



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

June 17, 2010

Mr. Gerardo Rios
Chief - Permits Office
U. S. EPA, Region IX
75 Hawthorne Street, Air 3
San Francisco, CA 94105

Reference: Transmittal of Proposed Title V Renewal Permit

Dear Mr. Rios:

Enclosed are the proposed Title V renewal permit, permit summary, statement of basis, public notice, and permit evaluation for Sapa Extruder, Inc. located at 18111 E. Railroad Street, City of Industry, CA 91748. Incorporated into this Title V renewal permit is the addition of pre-heat furnace D66, replacing pre-heat furnace D10. With your receipt of the proposed Title V renewal permits today, we will note that the EPA 45-day review period will begin on June 17, 2010.

Questions on the proposed Title V renewal permit should be directed to Kien Huynh of my staff at (909) 396-2635.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian L. Yeh", is written over a large, stylized, light-colored scribble or watermark.

Brian L. Yeh
Senior Manager
Chemical/Mechanical Operations

BLY:kh

Enclosures:

- Proposed Title V Renewal Permit
- Permit Summary
- Statement of Basis
- Public Notice
- Permit Evaluation

FACILITY PERMIT TO OPERATE

**SAPA EXTRUDER, INC
18111 E RAILROAD ST
CITY OF INDUSTRY, CA 91748**

NOTICE

IN ACCORDANCE WITH RULE 206, THIS PERMIT TO OPERATE OR A COPY THEREOF MUST BE KEPT AT THE LOCATION FOR WHICH IT IS ISSUED.

THIS PERMIT DOES NOT AUTHORIZE THE EMISSION OF AIR CONTAMINANTS IN EXCESS OF THOSE ALLOWED BY DIVISION 26 OF THE HEALTH AND SAFETY CODE OF THE STATE OF CALIFORNIA OR THE RULES OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT. THIS PERMIT SHALL NOT BE CONSTRUED AS PERMISSION TO VIOLATE EXISTING LAWS, ORDINANCES, REGULATIONS OR STATUTES OF ANY OTHER FEDERAL, STATE OR LOCAL GOVERNMENTAL AGENCIES.

Barry R. Wallerstein, D. Env.
EXECUTIVE OFFICER

By _____
Mohsen Nazemi, P.E.
Deputy Executive Officer
Engineering & Compliance

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

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FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

SECTION A: FACILITY INFORMATION

LEGAL OWNER &/OR OPERATOR: SAPA EXTRUDER, INC

LEGAL OPERATOR (if different than owner):

EQUIPMENT LOCATION: 18111 E RAILROAD ST
CITY OF INDUSTRY, CA 91748-1295

MAILING ADDRESS: 18111 E RAILROAD ST
CITY OF INDUSTRY, CA 91748-1295

RESPONSIBLE OFFICIAL: J PATRICK MEYER

TITLE: MANAGER

TELEPHONE NUMBER: (626) 964-3411

CONTACT PERSON: J PATRICK MEYER

TITLE: MANAGER

TELEPHONE NUMBER: (626) 964-3411

TITLE V PERMIT ISSUED: July 01, 2005

TITLE V PERMIT EXPIRATION DATE: June 30, 2010

TITLE V	RECLAIM
YES	NOx: YES SOx: NO CYCLE: 2 ZONE: INLAND

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

SECTION B: RECLAIM ANNUAL EMISSION ALLOCATION

The annual allocation of NOx RECLAIM Trading Credits (RTCs) for this facility is calculated pursuant to Rule 2002. Total NOx emission shall not exceed such annual allocations unless the operator obtains RTCs corresponding to the facility's increased emissions in compliance with Rules 2005 and 2007.

The level of Starting Allocation plus Non-Tradable Credits used to determine compliance with Rule 2005(c)(4) and applicability of Rule 2005(e) - Trading Zone Restrictions is listed on the last page of this Section.

The following table lists the annual allocations that were issued to this facility and the amounts of RTCs held by this facility on the day of printing this Section.

RECLAIM POLLUTANT ANNUAL ALLOCATION (POUNDS)

Year Begin End (month/year)	Zone	NOx RTC Initially Allocated	NOx RTC ¹ Holding as of 06/10/2010 (pounds)	Non-Tradable ² Non-Usable RTCs (pounds)
1/2009 12/2009	Coastal	0	6000	0
7/2009 6/2010	Coastal	0	13688	0
7/2009 6/2010	Inland	11192	9278	0
1/2010 12/2010	Coastal	0	8020	0
7/2010 6/2011	Coastal	0	13242	0
7/2010 6/2011	Inland	11192	8976	0
1/2011 12/2011	Coastal	0	7750	0
7/2011 6/2012	Coastal	0	12796	0
7/2011 6/2012	Inland	11192	8674	0
1/2012 12/2012	Coastal	0	7750	0
7/2012 6/2013	Coastal	0	12796	0
7/2012 6/2013	Inland	11192	8674	0
1/2013 12/2013	Coastal	0	7750	0
7/2013 6/2014	Coastal	0	12796	0
7/2013 6/2014	Inland	11192	8674	0
1/2014 12/2014	Coastal	0	7750	0
7/2014 6/2015	Coastal	0	12796	0

Footnotes:

1. This number may change due to pending trades, emissions reported under Quarterly Certification of Emissions Report (QCER) and Annual Permit Emission Program (APEP) Report required pursuant to Rule 2004, or deductions made pursuant to Rule 2010(b). The most recent total RTC information can be obtained from the District's RTC Listing.
2. The use of such credits is subject to restrictions set forth in paragraph (f)(1) of Rule 2002.

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

SECTION B: RECLAIM ANNUAL EMISSION ALLOCATION

The annual allocation of NOx RECLAIM Trading Credits (RTCs) for this facility is calculated pursuant to Rule 2002. Total NOx emission shall not exceed such annual allocations unless the operator obtains RTCs corresponding to the facility's increased emissions in compliance with Rules 2005 and 2007.

The level of Starting Allocation plus Non-Tradable Credits used to determine compliance with Rule 2005(c)(4) and applicability of Rule 2005(e) - Trading Zone Restrictions is listed on the last page of this Section.

The following table lists the annual allocations that were issued to this facility and the amounts of RTCs held by this facility on the day of printing this Section.

RECLAIM POLLUTANT ANNUAL ALLOCATION (POUNDS)

Year Begin End (month/year)	Zone	NOx RTC Initially Allocated	NOx RTC ¹ Holding as of 06/10/2010 (pounds)	Non-Tradable ² Non-Usable RTCs (pounds)
7/2014 6/2015	Inland	11192	8674	0
1/2015 12/2015	Coastal	0	7750	0
7/2015 6/2016	Coastal	0	12796	0
7/2015 6/2016	Inland	11192	8674	0
1/2016 12/2016	Coastal	0	7750	0
7/2016 6/2017	Coastal	0	12796	0
7/2016 6/2017	Inland	11192	8674	0
1/2017 12/2017	Coastal	0	7750	0
7/2017 6/2018	Coastal	0	12796	0
7/2017 6/2018	Inland	11192	8674	0
1/2018 12/2018	Coastal	0	7750	0
7/2018 6/2019	Coastal	0	12796	0
7/2018 6/2019	Inland	11192	8674	0
1/2019 12/2019	Coastal	0	7750	0
7/2019 6/2020	Coastal	0	12796	0
7/2019 6/2020	Inland	11192	8674	0
1/2020 12/2020	Coastal	0	7750	0

Footnotes:

- This number may change due to pending trades, emissions reported under Quarterly Certification of Emissions Report (QCER) and Annual Permit Emission Program (APEP) Report required pursuant to Rule 2004, or deductions made pursuant to Rule 2010(b). The most recent total RTC information can be obtained from the District's RTC Listing.
- The use of such credits is subject to restrictions set forth in paragraph (f)(1) of Rule 2002.

**FACILITY PERMIT TO OPERATE
 SAPA EXTRUDER, INC**

SECTION B: RECLAIM ANNUAL EMISSION ALLOCATION

The annual allocation of NOx RECLAIM Trading Credits (RTCs) for this facility is calculated pursuant to Rule 2002. Total NOx emission shall not exceed such annual allocations unless the operator obtains RTCs corresponding to the facility's increased emissions in compliance with Rules 2005 and 2007.

The level of Starting Allocation plus Non-Tradable Credits used to determine compliance with Rule 2005(c)(4) and applicability of Rule 2005(e) - Trading Zone Restrictions is listed on the last page of this Section.

The following table lists the annual allocations that were issued to this facility and the amounts of RTCs held by this facility on the day of printing this Section.

RECLAIM POLLUTANT ANNUAL ALLOCATION (POUNDS)

Year Begin End (month/year)	Zone	NOx RTC Initially Allocated	NOx RTC ¹ Holding as of 06/10/2010 (pounds)	Non-Tradable ² Non-Usable RTCs (pounds)
7/2020 6/2021	Coastal	0	12796	0
7/2020 6/2021	Inland	11192	8674	0
1/2021 12/2021	Coastal	0	7750	0
7/2021 6/2022	Coastal	0	12796	0
7/2021 6/2022	Inland	11192	8674	0
1/2022 12/2022	Coastal	0	7750	0
7/2022 6/2023	Coastal	0	12796	0
7/2022 6/2023	Inland	11192	8674	0
1/2023 12/2023	Coastal	0	7750	0
7/2023 6/2024	Coastal	0	12796	0
7/2023 6/2024	Inland	11192	8674	0
1/2024 12/2024	Coastal	0	7750	0
7/2024 6/2025	Coastal	0	12796	0
7/2024 6/2025	Inland	11192	8674	0
1/2025 12/2025	Coastal	0	7750	0

Footnotes:

1. This number may change due to pending trades, emissions reported under Quarterly Certification of Emissions Report (QCER) and Annual Permit Emission Program (APEP) Report required pursuant to Rule 2004, or deductions made pursuant to Rule 2010(b). The most recent total RTC information can be obtained from the District's RTC Listing.
2. The use of such credits is subject to restrictions set forth in paragraph (f)(1) of Rule 2002.

**FACILITY PERMIT TO OPERATE
 SAPA EXTRUDER, INC**

SECTION B: RECLAIM ANNUAL EMISSION ALLOCATION

The annual allocation of RECLAIM Trading Credits (RTCs) for this facility is calculated pursuant to Rule 2002. If the facility submits a permit application to increase in an annual allocation to a level greater than the facility's starting Allocation plus Non-Tradable credits as listed below, the application will be evaluated for compliance with Rule 2005 (c)(4). Rule 2005 (e) - Trading Zone Restrictions applies if an annual allocation is increased to a level greater than the facility's Starting Allocation plus Non-Tradable Credits:

Year		Zone	NO _x RTC	Non-Tradable
Begin	End		Starting Allocation	Credits(NTC)
(month/year)			(pounds)	(pounds)
7/1994	6/1995	Inland	30832	0

**FACILITY PERMIT TO OPERATE
SAPA EXTRUDER, INC**

SECTION C: FACILITY PLOT PLAN

(TO BE DEVELOPED)

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 1: SECONDARY METALS, ALUMINUM					
System 2: ANNEALING					
FURNACE, BILLET PREHEAT (9"), NATURAL GAS, PROPANE. ALUMINUM, BELCO, 4.2 MMBTU/HR WITH A/N: 502266 BURNER, NATURAL GAS, NORTH AMERICAN, MODEL 3065-7-30, 4 TOTAL; 1.05 MMBTU/HR	D6		NOX: PROCESS UNIT**	CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; NOX: 12.8 LBS/1000 GAL LPG (1) [RULE 2012, 5-6-2005]; NOX: 130 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 5-6-2005]; PM: (9) [RULE 404, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]	B59.1, B75.1
FURNACE, BILLET PREHEAT (11"), NATURAL GAS, PROPANE, ALUMINUM, BELCO, 4.4 MMBTU/HR WITH A/N: 502267 BURNER, NATURAL GAS, NORTH AMERICAN, MODEL 3065-7-30, 5 TOTAL; 0.88 MMBTU/HR	D7		NOX: PROCESS UNIT**	CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; NOX: 12.8 LBS/1000 GAL LPG (1) [RULE 2012, 5-6-2005]; NOX: 130 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 5-6-2005]; PM: (9) [RULE 404, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]	B59.1, B75.1

