



South Coast Air Quality Management District

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

October 8, 2013

Mr. Gerardo Rios
Chief – Permit Office
US EPA, Region IX Air 3
75 Hawthorne Street
San Francisco, CA 94105

Dear Mr. Rios:

Subject: Transmittal of Proposed Title V Renewal Permit
TAMCO – I.D. No. 18931

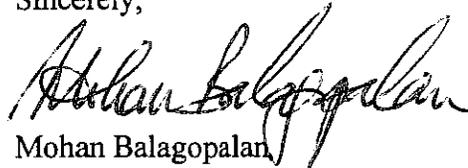
Enclosed are the proposed Title V renewal permit, permit summary, statement of basis, and public notice for TAMCO, located at 12459-B Arrow Route, Rancho Cucamonga, California 91739. Also incorporated into this draft permit are:

- Permits to construct a dustless spout on screw conveyor D6, vented to new baghouse C84, and modification to existing baghouse C5 by adding a hood and duct over a ladle stir station. The screw conveyor D6 is the discharge conveyor from baghouse C5, which will load railcars. Baghouse C84 will vent the screw conveyor feeding the railcars.
- Permits to construct two new cooling towers, D80 and D82
- Burner and stack modifications to reheat billet furnace D7, which includes, increasing the rating of the burners to a total of 143.5 MMBTU/hr (from 120.4 MMBTU/hr), and combining the two exhaust stacks to more effectively monitor emissions with the CEMS.
- Burner and stack modifications to ladle heaters D1, D2 and D3, which includes, increasing the rating of the ladle heater burners to 11.9 MMBTU/hr from 5 MMBTU/hr (D1), and to 16.4 MMBTU/hr from 5 MMBTU/hr (D2 and D3), relocation of the heaters within the melt shop, and additional ductwork to vent the heaters outside the building, to reduce the heat load in the melt shop.
- SO_x RECLAIM requirements

The changes noted above constitute a “de minimis significant” Title V permit revision, which will be incorporated into the Title V renewal permit. With your receipt of the proposed Title V renewal permit, we will note that EPA’s 45-day review period shall begin on October 8, 2013.

If you have any questions or comments concerning the proposed Title V renewal permit, please contact Mr. Richard Hawrylew, Air Quality Engineer, at (909) 396-2657, or you may contact him by email at rhawrylew@aqmd.gov.

Sincerely,



Mohan Balagopalan
Senior Manager
Chemical, Mechanical, and Ports Permitting

MB:DR

Enclosures: Proposed Title V Renewal Permit
Permit Summary
Statement of Basis
Public Notice
Permit modification evaluation

FACILITY PERMIT TO OPERATE

**TAMCO
12459-B ARROW ROUTE
RANCHO CUCAMONGA, CA 91739**

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 TAMCO

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FACILITY PERMIT TO OPERATE TAMCO

SECTION A: FACILITY INFORMATION

LEGAL OWNER &/OR OPERATOR: TAMCO

LEGAL OPERATOR (if different than owner):

EQUIPMENT LOCATION: 12459-B ARROW ROUTE
RANCHO CUCAMONGA, CA 91739-9601

MAILING ADDRESS: PO BOX 325
RANCHO CUCAMONGA, CA 91739-0325

RESPONSIBLE OFFICIAL: JAMES CROMPTON

TITLE: VICE PRESIDENT AND GENERAL MANAGER

TELEPHONE NUMBER: (909) 899-0660

CONTACT PERSON: JEFFREY DAMBRUN

TITLE: ENVIRONMENTAL MANAGER

TELEPHONE NUMBER: (909) 899-0660

TITLE V PERMIT ISSUED: June 03, 2008

TITLE V PERMIT EXPIRATION DATE: June 02, 2013

TITLE V	RECLAIM
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YES	NOx: YES SOx: YES CYCLE: 2 ZONE: INLAND
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FACILITY PERMIT TO OPERATE TAMCO

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		Zone	NOx RTC Initially Allocated	NOx RTC ¹ Holding as of 07/01/2013 (pounds)	Non-Tradable ² Non-Usable RTCs (pounds)
Begin (month/year)	End				
7/2010	6/2011	Inland	115749	43404	9376
7/2011	6/2012	Inland	115749	0	12501
1/2012	12/2012	Coastal	0	100000	0
7/2012	6/2013	Inland	115749	162455	12501
7/2013	6/2014	Inland	115749	68898	12501
7/2014	6/2015	Inland	115749	147455	12501
7/2015	6/2016	Inland	115749	147455	12501
7/2016	6/2017	Inland	115749	147455	12501
7/2017	6/2018	Inland	115749	147455	12501
7/2018	6/2019	Inland	115749	147455	12501
7/2019	6/2020	Inland	115749	147455	12501
7/2020	6/2021	Inland	115749	147455	12501
7/2021	6/2022	Inland	115749	147455	12501
7/2022	6/2023	Inland	115749	147455	12501
7/2023	6/2024	Inland	115749	147455	12501
7/2024	6/2025	Inland	115749	147455	12501
7/2025	6/2026	Inland	115749	147455	12501

