

South Coast Air Quality Management District

Statement of Basis

Proposed Title V Renewal Permit

Facility Name:	The Boeing Company-C17 Program
Facility ID:	800038
SIC Code:	3721
Equipment Location:	2401 E Wardlow Road Long Beach, CA 90807
Application #(s):	528589
Application Submittal Date(s):	10/26/2011
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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 requested 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. NO₂, SO₂, CO, 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 renewal permit is proposed to be issued to cover the operations of The Boeing Company-C17 Program, located at 2401 E. Wardlow Road, Long Beach, CA 90807. This facility is subject to Title V requirements because it is a major source.

2. Facility Description

This is an existing facility applying for a Title V permit renewal that is engaged in the manufacturing of aircraft. The facility operates spray booths, boilers, emergency and non-emergency internal combustion engines, a storage tank, and other supporting equipment.

3. Construction and Permitting History

The facility has been in constant operation with a Title V permit at this location since 2003. Numerous permits to construct and or permits to operate have been issued to the facility since January 2003. A Title V permit renewal was issued to the facility on January 20, 2008.

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, Section 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.

The facility is subject to the requirements of 40CFR63 Subpart GG-National Emission Standards for Hazardous Air Pollutants: Aerospace Manufacturing and Rework Facilities. The requirements of this NESHAP are reflected in the Title V permit.

Some of the emergency engines at the facility are subject to the requirements of 40CFR60, Subpart IIII-Standards of Performance for Stationary Compression Ignition Internal Combustion Engines. In addition, the facility is an area source under 40CFR63 Subpart ZZZZ-National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. The requirements of the regulations are reflected in the permit.

There are three compression ignition emergency engines at the facility that are considered new engines under 40CFR63 Subpart ZZZZ because they were installed after June 12, 2006. These engines comply with the NESHAP by complying with 40CFR60 Subpart IIII requirements. The requirements of the NSPS such as the emission limits, use of ultra low sulfur diesel (15 ppmw), installation of non-resettable hour meter, and recordkeeping are specified in the permit condition for the affected engines.

The facility also operates 13 existing emergency engines that are subject to the NESHAP. The requirements of the NESHAP such as changing the oil and filter, inspecting the air cleaner, inspection of all hoses and belts, installation of a non-resettable hour meter, maintaining the engine according to the manufacturer's specification, and reporting and recordkeeping requirements are specified in the permit.

In addition the facility is subject to the requirements of 40CFR63 Subpart DDDDD-National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters. The facility operates three boilers that are natural gas fired firetube boilers and two boilers that are natural gas fired watertube boilers. However, the boilers are currently not subject to any emission limits, work practice standards, or performance testing requirements under this regulation.

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, Section D, F, and J and Appendix B of the proposed Title V permit). Discussion of any applicable operational requirements can be found in the Engineering Evaluations. All periodic monitoring requirements were developed using strict adherence to the following applicable guidance documents: SCAQMD Periodic Monitoring Guidelines for Title V Facilities (November 1997); CAPCOA/CARB/EPA Region IX Periodic Monitoring Recommendations for Generally Applicable Requirements in SIP (June 1999); and CAPCOA/CARB/EPA Region IX Recommended Periodic Monitoring for Generally Applicable Grain Loading Standards in the SIP: Combustion Sources (July 2001).

Since the facility complies with applicable rules requirements and emission limits without the use of air pollution control equipment, the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 are not applicable to this facility.

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 2011**

Pollutant	Emissions (tons/year)
NOx	6.151
CO	4.101
VOC	19.185
PM	6.328
SOx	0.221

**Toxic Air Contaminants Emissions (TAC)
Annual Reported Emissions for Reporting Period 2011**

The Following TACs Were Reported	Emissions (lbs/yr)
1,1,2,2-Tetrachloroethane	0.001
1,1,2Triclethan	0.001
1,2,4Trimebenze	0.137
1,2-Dichloropropane {Propylene dichloride}	0.001
1,3-Butadiene	0.996
1,3-Dichloropropene	0.001
Acetaldehyde	3.505
Acrolein	0.322
Ammonia	160.135
Arsenic	0.006
Asbestos	0.001
Benzene	1.455
Cadmium	0.006
Carbon tetrachloride	0.001
Chlorine	0.044
Chloroform	0.001
Chromium (VI)	0.560
Copper	0.017
Crystalline silica	0.025
Diesel engine exhaust, particulate matter	138.342
Dipropylene glycol monomethyl ether	16.462
Ethyl Benzene	64.892
Ethylene dibromide	0.001
Ethylene dichloride	0.001
Ethylene glycol monobutyl ether	0.700
Ethylene glycol monopropyl ether	1.266

The Following TACs Were Reported	Emissions (lbs/yr)
Formaldehyde	37.041
Hexane	0.485
Hexamethylene-1,6-diisocyanate	0.008
Hydrochloric acid	0.769
Lead (inorganic)	0.034
M-Xylene	0.485
ME T-Butylether	0.203
Manganese	0.013
Mercury	0.008
Methanol	0.219
Methyl ethyl ketone	17.808
Methyl isobutyl ketone {Hexone}	181.775
Methylene chloride	1.057
Naphthalene	0.111
Nickel	0.016
PAHs, total, with components not reported	0.154
Propylene glycol monomethyl ether	8.921
Propylene glycol monomethyl ether acetate	24.869
Selenium	0.009
Styrene	0.014
Toluene	142.625
Vinyl chloride	0.001
Xylenes	141.085
o-Xylene	0.169

Health Risk from Toxic Air Contaminants

The facility is subject to review by the Air Toxics Information and Assessment Act (AB2588). The Final Facility Health Risk was approved in 1999 with the following risk factors.

Cancer Risk	4.8 in one million
Acute Hazard Index	0.15
Chronic Hazard Index	0.11

8. Compliance History

As noted, the facility has been in constant operation with a Title V permit since 2003. The facility has been subject to both self-reporting requirements and AQMD inspections. The facility has had no citizen complaints filed, Notices to Comply or Notices of Violation issued in the last two years. The facility is currently operating in compliance with all applicable rules and permit conditions.

9. Compliance Certification

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