* (1) (1A) (1B) Denotes RECLAIM emission factor
 (3) Denotes RECLAIM concentration limit
 (5) (5A) (5B) Denotes command and control emission limit
 (7) Denotes NSR applicability limit
 (9) See App B for Emission Limits
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (4) Denotes BACT emission limit
 (6) Denotes air toxic control rule limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (10) See section J for NESHAP/MACT requirements
 ** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 1: SECONDARY METALS, ALUMINUM					
FURNACE, AGING, NO.1, NATURAL GAS, PROPANE, ALUMINUM, DISPATCH, 4 MMBTU/HR WITH A/N: 502268 BURNER, NATURAL GAS, NORTH AMERICAN, MODEL 4545-8A, 1 TOTAL; 4 MMBTU/HR	D8		NOX: PROCESS UNIT**	CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; NOX: 12.8 LBS/1000 GAL LPG (1) [RULE 2012, 5-6-2005]; NOX: 130 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 5-6-2005]; PM: (9) [RULE 404, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]	B59.1, B75.1
FURNACE, AGING, NO.2, NATURAL GAS, PROPANE, ALUMINUM, OLIVER, 3 MMBTU/HR WITH A/N: 502269 BURNER, NATURAL GAS, ECLIPSE, MODEL 300 MF-G MARK 4, 1 TOTAL; 3 MMBTU/HR	D9		NOX: PROCESS UNIT**	CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; NOX: 12.8 LBS/1000 GAL LPG (1) [RULE 2012, 5-6-2005]; NOX: 130 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 5-6-2005]; PM: (9) [RULE 404, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]	B59.1, B75.1

- * (1) (1A) (1B) Denotes RECLAIM emission factor
- (3) Denotes RECLAIM concentration limit
- (5) (5A) (5B) Denotes command and control emission limit
- (7) Denotes NSR applicability limit
- (9) See App B for Emission Limits
- (2) (2A) (2B) Denotes RECLAIM emission rate
- (4) Denotes BACT emission limit
- (6) Denotes air toxic control rule limit
- (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
- (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 1: SECONDARY METALS, ALUMINUM					
FURNACE, BILLET PREHEAT (7"), NATURAL GAS, PROPANE, ALUMINUM, GRANCO, 9 MMBTU/HR WITH A/N: 502270 BURNER, NATURAL GAS, NORTH AMERICAN, MODEL 65-7-30, 5 TOTAL; 1.8 MMBTU/HR	D10		NOX: PROCESS UNIT**	CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; NOX: 12.8 LBS/1000 GAL LPG (1) [RULE 2012, 5-6-2005]; NOX: 130 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 5-6-2005]; PM: (9) [RULE 404, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]	B59.1, B75.1
FURNACE, AGING, NO.4, NATURAL GAS, PROPANE, ALUMINUM, GRANCO, 2.5 MMBTU/HR WITH A/N: 502273 BURNER, NATURAL GAS, NORTH AMERICAN, MODEL 4988-2500, 1 TOTAL; 2.5 MMBTU/HR	D14		NOX: PROCESS UNIT**	CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; NOX: 12.8 LBS/1000 GAL LPG (1) [RULE 2012, 5-6-2005]; NOX: 130 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 5-6-2005]; PM: (9) [RULE 404, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]	B59.1, B75.1

- * (1) (1A) (1B) Denotes RECLAIM emission factor
 - (3) Denotes RECLAIM concentration limit
 - (5) (5A) (5B) Denotes command and control emission limit
 - (7) Denotes NSR applicability limit
 - (9) See App B for Emission Limits
 - (2) (2A) (2B) Denotes RECLAIM emission rate
 - (4) Denotes BACT emission limit
 - (6) Denotes air toxic control rule limit
 - (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 - (10) See section J for NESHAP/MACT requirements
- ** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 1: SECONDARY METALS, ALUMINUM					
FURNACE, AGING, NO. 3, NATURAL GAS, PROPANE, ALUMINUM, GERREF, 2.5 MMBTU/HR WITH A/N: 502275 BURNER, NATURAL GAS, MAXON, MODEL 425, 1 TOTAL; 2.5 MMBTU/HR	D15		NOX: PROCESS UNIT**	CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; NOX: 12.8 LBS/1000 GAL LPG (1) [RULE 2012, 5-6-2005]; NOX: 130 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 5-6-2005]; PM: (9) [RULE 404, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]	B59.1, B75.1
FURNACE, AGING, NO. 5, ELHAUS, MODEL NO. S3984, NATURAL GAS, ALUMINUM, WITH LOW NOX BURNER, 5.1 MMBTU/HR WITH A/N: 502263 BURNER, NATURAL GAS, MAXON, MODEL 0.8M PACKAGED CYCLOMAX, WITH LOW NOX BURNER. 6 TOTAL; 0.85 MMBTU/HR	D54		NOX: PROCESS UNIT**	CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; NOX: 30 PPMV NATURAL GAS (4) [RULE 2005, 5-6-2005]; NOX: 30 PPMV NATURAL GAS (3) [RULE 2012, 5-6-2005]; PM: (9) [RULE 404, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]	B59.1, C1.5, D28.1, K67.4
Process 2: FABRICATED METALS, CONVERSION COATING					
SCRUBBER, PACKED BED, WIDTH: 4 FT, HEIGHT: 5 FT 2 IN, LENGTH: 7 FT A/N: 502274	C16				C6.1, D12.3, D12.5, K67.1

* (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 5: R-219 EXEMPT EQUIPMENT SUBJECT TO SOURCE-SPECIFIC RULES					
RULE 219 EXEMPT EQUIPMENT, COATING EQUIPMENT, PORTABLE, ARCHITECTURAL COATINGS	E44			ROG: (9) [RULE 1113, 11-8-1996; RULE 1113, 7-13-2007; RULE 1171, 11-7-2003; RULE 1171, 5-1-2009]	K67.2
RULE 219 EXEMPT EQUIPMENT, AIR CONDITIONING UNITS	E65				H23.1
Process 6: ABRASIVE BLASTING					
ABRASIVE BLASTING, CABINET, GUYSON, MODEL GWB401T, ONE 5-HP WHEEL, METALBEADS, WITH CYCLONE, FABRIC FILTER, 1 TOTAL, WIDTH: 6 FT 8 IN; HEIGHT: 11 FT 10 IN; LENGTH: 6 FT 3 IN WITH A/N: 502279	D45			PM: (9) [RULE 1140, 2-1-1980; RULE 1140, 8-2-1985; RULE 404, 2-7-1986; RULE 405, 2-7-1986]	C6.2, D322.1, E448.1, K67.3
BUCKET ELEVATOR, 1 TOTAL	D46				

* (1) (1A) (1B) Denotes RECLAIM emission factor
 (3) Denotes RECLAIM concentration limit
 (5) (5A) (5B) Denotes command and control emission limit
 (7) Denotes NSR applicability limit
 (9) See App B for Emission Limits
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (4) Denotes BACT emission limit
 (6) Denotes air toxic control rule limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

**FACILITY PERMIT TO OPERATE
SAPA EXTRUDER, INC**

SECTION D: DEVICE ID INDEX

**The following sub-section provides an index
to the devices that make up the facility
description sorted by device ID.**

**FACILITY PERMIT TO OPERATE
SAPA EXTRUDER, INC
SECTION D: DEVICE ID INDEX**

Device Index For Section D			
Device ID	Section D Page No.	Process	System
D6	1	1	2
D7	1	1	2
D8	2	1	2
D9	2	1	2
D10	3	1	2
D14	3	1	2
D15	4	1	2
C16	4	2	0
E44	5	5	0
D45	5	6	0
D46	5	6	0
D54	4	1	2
E65	5	5	0

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

DEVICE CONDITIONS

B. Material/Fuel Type Limits

B59.1 The operator shall not use the following material(s) in this device :

Metal contaminated with rubber, plastic, paper, rags, oil, grease

Smoke producing material

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 401, 3-2-1984; RULE 401, 11-9-2001]

[Devices subject to this condition : D6, D7, D8, D9, D10, D14, D15, D54]

B75.1 The operator shall not use propane in this equipment except under the following circumstance(s):

Natural gas curtailment

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition : D6, D7, D8, D9, D10, D14, D15]

C. Throughput or Operating Parameter Limits

C1.5 The operator shall limit the natural gas fuel usage to no more than 2.304 MM cubic feet per month.

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

To comply with this condition, the operator shall install and maintain a(n) non-resettable totalizing fuel meter to accurately indicate the fuel usage of the furnace.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D54]

- C6.1 The operator shall use this equipment in such a manner that the pH being monitored, as indicated below, does not exceed 9.5 of the pH scale.

To comply with this condition, the operator shall monitor the pH as specified in Condition D12.3.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition : C16]

- C6.2 The operator shall use this equipment in such a manner that the differential pressure being monitored, as indicated below, does not exceed 2.5 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 filter.

The operator shall maintain records in a manner approved by the District, to demonstrate compliance with this condition.

The operator shall record the parameter being monitored once every 7 days.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition : D45]

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

D. Monitoring/Testing Requirements

- D12.3 The operator shall install and maintain a(n) pH meter to accurately indicate the pH in the scrubber solution.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition : C16]

- D12.5 The operator shall install and maintain a(n) flow meter to accurately indicate the flow rate of the scrubbing solution circulated through the scrubber.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition : C16]

- D28.1 The operator shall conduct source test(s) in accordance with the following specifications:

The test shall be conducted to determine the NOX emissions at the outlet.

The test shall be conducted every five-year period, with the first five year-period ending June 30, 2010.

The test shall be conducted within 12 months of the approval of the concentration limit.

[RULE 2012, 5-6-2005]

[Devices subject to this condition : D54]

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

D322.1 The operator shall perform annual inspection of the equipment and filter media for leaks, broken or torn filter media, and improperly installed filter media.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : D45]

E. Equipment Operation/Construction Requirements

E448.1 The operator shall comply with the following requirements:

Dust collected in the baghouse shall be discharged only into enclosed containers or returned to process and shall not be handled in a manner that may result in the re-release of collected materials to the atmosphere.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002; RULE 401, 3-2-1984; RULE 401, 11-9-2001]

[Devices subject to this condition : D45]

H. Applicable Rules

H23.1 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
Refrigerants	District Rule	1415

[RULE 1415, 10-14-1994]

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

[Devices subject to this condition : E65]

K. Record Keeping/Reporting

K67.1 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

On a daily basis: The pH of the scrubbing solution

On a daily basis: The flow rate of the scrubbing solution

[**RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002**]

[Devices subject to this condition : C16]

K67.2 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

For architectural applications where no thinners, reducers, or other VOC containing materials are added, maintain semi-annual records for all coating consisting of (a) coating type, (b) VOC content as supplied in grams per liter (g/l) of materials for low-solids coatings, (c) VOC content as supplied in g/l of coating, less water and exempt solvent, for other coatings.

For architectural applications where thinners, reducers, or other VOC containing materials are added, maintain daily records for each coating consisting of (a) coating type, (b) VOC content as applied in grams per liter (g/l) of materials used for low-solids coatings, (c) VOC content as applied in g/l of coating, less water and exempt solvent, for other coatings.

[**RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997**]

[Devices subject to this condition : E44]

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

K67.3 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

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : D45]

K67.4 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

Monthly natural gas usage of devices D1 and D3

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D54]

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

SECTION E: ADMINISTRATIVE CONDITIONS

The operating conditions in this section shall apply to all permitted equipment at this facility unless superseded by condition(s) listed elsewhere in this permit.

