

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING AND COMPLIANCE Coating, Printing and Aerospace Operations Team PERMIT APPLICATION EVALUATION	Page	1 of 12
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PERMIT TO CONSTRUCT EVALUATION
RTO (new construction), Spray Booths & Ovens (modification)

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

Application 545545:
 Title V Revision, deminimis significant

EQUIPMENT DESCRIPTION:

Application 546546, P/C Modification :

MODIFICATION TO DRYING OVEN, OPERATING UNDER PERMIT NO. D84916, A/N 294323
 CONSISTING OF:

DRYING OVEN, BINKS, BATCH TYPE, 10'-0" W. X 12'-4" L. X 8'-0" H., NATURAL GAS HEATED, 250,000 BTU/HR, WITH A 2,600-SCFM CIRCULATING FAN, AND A 600-SCFM EXHAUST FAN, FOR DRYING PAINTED HELICOPTER PARTS.

BY THE REPLACEMENT OF THE NATURAL GAS FIRED HEATER WITH:
 A 500,000 BTU/HR MIDCO LOW NOX NATURAL GAS-FIRED BURNER.

Application 547179, P/C Modification to Spray Booth under P/C A/N: 534350:

MODIFICATION TO SPRAY BOOTH #5, OPERATING UNDER TO CONSTRUCT A/N 534350
 CONSISTING OF:

SPRAY BOOTH # 5, SPRAY SYSTEM, MODEL NUMBER TB451612-PDT, AUTOMOTIVE TYPE, 22'-0" W. X 49'-10" L. X 13'-8" H., WITH THIRTY-EIGHT 20" X 20" INTAKE FILTERS, FORTY-SIX 20" X 20" ATI FIRST STAGE EXHAUST FILTERS, FORTY SIX 20" X 20" ATI OSM 100 SECOND STAGE EXHAUST FILTERS, FORTY-SIX 20" X 20" ATI A3000 THIRD STAGE EXHAUST FILTERS, ONE 15 H.P. RECIRCULATION BLOWER AND 200,000 BTU PER HOUR NATURAL GAS FIRED HEATER WITH INDIRECT HEAT EXCHANGER.

BY THE REMOVAL OF:
 THE VENTING OF THE SPRAY BOOTH TO THE EXISTING THERMAL OXIDIZER.

AND BY THE ADDITION OF:
 THE VENTING OF THE SPRAY BOOTH TO THE NEW THERMAL OXIDIZER.
 AND BY THE REPLACEMENT OF THE NATURAL GAS FIRED HEATER WITH:
 A 500,000 BTU/HR MIDCO LOW NOX NATURAL GAS-FIRED BURNER.

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Application 547181, P/C Modification to Spray Booth under P/C A/N: 534348:

MODIFICATION TO SPRAY BOOTH #1, OPERATING UNDER PERMIT TO CONSTRUCT A/N 534348
 CONSISTING OF:

SPRAY BOOTH #1, BINKS MODEL NUMBER CA-642-TLO, AUTOMOTIVE TYPE, 15'-1" W. X 49'-10" L. X 13'-6" H., WITH THIRTY-EIGHT 20" X 20" INTAKE FILTERS, FORTY-SIX 20" X 20" ATI FIRST STAGE EXHAUST FILTERS, FORTY SIX 20" X 20" ATI OSM 100 SECOND STAGE EXHAUST FILTERS, FORTY-SIX 20" X 20" ATI A3000 THIRD STAGE EXHAUST FILTERS, ONE 15 H.P. RECIRCULATION BLOWER, AND 200,000 BTU PER HOUR NATURAL GAS FIRED HEATER WITH INDIRECT HEAT EXCHANGER.

BY THE REMOVAL OF:

THE VENTING OF THE SPRAY BOOTH TO THE EXISTING THERMAL OXIDIZER.

AND BY THE ADDITION OF:

THE VENTING OF THE SPRAY BOOTH TO THE NEW THERMAL OXIDIZER.

AND BY THE REPLACEMENT OF THE NATURAL GAS FIRED HEATER WITH:

A 500,000 BTU/HR MIDCO LOW NOX NATURAL GAS-FIRED BURNER.

