



**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
ENGINEERING AND COMPLIANCE DIVISION**

Coating, Printing, Aerospace & Metal Finishing Team

PERMIT APPLICATION EVALUATION

Page 1 of 6
A/Ns 495585
Processed by: WW
Reviewed by: SMKE
Date 12/18/09

PERMIT TO OPERATE
Modification to Metal Finishing Line

APPLICANT:	Ducommun Aerostructures, Inc.
FACILITY ID:	140811
EQUIPMENT LOCATION	801 Royal Oaks Drive, Monrovia, CA 91016
MAILING ADDRESS :	801 Royal Oaks Drive, Monrovia, CA 91016

EQUIPMENT DESCRIPTION

A/N 493017

TITLE V PERMIT REVISION

A/N495585

MODIFICATION TO AN EXISTING METAL FINISHING LINE (PERMIT NO. F71734) TO CORRECT THE TANK DESCRIPTIONS AND ADD 4 SMALL TANKS PREVIOUSLY EXEMPT.

The equipment description will be updated and will read:

METAL FINISHING LINE CONSISTING OF:

1. TANK NO. 3242-4 (BLDG. U), CHEMICAL ETCH, HYDROCHLORIC ACID, 2'-6" W. x 24'-0" L. x 3'-0" D., HEATED WITH 10 KW ELECTRIC HEATER, VENTED TO AIR POLLUTION CONTROL EQUIPMENT.
2. TANK NO. 3242-26 (BLDG U), CHEMICAL ETCH, SULFURIC ACID, 2'-6" W. x 4'-11" L. x 4'-0" D., HEATED WITH 9 KW ELECTRIC HEATER, VENTED TO AIR POLLUTION CONTROL EQUIPMENT.
3. TANK NO. 3242-15 (BLDG U), PICKLE, NITRIC ACID, 4'-6" W. x 10'-0" L. x 1'-6" D., HEATED WITH 1.5 KW ELECTRIC HEATER, VENTED TO AIR POLLUTION CONTROL EQUIPMENT.
4. TANK NO. 3242-31 (BLDG U), STRIP, NITRIC ACID, 2'-0" W. x 4'-11" L. x 4'-0" D., HEATED WITH 9 KW ELECTRIC HEATER, VENTED TO AIR POLLUTION CONTROL EQUIPMENT.



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ENGINEERING AND COMPLIANCE DIVISION**

Coating, Printing, Aerospace & Metal Finishing Team

PERMIT APPLICATION EVALUATION

Page 2 of 6
A/Ns 495585
Processed by: WW
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5. TANK NO. 3242-33 (BLDG U), PASSIVATION, NITRIC ACID, 0'- 11" W. x 4'-11" L. x 4'-0" D., HEATED WITH 4.5 KW ELECTRIC HEATER, VENTED TO AIR POLLUTION CONTROL EQUIPMENT.
6. TANK NO. 3242-27 (BLDG U), ETCH, SULFURIC ACID, 3'-0" W. x 20'-0" L. x 3'-0" D., HEATED WITH 49.5 KW ELECTRIC HEATER, VENTED TO AIR POLLUTION CONTROL EQUIPMENT.
7. TANK NO. 3242-24 (BLDG U), DESMUTTING, SULFURIC ACID, 0'-11" W. x 4'-11" L. x 4'-0" D., HEATED WITH 12 KW ELECTRIC HEATER, VENTED TO AIR POLLUTION CONTROL EQUIPMENT.
8. TANK NO. 3242-34 (BLDG U), NITRIC ACID, SULFURIC ACID AND AMMONIUM BIFLUORIDE, 2'-1" W. x 1'-7" L. x 2'-8" D., UNHEATED, COVERED.
9. TANK NO. 3242-35 (BLDG U), NITRIC ACID AND HYDROFLUORIC ACID, 1'-8" H. x 4'-2" D., UNHEATED, COVERED.
10. TANK NO. 3242-37 (BLDG U), NITRIC ACID, 1'-8" H. x 4'-2" D., UNHEATED, COVERED.
11. TANK NO. 3242-36 (BLDG U), NITRIC ACID, 2'-1" W. x 1'-7" L. x 2'-8" D., UNHEATED, COVERED.

BACKGROUND:

Ducommun Aerostructures, Inc. (DAI) is an aerospace contractor whose primary operations involve the manufacture and coating of aerospace components. A/N 495585 was received on 1/3/09 for a metal finishing line to update the tanks description and include 4 acid tanks that were previously exempt. These tanks are small and are not vented to the scrubber. They use them once or twice a month. The rest of the tanks are vented to a scrubber. This metal finishing line thoroughly cleans small parts of aircraft wings before bonding together.

The processing engineer, Wilma Wilson visited the site 12/15/09 and met with the company's Environmental Health and Safety Manager, Philip Tamayo to see the metal processing line, get the updated info on each tank and MSDS for the chemicals used in the tanks. The line was not operating that day, they lost a lot of government contracts and they are in the process of reorganizing. They will shut down for two weeks in December for inventory and cleaning. They changed some of the tanks numbers but otherwise same permit description, operating conditions and materials used in the facility.



**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
ENGINEERING AND COMPLIANCE DIVISION**

Coating, Printing, Aerospace & Metal Finishing Team

PERMIT APPLICATION EVALUATION

Page 3 of 6
A/Ns 495585
Processed by: WW
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DAI is a Title V facility. A Title V permit renewal was issued to this facility on July 28, 2008. This proposed project is the 1st permit revision to the Title V permit renewal. This revision also includes the addition of one oven and change of conditions on four spray booths that have been evaluated separately.