1. The permit shall remain effective unless this permit is suspended, revoked, modified, reissued, denied, or it is expired for nonpayment of permit processing or annual operating fees. [201, 203, 209, 301]
 - a. The permit must be renewed annually by paying annual operating fees, and the permit shall expire if annual operating fees are not paid pursuant to requirements of Rule 301(d). [301(d)]
 - b. The Permit to Construct listed in Section H shall expire one year from the Permit to Construct issuance date, unless a Permit to Construct extension has been granted by the Executive Officer or unless the equipment has been constructed and the operator has notified the Executive Officer prior to the operation of the equipment, in which case the Permit to Construct serves as a temporary Permit to Operate. [202, 205]
 - c. The Title V permit shall expire as specified under Section K of the Title V permit. The permit expiration date of the Title V facility permit does not supercede the requirements of Rule 205. [205, 3004]
2. The operator shall maintain all equipment in such a manner that ensures proper operation of the equipment. [204]
3. This permit does not authorize the emissions of air contaminants in excess of those allowed by Division 26 of the Health and Safety Code of the State of California or the Rules and Regulations of the AQMD. This permit cannot be considered as permission to violate existing laws, ordinances, regulations or statutes of other governmental agencies. [204]
4. The operator shall not use equipment identified in this facility permit as being connected to air pollution control equipment unless they are so vented to the identified air pollution control equipment which is in full use and which has been included in this permit. [204]

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

SECTION E: ADMINISTRATIVE CONDITIONS

5. The operator shall not use any equipment having air pollution control device(s) incorporated within the equipment unless the air pollution control device is in full operation. [204]
6. The operator shall maintain records to demonstrate compliance with rules or permit conditions that limit equipment operating parameters, or the type or quantity of material processed. These records shall be made available to AQMD personnel upon request and be maintained for at least: [204]
 - a. Three years for a facility not subject to Title V; or
 - b. Five years for a facility subject to Title V.
7. The operator shall maintain and operate all equipment to ensure compliance with all emission limits as specified in this facility permit. Compliance with emission limits shall be determined according to the following specifications, unless otherwise specified by AQMD rules or permit conditions: [204]
 - a. For internal combustion engines and gas turbines, measured concentrations shall be corrected to 15 percent stack-gas oxygen content on a dry basis and be averaged over a period of 15 consecutive minutes; [1110.2, 1134, 204]
 - b. For other combustion devices, measured concentrations shall be corrected to 3 percent stack-gas oxygen content on a dry basis and be averaged over a period of 15 consecutive minutes; [1146, 1146.1, 204]
 - c. For a large NO_x source, compliance with a RECLAIM concentration limit shall be measured over a continuous 60 minutes for that source; [2012]
 - d. For non-combustion sources, compliance with emission limits shall be determined and averaged over a period of 60 minutes. [204]

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

SECTION E: ADMINISTRATIVE CONDITIONS

- e. For the purpose of determining compliance with Rule 407, carbon monoxide (CO) shall be measured on a dry basis and be averaged over 15 consecutive minutes, and sulfur compound which would exist as liquid or gas at standard conditions shall be calculated as sulfur dioxide (SO₂) and be averaged over 15 consecutive minutes; [407]
- f. For the purpose of determining compliance with Rule 409, combustion contaminant emission measurements shall be corrected to 12 percent carbon dioxide (CO₂) at standard conditions and averaged over 15 consecutive minutes. [409]
- g. For the purpose of determining compliance with Rule 475, combustion contaminant emission measurements shall be corrected to 3 percent of oxygen (O₂) at standard conditions and averaged over 15 consecutive minutes or any other averaging time specified by the Executive Officer. [475]
8. All equipment operating under the RECLAIM program shall comply concurrently with all provisions of AQMD Rules and Regulation, except those listed in Table 1 of Rule 2001 for NO_x RECLAIM sources and Table 2 of Rule 2001 for SO_x RECLAIM sources. Those provisions listed in Tables 1 or 2 shall not apply to NO_x or SO_x emissions after the date the facility has demonstrated compliance with all monitoring and reporting requirements of Rules 2011 or 2012, as applicable. Provisions of the listed AQMD rules in Tables 1 or 2 which have initial implementation dates in 1994 shall not apply to a RECLAIM NO_x or SO_x source, respectively. [2001]
9. The operator shall, when a source test is required by AQMD, provide a source test protocol to AQMD no later than 60 days before the proposed test date. The test shall not commence until the protocol is approved by AQMD. The test protocol shall contain the following information: [204, 304]
 - a. Brief description of the equipment tested.

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

SECTION E: ADMINISTRATIVE CONDITIONS

- b. Brief process description, including maximum and normal operating temperatures, pressures, through-put, etc.
 - c. Operating conditions under which the test will be performed.
 - d. Method of measuring operating parameters, such as fuel rate and process weight. Process schematic diagram showing the ports and sampling locations, including the dimensions of the ducts/stacks at the sampling locations, and distances of flow disturbances, (e.g. elbows, tees, fans, dampers) from the sampling locations (upstream and downstream).
 - e. Brief description of sampling and analytical methods used to measure each pollutant, temperature, flow rates, and moisture.
 - f. Description of calibration and quality assurance procedures.
 - g. Determination that the testing laboratory qualifies as an "independent testing laboratory" under Rule 304 (no conflict of interest).
10. The operator shall submit a report no later than 60 days after conducting a source test, unless otherwise required by AQMD Rules or equipment-specific conditions. The report shall contain the following information: [204]
- a. The results of the source test.
 - b. Brief description of the equipment tested.
 - c. Operating conditions under which the test will be performed.
 - d. Method of measuring operating parameters, such as fuel rate and process weight. Process schematic diagram showing the ports and sampling locations, including the dimensions of the ducts/stacks at the sampling locations, and distances of flow disturbances, (e.g. elbows, tees, fans, dampers) from the sampling locations (upstream and downstream).
 - e. Field and laboratory data forms, strip charts and analyses.

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

SECTION E: ADMINISTRATIVE CONDITIONS

- f. Calculations for volumetric flow rates, emission rates, control efficiency, and overall control efficiency.
- 11. The operator shall, when a source test is required, provide and maintain facilities for sampling and testing. These facilities shall comply with the requirements of AQMD Source Test Method 1.1 and 1.2. [217]
- 12. Whenever required to submit a written report, notification or other submittal to the Executive Officer, AQMD, or the District, the operator shall mail or deliver the material to: Deputy Executive Officer, Engineering and Compliance, AQMD, 21865 E. Copley Drive, Diamond Bar, CA 91765-4182. [204]

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

SECTION F: RECLAIM MONITORING AND SOURCE TESTING REQUIREMENTS

The Facility shall comply with all applicable monitoring and source testing requirements in Regulation XX. These requirements may include but are not limited to the following:

I. NOx Monitoring Conditions

A. The Operator of a NOx Major Source, as defined in Rule 2012, shall, as applicable:

Not Applicable

B. The Operator of a NOx large Source, as defined in Rule 2012, shall, as applicable:

Not Applicable

C. The Operator of a NOx Process Unit, as defined in Rule 2012, shall, as applicable:

1. Install, maintain, and operate a totalizing fuel meter or any device approved by the Executive Officer to measure quarterly fuel usage or other applicable variables specified in Rule 2012, Table 2012-1, and Rule 2012, Appendix A, Table 4-A. The sharing of totalizing fuel meters may be allowed by the Executive Officer if the fuel meter serves process units which have the same emission factor or emission rate. The sharing of totalizing meter shall not be allowed for process units which are required to comply with an annual heat input limit. [2012]

II. NOx Source Testing and Tune-up conditions

1. The operator shall conduct all required NOx source testing in compliance with an AQMD-approved source test protocol. [2012]

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

SECTION F: RECLAIM MONITORING AND SOURCE TESTING REQUIREMENTS

2. The operator shall, as applicable, conduct source tests for every large NO_x source no later than June 30, 1997 and every 3 years thereafter. The source test shall include the determination of NO_x concentration and a relative accuracy audit of the exhaust stack flow determination (e.g. in-stack flow monitor or fuel flow monitor based F-factor calculation). Such source test results shall be submitted per the schedule described by APEP. In lieu of submitting the first source test report, the facility permit holder may submit the results of a source test not more than 3 years old which meets the requirements when conducted. [2012]
3. All NO_x large sources and NO_x process units shall be tuned-up in accordance with the schedule specified in Rule 2012, Appendix A, Chapter 5, Table 5-B. [2012]

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

SECTION G: RECORDKEEPING AND REPORTING REQUIREMENTS FOR RECLAIM SOURCES

The Facility shall comply with all applicable reporting and recordkeeping requirements in Regulation XX. These requirements may include but are not limited to the following:

I. Recordkeeping Requirements for all RECLAIM Sources

1. The operator shall maintain all monitoring data required to be measured or reported pursuant to Rule 2011 and Rule 2012, whichever is applicable. All records shall be made available to AQMD staff upon request and be maintained for at least:
 - a. Three years after each APEP report is submitted to AQMD for a facility not subject to Title V, unless a different time period is required in Rule 2011 or Rule 2012 [2011 & 2012]; or
 - b. Five years after each APEP report is submitted to AQMD for a facility subject to Title V. [3004(a)(4)(E)]
 - c. Notwithstanding the above, all data gathered or computed for intervals of less than 15 minutes shall only be maintained a minimum of 48 hours. [2011 & 2012]
2. The operator shall store on site and make available to the Executive Officer upon request: records used to determine emissions, maintenance records, sources test reports, relative accuracy test audit reports, relative accuracy audit reports and fuel meter calibration records. [2011 & 2012]

II. Reporting Requirements for all RECLAIM Sources

1. The operator shall submit a quarterly certification of emissions including the facility's total NO_x or SO_x emissions, whichever is applicable, for the quarter within 30 days after the end of the first three quarters and 60 days after the end of the fourth quarter of a compliance year. [2011 & 2012]

NO_x Reporting Requirements

- A. The Operator of a NO_x Major Source, as defined in Rule 2012, shall, as applicable:
Not Applicable

**FACILITY PERMIT TO OPERATE
SAPA EXTRUDER, INC**

**SECTION G: RECORDKEEPING AND REPORTING REQUIREMENTS FOR
RECLAIM SOURCES**

B. The Operator of a NOx Large Source, as defined in Rule 2012, shall:

Not Applicable

C. The Operator of a NOx Process Unit, as defined in Rule 2012, shall:

1. Electronically report the calculated quarterly NOx emissions for each NOx process unit. The Operator shall comply with this requirement within 12 months of the date of entry to the RECLAIM Program. [2012]

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: SECONDARY METALS, ALUMINUM					
System 2: ANNEALING					
FURNACE, BILLET PREHEAT, NATURAL GAS, ALUMINUM, GRANCO-CLARK, 5.08 MMBTU/HR WITH A/N: BURNER, NATURAL GAS, GRANCO-CLARK, 82 TOTAL; 0.06 MMBTU/HR BURNER, NATURAL GAS, GRANCO-CLARK, 4 TOTAL; 0.04 MMBTU/HR	D66		NOX: PROCESS UNIT**	CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; NOX: 50 PPMV NATURAL GAS (4) [RULE 2005, 5-6-2005]; NOX: 50 PPMV NATURAL GAS (3) [RULE 2012, 5-6-2005]; PM: (9) [RULE 404, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]	B59.1, D28.1, D28.3, L341.1

* (1) (1A) (1B) Denotes RECLAIM emission factor
 (3) Denotes RECLAIM concentration limit
 (5) (5A) (5B) Denotes command and control emission limit
 (7) Denotes NSR applicability limit
 (9) See App B for Emission Limits
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (4) Denotes BACT emission limit
 (6) Denotes air toxic control rule limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

**FACILITY PERMIT TO OPERATE
SAPA EXTRUDER, INC**

SECTION H: DEVICE ID INDEX

**The following sub-section provides an index
to the devices that make up the facility
description sorted by device ID.**

**FACILITY PERMIT TO OPERATE
SAPA EXTRUDER, INC**

SECTION H: DEVICE ID INDEX

Device Index For Section H			
Device ID	Section H Page No.	Process	System
D66	1	1	2

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

DEVICE CONDITIONS

B. Material/Fuel Type Limits

B59.1 The operator shall not use the following material(s) in this device :

Metal contaminated with rubber, plastic, paper, rags, oil, grease

Smoke producing material

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 401, 3-2-1984; RULE 401, 11-9-2001]

[Devices subject to this condition : D66]

D. Monitoring/Testing Requirements

D28.1 The operator shall conduct source test(s) in accordance with the following specifications:

The test shall be conducted to determine the NOX emissions at the outlet.

