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

PETITIONER: BECKER SPECIALTY CORP.	CASE NO: 6275-1
	FACILITY ID: 176339
FACILITY ADDRESS: <u>15310 Arrow Route</u> location of equipment/site of violation; specify bus	iness/corporate address, if different, under Item 2, below]
ity, State, Zip <u>: Fontana, CA 92335</u>	
. TYPE OF VARIANCE REQUESTED (more than selecting)  ☐ INTERIM SHORT ☐ REGULAR	n one box may be checked; see Attachment A, Item 1, before  EMERGENCY EX PARTE EMERGENCY
. <u>CONTACT</u> : Name, title, company (if differer authorized to receive notices regarding this Peti	nt than Petitioner), address, and phone number of persons ition (no more than two authorized persons).
Garry Stacey	Bruce Armbruster
Site Manager	Directing Consultant, ALL4 Environmental CA, LLC
15310 Arrow Route	12505 North Maintsreet, Suite 212
Fontana, CA Zip 92335	Rancho Cucamonga, CA Zip 91739
<b>☎</b> ( 909 ) 202-4623	<b>☎</b> ( 909 ) 477-7103
Fax_()	
E-mail_Garry.Stacey@Beckers-group.com	E-mail_barmbruster@all4inc.com
. RECLAIM Permit 🗌 Yes 🔀 No	Title V Permit 🛛 Yes 🔲 No
Persons with disabilities may request this	document in an alternative format by contacting

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

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

Becker Specialty Corp. (Becker) utilizes a catalytic oxidizer to control emissions of volatile organic compounds (VOCs) generated during metal coating manufacturing operations. On July 18, 2025, the actuator motor that controls the air intake to the oxidizer unexpectedly failed, causing the oxidizer's automatic safety system to shut it down to prevent unsafe and unpermitted operations. The oxidizer is regularly maintained in accordance with a scheduled inspection program, and the failure of the actuator motor occurred unexpectedly despite these preventative measures.

At the time of the oxidizer failure, no coating production operations requiring use of the oxidizer were occurring, and no VOC-emitting processes were active. As a result, the failure did not trigger a reportable "breakdown" event under SCAQMD Rule 430, nor were any VOC emissions from the large batch coating manufacturing process released into the atmosphere due to the shutdown.

Upon discovering the failure, Becker immediately took action to address it. A third-party technician attempted to repair the motor; however, it was determined that the motor requires complete replacement. Becker initially attempted to expedite an order for the new motor. However, Becker was informed that the actuator motor was not an off-the-shelf item and must be fabricated for this specific use.

Due to the unanticipated, extended time period required to fabricate the actuator motor, the replacement motor is not expected to be delivered until after August 8, 2025, at the earliest, and will require additional time to install and confirm safe operation. Without the actuator motor, the oxidizer cannot be returned to normal operating condition. Upon learning of the extended lead time required to obtain and install the new actuator motor, the facility began to take steps to prepare and file this Ex Parte Emergency Variance Petition.

To minimize potential emissions and continue limited operations in compliance with permit conditions, Becker immediately suspended use of all large batch mixers vented to the oxidizer. As a mitigation measure, where feasible, Becker attempted to shift production to small batch mixing equipment that is exempt under SCAQMD Rule 219(d)(11)(A). While this shift in production allowed Becker to sustain a limited level of production without triggering permit violations or releasing excess VOCs, the extended period over which these good-faith efforts have now been in place have put Becker at risk of significant economic harm. Without the ability to operate large batch mixing equipment, Becker will not be able to fulfill existing contracts, jeopardizing existing client relationships, related revenue and employment, and risking permanent business loss.

For these reasons, Becker respectfully requests the issuance of an Emergency Variance to temporarily allow the operation of large batch mixers without control by the oxidizer until the custom-fabricated actuator motor is delivered and installed. The broken actuator motor was entirely unexpected and occurred in spite of Becker's robust inspection and maintenance schedule for the oxidizer. Becker has exercised all reasonable diligence to comply with applicable rules and has taken effective steps to minimize emissions and maintain public health protection (including shifting some operations to small batch mixing equipment exempt from permitting requirements). Further, Becker expeditiously began preparing this Ex Parte Emergency Variance Petition after learning that the oxidizer may not be operational for a significantly longer duration than originally anticipated. Becker submits that granting this Emergency Variance is necessary to prevent unreasonable economic hardship, will not result in a public nuisance, and is consistent with the public interest in supporting continued operation of local manufacturing without significant environmental harm. Granting Becker's petition also will not result in excess emissions, because the operation of the large batch mixers without the thermal oxidizer for the duration of the Emergency Variance is not expected to result in an exceedance of the facility-wide VOC limit applicable to the affected equipment.

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

Becker manufactures high-performance coil coatings for metal application. The operations involve pigment dispersion and resin mixing using six mixing tanks and the use of a catalytic oxidizer to reduce emissions from mixing operations.

The Facility may operate 24 hours per day, seven days per week, 52 weeks per year. On average, the Facility handles approximately 24 batches per day, with a maximum capacity of six batches per hour depending on production demands. An average batch is 55 gallons, but it can be as small as one gallon or as large as 550 gallons.

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

Equipment/Activity	Application/ Permit No.	RECLAIM Device No.	Date Application/Plan Denied (if relevant)*
Mixing System, No. M7	558675	G30682	
Mixing System, No. M5	558676	G30683	
Mixing System, No. M6	558667	G30678	
Mixing System, No. M4	558662	G30673	
Mixing System, No. M8	558663	G30674	
Mixing System, No. M10	559946	G44158	
Catalytic oxidizer	558680	G30685	

<sup>\*</sup>Attach copy of denial letter

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

Becker produces specialty coatings using the referenced mixing systems, each consisting of an electrically driven mixer capable of mixing coating products from 55 gallons in size up to 550 gallons. Raw materials are added to a mixing tank and placed under the mixer. Small amounts of VOC emissions are generated during this mixing process due to evaporation from VOC contained in the raw materials being mixed. The mixing tank is covered during mixing to minimize the generation and release of VOC emissions in accordance with SCAQMD Rule 1141.1 Coating and Ink Manufacturing. Generated VOC emissions are captured via a collection duct on the cover placed over the mixing tank during operation and vented to the oxidizer to further reduce VOC emissions released to the atmosphere.

