

<b>SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</b>  <b>ENGINEERING AND COMPLIANCE DIVISION</b> Large Coating, Printing, Aerospace and Chemical Operations Team <b>APPLICATION PROCESSING AND CALCULATIONS</b>	PAGE	1 of 12
	APP. NUMBER	Various
	PROCESSED BY	SMP
	REVIEWED BY	
	DATE	11/16/09

**PERMIT TO CONSTRUCT EVALUATION  
INSIDE SPRAY MACHINES, BAGHOUSE AND AFTERBURNER (RTO)**

<b>Applicant's Name</b>	REXAM, INC.
<b>Company I.D.</b>	052517
<b>Mailing Address</b>	20730 PRAIRIE ST., CHATSWORTH, CA 91311
<b>Equipment Address</b>	SAME AS ABOVE

**EQUIPMENT DESCRIPTION**

**Application No. 503400 (Modification of P/O D37076, A/N 215460) (Line No. 1) (D5)**

MODIFICATION OF THE EQUIPMENT SO THAT IT CAN BE VENTED TO APC C76 VIA C77.

INSIDE SPRAY STATION NO. 1, SIXTEEN ¾ H. P. MOTORS SERVING 8 AIRLESS SPRAY HEADS.

**Application No. 503401 (Modification of P/O D37075, A/N 215461) (Line No. 2) (D13)**

MODIFICATION OF THE EQUIPMENT SO THAT IT CAN BE VENTED TO APC C76 VIA C77.

INSIDE SPRAY STATION NO. 2, SIXTEEN ¾ H. P. MOTORS SERVING 8 AIRLESS SPRAY HEADS.

**Application No. 503403 (Modification of P/O F89336, A/N 460981) (Line No. 3) (D20)**

MODIFICATION OF THE EQUIPMENT SO THAT IT CAN BE VENTED TO APC C76 VIA C77.

INSIDE SPRAY STATION NO. 3, SIXTEEN ¾ H. P. MOTORS SERVING 8 AIRLESS SPRAY HEADS.  
[CURRENTLY VENTED TO A BAGHOUSE AND AFTERBURNER, DEVICE NOS. C55 AND C22)]

<b>SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</b>  <b>ENGINEERING AND COMPLIANCE DIVISION</b> Large Coating, Printing, Aerospace and Chemical Operations Team  <b>APPLICATION PROCESSING AND CALCULATIONS</b>	PAGE	2 of 12
	APP. NUMBER	Various
	PROCESSED BY	SMP
	REVIEWED BY	
	DATE	11/16/09

**Application No. 503181 (New Construction, Replace Baghouse P/O F89360 A/N 460986, C55) (C77)**

AIR POLLUTION CONTROL SYSTEM CONSISTING OF:

1. DUST COLLECTOR, DONDALSON TORRIT, MODEL NO. DFT 3-36, WITH 36 CARTRIDGE FILTERS, EACH 1' – 1.8" DIA. X 2' – 2" H., 9174 SQ. FT. TOTAL FILTER AREA, AND A PULSE JET SHAKER.
2. EXHAUST SYSTEM VENTING THREE INSIDE SPRAY SYSTEMS (D5, D13 AND D20) WITH A 30 H.P. MOTOR. [D77 WILL BE VENTED TO AFTERBURNER (RTO) C76]

**Application No. 503404 (Modification of P/C Issued 12/9/09, A/N 498291) (C76)**

AIR POLLUTION CONTROL SYSTEM CONSISTING OF:

