

<b>SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</b> <b>ENGINEERING AND COMPLIANCE</b> Coating, Printing and Aerospace Operations Team  <b>PERMIT APPLICATION EVALUATION</b>	Page	1 of 18
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**PERMIT TO CONSTRUCT EVALUATION**  
**Spray Booths, Oven, and RTO**

**Applicant's Name:** Robinson Helicopter Co., Inc.

**Company ID No.:** 100806

**Mailing Address:** 2901-31 Airport Dr., Torrance, CA 90505

**Equipment Address:** 2901-31 Airport Dr., Torrance, CA 90505

**EQUIPMENT DESCRIPTION:**

**Application 542859:**

Title V Revision, de minimis significant

**Application 542862-P/C**

**MODIFICATION TO AIR POLLUTION CONTROL SYSTEM OPERATING UNDER PERMIT TO CONSTRUCT (A/N 534346) CONSISTING OF:**

1. THERMAL OXIDIZER, REGENERATIVE TYPE, ADWEST TECHNOLOGIES, MODEL RETOX 18.0 RTO97, 26'-10" L. X 21'-6" W. X 11'-2" H., 18,000 SCFM CAPACITY WITH A 5.2 MMBTU PER HOUR STARTER BURNER, A 2.7 MM BTU PER HOUR GAS INJECTION SYSTEM, 2 CERAMIC BEDS, A 5 HP COMBUSTION BLOWER, AND A COIL MEDIA HEAT EXCHANGER.
2. EXHAUST SYSTEM WITH ONE 100 HP FAN VENTING THREE SPRAY BOOTHS AND THREE DRYING OVENS (A/NOS: 534647, 534348, 534349, 534350, 534351, & 534352), ALL OPERATING AS PERMANENT TOTAL ENCLOSURES

**BY THE ADDITION OF:**

THE VENTING OF TWO EXISTING SPRAY BOOTHS (NOS: 6 & 7) AND ONE EXISTING OVEN, (A/NOS: 542861, 542860 & 542974)

**Application 542861, P/C**

**MODIFICATION TO SPRAY BOOTH #6, OPERATING UNDER PERMIT TO CONSTRUCT (A/N 523887) CONSISTING OF:**

SPRAY BOOTH NO. 6, MARATHON, MODEL NO. RAF 520820 14L IHH, FLOOR TYPE, 15' W. X 17' L. X 8' H., WITH THREE STAGE A-3000 EXHAUST FILTRATION SYSTEM CONSISTING OF: BLANKET FILTER FIRST STAGE, TWENTY FOUR 20" X 20" OSM-100 SECOND STAGE, TWENTY FOUR 20" X 20" ATI A-3000 THIRD STAGE, ONE 7-1/2 H.P. EXHAUST FAN, AND A 1,000,000 BTU/HR MIDCO LNB 1000 LOW-NO<sub>x</sub> NATURAL GAS-FIRED BURNER.

BY THE VENTING OF THE SPRAY BOOTH TO THE THERMAL OXIDIZER (A/N: 542862).

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**Application 542974, P/ C**

MODIFICATION TO SPRAY BOOTH #7, OPERATING UNDER PERMIT TO CONSTRUCT (A/N 523888) CONSISTING OF:

SPRAY BOOTH NO. 7, MARATHON, MODEL NO. RAF 520820 14L IHH, FLOOR TYPE, 15' W. X 17' L. X 8' H., WITH THREE STAGE A-3000 EXHAUST FILTRATION SYSTEM CONSISTING OF: BLANKET FILTER FIRST STAGE, TWENTY FOUR 20" X 20" OSM-100 SECOND STAGE, TWENTY FOUR 20" X 20" ATI A-3000 THIRD STAGE, ONE 7-1/2 H.P. EXHAUST FAN, AND A 1,000,000 BTU/HR MIDCO LNB 1000 LOW-NO<sub>x</sub> NATURAL GAS-FIRED BURNER.

BY THE THE VENTING OF THE SPRAY BOOTH TO THE THERMAL OXIDIZER (A/N: 542862).

**Application 542860- P/C**

MODIFICATION OF DRYING OVEN, OPERATING UNDER PERMIT TO CONSTRUCT (A/N 523886) CONSISTING OF:

DRYING OVEN, MARATHON, BATCH TYPE, 20' W. X 17'L. X 8' H., NATURAL GAS HEATED, WITH ONE 1,000,000 BTU/HR MIDCO LNB 1000 LOW NOX NATURAL GAS-FIRED BURNER., WITH A 12,000-SCFM CIRCULATING FAN, AND A 3914-SCFM EXHAUST FAN, FOR DRYING PAINTED HELICOPTER PARTS.

BY THE VENTING OF THE DRYING OVEN TO THE THERMAL OXIDIZER (A/N: 542862).

**HISTORY:**

The facility submitted the above applications on 09/18/12 for modification of two existing spray booths, and one batch oven to be vented to the existing new thermal oxidizer. After this modification, a total of five spray booths and four ovens will be vented to the thermal oxidizer. A/N 552859 was submitted for TV permit revision.

Spray booths No's 6 and 7 and the oven were issued permits to construct on February 3, 2012 as new construction, and under the PCs, the facility is required to conduct source tests to verify the NO<sub>x</sub> emissions from the low NO<sub>x</sub> burners associated with the spray booths and oven.

