ENGINEERING EVALUATION
AUTHORITY TO CONSTRUCT

Facility Name: Woodman Auto Body

Application Number: APCD2023-APP-007986

Equipment Type: Automotive Coating [27R]

Facility ID: APCD2023-SITE-04408

Equipment Address: 7633 El Cajon Blvd Suite 101
San Diego CA, 91942

Facility Contact: Maria Jimenez
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Permit Engineer: John Lee

Senior Engineer:

X

Allison Weller
Senior Engineer

1.0 BACKGROUND

1.1 Type of Application – This is an application for new automotive coating operation. This facility did not propose to use a spray application method of coatings containing compounds Cr (III), Cr (VI), lead, manganese, nickel, cadmium or stripping material containing MeCl and so it will be exempt from the requirements of NESHAP 6H. This facility does not have any VOC controls installed to meet BACT and will therefore be limited to 10 lbs. of VOC emissions/day.

1.2 Permit History – Initial application for the business.

1.3 Facility Description – The facility is an automotive repair and refinishing operation consisting of one (1) enclosed paint spray booth equipped with overspray filters.

1.4 Other Background Information –

Records	Status	Description
APCD2023-SITE-04408	-	-
APCD2023-APP-007986	Open	Initial Application for site and installation of a spray booth

2.0 PROCESS DESCRIPTION

2.1 New Equipment Description –

Automotive refinishing operation, exempt from NESHAP 6H, and consisting of:
One (1) enclosed spray booth (Air dried – less than 194ºF);

Spray Booth-
Manufacturer: RelyOn Technologies
Model: RAF-26A
Dimensions: 26'L X 14'W X 9'H
Exhaust: One (1) fan, 14,430 cfm, equipped with filters

2.2 Process – Automotive refinishing operation using an enclosed paint booth, workstation, and mixing room to apply materials in compliance with Rule 67.20.1. The operation has an operating schedule of 7 hours per day, 5 days per week and 48 weeks per year and will be limited to less than 10 pounds per day of VOC emissions.

2.3 Emissions Controls – The use of high transfer equipment (i.e. HVLP spray guns) reduces particulate matter emissions. The enclosed paint spray booth has fiberglass filters for capturing overspray provides additional control for particulate emissions. No controls were proposed for VOC emissions.

2.4 Attachments – Emissions calculation and De Minimis

3.0 EMISSIONS

3.1 Emission Estimate Summary –

This operation will be limited to 10lbs/day of VOC emissions. The operation will also emit toxic air contaminants typical of autobody coating operations including ethylene glycol butyl ether, ethylbenzene, methyl ethyl ketone, propylene glycol monomethyl ether, toluene and xylene. Table 1 and 2 below are calculated for 2.4 gallons of paint per day with 7 hr/day, 5 days/wk, and 48 wk/yr working schedule (see attached spreadsheet for detail).

Table 1: Criteria Pollutants, Potential to Emit (Controlled*)

	Emissions		
Criteria Pollutants	lbs/hr	lbs/day	lbs/yr
VOC	1.4	9.9	2393
PM10	0.00007	0.0005	0.12

* PM control only, with standard control efficiency of HLVP, enclosed, and 98% overspray filter.

3.2 Emission Estimate Assumptions –
Assume VOC's and TAC's are emitted uncontrolled.
Assume usage equals emissions.

3.3 Emission Calculations – See attached spreadsheets.

3.4 TAC Emissions –

Table 2. Potential to Emit (Controlled*)

		Emissions	
TAC	CAS #	lbs/hr	lbs/yr
100414	Ethyl Benzene	2.9E-02	4.9E+01
111762	Ethylene Glycol Monobutyl Ether	5.1E-03	8.5E+00
110543	N-Hexane	1.5E-03	2.5E+00
67630	Isopropanol	4.5E-02	7.6E+01
67561	Methanol	6.3E-03	1.1E+01
78933	Methyl Ethyl Ketone	5.8E-02	9.8E+01
107982	Propylene Glycol Monomethyl Ether	3.3E-03	5.5E+00
100425	Styrene	1.8E-02	3.1E+01
108883	Toluene	1.6E-01	2.6E+02
1330207	Xylene	1.6E-01	2.8E+02
7440484	Cobalt	1.2E-07	2.0E-04
7440508	Copper	5.9E-08	9.9E-05
7439921	Lead	1.4E-06	2.4E-03
7440020	Nickel	1.2E-07	2.0E-04
7782492	Selenium	2.9E-08	4.9E-05
98566	PCBTF	1.7E+00	2.9E+03

* PM control only, with standard control efficiency of HLVP, enclosed, and 98% overspray filter.

