

<b>SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING AND COMPLIANCE</b>  Coating, Printing and Aerospace Operations Team  <b>PERMIT APPLICATION EVALUATION</b>	Page	1 of 12
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	Processed by	Jason Aspell
	Reviewed by	Hamed Mandilawi
	Date	04/25/08

**PERMIT TO OPERATE EVALUATION**  
**Spray Booth (modification), Boilers, Abrasive Blasting (change of condition)**

**Applicant's Name:** Rohr, Inc.  
**Company ID No.:** 800113  
**Mailing Address:** 8200 Arlington Ave., Riverside, CA 92503  
**Equipment Address:** 8200 Arlington Ave., Riverside, CA 92503

**EQUIPMENT DESCRIPTION:**

**Application 475328:**  
 Title V/RECLAIM Revision

Equipment	ID No.	Connected To	Source Type/ Monitoring Unit	Emissions	Conditions
<b>Process 3: EXTERNAL COMBUSTION</b>					
BOILER, FIRETUBE, NATURAL GAS, KEWANEE, MODEL HS500G02, 21 MMBTU/HR WITH  BURNER, NATURAL GAS, NORTH AMERICAN MFG., MODEL 4385, WITH STAGED COMBUSTION, FLUE GAS RECIRCULATION, 21 MMBTU/HR  A/N 471283	D21		NOx: LARGE SOURCE	CO: 50 PPMV (5B) [RULE 1303(b)(2)-O set,5-10-1996;RULE 1303(b)(2)-O set,12-6-2002] ; CO: 400 PPMV (5) [RULE 1146,11- 17-2000]  CO: 2000 PPMV (5A) [RULE 407,4-2-1982] ; NOX: 37 PPMV NATURAL GAS (3) [RULE 2012,5-6-2005] ; PM: 0.1 GRAINS/SCF (5) [RULE 409,8-7-1981]	D328.1, E73.1, H23.9,
BOILER, FIRETUBE, NATURAL GAS, KEWANEE, MODEL H3S750G0A, 31 MMBTU/HR WITH  BURNER, NATURAL GAS, NORTH AMERICAN MFG., MODEL 4385, WITH STAGED COMBUSTION, FLUE GAS RECIRCULATION, 31 MMBTU/HR  A/N 471286	D22		NOx: LARGE SOURCE	CO: 50 PPMV (5B) [RULE 1303(b)(2)-O set,5-10-1996;RULE 1303(b)(2)-O set,12-6-2002] ; CO: 400 PPMV (5) [RULE 1146,11- 17-2000]  CO: 2000 PPMV (5A) [RULE 407,4-2-1982] ; NOX: 37 PPMV NATURAL GAS (3) [RULE 2012,5-6-2005] ; PM: 0.1 GRAINS/SCF (5) [RULE 409,8-7-1981]	D328.1, E73.1, H23.9,

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Equipment	ID No.	Connected To	Source Type/ Monitoring Unit	Emissions	Conditions
<b>Process 4: SURFACE COATING</b>					
<b>System 1: PRODUCTION SPRAY BOOTHS</b>					
SPRAY COATING OPERATION, G-34, 14 FT-5 IN W., X 19FT-4 IN L., X 9 FT H., WITH 2 STAGE DRY FILTERS, 168" X 102" BLANKET (1 ST. STAGE) AND TWENTY EIGHT 24" X 24" X 2" (2 ND. STAGE).  A/N 475330	D202			PM: (9) [RULE 404, 2-7-1986]; VOC: (10)[40CFR 63 Subpart GG]; VOC: (9) [RULE 1124, 9-21-2001]; VOC: (9) [RULE 1171,11-7-2003; <i>RULE 1171, 2-1-2008</i> ]	A63.7, B59.9, C1.18, C1.19, C6.1, D322.1, H23.12, K67.1, K67.2, K67.6

Equipment	ID No.	Connected To	Source Type/ Monitoring Unit	Emissions	Conditions
<b>Process 9: ABRASIVE BLASTING</b>					
ABRASIVE BLASTING, MATERIAL Aluminum Oxide, ROOM, WIDTH: 16 FT; HEIGHT: 12 FT; LENGTH: 23 FT WITH FOUR ABRASIVE BLASTING NOZZLE, 0.75 DIA EACH  A/N 471912	D67	C68 C70		PM: (9) [RULE 1140, 2-1-1980, <i>RULE 1140, 8-2-1985, RULE 405, 2-7-1986</i> ];	D323.1, E448.1, K67.9

**HISTORY:**

The company submitted Application Nos. 471283 and 471286 on 6/27/07 for a change of conditions to two boilers at the facility to reduce the CO concentration limit. The facility then submitted A/N 471912 on 7/18/07 for a change in conditions for an abrasive blasting room to reduce the throughput to reduce PM emissions from the unit. Later, on 11/6/07, the company submitted another application for a change of conditions for spray booth and the RECLAIM/Title V Permit Revision application for the entire group.

