

Commercial Pattern Inc.

3162 Baumberg Ave
Hayward, CA 94545

Facility #: A6499

February 16, 2012

Director of Compliance and Enforcement

Attn: Title V Reports
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109

RECEIVED

2012 FEB 21 PM 11 35

BAY AREA AIR QUALITY
MANAGEMENT DISTRICT

Subject: Title V Semi-Annual Monitoring Report for Facility # A6499
August 1st 2011 to January 31st 2012

This Semi-Annual Report is being submitted in response to Section I, Standard
Conditions Clause F, Monitoring Report.

Commercial Pattern, Inc. is submitting this monitoring report as required by the Bay Area
Air Quality Management District. The permit requires only monitoring by record,
periodically, daily and by event, for source specific permits conditions. This facility
maintains records of all product and quantities delivered and production by equipment
run. We maintain and review product MSDS and applicable emission data for products
delivered for consumption by source.

I certify to the best of my knowledge this to be a true and accurate statement.

Sincerely, Mark Looby
President



Title V Semi-Annual Monitoring Verification Report

**Table VII-A
Applicable Limits and Compliance Monitoring Requirements
S1 - Fiberglass Operation**

Type of Limit	Citation of Limit	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance
Weight Loss from VOC Emissions	BAAQMD 8-50-301.5 BAAQMD Condition #9997, part 4b	N	weight loss/emissions from vapor suppressed resin \leq 50 g/m ² surface area or compliance with BAAQMD 8-50-301.5 or 8-50-301.7	BAAQMD 8-50-501.3 BAAQMD Condition #9997, part 7 plus 11	P/E	records	N/A
VOC	BAAQMD 8-50-301.6 BAAQMD Condition #9997, parts 2 plus 4a	N	applicable limits for openmold resin or gel coat in BAAQMD 8-50-301, Table 1 or compliance with BAAQMD 8-50-301.5 or 8-50-301.7	BAAQMD 8-50-501.2a BAAQMD Condition #9997, part 7 plus 11	P/E	records	Y
VOC	BAAQMD 8-50-301.7	N	monomer content up to 10% more than applicable limits in BAAQMD 8-50-301, Table 1 of resins and gel coats used to touch up, repair or install a composite product and the use of hand-held atomized spray technologies with a container that is part of gun with capacity \leq 1 quart or compliance with BAAQMD 8-50-301.5 or 8-50-301.6	BAAQMD 8-50-501.2 BAAQMD Condition #9997, part 7 plus 11	P/E	records	Y

Title V Semi-Annual Monitoring Verification Report

**Table VII-A
Applicable Limits and Compliance Monitoring Requirements
S1 - Fiberglass Operation**

Type of Limit	Citation of Limit	FE	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/E/N)	Monitoring Type	Compliance
VOC	BAAQMD 8-50-304 and BAAQMD Condition #9997, part 4c	N	applicable limits for corrosion resistant materials in BAAQMD 8-50-301, Table 1	BAAQMD 8-50-501.2a BAAQMD Condition #9997, part 7 plus 11	P/E	records	Yes
VOC	BAAQMD 8-50-305.4 BAAQMD Condition #9997 part 6	N	content of cleaning material, ≤ 25 g/liter	BAAQMD 8-50-501.2b and Condition #9997, part 7 plus 11	P/E	records	Yes
VOC	SIP 8-50-301.1	Y	monomer content of resin $\leq 35\%$ by weight or compliance with BAAQMD 8-50-301.2 or 8-50-304	SIP 8-50-501.2 BAAQMD Condition #9997, part 7 plus 11	P/E	records	Yes
Weight Loss from VOC Emissions	SIP 8-50-301.2	Y	weight loss/emissions from vapor suppressed resin ≤ 60 g/m ² Surface area or compliance with BAAQMD 8-50-301 or 8-50-304	SIP 8-50-501.3 BAAQMD Condition #9997, part 7 plus 11	P/E	records	N/A