EMISSION CALCULATION:

Operation of the metal finishing line generates a small quantity of PM and PM₁₀ emissions. From the attached spreadsheet, there are only evaporative losses, a total of 0.246 lb/day PM₁₀ maximum, due to the addition of four process tanks to the metal finishing line.

Increase R1 = R2 = 0.246 lb/day PM₁₀

Operating schedule: 24 hrs/day, 7 days/wk, 52 wks/yr (maximum)

RULE EVALUATION

RULE 212(c)(1) *This section requires a public notice for all new and modified permit units that may emit air contaminants located within 1,000 feet from the outer boundary of a school.*

Immaculate Conception School (K-8) is within 1,000 feet of the facility therefore public notice will be required by this section.

RULE 212(c)(2) *This section requires a public notice for all new and modified facilities which have on-site emission increases exceeding any of the daily maximums specified in subdivision (g).*

There is no emission increase over the thresholds (only PM₁₀ < 0.5 lb/day), therefore; public notice will not be required by this section.

RULE 212(c)(3) *This section requires a public notice for all new or modified permit units with increases in emissions of toxic air contaminants listed in Table I of Rule 1401 resulting in MICR greater than 1E⁻⁶ per permit unit or greater than 10E⁻⁶ per facility.*

There are no carcinogenic compound emissions from this project. A small amount of a toxic contaminant listed in Rule 1401 as amended 3/7/08 will be emitted; however, the calculations show that the proposed project complies



**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
ENGINEERING AND COMPLIANCE DIVISION**

Coating, Printing, Aerospace & Metal Finishing Team

PERMIT APPLICATION EVALUATION

Page 4 of 6
A/Ns 495585
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with all applicable R1401 requirements. Public notice will not be required per this section.

RULE 212(g) *This section requires a public notice for all new and modified sources that have equipment emission increases exceeding any of the daily maximums as specified by Rule 212 (g).*

There is no emission increase over the thresholds (only $PM_{10} < 0.5$ lb/day), therefore; public notice will not be required by this section.

RULE 401 *Visible Emissions*

Visible emissions are not expected with proper maintenance and operation of this equipment. The system shows no visible emissions complaints at this location.

RULE 402 *Nuisance*

Operation of this equipment is not expected to create complaints or nuisance with proper maintenance and operation. The system shows no nuisance complaints at this location.

REG XIII *Rule 1303(a), Best Available Control Technology (BACT)*

The emission increase is less than 0.5 lb/day PM_{10} therefore BACT is not triggered.

Rule 1303 (b)(1), Modeling

The emission increase is less than 0.5 lb/day PM_{10} , modeling is not required (less than Table A-1 allowable emissions of 0.41 lb/hr)..

Rule 1304 (c)(1), Offsets Exemption

The emission increase is less than 0.5 lb/day PM_{10} , therefore offsets are not required.

RULE 1401 *New Source Review of Toxic air Contaminants*

There will be a small amount of toxic contaminants listed in Rule 1401 as amended 6/5/09 due to the addition of four process tanks to the metal finishing line. However there are no carcinogenic compounds present; the acute and



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ENGINEERING AND COMPLIANCE DIVISION**

Coating, Printing, Aerospace & Metal Finishing Team

PERMIT APPLICATION EVALUATION

Page 5 of 6
A/Ns 495585
Processed by: WW
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chronic compound emissions summarized below are well below the Tier I screening levels. Tier 2 analysis was also performed and both the chronic and the acute commercial and residential hazard indices are less than one. Compliance is expected.

REGULATION XXX

The proposed project is considered as a “de minimis significant permit revision” to the Title V permit renewal issued 7/28/2008. This is the first revision since the renewal. Rule 3000(b)(6) defines a “de minimis significant permit revision” as any Title V permit revision where the cumulative emission increases on non-RECLAIM pollutants or hazardous air pollutants (HAP) 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
PM10	30
SOx	60
CO	220

Rule 3003(j) specifies that a proposed permit for the Title V permit renewal shall be submitted to EPA for review. To determine if a project qualifies for a “de minimis significant permit revision”, emission increases resulting from all permit revisions that are made after the submittal of proposed permit to EPA shall be accumulated and compared to the above threshold levels. This is the first permit revision to the Title V Permit Renewal. This revision includes the addition of one oven evaluated separately. This revision also includes the minor permit revision for change of conditions on four spray booths (A/Ns 485214, 485215, 485218 & 485219) that have been evaluated separately. The cumulative emission increases resulting from this proposed permit revision are summarized as follows:

Revision		HAP	VOC	NOx	PM₁₀	SOx	CO
1st Permit Revision	Change of conditions for four spray booths 485214 & 15, 485218 & 19 (minor)	0	0	0	0	0	0
	Add oven A/N 485212 (deminimis significant)	0	0	1	0	0	0
	Modify metal processing tank to add four tanks A/N 495585 (deminimis significant)	0	0	0	<0.50	0	0
Cumulative Total		0	0	1	0	0	0
Maximum Daily		30	30	40	30	60	220



**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
ENGINEERING AND COMPLIANCE DIVISION**

Coating, Printing, Aerospace & Metal Finishing Team

PERMIT APPLICATION EVALUATION

Page 6 of 6
A/Ns 495585

Processed by: WW
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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”, 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) in conjunction with the Rule 212 public notice. If EPA does not raise any objections within the review period and upon completion of the Rule 212 public notice period, a revised Title V permit will be issued to this facility.