PERMIT TO CONSTRUCT EVALUATION
Spray Booth, 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 547211:
Title V/RECLAIM Revision

Equipment	ID No.	Connected To	Source Type/ Monitoring Unit	Emissions	Conditions
Process 4: SURFACE COATING					
System 1: PRODUCTION SPRAY BOOTHS					
SPRAY COATING OPERATION, NO. G-80, 18 FT L X 15 FT W X 11.75 FT H, WITH 58-20 IN X 25 IN X 1 IN 1ST STAGE FILTERS, 8- 20 IN X 25 IN X 2 IN 2ND STAGE FILTERS, 42- 24 IN X 24 IN HEPA FILTERS AND ONE 10-HP EXHAUST FAN. ~~A/N: 527001~~ A/N 547212	D244			PM: (9) [RULE 404]; HAPS: (10)[40CFR 63 Subpart GG]; VOC: (9) [RULE 1124]; VOC: (9) [RULE 1171];	A63.5 , B27.10, ~~C1.15,~~ C1.16, C1.27, C4.1, C6.17, D182.2, D322.1, E71.4, E175.1, E175.4, E190.1, H23.11, K67.1, K67.2, K67.6

A63.5
The operator shall limit emissions from this equipment as follows:

CONTAMINANT	EMISSIONS LIMIT
VOC	LESS THAN OR EQUAL TO 15 LBS IN ANY ONE DAY

B27.10
The operator shall not use materials, EXCEPT FOR METHYL ETHYL KETONE (CAS# 78-93-3), XYLENE (CAS# 1330-20-7), TOLUENE (108-88-3), ETHYLENE GLYCOL MONOBUTYL ETHER (CAS# 11-76-2), ISOPROPANOL (CAS # 67-63-0), PROPYLENE GLYCOL MONOETHYL ETHER (CAS# 107-98-2), ETHYL BENZENE (CAS # 100-41-4), HEXAVALENT CHROMIUM (CAS # 18540-29-9), AND METHYLENE DIPHENYL DIISOCYANATE (CAS# 101-68-8) CONTAINING ANY TOXIC AIR CONTAMINANTS (TACS) IDENTIFIED IN THE SCAQMD RULE 1401, AS AMENDED 09/10/2010.

~~C1.15~~
~~The operator shall limit the coating and solvent usage to no more than 2.5 gallon(s) per day.~~

C1.16
The operator shall limit the material processed to no more than ~~0.35 0~~ 0.0367 lb(s) in any one year.
For the purpose of this condition, material processed shall be defined as the amount of hexavalent chromium emitted from this equipment.

To comply with this condition, the operator shall determine the amount of hexavalent chromium as follows: (the amount of coating used)x (density)x (percentage of chromate component)x (the ratio of hexavalent chromium molecular weight to the chromate component molecular weight) x (1- transfer efficiency) x (1- filter efficiency).
To comply with this condition ,the operator shall maintain records in a manner approved by the district to demonstrate compliance with this condition.

C1.27
The operator shall limit the material processed to no more than 544.32 lb(s) in any one year.
For the purpose of this condition, material processed shall be defined as the amount of ethyl benzene sprayed in this equipment.
To comply with this condition, the operator shall determine the amount of ethyl benzene as follows: (the amount of coating used) x (density) x (percentage of ethyl benzene)
To comply with this condition, the operator shall maintain records in a manner approved by the district to demonstrate compliance with this condition.

C4.1
The operator shall limit the exhaust flow to no less than 25,000 cubic feet per minute.

C6.17
The operator shall use this equipment in such a manner that the differential pressure being monitored, as indicated below, does not exceed 1.5 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 three stage filters.
The operator shall record the parameter being monitored once every 7 days.

D182.2
The operator shall test this equipment in accordance with the following specifications:
The operator shall verify the exhaust flow rate within 60 days of initial operation of the equipment. If the exhaust fan of this spray booth is repaired, modified, or replaced the operator shall conduct tests pursuant to an appropriate AQMD approved test method to determine the exhaust flow rate within 60 days of such repair, modification or replacement.

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.

E71.4
The operator shall not turn off the exhaust fan on this equipment until 30 seconds after spray operations have ceased.

E175.1
The operator shall not use this equipment unless all exhaust air passes through the following:
3-stage dry particulate filters

E175.4

The operator shall not use this equipment unless all exhaust air passes through the following:
a single stage of HEPA filters individually DOP tested (or equivalent) with 0.3 micron particulates and certified to have a control efficiency of not less than 99.97%, as required by AQMD Rule 1469.1

E190.1
The operator shall maintain a minimum stack height of 30 feet.