Title V Semi-Annual Monitoring Verification Report

**Table VII-A
Applicable Limits and Compliance Monitoring Requirements
S1 - Fiberglass Operation**

Type of Limit	Citation of Limit	EE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance
VOC	SIP 8-50-304	Y	monomer content of corrosion resistant materials \leq 50% by weight or compliance with BAAQMD 8-50-301.2	SIP 8-50-501.2 and BAAQMD Condition #9997, part 7 plus 11	P/E	records	Yes
VOC	SIP 8-50-305.4	Y	content of cleaning material \leq 200 g/liter	SIP 8-50-501.2 and Condition #9997, part 7 plus 11	P/E	records	Yes
VOC	SIP 8-50-307	Y	content of gel coat, as applied \leq 250 g/liter	SIP 8-50-501.2 and Condition #9997, part 7 plus 11	P/E	records	Yes
Material Through put	BAAQMD Condition #9997, part 1	Y	Gelcoat throughput < 4,100 gal/yr and compliance with BAAQMD Condition #9997, parts 8 plus 9 or none of the above but compliance with BAAQMD Condition #9997, part 10	BAAQMD Condition #9997, parts 7 and 11	P/D	records	Yes

Title V Semi-Annual Monitoring Verification Report

**Table VII-A
Applicable Limits and Compliance Monitoring Requirements
S1 - Fiberglass Operation**

Type of Limit	Citation of Limit	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance
Material Through put	BAAQMD Condition #9997, part 3	Y	Resin Throughput < 32,000 gal/yr and compliance with BAAQMD Condition #9997, parts 8 plus 9 or none of the above but compliance with BAAQMD Condition #9997, part 10	BAAQMD Condition #9997, part 7 plus 11	P/D	records	Yes
NPOC	BAAQMD Condition #9997, part 10b	N	NPOC emissions ≤ 3.630 tpy and compliance with BAAQMD Condition # 9997, part 10a and c	BAAQMD Condition #9997, part 7 plus 11	P/D	records	X
HAP	40 CFR 63.5805(a)	Y	Open molding - tooling - with Mechanical resin application < 254 lb/ton	40 CFR 63.5810	P/E	records	N/A
HAP	40 CFR 63.5805(a)	Y	Open molding - tooling - with Manual resin application < 157 lb/ton	40 CFR 63.5810	P/E	records	N/A
HAP	40 CFR 63.5805(a)	Y	Open molding - low flame spread/low smoke products - with Mechanical resin application < 497 lb/ton	40 CFR 63.5810	P/E	records	N/A
POC	BAAQMD Condition #9997, part 10a	Y	POC emissions ≤ 11.008 tpy and compliance with BAAQMD Condition #9997, part 10b and c	BAAQMD Condition #9997, parts 7 and 11	P/D	records	Yes
POC	BAAQMD Condition #9997, part 13	Y	Mechanical non-atomized application for mechanical application of catalyzed resin and chopped glass fibers to an open mold	BAAQMD Condition #9997, parts 7 and 11	P/D	records	Yes

Title V Semi-Annual Monitoring Verification Report

**Table VII-A
Applicable Limits and Compliance Monitoring Requirements
S1 - Fiberglass Operation**

Type of Limit	Citation of Limit	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance
HAP	40 CFR 63.5805(a)	Y	Open molding - low flame spread/low smoke products - with Manual resin application < 238 lb/ton	40 CFR 63.5810	P/E	records	Yes
HAP	40 CFR 63.5805(a)	Y	Open molding - gelcoat: Tooling gel coating < 440 lb/ton	40 CFR 63.5810	P/E	records	Yes
HAP	40 CFR 63.5805(a)	Y	Open molding - gelcoat: White/off white pigmented gel coating < 267 lb/ton	40 CFR 63.5810	P/E	records	Yes
HAP	40 CFR 63.5805(a)	Y	Open molding - gelcoat: All other pigmented gel coating < 377 lb/ton	40 CFR 63.5810	P/E	records	Yes
TAC	BAAQMD Condition # 9997, part 10c	Y	TAC emissions \geq TAC risk screening level and compliance with BAAQMD Condition # 9997, part 10a and b	BAAQMD Condition # 9997, parts 7 plus 11	P/D	records	Yes
NPOC	BAAQMD Condition # 9997, part 5	N	Cleanup solvent < 1,100 gal/yr and compliance with BAAQMD Condition #9997, parts 8 plus 9 or none of the above but compliance with BAAQMD Condition #9997, part 10	BAAQMD Condition # 9997, parts 7 plus 11	P/D	records	Yes

Title V Semi-Annual Monitoring Verification Report

Table VII-A
Applicable Limits and Compliance Monitoring Requirements
S1 - Fiberglass Operation