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 TAMCO

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 07/01/2013 (pounds)	Non-Tradable ² Non-Usable RTCs (pounds)
7/2026 6/2027	Inland	115749	147455	12501
7/2027 6/2028	Inland	115749	147455	12501

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 TAMCO

SECTION B: RECLAIM ANNUAL EMISSION ALLOCATION

The annual allocation of SOx RECLAIM Trading Credits (RTCs) for this facility is calculated pursuant to Rule 2002. Total SOx 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	SOx RTC Initially Allocated	SOx RTC ¹ Holding as of 07/01/2013 (pounds)	Non-Tradable ² Credits (NTCs) (pounds)
7/2013 6/2014	Inland	100	100	
7/2014 6/2015	Inland	100	100	
7/2015 6/2016	Inland	100	100	
7/2016 6/2017	Inland	100	100	
7/2017 6/2018	Inland	100	100	
7/2018 6/2019	Inland	100	100	
7/2019 6/2020	Inland	100	100	
7/2020 6/2021	Inland	100	100	
7/2021 6/2022	Inland	100	100	
7/2022 6/2023	Inland	100	100	
7/2023 6/2024	Inland	100	100	
7/2024 6/2025	Inland	100	100	
7/2025 6/2026	Inland	100	100	
7/2026 6/2027	Inland	100	100	
7/2027 6/2028	Inland	100	100	

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 (h)(2) of Rule 2002.

FACILITY PERMIT TO OPERATE TAMCO

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	NOx RTC	Non-Tradable Credits(NTC)
Begin (month/year)	End		Starting Allocation (pounds)	
7/1994	6/1995	Inland	250211	0

FACILITY PERMIT TO OPERATE TAMCO

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	SOx RTC	Non-Tradable
Begin	End		Starting Allocation	Credits(NTC)
(month/year)			(pounds)	(pounds)
7/1994	6/1995	Inland	1635	0

**FACILITY PERMIT TO OPERATE
TAMCO**

SECTION C: FACILITY PLOT PLAN

(TO BE DEVELOPED)

FACILITY PERMIT TO OPERATE TAMCO

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: PRE-HEATING					
HEATER, LADLE, NATURAL GAS, WITH LOW NOX BURNER, 16.4 MMBTU/HR WITH A/N: BURNER, NATURAL GAS, NORTH AMERICAN, MODEL 4575-12 HIRAM, WITH LOW NOX BURNER, 1 TOTAL; 16.4 MMBTU/HR	D3	S91	NOX: LARGE SOURCE**	CO: 2000 PPMV (5A) [RULE 407, 4-2-1982]; NOX: 60 PPMV NATURAL GAS (4) [RULE 2005, 6-3-2011]; NOX: 60 PPMV NATURAL GAS (3) [RULE 2012, 5-6-2005]; PM: (9) [RULE 405, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]	C1.12, D28.3, D323.2
STACK, VENTED TO OUTSIDE ATMOSPHERE A/N:	S89	D1			
STACK, VENTED TO OUTSIDE ATMOSPHERE A/N:	S90	D2			
STACK, VENTED TO OUTSIDE ATMOSPHERE A/N:	S91	D3			
Process 2: METAL MELTING					

* (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 TAMCO

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 2: METAL MELTING					
FURNACE, ELECTRIC, ARC TYPE, SCRAP STEEL, 120 TON CAPACITY, 100000 KVA; 62.4 MMBTU/HR WITH A/N: 472953 BURNER, OXY-FUEL, AMERICAN COMBUSTION, MODEL 16-AMOPJ3774NE, WITH LOW NOX BURNER, 4 TOTAL; 15.6 MMBTU/HR	D4	C5	NOX: MAJOR SOURCE**; SOX: MAJOR SOURCE**	PM: (9) [RULE 405, 2-7-1986]; PM: 0.1 GRAINS/SCF OXY-FUEL (5) [RULE 407, 4-2-1982; RULE 409, 8-7-1981]; PM: 12 MG PER DSCM (8) [40CFR 60 Subpart AA, 2-22-2005]; PM: 2000 PPMV OXY-FUEL (5) [RULE 407, 4-2-1982; RULE 409, 8-7-1981]; SOX: 0.2 LBS/TON PRODUCED (1) [RULE 2011, 5-6-2005]	C1.2, C409.1, D12.3, D323.3, E71.4, E71.6, E448.3
BAGHOUSE, WHEELABRATOR, MODEL 264, 9 COMPARTMENTS, EACH WITH 29,256 SQ. FT. FILTER AREA, WITH AUBURN BAG LEAK DETECTION SYSTEM WITH A/N: TOWER, SPRAY, WITH 8 WATER SPRAY NOZZLES CONVEYOR, SCREW	C5 D67 D6	D4		PM: (9) [RULE 404, 2-7-1986] PM: (9) [RULE 405, 2-7-1986]	D12.4, D28.1, D322.1, D381.2, E71.2, E71.3, E193.1, E448.2, H23.3, K40.1, K67.2
Process 3: RE-HEATING					

