Permit No. G6388
A/N 497956

Equipment Description:

Mixer MM-9, Unheated, 5'-11" Dia. x 6'-8" H., 1,500 Gallon Capacity, with a 10 HP Agitator

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.
[Rule 204]

2. This equipment shall be properly maintained and kept in good operating condition at all times.
[Rule 204]

3. This equipment shall not be operated unless it is vented to air pollution control equipment which is in full use and which has been issued a PERMIT TO OPERATE by the Executive Officer.
[Rule 1303(a)(1)-BACT, 1303(b)(2)-offset]

4. This mixer shall not be charged with dry materials.
[Rule 1303(a)(1)-BACT, 1303(b)(2)-offset]

5. The charging port or hatch shall remain closed except during the charging of the mixer.
[Rule 1303(a)(1)-BACT]

6. This mixer shall only be used to mix plastic primer materials.
[Rule 1303(a)(1)-BACT]

7. The operator shall limit the throughput of the material processed in mixers MM-7, MM-8, MM-9, MM-10, MM-11, MM-12, BM-11, BM-12, BM-13, BM-14, BM-15, BM-16, and BM-17 to not more than 525,000 gallons of material in any one month.
[Rule 1303(b)(2)-Offset]

Periodic Monitoring:

8. The operator shall maintain adequate records to verify compliance with Condition Nos. 6 and 7 above. Such records shall be kept on the premises for at least five years and be made available to the Executive Officer or his representative upon request.
[Rule 3004(a)(4)]

9. Safety data sheets for all materials used in this equipment shall be kept and be made available to Executive Officer or his representative upon request.
[Rule 3004(a)(4)]

10. The operator shall perform semi-annual inspection of the equipment to ensure that the movable covers are closed. The operator shall keep records, in a manner approved by the South Coast AQMD, for the following parameter(s) or item(s):

    a. Name of the person performing the inspection of the cover.

FACILITY PERMIT TO OPERATE
IPS CORPORATION

PERMIT TO OPERATE

Permit No. G6390
A/N 497957

Equipment Description:

Mixer MM-10, Unheated, 5'-11" Dia. x 6'-8" H., 1,500 Gallon Capacity, with a 10 HP Agitator.

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.
[Rule 204]

2. This equipment shall be properly maintained and kept in good operating condition at all times.
[Rule 204]

3. This equipment shall not be operated unless it is vented to air pollution control equipment which is in full use and which has been issued a permit to operate by the Executive Officer.
[Rule 1303(a)(1)-BACT, 1303(b)(2)-offset]

4. This mixer shall not be charged with dry materials.
[Rule 1303(a)(1)-BACT, 1303(b)(2)-offset]

5. The charging port or hatch shall remain closed except during the charging of the mixer.
[Rule 1303(a)(1)-BACT]

6. This mixer shall only be used to mix plastic primer materials.
[Rule 1303(a)(1)-BACT]

7. The operator shall limit the throughput of the material processed in mixers MM-7, MM-8, MM-9, MM-10, MM-11, MM-12, BM-11, BM-12, BM-13, BM-14, BM-15, BM-16, and BM-17 to not more than 525,000 gallons of material in any one month.
[Rule 1303(b)(2)-Offset]

Periodic Monitoring:

8. The operator shall maintain adequate records to verify compliance with Condition Nos. 6 and 7 above. Such records shall be kept on the premises for at least five years and be made available to the Executive Officer or his representative upon request.
[Rule 3004(a)(4)]

9. Safety data sheets for all materials used in this equipment shall be kept and be made available to Executive Officer or his representative upon request.
[Rule 3004(a)(4)]

10. The operator shall perform semi-annual inspection of the equipment to ensure that the movable covers are closed. The operator shall keep records, in a manner approved by the South Coast AQMD, for the following parameter(s) or item(s):

    A. Name of the person performing the inspection of the cover.

    B. Date, time and result of the inspection.

FACILITY PERMIT TO OPERATE
IPS CORPORATION

PERMIT TO OPERATE

Permit No. G6391
A/N 497958

Equipment Description:

Mixer MM-11, Unheated, 6'-6" Dia. x 7'-0" H., 1,600 Gallon Capacity, with a 10 HP Agitator.