HISTORY:

The company submitted Application Nos. 546546, 547179 & 547181 for the modification of an oven and two spray booths. The modification consist of the replacement of the existing burners with larger low-NOx burners. A/N 546545 was submitted for the TV permit revision. The proposed Midco burners are guaranteed by the manufacturer to emit less than 30 ppmv NO_x at 3% O₂, in compliance with the Rule 1147 and BACT requirements. A source test will be required to verify the emissions after equipment installation.

The facility operates several spray booths, ovens, abrasive blasting equipment, baghouses, and an RTO. The facility currently operates under a facility VOC limit of 98 lb/day. The company is not proposing any changes to the facility VOC limit.

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 third 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.

The facility has been in constant operation with a Title V permit since 2002. 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.

PROCESS DESCRIPTION:

Robinson Helicopter is a manufacturer of helicopters and uses the spray booths to coat helicopter parts. The parts are dried in drying ovens, and some of the booths and ovens are

vented to a thermal oxidizer. The applicant is proposing to replace the burners with larger Low-Nox burners.

Emissions:

The proposed burners are guaranteed by Midco to emit less than 30 ppmv NO_x at 3% O₂, in compliance with Rule 1147 limit and BACT requirements.

Emission Factors (lb/mm ft ³)	VOC 7.0	NO _x 130	SO _x 0.83	CO 35	PM 7.6
30 ppmv		38.85*			

*For Low-NO_x burner. Actual Emissions to be determined by source test.

OPERATING HOURS:

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

Maximum: 24 hrs/day, 7 days/week, 52 weeks/year.

The following table summarizes the calculated emissions from the existing and proposed burners:

A/N 546546, change from 0.25 MMbtu/hr to 0.5 MMbtu/hr

Equipment	VOC	NO _x	SO _x	CO	PM10
Existing Oven lb/hr	0.0016	0.03	0.000197	0.0083	0.0018
Existing Oven lb/day	0.0399	0.74	0.0047	0.199	0.043
Modified Oven lb/hr	0.0033	0.0185	0.0004	0.0166	0.0036
Modified Oven lb/day	0.0799	0.44	0.009	0.399	0.087
Emission Changes lb/day	+0.04	-0.3	+0.0042	+0.2	+0.043

A/N 547179, 547181- spray booths No.5 and 1 each. Change from 0.2 MMbtu/hr to 0.5 MMbtu/hr

Equipment	VOC	NO _x	SO _x	CO	PM10
Existing SB lb/hr	0.0013	0.025	0.000157	0.0066	0.0014
Existing SB lb/day	0.0319	0.59	0.0038	0.16	0.034
Modified SB lb/hr	0.0033	0.0185	0.0004	0.0166	0.0036
Modified SB lb/day	0.0799	0.44	0.009	0.399	0.087
Emission Changes lb/day	+0.048	-0.15	+0.0052	+0.24	+0.053

Net emission increase due to the proposed project, lbs/day

Equipment	VOC	NO _x	SO _x	CO	PM10
Oven	+0.04	-0.3	+0.0042	+0.2	+0.043
Spray Booth No.5	+0.048	-0.15	+0.0052	+0.24	+0.053
Spray Booth No.1	+0.048	-0.15	+0.0052	+0.24	+0.053
Net emission increase	+0.136	-0.6	+0.0146	+0.68	+0.149

RULES/REGULATION EVALUATION:

RULE 212, PUBLIC NOTIFICATION

SUBPARAGRAPH 212(c)(1):

This section 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 replacement of the burner with a low NO_x burner 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_x</u>	<u>PM₁₀</u>	<u>SO₂</u>	<u>CO</u>	<u>Pb</u>
Emission increase	0	0	0	0	0	0
MAX Limit (lb/day)	30	40	30	60	220	3
Compliance Status	Yes	Yes	Yes	Yes	Yes	Yes

PARAGRAPH 212(c)(3):

Public notice is not required - increase in toxics emissions are negligible. MICR is less than 1 in a million, HIA/HIC less than one.

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 404, PARTICULATE MATTER - CONCENTRATION

Table 404(a) specifies limits of PM concentrations in an effluent gas stream at standard conditions, of which 0.01 grain/ft³ is the most stringent limit. The total PM concentration from the proposed equipment has been estimated to be negligible. Therefore, compliance is expected.

Rule 1147, NO_x REDUCTION

The proposed installation of low-NO_x burner from Midco has been guaranteed to emit less than 30 ppmv NO_x at 3% O₂. Compliance with this rule is expected.