* (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 TAMCO

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 3 RE HEATING					
FURNACE, BILLET REHEAT, NATURAL GAS, WITH LOW NOX BURNER, 143.5 MMBTU/HR WITH A/N: BURNER, REGENERATIVE, NATURAL GAS, NORTH AMERICAN MFG., MODEL 4315-10B, PREHEAT ZONE, WITH LOW NOX BURNER, 4 TOTAL; 14 MMBTU/HR BURNER, REGENERATIVE, NATURAL GAS, NORTH AMERICAN MFG., MODEL 4343-12B, PREHEAT ZONE, WITH LOW NOX BURNER, 4 TOTAL; 25 MMBTU/HR BURNER, REGENERATIVE, NATURAL GAS, NORTH AMERICAN MFG., MODEL 4315-10A, HEATING ZONE, WITH LOW NOX BURNER, 8 TOTAL; 11.2 MMBTU/HR BURNER, REGENERATIVE, NATURAL GAS, NORTH AMERICAN MFG., MODEL 4315-9, BOTTOM SOAK, WITH LOW NOX BURNER, 4 TOTAL; 5.7 MMBTU/HR	D7		NOX: MAJOR SOURCE**	CO: 2000 PPMV (5A) [RULE 407, 4-2-1982]; PM: (9) [RULE 404, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]	CI.3, CI.13, D12.1

* (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 TAMCO

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 3: RE-HEATING					
BURNER, REGENERATIVE, NATURAL GAS, NORTH AMERICAN MFG., MODEL 4315-8A, TOP SOAK, WITH LOW NOX BURNER, 6 TOTAL; 3.1 MMBTU/HR					
Process 4: MATERIAL STORAGE					
System 1: LIME STORAGE					
STORAGE SILO, 12,000 CUBIC FEET, LIME, WITH A FILTER VENT A/N:	D8			PM: (9) [RULE 404, 2-7-1986; RULE 405, 2-7-1986]	C1.10, D322.1, D323.2, D381.1, K67.2
HOPPER A/N:	D71	C73		PM: (9) [RULE 405, 2-7-1986]	D323.2
CONVEYOR, SCREW, WITH A DISCHARGE DUST COLLECTION SHROUD A/N:	D72	C73		PM: (9) [RULE 405, 2-7-1986]	D323.2
BAGHOUSE, DIVERSIFIED STORAGE SYSTEMS, MODEL WAM 250, WITH 14 CARTRIDGES, 250 SQ. FT. TOTAL FILTER AREA, AND A 5 HP BLOWER A/N:	C73	D71 D72		PM: (9) [RULE 404, 2-7-1986]	D12.4, D322.1, D381.1, E448.2, H23.3, K67.2
System 2: DOLOMITE RECEIVING AND STORAGE					
STORAGE SILO, DOLOMITE, 4,800 CU. FT., WITH FABRIC FILTER A/N: 458462	D46			PM: (9) [RULE 404, 2-7-1986; RULE 405, 2-7-1986]	C1.5, D322.1, D381.1, E184.1, K67.2
System 3: CARBON STORAGE AND INJECTION					

- * (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 TAMCO

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 4: MATERIAL STORAGE					
STORAGE SILO, CARBON, 1,400 CUBIC FEET, WITH A 50 HP PNEUMATIC CONVEYOR A/N:	D74			PM: (9) [RULE 405, 2-7-1986]	C1.11, D323.2
STORAGE SILO, CARBON, 2,250 CUBIC FEET, WITH A FILTER VENT, 225 SQ. FT. TOTAL FILTERING AREA A/N:	D75			PM: (9) [RULE 404, 2-7-1986; RULE 405, 2-7-1986]	D322.1, D323.2, D381.1, E184.1, K67.2
CONVEYOR, SCREW A/N:	D76			PM: (9) [RULE 405, 2-7-1986]	D323.2
CONVEYOR, SCREW A/N:	D77			PM: (9) [RULE 405, 2-7-1986]	D323.2
INJECTOR, CARBON A/N:	D78			PM: (9) [RULE 405, 2-7-1986]	D323.2
INJECTOR, CARBON A/N:	D79			PM: (9) [RULE 405, 2-7-1986]	D323.2
Process 6: FUEL STORAGE & DISPENSING					
STORAGE TANK, GASOLINE A/N: 489915	D14			ROG: (9) [RULE 461, Healy, Phase I and II EVR Conditions, 3-7-2008; RULE 461, Universal Conditions, 3-7-2008]	D330.1
FUEL DISPENSING NOZZLE, HEALY PHASE II EVR W/O ISD: VR-201, GASOLINE, WITH PHASE II VAPOR RECOVERY SYSTEM A/N: 489915	D15			ROG: (9) [RULE 461, Bellowsless Conditions, 3-7-2008; RULE 461, Healy, Phase I and II EVR Conditions, 3-7-2008; RULE 461, Universal Conditions, 3-7-2008]	D330.1
Process 7: INTERNAL COMBUSTION ENGINE					