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.
[Rule 204]

2. This equipment shall be properly maintained and kept in good operating condition at all times.
[Rule 204]

3. This equipment shall not be operated unless it is vented to air pollution control equipment which is in full use and which has been issued a permit to operate by the Executive Officer.
[Rule 1303(b)(2)-Offset, 1303(a)(1)-BACT]

4. The charging port or hatch shall remain closed except during the charging of the mixer.
[Rule 1303(a)(1)-BACT]

5. This mixer shall only be used to mix pipe cement and plastic primer materials.
[Rule 1303(a)(1)-BACT]

6. The operator shall limit the throughput of the material processed in mixers MM-7, MM-8, MM-9, MM-10, MM-11, MM-12, BM-11, BM-12, BM-13, BM-14, BM-15, BM-16, and BM-17 to not more than 525,000 gallons of material in any one month.
[Rule 1303(b)(2)-Offset]

Periodic Monitoring:

7. The operator shall maintain adequate records to verify compliance with Condition Nos. 5 and 6 above. Such records shall be kept on the premises for at least five years and be made available to the Executive Officer or his representative upon request.
[Rule 3004(a)(4)]

8. Safety data sheets for all materials used in this equipment shall be kept and be made available to the Executive Officer or his representative upon request.
[Rule 3004(a)(4)]

9. The operator shall perform semi-annual inspection of the equipment to ensure that the movable covers are closed. The operator shall keep records, in a manner approved by the South Coast AQMD, for the following parameter(s) or item(s):

   a. Name of the person performing the inspection of the cover.

   b. Date, time and result of the inspection.

[Rule 3004(a)(4)]

FACILITY PERMIT TO OPERATE
IPS CORPORATION

PERMIT TO OPERATE

Permit No. G6392
A/N 497959

Equipment Description:

Mixer MM-12, Unheated, 6'- 6" Dia. x 7'-0" H., 1,600 Gallon Capacity, with Three Agitators, 81 HP Total, and a Vapor Condenser.

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.
[Rule 204]

2. This equipment shall be properly maintained and kept in good operating condition at all times.
[Rule 204]

3. This equipment shall not be operated unless it is vented to air pollution control equipment which is in full use and which has been issued a permit to operate by the Executive Officer.
[Rule 1303(b)(2)-Offset, 1303(a)(1)-BACT]

4. The charging port or hatch shall remain closed except during the charging of the mixer.
[Rule 1303(a)(1)-BACT]

5. This mixer shall only be used to mix pipe cement and primer materials.
[Rule 1303(b)(2)-Offset]

6. The operator shall limit the throughput of the material processed in mixers MM-7, MM-8, MM-9, MM-10, MM-11, MM-12, BM-11, BM-12, BM-13, BM-14, BM-15, BM-16, and BM-17 to not more than 525,000 gallons of material in any one month.
[Rule 1303(b)(2)-Offset]

Periodic Monitoring:

7. The operator shall maintain adequate records to verify compliance with Condition Nos. 5 and 6 above. Such records shall be kept on the premises for at least five years and be made available to the Executive Officer or his representative upon request.
[Rule 3004(a)(4)]

8. Safety data sheets for all materials used in this equipment shall be kept and be made available to the Executive Officer or his representative upon request.
[Rule 3004(a)(4)]

9. The operator shall perform semi-annual inspection of the equipment to ensure that the movable covers are closed. The operator shall keep records, in a manner approved by the South Coast AQMD, for the following parameter(s) or item(s):

   A. Name of the person performing the inspection of the cover.

   B. Date, time and result of the inspection.

   [Rule 3004(a)(4)]

FACILITY PERMIT TO OPERATE
IPS CORPORATION

PERMIT TO OPERATE

Permit No. G12141
A/N 518288

Equipment Description:

Storage tank H-1, Finished Product, 6'-5" Dia. x 6'-0" H., 1,400 Gallons Capacity, with a 1.5 HP Agitator.