H23.11
This equipment is subject to the applicable requirements of the following rules or regulations:

CONTAMINANT	RULE	RULE/SUBPART
VOC	DISTRICT RULE	109
CHROMIUM, HEXAVALENT	DISTRICT RULE	1469.1
PM	DISTRICT RULE	481

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

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

HISTORY:
The company submitted Application Nos. 574211-2 as XPP on 2/07/13 for a change of condition for paint spray booth Device D244 and for RECLAIM/Title V Permit Revision. The facility will be using some new coatings in the spray booth and as a result they are requesting to update condition B27.10 to reflect the changes, and remove condition C1.15 which limits the amount of coatings used to 2.5 gallons per day.

This is a RECLAIM/Title V facility and the Title V renewal permit was issued to the facility on July 6, 2010. This project is the 6th permit revision since the issuance of the renewal permit. There are no records of complaints or Notices of Violation issued to the facility during the last two years. However, the facility was issued a Notice to Comply (NC) on 10/23/12 requiring the applicant to submit NOx emissions reports for process units, Rule 219 equipment, and large NOx sources as required by regulation XX, and submit the semi-annual compliance report on time. The applicant complied with the NC and is currently operating in compliance with the applicable rules and regulation.

PROCESS DESCRIPTION:
Rohr manufactures aerospace components for commercial and military aircraft. They perform metal and composite material processing, structural bonding and assembly operations. Manufacturing processes conducted at this location include composite bonding, resin curing, core stabilizing, primer and topcoat spray painting, roller coating, degreasing, solvent cleaning, metal surface preparation, abrasive blasting and tooling preparation.

The company is applying a high temperature primer and a metallized epoxy primer coating in the spray booth with a HVLP spray gun. The HVLP spray gun will be assumed to have a transfer efficiency of 65%. Particulates in the overspray are exhausted to a three stage filtration system. The stage with the highest collection efficiency will be the HEPA filters at 99.97%. The company expects to spray 3.5 gallons of coatings per day. All clean up will be done with acetone.

The coating and drying processes of this facility permit are limited by condition P2.1 which limits the VOC emissions to 1179 lbs VOC in any one day.

EMISSION CALCULATIONS:

Based on a usage of 3.5 gals/day.

Operating Hours = 24 hrs/days, 6 days/wk, 50 wks/yr

VOC:

The spray booth is currently limited by two conditions, condition A63.5 which limits the VOC emissions to 15 pounds per day and condition C1.15 which limits the amount of coating used to 2.5 gallons per day. The applicant is requesting to remove condition C1.15 and operate under the limits of condition A63.5. Since previous evaluation was based on the 15 lbs/day VOC limit, the removal of condition C1.15 will not cause an increase in VOC emissions from the spry booth. Further, all spray coating and drying operation at the facility are limited by process condition P2.1.

VOC R1 =R2 15 lbs/day / 24 hrs day = 0.63 lb/hr

Emissions for VOC will remain the same, hourly NSR and AEIS VOC emissions will be entered as calculated in the previous evaluation for this application.

PM:

Assume 65% transfer efficiency

99.97% control efficiency

PM= 2 x PM_{10}

PM, max = PM,avg

$$\text{PM, max} = 3.5\,\tfrac{\text{gal}}{\text{day}} \cdot 8.5\,\tfrac{lbcoating}{gal} \cdot 0.35\,\tfrac{\text{lb PM}}{\text{lb coating}}\,(\text{solids content epoxy}) = 10.41\,\tfrac{\text{lb PM}}{\text{day}}$$

$$R1_{PM,\,hr} = 10.41\,\tfrac{\text{lb PM}}{\text{day}} \cdot (1 - 0.65) \div 24 = 0.15\,\tfrac{\text{lb PM}}{\text{hr}}$$

$$R2_{PM,\,hr} = 0.15(1 - 0.9997) = 4.6x10^{-5}\,\tfrac{\text{lb PM}}{\text{hr}}\,(PM = 2PM10)$$

The emission changes will be as following:

	A/N:527001	A/N:547212	Changes
PM_{10}	0.0	0.0	None
ROG:	0.56 lb/hr	0.56 lb/hr	None

TOXIC EVALUATION:

According to the Material Safety Data Sheets (MSDS) submitted with this application, Rohr will be using some materials that contain carcinogenic and toxic air contaminants identified in Table 1 of Rule 1401, with an effective date of September 10, 2010 or earlier.