1. AFTERBURNER, REGENERATIVE, HOT-ROCK BED TYPE, MEGTEC, MODEL NO. CLEANSWITCH CS500-95, 24' - 0" W. X 43' - 5" L. X 18' - 7" H., 50,000 SCFM, WITH A MAXIMUM RATING OF 9,700,000 BTU PER HOUR MAXON NATURAL GAS FIRED BURNER, MODEL NO. KINEDIZER LE, A 30 H.P. COMBUSTION BLOWER AND A NATURAL GAS INJECTION SYSTEM OF 10,185,000 BTU/HR.
2. HEAT EXCHANGE CHAMBER, 2-CHAMBERS, STRUCTURED CERAMIC MEDIA.
3. EXHAUST SYSTEM WITH A 400 H.P. EXHAUST BLOWER VENTING LINE 3 PRINTER OVEN (D19), LINE 3 INSIDE BAKE OVEN (D21), LINE 1 INSIDE BAKE OVEN (D6), LINE 2 INSIDE BAKE OVEN (D14), LINE 3 BASECOATER PIN OVEN (D48), LINE 1, 2 AND 3 INSIDE SPRAY SYSTEMS (D5, D13 AND D20) AND A BAGHOUSE (C77).

**Application No. 503405 (Administrative change, Previous P/O F59016, A/N 410004) (C72)**

AIR POLLUTION CONTROL SYSTEM CONSISTING OF:

1. SCRUBBER, AERPRO AIR CLEANING INC., MODEL NO. WETAER 3000, 3'-1" W X 4'- 2" L X 7'-9" H, 40 GPM WATER SUPPLY, WITH DUAL CHEVRON BUILT-IN MIST ELIMINATOR.
2. EXHAUST SYSTEM WITH A 5 H.P. EXHAUST FAN VENTING ONE CAN WASHER LINE #2.

**Application No. 503406 (Administrative change, Previous P/O 59002, A/N 410403) (C73)**

AIR POLLUTION CONTROL SYSTEM CONSISTING OF:

<b>SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</b>  <b>ENGINEERING AND COMPLIANCE DIVISION</b> Large Coating, Printing, Aerospace and Chemical Operations Team  <b>APPLICATION PROCESSING AND CALCULATIONS</b>	PAGE	3 of 12
	APP. NUMBER	Various
	PROCESSED BY	SMP
	REVIEWED BY	
	DATE	11/16/09

1. SCRUBBER, AERPRO AIR CLEANING INC., MODEL NO. WETAER 5000, 3'-11" W X 5'- 5" L X 7'-9" H, 40 GPM WATER SUPPLY, WITH DUAL CHEVRON BUILT-IN MIST ELIMINATOR.
2. EXHAUST SYSTEM WITH A 10 H. P. EXHAUST FAN VENTING ONE CAN WASHER LINE #1.

**Application No. 503193**

TITLE V/RECLAIM PERMIT REVISION APPLICATION.

<b>HISTORY</b>
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Rexam plc, Rexam Beverage Can Co. proposes to vent the inside spray stations for lines 1 and 2 to a dust collector with an exhaust system, which is the current operational configuration for the inside spray station on line 3, with the primary purpose to improve VOC collection efficiency for the two additional inside spray stations. This new dust collector will vent three inside spray stations for lines 1, 2 and 3 (devices D5, D13 and D20) to capture emissions and then vent the exhaust (primarily VOC) to the recently permitted RTO (C76). [P/C issued 12/9/09, A/N 498291]

Line 3 inside spray station is currently vented to an afterburner (device C22) via a baghouse (device C55), while the inside spray stations for lines 1 and 2 are vented directly to the atmosphere. The cans from these three inside spray stations on lines 1, 2 and 3 go immediately to three respective inside spray pin ovens on conveyors, where coating is dried and the rest of the VOCs are vented to existing afterburners (C22 and C23). A permit to construct (A/N 498291) was issued to Rexam to install a RTO (C76) on December 9, 2009, to replace two afterburners (C22 and C23).

Rexam has submitted three applications for modification of the inside spray stations on lines 1, 2 and 3, to vent them to a new, larger cartridge dust collector before venting the VOC laden air to a RTO (C76). In addition, one application was submitted to construct the dust collector and another application was submitted to modify the recently permitted RTO (C76) to vent two additional inside spray stations via the new, larger dust collector. Also, two administrative change applications for two existing scrubbers were submitted to remove the water recirculation permit condition.