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.
[Rule 204]

2. This equipment shall be properly maintained and kept in good operating condition at all times.
[Rule 204]

3. This tank shall not be used to store a material having a vapor pressure greater than 190 mmHg at 68 degrees Fahrenheit.
[Rule 1303(b)(2)-Offset]

4. This tank shall not be operated unless it is vented to air pollution control equipment which is in full use and which has been issued a permit to operate by the Executive Officer.
[Rule 1303(b)(2)-Offset, 1303(a)(1)-BACT]

Periodic Monitoring:

5. The operator shall keep records, in a manner approved by the South Coast AQMD, for the following parameter(s) or item(s):

   A. Record the name of the material.
   B. Record the vapor pressure in mmHg of each material.
   [Rule 3004(a)(4)]

Emissions and Requirements:

6. This equipment is subject to the applicable requirements of the following rules and regulations:

   VOC: Rule 1171, see Appendix B for emission limits
   VOC: Rule 109

FACILITY PERMIT TO OPERATE
IPS CORPORATION

PERMIT TO OPERATE

Permit No. F97834
A/N 456678

Equipment Description:

Storage Tank H-2, Finished Product, 6'-5" Dia. x 6'-0" H., 1,400 Gallons Capacity, with a 1 HP Agitator.

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.
[Rule 204]

2. This equipment shall be properly maintained and kept in good operating condition at all times.
[Rule 204]

3. This tank shall not be used to store a material having a vapor pressure greater than 190 mmHg at 68 degrees Fahrenheit.
[Rule 1303(b)(2)-Offset]

4. This tank shall not be operated unless it is vented to air pollution control equipment which is in full use and which has been issued a permit to operate by the Executive Officer.
[Rule 1303(b)(2)-Offset, 1303(a)(1)-BACT]

Periodic Monitoring:

5. The operator shall keep records, in a manner approved by the South Coast AQMD, for the following parameter(s) or item(s):

   A. Record the name of the material.
   B. Record the vapor pressure in mmHg of each material.
   [Rule 3004(a)(4)]

Emissions and Requirements:

6. This equipment is subject to the applicable requirements of the following rules and regulations:

   VOC: Rule 1171, see Appendix B for emission limits
   VOC: Rule 109

FACILITY PERMIT TO OPERATE
IPS CORPORATION

PERMIT TO OPERATE

Permit No. F97835
A/N 456679

Equipment Description:

Storage Tank H-3, Finished Product, 6'-5" Dia. x 6'-0" H., 1,400 Gallons Capacity, with a 1 HP Agitator.

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.
[Rule 204]

2. This equipment shall be properly maintained and kept in good operating condition at all times.
[Rule 204]

3. This tank shall not be used to store a material having a vapor pressure greater than 190 mmHg at 68 degrees Fahrenheit.
[Rule 1303(b)(2)-Offset]

4. This tank shall not be operated unless it is vented to air pollution control equipment which is in full use and which has been issued a permit to operate by the Executive Officer.
[Rule 1303(b)(2)-Offset, 1303(a)(1)-BACT]

Periodic Monitoring:

5. The operator shall keep records, in a manner approved by the South Coast AQMD, for the following parameter(s) or item(s):

   A. Record the name of the material.
   B. Record the vapor pressure in mmHg of each material.
   [Rule 3004(a)(4)]

Emissions and Requirements:

6. This equipment is subject to the applicable requirements of the following rules and regulations:

   VOC: Rule 1171, see Appendix B for emission limits
   VOC: Rule 109

FACILITY PERMIT TO OPERATE
IPS CORPORATION

PERMIT TO OPERATE

Permit No. F97836
A/N 456680

Equipment Description:

Storage Tank H-4, Finished Product, 6'-5" Dia. x 6'-0" H., 1,400 Gallons Capacity, with a 3 HP Agitator.