4.0 APPLICABLE RULES

4.1 Prohibitory Rules

4.1.1 Rule 50 - *Visible Emissions*

Visible emissions cannot exceed 20% opacity for more than 3 minutes in any consecutive 60-minute period.

This coating operation will occur in an enclosed spray booth with exhaust fan and filters. Particulate emissions from paint overspray will be captured in the booth and controlled by filter media. Particulate emissions from paint overspray are expected to be negligible. This unit is expected to follow this rule.

4.1.2. Rule 51- *Nuisance*

A person shall not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health or safety of any such persons or the public

or which cause or have a natural tendency to cause injury or damage to business or property.

Compliance is expected based on other existing compliant sites. Coatings will be applied in a spray booth with HVLP spray guns (or other Rule 67.20.1 compliant method). VOC emissions will be limited through permit conditions.

4.1.3. Rule 52 – *Particulate Matter*
This rule prohibits the discharge into the atmosphere from any source particulate matter in excess of 0.10 grains per dry standard cubic foot of gas.

Particulate emissions from this operation are expected to negligible with HVLP spray guns and booth filters. Compliance with this rule is expected.

4.1.4. Rule 66.1 – *Miscellaneous Surface Coating Operations and Other Processes Emitting Volatile Organic Compounds*
This rule is applicable to all surface coating, solvent cleaning or other operations or processes that may result in emissions of VOCs.

Per Rule 67.20.1(a)(3), Rule 66, 66.1, or 67.3 shall not apply to motor vehicle and mobile equipment coating operations which are subject to or exempt from Rule 67.20.1.

This rule is not applicable since the proposed equipment is subject to District Rule 67.20.1.

4.1.5. Rule 67.17 *Storage of Materials Containing Volatile Organic Compounds*
This rule applies to any person who stores, transfers, applies or otherwise uses materials which contain volatile organic compounds.

Per Rule 67.17(d) Any person subject to this rule shall comply with the following:
(1) All containers used to store, transfer, apply or otherwise employ materials containing VOC shall be closed when not in use.
(2) All containers used to store or transfer wastes containing VOC shall be closed except when being accessed or when empty.
(3) Containers specified above may be equipped with vents provided such vents are necessary to comply with applicable fire and safety codes.
(4) All wastes containing VOC (including paper or cloth impregnated with VOC) shall be stored in closed containers.

The equipment is expected to comply. ATC and PTO conditions will require containers containing VOCs be closed when not in use.

4.1.6. Rule 67.20.1 – *Motor Vehicle and Mobile Equipment Refinishing Operations*
This Rule applies to motor vehicle and mobile equipment refinishing (coating) operations, including the refinishing or finishing of motor vehicles, mobile equipment, bicycles, non-motorized models, and their component parts.
4.1.6.1. Rule 67.20.1(d)(1) *Coating VOC Limit*

A person shall not conduct any motor vehicle and mobile equipment coating operation by using any coating with a VOC content in excess of the following limits

Coating Category	VOC content limit per volume of coating as applied, less water and exempt compounds (VOC content of coatings, regulatory)	
	gram/liter	(lb/gal)
Adhesion Promoter	540	4.5
Clear Coating	250	2.1
Color Coating	420	3.5
Multi-Color Coating	680	5.7
Pigmented Coating for Military Tactical Support Vehicles and Equipment	420	3.5
Pretreatment Coating	660	5.5
Primer	250	2.1
Primer for Military Tactical Support Vehicles and Equipment	420	3.5
Primer Sealer	250	2.1
Single-Stage Coating	340	2.8
Temporary Protective Coating	60	0.5
Truck Bed Liner Coating	310	2.6
Underbody Coating	430	3.6
Uniform Finish Coating or Blender	540	4.5
Any other coating type	250	2.1

General coatings identified for uses at this facility are expected to comply with the VOC standards (see the attached emission calculations spreadsheet). Compliance with this subsection is expected.

