

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING AND COMPLIANCE DIVISION <i>Large Coating, Printing and Chemical Operations Team</i> APPLICATION PROCESSING AND CALCULATIONS	PAGE	1 of 12
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**P/O no P/C EVALUATION
MODIFICATION TO CHEMICAL PROCESS LINES & SCRUBBER**

Applicant's Name	HONEYWELL INTERNATIONAL, INC.
Company I.D.	800003
Mailing Address	2525 W. 190 TH ST., TORRANCE, CA 90504
Equipment Address	2525 W. 190 TH ST., TORRANCE, CA 90504

EQUIPMENT DESCRIPTION

Application No. 497475

RECLAIM/TITLE V REVISION - DEMINIMIS SIGNIFICANT/MINOR

Application No. 497480 (Modification, Previous P/O D86396, A/N 297544)

MODIFICATION OF THE EQUIPMENT UNDER P/O D86396 (A/N 297544) BY CORRECTING THE HEIGHT AND LENGTH OF TANKS TO THE FOLLOWING EQUIPMENT DESCRIPTION:

REPAIR AND OVERHAUL LINE CONSISTING OF:

1. TANK # TK-44 (D171), PROCESS TANK, STRIPPING, 4 FT W. X 4 FT H. X 4 FT 4 IN L., SODIUM HYDROXIDE, SODIUM CARBONATE, SODIUM HYDROXY-ETHYLENE-DIAMINE TRIACETATE, HEATED, SPARGED.
2. TANK # TK-47 (D172), PROCESS TANK, 4 FT W. X 4 FT H. X 4 FT 4 IN L., MINERAL OIL, ETHANOL AMINE, HEATED.
3. ASSOCIATED RINSE TANKS.

Application No. 497484 (Modification, Previous P/O D86398, A/N 297546)

MODIFICATION OF THE EQUIPMENT UNDER P/O D86398 (A/N 297546) BY CORRECTING THE HEIGHT AND LENGTH OF TANKS WITH THE FOLLOWING EQUIPMENT DESCRIPTION:

CHEMICAL PROCESS CLEANING LINE "C37" CONSISTING OF:

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1. TANK # TK-20 (D165), 4 FT W. X 4 FT H. X 4 FT 4 IN L., (ISOPREP 44L) SODIUM METASILICATE, and SODIUM CARBONATE, UNHEATED.
2. TANK # TK-23 (D166), 4 FT W. X 4 FT H. X 4 FT 4 IN L., NITRIC ACID, AMMONIUM BIFLUORIDE, UNHEATED, AIR SPARGED (MAXIMUM 9 CFM), VENTED TO SCRUBBER "C155".
3. TANK # TK-24 (D167), 4 FT W. X 4 FT H. X 4 FT 4 IN L., NITRIC ACID, AMMONIUM BIFLUORIDE, HEATED, AIR SPARGED (MAXIMUM 9 CFM), VENTED TO SCRUBBER "C155".
4. TANK # TK-27 (D168), 4 FT W. X 4 FT H. X 4 FT 4 IN L., NITRIC ACID, UNHEATED, AIR SPARGED (MAXIMUM 9 CFM), VENTED TO SCRUBBER "C155".
5. TANK # TK-28 (D169), 4 FT W. X 4 FT H. X 4 FT 4 IN L., NITRIC ACID, HEATED, AIR SPARGED (MAXIMUM 9 CFM), VENTED TO SCRUBBER "C83".
6. TANK # TK-33 (D170), 4 FT W. X 4 FT H. X 4 FT 4 IN L., POTASSIUM PERMANGANATE, and POTASSIUM HYDROXIDE, HEATED.
7. ASSOCIATED RINSE TANKS.

Application No. 497485 (Modification, Previous P/O D86395, A/N 297543)

MODIFICATION OF THE EQUIPMENT UNDER P/O D86395 (A/N 297543) BY CORRECTING THE HEIGHT AND LENGTH OF TANKS WITH THE FOLLOWING EQUIPMENT DESCRIPTION:

C-5A CLEANING LINE CONSISTING OF:

1. TANK TK-1 (D156), 4 FT W. X 4 FT H. X 4 FT 4 IN L., (ISOPREP 44L) SODIUM METASILICATE, and SODIUM CARBONATE, HEATED.
2. TANK # TK-4 (D157), 4 FT W. X 4 FT H. X 4 FT 4 IN L., NITRIC ACID, AMMONIUM BIFLUORIDE, UNHEATED, AIR SPARGED (MAXIMUM 9 CFM), VENTED TO SCRUBBER "C83".
3. TANK TK-5 (D158), 4 FT W. X 4 FT H. X 4 FT 4 IN L., NITRIC ACID, UNHEATED, AIR SPARGED (MAXIMUM 9 CFM), VENTED TO SCRUBBER "C83".
4. ASSOCIATED RINSE TANKS.