The company currently has nine open applications for a spray booth, abrasive blasting rooms and control equipment and ovens that have been issued permits to construct, but have not been issued permits to operate due to a discrepancy with the companies NSR balance for PM and CO emissions. After calculating the facility wide emissions it was discovered that the company had exceeded the offset exemption limit for CO and PM in Table A of Rule 1304. When the applications were initially submitted for the boilers, it was to meet the 29 ton CO/year limit so they would not have to provide offsets for on-going projects. After the applications were submitted, CO attainment status was declared and therefore offsets for CO are no longer required for compliance. However, the applications will be processed since the offsets were required previous to the declaration of attainment. The reduction will prevent any future increase in CO emissions from the boilers through BACT requirements..

In the application package for A/N 475330, the company requested that the Spray Booth under D132 be inactivated and that the operations be transferred to D202. The company will also be canceling D229 and transferring those operations to D202.

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The company is a Title V source and is a Cycle 2 RECLAIM facility for NO<sub>x</sub> emissions. The company has a RECLAIM allocation of 19687 lb NO<sub>x</sub> for the Cycle starting in July 2007. The company is located in an industrial zone with nearby residential areas located to the north and south of the property. There have been no recent complaints filed against the facility. In May 2007, the company received a notice of violation for applying a chromium containing coating in one of their spray booths. The notice also included a violation for a failure to correctly monitor one of their degreasers. The company achieved compliance for these items on 7/5/07.

As part of the permit revision the following devices will be converted from Permits to Construct to Permits to Operate: D230, C232, C233, C234, D235, C237, C238, C239, D241, D244, and D245. The following will be inactivated at the request of the facility: D132, D229, and D240.

**PROCESS DESCRIPTION:**

Rohr, Inc. is a subsidiary of the Goodrich Corporation, and is a large producer of military and commercial aerospace products. The project will include reducing the usage of abrasive blasting material in D67 to allow sufficient space for PM emissions for new equipment already issued PCs. D67 currently has no usage limit, but was previously allocated 8 lb PM<sub>10</sub>/day in the evaluation for the previous permit. The equipment is currently vented to baghouses with a 99% collection efficiency. The equipment has four nozzles and uses aluminum oxide as the blasting media.

This project will also involve transferring the operations of the spray booths under D132 and D229 to D202. D132 is being removed since it is a water wash spray booth and the company is moving the operations to D202 since it has dry filters. This primarily involves the addition of formaldehyde and acetaldehyde, contained in the Flexbond adhesive, to the allowed toxics applied in the spray booth. Another reason for the transfer, is that D132 does not allow the toxics in the new adhesive. This spray booth is equipped with two stage exhaust filtration with an efficiency of 90%. The operation of this spray booth will continue to remain under the process VOC limit of 1179 lb VOC/day. No more than 3 gallons per day of this adhesive are expected to be used in the booth. According to the applicant, no operations are currently conducted in D202 and D229 was never constructed. Therefore, the Flexbond will be the only application in D202. D202 currently has an equipment limit of 10 lb VOC/day, which it will maintain, and D229 and D132 each have equipment limits of 1 lb VOC/day. D229 is currently operating under a Permit to Construct.

The company will also be lowering the CO concentration limits on D21 and D22 to 50 ppm. Both boilers are currently subject to 400 ppm CO limits. Previous source tests of the boilers indicate that they are operating well below the proposed limit.

The facility's emissions, including equipment with Permits to Construct is currently at 34.39 ton CO per year and 4.16 ton PM<sub>10</sub> per year. The purpose of the reductions will be to lower these emissions below the Offset Thresholds in Table A of Rule 1304 of 29 tons CO per year and 4 tons PM<sub>10</sub> per year.

The operating hours of the facility are 24 hrs/day, 7 day/week, 52 weeks/yr.

