

<b>SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</b>  <b>E &amp; C DIVISION</b>  <b>APPLICATION PROCESSING AND CALCULATIONS</b>	TOTAL PAGES:	PAGE NO.:
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**PERMIT TO CONSTRUCT/OPERATE**

APPLICANT	DISNEYLAND RESORT
MAILING ADDRESS	1313 HARBOR BLVD ANAHEIM, CA. 92803
EQUIPMENT LOCATION	SAME

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions and Requirements	Conditions
<b>PROCESS 2: EXTERNAL COMBUSTION, BOILERS, INDUSTRIAL</b>					
BOILER, PRESSURE WASHER TYPE, PORTABLE, DIESEL FUEL, ALKOTA, MODEL NO. 7205, S/N 263757, WITH A 20 HP GASOLINE-FUELED, ICE DRIVING A PUMP, RATED AT 352,800 BTU/HR. A/N 533625	D343			CO: 2000 PPMV (5A) [RULE 407, 4-2-1982]; NOX: 19 LBS/1000 GAL DIESEL (1) [RULE 2012, 5-6-2005]; NOX: 102 LBS/1000 GAL GASOLINE (1) [RULE 2012, 5-6-2005]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]	B59.2, C1.31 C1.32, K67.26
BOILER, PRESSURE WASHER TYPE, PORTABLE, DIESEL FUEL, ALKOTA, MODEL NO. 7205, S/N 263758 WITH 20 HP GASOLINE-FUELED, ICE DRIVING A PUMP, RATED AT 352,800 BTU/HR. A/N 533627	D344			CO: 2000 PPMV (5A) [RULE 407, 4-2-1982]; NOX: 19 LBS/1000 GAL DIESEL (1) [RULE 2012, 5-6-2005]; NOX: 102 LBS/1000 GAL GASOLINE (1) [RULE 2012, 5-6-2005]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]	B59.2, C1.31, C1.32, K67.26
BOILER, PRESSURE WASHER TYPE, PORTABLE, DIESEL FUEL, Mi-T-M, MODEL NO. GH-2403-3MGH, S/N 1565395 WITH 6.5 HP GASOLINE-FUELED ICE DRIVING A PUMP, RATED AT 210,000 BTU/HR. A/N 533928	D345			CO: 2000 PPMV (5A) [RULE 407, 4-2-1982]; NOX: 19 LBS/1000 GAL DIESEL (1) [RULE 2012, 5-6-2005]; NOX: 102 LBS/1000 GAL GASOLINE (1) [RULE 2012, 5-6-2005]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]	B59.2, C1.31, C1.32, K67.26

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<b>PROCESS 2: EXTERNAL COMBUSTION, BOILERS, INDUSTRIAL</b>					
ABRASIVE BLASTING, CARBON DIOXIDE (DRY ICE), COLDJET, MODEL AERO 40, WITH 40 POUND CAPACITY POT WITH AN A/N 533929	D346			PM: (9) [RULE 1140, 2-1-1980; RULE 1140, 8-2-1985; RULE 405, 2-7-1986]	B59.1, C1.34, C6.3, H23.5, K67.11, K27.28
ABRASIVE BLASTING NOZZLE, WITH A MAX. INNER DIA OF 0.1875 IN, 80 PSI					
ABRASIVE BLASTING, CARBON DIOXIDE (DRY ICE), COLDJET, MODEL 71L1-G1, WITH 40 POUND CAPACITY POT WITH AN A/N 533931	D347			PM: (9) [RULE 1140, 2-1-1980; RULE 1140, 8-2-1985; RULE 405, 2-7-1986]	B59.1, C1.34, C6.3, H23.5, K67.11, K27.28
ABRASIVE BLASTING NOZZLE, WITH A MAX. INNER DIA OF 0.25 IN, 80 PSI					
ABRASIVE BLASTING, CARBON DIOXIDE (DRY ICE), CAE ALPHEUS, MODEL PLT-5, WITH 40 POUND CAPACITY POT WITH AN A/N 533932	D348			PM: (9) [RULE 1140, 2-1-1980; RULE 1140, 8-2-1985; RULE 405, 2-7-1986]	B59.1, C1.34, C6.4, H23.5, K67.11, K27.28
ABRASIVE BLASTING NOZZLE, WITH A MAX. INNER DIA OF 0.667 IN, 100 PSI					
STORAGE SILO, FLOUR, 9.75 FT. DIA X 19 FT. H., WITH A BIN VENT, TWENTY FIVE FILTER VENTS A/N 533923	D349			PM: (9) [RULE 404, 2-7-1986; RULE 405, 2-7-1986]	B59.4, C1.33, D381.2, E57.1, E102.2, H23.12