Application No. 497489 (Modification, Previous P/O D86399, A/N 297547)

MODIFICATION OF THE EQUIPMENT UNDER P/O D86399 (A/N 297547) BY CORRECTING THE HEIGHT AND LENGTH OF TANKS WITH THE FOLLOWING EQUIPMENT DESCRIPTION:

CHEMICAL PROCESS CLEANING LINE "C-5" CONSISTING OF:

1. TANK # TK-9 (D161), 4 FT W. X 4 FT H. X 4 FT 4 IN L., SODIUM METASILICATE, SODIUM CARBONATE, HEATED.

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2. TANK # TK-12 (D162), 4 FT W. X 4 FT H. X 4 FT - 4 IN L., NITRIC ACID, SULFURIC ACID, FERRIC SULFATE, UNHEATED, AIR SPARGED (MAXIMUM 9 CFM), VENTED TO SCRUBBER "C155".
3. TANK # TK-13 (D163), 4 FT W. X 4 FT H. X 4 FT - 4 IN L., NITRIC ACID, SULFURIC ACID, FERRIC SULFATE, HEATED, AIR SPARGED (MAXIMUM 9 CFM), VENTED TO SCRUBBER "C155".
4. TANK # TK-16 (D164), 4 FT W. X 4 FT H. X 4 FT 4 IN L., ALODINE 1200, HEATED, AIR SPARGED (MAXIMUM 9 CFM), VENTED TO SCRUBBER "C155".
5. ASSOCIATED RINSE TANKS.

Application No. 497491 (Modification, Previous P/O D86397, A/N 297545)

MODIFICATION OF THE EQUIPMENT UNDER P/O D86397 (A/N 297545) BY CORRECTING THE HEIGHT AND LENGTH OF TANKS WITH THE FOLLOWING EQUIPMENT DESCRIPTION:

CHEMICAL PROCESS CLEANING LINE "FP-131" CONSISTING OF:

1. TANK # TK-38 (D159), 4 FT W. X 4 FT H. X 4 FT - 4 IN L., OXALIC ACID, ELECTRICALLY HEATED, AIR SPARGED (MAXIMUM 9 CFM), VENTED TO SCRUBBER "C83".
2. TANK # TK-41 (D160), 4 FT W. X 4 FT H. X 4 FT 4 IN L., ALUMINUM, HEATED.
3. ASSOCIATED RINSE TANKS.

Application No. 497493 (Modification, Previous P/O D86116, A/N 297540)

MODIFICATION OF THE EQUIPMENT UNDER P/O D86116 (A/N 297540) BY CHANGING THE MODEL NO. AND BLOWER MOTOR HP WITH THE FOLLOWING EQUIPMENT DESCRIPTION:

SCRUBBER, AIRCHEM SYSTEM, MODEL ~~XF-60~~ FH 55S, 5 FT- 6 IN W. X 6 FT-9 IN H. X 14 FT- 8 IN L. WITH ONE 20 HP BLOWER (C83).

HISTORY

Honeywell filed these applications as Class III for modification of several tank lines by correcting the tank dimensions, and a scrubber to correct the model number and blower HP rating. Honeywell is a RECLAIM Cycle II and Title V Group A facility. The proposed project is considered as a de minimis significant revision (sixth) to the second Title V renewal permit issued to this facility March 25, 2010. Plan A/N 497475 was also submitted for RECLAIM/Title V permit revision.

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The facility has requested that the tank dimensions listed on the permit be corrected to reflect the actual tank dimensions as found in an internal audit. They have not changed the tanks since they were installed but somehow the correct dimensions were not reflected in the permit unit wording. The tanks in these lines are all identical and the ONLY change is that the length is 4 inches more and the height is 6 inches less than listed in the facility permit. The surface area of each of these tanks is 17.32 sq. ft now versus 16 sq. ft before, an increase of 8%. In addition, the acid in Tank D150 was changed from sulfuric acid to oxalic acid. These changes have negligible effects on emissions, if any, as shown by calculation on excel spreadsheets for each line and summarized below. The permit descriptions in the facility permit will also be updated to include if a tank is sparged. Emissions from sparging are included in the spreadsheets.