A VOC emission cap has been established for this facility (1431 lbs/day). The applicant has not requested any VOC emission increases from the facility due to this project. All the coatings and printing inks to be used are in compliance with R1125 and 40CFR60.492. The applicant has already obtained facility-wide VOC HAP caps (10 tons/yr for single HAP and 25 tons/yr for combined HAPs Condition F2.2); exemption threshold from the NESHAP requirements under 40CFR63 Subpart KKKK.

<b>SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</b>  <b>ENGINEERING AND COMPLIANCE DIVISION</b> Large Coating, Printing, Aerospace and Chemical Operations Team  <b>APPLICATION PROCESSING AND CALCULATIONS</b>	PAGE	4 of 12
	APP. NUMBER	Various
	PROCESSED BY	SMP
	REVIEWED BY	
	DATE	11/16/09

The District database shows that the applicant has not received any odor nuisance or visible emission complaints from the public in last two years. The applicant received one notice of violation for not submitting NOx data, in the last two years. Also, two notices to comply were issued to this facility in the last two years to provide RECLAIM NOx emission data properly. The facility was operating in compliance upon the follow-up inspections.

Rexam Beverage Can Co. was previously operated under American National Can Company and it is a RECLAIM & Title V facility. A Title V renewal permit was issued to this facility on October 6, 2009. The proposed permit revision is considered as a “de minimis significant permit revision” to the renewed Title V permit, as described in Regulation XXX evaluation.

**PROCESS DESCRIPTION**

The company is in the business of manufacturing cans for the beverage companies, such as Coca-Cola, Pepsico, etc. Rules 1125 and 1171 apply to this facility. The following steps are involved in the can manufacturing process.

1. Small cups are formed on Cupper units from aluminum sheet metal.
2. Cups are transformed into can bodies in the Body-makers by extrusion method. The trimmer trims the excess material off the cans.
3. Cans are cleaned in the acid baths in washer unit to remove lubricants and oxide film layers.
4. Cans are washed in the weak acid bath followed by de-ionized water rinse in the washer lines.
5. Cans are dried in the dryers to remove the moisture.
6. Cans pass through roller-coaters to apply a high-solids water-based white basecoat on the outside of the cans. Basecoat is not required on all the cans.
7. Basecoat is cured in a pin-oven.
8. A decorative ink print and over-varnish is applied on the printer unit.
9. Bottom varnish is applied on the bottom varnish unit.
10. Printing inks and the varnish are cured in a pin-oven.
11. Inside of the cans are spray coated with a coating. A set of eight spray stations are located in a can manufacturing line. This coating is applied to provide a protective barrier between a product and the cans.
12. A bake oven cures the inside coating.
13. Can bodies are necked and flanged.
14. Inside coating is light-tested for 100% coverage.
15. Cans are palletized automatically for shipping ready.

The proposed project will not change how Rexam coats the inside of the beverage cans; only how and to where the spraying equipment is vented/controlled. The primary purpose is to improve VOC collection efficiency for the two additional inside spray stations.

<b>SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</b>  <b>ENGINEERING AND COMPLIANCE DIVISION</b> Large Coating, Printing, Aerospace and Chemical Operations Team  <b>APPLICATION PROCESSING AND CALCULATIONS</b>	PAGE	5 of 12
	APP. NUMBER	Various
	PROCESSED BY	SMP
	REVIEWED BY	
	DATE	11/16/09

The can production lines operate 24 hours a day and clean-up material usage is very minimal. Most of the coatings are water-based and water is used as equipment clean-up material.

