

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

ENGINEERING DIVISION

APPLICATION PROCESSING AND CALCULATIONS

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APPL. NO. 554796	DATE 10/2/13
PRCSD BY REL	CHCKD BY

APPLICANT'S NAME: NORTHROP GRUMMAN SYSTEMS CORP.

FACILITY PERMIT ID# 800409

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EQUIPMENT ADDRESS: ONE SPACE PARK, Bldg. M1
REDONDO BEACH, CA 90278

PERMIT TO CONSTRUCT

Title V Permit Revision

Application No. 554797

Equipment Description:

PROCESS 7: EXTERNAL COMBUSTION					
System 1: Boilers					
Equipment	Device ID	Connect ed To	Source Type/ Monitoring Unit	Emissions	Equipment Specific Conditions
BOILER, NATURAL GAS, CLEAVER BROOKS, MODEL FLX-700-700-160HW, 7.0 MM BTU/HR, WITH FLUE GAS RECIRCULATION Reference A/N 554796 BURNER, NATURAL GAS, CLEAVER BROOKS, LOW NOX, MODEL NTH070-NGX-9S-4P, 7.0 MMBTU/HR	D359		NOX: PROCESS UNIT	CO: 2000 PPMV (5A)[RULE 407, 4-2-1982]; 100 PPMV (4)[RULE 1303(a)(1)-BACT, 12-06-02; CO: 400 PPMV (5)[Rule 1146, 9-5-2008], NOX: 9 PPMV (3)[RULE 2012, 5-6-2005] NOX: 9 PPMV (4)[RULE 2005, 6-3-2011; PM: 0.1 GRAINS/SCF (5)[RULE 409, 8-7-1981]	D28.3, D182.3, D332.1, L341.3

RECOMMENDATION

A Permit to Construct is recommended for application numbers 554796 subject to the following conditions:

D28.3 THE OPERATOR SHALL CONDUCT SOURCE TEST(S) IN ACCORDANCE WITH THE FOLLOWING SPECIFICATIONS:

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The test shall be conducted within the first 12 months after the issuance of this permit and once every 5-year period with the first 5-year period ending 11-20-2018.

The test shall be conducted to demonstrate compliance with the source testing requirements of Rule 2012 for a Process Unit opting to comply with a NOx concentration limit.

D182.3 THE OPERATOR SHALL TEST THIS EQUIPMENT IN ACCORDANCE WITH THE FOLLOWING SPECIFICATIONS:

Source testing shall be conducted within 180 days after the initial start-up unless otherwise approved in writing by the Executive Officer.

The source tests shall be performed to verify compliance with the NOx and CO emission limits specified by this permit.

The tests shall be conducted while the burner is firing at maximum, minimum, and average firing rates.

A source test protocol shall be submitted to the District within 60 days after the initial start-up with the ST-1 and ST-2 completed by the testing laboratory.

Written notice of the source tests shall be submitted to the District (addressed to South Coast Air Quality Management District, P.O. Box 4941, Diamond Bar, CA 91765) at least 14 days prior to testing so that an observer can be present.

Two complete copies of the source test reports shall be submitted to the District (South Coast Air Quality Management District, P.O. Box 4941, Diamond Bar, CA 91765) within 45 days after the test. The report shall include, but may not be limited to emission rates in pounds per hour and concentrations in ppmv at the outlet of the boiler, measured on a dry basis at 3% oxygen. The following operating data shall also be included for each firing rate:

- _ A. The exhaust flow rates, in actual cubic feet per minute (ACFM). _
- _ B. The firing rates, in BTU per hour. _
- _ C. The exhaust temperature, in degrees F. _
- _ D. The oxygen content of the exhaust gas, in percent. _
- _ E. The fuel flow rate. _

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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 (non conflict of interest) shall conduct the test.

Sampling facilities shall comply with the District Guidelines for Construction of Sampling and Testing Facilities, pursuant to Rule 217._

D332.1 The operator shall determine compliance with the CO emission(s) limit by conducting a source test at least every five years using a portable analyzer and AQMD-approved test method or, if not available, a non-AQMD approved test method. The test shall be conducted when the equipment is operating under normal conditions to demonstrate compliance with the CO concentration limit(s). The operator shall comply with all general testing, reporting, and recordkeeping requirements in Section E and K of this permit.