The changes requested under this project are expected to have negligible changes to toxic (nitric acid, sulfuric acid and chromic acid) or criteria emissions (VOC and PM₁₀) from the permitted process lines. Thus no emission offsets are required for this project. The use of scrubber to control the particulate emissions complies with the current BACT requirements, although BACT is not triggered since the emission increases from each line are well below 1 lb/day. This facility is located in an industrial area and no schools are located within 1000 feet from the property-line. Also, emissions of criteria pollutants from this project are expected to be below the threshold limits. Thus, Rule 212 public notice is not required for this project.

This facility is in the business of manufacturing components for the aerospace industry and has a number of active permits to operate including spray booths, afterburner, plating lines, surface preparation lines, scrubbers, dip-tanks, and jet engine test stands.

The district database shows one notice of violation and no notice to comply issued to this facility in the last two years. The notice of violation no. 12/12/2012 for the Facility's failure to: (1) report the electronic emissions using all proper codes; (2) submit 500-ACC report for CY2011; (3) report accurate fuel usages of Large Source; (4) report accurate fuel usages of Process Units; and (5) report accurate R219 emission, and was closed on 1/10/2013. The database also indicated that there was no public nuisance or visible emission complaints against this facility in the last two years.

PROCESS DESCRIPTION

This facility is a manufacturer of components for aerospace industry. The parts are processed chemically to provide protection against possible abrasion and corrosion and some parts are manufactured for ozone conversion. Mostly parts are either cleaned chemically in these tanks or they get a thin oxide layer on the surface to prevent corrosion. Many of the tanks are heated and air sparged. All the acid tanks are vented to either scrubber C83 or C155.

OPERATING HOURS

Average : 8 hour/day, 7 day/week, 52 weeks/year
Maximum: 24 hour/day, 7 day/week, 52 weeks/year

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EMISSION CALCULATIONS

The facility submitted concentrations of chemicals in the tanks which are used in emission calculations. The VOC and PM₁₀ emissions increases are less than 0.42 lbs/day and as a result no offsets are required and no BACT is required. Please refer to excel spreadsheets in each folder for emissions calculations. Emissions from sparged tanks are calculated in the spreadsheets. There are a few tanks that are not sparged (may be heated) that are not included since the emissions are negligible. The facility submitted current data which are used in the emission calculations. All the heated tanks are either steam heated or have immersed electric coils.

The following table summarizes the changes in equipment:

Appl. No.	Device no.	Prev. A/N	Previous P/O no.	Equipment	Changes
497480	D172	297544	D86396	Process Tanks, Repair & Overhaul Line	Decrease height of each tank by 6 in, Increase length by 4 in., Increase surface area by 1.32 sq. ft.
497484	D165, 166, 167, 168 169 & 170	297546	D86398	Process Tanks, Chem Process Cleaning Line C37	Decrease height of each tank by 6 in, Increase length by 4 in., Increase surface area by 1.32 sq. ft.
497485	D157, 158	297543	D86395	Process Tanks, C-5A Cleaning Line	Decrease height of each tank by 6 in, Increase length by 4 in., Increase surface area by 1.32 sq. ft.
497489	D162, 163 and 164	297547	D86399	Process Tanks, Chem Process Cleaning Line C5	Decrease height of each tank by 6 in, Increase length by 4 in., Increase surface area by 1.32 sq. ft.
497491	D159, 160	297545	D86397	Process Tanks, Chem Process Cleaning Line FP-131	Decrease height of each tank by 6 in, Increase length by 4 in., Increase surface area of each tank by 1.32 sq. ft. Change contents of tank D150 from sulfuric acid to oxalic acid
497493	C83	297540	D 86116	Scrubber venting Devices D157, 158, 159 & 169	Change blower motor HP from 15 HP to 20 HP, update model no.

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The emissions are summarized below.