**EMISSION CALCULATIONS:**

**Boilers**

Using the NO<sub>x</sub> Emission Factor calculation from Rule 2012, yields emission factors in the table below:

To obtain the CO emission factor, the following equation was used:

$$CO\ EF(\text{lb}/\text{mmcf}) = \text{ppm} \cdot \left[ \frac{20.9}{20.9 - b} \right] \cdot 28 \frac{\text{lb}}{\text{lbmole}} \cdot 10^{-6} \cdot V \cdot F_d \div 379 \frac{\text{cf}}{\text{lbmole}}$$

where

b = standard O2 concentration (3%)

Fd = Dry F - factor (Natural Gas = 8710 dscf/MMBTU)

V = Higher heating value (1050 MMBTU/mmcf)

The emissions for NOx, VOC, PM10 and SOx will remain the same.

D21 is 21 mmBTU/hr resulting in a natural gas usage of 0.02 mmscf/hr. D22 is 31 mmBTU/hr with a fuel usage rate of 0.03 mmscf/hr.

#### Previous Emissions

Pollutant	Hourly Emissions		Daily Emissions	
	D21	D22	D21	D22
CO	1.72	2.54	41.3	60.9

#### New Emissions

Pollutant	Emission Factors	Hourly Emissions		Daily Emissions	
		D21	D22	D21	D22
CO	50 ppmv; 39.4 lb/mmcf	0.788	1.18	18.9	28.3

#### Reductions

$$\begin{aligned} D21: 41.3 - 18.9 &= 22.4 \text{ lb CO/day} \\ &= 8064 \text{ lb CO/yr} = 4.032 \text{ ton/yr} \end{aligned}$$

$$\begin{aligned} D22: 60.9 - 28.3 &= 32.6 \text{ lb/day} \\ &= 11,736 \text{ lb CO/yr} = 5.868 \text{ ton/yr} \end{aligned}$$

Total CO reduction = 9.9 tons CO/yr

Emissions of all other compounds will be entered the same as the NSR entries for the previous application.

#### Abrasive Blasting

The equipment's PM10 emissions need to be reduced by 1 lb PM10/day, to offset the increase of 1 lb/day of PM emissions from A/N 456622 (D241).

4 Abrasive Blasting Nozzles each 3/4" @ 80 psi  
PM = 2 x PM10

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From the Permit Processing Handbook:

Sand Flow Rate = 2400 lb sand/hr

Density: Aluminum Oxide - 160 lb/gal; Sand - 99 lb/gal

Aluminum Oxide Flow Rate = 2400 x 160/99 = 3878.8 lb Al. Ox/hr per nozzle

Total Flow Rate = 4 nozzles x 3879 lb/hr = 15,516 lb/hr

= 372,384 lb Al Ox/day

Emission Factor = 0.01 lb PM/lb Al Ox

Current Maximum PM Emissions

From the previous application, the current 30-Day Avg. PM10 emission is 4.0 lb PM10/day (8 lb PM2)

R2, PM10, day = 4 lb PM10/day

R2, PM10, hr = 0.167 lb PM10/hr

R1, PM10, hr = 0.167 / (1-0.99) = 16.67 lb PM10/hr

R1, PM, hr = 0.33 / (1-0.99) = 33 lb PM/hr

Al Ox Usage = 33 lb PM/hr ÷ 0.01 lb PM/lb Al Ox = 3300 lb Al Ox/hr

= 79,200 lb Al Ox/day

Based on the emission factor 200 lb Al Ox result in 1 lb PM10 (uncontrolled) this results in a daily usage to 79,200 lb Al Ox/day. To reduce PM10 emissions by one pound the daily emissions will be reduced to 3.0 lb PM10/day.