The two administrative change applications for two existing scrubbers were submitted to remove the water recirculation permit condition. The scrubbing here is accomplished by vigorous mixing of the particulates with the water. The scrubber has four sections: air inlet, air and water mixing, entrained moisture elimination and air outlet. Both water and air form a heavy wave-like action in the scrubbing section for the mixing and the wetting of the air contaminants (particulates). The wave is forced against another baffle, which completes the particulate separation from the air stream. The wet particulates with heavier specific gravity sink to the bottom of the reservoir. The 100% moisture laden clean air is drawn upward to the mist eliminators, where visible water (moisture) particles are separated from the air stream. The clean air continues its path through the blower section. There is a valve on the unit which maintains the water level in the reservoir. There is no continuous recirculation of the water.

**OPERATING HOURS**

Average : 24 hour/day, 7 day/week, 52 weeks/year  
Maximum: 24 hour/day, 7 days/week, 52 weeks/year

**EMISSION CALCULATIONS**

Application Nos. 503181, 503400, 503401, 503403 and 503404

Modification of three inside spray stations, construction of a dust collector with an exhaust system and the modification of a RTO.

The applicant is modifying the inside spray stations of lines 1, 2 and 3. The inside spray stations will be vented to a dust collector to improve the VOC collection efficiency from this equipment, with the additional benefit of control of particulate emissions. All the VOC emissions will be assigned to the inside spray stations with the overall control efficiency of 80% (collection and destruction) as previously recorded in the AQMD database. The VOC emissions data for the spray stations 1 and 2 will be updated under line 3. There will be no VOC emission increases from the facility. The applicant has not requested any VOC emission increase under this project.

<b>SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</b>  <b>ENGINEERING AND COMPLIANCE DIVISION</b> Large Coating, Printing, Aerospace and Chemical Operations Team  <b>APPLICATION PROCESSING AND CALCULATIONS</b>	PAGE	6 of 12
	APP. NUMBER	Various
	PROCESSED BY	SMP
	REVIEWED BY	
	DATE	11/16/09

The dust collector is expected to provide 99% of particulate control efficiency. Thus, with better collection of VOC emissions and particulate emissions, there will be reduction in the overall VOC and PM10 emissions from the installation of the dust collector.

<b>DUST COLLECTOR EVALUATION</b>
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Filter Area Ft <sup>2</sup>	: 9174 Ft <sup>2</sup>
Filter Cleaning Method	: Pulse Jet
Dust Collector Efficiency	: 99%
Exhaust Air Flow Rate	: 9000 cfm
Given	: PM10 = 50% of PM (Assumed)

The previous permit application evaluations for the inside spray stations did not calculate nor record and enter any PM and PM10 emissions (considered negligible). Past and recent observations of this operation have demonstrated no visible emissions were released near the point of spray coating application. The spray is performed at close proximity to the opening of the open-on-one-end can body and the amount of coating applied per can is calculated and applied automatically and consistently. Taking into account transfer efficiency and fall-out, a conservative maximum airborne particulate emission rate of 0.5% is expected for this specific operation at this facility. Emissions from the point of application will have improved collection through the use of narrow ducting installed near the spray nozzles, which are directed to a cartridge dust collector and then to the RTO.

Transfer efficiency =  $(1 - 0.995) = 0.005$

Average coating usage per hour = 60 gallons from all three lines

Maximum coating usage per hour = 75 gallons from all three lines

Avg. Uncontrolled PM emissions =  $(60 \text{ gal/hr})(1.7 \text{ lbs/gal solids})(0.005) = 0.51 \text{ lbs/hr}$

Max. Uncontrolled PM emissions (R1) =  $(75 \text{ gal/hr})(1.7 \text{ lbs/gal solids})(0.005) = 0.64 \text{ lbs/hr}$

Avg. Controlled PM emissions =  $0.51 \text{ lbs/hr} \times 0.01 = 0.05 \text{ lbs/hr}$

Max. Controlled PM emissions (R2) =  $0.64 \text{ lbs/hr} \times 0.01 = 0.06 \text{ lbs/hr}$

