



ENGINEERING AND COMPLIANCE

APPLICATION PROCESSING AND CALCULATIONS

APPL. NO. 464968	DATE: 07/07/11
PROCESSED BY S. JIANG	CHECKED BY D. GORDON

COMPLIANCE ASSURANCE MONITORING (CAM) PLAN

Applicant's Name: FOAM FABRICATORS

Facility ID: 012876

Contact Person: Bill Lopes

Mailing Address: 1810 SOUTH SANTA FE AVENUE
COMPTON, CALIFORNIA 90221

Equipment Location: SAME

APPLICATION NO. 464968:

COMPLIANCE ASSURANCE MONITORING (CAM) PLAN

BACKGROUND

Foam Fabricators is a Title V facility that manufactures expanded polystyrene (EPS) foam shapes for packaging of various electronic devices for shipment. Foam Fabricators is an EPS shape molder. Foam Fabricators currently operates one EPS softening and pre-expansion system, 11 molding presses and one boiler. The EPS softening and pre-expansion system consists of two pre-expanders, 24 aging silos and associated conveyors and hoppers. The VOC emissions from the EPS softening and pre-expansion system and 11 molding presses are being controlled by a regenerative thermal oxidizer (RTO).

The current Title V permit for this facility expired on July 31, 2007. Foam Fabricators had already submitted an application to renew their Title V permit (Title V Renewal Application No. 464970). Pursuant to the requirements specified in 40 CFR Part 64 – Compliance Assurance Monitoring, a facility is required to submit a compliance assurance monitoring (CAM) plan as a part of the Title V renewal application. As a result, Free Flow Packaging International, Inc. submitted a CAM plan application (Application No. 464968) to comply with 40 CFR Part 64 requirements.

EVALUATION

The regenerative thermal oxidizer (Permit to Construct A/N: 450294) is used to control VOC emissions from the two pre-expanders, 24 aging silos and 11 molding presses. The operating temperature of the oxidizer will be maintained at a minimum of 1,500 °F. This facility operates and maintains a temperature measuring and recording system for the oxidizer to continuously measure and record the combustion chamber temperature pursuant to the operation and maintenance requirements specified in 40 CFR Part 64.7. Such a system is expected to have an accuracy of within 1% of the temperature being monitored and will be inspected, maintained, and calibrated on an annual basis in accordance with the manufacturer's specifications.

Pursuant to 40 CFR Part 64, a deviation has been defined as when a combustion chamber temperature of less than 1,450 °F occurs during normal operation of the equipment it serves. The operator is required to

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review the records of the combustion chamber temperature on a daily basis to determine if a deviation occurs or to install an alarm system to alert the operator when a deviation occurs. Whenever a deviation occurs, the operator is required to inspect this equipment to identify the cause of such a deviation, take immediate corrective action to maintain the combustion chamber temperature at or above 1,500 °F, and keep records of the duration and cause (including unknown cause, if applicable) of the deviation and the corrective action taken.

The operator is required to report all deviations to the AQMD pursuant to the requirements specified in 40 CFR Part 64.9 and Condition Nos. 22 and 23 in Section K of their Title V permit. The monitoring report shall include the total operating time of this equipment and the total accumulated duration of all deviations for each semi-annual reporting period specified in Condition No. 23 in Section K of their Title V permit. In addition, the operator is required to submit an application with a Quality Improvement Plan (QIP) in accordance with 40 CFR Part 64.8 to the AQMD if an accumulation of deviations exceeds 5 percent duration of this equipment’s total operating time for any semi-annual reporting period specified in Condition No. 23 in Section K of their Title V permit. The required QIP shall be submitted to the AQMD within 90 calendar days after the due date for the semi-annual monitoring report.

As a part of the CAM plan, the operator is required to inspect and maintain all components of the afterburner on an annual basis in accordance with the manufacturer’s specifications. The operator is also required to keep adequate records in a format that is acceptable to the AQMD to demonstrate compliance with all applicable CAM requirements specified in 40 CFR Part 64.9 for a minimum of five years.

RECOMMENDATION

This facility is expected to comply with all requirements specified in 40 CFR Part 64. Appropriate permit condition will be imposed on Permit to Construct A/N: 450294 of the Title V renewal permit for the oxidizer to implement the above-described CAM requirements. Approval for the CAM plan application is therefore recommended.

The operator shall operate and maintain this equipment according to the following requirements:

The combustion chamber temperature shall be maintained at a minimum of 1,500 degrees Fahrenheit whenever the equipment it serves is in operation.

The operator shall operate and maintain a temperature measuring and recording system to continuously measure and record the combustion chamber temperature pursuant to the operation and maintenance requirements specified in 40 CFR Part 64.7. Such a system shall have an accuracy of within 1% of the temperature being monitored and shall be inspected, maintained, and calibrated on an annual basis in accordance with the manufacturer’s specifications using an applicable AQMD or EPA approved method.

For the purpose of this condition, a deviation shall be defined as when a combustion chamber temperature of less than 1,500 degrees Fahrenheit occurs during normal operation of the equipment it serves. The operator shall review the records of the combustion chamber temperature on a daily basis

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to determine if a deviation occurs or shall install an alarm system to alert the operator when a deviation occurs.

Whenever a deviation occurs, the operator shall inspect this equipment to identify the cause of such a deviation, take immediate corrective action to maintain the combustion chamber temperature at or above 1,500 degrees Fahrenheit, and keep records of the duration and cause (including unknown cause, if applicable) of the deviation and the corrective action taken.

All deviations shall be reported to the AQMD on a semi-annual basis pursuant to the requirements specified in 40 CFR Part 64.9 and Condition Nos. 22 and 23 in Section K of this permit. The semi-annual monitoring report shall include the total operating time of this equipment and the total accumulated duration of all deviations for each semi-annual reporting period specified in Condition No. 23 in Section K of this permit.

The operator shall submit an application with a Quality Improvement Plan (QIP) in accordance with 40 CFR Part 64.8 to the AQMD if an accumulation of deviations exceeds 5 percent duration of this equipment's total operating time for any semi-annual reporting period specified in Condition No. 23 in Section K of this permit. The required QIP shall be submitted to the AQMD within 90 calendar days after the due date for the semi-annual monitoring report.

The operator shall inspect and maintain all components of this equipment on an annual basis in accordance with the manufacturer's specifications.

The operator shall keep adequate records in a format that is acceptable to the AQMD to demonstrate compliance with all applicable requirements specified in this condition and 40 CFR Part 64.9 for a minimum of five years.

[RULE 1175, RULE 1303(a)(1)-BACT; RULE 3004(a)(4)-Periodic Monitoring; 40CFR Part 64, 10-22-1997]