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.
[Rule 204]

2. This equipment shall be properly maintained and kept in good operating condition at all times.
[Rule 204]

3. This tank shall not be used to store a material having a vapor pressure greater than 190 mmHg at 68 degrees Fahrenheit.
[Rule 1303(b)(2)-Offset]

4. This tank shall not be operated unless it is vented to air pollution control equipment which is in full use and which has been issued a permit to operate by the Executive Officer.
[Rule 1303(b)(2)-Offset, 1303(a)(1)-BACT]

Periodic Monitoring:

5. The operator shall keep records, in a manner approved by the South Coast AQMD, for the following parameter(s) or item(s):

   A. Record the name of the material.
   B. Record the vapor pressure in mmHg of each material.
   [Rule 3004(a)(4)]

Emissions and Requirements:

6. This equipment is subject to the applicable requirements of the following rules and regulations:

   VOC: Rule 1171, see Appendix B for emission limits
   VOC: Rule 109

FACILITY PERMIT TO OPERATE
IPS CORPORATION

PERMIT TO OPERATE

Permit No. F97837
A/N 456681

Equipment Description:

Storage Tank H-5, Finished Product, 6'-5" Dia. x 6'-0" H., 1,400 Gallons Capacity, with a 3 HP Agitator.

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.
[Rule 204]

2. This equipment shall be properly maintained and kept in good operating condition at all times.
[Rule 204]

3. This tank shall not be used to store a material having a vapor pressure greater than 190 mmHg at 68 degrees Fahrenheit.
[Rule 1303(b)(2)-Offset]

4. This tank shall not be operated unless it is vented to air pollution control equipment which is in full use and which has been issued a permit to operate by the Executive Officer
[Rule 1303(b)(2)-Offset, 1303(a)(1)-BACT]

Periodic Monitoring:

5. The operator shall keep records, in a manner approved by the South Coast AQMD, for the following parameter(s) or item(s):

   A. Record the name of the material.
   B. Record the vapor pressure in mmHg of each material.
   [Rule 3004(a)(4)]

Emissions and Requirements:

6. This equipment is subject to the applicable requirements of the following rules and regulations:

   VOC: Rule 1171, see Appendix B for emission limits
   VOC: Rule 109

FACILITY PERMIT TO OPERATE
IPS CORPORATION

SECTION E: ADMINISTRATIVE CONDITIONS

The operating conditions in this section shall apply to all permitted equipment at this facility unless superseded by condition(s) listed elsewhere in this permit.

1. The permit shall remain effective unless this permit is suspended, revoked, modified, reissued, denied, or it is expired for nonpayment of permit processing or annual operating fees. [201, 203, 209, 301]
   a. The permit must be renewed annually by paying annual operating fees, and the permit shall expire if annual operating fees are not paid pursuant to requirements of Rule 301(d). [301(d)]
   b. The Permit to Construct listed in Section H shall expire one year from the Permit to Construct issuance date, unless a Permit to Construct extension has been granted by the Executive Officer or unless the equipment has been constructed and the operator has notified the Executive Officer prior to the operation of the equipment, in which case the Permit to Construct serves as a temporary Permit to Operate. [202, 205]
   c. The Title V permit shall expire as specified under Section K of the Title V permit. The permit expiration date of the Title V facility permit does not supercede the requirements of Rule 205. [205, 3004]
2. The operator shall maintain all equipment in such a manner that ensures proper operation of the equipment. [204]
3. This permit does not authorize the emissions 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 and Regulations of the SCAQMD. This permit cannot be considered as permission to violate existing laws, ordinances, regulations, or statutes of other governmental agencies. [204]
4. The operator shall not use equipment identified in this facility permit as being connected to air pollution control equipment unless they are so vented to the identified air pollution control equipment which is in full use and which has been included in this permit. [204]

