

Applicant's Name: Rohr, Inc.

Company ID No.: 800113

Mailing Address: 8200 Arlington Ave., Riverside, CA 92503

Equipment Address: 8200 Arlington Ave., Riverside, CA 92503

Title V/RECLAIM Revision:
Application 527008

PERMIT TO CONSTRUCT Spray Booth (new construction)

Equipment	ID No.	Connected To	Source Type/ Monitoring Unit	Emissions	Conditions
Process 4: SURFACE COATING					P2.1
System 1: PRODUCTION SPRAY BOOTHS					
SPRAY COATING OPERATION, G-Y, 18 FT-0 IN W. X 19FT-0 IN L. X 8 FT-10IN H., 1-BLANKET, 36SQFT, 12-24" X 24" PANEL, 12-24" X 24" X 15" POCKET, 12-24" X 24" X 11.5" HEPA FILTERS, WITH A 15.0-HP EXHAUST FAN, WITH SPRAY BOOTH Functional Identical replacement to a/n 440405 A/N 527000	D268			HAP: (10)[40CFR 63 Subpart GG,12-8-2000]; PM: (9) [RULE 404, 2-7-1986]; VOC: (9) [RULE 1124, 9-21-2001; RULE 1171,11-7-2003; <i>RULE 1171, 2-1-2008</i>]	A63.14, C6.10, D182.2, D322.1, E71.1, E71.4, E175.9, H23.11, K67.1, K67.2, K67.6, L341.4

Equipment	ID No.	Connected To	Source Type/ Monitoring Unit	Emissions	Conditions
Process 4: SURFACE COATING					P2.1
System 2: SUPPORT OPERATION SPRAY BOOTHS					
SPRAY COATING OPERATION, G-X, 21 FT-4 IN W. X 24FT-8 IN L. X 12 FT-2IN H., 1-BLANKET, 36SQFT, 6-24" X 24" PANEL, 6-24" X 24" X 15" POCKET, 4-24" X 24" X 11.5" HEPA FILTERS, WITH A 7.5-HP EXHAUST FAN, WITH SPRAY BOOTH. Functional Identical replacement to a/n 440397 A/N 526999	D267			HAP: (10)[40CFR 63 Subpart GG,12-8-2000]; PM: (9) [RULE 404, 2-7-1986]; VOC: (9) [RULE 1124, 9-21-2001; RULE 1171,11-7-2003; <i>RULE 1171, 2-1-2008</i>]	A63.17, C6.10, D182.2, D322.1, E71.6, E71.4, E175.9, H23.11, K67.1, K67.2, K67.6, L341.3

PERMIT CONDITIONS

The equipment will be subject to the following permit conditions

P2.1 THE OPERATOR SHALL LIMIT THE EMISSIONS FROM THIS PROCESS AS FOLLOWS:

CONTAMINANT	EMISSION LIMIT
VOC	LESS THAN OR EQUAL TO 1179 LBS IN ANY ONE DAY

For the purposes of this condition, the emission limit(s) shall be based on the total combined emissions from process 1(Ovens) and 4(Surface Coating).

A63.14

THE OPERATOR SHALL LIMIT EMISSIONS FROM THIS EQUIPMENT AS FOLLOWS:

CONTAMINANT	EMISSIONS LIMIT
VOC	LESS THAN OR EQUAL TO 25 LBS IN ANY ONE DAY

For the purpose of this condition, and for exemption from Rule 1132 by (h)(2), the VOC emissions from this spray booth shall be defined as the monthly average for each calendar month, calculated by dividing the total emissions from this spray booth for the calendar month by the number of calendar days in that month.

A63.17

THE OPERATOR SHALL LIMIT EMISSIONS FROM THIS EQUIPMENT AS FOLLOWS:

CONTAMINANT	EMISSIONS LIMIT
VOC	LESS THAN OR EQUAL TO 12 LBS IN ANY ONE DAY

For the purpose of this condition, and for exemption from Rule 1132 by (h)(2), the VOC emissions from this spray booth shall be defined as the monthly average for each calendar month, calculated by dividing the total emissions from this spray booth for the calendar month by the number of calendar days in that month.

C6.10

THE OPERATOR SHALL USE THIS EQUIPMENT IN SUCH A MANNER THAT THE DIFFERENTIAL PRESSURE BEING MONITORED, AS INDICATED BELOW, DOES NOT EXCEED 2.0 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 media.

D182.2

The operator shall test this equipment in accordance with the following specifications:

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

D322.1

THE OPERATOR SHALL PERFORM A WEEKLY INSPECTION OF THE EQUIPMENT AND FILTER MEDIA FOR LEAKS, BROKEN OR TORN FILTER MEDIA, AND IMPROPERLY INSTALLED FILTER MEDIA.

E71.1

The operator shall only operate this equipment if the exhaust fan of this equipment is operating at 10,000 scfm or greater. If the exhaust fan is repaired, modified, or replaced, the operator shall conduct tests to determine the exhaust flow rate.

E71.4

The operator shall not turn off the exhaust fan of this equipment until 30 seconds after spraying operations have ceased when coatings containing hexavalent chrome have been sprayed.

