

# South Coast Air Quality Management District

## Statement of Basis

### Proposed Title V Renewal Permit

**Facility Name:** Lamps Plus Inc./Pacific Coast Lighting Inc.  
**Facility ID:** 800428  
**SIC Code:** 3645  
**Equipment Location:** 20250 Plummer Street  
Chatsworth, CA 91311

**Application #(s):** 543900  
**Application Submittal Date(s):** 10/16/2012

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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. NO<sub>2</sub>, SO<sub>2</sub>, 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 Lamps Plus Inc./Pacific Coast Lighting, Inc., located at 20250 Plummer Street, Chatsworth, CA 91311. 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 decorative lighting products manufacturing. The facility operates spray booths, emergency diesel fired internal combustion engines, 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 2008. A Title V permit issued to the facility on July 28, 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 permitted to operate two diesel fired emergency internal combustion engines that 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 engines are considered as new engines under 40CFR63 Subpart ZZZZ because they were constructed after June 12, 2006. The 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 conditions for the affected engines.

## **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 2012**

Pollutant	Emissions (tons/year)
NO <sub>x</sub>	0
CO	0
VOC	0.185
PM	0.02
SO <sub>x</sub>	0

### **Toxic Air Contaminants Emissions (TAC)**

No TAC's were reported for reporting period 2012.

### **Health Risk from Toxic Air Contaminants**

The facility is subject to review by the Air Toxics Information and Assessment Act (AB2588). The facility was determined to be exempt from the requirements of AB2588.

## **8. Compliance History**

As noted, the facility has been in constant operation with a Title V permit since 2008. The facility has been subject to both self-reporting requirements and AQMD inspections. The facility has had no citizen complaints filed or Notices of Violation issued in the last two years.

However, the facility was issued a Notice to Comply on 6/23/2011 requiring the applicant to submit the semi-annual compliance report for the period of January 1, 2010, through June 30, 2010. The applicant submitted the required report and 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.