- | | |
|---|---|
| <p>* (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</p> | <p>(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</p> |
|---|---|

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

FACILITY PERMIT TO OPERATE TAMCO

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 7: INTERNAL COMBUSTION ENGINE					
INTERNAL COMBUSTION ENGINE, EMERGENCY POWER, DIESEL FUEL, CUMMINS, MODEL NTA855-G1, WITH TURBOCHARGER, 425 BHP A/N: 316128	D37		NOX: PROCESS UNIT**; SOX: PROCESS UNIT**	NOX: 469 LBS/1000 GAL DIESEL (1) [RULE 2012, 5-6-2005]; PM: (9) [RULE 404, 2-7-1986]; SOX: 0.208 LBS/1000 GAL DIESEL (1) [RULE 2011, 5-6-2005]	D12.2, E448.1, E448.4, K67.4
INTERNAL COMBUSTION ENGINE, EMERGENCY POWER, DIESEL FUEL, DETROIT, MODEL 1063-7005, 189 BHP A/N: 316129	D39		NOX: PROCESS UNIT**; SOX: PROCESS UNIT**	NOX: 469 LBS/1000 GAL DIESEL (1) [RULE 2012, 5-6-2005]; PM: (9) [RULE 404, 2-7-1986]; SOX: 0.208 LBS/1000 GAL DIESEL (1) [RULE 2011, 5-6-2005]	D12.2, E448.1, E448.4, K67.4
INTERNAL COMBUSTION ENGINE, EMERGENCY POWER, DIESEL FUEL, DETROIT DIESEL, MODEL 1063-7305, WITH AFTERCOOLER, TURBOCHARGER, 330 BHP A/N: 328590	D41		NOX: PROCESS UNIT**; SOX: PROCESS UNIT**	NOX: 469 LBS/1000 GAL DIESEL (1) [RULE 2012, 5-6-2005]; PM: (9) [RULE 404, 2-7-1986]; SOX: 0.208 LBS/1000 GAL DIESEL (1) [RULE 2011, 5-6-2005]	D12.2, E448.1, E448.4, K67.4
INTERNAL COMBUSTION ENGINE, EMERGENCY POWER, RICH BURN, NATURAL GAS, CUMMINS, MODEL GV12-525-IPG, 400 BHP A/N: 443929	D45		NOX: PROCESS UNIT**; SOX: PROCESS UNIT**	CO: 2 GRAM/BHP-HR NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]; NOX: 1.5 GRAM/BHP-HR NATURAL GAS (1) [RULE 2012, 5-6-2005]; NOX: 1.5 GRAM/BHP-HR NATURAL GAS (4) [RULE 2005, 5-6-2005]; PM: (9) [RULE 404, 2-7-1986]; ROG: 1.5 GRAM/BHP-HR NATURAL GAS (4) [RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]	D12.2, E115.1, E448.1, E448.4, K67.4
Process 8: R-219 EXEMPT EQUIPMENT SUBJECT TO SOURCE-SPECIFIC RULES					

* (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 TAMCO

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 8: R-219 EXEMPT EQUIPMENT SUBJECT TO SOURCE-SPECIFIC RULES					
RULE 219 EXEMPT EQUIPMENT, COATING EQUIPMENT, PORTABLE, ARCHITECTURAL COATINGS	E43			ROG: (9) [RULE 1113, 7-13-2007; RULE 1113, 6-3-2011; RULE 1171, 2-1-2008; RULE 1171, 5-1-2009]	K67.3
RULE 219 EXEMPT EQUIPMENT, REFRIGERATION UNITS	E51				H23.2
RULE 219 EXEMPT EQUIPMENT, REFRIGERANT RECOVERY AND/OR RECYCLING UNITS,	E52				H23.2

- * (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 TAMCO

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 TAMCO

SECTION D: DEVICE ID INDEX

Device Index For Section D			
Device ID	Section D Page No.	Process	System
D1	1	1	0
D2	1	1	0
D3	2	1	0
D4	3	2	0
C5	3	2	0
D6	3	2	0
D7	5	3	0
D8	5	4	1
D14	6	6	0
D15	6	6	0
D37	7	7	0
D39	7	7	0
D41	7	7	0
E43	8	8	0
D45	7	7	0
D46	5	4	2
E51	8	8	0
E52	8	8	0
D67	3	2	0
D71	5	4	1
D72	5	4	1
C73	5	4	1
D74	6	4	3
D75	6	4	3
D76	6	4	3
D77	6	4	3
D78	6	4	3
D79	6	4	3
S89	2	1	0
S90	2	1	0
S91	2	1	0