L341.3 Within 7 days after the start-up of this equipment, the following device(s) shall be removed from operation:

D91

Background:

Northrop Grumman Space & Mission Systems is engaged in the development and manufacture of advanced semiconductors and printed circuit boards including fabrication and assembly of electronic components and hardware for integration into satellite and space vehicle. The Company also conducts research and development relating to chemical lasers, rocket engine thrusters and energy related programs for commercial and non-commercial applications. The operations are currently performed at three major sites within the South Coast Air Basin and they are: Capistrano Test Site (CTS), Redondo Beach and Manhattan Beach.

This application was received by the District on 8/02/13 as a new construction of a 7.0 mmbtu/hr low-NOx boiler to be located at the Redondo Beach Title V facility under ID# 800409. The new 7.0 mm btu/hr boiler is a Cleaver Brooks, model FLX 700, water tube type boiler. The low-Nox burner is fully modulated with flue gas recirculation. It is expected to comply with the BACT requirements of 9 ppmv NOx and 100 ppmv CO.

This new boiler will replace the existing 6.5 mmbtu/hr boiler D91. The boiler will be used to heat and adjust the humidity of the air in the building M1 for

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the purpose of providing comfort to personnel working in the building and also for controlling the temperature & humidity of clean rooms. The boiler is expected to operate 24 hours per day, 7 days per week and 52 weeks per year.

The increased rating of the new boiler will result in an increase in PM10 emissions but even with this increased PM10, the facility will remain under the four tons of PM10 emission per year. In the future, any PM10 emission increases will require PM10 emission offsets.

Compliance History:

There are no records of nuisance complaints recorded against the facility in last two years. A Notice to Comply (E11077) was issued in October 2011 to the company to correct the horsepower rating of an existing 96 BHP engine operating under PERP. The facility corrected the rating the same month the notice was issued and is currently operating in compliance with the permit conditions and applicable rules.

Emissions Calculations:

New Boiler

@ 100 ppmv CO = 77.385 lb CO/mmcf

@ 9ppmv NOx = 11.66 lb NOx/mmcf

Rating = 7.0 mmbtu/hr

Operating schedule: 24 hrs/day, 7 days/week 50 weeks/year.

7.0mmbtu/hr = 0.00667 mmcf/hr

	Emission Factor lbs/mmcf	Hourly Emissions lbs/hr	Daily Emissions lbs/day	Annual Emissions lbs/yr	30 day average lbs/day
ROG	7.0	0.046	1.12	407.7	1.12
NOX	11.66	0.078	1.87	679.08	1.87
SOX	0.83	0.006	0.13	48.34	0.13
CO	77.39	0.516	12.38	4,507.19	12.38
PM10	7.5	0.05	1.20	436.8	1.20

GHG

CO2 7.0 mmbtu/hr(116.89lbs/mmbtu) = 818.23 lbs CO2/hr, 19,638 lbs CO2/day

CH4 7.0 mmbtu/hr(0.002lbs/mmbtu) = 0.014 lbs CH4/hr, 0.34 lbs CH4/day

Previous Boiler (D91)

@ 172 ppmv CO = 133.10 lb CO/mmcf

@ 28.3ppmv NOx = 36.66 lb NOx/mmcf

Rating = 6.5 mmbtu/hr

Operating schedule: 24 hrs/day, 7 days/week 50 weeks/year.

6.5mmbtu/hr = 0.00619 mmcf/hr

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	Emission Factor lbs/mmcf	Hourly Emissions lbs/hr	Daily Emissions lbs/day	Annual Emissions lbs/yr	30 day average lbs/day
ROG	7.0	0.043	1.04	378.56	1.04
NOX	36.66	0.227	5.45	1982.6	5.45
SOX	0.83	0.005	0.12	44.89	0.12
CO	133.10	0.824	19.77	7,198.04	19.77
PM10	7.5	0.046	1.11	405.6	1.11

GHG

CO2 6.5 mmbtu/hr(116.89lbs/mmbtu) = 759.79 lbs CO2/hr, 18,235 lbs CO2/day

CH4 6.5 mmbtu/hr(0.002lbs/mmbtu) = 0.13 lbs CH4/hr, 0.31 lbs CH4/day

Contaminant	D91 Previous Daily Emissions (lbs/day)	New Daily Emissions (lbs/day)	Delta emissions (lbs/day)
ROG	1.04	1.12	+0.081
NOX	5.45	1.87	-3.58
SOX	0.12	0.13	+0.01
CO	19.77	12.38	-7.39
PM10	1.11	1.20	+0.08
GHG Contaminant			
CO2	18,235	19,638	+1,403
CH4	0.31	0.34	+0.03

The overall outcome with the replacement of the 6.5 mm btu/hr device D91 with a larger 7.0 mm btu/hr Cleaver Brooks boiler will represent reductions in the NOx & CO but a slight increase in ROG, SOx & PM emissions. The increase will not trigger offsets since it is below 0.42 lbs/day.