Rule 1303(a): The replacement of the burners with Low-NOx burners guaranteed by the manufacturer to meet 30 ppmv NOx, will meet BACT requirements. Compliance with rule is expected.

Rule 1303(b)(1): Emissions increases from combustion of natural gas in the burners are below the Table A-1 allowable emissions for combustion sources less than or equal to 2 mm Btu/hr. Therefore further modeling analysis is not required.

Lb/hr (Calculated)	NOx	CO	PM ₁₀
A/N 546546	0.0185	0.016	0.0036
A/N 547179	0.0185	0.016	0.0036
A/N 547181	0.0185	0.016	0.0036
Rule 1303 Table A-1	0.2	11	1.2

Rule 1303(b)(2): The only emission increase from this project is due to the replacement of burner with a larger unit. Except for CO, the emission increases associated with the replacement of the burners are negligible. However, no emission offsets are required for CO since it is an attainment air contaminant.

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 1303(b)(5)(B): The Increase in emissions associated with the replacement of burner does not qualify as a major modification at an existing major polluting facility.

Rule 1303(b)(5)(C): A modeling analysis for plume visibility is not required since the net emission increase from the project does not exceed 15 ton/yr of PM10 or 40 ton/yr of NOx.

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 (1.0×10^{-6}) at any receptor location, if the permit unit is constructed without T-BACT;
 - (B) an increased MICR greater than ten in one million (1.0×10^{-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.

According to 1401(f)(3), the HIC and MICR for a modification are based on the difference in risk before and after the modification. The MICR and HIC are calculated by taking the difference between the pre and post modification emissions, and the HIA is calculated by accounting for the total emissions after the modification. The new burner is about two times larger as the previous one, so the risks would be twice (see attachment). The calculations resulted in the following:

	A/N 546546		A/N 547179 & 547181	
	Residential	Commercial	Residential	Commercial
Pre-modification	4.74E-09	1.64E-09	3.79E-09	1.31E-09
Post-modification	9.49E-09	3.27E-09	9.49E-09	3.27E-09
Δ MICR	+4.74E-09	+4.74E-09	+5.7E-09	+1.964E-09

The emissions from this burner will result in a Δ MICR, Δ HIC and HIA that are less than the limits of this rule. Compliance 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
NO _x	40
PM ₁₀	30
SO _x	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 third 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:

Revision	HAP	VOC	NO_x	PM₁₀	SO_x	CO
Previous permit revisions	0	0	2	0	0	1
3 rd . Permit Revision, modification of an oven and two spray booths by replacing the burners with low NO _x burner.	0	0	0	0	0	1
Cumulative Total	0	0	2	0	0	2
Maximum Daily	30	30	40	30	60	220

Since the cumulative emission increases resulting from permit revision 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 minimus 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:

A/N: 546546

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. THE OPERATOR SHALL TEST THIS EQUIPMENT IN ACCORDANCE WITH THE FOLLOWING SPECIFICATIONS:

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- A. THE SOURCE TEST SHALL BE CONDUCTED NO LATER THAN 180 DAYS AFTER THE MODIFICATION OF THE EQUIPMENT 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 MODIFICATION OF THE EQUIPMENT IS COMPLETE 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 EQUIPMENT NO_x AND CO EMISSIONS, REFERENCED AT 3 PERCENT VOLUME STACK GAS OXYGEN ON A DRY BASIS, AT THE MAXIMUM HEAT INPUT RANGE AT WHICH THE UNIT NORMALLY OPERATES.
- E. IF THE COMBUSTION DEVICE MAY OPERATE WITH VARIABLE HEAT INPUT THAT FALLS BELOW 50% RATED HEAT INPUT CAPACITY DURING NORMAL OPERATION, ADDITIONAL TESTING FOR NO_x AND CO EMISSIONS SHALL BE MADE USING A HEAT INPUT OF LESS THAN 35% OF THE RATED HEAT INPUT CAPACITY.
- F. NO_x 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 SUBMITTED TO THE DISTRICT WITHIN 45 DAYS AFTER THE TESTING DATE UNLESS OTHERWISE APPROVED IN WRITING BY THE DISTRICT.
- L. THE REPORT SHALL INCLUDE AT LEAST THE FOLLOWING (1) NO_x CONCENTRATION AND EMISSION RATE, IN PPM AND POUND PER HOUR, (2) CO CONCENTRATION AND EMISSION RATE, IN PPM AND POUND PER HOUR, (3) OXYGEN CONTENT, (4) MOISTURE CONTENT, (5) FLOW RATE, (6) EXHAUST TEMPERATURE, AND (7) NATURAL GAS CONSUMPTION RATE IN CUBIC FEET PER MINUTE.