E71.6

The operator shall only operate this equipment if the exhaust fan of this equipment is operating at less than 10,000 scfm. If the exhaust fan is repaired, modified, or replaced, the operator shall conduct tests to determine the exhaust flow rate.

E175.9

The operator shall not use this equipment unless all exhaust air passes through the following:

Four stage filters consisting of blanket filters, panel filters, pocket filters and HEPA filters as described in the equipment description. The HEPA filters shall be individually DOP tested (or equivalent) with 0.3 micron particulates and certified to have a control efficiency of not less than 99.97%, as required by AQMD Rule 1469.1

H23.11

THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES OR REGULATIONS:

CONTAMINANT	RULE	RULE/SUBPART
VOC	DISTRICT RULE	109
PM	DISTRICT RULE	481
HEXAVALENT CHROME	DISTRICT RULE	1469.1

K67.1

THE OPERATOR SHALL KEEP RECORDS, IN A MANNER APPROVED BY THE DISTRICT, FOR THE FOLLOWING PARAMETER(S) OR ITEM(S):

- the name of the person performing the inspection and/or maintenance of the filter media
- the date, time and results of the inspection
- the date, time and description of any maintenance or repairs resulting from the inspection

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING AND COMPLIANCE Coating, Printing and Aerospace Operations Team PERMIT APPLICATION EVALUATION	Page	4 of 17
	App. number(s)	526999-527008
	Processed by	Rene Loof
	Reviewed by	Hamed Mandilawi
	Date	11/04/11

K67.2

THE OPERATOR SHALL KEEP RECORDS, IN A MANNER APPROVED BY THE DISTRICT, FOR THE FOLLOWING PARAMETER(S) OR ITEM(S):

weekly record of pressure drop across the filter media

K67.6

THE OPERATOR SHALL KEEP RECORDS, IN A MANNER APPROVED BY THE DISTRICT, FOR THE FOLLOWING PARAMETER(S) OR ITEM(S):

daily usage and volatile organic compound emissions in a manner approved by the Executive Officer

L341.3

WITHIN 7 DAYS AFTER START-UP OF THIS EQUIPMENT, THE FOLLOWING DEVICES SHALL BE REMOVED FROM OPERATION:

D42

L341.4

WITHIN 7 DAYS AFTER START-UP OF THIS EQUIPMENT, THE FOLLOWING DEVICES SHALL BE REMOVED FROM OPERATION:

D30

PERMIT TO CONSTRUCT
Spray Booth (modification)

EQUIPMENT DESCRIPTION:

Equipment	ID No.	Connected To	Source Type/ Monitoring Unit	Emissions	Conditions
Process 4: SURFACE COATING					P2.1
System 1: PRODUCTION SPRAY BOOTHS					
SPRAY COATING OPERATION, G-31, 1926 FT-8 IN W. X 736 FT-6 IN L. X 102 FT-0 IN H., 1-BLANKET, 50-24 IN X 24 IN, 36 SQFT, SECOND/THIRD STAGE FILTERS 15-24" X 24" PANEL, 15-24" X 24" X 15" POCKET, 15-24" X 24" X 11.5" HEPA FILTERS WITH 1-7.548.42-HP EXHAUST FAN, WITH SPRAY BOOTH.	D151			HAP: (10)[40CFR 63 Subpart GG, 12-8-2000]; PM: (9) [RULE 404, 2-7-1986]; VOC: (9) [RULE 1124, 9-21-2001; RULE 1171, 11-7-2003; RULE 1171, 2-1-2008]	A63.23, B27.1 , B59.11, C1.6, C6.10, D182.2, D322.1, E71.1, E71.4, E175.49, H23.511, K67.1, K67.2, K67.6
A/N 440419 527005					

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
ENGINEERING AND COMPLIANCE**

Coating, Printing and Aerospace Operations Team

PERMIT APPLICATION EVALUATION

Page 5 of 17
App. number(s) 526999-527008
Processed by Rene Loof
Reviewed by Hamed Mandilawi
Date 11/04/11