4.1.6.2. Rule 67.20.1(d)(2) *Most Restrictive VOC Content Limit*

If anywhere on the automotive coating container, or any label or sticker affixed to the container, or in any sales, advertising, or technical literature, any representation is made that indicates that the coating meets the definition of or is recommended for use for more than one of the coating categories listed in Subsection (d)(1), then the lowest VOC content limit shall apply.

Compliance with this subsection is expected.

4.1.6.3. Rule 67.20.1(d)(3) *Coating Application Equipment:*
A person shall conduct motor vehicle and mobile equipment coating operations by using only the following coating application methods:
(i) Electrostatic spray application; or
(ii) Flow coat application; or
(iii) Dip coat application; or
(iv) Roll coat; or
(v) Hand application methods; or
(vi) High-volume low-pressure (HVLP) spray. Facilities using an HVLP spray gun shall have available on-site pressure gauges in proper operating condition to measure the air cap pressure or have available manufacturer's technical information regarding the correlation between the handle air inlet pressure and the air cap pressure. If the correlation option is used to demonstrate compliance, a handle air inlet pressure gauge will be required on site in proper operating condition to measure the handle air inlet pressure; or
(vii) Other coating application methods that are demonstrated to have transfer efficiency at least equal to one of the above application methods, and which are used in such a manner that the operating parameters under which they were demonstrated to achieve such transfer efficiency are permanent features of the method. Such coating application methods shall be approved in writing by the Air Pollution Control Officer prior to use.

Proposed application equipment is compliant HVLP spray guns. Conditions will be included in the ATC and PTO to ensure this.

4.1.6.4. Rule 67.20.1(d)(4) *Cleaning of Coating Application Equipment*
A person shall not clean coating application equipment used in motor vehicle and mobile equipment coating operations unless:
(i) The VOC content of cleaning material does not exceed 25 grams per liter (0.21 lbs/gal), as applied; and
(ii) The cleaning material is flushed or rinsed through the application equipment, including paint lines, without exposure to air, into a container which has in place a lid that completely covers the container and has no visible holes, breaks or openings; and either
(iii) The application equipment or equipment parts are cleaned in a container which is open only when being accessed for adding, cleaning, or removing application equipment or when cleaning material is being added, provided the cleaned equipment or equipment parts are drained to the container until dripping ceases; or
(iv) A system is used that totally encloses the component parts being cleaned during the washing, rinsing, and draining process.

Per Rule 67.20.1(b)(5) The provisions of Subsections (d)(4)(iii) and (d)(4)(iv) shall not apply to cleaning of coating application equipment provided that the cleaning material does not contain any exempt

compounds and the VOC content of cleaning material does not exceed 25 grams per liter (0.21 lbs/gal).

Proposed cleaning material is High Teck 7801V and has VOC content of 25 g/L, which is compliant with the VOC requirement of this rule.

4.1.6.5. Rule 67.20.1(d)(5) *Surface Preparation and Other Cleaning Operations*
A person shall not use any material for surface preparation or any other surface cleaning unless its VOC content is 25 grams or less per liter of material (0.21 lbs/gal), as applied.

Proposed cleaning/surface preparation material is High Teck 7801V, which is compliant with the VOC requirement of this rule.

4.1.6.6. Rule 67.20.1(d)(6) *Waste Disposal*
A person shall not use coating application equipment or any other means to dispose of waste coatings, coating components, surface preparation materials, or cleaning materials by spraying into the air, except when momentarily purging coating material from a spray applicator cap immediately before or after applying the coating material.

Compliance is expected with this section.

4.1.6.7. Rule 67.20.1(f) *Prohibition of Manufacture or Sale, Specification and Possession*
A person shall not manufacture, blend, repackage for sale, supply, sell, offer for sale, possess, solicit, require the use, or distribute for use within the District any automotive coating or associated cleaning material with a VOC content in excess of the limits specified in Subsections (d)(1), (d)(4) and (d)(5), except as provided in Subsections (b)(3), (b)(6) or for use with control equipment specified in Section (e).

Compliance is expected with this section.

4.1.6.8. Rule 67.20.1(g) *Manufacturer and Supplier Information*
Any person, who manufactures, sells, offers for sale, or supplies any coating, coating component, or associated cleaning material for use in motor vehicle and mobile equipment coating operations in or outside of San Diego County shall provide the following information to customers:
(1) The manufacturer's name and identification of each coating or coating component, components mix ratio, surface preparation and cleaning material; and
(2) The applicable coating category(ies) as specified in Subsection (d)(1) and the VOC content of coatings, actual and VOC content of coatings, regulatory, as supplied, expressed in grams per liter or pounds per gallon and printed on a coating container label and/or manufacturer data sheet for each automotive coating, and automotive coating component.