FACILITY PERMIT TO OPERATE
IPS CORPORATION

SECTION E: ADMINISTRATIVE CONDITIONS

5. The operator shall not use any equipment having air pollution control device(s) incorporated within the equipment unless the air pollution control device is in full operation. [204]

6. The operator shall maintain records to demonstrate compliance with rules or permit conditions that limit equipment operating parameters, or the type or quantity of material processed. These records shall be made available to SCAQMD personnel upon request and be maintained for at least five years. [204]

7. The operator shall maintain and operate all equipment to ensure compliance with all emission limits as specified in this facility permit. Compliance with emission limits shall be determined according to the following specifications, unless otherwise specified by SCAQMD rules or permit conditions: [204]

   a. For internal combustion engines and gas turbines, measured concentrations shal be corrected to 15 percent stack-gas oxygen content on a dry basis and be averaged over a period of 15 consecutive minutes; [1110.2, 1134]

   b. For other combustion devices, measured concentrations shall be corrected to 3 percent stack-gas oxygen content on a dry basis and be averaged over a period of 15 consecutive minutes; [1146, 1146.1, 204]

   c. For non-combustion sources, compliance with emission limits shall be determined and averaged over a period of 60 minutes; [204]

   d. For the purpose of determining compliance with Rule 407, carbon monoxide (CO) shall be measured on a dry basis and be averaged over 15 consecutive minutes, and sulfur compounds which would exist as liquid or gas at standard conditions shall be calculated as sulfur dioxide (SO2) and be averaged over 15 consecutive minutes; [407]

   e. For the purpose of determining compliance with Rule 409, combustion contaminant emission measurements shall be corrected to 12 percent of carbon dioxide (CO2) at standard conditions and averaged over a minimum of 15 consecutive minutes. [409]

EXHIBIT B

ADWEST TECHNOLOGIES, INC.

April 09, 2009

IPS Corporation
Weld-On
17109 S. Main Street
Gardena, California 90248

Attention: Jeff Cox e-mail: jeff.cox@ipscorp.com

Reference: RETOX Dual Chamber Regenerative Thermal Oxidizer System
Application: Process VOC Emissions
Our Reference: Job No. 2549 8.0 RTO-95 Serial Number 2343
Job No. 2559 6.0 RTO-95 Serial Number 2354

Dear Mr. Cox:

The Adwest Technologies, Inc. regenerative thermal oxidizers (Job Number 2549 - 8,000 SCFM and Job Number 2559 – 6,000 SCFM) will operate and achieve > 99% DRE with the additional air volume and VOC loading from the mixing tanks. (See 'Performance Guarantee' below)

PERFORMANCE GUARANTEE:

1.A We make the following Performance Guarantee: If all of the Performance Conditions are satisfied, then the Equipment will reduce the concentration of hydrocarbons measured at the discharge stack of the Equipment as compared to the concentration of hydrocarbons measured at the inlet of Equipment by an average of 99% or down to 25 ppm as C_1 in the stack. The Performance Conditions are defined in this specification under the heading of "Design Criteria". The Equipment must be operated within design limits of 1500°F to 1600°F oxidation temperature. 1500°F should be specified for air quality permitting purposes.

1.B Nitrogen Oxides-We make the following NOx Performance Guarantee: If all of the Performance Conditions are satisfied and the equipment is operated within design parameters as specified in the "Design Criteria" section, the equipment will perform such that the total concentration of NOx as measured (i.e. uncorrected to 3% of oxygen) at the discharge stack will not exceed 2 PPMv. This guarantee is predicated upon an inlet NOx concentration of 0 PPMv and no nitrogenated hydrocarbons or compounds including ammonia in the process exhaust.

2. The only Performance Guarantee made is that which is expressly stated in Paragraph 1A, 1B and 1C above. All other performance data contained in this Proposal or this Agreement or elsewhere are estimates or are for purposes of illustration only, and are not guaranteed.