FACILITY PERMIT TO OPERATE TAMCO

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

FACILITY CONDITIONS

F5.1 The following conditions shall apply to operations with lead containing materials and housekeeping practices for fugitive lead-dust emissions at this facility:

Dust-forming material which may contain lead, including but not limited to baghouse dust, dross, ash, or feed material, shall be stored in closed containers in enclosed storage areas

Surfaces upon which lead-containing dust accumulates and which are subject to vehicular or foot traffic shall be either washed down, vacuum-cleaned, or wet-mopped at least once a week, or shall be maintained with the use of non-toxic chemical dust suppressants

Lead or lead-containing wastes generated from housekeeping activities shall be stored, disposed of, recovered, or recycled using practices that do not lead to fugitive lead-dust emissions

Records of the quantities of each lead-containing material processed, and the lead content of the material shall be maintained. The records shall include but not limited to purchase records, usage records, results of analysis or other verification to indicate lead content and lead usage. The records shall be kept for at least the last five years, and made available to District personnel upon request

Records of housekeeping activities, and inspection and maintenance of emission collection system(s) and control device(s) shall be maintained. The records shall include the name of the person performing the activity, description of the activity, and the dates on which the specific activity was completed. The records shall be kept for at least the last five years, and made available to District personnel upon request

[RULE 1420, 9-11-1992]

FACILITY PERMIT TO OPERATE TAMCO

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

F9.1 Except for open abrasive blasting operations, the operator shall not discharge into the atmosphere from any single source of emissions whatsoever 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 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 subparagraph (a) of this condition.

[RULE 401, 3-2-1984; RULE 401, 11-9-2001]

F14.1 The operator shall not purchase diesel fuel containing sulfur compounds in excess of 15 ppm by weight as supplied by the supplier.

[RULE 431.2, 5-4-1990; RULE 431.2, 9-15-2000; 40CFR 63SubpartZZZZ, 3-9-2011]

F14.2 The operator shall not use fuel oil containing sulfur compounds in excess of 0.05 percent by weight.

[RULE 431.2, 5-4-1990; RULE 431.2, 9-15-2000]

DEVICE CONDITIONS

A. Emission Limits

A63.1 The operator shall limit emissions from this equipment as follows:

CONTAMINANT	EMISSIONS LIMIT	AMOUNT	UNITS
T			

FACILITY PERMIT TO OPERATE TAMCO

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

PM10 | Less than or equal to | 7260 | LBS IN ANY
CALENDAR MONTH

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

[Devices subject to this condition : D1]

C. Throughput or Operating Parameter Limits

C1.2 The operator shall limit the material processed to no more than 51210 ton(s) in any one calendar month.

For the purpose of this condition, material processed shall be defined as scrap metal.

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

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

[Devices subject to this condition : D4]

C1.3 The operator shall limit the natural gas fuel usage to no more than 2.2 MM cubic feet per day.

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

[Devices subject to this condition : D7]

C1.5 The operator shall limit the throughput to no more than 2100 ton(s) in any one calendar month.

FACILITY PERMIT TO OPERATE TAMCO

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

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

[Devices subject to this condition : D46]

C1.10 The operator shall limit the throughput to no more than 2260 ton(s) in any one calendar month.

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

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

[Devices subject to this condition : D8]

C1.11 The operator shall limit the throughput to no more than 1410 ton(s) in any one calendar month.

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

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

[Devices subject to this condition : D74]

C1.12 The operator shall limit the natural gas fuel usage to no more than 18 MM cubic feet in any one calendar month.

This limit shall be based on the total combined limit for equipment D1, D2 and D3.

[RULE 1304(c)-Offset Exemption, 6-14-1996]

[Devices subject to this condition : D1, D2, D3]

FACILITY PERMIT TO OPERATE TAMCO

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

C1.13 The operator shall limit the natural gas fuel usage to no more than 114667 cubic feet per hour.

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

[Devices subject to this condition : D7]

C409.1 The operator shall ensure that oil filters used in this equipment shall meet the following specified requirements:

The amount of oil filters used shall not exceed 750 tons in any one calendar month.

Oil filters shall be drained and crushed prior to being used in this equipment.

Records on the amount of oil filters used shall be maintained, in a manner approved by the District, to demonstrate compliance with this condition.

[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 : D4]

D. Monitoring/Testing Requirements

D12.1 The operator shall install and maintain a(n) non-resettable totalizing fuel meter to accurately indicate the fuel usage of the billet heating furnace.

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

[Devices subject to this condition : D7]

FACILITY PERMIT TO OPERATE TAMCO

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

D12.2 The operator shall install and maintain a(n) timer to accurately indicate the elapsed operating time of the engine.

[RULE 1110.2, 2-1-2008; RULE 1110.2, 9-7-2012; RULE 1304(a)-Modeling and Offset Exemption, 6-14-1996; RULE 2012, 5-6-2005; 40CFR 63SubpartZZZ, 3-9-2011]

[Devices subject to this condition : D37, D39, D41, D45]

D12.3 The operator shall install and maintain a(n) temperature gauge to accurately indicate the temperature at the exit of the water cooled elbow in the exhaust system.