(3) The VOC content of each cleaning material as supplied, expressed in grams per liter or pounds per gallon, and printed on the cleaning material's container label.

Compliance is expected with this section.

4.1.6.9. Rule 67.20.1(h) *Recordkeeping*

Any person subject to the provisions of this rule shall maintain records, as applicable, in accordance with the following:

(1) Automotive Coating and Cleaning Materials

Except as otherwise provided in Subsection (b)(2), any person subject to any of the provisions of Subsections (d)(1) through (d)(5) shall:

(i) Maintain a current list of coatings, coating components, and cleaning materials in use. This list shall provide all the data necessary to evaluate compliance, including, but not limited to:

(A) Material name, manufacturer and manufacturer identification.

(B) Type and applicable coating category specified in Subsection (d)(1) of each coating used and the specific mix ratio.

(C) VOC content of coatings, actual and VOC content of coatings, regulatory, as applied, and VOC content of cleaning material, as used.

(ii) Maintain monthly purchase records of coatings and cleaning materials identifying the coating category specified in Subsection (d)(1), name and volume of material purchased.

(iii) Maintain monthly or daily records showing the manufacturer, manufacturer identification, and amount of each coating, coating components, and cleaning material used. For coatings used, the records must also contain the applicable coating category(ies) as specified in Subsection (d)(1).

(iv) Maintain current manufacturer specification sheets, material safety data sheets, product data sheets, or technical bulletins, which list the VOC content of coatings, actual and VOC content of coatings, regulatory, and the VOC content of automotive coating components and of each cleaning material.

(2) Control Equipment

(3) Manufacturer and Supplier Records

Any person subject to the provisions of Sections (f) or (g) of this rule shall maintain records of all automotive coatings, coating components, and associated cleaning materials sold for use in, or delivery to, San Diego County, or sold for use or delivery outside of San Diego County. For each material sold, these records shall show the name and business address of the purchaser, the material manufacturer and manufacturer identification, and the type and amount of material sold.

(4) All records specified in this Section (h) shall be retained on site for at least three years and made readily available to the district upon request.

ATC and PTO conditions will require maintenance of a list of automotive coating materials as well as adequate records of automotive coating materials as specified in this section.

4.2 Rule 20.2 *New Source Review (NSR) – Non-Major Stationary Sources*

This rule is applicable to any new or modified stationary source or emission unit if the stationary source is not a major stationary source. A federal major stationary source, as defined in Rule 20.1(c)(30), means "any emission unit, project or stationary source which has, or will have after issuance of an Authority to Construct or modified Permit to Operate, an aggregate potential to emit one or more air contaminants in amounts equal to or greater than any of the emission rates listed below in Table 20.1 –5b".

TABLE 20.1 – 5b
Federal Major Stationary Source

Air Contaminant	Emission Rate (Ton/yr)
Fine Particulate Matter ($PM_{2.5}$)	100
Particulate Matter (PM_{10})	100
Oxides of Nitrogen (NOx)*	
marginal or moderate	100
serious	50
severe	25
extreme	10
Volatile Organic Compounds (VOC)*	
marginal or moderate	100
serious	50
severe	25
extreme	10
Oxides of Sulfur (SOx)	100
Carbon Monoxide (CO)	100
Lead (Pb)	100

* based on EPA's ozone nonattainment designation for the San Diego Air Basin in 40 CFR 81.305

This stationary source is not a Federal Major Stationary Source, so Rule 20.2 is applicable.

4.2.1 Rule 20.2 (d)(1)(i) *BACT for New or Modified Emission units*

Any new or modified emission unit which has any increase in its potential to emit particulate matter (PM10), oxides of nitrogen (NOx), volatile organic compounds (VOC) or oxides of sulfur (SOx) and which unit has a post-project potential to emit of 10 pounds per day or more of PM10, NOx, VOC, or SOx shall be equipped with Best Available Control Technology (BACT) for each such air contaminant.

VOC emissions will be limited to less than 10 lbs per day, therefore it does not trigger BACT.