Appl. no.	Device no.	R1=R2 VOC lbs/hr		VOC Increase	
		Pre-mod	Post-mod	Lb/hr	Lb/day @ 24 hr/day
497480	D172	0.23133	0.24549	0.014	0.34

A/N	Device no.	PM ₁₀ lbs/hr				PM ₁₀ Increase R2	
		Pre-mod		Post-mod		Lb/hr	Lb/day @ 24 hr/day
		R1	R2	R1	R2		
497480	D172	2.59 x 10 ⁻⁵		2.62 x 10 ⁻⁵		Negl.	Negl.
497484	D165-D170	0.3566	0.1426	0.3784	0.1514	0.0088	0.21
497485	D156-D158	0.0292	0.0117	0.0309	0.0124	0.0007	0.02
497489	D161-D164	0.00036	0.00014	0.00038	0.00015	0.00001	0.00024
497491	D159 &D160	0.00019	0.00008	0.00020	0.00008	Negl.	Negl.
TOTAL PM₁₀ INCREASE						0.0095	0.23

There is no expected increase in NO_x emissions as a result of this modification since NO_x is a function of amount of metal removed and this modification is only to increase the tank surface area (by about 8%).

Toxic Emissions (see spreadsheets for evaporative and sparged emissions with individual compounds). Emission increases are below the screening levels, therefore HIA/HIC << 1.

A/N 497480	Emission Increase (lb/hr)	Screening level (lb/hr)
Sodium hydroxide, acute	3.0 x 10 ⁻⁷	0.004

A/N 497484	Emission Increase (lb/hr)	Screening level (lb/hr)
Nitric Acid, acute	0.0087	0.043

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A/N 497485	Emission Increase (lb/hr)	Screening level (lb/hr)
Nitric Acid, acute	0.0007	0.043

A/N 497489	Emission Increase		Screening level	
Nitric Acid, acute	7.0 x 10 ⁻⁶ lb/hr		0.043 lb/hr	
Sulfuric Acid, acute, chronic	3.18 x 10 ⁻⁶ lb/hr		0.06 lb/hr	33.1 lb/yr
Cr ⁺⁶ , cancer, chronic	Negl.	Negl.	-	2.24 x 10 ⁻⁴

A/N 497491	Emission Increase (lb/hr)	Screening level (lb/hr)
Sodium hydroxide, acute	0.0000055	0.004

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. These sources are 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). As shown in the following table, the emission increases are below the daily maximum limits specified by Rule 219(g). Therefore, these applications will not be subject to this section.

LB/DAY	CO	NOX	PM ₁₀	ROG	SOX	Pb
MAX. LIMIT	220	40	30	30	60	3
INCREASES	0	0	0.23	0.34	0	0

√ **SECTION 212(c)(3):**

There are no emission increases in the carcinogenic pollutants. Thus, there is no increase in the cancer risk expected under this project. HIA and HIC are below 1 based on screening levels. Therefore public notice will not be required by this section.

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▼ **SECTION 212(g):**

This section requires a public notice for all new or modified sources which undergo construction or modifications with an emission increases exceeding any of the daily maximum specified in the table below. As shown in the following table, the emission increases are below the daily maximum limits, therefore public notice will not be required by this section.

LB/DAY	CO	NOX	PM ₁₀	ROG	SOX	Pb
MAX. LIMIT	220	40	30	30	3	60
INCREASES	0	0	0 to 0.0088	0.34	0	0

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

With proper operation of the equipment, compliance with the provisions of these rules is expected.

▣ **RULES 404, PARTICULATE MATTER CONCENTRATION**

With the use of particulate control device of scrubbers, compliance with the provisions of this rule is expected.

REGULATION XIII

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

BACT is not triggered for VOC or PM₁₀ since the emission increases from the modifications are less than 1 lb/day.

▣ **RULE 1303(b)(1), MODELING**

No detailed modeling analysis is required since PM₁₀ emission increase from each tank line (and total increase) is below the Table A-1 allowable emissions for non combustion sources. Modeling is not required for VOC.

Appl. No.	PM ₁₀ Emission Increase (lb/hr)	Allowable PM ₁₀ (lb/hr)
497480	Negl.	0.41
497484	0.0088	
497485	0.0007	
497489	0.00001	
497491	Negl.	

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

The total emission increase of VOC and PM₁₀ from this project are 0.34 and 0.23 lb/day respectively. Hence, emission offsets are not required since < 0.42 lb/day.

▣ **RULE 1401, NEW SOURCE REVIEW OF CARCINOGENIC/TOXIC AIR CONTAMINANTS**

There is a very small increase in nitric acid and sodium hydroxide emissions as a result of this modification.