The company is a Title V facility, but is not in the RECLAIM program. Title V renewal permit was issued to the facility on March 27, 2012. This project is the 2<sup>nd</sup> permit revision since the issuance of the Title V renewal permit. The facility is located in an industrial area adjacent to the Torrance Airport, with no nearby sensitive receptors. A review of compliance records indicates that the facility has had no citizen complaints filed, Notices to Comply or Notices of Violation issued in the last two years.

The following is a summary of the history of the above equipment:

Equipment Description	Previous A/N	New A/N	Action
Drying Oven #5	523886 New Construction	542860	P/C, Modification/venting to new Thermal Oxidizer

Equipment Description	Previous A/N	New A/N	Action
Spray Booth #6	523887 New Construction	542861	P/C, Modification/venting to Thermal Oxidizer
Spray Booth #7	523888 New Construction	542974	P/C, Modification/venting to Thermal Oxidizer
APC (Thermal Oxidizer)	534346 New construction/Replacement of RTO	542862	P/C, Modification with venting two additional existing spray booths and one existing drying oven (room).

**PROCESS DESCRIPTION:**

Robinson Helicopter is a manufacturer of helicopters and uses the subject spray booth to coat helicopter parts. The parts are dried in drying rooms, and some of the booths and ovens are vented to a thermal oxidizer. The facility operates other permitted equipment for surface preparation, and a gasoline dispensing tank.

**Thermal Oxidizer**

The facility has proposed to vent two additional spray booths, and an oven to the RTO. Adwest guarantees a minimum of 95% destruction efficiency for the VOC emissions.

A source test will be required to verify that the PTEs are in compliance with EPA Method 204 requirements (100% capture efficiency), and 95% destruction efficiency.

**RTO Size:**

The RTO is sized for 18,000 scfm and is currently venting three existing spray booths (3000 cfm each), and three ovens (1000 cfm each). The proposed venting of spray booths No's 6 and 7 will require an additional venting of 2000 cfm each. And the proposed venting of the oven will require an additional venting of 1000 cfm. The following is the summary of venting required for each unit.

Spray #1	3000 CFM
Spray #2	3000 CFM
Spray #5	3000 CFM
Spray #6 (new addition)	2000 CFM
Spray #7 (new addition)	2000 CFM

Drying Oven #2	1000 CFM
Drying Oven #1	1000 CFM
Drying Oven # 5	1000 CFM
Drying Oven (marathon, new addition)	1000 CFM

Total: 17,000 CFM <18000 CFM RTO Capacity

Therefore, the RTO is adequately designed to handle the additional venting of the two spray booths and oven. A source test requirement will be placed on the permit to verify that the PTEs meet the requirements of EPA Method 204 and to verify the destruction efficiency of the thermal oxidizer. The RTO design was verified during the previous evaluation (A/N 534346).

**Emissions:**

There will be no change in emissions as a result of the products of the combustion from the start-up burner in RTO. The emissions for NSR and AEIS will be entered as calculated on previous application.

From Previous Evaluation:

Criteria pollutants will be emitted as a result of the products of combustion from the start-up burner in the RTO. The startup burner will typically run for 60-90 minutes from a cold start to get up to temperature (1500-1700 -degrees F).

Combustion Emissions

Emission Factor

Fuel Rate	VOC	Nox	SOx	CO	PM
(0.004952 mm ft <sup>3</sup> /hr)	7.0	36*	0.83	35	7.6
Hourly	0.035	0.178	0.004	0.17	0.0376

\*Actual Emissions to be determined by source test.

Additional NOx and CO emissions are generated during normal operation of the afterburner. Based on experience with similar equipment the emissions are:

$$2 \text{ ppm NOx ft}^3/\text{ft}^3 \times 18,000 \text{ ft}^3/\text{min} \times 60 \text{ min/hr} \times 46 \text{ lbNO}_2/\text{mole} \times 1 \text{ mole}/379 \text{ ft}^3 = 0.258 \text{ lb/hr}$$

$$2 \text{ ppm CO ft}^3/\text{ft}^3 \times 18,000 \text{ ft}^3/\text{min} \times 60 \text{ min/hr} \times 28 \text{ lbNO}_2/\text{mole} \times 1 \text{ mole}/379 \text{ ft}^3 = 0.156 \text{ lb/hr}$$

The maximum emissions would be from a cold start of the RTO, assume 3 hrs/day, with the remaining 21 hrs/day @ 2 ppm NOx. Normally, starting from a cold start will not occur daily, or even weekly.

$$\text{NOx R2 max lb/day} = (3 \text{ hr/day} \times 0.178 \text{ lb/hr}) + (21 \text{ hr/day} \times 0.258 \text{ lb/hr}) = 5.95 \text{ lb/day (0.24 lb/hr)}$$

$$\text{CO R2 max lb/day} = (3 \text{ hr/day} \times 0.17 \text{ lb/hr}) + (21 \text{ hr/day} \times 0.156 \text{ lb/hr}) = 3.78 \text{ lb/day (0.157 lb/hr)}$$

**SPRAY BOOTHS AND OVEN EMISSION (A/NOS: 542861, 542974, 542860):**

**OPERATING HOURS:**

Average: 10 hrs/day, 6 days/week, 50 weeks/year.

Maximum: 12 hrs/day, 6 days/week, 50 weeks/year.