Type of Limit	Citation of Limit	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance
Opacity	BAAQMD 6-301	Y	Ringelmann 1.0 for < 3 minutes/hr	BAAQMD Condition # 9997, part 15	P/D	Visual Filter inspection	Yes
FP	BAAQMD 6-310	N	0.15 gr/dscf	BAAQMD Condition #9997, part 15	P/D	Visual Filter inspection	Yes
FP	BAAQMD 6-1-311	Y	4.10P _{0.87} lb/hr but not to exceed 40 lb/hr, where P is process weight, ton/hr	BAAQMD Condition #9997, part 15	P/D	Visual Filter inspection	Yes
FP	SIP 6-311	Y	4.10P _{0.87} lb/hr but not to exceed 40 lb/hr, where P is process weight, ton/hr	BAAQMD Condition #9997, part 15	P/D	Visual Filter inspection	Yes
Opacity	SIP 6-301	Y	Ringelmann 1.0 for < 3 minutes/hr	BAAQMD Condition #9997, part 15	P/D	Visual Filter inspection	Yes
FP	SIP 6-310	Y	0.15 gr/dscf	BAAQMD Condition #9997, part 15	P/D	Visual Filter inspection	Yes

Title V Semi-Annual Monitoring Verification Report

**Table VII-B
Applicable Limits and Compliance Monitoring Requirements
S2 - Booth and Brush Area for Bus Component Coating Operation**

Type of Limit	Citation of Limit	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance
POC	BAAQMD Condition #22654, part 1	Y	shall not apply more than 5,380 gallons of Firetemp SI coating during any consecutive 12-month period. (basis: Cumulative Increase	BAAQMD 8-45-501 Condition #22654, part 4	P/E	records	Yes
	BAAQMD Condition #22654, part 2a	Y	Total POC emissions from S-2 do not exceed 1 ton in any consecutive twelve month period.	BAAQMD 8-45-501 Condition #22654, part 4	P/E	records	Yes
	BAAQMD Condition #22654, part 3	Y	maintain a current list of all materials used at S-2 and MSDSs for each. The list shall provide all of the data necessary to evaluate compliance.	BAAQMD 8-45-501 Condition #22654, part 4	P/E	records	Yes
Voc	BAAQMD Condition #22654, part 5	Y	The permit holder shall not use any coating subject to 40 CFR 82, Protection of Stratospheric Ozone. (basis: Regulation 206-503	BAAQMD 8-45-501 Condition #22654, part 4	P/E	records	Yes

Title V Semi-Annual Monitoring Verification Report

**Table VII-B
Applicable Limits and Compliance Monitoring Requirements
S2 - Booth and Brush Area for Bus Component Coating Operation**

Type of Limit	Citation of Limit	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance
VOC	BAAQMD 8-45-301.3	N	Adhesion promoter limit: 840 g/l or 7.0 lb/gal	BAAQMD 8-45-501	P/W	records	N/A
VOC	BAAQMD 8-45-301.3	N	Clear coating limit: 250 g/l or 2.1 lb/gal	BAAQMD 8-45-501	P/W	records	N/A
VOC	BAAQMD 8-45-301.3	N	Color coating limit: 420 g/l or 3.5 lb/gal	BAAQMD 8-45-501	P/W	records	N/A
VOC	BAAQMD 8-45-301.3	N	Multi-color coating limit: 680 g/l or 5.7 lb/gal	BAAQMD 8-45-501	P/W	records	N/A
VOC	BAAQMD 8-45-301.3	N	Pretreatment coating limit: 660 g/l or 5.5 lb/gal	BAAQMD 8-45-501	P/W	records	N/A
VOC	BAAQMD 8-45-301.3	N	Primer limit: 250 g/l or 2.1 lb/gal	BAAQMD 8-45-501	P/W	records	N/A
VOC	BAAQMD 8-45-301.3	N	Primer Sealer limit: 340 g/l or 2.8 lb/gal	BAAQMD 8-45-501	P/W	records	N/A
VOC	BAAQMD 8-45-301.3	N	Single Stage coating limit: 420 g/l or 3.5 lb/gal	BAAQMD 8-45-501	P/W	records	N/A
VOC	BAAQMD 8-45-301.3	N	Temporary protective coating limit: 60 g/l or 0.5 lb/gal	BAAQMD 8-45-501	P/W	records	N/A