ADWEST
TECHNOLOGIES, INC.

3. The Performance Tests for determining whether the Performance Guarantee is satisfied shall be ineffective unless first reviewed and approved by us. We shall have the right and opportunity to witness the Performance Tests. In any event, the Performance Tests shall consist of simultaneous measurements of hydrocarbon solvent loadings at the inlet and discharge stack, and methane, ethane or other natural gas injection hydrocarbon contribution shall be deducted from the measurements at the discharge stack. Performance Tests shall be at your expense, except as provided in Paragraph 4 below, and if the Performance Tests for any unit of Equipment are not completed before the expiration of the Test Limitation Period for that unit, which shall expire 12 months from date of shipment, then that unit of Equipment shall be deemed to have satisfied the Performance Guarantee, and we shall have no further obligation under this Performance Guarantee as to that unit.

4. If any unit of Equipment does not satisfy the Performance Guarantee as determined by the Performance Tests, then we shall, at our option, either: (a) repair, replace, or modify such unit of Equipment until it satisfies the Performance Guarantee; or (b) pay you as liquidated damages in full satisfaction of all your claims arising out of failure to meet the Performance Guarantee, an amount equal to all payments made to us on this contract. If we elect to repair, replace, or modify such unit of Equipment, then the subsequent Performance Tests shall be administered at our expense (unless the failure was not caused by such unit of Equipment) until the Performance Guarantee is satisfied, at which time we shall have no further obligations under this Performance Guarantee as to that unit, and if after such repair, replacement, or modification the unit of Equipment fails to satisfy the Performance Guarantee, then we shall pay you liquidated damages per Clause (b) above. The remedies and obligations set forth in this Performance Guarantee are your exclusive remedies and our exclusive obligations in the event of failure of the Equipment to satisfy the Performance Guarantee.

5. ADWEST MAKES NO GUARANTEES ON ODOR REMOVAL WITHOUT SITE SPECIFIC PROCESS STREAM HYDROCARBON ANALYSIS AND COMPUTER MODELING.

Very truly yours,

ADWEST TECHNOLOGIES, INC.

Richard G. Whitford
Vice President
714-632-9801 x104
714-904-4263 Cell
rwhitford@adwest.cc

EXHIBIT C

South Coast Air Quality Management District
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

NOTICE OF VIOLATION

P 64622

DATE OF VIOLATION		
Month	Day	Year
~~08~~ 01	~~20~~ 30	24

Facility Name		Facility ID	Section
IPS Corporation		800367	LF
Location Address	**City**		**Zip**
17109 S Main Street	Gardena		90248
Mailing Address	**City**		**Zip**
455 W Victoria St.	Compton		90220

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

EACH DAY A VIOLATION OCCURS MAY BE HANDLED AS A SEPARATE OFFENSE REGARDLESS OF WHETHER OR NOT ADDITIONAL NOTICES OF VIOLATION ARE ISSUED.

DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	☑ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	3002 (c)(1)	G10605	6	Failure to operate an RTO with minimum collection and destruction efficiency of 99%.
2	☑ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	3002 (c)(1)	Title V Section K (22)(A)		Failure to report breakdowns as required by Rule 430. - Amended by AR12 on 02/14/25
3	☑ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR	3002 (c)(1)	Title V P10 G10601	8	Failure to maintain a temperature measuring and recording system to continously measure and record the combustion temperature of P10 G10601 equip - Amended by AR12 on 02/14/25
4	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR				
5	☐ SCAQMD ☐ CH&SC ☐ CCR ☐ CFR				

Served To:	Phone	Served By:	Date Notice Served:
Pratap Padalkar	310.898.3353	Avely Gil Rojas	02/13/25
Title	**Email**	**Phone No:**	**Email:**
Director, EH&S	pratap.padalkar @weldon.com	☑ 909-396-2483 ☐ 310-233-	arojas @aqmd.go