**Spray Booths,**

The company currently operates under a facility limit of 98 lb VOC per day. The two spray booths are currently limited to maximum emission of combined 39 lb VOC/day. Since the spray booths will be vented to thermal oxidizer, the applicant requested to remove this condition.

The proposed venting of the two spray booths to the thermal oxidizer will not result in an emission increase from the facility. NSR and AEIS emissions will be entered as calculated before.

**TAC:**

According to the Material Safety Data Sheets (MSDS) that were submitted with these applications, Robinson Helicopter will be spraying coatings that do not contain any chromium compounds, but will contain other toxic compounds identified in Table 1 of Rule 1401 (effective date 9/10/10).

The facility will continue using Desoprime CF/CA 7502 Primer which has maximum toxic concentrations of ethyl benzene of 1%. Spray booths # 6 & 7 and the oven will be vented to RTO. The thermal oxidizer is expected to have minimum 95% efficiency. No toxic emissions increase is expected from this modification.

Please see attachment for EPA Method 204 (PTE) Evaluation for spray booths and oven to be vented to the RTO:

**RULE 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 equipment is not located within 1000 feet of any schools. Therefore, public notice distribution will not be required under this section.

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

This section requires a public notice for all new or modified facilities, which have on-site emission increases exceeding any of the daily maximum as specified in subdivision (g).

The proposed project will not result in an emission increase for the entire facility that will exceed the daily maximum as specified under 212(g). The modification of spray booths and oven to be vented to RTO will not cause an increase from the facility that will exceed the threshold limits specified in 212(g). A Rule 212(c)(2) notice will not be triggered.

	Maximum Daily Emissions					
	<u>ROG</u>	<u>NO<sub>x</sub></u>	<u>PM<sub>10</sub></u>	<u>SO<sub>2</sub></u>	<u>CO</u>	<u>Pb</u>
Emission increase	0	0	0	0	0	0
MAX Limit (lb/day)	<b>30</b>	<b>40</b>	<b>30</b>	<b>60</b>	<b>220</b>	<b>3</b>

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Compliance Status	Yes	Yes	Yes	Yes	Yes	Yes
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**PARAGRAPH 212(c)(3):**

Public notice is not required – there will be no emission increase. Compliance is expected.

**Rule 401:** Compliance is expected. Visible emissions are not expected with the proper operation of the equipment.

**Rule 402:** Compliance is expected. Nuisance is not expected with the proper operation of the equipment, no complaints on file.

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

The facility is using compliant coatings, solvents and HVLP spray guns in the spray booths. Cleaning operation is subject to Rule 1171. Compliance with this rule is expected.

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

The facility has a daily VOC limit of 98 lb VOC/day, which results in a facility VOC PTE less than 20 tons per year. Therefore the facility is not subject to the requirements of this rule.

**Rule 1303(a):** The spray booths and oven will be vented to the RTO in compliance with BACT for VOC. The RTO will control VOC emissions with an overall efficiency of at least 95%, and is considered BACT. The RTO, oven and heaters associated with the spray booths are equipped with Low-NOx burners guaranteed by the manufacturer to meet 30 ppmv NOx. Compliance with rule is expected.

**Rule 1303(b)(1):** Modeling is not required for VOC. PM10 emissions from modification of spray booths, and oven to be vented to RTO is less than 0.41 lbs/hr (Table A-1 limit for non-combustion sources). Therefore further modeling analysis is not required.

**Rule 1303(b)(2):** The proposed modification of the spray booths and oven by the venting to the RTO will not result in an emission increase. Therefore, no offsets will be required.

**Rule 1303(b)(4):** The facility is expected to be in full compliance with all applicable rules and regulations of the District.

**Rule 1303(b)(5)(A) & 1303(b)(5)(D):** The proposed project does not qualify as a major modification at a major polluting facility. Further, the proposed project is exempt from CEQA according to the responses Robinson 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 1401, TOXICS**

Rule 1401 contains the following requirements:

- 1) *(d)(1) MICR and Cancer Burden* - The cumulative increase in MICR which is the sum of the calculated MICR values for all toxic air contaminants emitted from the new, relocated or modified permit unit will not result in any of the following:
  - (A) an increased MICR greater than one in one million ( $1.0 \times 10^{-6}$ ) at any receptor location, if the permit unit is constructed without T-BACT;
  - (B) an increased MICR greater than ten in one million ( $1.0 \times 10^{-5}$ ) at any receptor location, if the permit unit is constructed with T-BACT;
  - (C) a cancer burden greater than 0.5.
  
- 2) *(d)(2) Chronic Hazard Index* - The cumulative increase in total chronic HI for any target organ system due to total emissions from the new, relocated or modified permit unit will not exceed 1.0 at any receptor location.
  
- 3) *(d)(3) Acute Hazard Index* - The cumulative increase in total acute HI for any target organ system due to total emissions from the new, relocated or modified permit unit will not exceed 1.0 at any receptor location.

Emissions from the spray booths and oven will be vented to a thermal oxidizer with an overall control efficiency of minimum 95%. In addition, the emissions from the spray booths are bubbled under the existing facility cap for VOC. As a result, the proposed project will not cause an increase in toxics emissions. Compliance with this rule is expected.

**REGULATION XXX:**

This facility is not in the RECLAIM program. The proposed project is considered as a “de minimis significant permit revision” to the Title V permit for this facility.