The test shall be conducted every five-year period, with the first five year-period ending June 30, 2010.

The test shall be conducted within 12 months of the approval of the concentration limit.

[RULE 2012, 5-6-2005]

[Devices subject to this condition : D66]

D28.3 The operator shall conduct source test(s) in accordance with the following specifications:

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

The test shall be conducted to simultaneously determine NO_x and CO, in ppmv at 3% oxygen, at the outlet.

The test shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up.

The District shall be notified of the date and time of the test at least 10 days prior to the test.

[RULE 2012, 5-6-2005]

[Devices subject to this condition : D66]

L. Expiration Date

L341.1 Within 90 days after start-up of this equipment, the following device(s) shall be removed from operation:

D10

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D66]

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

SECTION I: PLANS AND SCHEDULES

This section lists all plans approved by AQMD for the purposes of meeting the requirements of applicable AQMD rules.

NONE

NOTE: This section does not list compliance schedules pursuant to the requirements of Regulation XXX - Title V Permits; Rule 3004(a)(10)(C). For equipment subject to a variance, order for abatement, or alternative operating condition granted pursuant to Rule 518.2, equipment specific conditions are added to the equipment in Section D or H of the permit.

**FACILITY PERMIT TO OPERATE
SAPA EXTRUDER, INC**

SECTION J: AIR TOXICS

NOT APPLICABLE

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

SECTION K: TITLE V Administration

GENERAL PROVISIONS

1. This permit may be revised, revoked, reopened and reissued, or terminated for cause, or for failure to comply with regulatory requirements, permit terms, or conditions. [3004(a)(7)(C)]
2. This permit does not convey any property rights of any sort or any exclusive privilege. [3004(a)(7)(E)]

Permit Renewal and Expiration

3. (A) Except for solid waste incineration facilities subject to standards under section 129(e) of the Clean Air Act, this permit shall expire five years from the date that this Title V permit is issued. The operator's right to operate under this permit terminates at midnight on this date, unless the facility is protected by an application shield in accordance with Rule 3002(b), due to the filing of a timely and complete application for a Title V permit renewal, consistent with Rule 3003. [3004(a)(2), 3004(f)]

(B) A Title V permit for a solid waste incineration facility combusting municipal waste subject to standards under Section 129(e) of the Clean Air Act shall expire 12 years from the date of issuance unless such permit has been renewed pursuant to this regulation. These permits shall be reviewed by the Executive Officer at least every five years from the date of issuance. [3004(f)(2)]
4. To renew this permit, the operator shall submit to the Executive Officer an application for renewal at least 180 days, but not more than 545 days, prior to the expiration date of this permit. [3003(a)(6)]

Duty to Provide Information

5. The applicant for, or holder of, a Title V permit shall furnish, pursuant to Rule 3002(d) and (e), timely information and records to the Executive Officer or designee within a reasonable time as specified in writing by the Executive Officer or designee. [3004(a)(7)(F)]

Payment of Fees

6. The operator shall pay all required fees specified in Regulation III - Fees. [3004(a)(7)(G)]

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

SECTION K: TITLE V Administration

Reopening for Cause

7. The Executive Officer will reopen and revise this permit if any of the following circumstances occur:
- (A) Additional regulatory requirements become applicable with a remaining permit term of three or more years. Reopening is not required if the effective date of the requirement is later than the expiration date of this permit, unless the permit or any of its terms and conditions has been extended pursuant to paragraph (f)(4) of Rule 3004.
 - (B) The Executive Officer or EPA Administrator determines that this permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit.
 - (C) The Executive Officer or EPA Administrator determines that the permit must be revised or revoked to assure compliance with the applicable requirements. [3005(g)(1)]

COMPLIANCE PROVISIONS

8. The operator shall comply with all regulatory requirements, and all permit terms and conditions, except:
- (A) As provided for by the emergency provisions of condition no. 17 or condition no. 18, or
 - (B) As provided by an alternative operating condition granted pursuant to a federally approved (SIP-approved) Rule 518.2.

Any non-compliance with any federally enforceable permit condition constitutes a violation of the Federal Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or revision; or denial of a permit renewal application. Non-compliance may also be grounds for civil or criminal penalties under the California State Health and Safety Code. [3004(a)(7)(A)]

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

SECTION K: TITLE V Administration

9. The operator shall allow the Executive Officer or authorized representative, upon presentation of appropriate credentials to:
 - (A) Enter the operator's premises where emission-related activities are conducted, or records are kept under the conditions of this permit;
 - (B) Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;
 - (C) Inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
 - (D) Sample or monitor at reasonable times, substances or parameters for the purpose of assuring compliance with the facility permit or regulatory requirements. [3004(a)(10)(B)]

10. All terms and conditions in this permit, including any provisions designed to limit a facility's potential to emit, are enforceable by the EPA Administrator and citizens under the federal Clean Air Act, unless the term or condition is designated as not federally enforceable. Each day during any portion of which a violation occurs is a separate offense. [3004(g)]

11. A challenge to any permit condition or requirement raised by EPA, the operator, or any other person, shall not invalidate or otherwise affect the remaining portions of this permit. [3007(b)]

12. The filing of any application for a permit revision, revocation, or termination, or a notification of planned changes or anticipated non-compliance does not stay any permit condition. [3004(a)(7)(D)]

13. It shall not be a defense for a person in an enforcement action, including those listed in Rule 3002(c)(2), that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit, except as provided for in "Emergency Provisions" of this section. [3004(a)(7)(H)]

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

SECTION K: TITLE V Administration

14. The operator shall not build, erect, install, or use any equipment, the use of which, without resulting in a reduction in the total release of air contaminants to atmosphere, reduces or conceals an emission which would otherwise constitute a violation of Chapter 3 (commencing with Section 41700) of Part 4, of Division 26 of the California Health and Safety Code or of AQMD rules. This rule shall not apply to cases in which the only violation involved is of Section 41700 of the California Health and Safety Code, or Rule 402 of AQMD Rules. [408]
15. Nothing in this permit or in any permit shield can alter or affect:
- (A) Under Section 303 of the federal Clean Air Act, the provisions for emergency orders;
 - (B) The liability of the operator for any violation of applicable requirements prior to or at the time of permit issuance;
 - (C) The applicable requirements of the Acid Rain Program, Regulation XXXI;
 - (D) The ability of EPA to obtain information from the operator pursuant to Section 114 of the federal Clean Air Act;
 - (E) The applicability of state or local requirements that are not "applicable requirements", as defined in Rule 3000, at the time of permit issuance but which do apply to the facility, such as toxics requirements unique to the State; and
 - (F) The applicability of regulatory requirements with compliance dates after the permit issuance date. [3004(c)(3)]
16. For any portable equipment that requires an AQMD or state permit or registration, excluding a) portable engines, b) military tactical support equipment and c) AQMD-permitted portable equipment that are not a major source, are not located at the facility for more than 12 consecutive months after commencing operation, and whose operation does not conflict with the terms or conditions of this Title V permit: 1) the facility operator shall keep a copy of the AQMD or state permit or registration; 2) the equipment operator shall comply with the conditions on the permit or registration and all other regulatory requirements; and 3) the facility operator shall treat the permit or registration as a part of its Title V permit, subject to recordkeeping, reporting and certification requirements. [3004(a)(1)]

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

SECTION K: TITLE V Administration EMERGENCY PROVISIONS

17. An emergency¹ constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limit only if:
- (A) Properly signed, contemporaneous operating records or other credible evidence demonstrate that:
 - (1) An emergency occurred and the operator can identify the cause(s) of the emergency;
 - (2) The facility was operated properly (i.e. operated and maintained in accordance with the manufacturer's specifications, and in compliance with all regulatory requirements or a compliance plan), before the emergency occurred;
 - (3) The operator took all reasonable steps to minimize levels of emissions that exceeded emissions standard, or other requirements in the permit; and,
 - (4) The operator submitted a written notice of the emergency to the AQMD within two working days of the time when the emissions limitations were exceeded due to the emergency. The notice shall contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken; and
 - (B) The operator complies with the breakdown provisions of Rule 430 – Breakdown Provisions, or subdivision (i) of Rule 2004 – Requirements, whichever is applicable. [3002(g), 430, 2004(i)]
18. The operator is excused from complying with any regulatory requirement that is suspended by the Executive Officer during a state of emergency or state of war emergency, in accordance with Rule 118 - Emergencies. [118]

¹ "Emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the operator, including acts of God, which: (A) requires immediate corrective action to restore normal operation; and (B) causes the facility to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency; and (C) is not caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

SECTION K: TITLE V Administration RECORDKEEPING PROVISIONS

19. In addition to any other recordkeeping requirements specified elsewhere in this permit, the operator shall keep records of required monitoring information, where applicable, that include:
- (A) The date, place as defined in the Title V permit, and time of sampling or measurements;
 - (B) The date(s) analyses were performed;
 - (C) The company or entity that performed the analyses;
 - (D) The analytical techniques or methods used;
 - (E) The results of such analyses; and
 - (F) The operating conditions as existing at the time of sampling or measurement. [3004(a)(4)(B)]
20. The operator shall maintain records pursuant to Rule 109 and any applicable material safety data sheet (MSDS) for any equipment claimed to be exempt from a written permit by Rule 219 based on the information in those records. [219(t)]
21. The operator shall keep all records of monitoring data required by this permit or by regulatory requirements for a period of at least five years from the date of the monitoring sample, measurement, report, or application. [3004(a)(4)(E)]

REPORTING PROVISIONS

22. The operator shall comply with the following requirements for prompt reporting of deviations:
- (A) Breakdowns shall be reported as required by Rule 430 – Breakdown Provisions or subdivision (i) of Rule 2004 - Requirements, whichever is applicable.

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

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- (B) Other deviations from permit or applicable rule emission limitations, equipment operating conditions, or work practice standards, determined by observation or by any monitoring or testing required by the permit or applicable rules that result in emissions greater than those allowed by the permit or applicable rules shall be reported within 72 hours (unless a shorter reporting period is specified in an applicable State or Federal Regulation) of discovery of the deviation by contacting AQMD enforcement personnel assigned to this facility or otherwise calling (800) CUT-SMOG.
 - (C) A written report of such deviations reported pursuant to (B), and any corrective actions or preventative measures taken, shall be submitted to AQMD, in an AQMD approved format, within 14 days of discovery of the deviation.
 - (D) All other deviations shall be reported with the monitoring report required by condition no. 23. [3004(a)(5)]
23. Unless more frequent reporting of monitoring results are specified in other permit conditions or in regulatory requirements, the operator shall submit reports of any required monitoring to the AQMD at least twice per year. The report shall include a) a statement whether all monitoring required by the permit was conducted; and b) identification of all instances of deviations from permit or regulatory requirements. A report for the first six calendar months of the year is due by August 31 and a report for the last six calendar months of the year is due by February 28. [3004(a)(4)(F)]
24. The operator shall submit to the Executive Officer and to the Environmental Protection Agency (EPA), an annual compliance certification. For RECLAIM facilities, the certification is due when the Annual Permit Emissions Program (APEP) report is due and shall cover the same reporting period. For other facilities, the certification is due on March 1 for the previous calendar year. The certification need not include the period preceding the date the initial Title V permit was issued. Each compliance certification shall include:
- (A) Identification of each permit term or condition that is the basis of the certification;

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- (B) The compliance status during the reporting period;
- (C) Whether compliance was continuous or intermittent;
- (D) The method(s) used to determine compliance over the reporting period and currently, and
- (E) Any other facts specifically required by the Executive Officer to determine compliance.

