

South Coast Air Quality Management District

Statement of Basis

Proposed Title V Renewal Permit

Facility Name:	Old Country Millwork, Inc.
Facility ID:	089248
SIC Code:	3355
Equipment Location:	1212 E. 58 th Place Los Angeles, CA 90001
Application #(s):	571184
Application Submittal Date(s):	12/19/14
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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.

Pursuant to Title V of the federal Clean Air Act and SCAQMD Rule 3004(f), a Title V permit shall expire five years from the date of issuance unless such permit has been renewed. Accordingly, each facility is required to submit a Title V renewal application and requested the SCAQMD to renew their Title V permit. The proposed permit incorporates updates to the facility information provided in the facility's Title V renewal application and all rules and regulations that are currently applicable to the facility.

The SCAQMD implements Title V through Regulation XXX – Title V Permits, adopted by the SCAQMD 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, and CO are in attainment with federal standards. The status of lead is

nonattainment. The status for PM-10 is serious nonattainment. The status for ozone is currently extreme nonattainment.

A Title V renewal permit is proposed to be issued to cover the operations of Old Country Millwork, Inc located at 1212 E. 58th Place, Los Angeles, CA 90001. This facility is subject to Title V requirements because it is a major source.

2. Facility Description

This is an existing facility that is in the business of coil coating of metal. The facility operates coating and drying lines, and other supporting equipment. Volatile Organic Compound (VOC) emissions from the coaters and ovens are vented to an air pollution control equipment regenerative thermal oxidizer.

3. Construction and Permitting History

The facility has been in constant operation with a Title V permit at this location since 1999. Numerous permits to construct and or permits to operate have been issued to the facility since September 1999. A Title V renewal permit was issued to the facility on July 6, 2010.

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 subject to the requirements of 40CFR60 Subpart TT-Standards of Performance for Metal Coil Surface Coating. The facility complies with the NSPS by meeting the VOC emission limit of 0.14 kg/L of coating solids applied. This is achieved by venting the emissions to a regenerative thermal oxidizer. The requirements of the NSPS are specified in the permit.

The facility is not subject to any NESHAP requirements. To ensure that the facility is exempt from the requirements of 40 CFR 63 Subpart SSSS-National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Coil, facility wide permit conditions are specified in the Title V permit limiting the quantity of a volatile hazardous air pollutant emissions (VHAP) from the facility to less than 10 tons per year and a combination of VHAPs to less than 25 tons per year.

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).

VOC emissions from the two coating and drying lines are vented to an air pollution control system regenerative thermal oxidizer. The uncontrolled VOC emissions to the oxidizer 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 2015**

Pollutant	Emissions (tons/year)
NO _x	0.556
CO	0.149
VOC	9.949
PM	0.032
SO _x	0.002

**Toxic Air Contaminants Emissions (TAC)
Annual Reported Emissions for Reporting Period 2014**

The Following TACs Were Reported	Emissions (lbs/yr)
Ammonia	27.4
Benzene	0.068
Formaldehyde	0.145
Naphthalene	0.002

Health Risk from Toxic Air Contaminants

The facility is subject to review by the Air Toxics Information and Assessment Act (AB2588). The facility is determined to be exempt from AB2588 requirements.

8. Compliance History

As noted, the facility has been in constant operation with a Title V permit since 1999. The facility has been subject to both self-reporting requirements and SCAQMD inspections. The facility has had no citizen complaints filed, 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 regulations.

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.