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 hazardous air pollutants (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
PM10	30
SOx	60
CO	220

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 second permit revision to the Title V renewal permit issued to this facility on March 27, 2012.

The following table summarizes the cumulative emission increases resulting from all permit revisions since the Title V renewal permit was issued:

<b>Revision</b>	<b>HAP</b>	<b>VOC</b>	<b>NO<sub>x</sub></b>	<b>PM<sub>10</sub></b>	<b>SO<sub>x</sub></b>	<b>CO</b>
Previous revision	0	0	2	0	0	1
2 <sup>nd</sup> . Permit Revision, modification of two spray booth and one oven to be vented to the RTO	0	0	0	0	0	0
Cumulative Total	<b>0</b>	<b>0</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>1</b>
Maximum Daily	30	30	40	30	60	220

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”.

### **RECOMMENDATIONS**

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). If EPA does not raise any objections within the review period, a revised Title V permit will be issued to this facility.

### **Permit Conditions:**

#### Thermal Oxidizer

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.  
[RULE 204]
2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.  
[RULE 204]
3. THIS EQUIPMENT SHALL BE IN OPERATION WHENEVER THE EQUIPMENT IT SERVES IS IN OPERATION.  
[RULE 1303(a)(1)-BACT]
4. 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

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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.

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 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 PURSUANT TO THE REQUIREMENTS SPECIFIED IN 40 CFR PART 64.9 AND CONDITION NOS. 22 AND 23 IN SECTION K OF THIS PERMIT. THE 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 1303(a)(1)-BACT, RULE 3004(a)(4)-PERIODIC MONITORING, 40CFR Part 64]

5. THE TEMPERATURE INDICATOR AND A DATA RECORDER SHALL BE IN OPERATION WHENEVER THE EQUIPMENT IT SERVES IS IN OPERATION.  
[RULE 1303(a)(1)-BACT]
6. THE TEMPERATURE INDICATOR SHALL BE PROPERLY CALIBRATED AND MAINTAINED IN GOOD OPERATING CONDITION.  
[RULE 1303(a)(1)-BACT]
7. ALL ACCESS DOORS TO THE PERMANENT TOTAL ENCLOSURES SHALL BE KEPT CLOSED DURING NORMAL OPERATIONS.  
[RULE 1303(a)(1)-BACT]
8. THE OPERATOR SHALL OPERATE AND MAINTAIN THIS EQUIPMENT TO ACHIEVE A VOC DESTRUCTION EFFICIENCY OF AT LEAST 95% BY WEIGHT WHENEVER THE EQUIPMENT IT

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SERVES IS IN OPERATION.  
 [RULE 1303(a)(1)-BACT, 1303(b)(2)-OFFSET]

- 9. THE OPERATOR SHALL OPERATE AND MAINTAIN THIS EQUIPMENT TO ACHIEVE AN OVERALL VOC CONTROL EFFICIENCY OF AT LEAST 95%.  
 [RULE 1303(a)(1)-BACT, 1303(b)(2)-OFFSET]
  
- 10. THE OWNER OR OPERATOR OF THIS EQUIPMENT SHALL CONDUCT SOURCE TESTS UNDER THE FOLLOWING CONDITIONS TO DEMONSTRATE COMPLIANCE WITH THE PERMIT CONDITIONS:
  - A. THE SOURCE TESTS SHALL BE CONDUCTED NO LATER THAN 180 DAYS AFTER THE MODIFICATION AND INITIAL START-UP OF VENTILATION OF THE TWO SPRAY BOOTHS NOS: 6 & 7 (A/NOS: 542861 & 542974), AND OVEN (A/NO: 542860) TO THE REGENERATIVE THERMAL OXIDIZER IS COMPLETE UNLESS OTHERWISE APPROVED IN WRITING BY THE DISTRICT.
  
  - B. A SOURCE TEST PROTOCOL SHALL BE SUBMITTED TO THE DISTRICT ENGINEER, NO LATER THAN 60 DAYS AFTER THE INITIAL START-UP OF THE REGENERATIVE THERMAL OXIDIZER UNLESS OTHERWISE APPROVED IN WRITING BY THE DISTRICT. THE TEST PROTOCOL SHALL BE APPROVED IN WRITING BY THE DISTRICT BEFORE THE TEST COMMENCES. THE TEST PROTOCOL SHALL INCLUDE THE COMPLETED DISTRICT FORMS ST-1 AND ST-2 SPECIFYING THE PROPOSED OPERATING CONDITIONS OF THE EQUIPMENT DURING THE TEST, THE IDENTITY OF THE TESTING LABORATORY, A STATEMENT FROM THE TESTING LABORATORY CERTIFYING IT MEETS THE CRITERIA IN DISTRICT RULE 304(k), AND A DESCRIPTION OF THE SAMPLING AND ANALYTICAL PROCEDURES TO BE USED.
  