Avg. Uncontrolled PM10 emissions =  $0.5 \times 0.5 = 0.26 \text{ lbs/hr}$

Max. Uncontrolled PM10 emission (R1) =  $0.6 \times 0.5 = 0.32 \text{ lbs/hr}$

Avg. Controlled PM10 emissions =  $0.26 \times 0.5 = 0.013 \text{ lbs/hr}$

Max. Controlled PM10 emissions (R2) =  $0.32 \times 0.5 = 0.016 \text{ lbs/hr}$

<b>SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</b>  <b>ENGINEERING AND COMPLIANCE DIVISION</b> Large Coating, Printing, Aerospace and Chemical Operations Team  <b>APPLICATION PROCESSING AND CALCULATIONS</b>	PAGE	7 of 12
	APP. NUMBER	Various
	PROCESSED BY	SMP
	REVIEWED BY	
	DATE	11/16/09

Exhaust Air Particulate Emission Concentration =  $R2 / \text{Blower CFM} \times 7,000 \text{ grain/lb} / 60 \text{ min/hr}$   
=  $0.06/9000 \text{ CFM} \times 7000/60 = 0.0008 \text{ grains/cfm}$

Air-to-cloth ratio =  $\text{Blower CFM} / \text{Filter Area} = 9000/9174 = 0.98 : 1$

**Application Nos. 503405 and 503406**

These are administrative change applications only and the proposed change in operating condition will not have any impacts on emissions. Therefore, the permit conditions referring to the water recirculation will be deleted. Previous permit application emission data will be re-entered for these applications.

**RULES/REGULATION EVALUATION**

▫ *RULE 212, PUBLIC NOTIFICATION*

▼ *SECTION 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. This source is not located within 1,000 feet from the outer boundary of a school. Therefore, public notice will not be required by this section.

▼ *SECTION 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 maximums as specified in subdivision (g). This is replacement equipment with reduction in emissions. Thus, as shown in the following table, the emission increases from this facility are below the daily maximum limits specified by Rule 212(g). Therefore, these applications will not be subject to this section.

<b>LB/DAY</b>	<b>CO</b>	<b>NOX</b>	<b>PM<sub>10</sub></b>	<b>ROG</b>	<b>SOX</b>	<b>Pb</b>
<b>MAX. LIMIT</b>	220	40	30	30	60	3
<b>INCREASES</b>	0	0	0	0	0	0

▼ *SECTION 212(c)(3):*

There is no toxic emission increase from the use of coatings in this equipment, since the VOC cap will remain the same. Therefore, these applications will not be subject to this section.

<b>SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</b>  <b>ENGINEERING AND COMPLIANCE DIVISION</b> Large Coating, Printing, Aerospace and Chemical Operations Team  <b>APPLICATION PROCESSING AND CALCULATIONS</b>	PAGE	8 of 12
	APP. NUMBER	Various
	PROCESSED BY	SMP
	REVIEWED BY	
	DATE	11/16/09

v **SECTION 212(g):**

This section requires a public notice for all new or modified sources which undergo construction or modifications resulting in an emissions increase exceeding any of the daily maximum specified in the table below. As shown in the following table, the emission increases from this project are below the daily maximum limits specified by Rule 212(g). Therefore, public notice will not be required by this section.

LB/DAY	CO	NOX	PM <sub>10</sub>	ROG	SOX	Pb
<b>MAX. LIMIT</b>	220	40	30	30	60	3
<b>INCREASES</b>	0	0	0	0	0	0

▫ **RULES 401 & 402, VISIBLE EMISSIONS & NUISANCE**

AQMD database has no records of any visible emissions or nuisance violations against this company in the last two years.

▫ **RULES 404 & 405, PARTICULATE MATTER CONCENTRATION & WEIGHT**

Compliance with these provisions is expected with 0.0008 grains/scf particulate concentration.

▫ **RULE 1125( c)1), METAL CONTAINER, CLOSURE, AND COIL COATING OPERATIONS**

The applicant is in compliance with these requirements by using inks and coatings with the following VOC content less water and exempt compounds. (Information obtained from the previous evaluation.)