862-01545 BMS 10-103C, TY1, GRADE E

Mixing ratio:
COMP I, BMS 10-103C, TYI, Polyamide 2 parts
COMP II BMS 10-103C, TYI, Epoxy 1 part

Based on the mixing ratio for the primer, the VOC as applied per TDS is 2.84 lbs/gal, per 15 lbs/day VOC limit, the maximum usage would be: 15 lbs/day ÷2.84 lbs/gal = 5.28 gals/day
The facility requested maximum 3.5 gals/day.

The maximum usage for COMP I, would be 3.5 x2/3 = 2.33 gals/day

Quantity (Gal) 2.33
Density 13.7
Quantity (Lb) 31.9

Compound	Base		Activator/Thinner		Total (as applied, lb/day)	Total (as applied lb/hr)
	Content by wt%	Emissions	Content by wt%	Emissions		
Ethylene glycol monobutyl ether (2-butoxy ethanol)	5	1.6	None		2.41	0.07

862-02042 ALUMINIZED EPOXY PRIMER
Mixing ratio:
463-6-4, Aluminized Epoxy Primer 3 parts
X-306, Primer Curing Solution 1 part

Based on the mixing ratio for the primer, the VOC as applied per TDS is 5.70 lbs/gal, per 15 lbs/day VOC limit, the maximum usage would be: 15 lbs/day ÷5.7 lbs/gal = 2.63 gals/day

The maximum usage for X-306, would be 2.63 x1/4 = 0.66 gals/day

Quantity (Gal) 0.66
Density 6.67
Quantity (Lb) 4.38

Compound	Base		Activator/Thinner		Total (as applied, lb/day)	Total (as applied lb/hr)
	Content by wt%	Emissions	Content by wt%	Emissions		
Isopropanol			60	2.64	2.64	0.1

825-009 Heat & Fluid Resistant Coating
The mixing ratio for the coating, the VOC as applied per TDS is 5.41 lbs/gal, based on 15 lbs/day VOC limit, the maximum usage would be: 15 lbs/day ÷5.41 lbs/gal = 2.77 gals/day

Mixing ratio:
825-009 (Base) 4 parts
910-175 (Activator) 1 part

020-044 (Thinner) 4 parts

Based on maximum increase of 36 gals/yr:
825-009 usage would be: 36 gals X 4/9= 16 gals
Quantity (Gal) 16
Density (lb/gal) 10.47
Quantity (Lb) 167.5

167.5 lbs/yr ÷ (6 days/wk x 50 wks/yr) = 0.56 lbs/day

Compound	Base		Activator/Thinner		Total (as applied, lb/day)	Total (as applied, lb/yr)
	Content by wt%	Emissions (lb)	Content by wt%	Emissions		
Calcium Chromate	30	0.56	None		0.167	50.25

Uncontrolled emissions:
Cr^{+6}/yr=lb- $CaCrO_4$/hr x % hex chrome in $CaCrO_4$= 50.25 lbs/yr X 33.3% = 16.7lbs/yr

The Controlled emissions will be:
Cr^{+6}/hr=lb- $CaCrO_4$/hr x % hex chrome in $CaCrO_4$ x(1 - T.E.) x (1 – F. E.) ÷ 24 hrs/day
= 16.7 x 33.3% x (1-65%) x (1-0.9997)
= 0.241E-6 lb/hr = 5.8E-06lb/day = 0.00178lbs/yr

466-21-7038, Flat Black Epoxy HS Topcoat

Mixing ratio:
466-21-7038, Flat Black Epoxy HS Topcoat 3 parts
Aluminized Epoxy (Catalyst) 1 part

Based on maximum increase of 10 gals/yr usage, the 466-21 usage would be: 10 gals X 3/4 = 7.5 gals/yr

	Base	Activator
Quantity (Gal)	7.5	2.5
Density	11.8	7.5
Quantity (Lb)	88.5	18.7

Base: 88.5 lbs/yr ÷ (6 days/wk x 50 wks/yr) = 0.295 lbs/day
Activator: 18.7 lbs/yr ÷ (6 days/wk x 50 wks/yr) = 0.06 lbs/day

Compound	Base		Activator/Thinner		Total(as applied, lb/day)
	Content by wt%	Emissions	Content by wt	Emissions	
Ethyl benzene	1.5	0.0044	None		0.0044
Propylene glycol monobutyl ether	5	0.015	40	0.024	0.0385