<p>SPRAY COATING OPERATION, G-10, 18 FT W. X 18FT L. X 9 FT H., 1-BLANKET, 36SQFT 24IN X 24IN, SECOND/THIRD STAGE FILTERS, 15-24" X 24" PANEL, 15-24" X 24" X 15" POCKET, 15-24" X 24" X 11.5" HEPA FILTERS, WITH TWO 7.5<u>20.96</u>-HP EXHAUST FANS, WITH SPRAY BOOTH.</p> <p>A/N 440408 <u>527006</u></p>	D28			<p>HAP: (10)[40CFR 63 Subpart GG,12-8-2000]; PM: (9) [RULE 404, 2-7-1986]; VOC: (9) [RULE 1124, 9-21-2001; RULE 1171,11-7-2003; <i>RULE 1171, 2-1-2008</i>]</p>	<p>A63.14, C6.10, D182.2, D322.1, E71.1, <u>E71.4</u>, E175.49, H23.51, K67.1, K67.2, K67.6</p>
<p>SPRAY COATING OPERATION, METALIZING, SOLVENT, G-2A, 4 SECTIONS, EACH 16 FT W. X 20FT L. X 12 FT H., 1-BLANKET, 36SQFT 48-24IN X 24IN, SECOND/THIRD STAGE FILTERS, 15-24" X 24" PANEL, 15-24" X 24" X 15" POCKET, 15-24" X 24" X 11.5" HEPA FILTERS, WITH FOUR<u>1-15.044.36</u>HP EXHAUST FAN, WITH SPRAY BOOTH.</p> <p>A/N 440395 <u>527007</u></p>	D41			<p>HAP: (10)[40CFR 63 Subpart GG,12-8-2000]; PM: (9) [RULE 404, 2-7-1986]; VOC: (9) [RULE 1124, 9-21-2001; RULE 1171,11-7-2003; <i>RULE 1171, 2-1-2008</i>]</p>	<p>A63.14<u>14</u>, B59.31<u>1</u>, C1.4, C6.10, D182.2, D322.1, E71.3<u>1</u>, <u>E71.4</u>, E175.49, H23.51, K67.1, K67.2, K67.6</p>
<p>SPRAY COATING OPERATION, METALIZING, SOLVENT, G-2B, 16 FT W. X 20FT L. X 12 FT H., 1-BLANKET, 36SQFT, 15-24" X 24" PANEL, 15-24" X 24" X 15" POCKET, 15-24" X 24" X 11.5" HEPA FILTERS, WITH 1-44.36HP EXHAUST FAN, WITH SPRAY BOOTH.</p> <p>A/N 440395 <u>528002</u></p>	D270			<p>HAP: (10)[40CFR 63 Subpart GG,12-8-2000]; PM: (9) [RULE 404, 2-7-1986]; VOC: (9) [RULE 1124, 9-21-2001; RULE 1171,11-7-2003; <i>RULE 1171, 2-1-2008</i>]</p>	<p>A63.14, B59.11, C1.4, C6.10, D182.2, D322.1, E71.1, E71.4, E175.9, H23.11, K67.1, K67.2, K67.6</p>
<p>SPRAY COATING OPERATION, METALIZING, SOLVENT, G-2C, 16 FT W. X 20FT L. X 12 FT H., 1-BLANKET, 36SQFT, 15-24" X 24" PANEL, 15-24" X 24" X 15" POCKET, 15-24" X 24" X 11.5" HEPA FILTERS, WITH 1-44.36HP EXHAUST FAN, WITH SPRAY BOOTH.</p> <p>A/N 440395 <u>528003</u></p>	D271			<p>HAP: (10)[40CFR 63 Subpart GG,12-8-2000]; PM: (9) [RULE 404, 2-7-1986]; VOC: (9) [RULE 1124, 9-21-2001; RULE 1171,11-7-2003; <i>RULE 1171, 2-1-2008</i>]</p>	<p>A63.14, B59.11, C1.4, C6.10, D182.2, D322.1, E71.1, E71.4, E175.9, H23.11, K67.1, K67.2, K67.6</p>

SPRAY COATING OPERATION, METALIZING, SOLVENT, G-2D, 16 FT W. X 20FT L. X 12 FT H., 1-BLANKET, 36SQFT, 15-24" X 24" PANEL, 15-24" X 24" X 15" POCKET, 15-24" X 24" X 11.5" HEPA FILTERS, WITH 1-44.36HP EXHAUST FAN, WITH SPRAY BOOTH. A/N 440395 <u>528005</u>	D272			HAP: (10)[40CFR 63 Subpart GG,12-8-2000]; PM: (9) [RULE 404, 2-7-1986]; VOC: (9) [RULE 1124, 9-21-2001; RULE 1171,11-7-2003; <i>RULE 1171, 2-1-2008</i>]	A63.14, B59.11, C1.4, C6.10, D182.2, D322.1, E71.1, E71.4, E175. 9, H23.11, K67.1, K67.2, K67.6
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PERMIT CONDITIONS

The equipment will be subject to the following permit conditions

P2.1 THE OPERATOR SHALL LIMIT THE EMISSIONS FROM THIS PROCESS AS FOLLOWS:

CONTAMINANT	EMISSION LIMIT
VOC	LESS THAN OR EQUAL TO 1179 LBS IN ANY ONE DAY

For the purposes of this condition, the emission limit(s) shall be based on the total combined emissions from process 1(Ovens) and 4(Surface Coating).

A63.23

THE OPERATOR SHALL LIMIT EMISSIONS FROM THIS EQUIPMENT AS FOLLOWS:

CONTAMINANT	EMISSIONS LIMIT
VOC	LESS THAN OR EQUAL TO 25 LBS IN ANY ONE DAY

A63.14

THE OPERATOR SHALL LIMIT EMISSIONS FROM THIS EQUIPMENT AS FOLLOWS:

CONTAMINANT	EMISSIONS LIMIT
VOC	LESS THAN OR EQUAL TO 25 LBS IN ANY ONE DAY

For the purpose of this condition, and for exemption from Rule 1132 by (h)(2), the VOC emissions from this spray booth shall be defined as the monthly average for each calendar month, calculated by dividing the total emissions from this spray booth for the calendar month by the number of calendar days in that month.