*Key to Authority Abbreviations:
SCAQMD – South Coast Air Quality Management District
CH&SC – California Health and Safety Code
CCR – California Code of Regulations
CFR – Code of Federal Regulations

Method of Service: ☑ In Person ☐ Certified M

EXHIBIT D

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Office of Air Quality Planning and Standards
Research Triangle Park, North Carolina 27711

6 JUN 1990

MEMORANDUM

SUBJECT: Performance Test Calculation Guidelines

FROM: William G. Laxton, Director
Technical Support Division, OAQPS (MD-14)

John S. Seitz, Director
Stationary Source Compliance Division, OAQPS (EN-341)

TO: New Source Performance Standards/National Emission Standards for Hazardous Pollutants Compliance Contacts

The following guidelines should be used in calculating and reporting emission rates and concentrations when determining compliance with the new source performance standards (NSPS) and national emission standards for hazardous pollutants (NESHAP). These guidelines can also be used for State implementation plans (SIP's). The areas addressed in this memorandum concern metric and English measurement systems, significant figures (SF's) in the emission standards, SF's to carry in intermediate calculations, and the rounding of final emission value numbers to the proper SF's.

1. **Use only the emission standard in the metric units to determine compliance.**

The policy of using the metric system was established back in the early 1970's. When the Environmental Protection Agency (EPA) proposed standards for seven source categories (38 FR 15406) on June 11, 1973, EPA stated:

> "The Environmental Protection Agency has adopted a policy of expressing standards in the metric rather than English system. Although technical terms in test methods 10 and 11 are expressed in metric units, many of those in test methods 1 through 9 are expressed in English units. Test results derived through calculations in test methods 1 through 9 must be converted to metric units to agree with the form of the proposed standards."

In keeping with this policy, EPA promulgated amendments to Subparts D, E, F, G, and H on June 14, 1974 (39 FR 20790). In the preamble of this rulemaking, EPA stated:

> ".... Also, to be consistent with the Administrator's policy of converting to the metric system, the standards of performance and other numerical entries, which were originally expressed in English

units, are converted to metric units. Some of the numerical entries are rounded after conversion to metric units. It should be noted that the methods in the appendix will be changed to metric units at a later date."

The change to metric units for the test methods were proposed on June 8, 1976 (41 FR 23060) and promulgated on August 18, 1977 (42 FR 41754). Clearly, EPA's intent was to use the metric units to determine compliance.

However, on a practical scale, the use of the metric or the English system of units would not make any difference in determining whether a source is in compliance or out-of-compliance. Only in very rare cases will separate calculations in the metric and in the English systems with the same source test measurement values result in one system showing compliance while the other does not. Therefore, it is not necessary to require source testing firms to submit the results in the metric units on a routine basis. It is suggested that if the value in English units is within 1 percent of the emission standard and if such a difference is of concern in your enforcement strategy, then the value should be converted to metric to determine compliance. The numerical value in English units (in parentheses) are to be considered as close approximations of the metric and should not be used to determine compliance in borderline cases.

2. Consider all emission standards to have at least two SF's, but no more than three SF's.

As a review, an SF is any digit that is necessary to define the specific value or quantity. Zeros may be used either to indicate a specific value, like any other digit, or to indicate the magnitude of a number. Examples are given below:

Ex. 1: 1300 or 1.3×10^3 has two SF's.
Ex. 2: 1300. or 1.300×10^3 has four SF's.
Ex. 3: 1300.0 or 1.3000×10^3 has five SF's.
Ex. 4: 13040 or 1.304×10^4 has four SF's.
Ex. 5: 0.034 or 3.4×10^{-2} has two SF's.
Ex. 6: 0.03400 or 3.400×10^{-2} has four SF's.
Ex. 7: 0.03 or 3×10^{-2} has one SF.

