

South Coast Air Quality Management District

Statement of Basis

Proposed Title V Renewal Permit

Issue Date: December 20, 2011

Facility Name:	Quemetco, Inc.
Facility ID:	008547
SIC Code:	3341
Equipment Location:	720 S. 7 th Street City Of Industry, CA 91746
Application #(s):	515607
Application Submittal Date(s):	10/19/10
AQMD Contact Person:	Polo, Marco, Air Quality Engineer II
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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 AQMD 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 request the AQMD 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 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. CO, NO₂, SO₂, 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 Quemetco, Inc. located at 720 S. 7th Street, City of Industry, CA. This facility is subject to Title V requirements because it is a major source and is subject to certain NSPS (New Source Performance Standards) and NESHAP (National Emission Standards for Hazardous Air Pollutants) requirements.

2. Facility Description

This is an existing facility that is in the business of recycling lead acid batteries. This facility is operating a battery crushing and material separation system, rotary dryer furnace, reverberatory furnace, electric-arc slag furnace, refining pot-type furnaces, scrubbers, baghouses, dust collectors, a regenerative thermal oxidizer (RTO), and a wet electrostatic precipitator (WESP). The metallurgical furnaces are enclosed in a building which is vented to nine room ventilation dust collectors. This facility receives spent (used) lead-acid batteries and other lead-bearing materials and recycles them by recovering lead and plastic battery case material. The sulfuric acid from the batteries is also treated and recycled by use of the facility's wastewater treatment system and the treated liquid is discharged into the sewer.

3. Construction and Permitting History

Quemetco, Inc. is located in the City of Industry on approximately 13 acres of land. Use of the site for recycling batteries and lead was established by Western Lead products in 1959 and was acquired by Quemetco in 1970. Other parcels in the immediate surrounding area of the Quemetco facility primarily consist of commercial and light manufacturing type businesses. Residential uses are located 600 to 700 feet south and southwest of the southern boundary of the facility.

Numerous permits to construct and permits to operate have been issued to the Quemetco facility. An initial Title V permit was issued to the facility on May 3, 2001, several subsequent revisions occurred, and the initial Title V permit received its first 5 year Title V renewal in 2006. Since the 2006 Title V permit renewal, Quemetco has received permits to construct and operate additional air pollution control equipment, specifically a regenerative thermal oxidizer (RTO) and wet electrostatic precipitator both of which reduce emissions of volatile organic compounds and particulate matter (some of which are toxic) from multiple processes at the Quemetco facility. Other permitting activities included the upgrading of older existing particulate matter control devices.

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, Sections 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. NSPS requirements of 40 CFR Part 60 apply to certain units at the facility and the permit terms and conditions may be found in Sections D and H of the Title V permit. NESHAP requirements of 40 CFR Part 63 also apply to certain units at the

facility and the permit terms and conditions may be found in Sections D, H and J of 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, Sections D, F, H and J, and Appendix B of the proposed Title V permit). This facility is required to monitor fence line ambient air concentrations of lead using four (4) high volume air sampling stations.

Discussion of any applicable monitoring and operational requirements can be found in the Engineering Evaluations. Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 apply to certain units at the facility and the permit terms and conditions may be found in Section D, H, I, and J of the Title V permit, and in the Rule 1407 and Rule 1420 compliance plan letters issued to this facility. Discussion of the CAM requirements is included in the evaluation of the CAM Plan covered by A/N 436957.

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 2010**

Pollutant ID	Pollutant Description	Annual Emissions
CO	Carbon Monoxide	10.654
NOX	Nitrogen Oxides	21.678
ROG	Reactive Organic Gases	8.198
SOX	Sulfur Oxides	18.022
TSP	Total Suspended Particulates	6.313

**Toxic Pollutants (pounds/year)
Annual Reported Emissions for Reporting Period 2010**

Pollutant ID	Pollutant Description	Annual Emissions
35822469	1,2,3,4,6,7,8-Heptachlorodibenzo-p-dioxin	< 0.001
67562394	1,2,3,4,6,7,8-Heptachlorodibenzofuran	< 0.001
70648269	1,2,3,4,7,8-Hexachlorodibenzofuran	< 0.001
57117449	1,2,3,6,7,8-Hexachlorodibenzofuran	< 0.001
57117416	1,2,3,7,8-Pentachlorodibenzofuran	< 0.001
106990	1,3-Butadiene	14.308
123911	1,4-Dioxane	4.996
57117314	2,3,4,7,8-Pentachlorodibenzofuran	< 0.001
1746016	2,3,7,8-Tetrachlorodibenzo-p-dioxin	< 0.001
51207319	2,3,7,8-Tetrachlorodibenzofuran	< 0.001
7664417	Ammonia	262.064
7440382	Arsenic	1.755
56553	Benz[a]anthracene	0.004
71432	Benzene	591.521
7440439	Cadmium	2.408
56235	Carbon tetrachloride	< 0.001
18540299	Chromium (VI)	0.060
218019	Chrysene	0.273
106934	Ethylene dibromide	< 0.001
107062	Ethylene dichloride	< 0.001
50000	Formaldehyde	157.071
7439921	Lead (inorganic)	11.210
75092	Methylene chloride	0.001
91203	Naphthalene	0.024
7440020	Nickel	2.409
1151	PAHs, total, with components not reported	0.008
79016	Trichloroethylene	17.150
75014	Vinyl chloride	< 0.001

Health Risk from Toxic Air Contaminants

The facility is subject to review by the Air Toxics Information and Assessment Act (AB2588). The most recent finalized Facility Health Risk was approved in 2010 with the following risk factors:

Cancer Risk	4.4 in one million
Cancer Burden	0.023
Acute Hazard Index	0.09
Chronic Hazard Index	0.74

These risk levels were based on emission inventory data from 2009. Based on this level of health risk, a Risk Reduction Plan is currently not required under AQMD Rule 1402, and no permit changes are necessary based solely on currently known health risk levels. Quemetco's current Title V permit requires on-going source tests to measure toxic emissions and requires future Health Risk Assessment determinations.

8. Compliance History

The facility has been in constant operation since Quemetco assumed its ownership in 1970. The facility has been subject to both self-reporting requirements and AQMD inspections. The facility has had no citizen complaints filed, 4 Notices to Comply issued, and no Notices of Violation in the last two years. The Notices to Comply issued were requests for Quemetco to provide AQMD with various operational records pertaining to the NOx/SOx RECLAIM program.

9. Compliance Certification

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

10. Comments

The proposed renewal updates the contact information in Section A, corrects a typographical error in permit condition C1.17, corrects a SOx RECLAIM emission factor for an IC engine, and updates the applicable rule table in Section K.