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**A/N 533921**

RECLAIM/TITLE V PERMIT REVISION, DE MINIMIS SIGNIFICANT

**BACKGROUND:**

These applications were filed on 11/02//2011 as Class I for the installation of three pressure washers, 3 portable abrasive blasting machines using dry ice (carbon dioxide) as blasting media. The facility also filed application for an existing flour silo operating without a permit. The pressure washers are equipped with small Rule 219 exempt engines used to drive a pump. The silo has bin filter vents (no blower) to control PM emissions during filling.

This Title V modification is considered as a “de minimus significant revision” to the Title V permit because the emissions do not exceed the threshold levels described District Rule 3000 (b)(6)- see Rule 212 section.

**PROCESS DESCRIPTION**

These portable high-pressure washers will be used to clean patios and walkways in the theme park. The burner is used to heat the water and soap to the correct operating temperature. Afterwards, the solution is sprayed through a nozzle at high pressure.

The silo is used to store flour used at the restaurants in the park. The flour is conveyed to the silo pneumatically from the trucks. Bin filter vents atop the silo minimize the dust generated during filling into the atmosphere.

The portable unconfined abrasive blasting unit is used to blast large sections of rail and roller coaster tracks at its permanent location during maintenance. Dry ice (Carbon Dioxide) is used as blasting media.

**CALCULATIONS**

**1. EMISSIONS CALCULATIONS FROM PRESSURE WASHERS**

Diesel- 532,000 btu/hr

Max burner rating	532,000	BTU/hr
heating value	135,000	btu/gal
ft <sup>3</sup> /hr	3.94	gal/hr
dy/wk	7.00	
wk/yr	52.00	
Max hr/dy	8	hr/day

Emissions factors

NOx	20	lb/mgal
ROG	1.32	lb/mgal
CO	5	lb/mgal
SOx	0.1065	lb/mgal
PM=PM10	2	lb/mgal

Ref SCAQMD emissions fee form B1,

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	lb/hr	lb/day	30-dy ave	lb/yr
RHC	0.005202	0.0416	0.04	15.1
NO <sub>x</sub>	0.078815	0.6305	0.64	229.5
SO <sub>x</sub>	0.00042	0.0034	0.00	1.2
CO	0.019704	0.1576	0.16	57.4
PM=PM <sub>10</sub>	0.0079	0.0631	0.06	23.0

Diesel- 210,000 btu/hr

Max burner rating	210,000	BTU/hr
heating value	135,000	btu/gal
ft <sup>3</sup> /hr	1.56	gal/hr
dy/wk	7.00	
wk/yr	52.00	
Max hr/dy	8	hr/day

Emissions factors

NO <sub>x</sub>	20	lb/mgal
ROG	1.32	lb/mgal
CO	5	lb/mgal
SO <sub>x</sub>	0.1065	lb/mgal
PM=PM <sub>10</sub>	2	lb/mgal

Ref SCAQMD emissions fee form B1,

	lb/hr	lb/day	30-dy ave	lb/yr
RHC	0.002053	0.0164	0.02	6.0
NO <sub>x</sub>	0.031111	0.2489	0.25	90.6
SO <sub>x</sub>	0.000166	0.0013	0.00	0.5
CO	0.007778	0.0622	0.06	22.6
PM=PM <sub>10</sub>	0.0031	0.0249	0.03	9.1

EMISSIONS CALCULATIONS FROM EACH NEW GASOLINE ENGINE PUMP ASSOCIATED WITH THE WASHERS USING FUEL RATE OF 2.2 GAL/HR (0.11 GAL/HP-HR \* 20 HP) AND EMISSIONS FACTORS FROM FORM B-1, 1990.