Reduced PM Emissions

R2, PM10, day = 3.0 lb PM10/day

R2, PM10, hr = 0.125 lb PM10/hr

R1, PM10, hr = 12.5 lb PM10/hr

R2, PM, hr = 0.25 lb PM/hr

R1, PM, hr = 25.0 lb PM/hr

Al Ox usage = 25.0 lb PM/hr ÷ 0.01 lb PM/lb Al Ox = 2,500 lb Al Ox/hr

= 60,000 lb Al Ox/day

The usage limit will be imposed as a permit condition. Therefore the equipment will be limited to 60,000 lb Al Ox per month

Spray Booth

65% transfer efficiency

90% control efficiency

PM = 2 x PM10

ROG = TOG

The current Potential to Emit for this spray will remain at its current level of 10 lb VOC/day. The company only expects to apply 3 gallons per day in this booth, which will result in significantly less VOC emissions than the limit since the VOC content of the adhesive is 0.011 lb VOC/gal. Due to the low VOC content of the adhesive, a separate usage limit will be needed to limit toxic emissions since the maximum usage under the VOC limit would cause the equipment to exceed the 1401 health risk limits. Therefore a monthly limit of 90 gallons of adhesive per month will be added. The PM emissions calculated below are based on the Rule 1124 VOC limit and an assumed average of 3 lb PM/gal.

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$$R1, \text{ ROG }_{,hr} = 10.0 \frac{\text{lb ROG}}{\text{day}} \div 24 \frac{\text{hr}}{\text{day}} = 0.42 \frac{\text{lb ROG}}{\text{hr}}$$

$$R1 = R2$$

$$\text{PM, max} = 10 \frac{\text{lb ROG}}{\text{day}} \div 2.1 \frac{\text{lb VOC}}{\text{gal}} \cdot 3 \frac{\text{PM}}{\text{gal}} = 14.3 \frac{\text{lb PM}}{\text{day}}$$

$$R1_{PM,hr} = 14.3 \frac{\text{lb PM}}{\text{day}} \cdot (1 - 0.65) \div 24 = 0.21 \frac{\text{lb PM}}{\text{hr}}$$

$$R2_{PM,hr} = 0.21 \cdot (1 - 0.90) = 0.02 \frac{\text{lb PM}}{\text{hr}} \quad (PM = 2 PM_{10})$$

$$30\text{-Day Avg, PM}_{10} = 0.02 \frac{\text{lb PM}}{\text{hr}} \cdot 0.5 \frac{\text{lb PM}_{10}}{\text{lb PM}} \cdot 7 \frac{\text{day}}{\text{week}} \cdot 4.33 \frac{\text{wk}}{\text{mo}} \cdot \frac{1 \text{ month}}{30 \text{ days}} = 0.01 \frac{\text{lb PM}_{10}}{\text{day}}$$

**RULES/REGULATION  
EVALUATION:**

**RULE 212, PUBLIC NOTIFICATION**

**SUBPARAGRAPH 212(c)(1):**

This paragraph requires a public notice for all new or modified permit units that may emit air contaminants located within 1,000 feet from the outer boundary of a school. According to the MSN Yellow Pages and Google Maps, the facility will not be within 1000 feet of any schools. Therefore, public notice distribution will not be required under this section.

**PARAGRAPH 212(c)(2):**

The changes in condition will not result in emission increases exceeding the daily maximums for NOx, CO, SOx, VOC or PM10 emissions as specified in Rule 212(g). The spray booth will stay at the same emission level, and the abrasive blasting room and boilers will experience a decrease in PM and CO emissions. Therefore, no equipment will have an increase in emissions and a 30-day public notice period will not be required under this paragraph.

**PARAGRAPH 212(c)(3):**

A public notice will not be required under this paragraph. See Rule 1401 evaluation section.

**PARAGRAPH 212(g):**

The changes in condition will not result in emission increases exceeding the daily maximums for NOx, CO, SOx, VOC or PM10 emissions as specified in Rule 212(g). The spray booth will stay at the same emission level, and the abrasive blasting room and boilers will experience a decrease in PM and CO emissions, resulting in an overall decrease in emissions at the facility. Therefore, a 30-day public notice period will not be required under this paragraph.

**RULE 401, VISIBLE EMISSIONS**

With the proper use of the equipment, no visible emissions are expected.

**RULE 402, NUISANCE**

With the proper operation of the equipment, no nuisance problems are expected at this facility. The facility is located within an industrial area with nearby residential areas to the north and south of the facility. The operations in the spray booth will be the same as previously permitted, it will just be at a new location at the facility. The abrasive blasting room and the boilers will have a reduction of permitted emissions. Based on previous experience with this operation, the emissions from the equipment should not result in a nuisance. Compliance with this rule is expected.