  - C. THE SOURCE TESTS SHALL CONSIST OF, BUT MAY NOT BE LIMITED TO, A TEST OF THE INLET AND EXHAUST OF THE REGENERATIVE THERMAL OXIDIZER FOR:
    - (1) VOLATILE ORGANIC COMPOUNDS (VOC) IN PPMV AND LBS/HR
    - (2) OXIDES OF NITROGEN (NO<sub>x</sub>) IN PPMV AND LBS/HR (OXIDIZER EXHAUST ONLY)
    - (3) CARBON MONOXIDE (CO) IN PPMV AND LBS/HR (OXIDIZER EXHAUST ONLY)
    - (4) VOC DESTRUCTION EFFICIENCY
    - (5) VOC-COLLECTION EFFICIENCY
    - (6) OXYGEN CONTENT
    - (7) MOISTURE CONTENT
    - (8) FLOW RATE
    - (9) TEMPERATURE
  
  - D. THE TEST SHALL BE CONDUCTED TO VERIFY THAT THE PERMANENT TOTAL ENCLOSURE (PTE) COMPLY WITH THE REQUIREMENTS UNDER EPA METHOD 204.
  
  - E. THE USAGE OF ALL VOC-CONTAINING MATERIALS (RESINS, COATINGS, SOLVENTS, ETC.),  
 [RULE 1303(a)(1)-BACT]

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11. THE SOURCE TEST SHALL BE CONDUCTED DURING NORMAL OPERATION WHILE THE OXIDIZER IS OPERATING AT A TEMPERATURE OF NOT LESS THAN THE MINIMUM OPERATING TEMPERATURE SPECIFIED IN THIS PERMIT. THE OPERATING TEMPERATURE IN THE COMBUSTION CHAMBER AND WHETHER OR NOT GAS INJECTION IS ON OR OFF SHALL BE RECORDED DURING THE ENTIRE TESTING PERIOD AND INCLUDED IN THE SOURCE TEST REPORT. IF THE OPERATING TEMPERATURE DURING THE SOURCE TEST IS GREATER THAN THE MINIMUM OPERATING TEMPERATURE SPECIFIED IN THIS PERMIT, THE MINIMUM OPERATING TEMPERATURE MAY BE INCREASED AT THE TIME A PERMIT TO OPERATE IS ISSUED TO REFLECT THE OPERATING TEMPERATURE DURING THE SOURCE TEST.
  - A. IN ADDITION TO THE TEST DURING NORMAL OPERATION, A SOURCE TEST FOR NO<sub>x</sub> AND CO EMISSIONS SHALL ALSO BE CONDUCTED DURING THE START-UP OF THE OXIDIZER (WHEN THE START-UP BURNER IS OPERATING) BEFORE THE PROCESS AIR STREAM FROM THE COATING OPERATIONS IS INTRODUCED INTO THE OXIDIZER.
  - B. A WRITTEN NOTICE OF THE SOURCE TESTS SHALL BE SUBMITTED TO THE DISTRICT ENGINEER AT LEAST 14 DAYS PRIOR TO THE SOURCE TESTING DATE SO THAT AN OBSERVER FROM THE DISTRICT MAY BE PRESENT.
  - C. TWO COMPLETE COPIES OF THE SOURCE TEST REPORT SHALL BE SUBMITTED TO THE DISTRICT ENGINEER WITHIN 45 DAYS AFTER THE SOURCE TESTING DATE. THE SOURCE TEST REPORT SHALL INCLUDE, BUT MAY NOT BE LIMITED TO, ALL TESTING DATA REQUIRED BY THIS PERMIT.
  - D. A TESTING LABORATORY CERTIFIED BY THE CALIFORNIA AIR RESOURCES BOARD IN THE REQUIRED TEST METHODS FOR CRITERIA POLLUTANTS TO BE MEASURED, AND IN COMPLIANCE WITH DISTRICT RULE 304 (NO CONFLICT OF INTEREST) SHALL CONDUCT THE TESTS.
  - E. SAMPLING FACILITIES SHALL COMPLY WITH THE DISTRICT GUIDELINES FOR CONSTRUCTION OF SAMPLING AND TESTING FACILITIES, PURSUANT TO RULE 217. [RULE 1303(a)(1)-BACT]
  
12. THE OWNER OR OPERATOR OF THIS EQUIPMENT SHALL SUBMIT THE RESULTS OF ALL TESTS (INCLUDING PRELIMINARY TESTS) THAT ARE CONDUCTED ON THIS EQUIPMENT FOR INFORMATIONAL PURPOSES TO THE DISTRICT ENGINEER WITHIN 45 DAYS AFTER THE TESTING DATE. [RULE 1303(a)(1)-BACT]

**Periodic Monitoring:**

13. THE OPERATOR SHALL CONDUCT SOURCE TEST(S) IN ACCORDANCE WITH THE FOLLOWING SPECIFICATIONS:
  - A. THE TEST SHALL BE CONDUCTED AT LEAST ONCE DURING THE LIFE OF THE PERMIT.
  - B. THE TEST SHALL BE CONDUCTED NO LATER THAN FEBRUARY 4, 2016 UNLESS OTHERWISE APPROVED IN WRITING BY THE DISTRICT.
  - C. THE TEST SHALL BE CONDUCTED TO DETERMINE THE VOC EMISSIONS USING AN APPROVED DISTRICT METHOD TO DEMONSTRATE COMPLIANCE WITH ALL APPLICABLE PERMIT CONDITION(S), RULES AND REGULATIONS.
  - D. THE SOURCE TEST SHALL BE CONDUCTED WHILE THE OXIDIZER IS OPERATING AT A TEMPERATURE OF NOT LESS THAN THE MINIMUM OPERATING TEMPERATURE SPECIFIED IN THIS PERMIT. IF THE OPERATING TEMPERATURE DURING THE SOURCE TEST IS GREATER THAN THE MINIMUM OPERATING TEMPERATURE SPECIFIED IN THIS PERMIT, THE MINIMUM OPERATING TEMPERATURE SPECIFIED IN THIS PERMIT

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MAY BE INCREASED TO REFLECT THE OPERATING TEMPERATURE DURING THE SOURCE TEST.