Without the ability to mix the raw materials, finished products cannot be produced. The finished products are specialty products custom made on demand for each client's needs. Orders are received from clients on an asneeded basis. Failure to produce the desired finished product will result in the client not being able to provide their client with the needed product.

8.	Is there a regular maintenance and/or inspection schedule for this equipment?	Yes 🛚	No 🗌	
	If yes, how often: Annually, quarterly, monthly and weekly			
	Date of last maintenance and/or inspection July 14, 2025			
	Describe the maintenance and/or inspection that was performed.			

The facility has implemented a preventive maintenance program intended to ensure proper maintenance and operation of the oxidizer. The program includes various periodic inspections (daily, weekly, monthly, and annual) and checks. The procedure includes, but is not limited to, visual checks of the burners, gas valves, natural gas pressure gauges, gas train, combustion blower, ducts, flame, and related equipment to ensure that the oxidizer is operating properly. Because the thermal oxidizer air intake flue actuator motor is an enclosed component, Becker does not have the capability to inspect or repair internal motor components, and the servicing vendor determined the motor could not be serviced or repaired on site but must be entirely replaced. Therefore, its failure could not have been reasonably predicted or prevented.

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

Rule	Explanation
Condition 3 on permits G30682 G30683 G30678 G30673 G30674 G44158	The six mixers have the same operating conditions. The condition states "This equipment shall not be operated unless it is vented to air pollution control system which has been issued a valid permit by the South Coast AQMD". The mixers are vented to the oxidizer during normal operation. Due to the breakdown of the oxidizer, the mixing tanks will not vent to an operating APCD.
Conditions 1 and 2 on permit G30685	The oxidizer associated with permit G30685 will not be in operation during the variance. Conditions 1 and 2 require that the equipment be operated in accordance with all data and specifications submitted with the application under which the permit was issued, and that the equipment be properly maintained and kept in good operating condition at all times, respectively. Due to the failure of the actuator motor the oxidizer cannot operate.
Rule 203(b)	Rule 203(b) requires that equipment not be operated contrary to the conditions specified in the permit to operate. Existing permit conditions require that the operation of the equipment be conducted in accordance with all data and specifications submitted with the application under which the permit has been issued. Furthermore, existing permit conditions require the large batch mixers to be vented to an air pollution control device when in operation.
Rule 3002(c)(1)	A facility must operate a Title V facility, and all equipment located at a Title V facility in compliance with all terms, requirements, and conditions specified in the Title V permit at all times. As stated above, the Facility is seeking variance relief from a Title V condition.

10.	Are the equipment or activities subject to this request currently under variance coverage? Yes \( \subseteq \) No \( \subseteq \)
	Case No. Date of Action Final Compliance Explanation Date
	·
11.	Are any other equipment or activities at this location currently (or within the last six months) under variance coverage? Yes \( \sumsymbol{\subset} \) No \( \subseteq \)
	Case No. Date of Action Final Compliance Explanation Date
12.	Were you issued any Notice(s) of Violation or Notice(s) to Comply concerning this equipment or activity within the past year?  Yes  No
	If yes, you must attach a copy of each notice.
13.	Have you received any complaints from the public regarding the operation of the subject equipment or activity within the last six months? Yes No
	If yes, you should be prepared to present details at the hearing.
14.	Explain why it is beyond your reasonable control to comply with the rule(s) and/or permit condition(s). Provide specific event(s) and date(s) of occurrence(s), if applicable.
	The actuator motor is an integral component to the oxidizer. The actuator motor controls the louvres for the fresh air inlet to the oxidizer used for the combustion of natural gas and the safe operation of the oxidizer.
	The oxidizer is equipped with an automated safety system that prevents the oxidizer from operating unless all monitored components are operational. The flow of incoming air and natural gas combustion are monitored components. It is not possible to bypass this safety feature, and the oxidizer cannot be used in this state. The repair technician found the actuator motor to be unrepairable. A replacement actuator motor could not be located locally or from known suppliers. The manufacturer was contacted, and a new unit was ordered; however, because the motor must be custom manufactured, the time period during which the thermal oxidizer has been non-operational has extended beyond initial expectations.
	Becker has arranged for the repair technician to install the new actuator motor once it is received from the manufacturer.
TYOU M	MAY ATTACH ADDITIONAL PAGES IF NECESSARY] PAGE 5 OF 12

[YOU MAY ATTACH ADDITIONAL PAGES IF NECESSARY]

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

The oxidizer is equipped with a visual notification system that indicates if the oxidizer is in operation. This oxidizer is located outdoors and the visual system is located indoors where workers can easily see the status of the oxidizer. The indicator was found to be showing as non-operational on the morning of July 18<sup>th</sup>.

The oxidizer was checked and confirmed to be not in operation. It was then found that the oxidizer had shut down due to a failed component. A repair technician was called and an inspection of the oxidizer was performed on July 19<sup>th</sup>. The faulty component was identified by the technician as the actuator motor to the fresh air inlet louvres. The actuator motor was found to be not repairable. A replacement actuator motor could not be found and the manufacturer was contacted. A replacement actuator motor must be assembled and will require several weeks before it can be shipped.

The replacement actuator motor was ordered on July 21st. The replacement actuator motor is expected to be received, installed, and operational by August 22nd.