	lb/hr	lb/day	30-dy ave	lb/yr
RHC	0.4532	4.5320	3.92	1414.0
NO <sub>x</sub>	0.2244	2.2440	1.94	700.1
SO <sub>x</sub>	0.01166	0.1166	0.10	36.4
CO	8.668	86.6800	75.06	27044.2
PM=PM <sub>10</sub>	0.0143	0.1430	0.12	44.6

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EMISSIONS CALCULATIONS FROM NEW GASOLINE ENGINE PUMP ASSOCIATED WITH THE WASHER USING FUEL RATE OF 0.715 GAL/HR (0.11 GAL/HP-HR \* 6.5 HP) AND EMISSIONS FACTORS FROM FORM B-1, 1990.

	lb/hr	lb/day	30-dy ave	lb/yr
RHC	0.14729	1.47	1.49	536
NO <sub>x</sub>	0.07293	0.73	0.74	265
SO <sub>x</sub>	0.00379	0.04	0.04	14
CO	2.8171	28.17	28.46	10254
PM=PM <sub>10</sub>	0.0046	0.05	0.05	17

2. Emissions Calculations from Abrasive Blasting

Given (Common to all 3):

Abrasive (Dry Ice) Density, lbs/cu. ft. : 160 lbs/ft<sup>3</sup>  
Abrasive (Sand) Density, lbs/cu. ft. : 100 lbs/ft<sup>3</sup>  
Abrasive Emission Factor : 0.01 lb/lb  
No. of nozzle : 1  
Use Factor : Dry 60% (i.e. 0.6)  
Given : PM10 = 50% of PM (Assumed)

OPERATING HOURS

Average: 8 hr/day, 2 day/week, 2 weeks/year  
Maximum: 8 hr/day, 2 day/week, 2 weeks/year

A/no. 523929

For Nozzle diameter of 3/16" operating at 80 psi, the flow rate is:

$$\text{Flow Rate- Dry Ice (FR)} = \frac{\text{FR (sand)} \times \text{id (Dry Ice)} \times \text{density (Dry Ice)}}{\text{Id (Sand)} \times \text{density (Sand)}}$$

$$\text{FR} = \frac{135 \times 0.375 \times 160}{0.375 \times 100}$$

$$\text{FR} = 216 \text{ lb/hr}$$

Max./Avg. Uncontrolled PM emissions (R1=R2)

PM Emission factor (EF) = 0.01 lb/lb abrasive  
FR= 216 lb/hr

$$\text{PM} = \text{FR} \times \text{EF} \times \text{Use Factor}$$

$$\text{PM} = 216 \times 0.01 \times 0.6$$

$$= 1.3 \text{ lbs/hr} \times 8 \text{ hrs/day} = 10.4 \text{ lb/day} \times 2 \text{ days/week} \times 2 \text{ weeks/yr} = 41 \text{ lb/yr.}$$

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Max./Avg. Uncontrolled PM10 emissions (R1=R2)

$$0.5 \times \text{PM} = 0.5 \times 1.3 = 0.65 \text{ lbs/hr} \times 8 \text{ hrs/day} = 5 \text{ lb/day} \times 2 \text{ days/week} \times 2 \text{ weeks/yr} = 20 \text{ lb/yr.}$$

$$30\text{-day Ave.} = \frac{0.65 \text{ lbs/hr} \times 30 \text{ hrs/mo}}{30 \text{ days/month}} = 0.65 \text{ lb/day}$$

A/no. 523931

For Nozzle diameter of 1/4" operating at 80 psi, the flow rate is:

$$\text{Flow Rate- Dry Ice (FR)} = \frac{\text{FR (sand)} \times \text{id (Dry Ice)} \times \text{density (Dry Ice)}}{\text{Id (Sand)} \times \text{density (Sand)}}$$

$$\text{FR} = \frac{255 \times 0.25 \times 160}{0.25 \times 100}$$

$$\text{FR} = 408 \text{ lb/hr}$$

Max./Avg. Uncontrolled PM emissions (R1=R2)