Title V Semi-Annual Monitoring Verification Report

**Table VII-B
Applicable Limits and Compliance Monitoring Requirements
S2 - Booth and Brush Area for Bus Component Coating Operation**

Type of Limit	Citation of Limit	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/W/N)	Monitoring Type	Compliance
VOC	BAAQMD 8-45-301.3	N	Truck bed liner coating limit: 310 g/l or 2.6 lb/gal	BAAQMD 8-45-501	P/W	records	N/A
VOC	BAAQMD 8-45-301.3	N	Underbody coating limit: 430 g/l or 3.6 lb/gal	BAAQMD 8-45-501	P/W	records	N/A
VOC	BAAQMD 8-45-301.3	N	Uniform finish coating limit: 540 g/l or 4.5 lb/gal	BAAQMD 8-45-501	P/W	records	N/A
VOC	BAAQMD 8-45-301.3	N	Other coating type Limit: 250 g/l or 2.1 lb/gal	BAAQMD 8-45-501	P/W	records	N/A
VOC	BAAQMD 8-45-308.5	N	Surface Preparation Solvent: General limit: 25 g/l or 0.2 lb/gal; Bug and tar remover: 350 g/l or 2.9 lb/gal	BAAQMD 8-45-501	P/W	records	N/A
Coating usage	BAAQMD 8-45-312	Y	Combined volume of adhesion promoter, uniform finish coating and multi-color coating < 5% of topcoats applied, montly basis	BAAQMD 8-45-501	P/W	records	N/A
VOC	SIP 8-45-301.2	Y	Group II Vehicles, Precoat limit: 800 g/l or 5.0 lb/gal	SIP 8-45-501	P/W	records	N/A
VOC	BAAQMD 8-45-301.2	Y	Group II Vehicles, Pretreatment wash primer limit: 780 g/l or 6.5 lb/gal	SIP 8-45-501	P/W	records	N/A
VOC	BAAQMD 8-45-301.2	Y	Group II Vehicles, Primer sealer limit: 340 g/l or 2.8 lb/gal	SIP 8-45-501	P/W	records	N/A
VOC	BAAQMD 8-45-301.2	Y	Group II Vehicles, Primer limit: 250 g/l or 2.1 lb/gal	SIP 8-45-501	P/W	records	N/A

Title V Semi-Annual Monitoring Verification Report

**Table VI-B
Applicable Limits and Compliance Monitoring Requirements
S2 - Booth and Brush Area for Bus Component Coating Operation**

Type of Limit	Citation of Limit	FE Y/N	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance
VOC	SIP 8-45-301.2	Y	Group I Vehicles, Topcoat limit: 420 g/l or 3.5 lb/gal	SIP 8-45-501	P/W	records	N/A
VOC	BAAQMD 8-45-301.2	Y	Group II Vehicles, Metallic/iridescent topcoat limit: 420 g/l or 3.5 lb/gal	SIP 8-45-501	P/W	records	N/A
VOC	SIP 8-45-301.2	Y	Group II Vehicles, Camouflage limit: 420 g/l or 3.5 lb/gal	SIP 8-45-501	P/W	records	N/A
VOC	SIP 8-45-308.4	Y	Surface Preparation Solvent: General limit: 72 g/l or 0.6 lb/gal; Hand help spray: 780 g/l or 6.5 lb/gal	SIP 8-45-501	P/W	records	N/A
VOC	BAAQMD 8-45-312	Y	Special Coating limit: 840 g/l or 7.0 lb/gal	SIP 8-45-501	P/W	records	N/A
VOC	BAAQMD 8-45-313	Y	Temporary Protective coating limit: 60 g/l or 0.5 lb/gal	SIP 8-45-501	P/W	records	N/A
VOC	SIP 8-45-314	Y	Precoat usage limit: 25% of waterborn primer sealer	SIP 8-45-501	P/W	records	N/A
VOC	BAAQMD 8-45-301.2	Y	Group II Vehicles, Pretreatment wash primer limit: 780 g/l or 6.5 lb/gal	SIP 8-45-501	P/W	records	N/A
VOC	BAAQMD 8-45-301.2	Y	Group II Vehicles, Primer sealer limit: 340 g/l or 2.8 lb/gal	SIP 8-45-501	P/W	records	N/A