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

There are no additional steps Becker can take to achieve compliance. The oxidizer cannot be operated without the replacement actuator motor.

The shutdown of the oxidizer meets the Rule 102 definition of a breakdown. However, because the mixers that vent to the oxidizer were not in operation when the oxidizer shut down as a result of the actuator motor failure, because no VOC emissions were released into the atmosphere when the oxidizer shut down, and because the large batch mixers vented to the thermal oxidizer have not been operated since the actuator motor failure, the actuator motor failure did not result in a violation of any SCAQMD rules or permit conditions requiring notification in accordance with Rule 430. Therefore, SCAQMD was not contacted about this condition.

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

Economic losses: \$	\$7,000,000	
Number of employee	s laid off (if any):9	

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

As a primary supplier of specialized coatings, Becker's Fontana location serves key companies responsible for the application of the coatings manufactured at the facility to high-value components. Without this supply, the coater's operations would be immediately disrupted, leading to production stoppages and revenue losses that extend far beyond those that would be experienced by Becker alone. Consequently, the parts manufacturer relying on these coated components would be unable to fulfill contractual obligations to their customers, risking long-term loss of business to out-of-state competitors and resulting in potential layoffs. Moreover, delays at the manufacturing level would directly impact contractors waiting to install these components at active construction sites, causing project delays, possible penalties, and potential cancellations. This domino effect would ripple

an isolated event—it is a critical threa businesses.	job stability across multiple tt to the regional economy	e industries. The clo and the viability of i	osure of this site would no multiple California-based
Can you curtail or terminate operation	ns in lieu of, or in addition	n to, obtaining a variance? Please explain.	
Becker is able to produce small bate not feasible to produce larger orders different from each other. Use of the larger batches that are required to n	s using these small mixers e larger permitted mixers is	as the finished bate required to allow F	ches could be slightly Secker to produce consiste
Estimate excess emissions, if any, on total opacity above 20% during the va	a daily basis, including, if triance period). If the varia	applicable, excess ance will result in no	opacity (the percentage of excess emissions, insert
	(A)	(B)	(C)*
Pollutant	Total Estimated Excess Emissions (lbs/day)	Reduction Due	
voc	0	0	0
* Column A minus Column B = Column Excess Opacity: %	n C		•
Show calculations used to estimate quemissions.	antities in No. 19, or expla	ain why there will be	e no excess
No excess emissions are anticipated maintain compliance with the existing	because Becker will mana facility-wide VOC emission	age the large batch on limit of 61 pound	mixing operation to s per day.
Explain how you plan to reduce (mitiga feasible, or why reductions are not fea	ate) excess emissions duri	ng the variance per	iod to the maximum exter

RECLAIM facilities from applicable missing data requirements.	
Becker currently records the amount of materials used in the mixers on a daily basis. This will during the variance period.	not change
nelude 3	a detailed
How do you intend to achieve compliance with the rule(s) and/or permit condition(s)? Include a description of any equipment to be installed, modifications or process changes to be made, per to be amended, etc., dates by which the actions will be completed, and an estimate of total cost	
Compliance will be achieved by replacing the faulty actuator motor, which will allow the oxidiz operation.	er to resume
State the date you are requesting the variance to begin; August 4, 2025	; and the
State the date you are requesting the variance to begin: August 4, 2025 date by which you expect to achieve final compliance: August 22, 2025	ents of Progre
State the date you are requesting the variance to begin: August 4, 2025 date by which you expect to achieve final compliance: August 22, 2025	ents of Progre
State the date you are requesting the variance to begin: August 4, 2025 date by which you expect to achieve final compliance: August 22, 2025  If the regular variance is to extend beyond one year, you must include a Schedule of Increments for steps needed to achieve compliance. See District Rule	ents of Progre
State the date you are requesting the variance to begin: August 4, 2025 date by which you expect to achieve final compliance: August 22, 2025  If the regular variance is to extend beyond one year, you must include a Schedule of Increm specifying dates or time increments for steps needed to achieve compliance. See District Rul of Increments of Progress (see Attachment A, Item 24, Example #3).	ents of Progre
State the date you are requesting the variance to begin: August 4, 2025 date by which you expect to achieve final compliance: August 22, 2025  If the regular variance is to extend beyond one year, you must include a Schedule of Increm specifying dates or time increments for steps needed to achieve compliance. See District Rul of Increments of Progress (see Attachment A, Item 24, Example #3).	ents of Progre
State the date you are requesting the variance to begin: August 4, 2025 date by which you expect to achieve final compliance: August 22, 2025  If the regular variance is to extend beyond one year, you must include a Schedule of Increm specifying dates or time increments for steps needed to achieve compliance. See District Rul of Increments of Progress (see Attachment A, Item 24, Example #3).	ents of Progre
State the date you are requesting the variance to begin: August 4, 2025 date by which you expect to achieve final compliance: August 22, 2025  If the regular variance is to extend beyond one year, you must include a Schedule of Increm specifying dates or time increments for steps needed to achieve compliance. See District Rul of Increments of Progress (see Attachment A, Item 24, Example #3).	ents of Progre e 102 for defini
State the date you are requesting the variance to begin: August 4, 2025 date by which you expect to achieve final compliance: August 22, 2025  If the regular variance is to extend beyond one year, you must include a Schedule of Increm specifying dates or time increments for steps needed to achieve compliance. See District Rul of Increments of Progress (see Attachment A, Item 24, Example #3).  List Increments of Progress here:	ents of Progre e 102 for defini