PM Emission factor (EF) = 0.01 lb/lb abrasive  
FR = 408 lb/hr

$$\text{PM} = \text{FR} \times \text{EF} \times \text{Use Factor}$$

$$\text{PM} = 408 \times 0.01 \times 0.6$$

$$= 2.4 \text{ lbs/hr} \times 8 \text{ hrs/day} = 20 \text{ lb/day} \times 2 \text{ days/week} \times 2 \text{ weeks/yr} = 80 \text{ lb/yr.}$$

Max./Avg. Uncontrolled PM10 emissions (R1=R2)

$$0.5 \times \text{PM} = 0.5 \times 2.4 = 1.2 \text{ lbs/hr} \times 8 \text{ hrs/day} = 9.6 \text{ lb/day} \times 2 \text{ days/week} \times 2 \text{ weeks/yr} = 38 \text{ lb/yr.}$$

$$30\text{-day Ave.} = \frac{1.2 \text{ lbs/hr} \times 30 \text{ hrs/mo}}{30 \text{ days/month}} = 1.2 \text{ lb/day}$$

A/no. 523932

For Nozzle diameter of 2/3" operating at 100 psi, the flow rate is:

$$\text{Flow Rate- Dry Ice (FR)} = \frac{\text{FR (sand)} \times \text{id (Dry Ice)} \times \text{density (Dry Ice)}}{\text{Id (Sand)} \times \text{density (Sand)}}$$

$$\text{FR} = \frac{2166 \times 0.375 \times 160}{0.375 \times 100}$$

$$\text{FR} = 3466 \text{ lb/hr}$$

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Max./Avg. Uncontrolled PM emissions (R1=R2)

PM Emission factor (EF) = 0.01 lb/lb abrasive  
FR= 3466 lb/hr

PM = FR x EF x Use Factor

PM = 3466 x 0.01 x 0.6

= 20.8 lbs/hr x 8 hrs/day = 166 lb/day x 2 days/week x 2 weeks/yr = 665 lb/yr.

Max./Avg. Uncontrolled PM10 emissions (R1=R2)

0.5 X PM = 0.5 X 20.8 = 10.4 lbs/hr x 8 hrs/day = 83 lb/day x 2 days/week x 2 weeks/yr = 333 lb/yr.

30- day Ave. =  $\frac{10.4 \text{ lbs/hr} \times 30 \text{ hrs/mo}}{30 \text{ days/month}}$  = 10.4 lb/day

Flour Storage Silo:

Based on district emission factor of 1 lb PM/1000 lb material charged and a throughput rate of 600 lb/hr, and it takes 500 minutes (8.33 hrs) to fill up the silo, the emissions are:

R1: 1 lb PM/1000 lb material x 6000 lb/hr = 6.0 lb/hr x 8.33 hrs/day x 1 days/week x 52 weeks/yr = 2,600 lb/yr.

R2: 6.0 lb/hr x 0.01 = 0.06 lb/hr x 8.33 hrs/day x 1 day/week x 52 weeks/yr = 26 lb/yr.

30- day Ave. =  $\frac{0.06 \text{ lbs/hr} \times 8.33 \text{ hrs/day} \times 1 \text{ days/week} \times 4 \text{ wks/mo}}{30 \text{ days/month}}$  = 0.06 lb/day

Silo monthly throughput limit:

6000 lb/hr x 8.33 hrs/day x 1 day/week x 4 weeks/month = 200,000 lb/month x 1 ton/2000 lbs = 100 tons/month

Rule 404:

Density of Flour: 528 g/l = 32.9 lb/cu. Ft.

Flour thru'put rate : 600 lb/hr or 3600 lb/min

Flour flow rate = 3600 lb/min x cu.ft/32.9 lb = 109 cfm

Exhaust Air Particulate Emission Concentration (PC)

= R2 / Blower CFM x 7,000 grain/lb / 60 min/hr

= 0.06 / 109 CFM x 7000 /60 = 0.06 grain/cfm

The rule allows 0.196 grain/cfm for flow rate below 883 CFM.