The EPA copy of the certification shall be sent to: Director of the Air Division Attn:
Air-3 USEPA, Region IX 75 Hawthorne St. San Francisco, CA 94105 [3004(a)(10)(E)]

25. All records, reports, and documents required to be submitted by a Title V operator to AQMD or EPA shall contain a certification of accuracy consistent with Rule 3003(c)(7) by a responsible official (as defined in Rule 3000). [3004(a)(12)]

PERIODIC MONITORING

26. All periodic monitoring required by this permit pursuant to Rule 3004(a)(4)(c) is based on the requirements and justifications in the AQMD document "Periodic Monitoring Guidelines for Title V Facilities" or in case-by-case determinations documented in the TitleV application file. [3004(a)(4)]

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

SECTION K: TITLE V Administration

FACILITY RULES

This facility is subject to the following rules and regulations

With the exception of Rule 402, 473, 477, 1118 and Rules 1401 through 1420, the following rules that are designated as non-federally enforceable are pending EPA approval as part of the state implementation plan. Upon the effective date of that approval, the approved rule(s) will become federally enforceable, and any earlier versions of those rules will no longer be federally enforceable.

RULE SOURCE	Adopted/Amended Date	FEDERAL Enforceability
RULE 109	5-2-2003	Federally enforceable
RULE 1113	11-8-1996	Federally enforceable
RULE 1113	7-13-2007	Non federally enforceable
RULE 1140	2-1-1980	Federally enforceable
RULE 1140	8-2-1985	Non federally enforceable
RULE 1171	11-7-2003	Federally enforceable
RULE 1171	5-1-2009	Non federally enforceable
RULE 118	12-7-1995	Non federally enforceable
RULE 1303(a)(1)-BACT	12-6-2002	Non federally enforceable
RULE 1303(a)(1)-BACT	5-10-1996	Federally enforceable
RULE 1303(b)(2)-Offset	12-6-2002	Non federally enforceable
RULE 1303(b)(2)-Offset	5-10-1996	Federally enforceable
RULE 1415	10-14-1994	Non federally enforceable
RULE 2005	5-6-2005	Federally enforceable
RULE 2012	5-6-2005	Federally enforceable
RULE 204	10-8-1993	Federally enforceable
RULE 217	1-5-1990	Federally enforceable
RULE 219	6-1-2007	Non federally enforceable
RULE 219	9-4-1981	Federally enforceable
RULE 2202	2-6-2004	Non federally enforceable
RULE 3002	11-14-1997	Federally enforceable
RULE 3003	11-14-1997	Federally enforceable

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RULE SOURCE	Adopted/Amended Date	FEDERAL Enforceability
RULE 3003	3-16-2001	Non federally enforceable
RULE 3004(a)(4)-Periodic Monitoring	12-12-1997	Federally enforceable
RULE 3005	11-14-1997	Federally enforceable
RULE 3005	3-16-2001	Non federally enforceable
RULE 3007	10-8-1993	Federally enforceable
RULE 304	6-5-2009	Non federally enforceable
RULE 401	11-9-2001	Non federally enforceable
RULE 401	3-2-1984	Federally enforceable
RULE 402	5-7-1976	Non federally enforceable
RULE 404	2-7-1986	Federally enforceable
RULE 405	2-7-1986	Federally enforceable
RULE 407	4-2-1982	Federally enforceable
RULE 408	5-7-1976	Federally enforceable
RULE 409	8-7-1981	Federally enforceable
RULE 430	7-12-1996	Non federally enforceable
RULE 481	1-11-2002	Federally enforceable
RULE 701	6-13-1997	Federally enforceable

**FACILITY PERMIT TO OPERATE
SAPA EXTRUDER, INC**

**APPENDIX A: NOX AND SOX EMITTING EQUIPMENT EXEMPT FROM WRITTEN
PERMIT PURSUANT TO RULE 219**

1. AGING OVEN, NATURAL GAS
2. DIE PRE-HEATER, NATURAL GAS
3. DUMMY BLOCK PRE-HEATER, NATURAL GAS
4. HOT WATER HEATERS, NATURAL GAS
5. SPACE HEATER, NATURAL GAS
6. TOOL CLEANER HEATER, NATURAL GAS

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

APPENDIX B: RULE EMISSION LIMITS [RULE 1113 11-08-1996]

- (1) Except as provided in paragraphs (c)(2), (c)(3), and (c)(4) of Rule 1113, the operator shall not supply, sell, offer for sale, apply, or solicit the application of, any architectural coating which, at the time of sale or manufacture, contains more than 250 grams of VOC per liter of coating (2.08 pounds per gallon), less water, less exempt compounds, and less any colorant added to tint bases, or manufacture, blend, or repackage such a coating for use within the District.
- (2) Except as provided in paragraphs (c)(3) and (c)(4) of Rule 1113, the operator shall not supply, sell, offer for sale, apply, solicit the application of, manufacture, blend, or repackage, for use within the District, any architectural coating listed in the Table of Standards which contains VOC (excluding any colorant added to tint bases) in excess of the corresponding VOC limit specified in the table, after the effective date specified.

TABLE OF STANDARDS

VOC LIMITS

Grams of VOC Per Liter of Coating, Less Water And Less Exempt Compounds

COATING	Limit*	Effective Date of Adoption	Effective 1/1/1998	Effective 1/1/1999	Effective 7/1/2001	Effective 1/1/2005	Effective 7/1/2008
Bond Breakers	350						
Clear Wood Finishes							
Varnish	350						
Sanding Sealers	350						
Lacquer	680		550			275	
Concrete-Curing Compounds	350						
Dry-Fog Coatings	400						
Fire-proofing Exterior Coatings	350	450		350			
Fire-Retardant Coatings							
Clear	650						
Pigmented	350						
Flats	250						
Graphic Arts (Sign) Coatings	500				100		50

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

APPENDIX B: RULE EMISSION LIMITS [RULE 1113 11-08-1996]

Industrial Maintenance Primers and Topcoats						
Alkyds	420					
Catalyzed Epoxy	420					
Bituminous Coatings	420					
Materials						
Inorganic Polymers	420					
Vinyl Chloride Polymers	420					
Chlorinated Rubber	420					
Acrylic Polymers	420					
Urethane Polymers	420					
Silicones	420					
Unique Vehicles	420					
Japans/Faux Finishing Coatings	350	700		350		
Magnesite Cement Coatings	600			450		
Mastic Coatings	300					
Metallic Pigmented Coatings	500					
Multi-Color Coatings	420		250			
Pigmented Lacquer	680		550		275	
Pre-Treatment Wash Primers	780					
Primers, Sealers, and Undercoaters	350					
Quick-Dry Enamels	400					
Roof Coatings	300					
Shellac						
Clear	730					
Pigmented	550					
Stains	350					
Swimming Pool Coatings						
Repair	650					
Other	340					
Traffic Coatings	250		150			
Waterproofing Sealers	400					
Wood Preservatives						
Below-Ground	350					
Other	350					

* The specified limits remain in effect unless revised limits are listed in subsequent columns in the Table of Standards

TABLE OF STANDARDS (cont.)

VOC LIMITS

Grams of VOC Per Liter of Material

COATING	Limit
Low-Solids Coating	120

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

APPENDIX B: RULE EMISSION LIMITS [RULE 1113 07-13-2007]

- (1) Except as provided in paragraphs (c)(2), (c)(3), (c)(4), and specified coatings averaged under (c)(6), no person shall supply, sell, offer for sale, manufacture, blend, or repackage any architectural coating for use in the District which, at the time of sale or manufacture, contains more than 250 grams of VOC per liter of coating (2.08 pounds per gallon), less water, less exempt compounds, and less any colorant added to tint bases, and no person shall apply or solicit the application of any architectural coating within the District that exceeds 250 grams of VOC per liter of coating as calculated in this paragraph.

- (2) Except as provided in paragraphs (c)(3), (c)(4), and designated coatings averaged under (c)(6), no person shall supply, sell, offer for sale, manufacture, blend, or repackage, for use within the District, any architectural coating listed in the Table of Standards which contains VOC (excluding any colorant added to tint bases) in excess of the corresponding VOC limit specified in the table, after the effective date specified, and no person shall apply or solicit the application of any architectural coating within the District that exceeds the VOC limit as specified in this paragraph. No person shall apply or solicit the application within the District of any industrial maintenance coatings, except anti-graffiti coatings, for residential use or for use in areas such as office space and meeting rooms of industrial, commercial or institutional facilities not exposed to such extreme environmental conditions described in the definition of industrial maintenance coatings; or of any rust-preventative coating for industrial use, unless such a rust preventative coating complies with the Industrial Maintenance Coating VOC limit specified in the Table of Standards.

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

APPENDIX B: RULE EMISSION LIMITS [RULE 1113 07-13-2007] TABLE OF STANDARDS VOC LIMITS

**Grams of VOC Per Liter of Coating,
Less Water and Less Exempt Compounds**

COATING CATEGORY	Ceiling Limit*	Current Limit	Effective Date					
			1/1/03	1/1/04	1/1/05	7/1/06	7/1/07	7/1/08
Bond Breakers	350							
Clear Wood Finishes	350					275		
Varnish	350					275		
Sanding Sealers	350					275		
Lacquer	680	550			275			
Clear Brushing Lacquer	680				275			
Concrete-Curing Compounds	350						100	
Concrete-Curing Compounds For Roadways and Bridges**	350							
Dry-Fog Coatings	400						150	
Fire-Proofing Exterior Coatings	450	350						
Fire-Retardant Coatings***								
Clear	650							
Pigmented	350							
Flats	250	100						50
Floor Coatings	420		100			50		
Graphic Arts (Sign) Coatings	500							
Industrial Maintenance (IM) Coatings	420			250		100		
High Temperature IM Coatings			420					
Zinc-Rich IM Primers	420		340			100		
Japans/Faux Finishing Coatings	700	350						
Magnesite Cement Coatings	600	450						
Mastic Coatings	300							
Metallic Pigmented Coatings	500							
Multi-Color Coatings	420	250						
Nonflat Coatings	250		150			50		

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

APPENDIX B: RULE EMISSION LIMITS [RULE 1113 07-13-2007]

COATING CATEGORY	Ceiling Limit*	Current Limit	Effective Date					
			1/1/03	1/1/04	1/1/05	7/1/06	7/1/07	7/1/08
Nonflat High Gloss	250		150				50	
Pigmented Lacquer	680	550			275			
Pre-Treatment Wash Primers	780		420					
Primers, Sealers, and Undercoaters	350		200			100		
Quick-Dry Enamels	400		250			150	50	
Quick-Dry Primers, Sealers, and Undercoaters	350		200			100		
Recycled Coatings			250					
Roof Coatings	300		250		50			
Roof Coatings, Aluminum	500				100			
Roof Primers, Bituminous	350		350					
Rust Preventative Coatings	420		400			100		
Shellac								
Clear	730							
Pigmented	550							
Specialty Primers	350					250	100	
Stains	350		250				100	
Stains, Interior	250							
Swimming Pool Coatings								
Repair	650		340					
Other	340							
Traffic Coatings	250	150					100	
Waterproofing Sealers	400		250			100		
Waterproofing Concrete/Masonry Sealers	400					100		
Wood Preservatives								
Below-Ground	350							
Other	350							

* The specified limits remain in effect unless revised limits are listed in subsequent columns in the Table of Standards.

** Does not include compounds used for curbs and gutters, sidewalks, islands, driveways and other miscellaneous concrete areas.

*** The Fire-Retardant Coating category will be eliminated on January 1, 2007 and subsumed by the coating category for which they are formulated.

**FACILITY PERMIT TO OPERATE
SAPA EXTRUDER, INC**

**APPENDIX B: RULE EMISSION LIMITS
[RULE 1113 07-13-2007]**

**TABLE OF STANDARDS (cont.)
VOC LIMITS**

Grams of VOC Per Liter of Material

COATING	Limit
Low-Solids Coating	120

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

APPENDIX B: RULE EMISSION LIMITS [RULE 1140 02-01-1980]

- (1) The operator shall not, if he complies with an applicable performance standard in section (b)(4) of Rule 1140, discharge into the atmosphere from any abrasive blasting any air contaminant for a period or periods aggregating more than three minutes in any one hour which is:
 - (A) As dark or darker in shade as that designated as No. 2 on the Ringelmann Chart, as published by the United States Bureau of Mines, or
 - (B) Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in (1)(A).
- (2) The operator shall not, if he is not complying with an applicable performance standard in section (b)(4) of Rule 1140, discharge into the atmosphere from any abrasive blasting any air contaminant for a period or periods aggregating more than three minutes in any one hour which is:
 - (A) As dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines, or
 - (B) Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in (2)(A).