- E. THE OPERATOR SHALL COMPLY WITH ADMINISTRATIVE CONDITIONS NOs. 8, 9, AND 10 OF SECTION E OF THIS FACILITY PERMIT.
- F. THE OPERATOR SHALL SUBMIT TWO COMPLETE COPIES OF THE SOURCE TEST REPORT SPECIFIED IN CONDITION NO. 9 OF SECTION E OF THIS FACILITY PERMIT TO THE DISTRICT ENGINEERING AND COMPLIANCE DIVISION. THE ENGINEERING COPY OF THE REPORT SHALL BE SENT TO: SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT, COATING, PRINTING AND AEROSPACE OPERATIONS, ATTN: AIR QUALITY AND COMPLIANCE SUPERVISOR, 21865 COPLEY DRIVE, DIAMOND BAR, CA 91765. THE COMPLIANCE COPY OF THE REPORT SHALL BE SENT TO: SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT, P.O. BOX 4941, DIAMOND BAR, CA 91765  
[RULE 3004(a)(4)]

**Emissions and Requirements:**

- 14. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS:
  - CO: 2000 PPMV, RULE 407
  - PM: 0.1 GR/SCF, RULE 409
  - PM: RULE 404, SEE APPENDIX B FOR EMISSION LIMITS
  - NOx: 60 PPMV, RULE 1147
  - NOx: 30 PPMV, RULE 1303(a)(1)-BACT

**Spray Booths Nos.6 & 7**

- 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.  
[RULE 204]
- 2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.  
[RULE 204]
- 3. THIS EQUIPMENT SHALL NOT BE OPERATED UNLESS IT IS VENTED TO AN AIR POLLUTION CONTROL SYSTEM WHICH HAS BEEN ISSUED A VALID PERMIT BY THE EXECUTIVE OFFICER.  
[RULE 1303(a)(1)-BACT]
- 4. THE OPERATOR SHALL MAINTAIN THIS EQUIPMENT AS A PERMANENT TOTAL ENCLOSURE (PTE) AND COMPLY WITH ALL CRITERIA SPECIFIED IN EPA METHOD 204.  
[RULE 1303(a)(1)-BACT]
- 5. THIS SPRAY BOOTH SHALL NOT BE OPERATED UNLESS ALL EXHAUST AIR PASSES THROUGH THREE STAGES FILTER MEDIA.  
[RULE 1303(a)(1)-BACT]
- 6. A GAUGE SHALL BE INSTALLED TO INDICATE IN INCHES OF WATER THE STATIC PRESSURE DIFFERENTIAL ACROSS THE EXHAUST FILTERS. IN OPERATION, THE PRESSURE DIFFERENTIAL SHALL NOT EXCEED 1.85 INCHES OF WATER.  
[RULE 1303(a)(1)-BACT]

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7. MATERIALS USED IN THIS EQUIPMENT SHALL NOT CONTAIN ANY TOXIC AIR CONTAMINANTS LISTED IN TABLE 1 IN RULE 1401, AS AMENDED SEPTEMBER 10, 2010, OR EARLIER WITH THE EXCEPTION OF ETHYL BENZENE (CAS NO. 100-41-4).  
[RULE 1401]
  
8. THE MAXIMUM ETHYL BENZENE CONCENTRATION IN MATERIALS USED IN THIS EQUIPMENT SHALL NOT EXCEED 1% BY WEIGHT.
  
9. IN ADDITION TO THE RECORDKEEPING REQUIREMENT OF RULE 109, THE OPERATOR SHALL KEEP ADEQUATE RECORDS FOR THIS EQUIPMENT TO VERIFY DAILY VOLATILE ORGANIC COMPOUND (VOC), EMISSIONS IN POUNDS AND THE VOC CONTENT OF EACH MATERIAL AS APPLIED (INCLUDING WATER AND EXEMPT COMPOUNDS). ALL RECORDS SHALL BE PREPARED IN A FORMAT WHICH IS ACCEPTABLE TO THE DISTRICT, SHALL BE RETAINED ON THE PREMISES FOR AT LEAST FIVE YEARS, AND SHALL BE MADE AVAILABLE UPON REQUEST OF THE EXECUTIVE OFFICER OR HIS REPRESENTATIVE.  
[RULE 1303(b)(2)-OFFSET]
  