4.2.2 Rule 20.2(d)(2)-(4) *AQIA, PSD & Public Notification for New or Modified Emission Units*

For any project which results in an increase in emissions equal to or greater than any of the amounts listed in Table 20.2-1, the applicant shall perform an AQIA (Air Quality Impact Analysis), install equipment to satisfy PSD (Prevention of Significant Deterioration) and issue a Public Notice and Comment period. A public notice and comment period is also required for any project which results in an emissions increase of VOCs equal to or greater than 250 pounds per day or 40 tons per year.

TABLE 20.2 - 1
AQIA Trigger Levels

	Emission Rate		
Air Contaminant	(lb/hr)	(lb/day)	(tons/yr)
Particulate Matter (PM_{10})	---	100	15
Fine Particulate Matter ($PM_{2.5}$)	---	67	10
Oxides of Nitrogen (NOx)	25	250	40
Oxides of Sulfur (SOx)	25	250	40
Carbon Monoxide (CO)	100	550	100
Lead and Lead Compounds	---	3.2	0.6

The facility emissions are below the levels listed in Table 20.2-1, therefore an AQIA is not required.

4.3 *Toxic New Source Review- Rule 1200*

Rule 1200 applies to any new, relocated or modified emission unit which results in any increase in emissions of one or more toxic air contaminant(s), and for which an Authority to Construct or Permit to Operate is required. This rule requires health risks be reviewed to ensure the risks are below one in one million for cancer (with T-BACT installed), and that the health hazard index is less than one from chronic non-cancer and acute toxic air contaminants.

Per Rule 1200(b)(1)(v)(d) The standards of section (d) of Rule 1200 shall not apply to automotive refinishing operations not using chrome or lead pigmented coatings provided the resulting increase in maximum incremental cancer risk at every receptor location is less than 100 in one million, the total acute noncancer health hazard index is less than 10 and the total chronic noncancer health hazard index is less than 10.

This automotive refinishing operation does not use hexavalent chrome or lead pigmented coatings. Annual limit for PCBTF will be included as a condition such that the resulting increase in health risks do not exceed the thresholds.

Conditions will be included to ensure that hexavalent chromium and lead are not used.

4.4 *AB3205*

AB3205 requires a public notice prior to issuing an Authority to Construct for equipment emitting hazardous air contaminants at a facility within 1000 feet of a school.

There is a school, St Martin of Tours Academy, within 1,000 ft of the facility. AB3205 notification will be sent out prior to issuing ATC.

