

South Coast Air Quality Management District

Statement of Basis

Proposed Title V Permit

Facility Name: 3M Company-Monrovia
Facility ID: 035188
SIC Code: 2295
Equipment Location: 1601 S. Shamrock Ave.
Monrovia, CA 91016

Application #(s): 537768
Application Submittal Date(s): 5/3/2012

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1. Introduction and Scope of Permit

Title V is a national operating permit program for air pollution sources. Facilities subject to Title V must obtain a Title V permit and comply with specific Title V procedures to modify the permit. This permit replaces the facility's other existing permits. Title V does not necessarily include any new requirements for reducing emissions. It does, however, include new permitting, noticing, recordkeeping, and reporting requirements.

The AQMD implements Title V through Regulation XXX – Title V Permits, adopted by the AQMD Governing Board in order to comply with EPA's requirement that local air permitting authorities develop a Title V program. Regulation XXX was developed with the participation of the public and affected facilities through a series of public workshops, working group meetings, public hearings and other meetings.

The Title V major source threshold for a particular pollutant depends on the attainment status of the pollutant. NO₂, SO₂, CO, and lead are in attainment with federal standards. The status for PM-10 is serious nonattainment. The status for ozone is currently extreme nonattainment. A Title V permit is proposed to be issued to cover the operations of 3M Company-Monrovia, located at 1601 S. Shamrock Ave., Monrovia, CA 91016. This facility is subject to Title V requirements because it is a major source.

2. Facility Description

This is an existing facility applying for a Title V permit that is engaged in the manufacturing of coated materials. The facility operates a dual web coating and curing line, a cured coating stripping tank, and other supporting equipment. Volatile organic compound (VOC) emissions from the dual web coating and curing line are vented to an air pollution control equipment afterburner.

3. Construction and Permitting History

The facility has been in operation at this location since 1958. Numerous permits to construct and permits to operate have been issued to this facility.

4. Regulatory Applicability Determinations

Applicable legal requirements for which this facility is required to comply are required to be identified in the Title V permit (for example, Section D, E, and H of the proposed Title V permit). Applicability determinations (i.e., determinations made by the District with respect to what legal requirements apply to a specific piece of equipment, process, or operation) can be found in the Engineering Evaluations. This facility is not subject to any NSPS requirements. The facility however, is subject to 40 CFR63 Subpart JJJJ-National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating. The NESHAP requirements are reflected in the Title V permit.

5. Monitoring and Operational Requirements

Applicable monitoring and operational requirements for which the facility is required to comply are identified in the Title V permit (for example, Section D, F, and J and Appendix B of the proposed Title V permit). Discussion of any applicable operational requirements can be found in the Engineering Evaluations. All periodic monitoring requirements were developed using strict adherence to the following applicable guidance documents: SCAQMD Periodic Monitoring Guidelines for Title V Facilities (November 1997); CAPCOA/CARB/EPA Region IX Periodic Monitoring Recommendations for Generally Applicable Requirements in SIP (June 1999); and CAPCOA/CARB/EPA Region IX Recommended Periodic Monitoring for Generally Applicable Grain Loading Standards in the SIP: Combustion Sources (July 2001).

The VOC emissions from the dual web coating and curing line are vented to an air pollution control system afterburner. The uncontrolled VOC emissions to the afterburner is greater than the major source threshold for VOC of 10 tons per year. As a result, the air pollution control equipment is subject to the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64. Permit conditions have been added to satisfy the CAM requirements. Such permit conditions were developed using the design criteria and other pertinent requirements identified in 40 CFR 64- Compliance Assurance Monitoring and Technical Guidance Document and in the August 1998 Revised Draft CAM.

6. Permit Features

Permit Shield

A permit shield is an optional part of a Title V permit that gives the facility an explicit protection from requirements that do not apply to the facility. A permit shield is a provision in a permit that states that compliance with the conditions of the permit shall be deemed compliance with all identified regulatory requirements. To incorporate a permit shield into the Title V permit involves submission of applications for change of conditions for each equipment affected by the permit shield. Permit shields are addressed in Rule 3004 (c). This facility has not applied for a permit shield.

Streamlining Requirements

Some emission units may be subject to multiple requirements which are closely related or redundant. The conditions may be streamlined to simplify the permit conditions and compliance. Emission limits, work practice standards, and monitoring, recordkeeping, and reporting requirements may be streamlined. Compliance with a streamlined condition will be deemed compliance with the underlying requirements whether or not the emission unit is actually in compliance with the specific underlying requirement. This facility has not applied for any streamlined conditions.

7. Summary of Emissions and Health Risks

Criteria Pollutant Emissions (tons/year) Annual Reported Emissions for Reporting Period 2012

Pollutant	Emissions (tons/year)
NOx	1.084
CO	0.292
VOC	5.372
PM	0.062
SOx	0.005

Toxic Air Contaminants Emissions (TAC) Annual Reported Emissions for Reporting Period 2012

The Following TACs Were Reported	Emissions (lbs/yr)
Ammonia	300
Arsenic	0.2
Benzene	7.41
Cadmium	0.2
Carbon Tetrachloride	0.003
Chromium (VI)	0.2
Formaldehyde	0.246
Lead	0.2
Naphthalene	0.227
Nickel	0.2

The Following TACs Were Reported	Emissions (lbs/yr)
PAHs	0.003
Trichloroethylene	2.822

Health Risk from Toxic Air Contaminants

The facility is subject to review by the Air Toxics Information and Assessment Act (AB2588). The AQMD is tracking the status of the facility under AB2588.

8. Compliance History

As noted, the facility has been in operation at this location since 1958. The facility has had no citizen complaints filed, or Notices to Comply or Notices of Violation issued in the last two years. The facility is currently operating in compliance with all applicable rules and permit conditions.

9. Compliance Certification

By virtue of the Title V permit application and issuance of this Title V renewal permit, the reporting frequency for compliance certification for the facility shall be annual.