10. THE OPERATOR SHALL TEST THIS EQUIPMENT IN ACCORDANCE WITH THE FOLLOWING SPECIFICATIONS:
  - A. THE SOURCE TEST SHALL BE CONDUCTED NO LATER THAN 180 DAYS AFTER THE INITIAL START-UP OF THIS EQUIPMENT AFTER THE MODIFICATION IS COMPLETE UNLESS OTHERWISE APPROVED IN WRITING BY THE DISTRICT.
  - B. A SOURCE TEST PROTOCOL SHALL BE SUBMITTED TO THE DISTRICT NO LATER THAN 60 DAYS AFTER THE INITIAL START-UP OF THIS EQUIPMENT UNLESS OTHERWISE APPROVED IN WRITING BY THE DISTRICT. THE TEST PROTOCOL SHALL BE APPROVED IN WRITING BY THE DISTRICT BEFORE THE TEST COMMENCES.
  - C. THE TEST PROTOCOL SHALL INCLUDE THE PROPOSED OPERATING CONDITIONS OF THE EQUIPMENT DURING THE TEST, THE IDENTITY OF THE TESTING LABORATORY, A STATEMENT FROM THE TESTING LABORATORY CERTIFYING THAT IT MEETS THE CRITERIA IN DISTRICT RULE 304(K), AND A DESCRIPTION OF THE SAMPLING AND ANALYTICAL PROCEDURES TO BE USED.
  - D. THE SOURCE TESTS SHALL CONSIST OF, BUT MAY NOT BE LIMITED TO, TESTING OF THE BURNER NO<sub>x</sub> AND CO EMISSIONS, REFERENCED AT 3 PERCENT VOLUME STACK GAS OXYGEN ON A DRY BASIS, DURING AS-FOUND OPERATING CONDITIONS OF EACH BURNER.
  - E. THE SOURCE TESTS SHALL CONSIST OF, BUT MAY NOT BE LIMITED TO, TESTING OF THE BURNER NO<sub>x</sub> AND CO EMISSIONS, REFERENCED AT 3 PERCENT VOLUME STACK GAS OXYGEN ON A DRY BASIS, WHILE THE BURNER IS OPERATED BELOW 35% OF THE MAXIMUM RATED INPUT HEAT CAPACITY.
  - F. NO<sub>x</sub> AND CO EMISSION DETERMINATION SHALL BE AVERAGED OVER A PERIOD OF AT LEAST 15 AND NO MORE THAN 60 CONSECUTIVE MINUTES, AND AT LEAST 15 MINUTES AFTER UNIT START-UP.
  - G. A WRITTEN NOTICE OF THE SOURCE TESTS SHALL BE SUBMITTED TO THE DISTRICT AT LEAST 14 DAYS PRIOR TO THE SOURCE TESTING DATE SO THAT AN OBSERVER FROM THE DISTRICT MAY BE PRESENT.
  - H. TWO COMPLETE COPIES OF THE SOURCE TEST REPORT SHALL BE SUBMITTED TO THE DISTRICT WITHIN 45 DAYS AFTER SOURCE TESTING DATE UNLESS OTHERWISE APPROVED IN WRITING BY THE DISTRICT. THE SOURCE TEST REPORT SHALL INCLUDE, BUT MAY NOT BE LIMITED TO, ALL TESTING DATA REQUIRED BY THIS CONDITION.
  - I. A TESTING LABORATORY CERTIFIED BY THE CALIFORNIA AIR RESOURCES BOARD IN THE REQUIRED TEST METHODS FOR THE CRITERIA POLLUTANTS TO BE MEASURED,

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AND IN COMPLIANCE WITH DISTRICT RULE 304 (NO CONFLICT OF INTEREST) SHALL CONDUCT THE TEST.

- J. SAMPLING FACILITIES SHALL COMPLY WITH THE DISTRICT GUIDELINES FOR CONSTRUCTION OF SAMPLING AND TESTING FACILITIES, PURSUANT TO RULE 217.
- K. THE RESULTS OF ALL TESTS (INCLUDING PRELIMINARY TESTS) THAT ARE CONDUCTED ON THIS EQUIPMENT FOR INFORMATIONAL PURPOSES SHALL BE SUBMITTED TO THE DISTRICT WITHIN 45 DAYS AFTER THE TESTING DATE UNLESS OTHERWISE APPROVED IN WRITING BY THE DISTRICT.  
[RULE 1147]

**Periodic Monitoring:**

- 11. 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. THE OPERATOR SHALL KEEP RECORDS, IN A MANNER APPROVED BY THE DISTRICT, FOR THE FOLLOWING PARAMETER(S) OR ITEM(S):
  - A. THE NAME OF THE PERSON PERFORMING THE INSPECTION AND/OR MAINTENANCE OF THE FILTER MEDIA;
  - B. THE DATE, TIME AND RESULTS OF THE INSPECTION; AND
  - C. THE DATE, TIME AND DESCRIPTION OF ANY MAINTENANCE OR REPAIRS RESULTING FROM THE INSPECTION.

[RULE 3004 (a)(4)]

- 12. THE OPERATOR SHALL DETERMINE AND RECORD THE PRESSURE DROP ACROSS THE FILTER ONCE EVERY WEEK.