Coating Type	Material Used	Rule VOC Limit (gram/liter)	VOC as applied (gram/liter)	Compliance
Base coat	PPG/CE3780-1	2.1	1.8	Yes
Overvarnish	PPG/CC3625XLV	2.1	2.1	Yes
Bottom Varnish	PPG/3655	2.1	2.1	Yes
Interior Spray	Valspar 4020	3.7	2.49	Yes
Inks	INX Inks	2.5	2.5	Yes

▫ **RULE 1125( c)4), METAL CONTAINER, CLOSURE, AND COIL COATING OPERATIONS**

The applicant has an approved transfer efficiency equivalency plan on file to comply with these requirements.

▫ **REGULATION IX, NSPS, SUBPART WW, METAL CONTAINER, CLOSURE, AND COIL COATING OPERATIONS**

The applicant will be in compliance with these requirements by using coatings with the following VOC content. (Information obtained from the previous evaluation.)

<b>SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</b>  <b>ENGINEERING AND COMPLIANCE DIVISION</b> Large Coating, Printing, Aerospace and Chemical Operations Team  <b>APPLICATION PROCESSING AND CALCULATIONS</b>	PAGE	9 of 12
	APP. NUMBER	Various
	PROCESSED BY	SMP
	REVIEWED BY	
	DATE	11/16/09

Coating Type	Material Used	Rule VOC Limit (kg/l solids)	VOC as applied (kg/l solids)	Compliance
Base coat	PPG/CE3780-1	0.29	0.28	Yes
Overvarnish	PPG/CC3625XLV	0.46	0.35	Yes
Bottom Varnish	PPG/3655	0.46	0.34	Yes
Interior Spray	Valspar 4020	0.89	0.75	Yes

▫ **RULE 1171, SOLVENT CLEANING OPERATIONS**

Clean-up materials to be used on the coater, spray stations and printer comply with the Rule requirements. (Information obtained from the previous evaluation.)

Material Used	Method Of Cleaning	Rule VOC (gm/liter)	VOC as Applied (gm/liter)	Compliance
By pas 1500	Hand-wipe	25	0	Yes

**REGULATION XIII**

☉ **RULE 1303(a), BEST AVAILABLE CONTROL TECHNOLOGY (BACT)**

(a) VOC EMISSIONS

The proposed regenerative thermal oxidizer with a 9.7 mm BTU/HR burner will be used to replace an existing direct-flame afterburner with 4.0 mm BTU/HR burner and a RTO with 3.5 mm BTU/HR burner. The regenerative thermal oxidizer is expected to achieve a minimum destruction efficiency of 95%. In addition, the regenerative thermal oxidizer is expected to result in a net decrease in all criteria pollutant emissions. Therefore, compliance with BACT requirements is expected. Also, a permit to construct has already been issued to this RTO unit, so there are no emission increases from this project.

(b) VOC AND PM10 EMISSIONS FROM COATINGS

Under this proposal all the VOC and PM10 laden air will be collected very close to the inside spray coating application points of all three lines. This will improve collection efficiency of VOC and PM10 emissions and thus there will be reduction in these emissions. Therefore, compliance with BACT requirements is expected.

(c) NOx EMISSIONS

The RTO burner will be used for start-up operation only to get the bed up to 1600 degrees F. Thus, NOx emissions are expected to be <0.5 lb/day with the usage of the burner for <120 minutes/day. A permit condition to automatically monitor and record the burner usage time will show compliance with this time limit.

<b>SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</b>  <b>ENGINEERING AND COMPLIANCE DIVISION</b> Large Coating, Printing, Aerospace and Chemical Operations Team  <b>APPLICATION PROCESSING AND CALCULATIONS</b>	PAGE	10 of 12
	APP. NUMBER	Various
	PROCESSED BY	SMP
	REVIEWED BY	
	DATE	11/16/09

The RTO burner will be used for start-up operation only to get the bed up to 1600<sup>0</sup> F. Thus, NOx emissions are expected to be <1 lb/day with the usage of the burner for <504 minutes/day. A permit condition to automatically monitor and record the burner usage time will show compliance with this time limit.