ii the petition was con	ipleted by someone other than the	petitioner, please provide their name and title below.
Name	Company	Title
The undersigned, und therein set forth, is tru	er penalty of perjury, states that the e and correct.	above petition, including attachments and the items
Executed on	at	Garry Stacey
Signature	F	rint Name
Title: Site M	anager	<u> </u>
26. SMALL BUSINESS an individuals, or entities meeting	d TABLE III SCHEDULE A FEES:	To be eligible for reduced fees for small businesses, ion [see District Rule 303(h)], you must complete the
following:	Declaration Re Reduce	
1. The petitioner is		arec Engionity
a)	rtner or owner of the petitioner herei make the representations set forth	n, or a duly authorized agent of the petitioner herein.
If you selected 1a, a	ibove, skip item 2.	
SMALL BUSINI following criteria; these criteria; (a) the (b) the	ESS means a business which is ind	0,000 or less <b>or</b>
b) 🗌 an entity with	total gross annual receipts of \$500,	000 or less.
3. Therefore, I believe to fee calculations, in	he petitioner qualifies for reduced f accordance with Rule 303(h).	ees for purpose of filing fees and excess emission
I declare under penalty	of perjury that the foregoing is true	and correct.
Executed on	, at	, California
Signature	Pri	nt Name
Title		
		•
YOU MAY ATTACH ADDITIONAL PA	GES IF NECESSARY	PAGE 9 OF 12



Title Page Facility ID: Revision #:

176339 Date: February 06, 2025

### FACILITY PERMIT TO OPERATE

### BECKER SPECIALTY CORP. 15310 ARROW ROUTE FONTANA, CA 92335

#### NOTICE

IN ACCORDANCE WITH RULE 206, THIS PERMIT TO OPERATE OR A COPY THEREOF MUST BE KEPT AT THE LOCATION FOR WHICH IT IS ISSUED.

THIS PERMIT DOES NOT AUTHORIZE THE EMISSION OF AIR CONTAMINANTS IN EXCESS AND SAFETY CODE OF THE OF THOSE ALLOWED BY DIVISION 26 OF THE HEALTH STATE OF CALIFORNIA OR THE RULES OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT. THIS PERMIT SHALL NOT BE CONSTRUED AS PERMISSION TO VIOLATE EXISTING LAWS, ORDINANCES, REGULATIONS OR STATUTES OF ANY OTHER FEDERAL, STATE OR LOCAL GOVERNMENTAL AGENCIES.

> Wayne Nastri Executive Officer

By Shannon Lee for Jason Aspell

Deputy Executive Officer Engineering and Permitting



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# FACILITY PERMIT TO OPERATE BECKER SPECIALTY CORP.

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Revision #: 2
Date: February 06, 2025

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# FACILITY PERMIT TO OPERATE BECKER SPECIALTY CORP.

### SECTION A: FACILITY INFORMATION

LEGAL OWNER &/OR OPERATOR:

BECKER SPECIALTY CORP.

LEGAL OPERATOR (if different than owner):

**EQUIPMENT LOCATION:** 

15310 ARROW ROUTE

FONTANA, CA 92335

MAILING ADDRESS:

15310 ARROW ROUTE

FONTANA, CA 92335

RESPONSIBLE OFFICIAL:

GARRY STACEY

TITLE:

SITE MANAGER

TELEPHONE NUMBER:

(909) 202-4623

**CONTACT PERSON:** 

PAULA JONES

TITLE:

SENIOR CHEMIST

TELEPHONE NUMBER:

(909) 356-0854

TITLE V PERMIT ISSUED:

February 06, 2025

TITLE V PERMIT EXPIRATION DATE:

February 05, 2030

TITLE V	RECLAIM	
YES	NOx:	NO
	SOx:	NO
	CYCLE:	0
	ZONE:	INLAND



Section B Page: I Facility ID: 176339
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# FACILITY PERMIT TO OPERATE BECKER SPECIALTY CORP.

### SECTION B: RECLAIM ANNUAL EMISSION ALLOCATION

NOT APPLICABLE



Section C Page: 1 Facility ID: 176339 Revision #: 2 Date: February 06, 2025

### FACILITY PERMIT TO OPERATE BECKER SPECIALTY CORP.

SECTION C: FACILITY PLOT PLAN

(TO BE DEVELOPED)



Section D Page 1 Facility I.D.#; 176339 Revision #: 2

Date. February 06, 2025

# FACILITY PERMIT TO OPERATE BECKER SPECIALTY CORP.

# Facility Equipment and Requirements (Section D)

This section consists of a table listing all permitted equipment at the facility, facility wide requirements, all individual Permits to Construct and Permits to Operate issued to various equipment at the facility, and Rule 219-exempt equipment subject to source-specific requirements. Each permit and Rule 219-exempt equipment will list operating conditions including periodic monitoring requirements, and applicable emission limits and requirements that the equipment is subject to. Also included is the rule origin and authority of each emission limit and permit condition.



Section D Page 2 Facility I.D.#: 176339 Revision #: 2

Date: February 06, 2025

### FACILITY PERMIT TO OPERATE BECKER SPECIALTY CORP.

### PERMITTED EQUIPMENT LIST

THE FOLLOWING IS A LIST OF ALL PERMITS TO CONSTRUCT AND PERMITS TO OPERATE AT THIS FACILITY:

Application number	Permit to Operate number	Equipment description
558675	G30682	Mixing System, No. M7
558676	G30683	Mixing System, No. M5
558667	G30678	Mixing System, No. M6
558662	G30673	Mixing System, No. M4
558663	G30674	Mixing System, No. M8
559946	G44158	Mixing System, No. M10
558680	G30685	Catalytic Oxidizer

NOTE: Equipment listed above that have no corresponding Permits to Operate number are issued Permits to Construct. The issuance or denial of their Permits to Operate is subject to Engineering final review. Any other applications that are still being processed and have not been issued Permits to Construct or Permits to Operate will not be found in this Title V permit.