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**RULE 1124, AEROSPACE ASSEMBLY AND COMPONENT MANUFACTURING OPERATIONS**

In the spray booth, the company will be spraying a maskant adhesive onto aerospace parts and products. The current limit in this rule for a non-structural adhesive is 250 g VOC/L. The Flexbond 153 used in this booth will have a VOC content of 1.38 g VOC/L. The material will be applied with a HVLP spray gun which will meet the transfer efficiency requirements of subsection (c)(3) of this rule. For solvent cleaning purposes, the facility will be using acetone for items processed in the spray booth. Acetone is defined as an exempt compound under Rule 102. Coating and adhesive application equipment is subject to Rule 1171. The company will meet the cleaning and coating requirements for this rule. Compliance with this rule is expected.

**RULE 1132, FURTHER CONTROL OF VOC EMISSIONS FROM HIGH EMITTING SPRAY BOOTH FACILITIES**

The facility has a VOC PTE greater than 20 tons per year and is subject to the requirements of this rule. This spray booth will meet the exemption from section (c) of this rule by meeting the requirements of 1132(h)(2). The allowable VOC emission for this booth is 10 lbs of VOC per day. Therefore this spray booth qualifies under the lowest tier in the table in this subsection and will meet the exemption requirements. The flow rate of the spray booth is 14000 cfm, which actually allows a higher VOC limit (25 lb/day). Since the emission rate is in the lowest tier, no flow rate permit conditions will be required for this rule. Continued compliance with this rule is expected.

**RULE 1171, SOLVENT CLEANING OPERATIONS**

The company will be using acetone for spray gun cleaning. Acetone is defined as an exempt compound under Rule 102. Compliance with this rule is expected.

**REGULATION XIII**

**RULE 1303(a), BEST AVAILABLE CONTROL TECHNOLOGY (BACT)**

The change in conditions will not result in an increase in emissions of criteria pollutants for the boilers, spray booth or the abrasive blasting room. Therefore no BACT requirements will be triggered for this equipment.

**RULE 1303(b)(1), MODELING**

The change in conditions will not result in an increased emission of any criteria pollutant for the boilers, spray booth or the abrasive blasting room. Therefore no modeling requirements will be triggered for this equipment.

**RULE 1304(c)(1), OFFSET EXEMPTIONS**

The change in conditions will not result in the increased emission of any criteria pollutant for the facility. Therefore no offsets will be required for this project.

**RULE 1401, NEW SOURCE REVIEW OF TOXIC AIR CONTAMINANTS**

According to the Material Safety Data Sheets (MSDS) that were submitted with these applications, Rohr, Inc. will be spraying adhesive in the spray booth that contains toxic air contaminants (TAC) identified in Table 1 of Rule 1401, with an effective date of March 4, 2005 or earlier. The abrasive blasting equipment and boilers will result in a decrease in emissions and therefore will be exempt from this rule under subsection (g)(1)(B) since there will be no increase in risk. The new adhesive in the spray booth will contain formaldehyde and acetaldehyde, identified as carcinogenic compounds. The previous booth did not allow these compounds to be applied. The 10 lb VOC/day limit will allow an excessive amount of the adhesive to be applied because of the low VOC content. This will

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result in toxic emissions that will exceed the health risk limits of this rule. Therefore, an additional emission of limit of 0.4 lb acetaldehyde per month and 0.64 lb formaldehyde per month (based on 3 gal adhesive /day) will be imposed in accordance with the company’s maximum expected usage. Under these limits, the spray booth passes a Tier I health risk assessment.

A permit condition will be added disallowing the use of materials that contain toxic air contaminants as identified in Rule 1401, as amended on March 4, 2005, or earlier, except for acetaldehyde and formaldehyde. The acetaldehyde and formaldehyde content of the adhesive will also be limited by permit condition. Compliance with this rule is expected

**REGULATION XX-RECLAIM**

**RULE 2005-NEW SOURCE REVIEW FOR RECLAIM**

Rohr, Inc. is a NOx RECLAIM facility. This project will not affect NOx emissions at the facility since the spray booth and abrasive blasting room do not emit NOx and the change of condition for the boilers will not affect the NOx emissions. This rule is not applicable to this project.

**40 CFR 63 SUBPART GG- National Emission Standards for Aerospace Manufacturing**

The facility is a major source pursuant to §63.2, and will be subject to the requirements of this subpart. To comply with §63.744 the company will be using acetone for hand wipe operations and enclosed cleaning systems to clean application equipment. The cleaner will be an exempt solvent that is non-photochemically reactive and is not a HAP. The facility will be applying adhesives in this spray booth. Pursuant to 63.741(f), there are no control requirements for adhesive applications. The facility is expected to comply with this section.