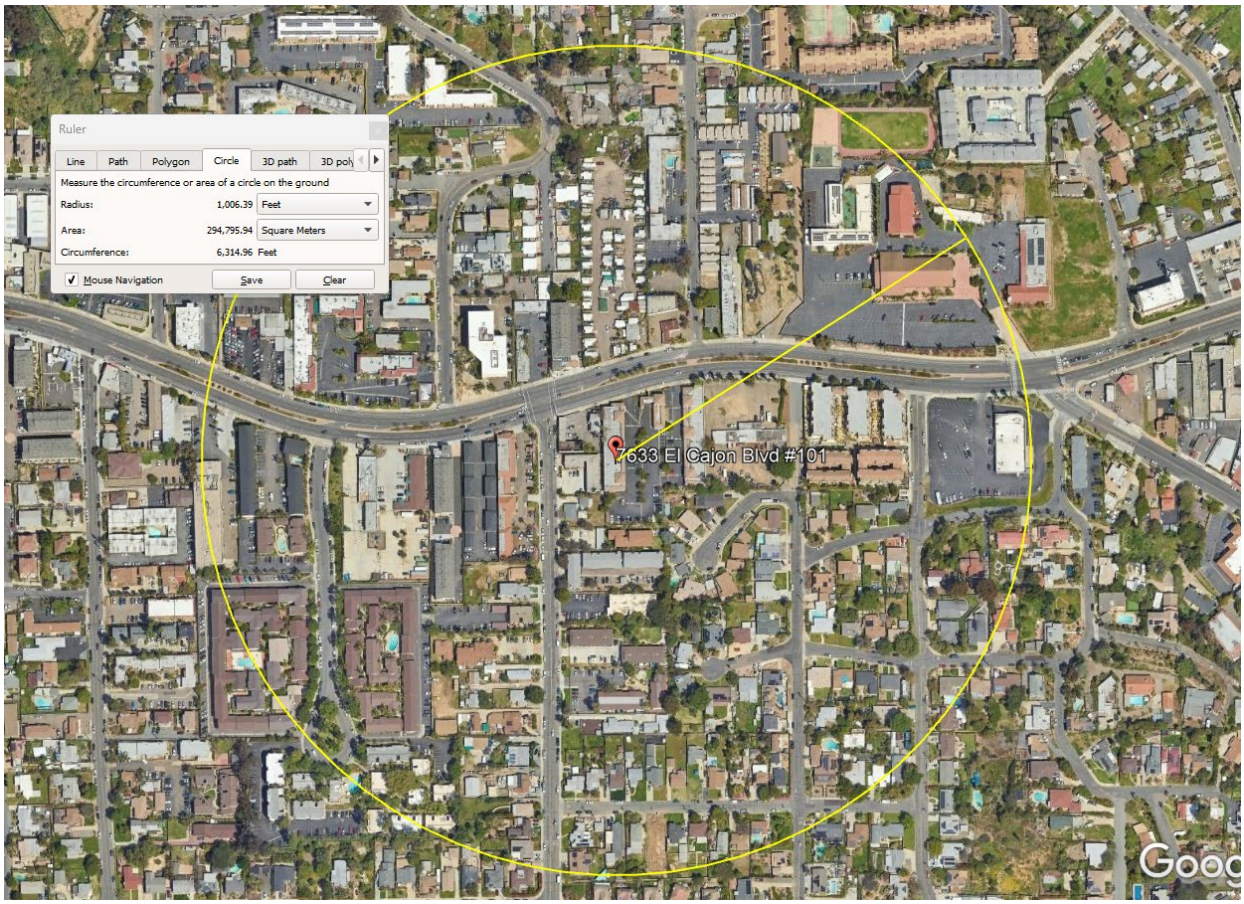

Figure 1: AB3205 Aerial Map. There is a preschool within 1,000 feet.

4.5 NSPS, NESHAPS AND ATCMs-

4.5.1 NSPS –

None

4.5.2 NESHAPS –40 CFR Part 63 Subpart HHHHHH (6H) – *Source Category: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources*

§ 63.11170 ***Am I subject to this subpart?***

(a) You are subject to this subpart if you operate an area source of HAP as defined in paragraph (b) of this section, including sources that are part of a tribal, local, State, or Federal facility and you perform one or more of the activities in paragraphs (a)(1) through (3) of this section:

a. Perform paint stripping using MeCl for the removal of dried paint (including, but not limited to, paint, enamel, varnish, shellac, and lacquer) from wood, metal, plastic, and other substrates.

b. Perform spray application of coatings, as defined in § 63.11180, to motor vehicles and mobile equipment including operations that are located in stationary structures at fixed locations, and mobile repair and refinishing operations that travel to the customer's location, except spray coating applications that meet

the definition of facility maintenance in § 63.11180. However, if you are the owner or operator of a motor vehicle or mobile equipment surface coating operation, you may petition the Administrator for an exemption from this subpart if you can demonstrate, to the satisfaction of the Administrator, that you spray apply no coatings that contain the target HAP, as defined in § 63.11180. Petitions must include a description of the coatings that you spray apply and your certification that you do not spray apply any coatings containing the target HAP. If circumstances change such that you intend to spray apply coatings containing the target HAP, you must submit the initial notification required by 63.11175 and comply with the requirements of this subpart.

c. Perform spray application of coatings that contain the target HAP, as defined in § 63.11180, to a plastic and/or metal substrate on a part or product, except spray coating applications that meet the definition of facility maintenance or space vehicle in § 63.11180.

Verified with applicant that no MeCl will be used. This operation will not use any HAPs, which means it is not subject to this NESHAP.

4.5.3 ATCM - Title 17 CCR, Section 93112 – *Hexavalent Chromium and Cadmium Airborne Toxic Control Measure (ATCM) -- Motor Vehicle and Mobile Equipment Coatings*

(a)(2) This section applies to the owner or operator of any motor vehicle and / or mobile equipment coating facility that uses motor vehicle and / or mobile equipment coatings in California.

(d)(1) Except as provided in subdivision (e), no person shall sell, supply, offer for sale, or manufacture for sale in California any motor vehicle and/or mobile equipment coating that contains hexavalent chromium or cadmium.