[RULE 1147, 1303(a)(1)-BACT]

Periodic Monitoring:

- 4. 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

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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:

- A. 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
- B. 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:

- A. STACK OR EMISSION POINT IDENTIFICATION;
 - B. DESCRIPTION OF ANY CORRECTIVE ACTIONS TAKEN TO ABATE VISIBLE EMISSIONS;
 - C. DATE AND TIME VISIBLE EMISSION WAS ABATED; AND
 - D. VISIBLE EMISSION OBSERVATION RECORDED BY A CERTIFIED SMOKE READER.
- [RULE 3004 (a)(4)]

Emissions and Requirements:

- 5. 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 PPMV, RULE 1147
 NOx: 30 PPMV, RULE 1303(a)(1)-BACT

A/N: 547179 & 547181

- 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 SPRAY BOOTH SHALL NOT BE OPERATED UNLESS ALL EXHAUST AIR PASSES THROUGH THREE STAGES FILTER MEDIA.
[RULE 1303(a)(1)-BACT]
- 4. A GAUGE SHALL BE INSTALLED TO INDICATE IN INCHES OF WATER THE STATIC PRESSURE DIFFERENTIAL ACROSS THE EXHAUST FILTERS. IN OPERATION, THE

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PRESSURE DIFFERENTIAL SHALL NOT EXCEED 1.85 INCHES OF WATER.
 [RULE 1303(a)(1)-BACT]

5. MATERIALS USED IN THIS EQUIPMENT SHALL NOT CONTAIN ANY TOXIC/ CARCINOGENIC AIR CONTAMINANTS LISTED IN TABLE 1 IN RULE 1401, AS AMENDED MAY 2, 2003 OR EARLIER WITH THE EXCEPTION OF ETHYL BENZENE, MEK, XYLENE, ISOPROPYL ALCOHOL, TOLUENE, AND NICKEL OXIDE.
 [RULE 1401]

6. 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]

7. 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]

8. 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]

9. 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 MODIFICATION OF THE EQUIPMENT 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 MODIFICATION OF THE EQUIPMENT IS COMPLETE 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 EQUIPMENT NO_x AND CO EMISSIONS, REFERENCED AT 3 PERCENT VOLUME STACK GAS OXYGEN ON A DRY BASIS, AT THE MAXIMUM HEAT INPUT RANGE AT WHICH THE UNIT NORMALLY OPERATES.
 - E. IF THE COMBUSTION DEVICE MAY OPERATE WITH VARIABLE HEAT INPUT THAT FALLS BELOW 50% RATED HEAT INPUT CAPACITY DURING NORMAL OPERATION, ADDITIONAL TESTING FOR NO_x AND CO EMISSIONS SHALL BE MADE USING A HEAT INPUT OF LESS THAN 35% OF THE RATED HEAT INPUT CAPACITY.
 - F. NO_x 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.

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- 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 SUBMITTED TO THE DISTRICT WITHIN 45 DAYS AFTER THE TESTING DATE UNLESS OTHERWISE APPROVED IN WRITING BY THE DISTRICT.
- L. THE REPORT SHALL INCLUDE AT LEAST THE FOLLOWING (1) NOX CONCENTRATION AND EMISSION RATE, IN PPM AND POUND PER HOUR, (2) CO CONCENTRATION AND EMISSION RATE, IN PPM AND POUND PER HOUR, (3) OXYGEN CONTENT, (4) MOISTURE CONTENT, (5) FLOW RATE, (6) EXHAUST TEMPERATURE, AND (7) NATURAL GAS CONSUMPTION RATE IN CUBIC FEET PER MINUTE.

[RULE 1147, 1303(a)(1)-BACT]

Periodic Monitoring:

- 10. 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)]

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

[RULE 3004 (a)(4)]

Emissions And Requirements:

- 12. 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
- NOx: 30PPMV, RULE 1303(a)(1)-BACT

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PERMIT APPLICATION EVALUATION	Reviewed by	
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