**40 CFR 63 SUBPART DDDDD- National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Industrial Boilers and Process Heaters**

The facility is a major source pursuant to §63.2, and will be subject to the requirements of this subpart. D21 and D22 are fire tube boilers which qualify existing small gaseous fuel units under the definitions in this subpart. Pursuant to 63.7506(c), these units are not subject to any emission limits, performance testing or any other requirements. Compliance with this subpart is expected.

**REGULATION XXX: TITLE V**

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

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PM <sub>10</sub>	30
SO <sub>x</sub> *	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 **5th** permit revision to the **Title V renewal permit** issued to this facility on **May 9, 2005**. The following table summarizes the cumulative emission increases resulting from all permit revisions since the **Title V renewal permit** was issued:

Revision	HAP	VOC	NO <sub>x</sub> *	PM <sub>10</sub>	SO <sub>x</sub>	CO
Previous permit Revisions.	0	4	12*	0	0	90
5 <sup>th</sup> Permit Revision: Modification of Spray Booth D202, Change of Conditions for Abrasive Blasting Room D67 and Boilers D21 and D22.	0	0	0	0 (-1) <sup>+</sup>	0	0 (-55) <sup>+</sup>
Cumulative Total	0	4	12*	0	0	9
Maximum Daily	30	30	40*	30	60	220

\* RECLAIM pollutant, not subject to emission accumulation requirements

+ Reduced emissions will not be subtracted from Cumulative Total

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 NO<sub>x</sub> 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. However, the change of permit condition requested to lower the CO concentration for the two boilers will not result in an increase in NO<sub>x</sub> emissions. As a result, this proposed project is considered as a “minor permit revision” for RECLAIM pollutants.

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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” for non-RECLAIM pollutants or hazardous air pollutants (HAPs), and a “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.

**PERMIT CONDITIONS**

The equipment will be subject to the following permit conditions

**Boilers D21, D22**

**D328.1**

THE OPERATOR SHALL DETERMINE COMPLIANCE WITH THE CO EMISSION LIMIT(S) EITHER: (A) CONDUCTING A SOURCE TEST AT LEAST ONCE EVERY FIVE YEARS USING AQMD METHOD 100.1 OR 10.1; OR (B) CONDUCTING A TEST AT LEAST ANNUALLY USING A PORTABLE ANALYZER AND AQMD-APPROVED TEST METHOD. THE TEST SHALL BE CONDUCTED WHEN THE EQUIPMENT IS OPERATING UNDER NORMAL CONDITIONS TO DEMONSTRATE COMPLIANCE WITH THE CO CONCENTRATION LIMIT(S). THE OPERATOR SHALL COMPLY WITH ALL GENERAL TESTING, REPORTING, AND RECORDKEEPING REQUIREMENTS IN SECTIONS E AND K OF THIS PERMIT.

**E73.1**

NOTWITHSTANDING THE REQUIREMENTS OF SECTION E CONDITIONS, THE OPERATOR IS NOT REQUIRED TO USE FGR IF THE BOILER STACK TEMPERATURE IS BELOW 450 DEG. F:

**H23.9**

THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES OR REGULATIONS:

CONTAMINANT	RULE	RULE/SUBPART
CO	DISTRICT RULE	1146

**Spray Booth D202**

**A63.7**

THE OPERATOR SHALL LIMIT EMISSIONS FROM THIS EQUIPMENT AS FOLLOWS:

CONTAMINANT	EMISSIONS LIMIT
VOC	LESS THAN OR EQUAL TO 10 LBS IN ANY ONE DAY

**B59.9**

THE OPERATOR SHALL NOT USE THE FOLLOWING MATERIAL(S) IN THIS DEVICE :

- A. Materials containing toxic air contaminants identified in Table I of Rule 1401, with an effective date of March 4, 2005, or earlier, except for formaldehyde (CAS No. 50-00-0) and acetaldehyde (CAS No. 75-07-0).
- B. Materials containing formaldehyde in concentrations greater than 0.05% by wt., or acetaldehyde in concentrations greater than 0.08% by wt.

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	Reviewed by	Hamed Mandilawi
	Date	04/25/08

**C1.18**

THE OPERATOR SHALL LIMIT THE MATERIAL PROCESSED TO NO MORE THAN 0.40 LB(S) IN ANY ONE CALENDAR MONTH.