A63.16

THE OPERATOR SHALL LIMIT EMISSIONS FROM THIS EQUIPMENT AS FOLLOWS:

CONTAMINANT	EMISSIONS LIMIT
VOC	LESS THAN OR EQUAL TO 150 LBS IN ANY ONE DAY

For the purpose of this condition, and for exemption from Rule 1132 by (h)(2), the VOC emissions from this spray booth shall be defined as the monthly average for each calendar month, calculated by dividing the total emissions from this spray booth for the calendar month by the number of calendar days in that month.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING AND COMPLIANCE Coating, Printing and Aerospace Operations Team PERMIT APPLICATION EVALUATION	Page	7 of 17
	App. number(s)	526999-527008
	Processed by	Rene Loof
	Reviewed by	Hamed Mandilawi
	Date	11/04/11

~~B27.1~~

~~THE OPERATOR SHALL NOT USE MATERIALS CONTAINING ANY COMPOUND IDENTIFIED IN THE SCAQMD RULE 1401, AS AMENDED 07 DEC 1990.~~

B59.11

THE OPERATOR SHALL NOT USE THE FOLLOWING MATERIAL(S) IN THIS DEVICE:

Materials containing any toxic air contaminants identified in table 1 of the SCAQMD Rule 1401 as amended December 7, 1990 or earlier except hexavalent chrome.

~~B59.3~~

~~THE OPERATOR SHALL NOT USE THE FOLLOWING MATERIAL(S) IN THIS DEVICE:~~

~~Metalizing wire containing any toxic air contaminants identified in table 1 of the SCAQMD Rule 1401 as amended December 7, 1990 or earlier.~~

C1.4

THE OPERATOR SHALL LIMIT THE MATERIAL PROCESSED TO NO MORE THAN 43 LB(S) IN ANY ONE DAY.

For the purpose of this condition, material processed shall be defined as metalizing wire.

The limit shall be based on the total combined limit for equipment D41, D270, D271 & D272

C1.6

THE OPERATOR SHALL LIMIT THE COATING AND SOLVENT USAGE TO NO MORE THAN 2 GALLON(S) PER DAY.

For the purpose of this condition, coating and solvent usage shall be defined as the total quantity of chrome containing materials used in this equipment ~~and shall be an exception to condition B27.1.~~

C6.10

THE OPERATOR SHALL USE THIS EQUIPMENT IN SUCH A MANNER THAT THE DIFFERENTIAL PRESSURE BEING MONITORED, AS INDICATED BELOW, DOES NOT EXCEED 2.0 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 media.

D182.2

The operator shall test this equipment in accordance with the following specifications:

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

D322.1

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING AND COMPLIANCE Coating, Printing and Aerospace Operations Team PERMIT APPLICATION EVALUATION	Page	8 of 17
	App. number(s)	526999-527008
	Processed by	Rene Loof
	Reviewed by	Hamed Mandilawi
	Date	11/04/11

THE OPERATOR SHALL PERFORM A WEEKLY INSPECTION OF THE EQUIPMENT AND FILTER MEDIA FOR LEAKS, BROKEN OR TORN FILTER MEDIA, AND IMPROPERLY INSTALLED FILTER MEDIA.

E71.1

The operator shall only operate this equipment if the exhaust fan of this equipment is operating at 10,000 scfm or greater. If the exhaust fan is repaired, modified, or replaced, the operator shall conduct tests to determine the exhaust flow rate.

E71.4

The operator shall not turn off the exhaust fan of this equipment until 30 seconds after spraying operations have ceased when coatings containing hexavalent chrome have been sprayed.

E71.6

The operator shall only operate this equipment if the exhaust fan of this equipment is operating less than 10,000 scfm. If the exhaust fan is repaired, modified, or replaced, the operator shall conduct tests to determine the exhaust flow rate.

E175.9

The operator shall not use this equipment unless all exhaust air passes through the following:

Four stage filters consisting of blanket filters, panel filters, pocket filters and HEPA filters as described in the equipment description. The HEPA filters shall be individually DOP tested (or equivalent) with 0.3 micron particulates and certified to have a control efficiency of not less than 99.97%, as required by AQMD Rule 1469.1

H23.11

THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES OR REGULATIONS:

CONTAMINANT	RULE	RULE/SUBPART
VOC	DISTRICT RULE	109
PM	DISTRICT RULE	481
HEXAVALENT CHROME	DISTRICT RULE	1469.1

K67.1

THE OPERATOR SHALL KEEP RECORDS, IN A MANNER APPROVED BY THE DISTRICT, FOR THE FOLLOWING PARAMETER(S) OR ITEM(S):

the name of the person performing the inspection and/or maintenance of the filter media

the date, time and results of the inspection

the date, time and description of any maintenance or repairs resulting from the inspection

K67.2

THE OPERATOR SHALL KEEP RECORDS, IN A MANNER APPROVED BY THE DISTRICT, FOR THE FOLLOWING PARAMETER(S) OR ITEM(S):

weekly record of pressure drop across the filter media

K67.6

THE OPERATOR SHALL KEEP RECORDS, IN A MANNER APPROVED BY THE DISTRICT, FOR THE FOLLOWING PARAMETER(S) OR ITEM(S):

daily usage and volatile organic compound emissions in a manner approved by the Executive Officer

PERMIT TO OPERATE
Spray Booth (change of condition)

Applications 527001 – 527004 submitted to change the condition H23.5 under devices **D244**, D217 D207 & D205 to H23.11 which adds Rule 1469.1. The above spray booths are allowed to spray materials containing hexavalent chrome.