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

APPENDIX B: RULE EMISSION LIMITS [RULE 1140 08-02-1985]

- (1) The operator shall not, if he complies with an applicable performance standard in section (b)(4) of Rule 1140, discharge into the atmosphere from any abrasive blasting any air contaminant for a period or periods aggregating more than three minutes in any one hour which is:
 - (A) As dark or darker in shade as that designated as No. 2 on the Ringelmann Chart, as published by the United States Bureau of Mines, or
 - (B) Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in (1)(A).
- (2) The operator shall not, if he is not complying with an applicable performance standard in section (b)(4) of Rule 1140, discharge into the atmosphere from any abrasive blasting any air contaminant for a period or periods aggregating more than three minutes in any one hour which is:
 - (A) As dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines, or
 - (B) Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in (2)(A).

**FACILITY PERMIT TO OPERATE
 SAPA EXTRUDER, INC**

**APPENDIX B: RULE EMISSION LIMITS
 [RULE 1171 11-07-2003]**

(1) Solvent Requirements

A person shall not use a solvent to perform solvent cleaning operations unless the solvent complies with the applicable requirements set forth below:

SOLVENT CLEANING ACTIVITY	CURRENT LIMITS
	VOC g/l (lb/gal)
(A) Product Cleaning During Manufacturing Process Or Surface Preparation For Coating, Adhesive, Or Ink Application	
(i) General	25 (0.21)
(ii) Electrical Apparatus Components & Electronic Components	500 (4.2)
(iii) Medical Devices & Pharmaceuticals	800 (6.7)
(B) Repair and Maintenance Cleaning	
(i) General	25 (0.21)
(ii) Electrical Apparatus Components & Electronic Components	900 (7.5)

**FACILITY PERMIT TO OPERATE
 SAPA EXTRUDER, INC**

**APPENDIX B: RULE EMISSION LIMITS
 [RULE 1171 11-07-2003]**

SOLVENT CLEANING ACTIVITY	CURRENT LIMITS
	VOC g/l (lb/gal)
(iii) Medical Devices & Pharmaceuticals	
(A) Tools, Equipment, & Machinery	800 (6.7)
(B) General Work Surfaces	600 (5.0)
(C) Cleaning of Coatings or Adhesives Application Equipment	550 (4.6)
(D) Cleaning of Ink Application Equipment	
(i) General	25 (0.21)
(ii) Flexographic Printing	25 (0.21)
(iii) Gravure Printing	
(A) Publication	750 (6.3)
(B) Packaging	25 (0.21)
(iv) Lithographic or Letter Press Printing	

**FACILITY PERMIT TO OPERATE
 SAPA EXTRUDER, INC**

**APPENDIX B: RULE EMISSION LIMITS
 [RULE 1171 11-07-2003]**

SOLVENT CLEANING ACTIVITY	CURRENT LIMITS
	VOC g/l (lb/gal)
(A) Roller Wash – Step 1	600 (5.0)
(B) Roller Wash-Step 2, Blanket Wash, & On-Press Components	800 (6.7)
(C) Removable Press Components	25 (0.21)
(v) Screen Printing	750 (6.3)
(vi) Ultraviolet Ink/ Electron Beam Ink Application Equipment (except screen printing)	800 (6.7)
(vii) Specialty Flexographic Printing	600 (5.0)
(E) Cleaning of Polyester Resin Application Equipment	25 (0.21)

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

APPENDIX B: RULE EMISSION LIMITS [RULE 1171 05-01-2009]

(1) Solvent Requirements

A person shall not use a solvent to perform solvent cleaning operations unless the solvent complies with the applicable requirements set forth below:

	CURRENT LIMITS*	EFFECTIVE 1/1/2010
SOLVENT CLEANING ACTIVITY	VOC g/l (lb/gal)	VOC g/l (lb/gal)
(A) Product Cleaning During Manufacturing Process Or Surface Preparation For Coating, Adhesive, Or Ink Application		
(i) General	25 (0.21)	
(ii) Electrical Apparatus Components & Electronic Components	100 (0.83)	
(iii) Medical Devices & Pharmaceuticals	800 (6.7)	
(B) Repair and Maintenance Cleaning		
(i) General	25 (0.21)	
(ii) Electrical Apparatus Components & Electronic Components	100 (0.83)	

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

APPENDIX B: RULE EMISSION LIMITS [RULE 1171 05-01-2009]

	CURRENT LIMITS*	EFFECTIVE 1/1/2010
SOLVENT CLEANING ACTIVITY (cont.)	VOC g/l (lb/gal)	VOC g/l (lb/gal)
(iii) Medical Devices & Pharmaceuticals		
(A) Tools, Equipment, & Machinery	800 (6.7)	
(B) General Work Surfaces	600 (5.0)	
(C) Cleaning of Coatings or Adhesives Application Equipment	25 (0.21)	
(D) Cleaning of Ink Application Equipment		
(i) General	25 (0.21)	
(ii) Flexographic Printing	25 (0.21)	
(iii) Gravure Printing		
(A) Publication	100 (0.83)	
(B) Packaging	25 (0.21)	
(iv) Lithographic (Offset) or Letter Press Printing		
(A) Roller Wash, Blanket Wash, & On-Press Components	100 (0.83)	

**FACILITY PERMIT TO OPERATE
 SAPA EXTRUDER, INC**

**APPENDIX B: RULE EMISSION LIMITS
 [RULE 1171 05-01-2009]**

	CURRENT LIMITS*	EFFECTIVE 1/1/2010
SOLVENT CLEANING ACTIVITY (cont.)	VOC g/l (lb/gal)	VOC g/l (lb/gal)
(B) Removable Press Components	25 (0.21)	
(v) Screen Printing	100 (0.83)	
(vi) Ultraviolet Ink/ Electron Beam Ink Application Equipment (except screen printing)	650 (5.4)	100 (0.83)
(vii) Specialty Flexographic Printing	100 (0.83)	
(E) Cleaning of Polyester Resin Application Equipment	25 (0.21)	

* The specified limits remain in effect unless revised limits are listed in subsequent columns.

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

APPENDIX B: RULE EMISSION LIMITS [RULE 404 02-07-1986]

The operator shall not discharge into the atmosphere from this equipment, particulate matter in excess of the concentration at standard conditions, shown in Table 404(a).

Where the volume discharged is between figures listed in the Table, the exact concentration permitted to be discharged shall be determined by linear interpolation.

For the purposes of this rule, emissions shall be averaged over one complete cycle of operation or one hour, whichever is the lesser time period.

TABLE 404(a)

Volume Discharged Calculated as Dry Gas At Standard Conditions		Maximum Concentration of Particulate Matter Allowed in Discharged Gas Calculated as Dry Gas at Standard Conditions		Volume Discharged Calculated as Dry Gas At Standard Conditions		Maximum Concentration of Particulate Matter Allowed in Discharged Gas Calculated as Dry Gas at Standard Conditions	
		Milligrams per Cubic Meter	Grains per Cubic Foot			Milligrams per Cubic Meter	Grains per Cubic Foot
25 or less	883 or less	450	0.196	900	31780	118	0.0515
30	1059	420	.183	1000	35310	113	.0493
35	1236	397	.173	1100	38850	109	.0476
40	1413	377	.165	1200	42380	106	.0463
45	1589	361	.158	1300	45910	102	.0445

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

APPENDIX B: RULE EMISSION LIMITS [RULE 404 02-07-1986]

Volume Discharged Calculated as Dry Gas At Standard Conditions		Maximum Concentration of Particulate Matter" Allowed in Discharged Gas Calculated as Dry Gas at Standard Conditions		Volume Discharged Calculated as Dry Gas At Standard Conditions		Maximum Concentration of Particulate Matter Allowed in Discharged Gas Calculated as Dry Gas at Standard Conditions	
		Milligrams per Cubic Meter	Grains per Cubic Foot			Milligrams per Cubic Meter	Grains per Cubic Foot
Cubic meters Per Minute	Cubic feet Per Minute			Cubic meters Per Minute	Cubic feet Per Minute		
50	1766	347	.152	1400	49440	100	.0437
60	2119	324	.141	1500	52970	97	.0424
70	2472	306	.134	1750	61800	92	.0402
80	2825	291	.127	2000	70630	87	.0380
90	3178	279	.122	2250	79460	83	.0362
100	3531	267	.117	2500	88290	80	.0349
125	4414	246	.107	3000	105900	75	.0327
150	5297	230	.100	4000	141300	67	.0293
175	6180	217	.0947	5000	176600	62	.0271
200	7063	206	.0900	6000	211900	58	.0253
250	8829	190	.0830	8000	282500	52	.0227
300	10590	177	.0773	10000	353100	48	.0210
350	12360	167	.0730	15000	529700	41	.0179
400	14130	159	.0694	20000	706300	37	.0162
450	15890	152	.0664	25000	882900	34	.0148

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

APPENDIX B: RULE EMISSION LIMITS [RULE 404 02-07-1986]

Volume Discharged Calculated as Dry Gas At Standard Conditions		Maximum Concentration of Particulate Matter Allowed in Discharged Gas Calculated as Dry Gas at Standard Conditions		Volume Discharged Calculated as Dry Gas At Standard Conditions		Maximum Concentration of Particulate Matter Allowed in Discharged Gas Calculated as Dry Gas at Standard Conditions	
500	17660	146	.0637	30000	1059000	32	.0140
600	21190	137	.0598	40000	1413000	28	.0122
700	24720	129	.0563	50000	1766000	26	.0114
800	28250	123	.0537	70000 or more	2472000 or more	23	.0100

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

APPENDIX B: RULE EMISSION LIMITS [RULE 405 02-07-1986]

The operator shall not discharge into the atmosphere from this equipment, solid particulate matter including lead and lead compounds in excess of the rate shown in Table 405(a).

Where the process weight per hour is between figures listed in the table, the exact weight of permitted discharge shall be determined by linear interpolation.

For the purposes of this rule, emissions shall be averaged over one complete cycle of operation or one hour, whichever is the lesser time period.