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**RULES EVALUATION:**

Rule 212. The equipment is not located within 1,000 feet of a school, thus Public notice is not required. The total MICR for the pressure washers will be less than one-in-a million. The emissions from the equipment will not exceed the daily maximum specified in subdivision (g) of this Rule. Therefore, a Rule 212 (g) public notice is not required for this project.

Section (c)(3)(A)(i)

A/no.	Device	MICR (Resi.)
533925	D343	2.64 E-07
533927	D344	2.64 E-07
533928	D345	1.58 E-07

Section (g)

Item	Net increase in emissions lb/dy (from the project)	Allow limit-lb/dy	Trigger Public notice
NOx	+1.55	40	No
ROG	+0.1	30	No
CO	+0.38	220	No
PM10	+12.4	30	No
SOx	+0	60	No

- Rule 401: Visible emissions are not expected with proper operation of this equipment. The open abrasive blasting operation are exempt from the requirements of this rule per 401(c)(1)(B).
- Rule 402: With proper operation, this equipment is not expected to create a public nuisance.
- Rule 404: Storage Silo: The rule allows 0.196 grain/cfm for flow rate below 883 CFM. As per calculations above, at 109 cfm, the concentration is 0.06 grain/cfm. Therefore, compliance is expected with this rule.
- Rule 405: Storage Silo: As per the table in the rule, for a process weight of 600 lb/hr, the maximum allowable PM discharge rate is about 1.88 lb/hr. Since the controlled PM emissions are 0.006 lb/hr from the silo, compliance is achieved for this rule.
- Rule 431.2: Complies, using low sulfur diesel fuel. Effective 6/1/2004 the applicant is required to purchase ultra low sulfur diesel (15 ppm S)
- Rule 1140: Rule 1140 (b)(6) requires confined abrasive blasting to be conducted to clean parts except if the article to be cleaned is at its permanent location. The applicant will be using the abrasive blasting equipment to clean sections of rail and roller coaster at its permanent location and therefore satisfies the requirements of Rule 1140 (b)(6)(c). In addition, the abrasive media used in this equipment is certified by CARB. Compliance with this rule is expected

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- Rule 1146.1 Does not apply as the units as less than 2 MM btu/hr each.
- Rule 1146.2 This rule is only applicable to Natural gas fired boilers. Since these washers are diesel fueled, the rule is not applicable.
- Rule 1147: Per section (g) of the rule, the provisions of this rule shall not apply to units located at a RECLAIM facility.
- Rule 1155: Silo- This rule prohibits visible emissions from the PM control devices. Visible emissions are not expected. The control devices are required to operate and maintained per manufacturer's specifications. The bin vent filter will operate and maintained per manufacturer's specifications. Also, Bin vent filter is exempt from monitoring requirements under section (e) (1) of this rule. The rule requires dust collected from the air pollution control unit to be discharged into closed containers. Therefore, compliance with this rule is expected.
- Reg. XIII Compliance with the following sections is anticipated.
- 1303 (a)-BACT- At 8 hr/dy the max emissions from the washer will not exceed one pound per day. Therefore, BACT does not apply. A permit condition will be included to limit the operation of the washers to less than 8 hours/day. The silo is vented to the filter vent which constitutes as BACT. For unconfined blasting, using CARB certified abrasive media constitutes as BACT.

1303 (b)(1)- Modeling, Screen Table A-1

Combustion

Pollutant	Emissions rate (lb/hr)		Compliance
	Allowed	calculated	
NOx	0.2	0.08	Yes
CO	11.0	0.02	Yes
PM10	1.2	0.01	Yes

Silo

Pollutant	Emissions rate (lb/hr)		Compliance
	Allowed	calculated	
PM10	0.41	0.06	Yes

Open Abrasive Blasting operation are exempt from the modeling requirements per 1304(a)(3).

1303 (b)(2)-Offsets, 30 day ave.