The facility does not propose to use any coatings containing hexavalent chromium or cadmium. A condition will be added to the permit not allowing the use of hexavalent chromium and cadmium.

5.0 RECOMMENDATION

The proposed automotive refinishing operation at this site is expected to comply with the relevant District, State and Federal rules.

6.0 RECOMMENDED CONDITIONS

The issuance of an ATC is recommended with standard conditions APCD2018-CON-001451, 27R – automotive, less than 10 lbs VOC per day, 6H exempt and shall also include the following TAC specific conditions per approved HRA:

Condition Name	Previous	Updated
New 1	No previous condition, this is a new condition.	Annual emissions of toxic air contaminants (TACs), as defined in District Rule 1200 (Revisions Effective 09/19/23), shall be limited to the following, per twelve (12) consecutive month period: 1-Chloro-4-(trifluoromethyl)benzine (PCBTF, CAS #: 98-56-6): 2,922 lbs/year Compliance with these limits shall be demonstrated through record keeping and District defined emissions calculation method established in the conditions of this Permit. (Rule 1200 and 21)
New 2	No previous condition, this is a new condition.	1-Chloro-4-(trifluoromethyl)benzine (PCBTF) emissions shall be calculated as follows: Emissions/Day = U x D x Ci Where U = Daily usage of materials containing PCBTF (gallons/day) D = Density of material per SDS (pounds/gallon) Ci = Weight fraction of PCBTF in material per SDS (%) Emissions for each 12-month period shall be calculated by summing the daily emissions for each month included in that period. (Rule 1200)
C40732; Now, New 3	Permittee shall maintain records in accordance with Rule 67.20.1. These records shall include the following information:	Permittee shall maintain records in accordance with Rule 67.20.1. These records shall include the following information:

	a. a current list of coatings, precoats, primers, catalysts, thinners, additives, surface preparation materials, equipment cleaning materials, and stripping materials in use. This list shall include the following information: 1. material name, manufacturer and manufacturer identification; 2. type and applicable coating category as specified in Rule 67.20.1(d)(1) for each coating in use and the specific mix ratio; 3. VOC content (actual and regulatory, as applied) for all materials containing VOC; b. current manufacturer specification sheets, material safety data sheets (MSDS), product data sheets, or technical bulletins for all materials in use, which shall list all components within each coating, precoat, primer, catalyst, thinner, additive, surface preparation, equipment cleaning, and stripping materials in use. The manufacturer specification sheets, material safety data sheets, product data sheets, or technical bulletins shall also include: the VOC content (actual and regulatory), toxic air contaminant (TAC) content weight or weight percentage, and material density (weight per volume) or material specific gravity (material density relative to the density of water) for all materials in use; c. monthly purchase and daily or monthly usage of each material containing VOCs. If monthly records are maintained, the number of operating days per calendar month shall be recorded; d. type of application equipment used; and, e. if applicable, all District approval documentation for coating application equipment, issued in accordance with Rule 67.20.1(d)(3)(vii). (Rules 67.20.1 and 21)	a. a current list of coatings, precoats, primers, catalysts, thinners, additives, surface preparation materials, equipment cleaning materials, and stripping materials in use. This list shall include the following information: 1. material name, manufacturer, manufacturer identification, and density; 2. type and applicable coating category as specified in Rule 67.20.1(d)(1) for each coating in use and the specific mix ratio; 3. VOC content (actual and regulatory, as applied) for all materials containing VOC; 4. p-Chloro-a,a,a-trifluorotoluene weight percentage (also known as PCBTF - CAS # 98-56-6) for all materials containing PCBTF; b. current manufacturer specification sheets, material safety data sheets (MSDS), product data sheets, or technical bulletins for all materials in use, which shall list all components within each coating, precoat, primer, catalyst, thinner, additive, surface preparation, equipment cleaning, and stripping materials in use. The manufacturer specification sheets, material safety data sheets, product data sheets, or technical bulletins shall also include: the VOC content (actual and regulatory), toxic air contaminant (TAC) content weight or weight percentage, and material density (weight per volume) or material specific gravity (material density relative to the density of water) for all materials in use; c. monthly purchase and daily usage records of each material containing VOCs; d. type of application equipment used; and, e. if applicable, all District approval documentation for

		coating application equipment, issued in accordance with Rule 67.20.1(d)(3)(vii). (Rules 67.20.1, 21, 1200)