TABLE 405(a)

Process Weight Per Hour		Maximum Discharge Rate Allowed for Solid Particulate Matter (Aggregate Discharged From All Points of Process		Process Weight Per Hour		Maximum Discharge Rate Allowed for Solid Particulate Matter (Aggregate Discharged From All points of Process	
		Kilograms Per Hour	Pounds Per Hour			Kilograms Per Hour	Pounds Per Hour
100 or less	220 or less	0.450	0.99	9000	19840	5.308	11.7
150	331	0.585	1.29	10000	22050	5.440	12.0
200	441	0.703	1.55	12500	27560	5.732	12.6
250	551	0.804	1.77	15000	33070	5.982	13.2
300	661	0.897	1.98	17500	38580	6.202	13.7
350	772	0.983	2.17	20000	44090	6.399	14.1
400	882	1.063	2.34	25000	55120	6.743	14.9
450	992	1.138	2.51	30000	66140	7.037	15.5
500	1102	1.209	2.67	35000	77160	7.296	16.1
600	1323	1.340	2.95	40000	88180	7.527	16.6

FACILITY PERMIT TO OPERATE SAPA EXTRUDER, INC

APPENDIX B: RULE EMISSION LIMITS [RULE 405 02-07-1986]

Process Weight Per Hour		Maximum Discharge Rate Allowed for Solid Particulate Matter (Aggregate Discharged From All Points of Process		Process Weight Per Hour		Maximum Discharge Rate Allowed for Solid Particulate Matter (Aggregate Discharged From All points of Process	
		Kilograms Per Hour	Pounds Per Hour			Kilograms Per Hour	Pounds Per Hour
700	1543	1.461	3.22	45000	99210	7.738	17.1
800	1764	1.573	3.47	50000	110200	7.931	17.5
900	1984	1.678	3.70	60000	132300	8.277	18.2
1000	2205	1.777	3.92	70000	154300	8.582	18.9
1250	2756	2.003	4.42	80000	176400	8.854	19.5
1500	3307	2.206	4.86	90000	198400	9.102	20.1
1750	3858	2.392	5.27	100000	220500	9.329	20.6
2000	4409	2.563	5.65	125000	275600	9.830	21.7
2250	4960	2.723	6.00	150000	330700	10.26	22.6
2500	5512	2.874	6.34	175000	385800	10.64	23.5
2750	6063	3.016	6.65	200000	440900	10.97	24.2
3000	6614	3.151	6.95	225000	496000	11.28	24.9
3250	7165	3.280	7.23	250000	551200	11.56	25.5
3600	7716	3.404	7.50	275000	606300	11.82	26.1
4000	8818	3.637	8.02	300000	661400	12.07	26.6
4500	9921	3.855	8.50	325000	716500	12.30	27.1
5000	11020	4.059	8.95	350000	771600	12.51	27.6
6000	13230	4.434	9.78	400000	881800	12.91	28.5
7000	15430	4.775	10.5	450000	992100	13.27	29.3
8000	17640	5.089	11.2	500000 or more	1102000 or more	13.60	30.0

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT Title V Permit Summary

AQMD Facility ID: 161300	Company Name: SAPA EXTRUDER, INC.		
Equipment Location: 18111 E. RAILROAD ST., CITY OF INDUSTRY, CA 91748			SIC Code: 3341
Permit Revision #: 0	Revision Date:	Facility Permit Section(s) Affected:	
Application #(s): 504787	Application Submittal Date(s): 12-22-09		
AQMD Contact Person: Kien Huynh	Phone #: (909) 396-2635	E-Mail Address: khuynh@aqmd.gov	
Project Description: This is an existing facility that produces extruded aluminum products applying for a Title V Renewal permit. It is operating three billet preheat furnaces, five aging furnaces, one wet scrubber and one abrasive blasting cabinet.			
Permit Type: <input type="checkbox"/> Initial Title V Permit <input type="checkbox"/> Significant Revision <input checked="" type="checkbox"/> Permit Renewal			
Permit Features: <input type="checkbox"/> Federally Enforceable Emission Cap For Exemption From Certain NESHAP Requirements <input type="checkbox"/> Permit Shield Applies <input checked="" type="checkbox"/> Permit Contains Conditions Allowing Emission Trading <input type="checkbox"/> Alternative Operating Scenario <input type="checkbox"/> Permit Streamlines Overlapping or Outdated Requirements <input type="checkbox"/> Other: _____ <input type="checkbox"/> Source Out of Compliance With Applicable Requirements and/or Operating Under a Variance			
Toxic Air Contaminant Emissions (TAC) - Annual Reported Emissions for Reporting Year: 09-10	<input type="checkbox"/> No TACs Reported <input checked="" type="checkbox"/> The Following TACs Were Reported: See Table 1		Emissions (lbs/yr):
Health Risk From Toxic Air Contaminants:	<input type="checkbox"/> Health Risk Reduction Plan in Force (AQMD Rule 1402) (date): _____ <input type="checkbox"/> Health Risk Assessment Required for this Permit Action (AQMD Rule 1401) <input checked="" type="checkbox"/> Facility is Subject to Review by the Air Toxics Information and Assessment Act (AB2588) <input type="checkbox"/> Facility Determined to be Exempt from AB2588 Requirements <input type="checkbox"/> AQMD is Tracking Status of Facility under AB2588 <input type="checkbox"/> Health Risk Assessment Submitted to AQMD and Is Being Reviewed <input checked="" type="checkbox"/> Final Facility Health Risk Approved (date) 1999 Cancer Risk = 1.27 Acute Hazard Index = 0 Chronic Hazard Index = 0.03		
Criteria Pollutant Emissions Annual Reported Emissions (tons/year) for Reporting Year: 08-09	<input checked="" type="checkbox"/> NOx 11.292	<input checked="" type="checkbox"/> PM 9.471	
	<input checked="" type="checkbox"/> CO 3.040	<input checked="" type="checkbox"/> SOx 0.264	
	<input checked="" type="checkbox"/> VOC 2.908	<input type="checkbox"/> Other: _____	
Compliance History: <input type="checkbox"/> Citizen Complaints Filed in Last Two Calendar Years (#) <input checked="" type="checkbox"/> Notices to Comply Issued in Last Two Calendar Years (# 1) <input type="checkbox"/> Notices of Violation Issued in Last Two Calendar Years (#)			
Comments: The notice was issued to the previous owner, Indalex West, Inc. All issues associated with the notice were resolved. The facility is currently operating in compliance with all applicable rules and regulations.			

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

Title V Permit Summary

Table 1

TOXIC AIR CONTAMINANT EMISSIONS (TAC)

Sapa Extruder, Inc. ID 161300

2008 - 2009 Reporting Year

TAC Names	Emissions, lbs/yr
Ammonia	3127.08
Benzene	1.188
Beryllium	1.273
Cadmium	1.273
Formaldehyde	2.522
Lead compounds (inorganic)	6.369
Naphthalene [PAH, POM]	0.052
Nickel	3.821
PAHs, total, w/o individ. components reported [PAH, POM]	0.017

South Coast Air Quality Management District

Statement of Basis

Proposed Title V Renewal Permit

Facility Name:	Sapa Extruder, Inc.
Facility ID:	161300
SIC Code:	3341
Equipment Location:	18111 E. Railroad St. City of Industry, CA 91748
Application No.:	504787
Application Submittal Date:	12-22-09
AQMD Contact Person:	Kien Huynh, Air Quality Engineer II
Phone Number:	(909) 396-2635
E-Mail Address:	khuynh@aqmd.gov

1. Introduction and Scope of Permit

Title V is a national operating permit program for air pollution sources. Facilities subject to Title V must obtain a Title V permit and comply with specific Title V procedures to modify the permit. This permit replaces the facility's other existing permits. Title V does not necessarily include any new requirements for reducing emissions. It does, however, include new permitting, noticing, recordkeeping, and reporting requirements.

Pursuant to Title V of the federal Clean Air Act and AQMD Rule 3004(f), a Title V permit shall expire five years from the date of issuance unless such permit has been renewed. Accordingly, each facility is required to submit a Title V renewal application and request the AQMD to renew their Title V permit. The proposed permit incorporates updates to the facility information provided in the facility's Title V renewal application and all rules and regulations that are currently applicable to the facility.

The AQMD implements Title V through Regulation XXX – Title V Permits, adopted by the AQMD Governing Board in order to comply with EPA's requirement that local air permitting authorities develop a Title V program. Regulation XXX was developed with the participation of the public and affected facilities through a series of public workshops, working group meetings, public hearings and other meetings.

The Title V major source threshold for a particular pollutant depends on the attainment status of the pollutant. CO, NO₂, SO₂, and lead are in attainment with federal standards. The status for PM-10 is serious nonattainment. The status for ozone is currently extreme nonattainment.

A Title V permit is proposed to be issued to cover the operations of Sapa Extruder, Inc. located at 18111 E. Railroad Street, City of Industry. This facility is subject to Title V requirements because it is a major source.

2. Facility Description

This is an existing facility that produces extruded aluminum products applying for a Title V Renewal permit. It is operating three billet preheat furnaces, five aging furnaces, one wet scrubber and one abrasive blasting cabinet.

3. Construction and Permitting History

The facility has been in constant operation with a Title V permit at this location since 2000. Numerous permits to construct and permits to operate have been issued to the facility since August 1989. An initial Title V permit was issued on July 1, 2000 and a Title V renewal permit was issued on July 1, 2005 to Indalex West, Inc. (ID 123087). Several permit revisions were issued to this facility since 2000 and in 2009 there was a change of ownership from Indalex West Inc. to the current owner, Sapa Extruder, Inc.

4. Regulatory Applicability Determinations

Applicable legal requirements for which this facility is required to comply are required to be identified in the Title V permit (for example, Sections D, E, and H of the proposed Title V permit). Applicability determinations (i.e., determinations made by the District with respect to what legal requirements apply to a specific piece of equipment, process, or operation) can be found in the Engineering Evaluations. The facility is not subject to any NESHAP Requirements.

5. Monitoring and Operational Requirements

Applicable monitoring and operational requirements for which the facility is required to comply are identified in the Title V permit (for example, Sections D, F, and J and Appendix B of the proposed Title V permit). Discussion of any applicable operational requirements can be found in the Engineering Evaluations. All periodic monitoring requirements were developed using strict adherence to the following applicable guidance documents: SCAQMD Periodic Monitoring Guidelines for Title V Facilities (November 1997); CAPCOA/CARB/EPA Region IX Periodic Monitoring Recommendations for Generally Applicable Requirements in SIP (June 1999); and CAPCOA/CARB/EPA Region IX Recommended Periodic Monitoring for Generally Applicable Grain Loading Standards in the SIP: Combustion Sources (July 2001).

6. Permit Features

Permit Shield

A permit shield is an optional part of a Title V permit that gives the facility an explicit protection from requirements that do not apply to the facility. A permit shield is a provision in a permit that states that compliance with the conditions of the permit shall be deemed compliance with all

identified regulatory requirements. To incorporate a permit shield into the Title V permit involves submission of applications for change of conditions for each equipment affected by the permit shield. Permit shields are addressed in Rule 3004 (c). This facility has not applied for a permit shield.

Streamlining Requirements

Some emission units may be subject to multiple requirements which are closely related or redundant. The conditions may be streamlined to simplify the permit conditions and compliance. Emission limits, work practice standards, and monitoring, recordkeeping, and reporting requirements may be streamlined. Compliance with a streamlined condition will be deemed compliance with the underlying requirements whether or not the emission unit is actually in compliance with the specific underlying requirement. This facility has not applied for any streamlined conditions.

7. Summary of Emissions and Health Risks

**Criteria Pollutant Emissions (tons/year)
Annual Reported Emissions for Reporting Period 2008-2009**

Pollutants	Emissions (tons/year)
CO	3.04
NOx	11.292
VOC	2.908
SOx	0.264
PM	9.471

**Toxic Air Contaminants Emissions (TAC)
Annual Reported Emissions for Reporting Period 2008-2009**

The Following TACs Were Reported	Emissions, lbs/yr
Ammonia	3127.08
Benzene	1.188
Beryllium	1.273
Cadmium	1.273
Formaldehyde	2.522
Lead compounds (inorganic)	6.369
Naphthalene [PAH, POM]	0.052
Nickel	3.821
PAHs, total, w/o individ. components reported [PAH, POM]	0.017

Health Risk from Toxic Air Contaminants

The facility is subject to review by the Air Toxics Information and Assessment Act (AB2588). The Final Facility Health Risk was approved in 1999 with the following risk factors:

Cancer Risk	1.27 in one million
Acute Hazard Index	0
Chronic Hazard Index	0.03

8. Compliance History

As noted, the facility has been in constant operation with a Title V permit since 2000. The facility has been subject to both self-reporting requirements and AQMD inspections. The facility has had no citizen complaint filed in the last two years. Also, there has been no Notice of Violation issued to the company in the specified period. However, a Notice to Comply was issued to the previous owner, Indalex West, Inc. The notice required the facility to use the correct NOx emission factor to report NOx emissions for Device D1 (An aluminum melting furnace). The facility corrected the problem and operated in compliance with all applicable rules and regulations since then. Recently, Furnace D1 was removed from service.

9. Compliance Certification

By virtue of the Title V permit application and issuance of this permit, the reporting frequency for compliance certification for the facility shall be annual.