Compound	lb/hr
Hexavalent Chrome	0.238E-6
Ethyl benzene	0.00018
Isopropanol	0.1

Propylene glycol monobutyl ether	0.0016

MICR Calculation Data:

Operating Hours	=	24 hrs/days, 6 days/wk, 50 wks/yr
Release Type	=	Point Source
Stack Height	=	30 feet (From Applicant)
Receptor Type	=	Off-site Worker
Receptor Distance	=	134 meters (Aerial Map, Worst Case)
Receptor Type	=	Residential (Aerial Map, Worst Case)
Receptor Distance	=	167 meters

Based on the attached Tier III Health Risk Assessment, using the maximum possible emissions from spraying, the result shows that this emission will not result in an Acute Hazard Index or cumulative cancer MICR increase exceeding one, and one in a million respectively, thus staying within the limits of Rule 1401. Therefore, the permit for the above equipment will be issued with updated increased annual limits for hexavalent chromium emissions, and ethyl benzene.

Based on previous risk analysis conducted in the original application (A/N 466660), the maximum allowable hexavalent chromium emissions was 4.04E-06 lb/hr (see attachment), using control efficiency of 99.97% for HEPA filters and transfer efficiency of 65% of HVLP guns. The total monthly hexavalent chromium emissions after change of condition will be:

Cr^{+6}/month (Controlled):

4.04E-06 lb/hr X 24 hrs/day x 30 days/month = 0.0029 lbs/month 0.035 lbs/yr
Cr^{+6}/month (Controlled):
Total Cr^{+6}/yr (Controlled) = 0.035 + 0.00178 = 0.0368 lbs/yr

Ethylbenzene:
Based on previous risk analysis conducted in the original application (A/N 466660), the maximum allowable ethyl benzene emission was 6.30E-02 lb/hr (see attachment). The monthly EB emissions after change of condition will be:

6.30E-02 lb/hr X 24 hrs/day x 30 days/month = 45.36 lbs
Total ethylbenzene/yr = 544.32 lb/yr

The condition of total Cr^{+6} from coatings containing hexavalent chromium will be updated accordingly; a new condition will be placed on the permit to limit the monthly emission usage of top coats containing ethyl benzene.

Propylene glycol monobutyl ether:
The maximum annual usage for propylene glycol monobutyl ether would be:

0.0385 lb/day x 6 days/wk x 50 wk/yr = 11.5 lbs/yr <<2.31 E+05 lbs/yr

The threshold for propylene glycol monobutyl ether is 2.31E10+05 lbs/yr at worst case scenario, the facility usage will be well below the threshold based on daily VOC limit, no usage limit will be imposed.

RULES/REGULATION EVALUATION:

Rule 212 (c)(1): This section requires a public notice for all new or modified permit units that emit air contaminants located within 1,000 feet from the outer boundary of a school.
No public notice is required since no school is located within 1,000 ft from the above site.

Rule 212 (c)(2): This section requires a public notice for all new or modified facilities that have on-site emission increases exceeding any of the daily maximums as specified by Rule 212(g).

The proposed project will not result in an emission increase for the entire facility that will exceed the daily maximums as specified under 212(g). Therefore, Public Notice is not required under this section of the rule.

Rule 212(c)(3): This section requires a public notice for all new or modified permit unit with increases in emissions of toxic air contaminants listed in Table I of Rule 1401 resulting in MICR greater than 1E-6 per permit unit or greater than 10E-6 per facility.

The proposed project will not result in an increase of toxic emissions that will cause a MICR of one in a million or greater or generate a hazard index in excess of one. Therefore, Public Notice is not required under this section of the rule.

Rule 212(g): This section requires a public notice for all new or modified sources that result in emission increases exceeding any of the daily maximums as specified by Rule 212(g).

There is no emission increase due to the proposed change of condition. The following summarizes emissions from this project:

	Maximum Daily Emissions					
	ROG	NO_x	PM_{10}	SO_2	CO	Pb
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

No public notice is required since no emission increase has occurred.

RULE 401, VISIBLE EMISSIONS
With the proper operation and maintenance of the equipment, no visible emissions are expected. Compliance with this rule is expected.

RULE 402, NUISANCE
With the proper operation and maintenance of the equipment, nuisance problems are not expected. Compliance with this rule is expected.