Section D Page 3 Facility I.D.#: 176339 Revision #: 2

Date. February 06, 2025

### FACILITY PERMIT TO OPERATE BECKER SPECIALTY CORP.

### FACILITY WIDE CONDITION(S)

#### Condition(s):

- 1. Except for open abrasive blasting operations, the operator shall not discharge into the atmosphere from any single source of emissions whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is:
  - As dark or darker in shade as that designated No. 1 on the Ringelmann chart, as published by the United States Bureau of Mines; or
  - b. Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subparagraph (a) of this condition.
     [Rule 401]
- The total quantity of Volatile Organic Compounds (VOC) emissions to the atmosphere from this facility shall not exceed 61 pounds in any one day. For equipment that is vented to air pollution control (APC) equipment, the VOC emissions shall be calculated using the required overall control efficiency specified in the permit(s) for the APC equipment.
  [Rule 109, 1303(b)(2)-Offset]
- In addition to the record keeping requirements in Rule 109, the operator shall keep adequate records of daily VOC emissions from this facility, in pounds.

  [Rule 109, 1303(b)(2)-Offset]
- 4. The total quantity of Hazardous Air Pollutant (HAP) emissions from this facility shall not exceed 1,666 pounds of a single HAP or 4,166 pounds of a combination of HAPs in any calendar month. To ensure compliance with the monthly emission caps of this condition, the facility operator shall:
  - (a) In addition to the recordkeeping requirements of Rule 109, keep adequate records for this facility to verify the daily and monthly HAP emissions in pounds and the HAP content of each material as applied (including water and exempt compounds).
  - (b) Within 14 calendar days after the end of each month, total and record HAP emissions for the month from all equipment and operations that are required to have written permits or are exempt from written permits pursuant to Rule 219. The record shall include any procedures used to account for control device efficiencies and/or waste disposal. It shall be signed and certified for accuracy by the highest ranking individual responsible for compliance with South Coast AQMD rules.
  - (c) Maintain a single list which includes only the name and address of each person from whom the facility acquired HAP-containing material regulated by the South Coast AQMD that was used or stored at the facility during the preceding 12 months.
  - (d) Retain all purchase invoices for all HAP-containing material used or stored at the facility, and all waste manifests for all waste HAP-containing material removed from the facility, for five years.

    [40CFR63 Subpart HHHHHH]
- 5. All records shall be prepared in a format which is acceptable to the South Coast AQMD, shall be retained on the premises for at least five years, and shall be made available to the South Coast AQMD personnel upon request. [Rule 109, 1303(b)(2)-Offset]



Section D Facility I.D.#: Page 4 176339

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### FACILITY PERMIT TO OPERATE BECKER SPECIALTY CORP.

 Safety data sheets for all materials used at this facility shall be kept current and made available to South Coast AQMD personnel upon request.
 [Rule 109, 1303(b)(2)-Offset]

This facility is subject to the applicable requirements of the following rules or regulation(s):

The operator shall operate all afterburners at this facility in compliance with all data and specifications submitted with the Rule 480 Compliance Plan application.

Whenever a natural gas shortage or curtailment occurs, all afterburners in operation shall be shut down. The operator shall not start-up and/or operate the afterburners and equipment generating the emissions until the natural gas shortage or curtailment has ended.

The operator shall keep records of all dates and durations of any natural gas shortage or curtailment and the action taken during each natural gas shortage or curtailment. The records shall be prepared in a format which is acceptable to the South Coast AQMD, retained on the premises for at least five years and made available to South Coast AQMD personnel upon request.

[Rule 480]



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Date. February 86, 2025

### FACILITY PERMIT TO OPERATE BECKER SPECIALTY CORP.

#### PERMIT TO OPERATE

Permit No..G30682 A/N 558675

#### **Equipment Description:**

Mixing System No. M7 Consisting of:

- Mixer, M7, Schold, Model No. 7106-88, 20-H.P. Motor.
- 2. Mixing Tanks, Portable, 100-550 Gallon Capacity.

#### Conditions:

- 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 system which has been issued a valid permit by the South Coast AQMD.

  [Rule 1303(a)(1)-BACT, 1303(b)(2)-Offset]
- 4. The operator shall keep adequate records to verify daily usage. Such records shall be prepared in a format which is acceptable to the South Coast AQMD, shall be retained at the premises for a period of five years and shall be made available to the South Coast AQMD personnel upon request.
  [Rule 1303(b)(2)-Offset]

#### Periodic Monitoring:

- 5. The operator shall keep records, in a manner approved by the South Coast AQMD, for the cleaning log that includes statement of the approved cleaning method.

  [Rule 3004(a)(4)]
- 6. 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 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, and either:

- 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
- b. Have a CARB-certified smoke reader determine compliance with the opacity standard, using EPA Method 9



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# FACILITY PERMIT TO OPERATE BECKER SPECIALTY CORP.

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)]

#### **Emissions and Requirements:**

7. This equipment is subject to the applicable requirements of the following Rules and Regulations:

VOC: Rule 109

VOC: Rule 1141.1

VOC: Rule 1171, see Appendix B for emission limits PM: Rule 405, see Appendix B for emission limits

HAP(s): 40CFR63 Subpart CCCCCC, see Section J for requirements



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## FACILITY PERMIT TO OPERATE BECKER SPECIALTY CORP.

#### PERMIT TO OPERATE

Permit No. G30683 A/N 558676

#### Equipment Description:

Mixing System No. M5 Consisting of:

- 1. Mixer, M5, Schold, Serial No. 6776-85, 20- H.P. Motor.
- 2. Mixing Tanks, Portable, 100-550 Gallons Capacity.