H23.5 This equipment is subject to the applicable requirements of the following rules or regulations:

<u>Contaminant</u>	<u>Rule</u>	<u>Rule/Subpart</u>
VOC	District Rule	109
PM	District Rule	481

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

<u>Contaminant</u>	<u>Rule</u>	<u>Rule/Subpart</u>
VOC	District Rule	109
Chromium, Hexavalent	Distric Rule	1469.1
PM	District Rule	481

ADD:

E71.4

The operator shall not turn off the exhaust fan of this equipment until 30 seconds after spraying operations have ceased when coatings containing hexavalent chrome have been sprayed.

HISTORY:

To comply with District Rule 1469.1, Rohr Inc. has submitted Application Nos 526999 - 527007 & 526008 on 9/09/11. Applications 526999 & 527000 were submitted to replace two existing booths G-15(D42) and G-12(D30) with two new booths that are equipped with HEPA filters for Rule 1469.1 compliance. The two existing booths will be removed from service when the two new booths are operational. Applications 527001 – 527004 were submitted to change the conditions for G80(D244), G37(D217), G35(D207) & G33(D205) by demonstrating compliance with Rule 1469.1(d)(3)(B). Applications 527005 – 527007 were submitted to modify G31(D151), G10(D28) & G2(D41) by adding

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING AND COMPLIANCE Coating, Printing and Aerospace Operations Team PERMIT APPLICATION EVALUATION	Page	10 of 17
	App. number(s)	526999-527008
	Processed by	Rene Loof
	Reviewed by	Hamed Mandilawi
	Date	11/04/11

rows of HEPA filters to their respective exhausts. Application no. 527008 was submitted as the RECLAIM/Title V Permit Revision application for these changes. Application nos. 528002, 528003 & 528005 were submitted on 10/06/2011 to break up D41. D41 is made up of four distinct spray booths which each has a separate blower and are capable of operating independently of each other. It was determine that this device should actually be four separate units. Therefore, Rohr submitted the additional applications.

The company is a Title V source and is a Cycle 2 RECLAIM facility for NOx emissions. The company is located in an industrial zone with nearby residential areas located to the north and south of the property. A review of District compliance records indicates that there are no Public Complaints filed or Notices of Violations issued in the last two years. However, the facility was issued a Notice to Comply (D03249) on 3/03/10 requiring the facility to comply with the provisions of Rule 109. The applicant provided the requested information and is currently operating in compliance with applicable permit conditions and rules and regulations.

PROCESS DESCRIPTION:

Rohr, Inc. is a subsidiary of the Goodrich Corporation, and is a large producer of military and commercial aerospace products. Rohr Inc., performs metal and composite materials processing, structural bonding and assemble operations at its facility located in Riverside, California. Manufacturing processes conducted at this location include composite bonding, resin curing, core stabilizing, primer and topcoat spray coating, roller coating , degreasing, solvent cleaning, metal surface preparation, abrasive blasting, tool preparation, and tool storage. All manufacturing processes conducted at this facility are operated under stringent Federal Aviation Administration (FAA) regulations and commercial aircraft and military specifications.

Currently Rohr complies with the requirements of Rule 1469.1 by demonstrating compliance with Rule 1469.1 (d)(3)(C) through a risk assessment under AB2588 showing that the facility’s cancer risk is less than 25 in a million. Permit conditions were imposed on the spray booths requiring them to demonstrate compliance with the transfer efficiency of the spray guns. The high transfer efficiency was used in estimating the emissions from the chrome spray booths in determining the risk from the facility for purposes of AB2588. Rather than demonstrating compliance with the transfer efficiency, the facility is proposing to comply with the rule requirements by demonstrating compliance with Rule 1469.1 (d)(3)(B)-“ Ventilate each source at a facility to air pollution control equipment with a rated particulate filtration efficiency of 99.97% or higher, for particulate matter 0.3 microns and larger “. To accomplish the above, the facility is proposing to (1) replace two spray booths with two identical spray booths equipped with three stage dry filter booths with the last stage being a bank of HEPA filters, (2) modifying three other booths to add banks of HEPA filters and (3) demonstrating that four other booths already meet the requirements of the rule. With the installation of the HEPA filters, Rohr will comply with the requirements of section d(3)(B) by having each 1469.1 source at this facility ventilated to air pollution control equipment with a rated particulate filtration efficiency of 99.97% or higher, for particulate matter 0.3 microns and larger.