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

[Devices subject to this condition : D4]

D12.4 The operator shall install and maintain a(n) differential pressure gauge to accurately indicate the differential pressure across the the filter bags.

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

[Devices subject to this condition : C5, C73]

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

FACILITY PERMIT TO OPERATE TAMCO

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

The test shall be conducted at least once during the life of the permit.

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

The test shall be conducted to determine the PM emissions using EPA method 5D measured over a 60 minute averaging time period.

Source test shall be conducted when this equipment is operating at maximum load.

The District shall be notified of the date and time of the test at least 14 days prior to the test.

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

[Devices subject to this condition : C5]

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

The test shall be conducted to determine lead emissions to outside atmosphere.

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

[RULE 1420, 9-11-1992]

[Devices subject to this condition : D1, D2, D3]

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]

FACILITY PERMIT TO OPERATE TAMCO

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 : C5, D8, D46, C73, D75]

FACILITY PERMIT TO OPERATE TAMCO

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

D323.2 The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on an annual basis, at least, unless the equipment did not operate during the entire annual period. The routine annual inspection shall be conducted while the equipment is in operation and during daylight hours.

If any visible emissions (not including condensed water vapor) are detected that last more than three minutes in any one hour, the operator shall verify and certify within 24 hours that the equipment causing the emission and any associated air pollution control equipment are operating normally according to their design and standard procedures and under the same conditions under which compliance was achieved in the past, and either:

- 1). Take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit; or
- 2). Have a CARB-certified smoke reader determine compliance with the opacity standard, using EPA Method 9 or the procedures in the CARB manual "Visible Emission Evaluation", within three business days and report any deviations to AQMD.

The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

- 1). Stack or emission point identification;
- 2). Description of any corrective actions taken to abate visible emissions;
- 3). Date and time visible emission was abated; and
- 4). All visible emission observation records by operator or a certified smoke reader.

FACILITY PERMIT TO OPERATE TAMCO

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

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

[Devices subject to this condition : D1, D2, D3, D8, D71, D72, D74, D75, D76, D77,
D78, D79]

FACILITY PERMIT TO OPERATE TAMCO

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

D323.3 The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on a semi-annual basis, at least, unless the equipment did not operate during the entire semi-annual period. The routine semi-annual inspection shall be conducted while the equipment is in operation and during daylight hours.

If any visible emissions (not including condensed water vapor) are detected that last more than three minutes in any one hour, the operator shall verify and certify within 24 hours that the equipment causing the emission and any associated air pollution control equipment are operating normally according to their design and standard procedures and under the same conditions under which compliance was achieved in the past, and either:

- 1). Take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit; or
- 2). Have a CARB-certified smoke reader determine compliance with the opacity standard, using EPA Method 9 or the procedures in the CARB manual "Visible Emission Evaluation", within three business days and report any deviations to AQMD.

The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

- 1). Stack or emission point identification;
- 2). Description of any corrective actions taken to abate visible emissions;
- 3). Date and time visible emission was abated; and
- 4). All visible emission observation records by operator or a certified smoke reader.

FACILITY PERMIT TO OPERATE TAMCO

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

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

[Devices subject to this condition : D4]

D330.1 The operator shall have a person that has been trained in accordance with Rule 461 conduct a semi-annual inspection of the gasoline transfer and dispensing equipment. The first inspection shall be in accordance with Rule 461, Attachment B, the second inspection shall be in accordance with Rule 461, Attachment C, and the subsequent inspections shall alternate protocols. The operator shall keep records of the inspection and the repairs in accordance to Rule 461 and Section K of this Permit.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997; RULE 461, 6-3-2005; RULE 461, 3-7-2008]

[Devices subject to this condition : D14, D15]

FACILITY PERMIT TO OPERATE TAMCO

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

D381.1 The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on a weekly basis, at least, unless the equipment did not operate during the entire weekly period. The routine weekly inspection shall be conducted while the equipment is in operation and during daylight hours. If any visible emissions (not including condensed water vapor) are detected, the operator shall take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit.

The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

- 1). Stack or emission point identification;
- 2). Description of any corrective actions taken to abate visible emissions; and
- 3). Date and time visible emission was abated.

[RULE 1155, 12-4-2009; **RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997**]

[Devices subject to this condition : D8, D46, C73, D75]

FACILITY PERMIT TO OPERATE TAMCO

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

D381.2 The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on a quarterly basis, at least, unless the equipment did not operate during the entire quarterly period. The routine quarterly inspection shall be conducted while the equipment is in operation and during daylight hours. If any visible emissions (not including condensed water vapor) are detected, the operator shall take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit.

The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

- 1). Stack or emission point identification;
- 2). Description of any corrective actions taken to abate visible emissions; and
- 3). Date and time visible emission was abated.