RULE 1124, AEROSPACE ASSEMBLY AND COMPONENT MANUFACTURING OPERATIONS
In the spray booth, the company will be spraying a metallized epoxy coating and a high temperature primer, which have coating VOC limits of 700 and 850 g VOC/L, respectively. The epoxy will have a coating VOC content of 683 g VOC/L, and the High Temperature primer will have a content of 644.3 g VOC/L. Both of these coatings will meet their respective VOC limits. The two new top coats

with VOC content of 416 g/l will meet the VOC limit of 420 g/l. The primer will have a coating VOC content of 340 g/l, which will meet the VOC limit of 350 g/l. They will be applied with a HVLP spray gun which will meet the transfer efficiency requirements of subsection (c)(3) of this rule. Compliance with this rule is expected.

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

high VOC-emitting facilities

Rohr is a high VOC-emitting facility 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 spray booth is limited to 15 lbs of VOC per day. The exhaust flow rate from the booth is 27,000 cfm. The exemption requires the booth exhaust flow rate to remain above 10,000 cfm.

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)

There is no VOC emissions increase due to this proposed change of permit conditions. There will be negligible PM emissions increase. BACT requirement for PM emission is the use of dry filters with a minimum of 90% control efficiency. The spray booth is equipped with filters that are greater than 90% efficient. Compliance.

RULE 1303(b)(1), MODELING

The proposed change of permit conditions will result in a minor increase in PM10 emission that will be well below the Appendix A screening level for non-combustion sources of 0.41 lbs PM10/hr. Compliance with the modeling requirements is expected.

RULE 1303(b)(2):

The proposed change of permit conditions will not result in any VOC emission increase. The increase in PM10 emission is less than 0.42 pound per day. Therefore, no emission offsets are required.

RULE 1401, NEW SOURCE REVIEW OF TOXIC AIR CONTAMINANTS

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.

The proposed change of conditions will result in increase in chromium, and propylene glycol monoethyl ether emissions. Based on the Tier III Risk assessment result, the MICR values were determined to be less than one in a million for residential and commercial. The Acute and Chronic values for all target organs did not exceed 1.0. The values are presented in the Risk Assessment in the appendix.

MICR	Residential	Commercial
Total	**9.97E-07**	**1.43E-08**

Permit condition B27.10 will be updated accordingly disallowing the use of materials that contain toxic air contaminants as identified in Rule 1401, as amended on September 10, 2010, or earlier, except for methyl ethyl ketone, xylene, toluene, ethylene glycol monobutyl ether, propylene glycol monoethyl ether, ethylbenzene, and methylene diphenyl diisocyanate, and hexavalent chromium. The chromium and ethylbenzene emissions of the coatings will also be limited by permit condition. Compliance with this rule is expected

RULE 1469.1, SPRAY OPERATIONS USING TOXIC CHEMICALS

The company is spraying coatings containing hexavalent chromium in the spray booth and is subject to the requirements of this rule. At an exhaust rate of 27,000 cfm and a booth cross section of 176.25 ft^2, the average inward face velocity will be 153.2 fpm, which will exceed the minimum requirement of 100 fpm of subsection (d)(1)(B). The company will be using an HVLP spray gun to apply chromium containing coatings which will meet the transfer efficiency requirements of (d)(2). This source is vented to a HEPA filter with an efficiency of 99.97% to meet the requirements of section (d)(3). Compliance with this rule is expected.

REGULATION XX-RECLAIM

Rohr, Inc. is a NOx RECLAIM facility. This project will not affect NOx emissions at the facility since the spray booth is not equipped with a combustion source. 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 coatings that qualify as specialty coatings under Appendix A of this subpart. Pursuant to 63.741(f), there are no control requirements for specialty coatings. The spray booth will have a HEPA filter due to the presence of chromium. The HEPA filter will have a control efficiency of 99.97% on particles 0.3μ and larger. The facility is expected to comply with this section.

REGULATION XXX:

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.

<u>Non-RECLAIM Pollutants or HAPs</u>

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
PM_{10}	30
SOx*	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 6th permit revision to the Title V renewal permit issued to this facility on July 6, 2010. The following table summarizes the cumulative emission increases resulting from all permit revisions since the Title V renewal permit was issued:

Revision	**HAP**	**VOC**	**NOx***	**PM10**	**SOx**	**CO**
Previous permit Revisions.	0	0	1*	0	0	1
6th. Permit Revision Change of condition of D244 to use new coatings.	0	0	0	0	0	0
Cumulative Total	0	0	1	0	0	1
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 NOx 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. The proposed change of permit condition will not result in an increase in NOx emissions. As a result, this proposed project is considered as a "minor permit revision" for RECLAIM pollutants.

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.