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

EMISSION CALCULATIONS:

All the proposed changes to the spray booths will result in emission reductions due to the installation of the HEPA filters or demonstrating that the existing HEPA filters meet the requirements of Rule 1469.1.

New Construction/replacement

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING AND COMPLIANCE Coating, Printing and Aerospace Operations Team PERMIT APPLICATION EVALUATION	Page	11 of 17
	App. number(s)	526999-527008
	Processed by	Rene Loof
	Reviewed by	Hamed Mandilawi
	Date	11/04/11

Application no. 526999 (G15,GX) (Previous D42)

Previous a/n 440397 Rule 1132 voc cap – 12 lbs/day, G15 predates rule 1401.

Emissions will remain the same:

AEIS:

	R1(lbs/hr)	R2(lbs/hr)
ROG:	1.10	1.10

Rule 1401 requirement.

No Limit

Application no. 527000 (G12, GY)(Previous D30)

Previous a/n 440405 Rule 1132 voc cap – 25 lbs/day, G12 predates rule 1401.

Emissions will remain the same:

AEIS:

	R1(lbs/hr)	R2(lbs/hr)
ROG:	3.30	3.30

Rule 1401 requirement.

No Limit

Change of Condition

Application no. 527001(G80) D244

Previous a/n 466660 Rule 1132 voc cap – 15 lbs voc/day, 0.35 lb/yr Cr controlled.

No change in emissions. Demonstrating that current booth complies with 1469.1 requirements.

Application no. 527002 (G37) D217

Previous a/n 440427 Rule 1132 voc cap – 11 lbs voc/day, 13.6 lb/month Cr uncontrolled.

No change in emissions. Demonstrating that current booth complies with 1469.1 requirements.

Emissions will remain the same:

AEIS:

	R1(lbs/hr)	R2(lbs/hr)
ROG:	0.69	0.69
PM10:	0.26	0.01

NSR:

	lbs/day
ROG	11.0

Rule 1401 requirement.

	R1 (lbs/month)
Cr:	13.6

Application no. 527003 (G35) D207

Previous a/n 440424 Rule 1132 voc cap – 10 lbs voc/day, 11.5 lb/month Cr uncontrolled.

No change in emissions. Demonstrating that current booth complies with 1469.1 requirements.

Emissions will remain the same:

AEIS:

	R1(lbs/hr)	R2(lbs/hr)
ROG:	0.44	0.44

NSR:

	lbs/day
ROG	10.0

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING AND COMPLIANCE Coating, Printing and Aerospace Operations Team PERMIT APPLICATION EVALUATION	Page	12 of 17
	App. number(s)	526999-527008
	Processed by	Rene Loof
	Reviewed by	Hamed Mandilawi
	Date	11/04/11

Rule 1401 requirement.
 R1 (lbs/month)
 Cr: 11.5

Application no. 527004 (G33) D205
 Previous a/n 440421 Rule 1132 voc cap – 10 lbs voc/day, 9.3 lb/month Cr uncontrolled.
 No change in emissions. Demonstrating that current booth complies with 1469.1 requirements.
 Emissions will remain the same:

AEIS:

	R1(lbs/hr)	R2(lbs/hr)
ROG:	0.50	0.50

NSR:

	lbs/day
ROG	10.0

Rule 1401 requirement.
 R1 (lbs/month)
 Cr: 10.0

Modification
Application no. 527005 (G31) D151
 Previous a/n 440419 Rule 1132 voc cap – 25 lbs voc/day, 2 gallons Cr containing compounds, uncontrolled.

Emissions will remain the same:
 AEIS:

	R1(lbs/hr)	R2(lbs/hr)
ROG:	1.60	1.60
Pm10	0.59	0.01

Rule 1401 requirement.
 16.63 Limit based on previous evaluation under a/n 337152 from an uncontrolled daily of 0.665 lbs Cr per day, 6 days/week, 50 week/yr, and 12 months
 R1 (lbs/month)
 Cr: $0.665 \text{ lb Cr/day} \times (6 \text{ days/week}) \times (50 \text{ weeks/yr}) / (12 \text{ months/yr}) = 16.625 \text{ lbs/month}$

Application no. 527006 (G10) D28
 Previous a/n 440408 Rule 1132 voc cap – 25 lbs voc/day, No Cr limit.
 Emissions will remain the same:

AEIS:

	R1(lbs/hr)	R2(lbs/hr)
ROG:	0.10	0.10

Rule 1401 requirement.
 No limit(Existing Source Pre-1401)

Application no. 527007 (G2) D41
 Previous a/n 440395 Rule 1132 voc cap – 150 lbs voc/day, 43lbs metalizing wire. No Cr limit.

D41 will be separated into four different spray booths with a CFM of 23,040 each. Rule 1132 limits the VOC emissions per booth to 25 lbs/day. The total VOC emissions from these four booths will be reduced from 150 lbs/day to 100 lbs/day.

Emissions will be changed to the following:

Per booth D41, D270, D271 & D272

AEIS:

	R1(lbs/hr)	R2(lbs/hr)
ROG:	3.13	3.13

Rule 1401 requirement.