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

[Devices subject to this condition : C5]

E. Equipment Operation/Construction Requirements

E71.2 The operator shall not operate this equipment if the opacity of the exhaust gases from the baghouse is 3 percent or greater based on the arithmetic average of 24 consecutive 15-second opacity observations taken in accordance with USEPA Method 9.

[40CFR 60 Subpart AAa, 2-22-2005]

[Devices subject to this condition : C5]

FACILITY PERMIT TO OPERATE TAMCO

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

- E71.3 The operator shall not operate this equipment if the opacity of the gases from the screw conveyor is 10 percent or greater based on the arithmetic average of 24 consecutive 15-second opacity observations taken in accordance with USEPA Method 9.

[40CFR 60 Subpart AAa, 2-22-2005]

[Devices subject to this condition : C5]

- E71.4 The operator shall only charge drained and crushed oil filters to this equipment during the portion of the operation which produces the maximum temperature at the exit of the water cooled elbow.

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

[Devices subject to this condition : D4]

- E71.6 The operator shall not operate this equipment if the opacity of the gases from the furnace building is 6 percent or greater based on the arithmetic average of 24 consecutive 15-second opacity observations taken in accordance with USEPA Method 9.

[40CFR 63 Subpart YYYYYY, 12-28-2007]

[Devices subject to this condition : D4]

- E115.1 The operator shall maintain an automatic air-to-fuel ratio controller so as to regulate the air-to-fuel ratio within tolerance limits as recommended by the catalyst supplier or manufacturer.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 2005, 6-3-2011; 40CFR 63SubpartZZZZ, 3-9-2011]

FACILITY PERMIT TO OPERATE TAMCO

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 : D45]

E184.1 The operator shall thoroughly clean the filters in the filter vents immediately after each load of material is received.

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

[Devices subject to this condition : D46, D75]

E193.1 The operator shall operate and maintain this equipment according to the following requirements:

FACILITY PERMIT TO OPERATE TAMCO

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

The baghouse pressure differential across the filter bags shall be maintained between 4" and 20" of water column whenever the equipment it serves is in operation.

The operator shall operate and maintain a pressure differential gauge to measure and indicate the pressure differential across the baghouse filter bags pursuant to the operation and maintenance requirements in 40 CFR Part 64.7. The pressure differential across the filters shall be recorded continuously.

For the purpose of this condition, a deviation shall be defined as when the pressure differential across the filters is less than 4" of water column or more than 20" of water column occurs during the normal operation of the equipment it serves.

Whenever a deviation occurs, the operator shall inspect this equipment to identify the cause of such a deviation, take immediate corrective action to maintain the pressure differential across the filters between 4" and 20" of water column, and keep records of the duration and cause (including unknown cause, if applicable) of the deviation and the corrective actions taken.

All deviations shall be reported to the AQMD on a semi-annual basis pursuant to the requirements specified in 40 CFR Part 64.9 and Condition Nos. 22 and 23 in Section K of this permit. The semi-annual monitoring report shall include the total operating time of this equipment and the total accumulated duration of all deviations for each semi-annual reporting period specified in Condition No. 23 in Section K of this permit.

The operator shall submit an application with an Quality Improvement Plan (QIP) in accordance with 40 CFR Part 64.8 to the AQMD if more than six deviations occur in any semi-annual reporting period specified in Condition No. 23 in Section K of this permit. The required QIP shall be submitted to the AQMD within 90 calendar days after the due date for the semi-annual monitoring report.

The operator shall inspect and maintain all components of this equipment on an annual basis in accordance with the manufacturer's specifications.

The operator shall keep adequate records in a format that is acceptable to the AQMD

FACILITY PERMIT TO OPERATE TAMCO

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

to demonstrate compliance with all applicable requirements specified in this condition and 40 CFR Part 64.9 for a minimum of five years.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997; 40CFR Part 64, 10-22-1997]

[Devices subject to this condition : C5]

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

The engine shall not be operated more than 200 hours in any one year, which includes no more than 50 hours in any one year for maintenance and testing.

Operation beyond the 50 hours per year allotted for engine maintenance and testing shall be allowed only in the event of a loss of grid power or up to 30 minutes prior to a rotating outage, provided that the utility distribution company has ordered rotating outages in the control area where the engine is located or has indicated that it expects to issue such an order at a certain time, and the engine is located in a utility service block that is subject to the rotating outage.

Engine operation shall be terminated immediately after the utility distribution company advises that a rotating outage is no longer imminent or in effect.

This engine shall not be used as part of an interruptible service contract in which a facility receives a payment or reduced rates in return for reducing electric load on the grid when requested to so by the utility or the grid operator.