#### Conditions:

- 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]
- This equipment shall be properly maintained and kept in good operating condition at all times. [Rule 204]
- This equipment shall not be operated unless it is vented to air pollution control system which has been issued a valid permit by the Executive Officer.
  [Rule 1303(a)(1)-BACT, 1303(b)(2)-Offset]
- 4. The operator shall keep adequate records to verify daily usage. Such records shall be prepared in a format which is acceptable to the South Coast AQMD, shall be retained at the premises for a period of five years and shall be made available to the South Coast AQMD personnel upon request.
  [Rule 1303(b)(2)-Offset]

#### Periodic Monitoring:

- 5. The operator shall keep records, in a manner approved by the South Coast AQMD, for the cleaning log that includes statement of the approved cleaning method.

  [Rule 3004(a)(4)]
- 6. 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 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, and either:
  - 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;
  - b. Have a CARB-certified smoke reader determine compliance with the opacity standard, using EPA Method 9



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# FACILITY PERMIT TO OPERATE BECKER SPECIALTY CORP.

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)]

#### **Emissions and Requirements:**

7. This equipment is subject to the applicable requirements of the following Rules and Regulations:

VOC: Rule 109 VOC: Rule 1141.I

VOC: Rule 1171, see Appendix B for emission limits PM: Rule 405, see Appendix B for emission limits

HAP(s): 40CFR63 Subpart CCCCCC, see Section J for requirements



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### FACILITY PERMIT TO OPERATE BECKER SPECIALTY CORP

#### PERMIT TO OPERATE

Permit No. G30678 A/N 558667

#### **Equipment Description:**

Mixing System No. M6 Consisting of:

- 1. Mixer, M6, Schold, Serial No. 7105-88, 20- H.P. Motor.
- 2. Mixing Tanks, Portable, 100-550 Gallons Capacity

#### Conditions:

- 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]
- This equipment shall be properly maintained and kept in good operating condition at all times. [Rule 204]
- This equipment shall not be operated unless it is vented to air pollution control system which has been issued a valid permit by the Executive Officer.

  [Rule 1303(a)(1)-BACT, 1303(b)(2)-Offset]
- 4. The operator shall keep adequate records to verify daily usage. Such records shall be prepared in a format which is acceptable to the South Coast AQMD, shall be retained at the premises for a period of five years and shall be made available to the South Coast AQMD personnel upon request.

  [Rule 1303(b)(2)-Offset]

#### Periodic Monitoring:

- 5. The operator shall keep records, in a manner approved by the South Coast AQMD, for the cleaning log that includes statement of the approved cleaning method.

  [Rule 3004(a)(4)]
- 6. 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 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, and either:

- a. 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
- b. Have a CARB-certified smoke reader determine compliance with the opacity standard, using EPA Method 9



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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)]

#### Emissions and Requirements:

This equipment is subject to the applicable requirements of the following Rules and Regulations:

VOC: Rule 109 VOC: Rule 1141.1

VOC: Rule 1171, see Appendix B for emission limits PM: Rule 405, see Appendix B for emission limits

HAP(s): 40CFR63 Subpart CCCCCC, see Section J for requirements



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### FACILITY PERMIT TO OPERATE BECKER SPECIALTY CORP.

#### PERMIT TO OPERATE

Permit No. G30673 A/N 558662

#### Equipment Description:

Mixing System No. M4 Consisting of:

- Mixer, M4, Schold, Serial No. 6797-85, 20-H.P. Motor.
- 2. Mixing Tanks, Portable, 150-550 Gallon Capacity.

#### Conditions:

- 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]
- 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 system which has been issued a valid permit by the South Coast AQMD.

  [Rule 1303(a)(1)-BACT, 1303(b)(2)-Offset]
- 4. The operator shall keep adequate records to verify daily usage. Such records shall be prepared in a format which is acceptable to the South Coast AQMD, shall be retained at the premises for a period of five years and shall be made available to the South Coast AQMD personnel upon request. [Rule 1303(b)(2)-Offset]

#### Periodic Monitoring:

- 5. The operator shall keep records, in a manner approved by the South Coast AQMD, for the cleaning log that includes statement of the approved cleaning method.

  [Rule 3004(a)(4)]
- 6. 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 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, and either:
  - 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
  - b. Have a CARB-certified smoke reader determine compliance with the opacity standard, using EPA Method 9



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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:

- 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)]

#### Emissions and Requirements:

This equipment is subject to the applicable requirements of the following Rules and Regulations: 7.

**Rule 109** VOC: VOC: Rule 1141.1

Rule 1171, see Appendix B for emission limits VOC: Rule 405, see Appendix B for emission limits PM:

HAP(s): 40CFR63 Subpart CCCCCC, see Section J for requirements



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#### FACILITY PERMIT TO OPERATE BECKER SPECIALTY CORP.

#### PERMIT TO OPERATE

Permit No. G30674 A/N 558663

#### Equipment Description:

Mixing System No. M8 Consisting of:

- 1. Mixer, M8, Schold, Serial No. 766297, 20-H.P. Motor.
- 2. Mixing Tanks, Portable, 150-550 Galion Capacity.

#### Conditions:

- 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]
- This equipment shall be properly maintained and kept in good operating condition at all times.
   [Rule 204]
- This equipment shall not be operated unless it is vented to air pollution control system which has been issued a valid permit by the Executive Officer.
   [Rule 1303(a)(1)-BACT, 1303(b)(2)-Offset]
- 4. The operator shall keep adequate records to verify daily usage. Such records shall be prepared in a format which is acceptable to the South Coast AQMD, shall be retained at the premises for a period of five years and shall be made available to the South Coast AQMD personnel upon request.
  [Rule 1303(b)(2)-Offset]

#### Periodic Monitoring:

- 5. The operator shall keep records, in a manner approved by the South Coast AQMD, for the cleaning log that includes statement of the approved cleaning method.