No limit(Existing Source Pre-1401)

Emissions Summary:

Application No.	Device #	VOC Cap	Chrome Usage
526999	(D42)GX	12 (R1132)	No Limit
527000	(D30)GY	25 (R1132)	No Limit
527001	D244	15	0.35 lbs/yr
527002	D217	11	13.6 lbs/month
527003	D207	10	11.5 lbs/month
527004	D205	10	9.3 lbs/month
527005	D151	25 (R1132)	2 gallons
527006	D28	25 (R1132)	No Limit
527007	D41	15025	No Limit
528002	D270	25 (R1132)	No Limit
528003	D271	25 (R1132)	No Limit
528005	D275	25 (R1132)	No Limit

RULES/REGULATION

EVALUATION:

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

Rule 212 (c)(2):This section requires a public notice for all new or modified facilities that have on-site emission increases exceeding any of the daily maximums as specified by Rule 212(g).
The proposed project will not result in an emission increase for the entire facility that will exceed the daily maximums as specified under 212(g). A Rule 212(c)(2) notice will not be triggered.

Rule 212(c)(3):This section requires a public notice for all new or modified permit unit with increases in emissions of toxic air contaminants listed in Table I of Rule 1401 resulting in MICR greater than 1E-6 per permit unit or greater than 10E-6 per facility.
The proposed project will not result in an increase of toxic emissions that will cause a MICR of one in a million or greater or generate a hazard index in excess of one.
Therefore Public Notice is not required under this section of the rule.

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

There is no emission increase due to the operation of this equipment. The following summarizes emissions from this project:

	Maximum Daily Emissions					
	<u>ROG</u>	<u>NO_x</u>	<u>PM₁₀</u>	<u>SO₂</u>	<u>CO</u>	<u>Pb</u>
Emission increase	0	0	0	0	0	0
MAX Limit (lb/day)	30	40	30	60	220	3
Compliance Status	Yes	Yes	Yes	Yes	Yes	Yes

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

RULE 401, VISIBLE EMISSIONS

With the proper use of the equipment, no visible emissions are expected. Compliance with this rule is expected.

RULE 402, NUISANCE

With the proper operation of the equipment, no nuisance problems are expected at this facility. Compliance with this rule is expected.

RULE 1124, AEROSPACE ASSEMBLY AND COMPONENT MANUFACTURING OPERATIONS

The replacement, modification and change of condition will not result in a change in the operation and the facility will continue to use compliant coatings within these booths. The inclusion of HEPA filters will not impact the VOC emissions.

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

The facility is subject to the requirements of this rule. These spray booths will meet the exemption from section (c) of this rule by meeting the requirements of 1132(h)(2). The allowable VOC emissions for these booths are listed below. Therefore these spray booths qualify and will meet the exemption requirements. Continued compliance with this rule is expected.

Application No.	Device #	VOC Cap	CFM
526999	GX	12	6,125
527000	GY	25	18,360
527001	D244	15	25,000
527002	D217	11*	11,521
527003	D207	10*	12,118
527004	D205	10*	13,279
527005	D151	25*	18,005
527006	D28	25	22,139
527007	D41	15025**	113,230 23,040
528002	D270	25**	23,040
528003	D271	25**	23,040
528005	D272	25**	23,040

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING AND COMPLIANCE Coating, Printing and Aerospace Operations Team PERMIT APPLICATION EVALUATION	Page	15 of 17
	App. number(s)	526999-527008
	Processed by	Rene Loof
	Reviewed by	Hamed Mandilawi
	Date	11/04/11

*Prior to 1132, the equipment had the existing VOC cap.

**Device 41 has been broken-up into four separate booths. The consequence resulted in an individual CFM rating that only allowed for a 25 lbs VOC per day emission limit. The total emissions from all four will be reduce from 150 lbs VOC per day to 100 lbs VOC per day.

RULE 1171, SOLVENT CLEANING OPERATIONS

The company will be using acetone for spray gun cleaning. Acetone is defined as an exempt compound under Rule 102. Compliance with this rule is expected.

REGULATION XIII

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

The proposed changes to the spray booths will not result in any emission increase. The installation of the HEPA filters will actually result in PM emission reduction. Compliance with this section is expected.

RULE 1303(b)(1), MODELING

The addition of the HEPA filters to the spray booths will result in a PM10 emission that will be well below the Appendix A screening level for non-combustion sources of 0.41 lbs PM10/hr. Compliance with the modeling requirements is expected.

RULE 1304(c)(1), OFFSET EXEMPTIONS

The changes to the spray booths will not result in the increased emission of any criteria pollutant for the facility. Therefore no offsets will be required for this project.

RULE 1401, NEW SOURCE REVIEW OF TOXIC AIR CONTAMINANTS

The changes to the spray booths with the addition of HEPA filters will result in an emission reduction. These new booths are considered a functionally identical replacement/modifications with no emission increase and are exempt from the requirements under subdivision (d) according to 1401(g)(c), Functional Identical Replacements with No Increase in Risk. Compliance with this Rule is expected.