[RULE 3004 (a)(4)]

**Emissions And Requirements:**

- 13. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS:

- VOC: RULE 1124, SEE APPENDIX B FOR EMISSION LIMITS
- VOC: RULE 1171, SEE APPENDIX B FOR EMISSION LIMITS
- VOC: RULE 109
- HAP: 40 CFR 63 SUBPART GG, SEE SECTION J FOR REQUIREMENTS
- CO: 2000 PPM, RULE 407
- PM: RULE 404, SEE APPENDIX B FOR EMISSION LIMITS
- PM: 0.1 GR/SCF, RULE 409
- PM: RULE 481
- NOx: 30 PPMV, RULE 1147

**Drying Oven, Marathon**

- 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.  
[RULE 204]
- 2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.  
[RULE 204]

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3. THIS EQUIPMENT SHALL NOT BE OPERATED UNLESS IT IS VENTED TO AN AIR POLLUTION CONTROL SYSTEM WHICH HAS BEEN ISSUED A VALID PERMIT BY THE EXECUTIVE OFFICER.  
[RULE 1303(a)(1)-BACT]
  
4. THE OPERATOR SHALL MAINTAIN THIS EQUIPMENT AS A PERMANENT TOTAL ENCLOSURE (PTE) AND COMPLY WITH ALL CRITERIA SPECIFIED IN EPA METHOD 204.  
[RULE 1303(a)(1)-BACT]
  
5. THE OPERATOR SHALL TEST THIS EQUIPMENT IN ACCORDANCE WITH THE FOLLOWING SPECIFICATIONS:
  - A. THE SOURCE TEST SHALL BE CONDUCTED NO LATER THAN 180 DAYS AFTER THE INITIAL START-UP OF THIS EQUIPMENT AFTER THE MODIFICATION IS COMPLETE UNLESS OTHERWISE APPROVED IN WRITING BY THE DISTRICT.
  - B. A SOURCE TEST PROTOCOL SHALL BE SUBMITTED TO THE DISTRICT NO LATER THAN 60 DAYS AFTER THE INITIAL START-UP OF THIS EQUIPMENT UNLESS OTHERWISE APPROVED IN WRITING BY THE DISTRICT. THE TEST PROTOCOL SHALL BE APPROVED IN WRITING BY THE DISTRICT BEFORE THE TEST COMMENCES.
  - C. THE TEST PROTOCOL SHALL INCLUDE THE PROPOSED OPERATING CONDITIONS OF THE EQUIPMENT DURING THE TEST, THE IDENTITY OF THE TESTING LABORATORY, A STATEMENT FROM THE TESTING LABORATORY CERTIFYING THAT IT MEETS THE CRITERIA IN DISTRICT RULE 304(K), AND A DESCRIPTION OF THE SAMPLING AND ANALYTICAL PROCEDURES TO BE USED.
  - D. THE SOURCE TESTS SHALL CONSIST OF, BUT MAY NOT BE LIMITED TO, TESTING OF THE BURNER NO<sub>x</sub> AND CO EMISSIONS, REFERENCED AT 3 PERCENT VOLUME STACK GAS OXYGEN ON A DRY BASIS, DURING AS-FOUND OPERATING CONDITIONS OF EACH BURNER.
  - E. THE SOURCE TESTS SHALL CONSIST OF, BUT MAY NOT BE LIMITED TO TESTING OF THE BURNER NO<sub>x</sub> AND CO EMISSIONS, REFERENCED AT 3 PERCENT VOLUME STACK GAS OXYGEN ON A DRY BASIS, WHILE THE BURNER IS OPERATED BELOW 35% OF THE MAXIMUM RATED INPUT HEAT CAPACITY.
  - F. NO<sub>x</sub> AND CO EMISSION DETERMINATION SHALL BE AVERAGED OVER A PERIOD OF AT LEAST 15 AND NO MORE THAN 60 CONSECUTIVE MINUTES, AND AT LEAST 15 MINUTES AFTER UNIT START-UP.
  - G. A WRITTEN NOTICE OF THE SOURCE TESTS SHALL BE SUBMITTED TO THE DISTRICT AT LEAST 14 DAYS PRIOR TO THE SOURCE TESTING DATE SO THAT AN OBSERVER FROM THE DISTRICT MAY BE PRESENT.
  - H. TWO COMPLETE COPIES OF THE SOURCE TEST REPORT SHALL BE SUBMITTED TO THE DISTRICT WITHIN 45 DAYS AFTER SOURCE TESTING DATE UNLESS OTHERWISE APPROVED IN WRITING BY THE DISTRICT. THE SOURCE TEST REPORT SHALL INCLUDE, BUT MAY NOT BE LIMITED TO, ALL TESTING DATA REQUIRED BY THIS CONDITION.
  - I. A TESTING LABORATORY CERTIFIED BY THE CALIFORNIA AIR RESOURCES BOARD IN THE REQUIRED TEST METHODS FOR THE CRITERIA POLLUTANTS TO BE MEASURED, AND IN COMPLIANCE WITH DISTRICT RULE 304 (NO CONFLICT OF INTEREST) SHALL CONDUCT THE TEST.
  - J. SAMPLING FACILITIES SHALL COMPLY WITH THE DISTRICT GUIDELINES FOR CONSTRUCTION OF SAMPLING AND TESTING FACILITIES, PURSUANT TO RULE 217.
  - K. THE RESULTS OF ALL TESTS (INCLUDING PRELIMINARY TESTS) THAT ARE CONDUCTED ON THIS EQUIPMENT FOR INFORMATIONAL PURPOSES SHALL BE

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SUBMITTED TO THE DISTRICT WITHIN 45 DAYS AFTER THE TESTING DATE UNLESS OTHERWISE APPROVED IN WRITING BY THE DISTRICT.  
[RULE 1147]

**Emissions and Requirements:**

- 6. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS:
  - CO: 2000 PPM, RULE 407
  - PM: 0.1 gr/scf, RULE 409
  - PM: RULE 404, SEE APPENDIX B FOR EMISSION LIMITS
  - NOx: 30 PPM, RULE 1147