Device	ROG	NOx	SOx	CO	PM10
	lb/dy	lb/dy	lb/dy	lb/dy	lb/dy
D343	0.04	0.64	0.16	0.16	0.06
D344	0.04	0.64	0.16	0.16	0.06
D345	0.02	0.25	0	0.06	0.03
D346					0.65

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Device	ROG	NOx	SOx	CO	PM10
D347					1.2
D348					10.4
D349					0.02
Total	0.1	1.55	0.32	0.38	12.4

The 30 day ave for ROG, SOx and PM10 for washers and silo are below 0.50 lb/dy, thus rule 1303 does not apply. The portable abrasive blasting operation (D 346-348) is exempt from modeling & offsets as per Rule 1304 (a) (3). For the NOx emissions from the boilers, the facility is in RECLAIM and the applicant has ample RTCs to cover the NOx emissions

RULE 1401-Complies, risks less than 1 in a million using Tier 2 per permit unit (see calculation sheet for detail calculations), summary is listed below:

Item	Device	MICR	HIA	HIC
533925	D343	2.64 E-07	0.005	0.372
533927	D344	2.64 E-07	0.005	0.372
533928	D345	1.58 E-07	0.003	0.22
Compliance		YES	YES	YES

Reg.2005 Compliance with the following sections is anticipated.

2005 (c)(1)(A)-BACT: The max daily NOx limited to less than one pound per day, BACT does not apply

2005 (c)(1)(B)- The operation of the source will not result in a significant increase in the air quality concentration for NO2 as specified in Appendix A.

Pollutant	Emissions rate (lb/hr)		Compliance
	Allowed	calculated	
NOx	0.2	0.05	Yes

2012 -See the table below

Equipment	Rule section large source or process unit	Section-emissions factor or concentration limit	type	value
New boilers (space heater and pressure washer)	(e)(1)(A)(iii)	(e)(2)(C)	Emissions factor	19 lb/mgal

Per section (e)(2)(A) there will be timers installed on each equipment.

RULE 2005(c)(2): Disneyland holds sufficient RTCs to offset the NOx emission increase of 336 lb/yr.

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RULE 2005(g)(1): Statewide compliance certification is not required since Disneyland does not own or operate any other major stationary sources in the state.

RULES 2005(g)(2) & 2005(g)(3): The proposed project is exempt from CEQA according to the responses Disneyland provided on Form 400-CEQA for this project. Their responses in "Review of Impacts Which May Trigger CEQA" on Form 400-CEQA were all marked "No".

RULE 2005(g)(4): A modeling analysis for plume visibility is not required since the net emission increase from the proposed project does not exceed 40 ton/yr of NOx.

**REGULATION XXX:**

This facility is in the RECLAIM program. The proposed project is considered as a "de minimis significant permit revision" for non-RECLAIM pollutants or hazardous air pollutants (HAPs), and a "minor permit revision" for RECLAIM pollutants to the RECLAIM/Title V permit for this facility.

Non-RECLAIM Pollutants or HAPs

Rule 3000(b)(6) defines a "de minimis significant permit revision" as any Title V permit revision where the cumulative emission increases of non-RECLAIM pollutants or HAPs from these permit revisions during the term of the permit are not greater than any of the following emission threshold levels:

Air Contaminant	Daily Maximum (lbs/day)
HAP	30
VOC	30
NOx*	40
PM <sub>10</sub>	30
SOx*	60
CO	220

\* Not applicable if this is a RECLAIM pollutant

To determine if a project is considered as a "de minimis significant permit revision" for non-RECLAIM pollutants or HAPs, emission increases for non-RECLAIM pollutants or HAPs resulting from all permit revisions that are made after the issuance of the Title V renewal permit shall be accumulated and compared to the above threshold levels. This proposed project is the 1st permit revision to the Title V renewal permit issued to this facility on July 17, 2012. The following table summarizes the cumulative emission increases resulting from all permit revisions since the Title V renewal permit was issued:

Revision	HAP	VOC	NOx*	PM10	SOx	CO
1st Permit Revision, Installation of new pressure washers, abrasive blasting machines, & storage silo	0	0.1	1.55	12.4	0.32	0.38
Cumulative Total	0	0	2	12	0	0
Maximum Daily	30	30	40*	30	60	220

\* RECLAIM pollutant, not subject to emission accumulation requirements

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Since the cumulative emission increases resulting from all permit revisions are not greater than any of the emission threshold levels, this proposed project is considered as a “de minimis significant permit revision” for non-RECLAIM pollutants or HAPs.