RULE 1469.1, SPRAYING OPERATIONS USING COATINGS CONTAINING CHROMIUM

The applications 526999 & 527000 were submitted to replace D42 & D30 waterwash spray booths with booths equipped with HEPA filters. Also, application nos. 527001- 527005 were submitted to demonstrate compliance with rule 1469.1. Application nos. 527006 & 527007 were submitted to modify the existing booths D28 & D41 to add HEPA filter to the exhaust systems. Application no. 528002, 528003 & 528005 were submitted to break up D41 into four separate booths with a bank of HEPA filters. Rohr originally met the requirements of Rule 1469.1 by complying with (d)(3)(C)(i) or having a health risk of 25 in a million or less. With the installation of the HEPA filters, ROHR will comply with the requirements of section d(3)(B) by having each 1469.1 source at this facility ventilated to air pollution control equipment with a rated particulate filtration efficiency of 99.97% or higher, for particulate matter 0.3 microns and larger; Compliance with this rule is expected.

REGULATION XX-RECLAIM

RULE 2005-NEW SOURCE REVIEW FOR RECLAIM

Rohr, Inc. is a NOx RECLAIM facility. This project will not affect NOx emissions at the facility since the spray booth does not emit NOx and the change of condition will not affect the NOx emissions. This rule is not applicable to this project.

REGULATION XXX: TITLE V

This facility is in the RECLAIM program. The proposed project is considered as a “minor permit revision” for non-RECLAIM pollutants or hazardous air pollutants (HAPs), and a “minor permit revision” for RECLAIM pollutants to the RECLAIM/Title V permit for this facility.

Non-RECLAIM Pollutants or HAPs

Rule 3000(b)(15) defines a “minor permit revision” as any Title V permit revision where the changes to the permit unit does not cause an emission increase in RECLAIM/non-RECLAIM pollutants or HAPs from these permit revisions during the term of the permit are not greater than any of the following emission threshold levels:

Air Contaminant	Daily Maximum (lbs/day)
HAP	30
VOC	30
NO _x *	40
PM ₁₀	30
SO _x *	60
CO	220

* Not applicable if this is a RECLAIM pollutant

To determine if a project is considered as a “minor permit revision” for RECLAIM/non-RECLAIM pollutants or HAPs, emission increases for non-RECLAIM pollutants or HAPs resulting from all permit revisions that are made after the issuance of the Title V renewal permit shall be accumulated and compared to the above threshold levels. This proposed project is the 2nd permit revision to the Title V renewal permit issued to this facility on July 6, 2010. The following table summarizes the cumulative emission increases resulting from all permit revisions since the Title V renewal permit was issued:

Revision	HAP	VOC	NO _x *	PM ₁₀	SO _x	CO
Previous permit Revisions.	0	0	0*	0	0	0
2 nd Permit Revision Application 527008						
Application no. 526999 - 527000: Functional Identical replacement of D42 & D30.						
Application no. 527001-527005: Demonstrate compliance with 1469.1.	0	0	0	0	0	0
Application no. 527006 – 527007: Modify D28 & D41 to add HEPA filters to the exhaust.						
Application no. 528002-003, 528005: to break-up D41 into 4 separate booths.						
Cumulative Total	0	0	0*	0	0	0
Maximum Daily	30	30	40*	30	60	220

* RECLAIM pollutant, not subject to emission accumulation requirements

+ Reduced emissions will not be subtracted from Cumulative Total

Since the cumulative emission increases resulting from all permit revisions are not greater than any of the emission threshold levels, this proposed project is considered as a “minor permit revision” for non-RECLAIM pollutants or HAPs.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING AND COMPLIANCE Coating, Printing and Aerospace Operations Team PERMIT APPLICATION EVALUATION	Page	17 of 17
	App. number(s)	526999-527008
	Processed by	Rene Loof
	Reviewed by	Hamed Mandilawi
	Date	11/04/11

RECLAIM Pollutants

Rule 3000(b)(12)(A)(v) defines a “minor permit revision” as any Title V permit revision that does not result in an emission increase of RECLAIM pollutants over the facility starting Allocation plus nontradeable Allocations, or higher Allocation amount which has previously undergone a significant permit revision process.

Since NOx is a RECLAIM pollutant for this facility, a separate analysis shall be made to determine if the proposed permit revision is considered a “minor permit revision” for RECLAIM pollutants. However, the change of permit condition will not result in an increase in NOx emissions. As a result, this proposed project is considered as a “minor permit revision” for RECLAIM pollutants.

RECOMMENDATION

The proposed project is expected to comply with all applicable District Rules and Regulations. Since the proposed project is considered as a “minor permit revision” for non-RECLAIM pollutants or hazardous air pollutants (HAPs), and a “minor permit revision” for RECLAIM pollutants, it is exempt from the public participation requirements under Rule 3006(b). A proposed permit incorporating this permit revision will be submitted to EPA for a 45-day review pursuant to Rule 3003(j). If EPA does not have any objections within the review period, a revised Title V/RECLAIM permit will be issued to this facility.