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Appl. No.	Device no.	Rule 1401 Compliance Status
497480	D172	Increase in sodium hydroxide but less than screening level
497484	D165, 166, 167, 168 169 & 170	Increase in nitric acid but less than screening level
497485	D157, 158	
497489	D162, 163 and 164	Increase in nitric acid and sulfuric acid but less than screening levels
497491	D159, 160	Increase in sodium hydroxide but less than screening level
497493	C83	APC – no increase

REGULATION XXX:

This facility is in the RECLAIM program. The proposed project is considered as a “de minimis significant permit revision” to the second Title V renewal permit issued to this facility March 25, 2010 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. Rule 3000(b)(6) defines a “de minimis significant permit revision” as any Title V permit revision where the cumulative emission increases on non-RECLAIM pollutants or hazardous air pollutants (HAP) 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

Rule 3003(j) specifies that a proposed permit shall be submitted to EPA for review. To determine if a project qualifies for a “de minimis significant permit revision”, emission increases resulting from all permit revisions that are made after the submittal of proposed permit to EPA shall be accumulated and compared to the above threshold levels.

This is the sixth permit revision to the Title V Permit since the last renewal. The cumulative emission increases resulting from this proposed permit revision are summarized as follows:

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	Revision	HAP	VOC	NOx	PM ₁₀	SOx	CO
1 st	Add new laser cutter and dust collector A/Ns 497492 and 512708	0	0	0	0	0	0
2 nd	Modification of the Nickel powder application system A/N 515813 - P/C	0	0	0	0	0	0
3 rd	Admin: Convert P/C to P/O for A/Ns 498864 (boiler), 498865 (surface prep line), 498866 (scrubber), 501172 (spray booth) and 515813 (Ni powder system)	0	0	0	0	0	0
4 th	Admin: Remove permit condition I296.1(device D217)	0	0	0	0	0	0
5 th	Addition of two braze furnaces (A/N 475875 and 476239),	0	0	0	0	0	0
	Addition of a dip tank (a/n 475872) and a wash coat system (A/N 475873), modification & C/C to APC system to vent dip tank and wash coat system (A/N 475874), and C/C for two dip tanks to change group VOC cap (A/N 549189 & 549192)	0	0	0	0	0	0
	Administrative change from P/C to P/O for A/Ns 475879, 475881, 475882, 475895, 475896, 475898 476237 and 486027.						
6 th	Modification to 5 process tank lines (A/Ns 497480, 497484, 497485, 497489 and 497491 and one scrubber (A/N 497493)	0	0.34	0	0.23	0	0
	Cumulative Total	0	0	0	0	0	0
	Maximum Daily	30	30	40	30	60	220

Since this is a NOx RECLAIM facility, an analysis must be made to ensure that the proposed permit revision is not considered a “significant permit revision”. However, there are no NOx emission increases from this project. As a result, the proposed permit revision is considered as a “minor” permit revision for NOx.

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CONCLUSIONS/RECOMMENDATIONS

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/minor 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 45-day review pursuant to Rule 3003(j). If EPA does not raise any objections within the review period, a revised RECLAIM/Title V permit will be issued to this facility with updated Permits to Operate issued for this equipment in Section D.

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Summary of 1401 compounds in each tank

A/N	Device No.	Tank No.	Rule 1401 Compound
497480	D171	TK-44	Sodium hydroxide
	D172	TK-47	-
497484	D165	TK-20	-
	D166	TK-23	Nitric acid
	D167	TK-24	Nitric acid
	D168	TK-27	Nitric acid
	D169	TK-28	Nitric acid
	D170	TK-33	-
497485	D156	TK-1	-
	D157	TK-4	Nitric acid
	D158	TK-5	Nitric acid
497489	D161	TK-9	-
	D162	TK-12	Nitric acid
			Sulfuric acid
	D163	TK-13	Nitric acid
			Sulfuric acid
D164	TK-16	Chromic acid (Cr ⁺⁶)	
497491	D159	TK-38	-
	D160	TK-41	Sodium hydroxide

Rule 1401 Conditions (effective date March 7, 2008):

- B59.26 with no exceptions (D156, D159, D161, D165, D170, D172)
- B59.7 except nitric acid only (D157, D158, D166, D167, D168, D169)
- B59.24 except sodium hydroxide (D171, D160)
- B59.27 except nitric acid and sulfuric acid (D162, D163)
- B59.28 except chromic acid/C r⁺⁶ (D164)