RECLAIM Pollutants

Rule 3000(b)(12)(A)(v) defines a “minor permit revision” as any Title V permit revision that does not result in an emission increase of RECLAIM pollutants over the facility starting Allocation plus nontradeable Allocations, or higher Allocation amount which has previously undergone a significant permit revision process.

Since NOx is a RECLAIM pollutant for this facility, a separate analysis shall be made to determine if the proposed permit revision is considered a “minor permit revision” for RECLAIM pollutants. The proposed project is expected to result in an increase of 1.55 lb/day (566 lbs/year) of NOx emissions from this permit revision, which is less than the starting Allocation plus the non-tradable Allocations. As a result, this proposed project is considered as a “minor permit revision” for RECLAIM pollutants.

RECOMMENDATION

The proposed project is expected to comply with all applicable District Rules and Regulations. Since the proposed project is considered as a “de minimis significant permit revision” for non-RECLAIM pollutants or hazardous air pollutants (HAPs) and “minor permit revision” for RECLAIM pollutants, it is exempt from the public participation requirements under Rule 3006(b). A proposed permit incorporating this permit revision will be submitted to EPA for a 45-day review pursuant to Rule 3003(j). If EPA does not have any objections within the review period, a revised Title V/RECLAIM permit will be issued to this facility with permit conditions:

**PERMIT CONDITIONS**

1. 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.
2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.

PRESSURE WASHERS

1. The operator shall only use the following material(s) in this device :  
Diesel fuel or bio-diesel  
[B59.2]
2. The operator shall limit the operating time to no more than 8 hour(s) in any one day.

To comply with this condition, the operator shall install and maintain a(n) non-resettable elapsed time meter to accurately indicate the elapsed operating time of the pressure washer.  
[C1.31]

3. The operator shall limit the operating time to no more than 240 hour(s) in any one month.  
[C1.32]
4. The operator shall install and maintain a(n) timer to accurately indicate the elapsed

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operating time of the pressure washer.  
[D12.8]

5. The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):  
Operating time records as required per conditions C1.31 and C1.32. The records shall be kept for at least five years and made available to District personnel upon request  
[K67.26]

**ABRASIVE BLASTING**

3. The operator shall only use the following material(s) in this device:  
Dry Ice  
[B59.1]
4. The operator shall limit the operating time to no more than 30 hour(s) in any one month.  
To comply with this condition, the operator shall install and maintain a(n) non-resettable elapsed time meter to accurately indicate the elapsed operating time of the blasting nozzle.  
[C1.34]
5. The operator shall use this equipment in such a manner that the pressure being monitored, as indicated below, does not exceed 80 psi.

To comply with this condition, the operator shall install and maintain a(n) pressure gauge to accurately indicate the pressure at the air supply line to the blasting nozzle.

6. This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
PM	District	Rule 1140

  
[H23.5]
7. The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):  
Copy of MSDS shall be kept for the abrasive material used in this equipment  
[K67.11]
8. The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):  
Operating time records as required per conditions C1.33. The records shall be kept for at least five years and made available to District personnel upon request  
[K67.27]

**STORAGE SILO**

3. This equipment shall not be operated unless it is vented only to air pollution control equipment which is in full use and which has been issued a permit to operate by the executive officer.  
[E57.1]

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4. Dust collected in the Bin filter vent shall be discharged only into closed containers and shall not be handled in a manner that may result in the re-release of collected materials to the atmosphere.  
[E102.2]

5. The total amount of flour loaded in this silo shall not exceed 100 tons in any one month.  
[C1.33]

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

Monthly amount of flour loaded in the silo

The records shall be kept for at least five years and made available to District personnel upon request  
[K67.27]

7. The operator shall only use the following material(s) in this device:  

Flour

[B59.1]

8. 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, the operator shall 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.  
The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:  
1). Stack or emission point identification;  
2). Description of any corrective actions taken to abate visible emissions; and  
3). Date and time visible emission was abated.  
[D381.2]

9. This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	rule		rule/subpart
pm	district rule	1155	