For the purpose of this condition, material processed shall be defined as acetaldehyde emissions.

The operator shall maintain records in a manner approved by the District, to demonstrate compliance with this condition.

**C1.19**

THE OPERATOR SHALL LIMIT THE MATERIAL PROCESSED TO NO MORE THAN 0.64 LB(S) IN ANY ONE CALENDAR MONTH.

For the purpose of this condition, material processed shall be defined as formaldehyde emissions.

The operator shall maintain records in a manner approved by the District, to demonstrate compliance with this condition.

**C6.1**

THE OPERATOR SHALL USE THIS EQUIPMENT IN SUCH A MANNER THAT THE DIFFERENTIAL PRESSURE BEING MONITORED, AS INDICATED BELOW, DOES NOT EXCEED 0.5 INCHES WATER COLUMN.

To comply with this condition, the operator shall install and maintain a(n) differential pressure gauge to accurately indicate the differential pressure across the two stage filter media.

**D322.1**

THE OPERATOR SHALL PERFORM A WEEKLY INSPECTION OF THE EQUIPMENT AND FILTER MEDIA FOR LEAKS, BROKEN OR TORN FILTER MEDIA, AND IMPROPERLY INSTALLED FILTER MEDIA.

**H23.12**

THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES OR REGULATIONS:

CONTAMINANT	RULE	RULE/SUBPART
VOC	DISTRICT RULE	109
VOC	DISTRICT RULE	1124
VOC	DISTRICT RULE	1171
PM	DISTRICT RULE	481
HAPS	40CFR63, SUBPART	GG

**K67.1**

THE OPERATOR SHALL KEEP RECORDS, IN A MANNER APPROVED BY THE DISTRICT, FOR THE FOLLOWING PARAMETER(S) OR ITEM(S):

the name of the person performing the inspection and/or maintenance of the filter media

the date, time and results of the inspection

the date, time and description of any maintenance or repairs resulting from the inspection

**K67.2**

THE OPERATOR SHALL KEEP RECORDS, IN A MANNER APPROVED BY THE DISTRICT, FOR THE FOLLOWING PARAMETER(S) OR ITEM(S):

weekly record of pressure drop across the filter media

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**K67.6**

THE OPERATOR SHALL KEEP RECORDS, IN A MANNER APPROVED BY THE DISTRICT, FOR THE FOLLOWING PARAMETER(S) OR ITEM(S):

daily usage and volatile organic compound emissions in a manner approved by the Executive Officer

**Abrasive Blasting D67**

D323.1

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 THAT LAST MORE THAN THREE MINUTES IN ANY ONE HOUR, THE OPERATOR SHALL VERIFY AND CERTIFY WITHIN 24 HOURS THAT THE EQUIPMENT CAUSING THE EMISSION AND ANY ASSOCIATED AIR POLLUTION CONTROL EQUIPMENT ARE OPERATING NORMALLY ACCORDING TO THEIR DESIGN AND STANDARD PROCEDURES AND UNDER THE SAME CONDITIONS UNDER WHICH COMPLIANCE WAS ACHIEVED IN THE PAST, AND EITHER:

- 1). 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; OR
- 2). HAVE A CARB-CERTIFIED SMOKE READER DETERMINE COMPLIANCE WITH THE OPACITY STANDARD, USING EPA METHOD 9 OR THE PROCEDURES IN THE CARB MANUAL "VISIBLE EMISSION EVALUATION", WITHIN THREE BUSINESS DAYS AND REPORT ANY DEVIATIONS TO AQMD.

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;
- 3). DATE AND TIME VISIBLE EMISSION WAS ABATED; AND
- 4). ALL VISIBLE EMISSION OBSERVATION RECORDS BY OPERATOR OR A CERTIFIED SMOKE READER.

E448.1

THE OPERATOR SHALL COMPLY WITH THE FOLLOWING REQUIREMENTS:

the total quantity of abrasive blasting media discharged through the nozzles shall not exceed 60,000 pounds per day

**K67.9**

THE OPERATOR SHALL KEEP RECORDS, IN A MANNER APPROVED BY THE DISTRICT, FOR THE FOLLOWING PARAMETER(S) OR ITEM(S):

Daily usage of abrasive media including recycled material