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

NOTICE OF PROPOSED TITLE V RENEWAL PERMIT

The South Coast Air Quality Management District (AQMD) is proposing to renew the existing Title V permit that was previously issued to the following facility:

SAPA EXTRUDER

18111 E. Railroad Street
City of Industry, CA 91748
Facility ID# 161300

Contact Person:

Patrick J. Meyer
Operations Manager
18111 E. Railroad Street
City of Industry, CA 91748

This is an existing facility, applying for a Title V permit renewal that is in the business of manufacturing aluminum extruded products. This facility is operating three billet preheat furnaces, five aging furnaces, one wet scrubber and one abrasive blasting cabinet.

Pursuant to Title V of the federal Clean Air Act and AQMD Rule 3004(f), a Title V permit shall expire five years from the date of issuance unless such permit has been renewed. Accordingly, the above facility has submitted a Title V renewal application and requested the AQMD to renew their Title V permit. The proposed permit incorporates updates to the facility information provided in the facility's Title V renewal application and all rules and regulations that are currently applicable to the facility.

The proposed permit is available for public review at AQMD, 21865 Copley Dr., Diamond Bar, CA 91765 and at the Rowland Heights Library, 1850 Nogales Street, Rowland Heights, CA 91748. Information

regarding the facility owner's compliance history submitted to the AQMD pursuant to California Health & Safety Code Section 42336, or otherwise known to the AQMD based on credible information, is also available from the AQMD for public review. For more information or to review additional supporting documents, call the AQMD's Title V hotline at (909) 396-3013. Written comments should be submitted to:

South Coast Air Quality Management District
Chemical/Mechanical Operations Team
21865 Copley Drive
Diamond Bar, CA 91765
Attention: Kien Huynh

Comments must be received by July 26, 2010. The AQMD will consider all public comments and may revise the Title V permit in accordance with AQMD rules and regulations.

The public may request AQMD to conduct a public hearing on the proposed permit by submitting a Hearing Request Form (Form 500-G) to Kien Huynh at the above AQMD address. The AQMD will hold a public hearing if there is evidence that the proposed permit is not correct or is not adequate to ensure compliance with regulatory requirements, and a hearing will likely provide additional information that will affect the drafting and/or issuance of the permit. A public hearing request form and the public hearing schedule may be obtained from the AQMD by calling the Title V hotline at (909) 396-3013, or from the internet at <http://www.aqmd.gov/titlev>. The request for a public hearing is due by July 12, 2010. A copy of the hearing request must also be sent by first class mail to the appropriate facility contact person listed above.

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<i>ENGINEERING & COMPLIANCE</i>	A/N	506428
APPLICATION PROCESSING AND CALCULATIONS	Processed By	KH
	Checked By	
	Date	4/12/10

Applicant's Name: Sapa Extruder, Inc.
Mailing Address: 18111 E. Railroad St.
City of Industry, CA 91748
Equipment Location: Same

Equipment Description:

APPLICATION NO. 506428: D66

BILLET PRE-HEAT FURNACE, ALUMINUM, GRANCO-CLARK, WITH EIGHTY-TWO GRANCO-CLARK NATURAL GAS-FIRED MAIN BURNERS, EACH 60,000 BTU PER HOUR, AND FOUR GRANCO-CLARK NATURAL GAS-FIRED PILOT BURNERS, EACH 40,000 BTU PER HOUR, ONE 30-HP CIRCULATION BLOWER, AND ONE 7.5-HP COMBUSTION AIR BLOWER.

HISTORY:

Application(s) received on: 2/5/10
Equipment installed: No
Violations recorded: 1 Notice to Comply was issued to the previous owner in the last 2 years. All concerns pertaining to the notice have been resolved.

The application was filed for Permit to Construct a new 5.08 MM BTU/hr billet pre-heat furnace replacing an existing 9 MM BTU/hr one (D10, A/N 502270).

The proposed burners are guaranteed to meet a NOx limit of 50 ppm @ 3% O2.

The applicant requested for 301 (u) expediting processing. The processing has been delayed for the following reasons:

- The required NOx guarantee was not received until June 3, 2010.
- The disagreement between the furnace rating and the sum of all burner ratings was not resolved until June 10, 2010.

PROCESS DESCRIPTION

The equipment is for preheating metal for forging.
It is fueled with natural gas.

CALCULATIONS:

Given:

Maximum Heat Input Rating, MM BTU/hr:

$$82 \text{ burners} * 0.06 \text{ MM BTU/hr-burner} + 4 \text{ burners} * 0.04 \text{ MM BTU/hr-burner} = 5.08 \text{ MM BTU/hr}$$

Fuel: Natural gas

Equipment Operating Load: 100%

Conversion Factors, ppm @ 3% O2 to lb/MM BTU

NOx	0.00121 [lb/mm btu]/ppm
CO	0.00074 [lb/mm btu]/ppm

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Operating Schedule:

hrs/day	24
days/wk	7
weeks/yr	52

NOx Concentration, ppm @ 3% O₂ (dry) 50

CO Concentration, ppm @ 3% O₂ (dry)

Emission Factors, lb/MM l (Default)

ROG:	0.0067
SOx :	0.0008
CO:	0.0333
PM:	0.0071
PM ₁₀ in total PM:	100%
HHV of natural gas:	1,050 BTU/ft ³
CO limit?	No

Computations:

VOC:

lb/hr	0.0067 lb/MM BTU*5.08 MM BTU =	0.03 lb/hr
lb/day Max.	0.03 lb/hr*24 hrs/day =	0.81 lb/day Max.
lb/day, Avg	0.03 lb/hr*24 hrs/day*1.00 (Load factor) =	0.81 lb/day, Avg
lb/yr	0.81 lb/day*7 days/wk*52 wks/yr =	295.86 lb/yr

NOx:

lb/MM BTU	0.00121 lb/MM BTU-ppm*50 ppm =	0.0607 lb/MM BTU
lb/hr	0.0607 lb/MM BTU*5.08 MM BTU/hr =	0.31 lb/hr
lb/day Max.	0.31 lb/hr*24 hrs/day =	7.40 lb/day Max.
lb/day, Avg	0.31 lb/hr*24 hrs/day*1.00 (Load factor) =	7.40 lb/day, Avg
lb/yr	7.40 lb/day*7 days/wk*52 wks/yr =	2693.92 lb/yr

SOx:

lb/hr	0.0008 lb/MM BTU*5.08 MM BTU =	0.004 lb/hr
lb/day Max.	0.004 lb/hr*24 hrs/day =	0.10 lb/day Max.
lb/day, Avg	0.004 lb/hr*24 hrs/day*1.00 (Load factor) =	0.10 lb/day, Avg
lb/yr	0.10 lb/day*7 days/wk*52 wks/yr =	35.08 lb/yr

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<i>ENGINEERING & COMPLIANCE</i>	A/N	506428
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CO:

lb/hr 0.0333 lb/MM BTU*5.08 MM BTU = 0.17 lb/hr
 lb/day Max. 0.17 lb/hr*24 hrs/day = 4.06 lb/day Max.
 lb/day, Avg 0.17 lb/hr*24 hrs/day*1.00 (Load factor) = 4.06 lb/day, Avg
 lb/yr 4.06 lb/day*7 days/wk*52 wks/yr = 1479.30 lb/yr

PM/PM10

lb/hr 0.0071 lb/MM BTU*5.08 MM BTU = 0.04 lb/hr
 lb/day Max. 0.04 lb/hr*24 hrs/day = 0.87 lb/day Max.
 lb/day, Avg 0.04 lb/hr*24 hrs/day*1.00 (Load factor) = 0.87 lb/day, Avg
 lb/yr 0.87 lb/day*7 days/wk*52 wks/yr = 316.99 lb/yr

	VOC	NOx	SOx	CO	PM/PM10
Factor (lb/MM BTU)	0.0067	0.0607	0.0008	0.0333	0.0071
lb/hr	0.03	0.31	0.004	0.17	0.04
lb/day					
Max.	0.81	7.40	0.10	4.06	1
Avg.	0.81	7.40	0.10	4.06	0.87
lb/yr	295.86	2,693.92	35.08	1,479.30	316.99

A/N 502270 lb/day Avg., w/ BACT	1.44	13.11	0.17	7.20	1.54
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NSR: (lb/day)

	RHC	NOx	SOx	CO	PM/PM10
Existing	15	209	5	64	35
A/N 506428	1	7	0	4	1
A/N 502270 (Recorded)	2	26	0	7	2
PTE	14	190	5	61	34

RULES EVALUATION

Rule 212:

(c) (1):

Emissions near a school

The equipment is not located within 1000 feet from the outer boundary of a school. (The nearest school is 2112 feet from the facility). This is not a project requiring notification under this paragraph.

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(c) (2): On-site emission increases exceeding the daily maximums
 There is no emission increase due to the modification. This is not a project requiring notification as described in this paragraph.

(c) (3): Emissions of toxic air contaminants
 There is no increase in emissions of toxic air contaminants due to the modification. This is not a project requiring notification under this paragraph.

(g): Emission increases exceeding the daily maximums
 There is no emission increase due to the modification. This is not a project subject to the notification requirements of subdivision (g) of this rule.

Rule 401:
 No visible emissions are expected from this type of equipment. Compliance is expected.

Rule 402:
 Nuisance problems due to the operation of this equipment are unlikely.

Rule 404:
 Combustion of natural gas does not generate a significant amount of PM emission. Compliance is expected

Rules 407/409:
 This equipment is fired with natural gas. Compliance is expected.

REGULATION XIII - New Source Review

Because there is no increase in maximum rating, and the potential to emit of any air contaminant will not be greater from the new source than from the replaced source, when the replaced source was operated at the same conditions and as if current BACT were applied, this is a functionally identical source replacement. Therefore, the equipment is exempt from the offsets and modeling requirements.

BACT:

	Limit	Proposed	Compliance
SOx	Nat. Gas	Nat. gas	Yes

Rule 1401:
 There is no increase in risk due to the functionally identical source replacement.

Rule 1703 - PSD Analysis:
 Because the functionally identical source replacement does not cause any CO emission increase, a PSD analysis is not triggered.

Rule 2005 - New Source Review for RECLAIM

NOx:

BACT:

	ppm @ 3% O ₂		
	Limit	Proposed	Compliance
NOx	50	50	Yes

<p>SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</p> <p><i>ENGINEERING & COMPLIANCE</i></p> <p>APPLICATION PROCESSING AND CALCULATIONS</p>	<p>Page 5 of 5</p> <p>A/N 506428</p> <p>Processed By KH</p> <p>Checked By</p> <p>Date 4/12/10</p>
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RTCs:

There is no emission increase due to the functionally identical source replacement. Therefore, additional RTCs are not required for the equipment installation.

Modeling:

Functionally identical source replacement is not subject to the modeling requirements per Rule 2005 (k) (1).

DISCUSSIONS

Based on information submitted with the application and the above evaluation, it is determined that the equipment will operate in compliance with all the applicable rules and regulations of the District.

RECOMMENDATIONS

APPLICATION NO. 506428:

Issue Permit to Construct subject to permit conditions as stated in Section H.

Calculations
Potential to Emit of Replaced Equipment with BACT

A/N: 502270

Given:

Fuel:		Natural gas
Maximum Heat Input Rating, MM BTU/hr:		9
Average Equipment Operating Load:		100%
Conversion Factors, ppm @ 3% O ₂ to lb/MM BTU		
NOx		0.00121
CO		0.00074
Operating Schedule:		
hrs/day		24
days/wk		7
weeks/yr		52
NOx Concentration, ppm @ 3% O ₂ (dry)	BACT	50
CO Concentration, ppm @ 3% O ₂ (dry)		
Emission Factors, lb/MM BTU:		
ROG:		0.0067
CO:		0.0333
SOx :		0.0008
PM:		0.0071
PM ₁₀ in total PM:		100%
HHV of natural gas:		1,050 BTU/ft ³

Computations:

	ROG	NOx	SOx	CO	PM/PM10
Factor (lb/10 ⁶ BTU)	0.0067	0.0607	0.0008	0.0333	0.0071
lb/hr	0.06	0.55	0.007	0.30	0.06
lb/day					
Max.	1.44	13.11	0.17	7.20	1.54
Avg.	1.44	13.11	0.17	7.20	1.54
lb/yr	524.16	4,772.69	62.15	2,620.80	561.60