Risk Assessment:Rule 1401

The boiler replacing D91 will have a 0.5 mmbtu/hr rating increase An increase in toxic emissions is expected. After completing the Risk Screening Assessment, the increased toxic emissions passed the tier 1 screening with the following results:

Tier 1

Cancer/Chronic	Acute
5.49E-02	2.30E-03
Pass	Pass

MICR:

Residential	Commercial
1.09E-09	7.57E-10

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Pass

Pass

The Hazard Index remained less than 1.0 for targeted organs. Compliance with Rule 1401 is expected.

Evaluation & Rule Review

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 maximum specified in Rule 212(g). A public notice is not required.

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 result in an emission increase of toxic emissions associated with the combustion of natural gas. As discussed in additional detail in the evaluation, the replacement of this equipment will not cause an MICR in excess of one in a million. 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).

The emission increase that will occur by the replacement of the existing boiler, D91 by the new boiler is shown below;

	Maximum Daily Emissions					
	<u>ROG</u>	<u>NO_x</u>	<u>PM₁₀</u>	<u>SO₂</u>	<u>CO</u>	<u>Pb</u>
Emission increase	0.08	-3.58	0.08	0.01	-7.39	0
MAX Limit (lb/day)	30	40	30	60	220	3

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	Maximum Daily Emissions					
	<u>ROG</u>	<u>NO_x</u>	<u>PM₁₀</u>	<u>SO₂</u>	<u>CO</u>	<u>Pb</u>
Compliance Status	Yes	Yes	Yes	Yes	Yes	Yes

No public notice is required since the emission increase is below the thresholds.

Rule 401: With proper operation and maintenance compliance with this rule is expected.

Rule 402: With proper operation and maintenance compliance with this rule is expected.

Rule 407: With proper operation and maintenance compliance with the 2000 PPMV CO limit is expected.

Rule 409: Estimated PM emissions 0.05 lbs PM/hr with a flue gas of 71,190 scfh.

$$= (0.05 \text{ lbs/hr} \times 7000 \text{ gr/lb}) / (71,190 \text{ scf/hr})$$

$$= 0.0049 \text{ gr/scf}$$

With proper operation and maintenance compliance with the 0.1 gr/scf PM limit is expected.

Rule 1146 This facility is a NOX RECLAIM facility and is subject to the NOX emission requirements of Reg 20. This boiler is still subject to the CO limits set forth by this rule and will comply with a CO emission guarantee of less than 100 ppmv for watertube type boilers. Compliance with this rule is expected.

REGULATION XIII: Though Northrop Grumman is a NOx RECLAIM facility, compliance with Reg. XIII is expected since the proposed project will only result in a negligible increase in VOC and PM10 emissions.

RULE 1303(a)(1): BACT for CO from watertube boiler is defined as the use of a low-NOx burner emitting no more than 100 ppmv CO. The boiler will be operated with an ultra low-NOx natural-gas fired burner. The burner is designed to operate at 9 ppm of NOx or less and 100 ppm of CO or less. Source test condition will be imposed on the permit requiring the applicant to demonstrate compliance with the NOx & CO limit.

RULE 1303(b)(1): Modeling for CO or PM is not required since the hourly emissions are less than the allowable limits.

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Modeling Analysis	NO_x (lb/hr)	CO (lb/hr)	PM10 (lb/hr)
Hourly Emissions	0.078	0.516	0.05
Allowable Limit	0.47	25.9	2.8

RULE 1303(b)(2): The proposed project will result in the following emission increase.

	<u>ROG</u>	<u>NO_x</u>	<u>PM₁₀</u>	<u>SO₂</u>	<u>CO</u>	<u>Pb</u>
Emission increase	0.08	-3.58	0.08	0.01	-7.39	0

The increases in ROG, PM and Sox are negligible and are not subject to offsets. NO_x/CO will show a reduction in emissions by this replacement. No offsets will be necessary. Compliance with this rule is expected.