Because the emission standards were not written with consideration to the rules of SF's, especially with the use of zeros, all existing emission standards are considered to have at least two SF's, but no more than three SF's, under this guideline. Thus:

Case 1: 90 mg/dscm (Subpart I) is considered to be 90. (two SF's).
Case 2: 520 ng/J (Subpart Da) is considered to be 520. (three SF's).
Case 3: 0.05 kg/Mg (Subpart S) is considered to be 0.050 (two SF's).
Case 4: 0.1 g/kg (Subpart BB) is considered to be 0.10 (two SF's).

Case 5: 0.005 g/kg (Subpart BB) is considered to be 0.0050 (two SF's).
Case 6: 3870 kg/28 days (Subpart BBB) is considered to have (three SF's).

The above rule differs from the previous guidance given by the predecessor of the Stationary Source Compliance Division. In his August 20, 1980 memorandum to Ms. Louise Jacobs, Director of Enforcement Division of Region VII, Mr. Edward E. Reich, Director of the Division of Stationary Source Enforcement interpreted the emission standards as being absolute, i.e., as having an infinite number of SF's. Using the example of an emission standard of 0.04 gr/dscf, Mr. Reich wrote:

> "As a legal matter, anything greater than 0.04 is a violation (e.g., 0.0401). However, since the third digit was not established, most engineers in reporting results would tend to round off and therefore 0.044 would be reported as 0.04 and 0.045 would be reported as 0.05. A better guide would be that anything showing greater than a ten percent excess is worth considering for enforcement action."

Although the new guidance appears to be a major shift in Agency policy, it is not, because only very limited cases, if any, would be involved. For example, if the emission standard is 90 mg/dscm, 90.0000001 mg/dscm would be in violation according to the August 20, 1980 guidance. However, such an occurrence would be highly unlikely. (Note also that strict adherence to an infinite number of SF's would require an infinite number of SF's in conversion factors, which is a practice that is impossible to follow.) Therefore, the effect of the change to two or three SF's in the emission standards would be practically no different from the initial guidance.

3. Carry at least five significant digits in intermediate calculations.

Since the measurement of variables and sample quantities during source performance tests are recorded in metric or English units or a combination of both, specifying specific rules to handle SF's in addition, subtraction, multiplication, and division would become cumbersome. To keep things on a practical basis for emission standards with two or three SF's, English or metric may be used provided that at least five SF's are retained (most calculators retain nine digits) in all intermediate calculations. The final calculation after averaging all the runs should produce the metric units, if necessary. Then the final number should be rounded off as described below to determine compliance.

4. Round off calculated emission numbers to the number of SF's determined by the rule stated in (2) above.

When rounding off a figure, the following procedure, based on practices given under the American Society for Testing and Materials (ASTM) (Standard for Metric Practice E 380), should be used: If the first digit to be discarded is less than five, the last digit retained should not be changed. When the first digit discarded is greater than five, or if it is a five

followed by at least one digit other than 0, the last figure retained should be increased by one unit. When the first digit discarded is exactly five, followed only by zeros, the last digit retained should be rounded upward if it is an odd number, but no adjustment made if it is an even number.

For example, if the emission standard is 90, then 90.357 would be rounded to 90, 90.639 would be rounded to 91, 90.500 would be rounded to 90, and 91.500 would be rounded to 92.

Consideration was given to round upward when the last digit to be discarded is five; however, because the occurrence of the first digit to be discarded being exactly five followed by zeros is rare, it was decided to be consistent with the ASTM practice.

cc: Jack R. Farmer, ESD (MD-13)
John Calcagni, AQMD (MD-15)
J.E. McCarley, EMB (MD-14)
Rodney M. Midgett, QAD (MD-77A)
Louis R. Paley, SSCD (EN-341)
Ron Shafer, SSCD (EN-341)
Roger T. Shigehara, EMB (MD-19)
John J. Silvasi, AQMD (MD-15)
Gilbert H. Wood, EMB (MD-14)
Susan R. Wyatt, CPB (MD-13)