□ **RULE 1303(b)(1), MODELING**

The Tier III modeling of the NOx emissions from the afterburner unit for the worst case receptor indicated 7.05 µg/m<sup>3</sup> concentration for 1 hour (<20 µg/m<sup>3</sup>) and 0.564 µg/m<sup>3</sup> concentration annually (<1 µg/m<sup>3</sup>). Thus, afterburner unit complies with the modeling requirements.

**RULE 1303(b)(1), MODELING**

Modeling is not required, since PM10, NOx and CO emissions from the RTO are below the Table A-1 allowable emissions.

NOx (lbs/hr)		PM10 (lbs/hr)		CO (lbs/hr)	
Allowed	Actual	Allowed	Actual	Allowed	Actual
0.31	0.119	1.9	0.017	17.1	0.36

Modeling is not required, since PM10, NOx and CO emissions from the dust collector are below the Table A-1 allowable emissions.

NOx (lbs/hr)		PM10 (lbs/hr)		CO (lbs/hr)	
Allowed	Actual	Allowed	Actual	Allowed	Actual
0.068	0	0.41	0.25	3.7	0

□ **RULE 1303 (b)(2), EMISSION OFFSETS**

Rexham plc holds sufficient RTCs to offset the NOx emission increase from the RTO. All other criteria pollutants are <0.5 lb/day from the RTO. There will not be any VOC or PM10 emission increases from the dust collector. Thus, no VOC or PM10 emission offsets are required for this project.

**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.

<b>SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</b>  <b>ENGINEERING AND COMPLIANCE DIVISION</b> Large Coating, Printing, Aerospace and Chemical Operations Team  <b>APPLICATION PROCESSING AND CALCULATIONS</b>	PAGE	11 of 12
	APP. NUMBER	Various
	PROCESSED BY	SMP
	REVIEWED BY	
	DATE	11/16/09

Non-RECLAIM Pollutants or HAPs

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:

<b><u>Air Contaminant</u></b>	<b><u>Daily Maximum (lbs/day)</u></b>
HAP	30
VOC	30
NO <sub>x</sub> *	40
PM <sub>10</sub>	30
SO <sub>x</sub> *	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 initial Title V permit shall be accumulated and compared to the above threshold levels. This proposed project is the 1<sup>st</sup> permit revision to the renewed Title V permit issued to this facility on October 6, 2009. The following table summarizes the cumulative emission increases resulting from all permit revisions since the initial Title V 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>
1 <sup>st</sup> Permit Revision. Add device C76 (P/C, New construction) and permit condition change of D6, D14, D19, D20, D21, D48, D18, D70, C71, C55 (P/Cs) D43 and D44 (P/Os).	0	0	9	0	0	0
2 <sup>nd</sup> Permit Revision. Add device C77 (P/C, New construction) and permit condition change of D5, D13, D20, and C76 P/Cs) and scrubbers C73 and C72 (P/Os).	0	0	9	0	0	0
Maximum Daily	30	30	40	30	60	220

\* RECLAIM pollutant, not subject to emission accumulation requirements

<b>SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</b>	PAGE	12 of 12
<b>ENGINEERING AND COMPLIANCE DIVISION</b>	APP. NUMBER	Various
Large Coating, Printing, Aerospace and Chemical Operations Team	PROCESSED BY	SMP
<b>APPLICATION PROCESSING AND CALCULATIONS</b>	REVIEWED BY	
	DATE	11/16/09

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. Section B of the Title V permit shows that this facility’s NOx starting Allocation plus the non-tradable Allocation is 28,756 pounds. The proposed project is expected to result in an increase of 9 lbs/day (3285 lbs/year) of NOx emissions from this permit revision, less than the starting Allocation plus the non-tradable Allocations of 28756 pounds. 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.