RULE 1303(b)(4): The facility is expected to be in full compliance with all applicable rules and regulations of the District.

RULES 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 Northrop Grumman 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 proposed replacement of boiler D91 with the new boiler 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 proposed project does not exceed 15 ton/yr of PM10 or 40 ton/yr of NO_x.

40CFR60 Subpart Dc: Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units:

The requirements of this subpart are not applicable to the proposed unit since it is rated at less than 10 mmbtu/hr.

40CFR63 Subpart JJJJJ: National Emission Standards for Hazardous Air Pollutants: Industrial, Commercial, and Institutional Boilers and Area Sources:

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Boiler fired exclusively on natural gas are exempt from the requirements of this subpart per 63.1195(e)

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.

Risk Screening Assessment, the delta increase in toxic emissions passed the tier 1 screening with the following results:

Tier 1

Cancer/Chronic	Acute
5.49E-02	2.30E-03
Pass	Pass

MICR:

Residential	Commercial
1.09E-09	7.57E-10
Pass	Pass

The Hazard Index remained less than 1.0 for targeted organs. Compliance with Rule 1401 is expected.

REG XX Northrop Grumman is a NOx cycle 2 RECLAIM facility. The proposed boiler will be classified as a NOx process unit. The water tube boiler is equipped with a low nox burner. They will comply with the BACT requirements of 9 ppmv NOx and CO concentrations of 100 ppmv.

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RULE 2005: Northrop Grumman is a NO_x RECLAIM facility. The proposed project will result in a decrease in NO_x emissions. Compliance with Rule 2005 is expected.

RULE 2005(c)(1)(A): The boiler will be operated with an ultra low-NO_x natural-gas fired burner. The burner is designed to operate at 9 ppm of NO_x or less and 100 ppm of CO or less. The boiler is expected to operate in compliance with BACT through the use of the ultra low-NO_x burner. BACT for this boiler is defined as use of a low-NO_x burner emitting no more than 9 ppm.

RULE 2005(c)(1)(B): Modeling is not required since the estimated hourly NO_x emissions of 0.078 lb/hr does not exceed the allowable limit of 0.47 lb/hr. The proposed project will not result in a significant increase in the air quality concentration for NO₂.

RULE 2005(c)(2): This boiler is to replace an existing 6.5 mm btu/hr boiler under D91 and since the NO_x emissions have been reduced, the replacement will result in a NO_x reduction. No additional offsets will be required.

RULE 2005(g)(1): Statewide compliance certification is not required since the proposed project will not result in an increase of 1 pound or more of NO_x emissions and therefore does not qualify as a major modification at major polluting facility.

RULES 2005(g)(2) & 2005(g)(3): 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 Northrop Grumman 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 2005(g)(4): A modeling analysis for plume visibility is not required since the net emission increase from the proposed project does not exceed 40 ton/yr of NO_x.

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

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hazardous air pollutants (HAPs), and a “minor permit revision” for RECLAIM pollutants to the RECLAIM/Title V permit for this facility.

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:

Air Contaminant	Daily Maximum (lbs/day)
HAP	30
VOC	30
NO _x *	40
PM10	30
SO _x *	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 5th permit revision to the Title V renewal permit issued to this facility on June 8, 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	NO_x*	PM10	SO_x	CO
Previous Permit Revision Total Cumulative to date. Title V permit renewed June 8, 2010	0	2	0	1	0	12
5 th Permit Revision						
Replace 6.5mmbtu/hr boiler D91 with a new 7.0 mmbtu/hr boiler DXXX	0	0	0	0	0	0
Installation of 4 emergency ICE’s	0	0	4	0	0	0

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Revision	HAP	VOC	NO_x*	PM10	SO_x	CO
Replacement of 3 existing ICEs	0	0	0	0	0	0
Cumulative Total	0	2	4	1	0	12
Maximum Daily	30	30	40*	30	60	220

* RECLAIM pollutant, not subject to emission accumulation requirements

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 NO_x 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 replacement of the boiler will result in a decrease in NO_x emissions due to the low-NO_x burner. 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 and a “minor permit revision”, for RECLAIM pollutant, 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.

Conclusion:

The Boiler will operate in compliance with all District Rule and Regulations. A Permit to Construct is recommended for application number 554796 subject to preceding conditions.