  [Rule 3004(a)(4)]
- 6. 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 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, and either:
  - 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
  - b. Have a CARB-certified smoke reader determine compliance with the opacity standard, using EPA Method 9



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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)]

#### Emissions and Requirements:

7. This equipment is subject to the applicable requirements of the following Rules and Regulations:

VOC: Rule 109

VOC: Rule 1141.1

VOC: Rule 1171, see Appendix B for emission limits PM: Rule 405, see Appendix B for emission limits

HAP(s): 40CFR63 Subpart CCCCCC, see Section J for requirements



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### FACILITY PERMIT TO OPERATE BECKER SPECIALTY CORP.

#### PERMIT TO OPERATE

Permit No. G44158 A/N 559946

#### **Equipment Description:**

Mixing System No. M10 Consisting of:

- 1. Mixer, M10, Schold, Serial No. 766397, 20-H.P. Motor.
- Mixing Tanks, Portable, 150-550 Gallon Capacity.

#### Conditions:

- 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 2041
- 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 system which has been issued a valid permit by the South Coast AQMD.

  [Rule 1303(a)(1)-BACT, 1303(b)(2)-Offset]
- 4. The operator shall keep adequate records to verify daily usage. Such records shall be prepared in a format which is acceptable to the South Coast AQMD, shall be retained at the premises for a period of five years and shall be made available to the South Coast AQMD personnel upon request, [Rule 1303(b)(2)-Offset]

#### Periodic Monitoring:

- 5. The operator shall keep records, in a manner approved by the South Coast AQMD, for the cleaning log that includes statement of the approved cleaning method.

  [Rule 3004(a)(4)]
- 6. 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 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, and either:
  - 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
  - b. Have a CARB-certified smoke reader determine compliance with the opacity standard, using EPA Method 9



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# FACILITY PERMIT TO OPERATE BECKER SPECIALTY CORP.

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)]

#### **Emissions and Requirements:**

7. This equipment is subject to the applicable requirements of the following Rules and Regulations:

VOC: Rule 109 VOC: Rule 1141.1

VOC: Rule 1171, see Appendix B for emission limits PM: Rule 405, see Appendix B for emission limits

HAP(s): 40CFR63 Subpart CCCCCCC, see Section J for requirements



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FACILITY PERMIT TO OPERATE BECKER SPECIALTY CORP.

#### PERMIT TO OPERATE

Permit No. G30685 A/N 558680

#### **Equipment Description:**

Air Pollution Control System Consisting of:

- 1. Catalytic Oxidizer, Catalytic Combustion Corp., Model SRCO 3000G, 8'-6" W. x 18'-0" L. x 10'-0" H., 1,200,000 BTU per Hour Direct Gas Fired with 4.2 Cubic Feet Catalyst Bed.
- 2. Dust Collection System Consisting of:
  - A. Two Pre-Filters, Make Camfil Farr, Model 30/30 Pleated, 24" W. x 24" L. x 2" D. Each.
  - B. Two HEPA Filters, Make Camfil Farr, Model XS Absolute, 24" W. x 24" L. x 11.5" D. Each.
- Exhaust System with One 25 H.P. Exhaust Blower Venting Ten Mixing Systems and Two Sandmills.

#### Conditions:

- 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. The operator shall operate and maintain this equipment according to the following requirements:

The catalyst bed inlet temperature shall be maintained at a minimum of 650 degrees Fahrenheit whenever the equipment it serves is in operation.

The operator shall operate and maintain a temperature measuring and recording system to continuously measure and record the temperatures at the inlet and outlet of the catalyst bed pursuant to the operation and maintenance requirements specified in 40 CFR part 64.7. Such a temperature measuring and recording system shall have an accuracy of within  $\pm 1\%$  of the temperature being monitored and shall be inspected, maintained, and calibrated on an annual basis in accordance with the manufacturer's specifications.

For the purpose of this condition, a deviation shall be defined as when the catalyst bed inlet temperature of less than 650 degrees Fahrenheit occurs during the normal operation of the equipment it serves. The operator shall review the records of the catalyst bed inlet temperature on a daily basis to determine if a deviation occurs or shall install an alarm system to alert the operator when a deviation occurs. Whenever a deviation occurs, the operator shall inspect this equipment to identify the cause of such a deviation, take immediate corrective actions to maintain the catalyst bed inlet temperature at or above 650 degrees Fahrenheit, and keep records of the duration and cause (including unknown cause, if applicable) of the deviation and the corrective actions taken.

All deviations shall be reported to South Coast AQMD pursuant to the requirements specified in 40CFR Part 64.9 and condition Nos. 22 and 23 in Section K of this permit. The monitoring report shall include the total operating time of this equipment and the total accumulated duration of all deviations for each semi-annual



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### FACTETTY RERMIT TO OPERATE BECKER SPECIALTY CORP.

reporting period specified in condition No. 23, Section K of this permit.

The operator shall submit an application with a Quality Improvement Plan (QIP) in accordance with 40CFR Part 64.8 to South Coast AQMD if an accumulation of deviations exceeds 5 percent duration of this equipment's total operating time for any semi-annual reporting period specified in condition No. 23, Section K of this permit. The required QIP shall be submitted to SCAQMD within 90 calendar days after the due date for the semi-annual monitoring report.

The operator shall inspect and maintain all components of this equipment on an annual basis in accordance with the manufacturer's specifications.

The operator shall keep adequate records in a format that is acceptable to South Coast AQMD to demonstrate compliance with all applicable requirements specified in this condition and 40CFR Part 64.9 for a minimum of five years.

[Rule 1303(a)(1)-BACT, 3004(a)(4)-periodic monitoring, 40 CFR Part 64]

- 4. The operator shall use a flame ionization detector to measure the VOC concentration in PPMV at the inlet and outlet of the catalytic oxidizer once every six months. The outlet concentration shall not exceed 5% of the inlet concentration. The analyzer shall be maintained and calibrated according to EPA Method 21 requirements. The measurements shall be taken simultaneously when the basic equipment vented to this air pollution control system is operating under its normal conditions.

  [Rule 1303(a)(1)-BACT]
- 5. The temperature indicating and recording system shall be in operation whenever the equipment it serves is in operation.
  [Rule 1303(a)(1)-BACT, 1303(b)(2)-Offset]
- 6. This equipment shall be maintained and operated at a minimum VOC destruction efficiency of 95% and a minimum collection efficiency of 90% when the basic equipment it serves is in operation.
  [Rule 1303(a)(1)-BACT]
- 7. Gauges shall be installed and maintained to continuously indicate, in inches of water, the static pressure differential across the HEPA filters. Gauges shall be located so that they can be easily visible and in clear sight of the operation or maintenance personnel. In operation, the pressure differential across the HEPA filters shall not exceed 2.5 inches of water.

  [Rule 1303(a)(1)-BACT]
- 8. The HEPA filters used in this equipment shall be individually tested and certified by the manufacturer to have control efficiency of not less than 99.97 percent on 0.3 micron particles.

  [Rule 1303(a)(1)-BACT]
- 9. The operator of this equipment shall maintain adequate records to verify compliance with the conditions of this permit. These records shall be prepared in a format which is acceptable to the South Coast AQMD, shall be retained on the premises for at least 5 years and shall be made available to South Coast AQMD personnel upon request.

  [Rule 1303(a)(1)-BACT, 1303(b)(2)-Offset]



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## EACILITY PERMIT TO OPERATE BECKER SPECIALTY CORP.

10. This equipment is subject to the applicable requirements of Rule 1147. Prior to modification of this equipment to come into compliance with the emission limit of this rule, the operator shall submit an application and receive approval for construction or modification of the equipment.

[Rule 1147]

#### Periodic Monitoring:

- 11. The operator shall conduct source test(s) in accordance with the following specifications:
  - a. The test shall be conducted at least once every five years.
  - b. The test shall be conducted no later than January 31, 2021 unless otherwise approved in writing by the South Coast AQMD.
  - c. The test shall be conducted to determine the VOC emissions using an approved South Coast AQMD method to demonstrate compliance with all applicable permit condition(s), Rules and Regulations.
  - d. The source test shall be conducted while the oxidizer is operating at a temperature of not less than the minimum operating temperature specified in this permit. If the operating temperature during the source test is greater than the minimum operating temperature specified in this permit, the minimum operating temperature specified in this permit may be increased to reflect the operating temperature during the source test.
  - e. The operator shall comply with administrative conditions Nos. 8, 9, and 10 of Section E of this facility permit.
  - f. The operator shall submit two complete copies of the source test report specified in condition No. 9 of Section E of this facility permit to the South Coast AQMD, Office of Compliance and Enforcement Attn: Air Quality and Compliance Supervisor, P.O. Box 4941, Diamond Bar, CA 91765.
    [Rule 3004(a)(4)]
- 12. The operator shall determine and record the pressure drop across the HEPA filters once every week. [Rule 3004(a)(4)]
- 13. The operator shall perform an annual inspection of the equipment and filter media for leaks, broken or torn filter media and improperly installed filter media. The operator shall keep records, in a manner approved by the South Coast AQMD, for the following parameter(s) or item(s):
  - a. The name of the person performing the inspection and/or maintenance of the filter media;
  - b. The date, time and results of the inspection; and
  - c. The date, time and description of any maintenance or repairs resulting from the inspection. [Rule 3004(a)(4)]

#### **Emissions and Requirements:**

14. This equipment is subject to the applicable requirements of the following Rules and Regulations:

CO: 2000 PPMV, Rule 407 PM: 0.1 GR/SCF, Rule 409

PM: Rule 404, see Appendix B for emission limits

NOx: 30 PPMV, Rule 1147



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# FACILITY PERMIT TO OPERATE BECKER SPECIALTY CORP.

#### **RULE 219 EQUIPMENT**

#### Equipment Description:

Rule 219 Exempt Equipment, Coating Equipment, Portable, Architectural Coatings.

#### Periodic Monitoring:

1. The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

For architectural applications where no thinners, reducers, or other VOC containing materials are added, maintain semi-annual records of all coatings consisting of (a) coating type, (b) VOC content as supplied in grams per liter (g/l) of materials for low-solids coating and (c) VOC content as supplied in g/l of coating, less water and exempt solvent, for other coatings.

For other architectural applications where thinners, reducers, or other VOC containing materials are added, maintain daily records for each coating consisting of (a) coating type, (b) VOC content as applied in grams per liter (g/l) of materials used for low-solids coatings and (c) VOC content as applied in g/l of coating, less water and exempt solvent, for other coatings.

[Rule 3004(a)(4)]

#### Emissions and Requirements:

This equipment is subject to the applicable requirements of the following Rules and Regulations:

VOC: Rule 1113, see Appendix B for emission limits VOC: Rule 1171, see Appendix B for emission limits



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### FACILITY PERMIT TO OPERATE BECKER SPECIALTY CORP.

### **RULE 219 EQUIPMENT**

#### Equipment Description:

Rule 219 Exempt Equipment, Mixers, Less Than 251-Gallon Capacity.

#### **Emissions and Requirements:**

1. This equipment is subject to the applicable requirements of the following Rules and Regulations:

VOC: Rule 1141.1, see Appendix B for emission limits VOC: 109



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# FACILITY PERMIT TO OPERATE BECKER SPECIALTY CORP.

### **RULE 219 EQUIPMENT**

#### **Equipment Description:**

Rule 219 Exempt Equipment, Hand Wiping Operations.

#### Emissions and Requirements:

1. 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