[RULE 1110.2, 2-1-2008; RULE 1110.2, 9-7-2012; RULE 1304(a)-Modeling and Offset Exemption, 6-14-1996; RULE 1470, 5-4-2012; 40CFR 63SubpartZZZZ_01, 3-9-2011]

[Devices subject to this condition : D37, D39, D41, D45]

E448.2 The operator shall comply with the following requirements:

FACILITY PERMIT TO OPERATE TAMCO

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

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

[Devices subject to this condition : C5, C73]

E448.3 The operator shall comply with the following requirements:

The operator shall only purchase motor scrap from scrap providers who participate in an EPA approved program for removal of mercury switches.

[40CFR 63 Subpart YYYYYY, 12-28-2007]

[Devices subject to this condition : D4]

E448.4 The operator shall comply with the following requirements:

Change oil and filter (or according to the oil analysis program in 40 CFR 63.6625(J)), and inspect hoses and belts annually

Inspect air cleaner (compression ignition) or spark plugs (spark ignition) annually.

Records shall be maintained according to 40 CFR 63.6655(A) and (E). All records required by these devices shall be retained for a minimum of five years, and shall be made available to any District representative upon request.

Per 40 CFR 63.556625(E) and 63.6640(A), the operator shall maintain the engine and control device (if any) according to the manufacturer's instructions or owner-developed maintenance plan

FACILITY PERMIT TO OPERATE TAMCO

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

[40CFR 63SubpartZZZZ, 3-9-2011]

[Devices subject to this condition : D37, D39, D41, D45]

H. Applicable Rules

H23.2 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
Refrigerants	District Rule	1411
Refrigerants	District Rule	1415
Refrigerants	40CFR82, SUBPART	B
Refrigerants	40CFR82, SUBPART	F

[RULE 1411, 3-1-1991; RULE 1415, 12-3-2010; 40CFR 82 Subpart B, 7-14-1992;
40CFR 82 Subpart F, 5-14-1993]

[Devices subject to this condition : E51, E52]

H23.3 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
PM	District Rule	1155

[RULE 1155, 12-4-2009]

[Devices subject to this condition : C5, C73]

FACILITY PERMIT TO OPERATE TAMCO

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

K. Record Keeping/Reporting

K40.1 The operator shall provide to the District a source test report in accordance with the following specifications:

Source test results shall be submitted to the District no later than 60 days after the source test was conducted.

Emission data shall be expressed in terms of mass rate (lbs/hr). In addition, solid PM emissions, if required to be tested, shall also be reported in terms of grains per DSCF.

All exhaust flow rate shall be expressed in terms of dry standard cubic feet per minute (DSCFM) and dry actual cubic feet per minute (DACFM).

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

[Devices subject to this condition : C5]

K67.2 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 : C5, D8, D46, C73, D75]

FACILITY PERMIT TO OPERATE TAMCO

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):

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 : E43]

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

The engine operating log shall be kept and maintained on file to record when the engine is started manually. The log shall list the date of operation, the timer reading in hours at the beginning and end of operation, and the reason for operation.

By January 15th of each year, the operator shall total and record the total hours of operation (including hours for both manual and automatic operation) for the previous calendar year.

The records shall be maintained on file for at least the last five years, and made available to District personnel upon request.

FACILITY PERMIT TO OPERATE TAMCO

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

**[RULE 1110.2, 2-1-2008; RULE 1110.2, 9-7-2012; RULE 1304(a)-Modeling and Offset
Exemption, 6-14-1996; RULE 1470, 5-4-2012]**

[Devices subject to this condition : D37, D39, D41, D45]

FACILITY PERMIT TO OPERATE TAMCO

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 TAMCO

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 TAMCO

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 TAMCO

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 TAMCO

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 TAMCO

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. NO_x Monitoring Conditions

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

1. Install, maintain, and operate an AQMD certified direct or time-shared monitoring device or an approved alternative monitoring device for each major NO_x source to continuously measure the concentration of NO_x emissions and all other applicable variables specified in Rule 2012, Table 2012-1 and Rule 2012, Appendix A, Table 2-A to determine the NO_x emissions rate from each source. The time-sharing of CEMS among NO_x sources may be allowed by the Executive Officer in accordance with the requirements for time sharing specified in Appendix A. [2012]
2. Install, maintain, and operate a totalizing fuel meter approved by the Executive Officer for each major source. [2012]
3. If the facility is operating existing CEMS and fuel meters, continue to follow recording and reporting procedures required by AQMD Rules and Regulations in effect prior to October 15, 1993 until the CEMS is certified pursuant to Rule 2012. [2012]
4. Use valid data collected by an AQMD certified or provisionally certified CEMS in proper operation that meets all the requirements of Appendix A of Rule 2012, unless final certification of the CEMS is denied, to determine mass emissions for all purposes, including, but not limited to, determining: [2012]
 - a. compliance with the annual Allocation;
 - b. excess emissions;
 - c. the amount of penalties; and
 - d. fees.

FACILITY PERMIT TO OPERATE TAMCO

SECTION F: RECLAIM MONITORING AND SOURCE TESTING REQUIREMENTS

5. Follow missing data procedures as specified in Rule 2012 Appendix A whenever valid data is not available or collected to determine mass emissions for all purposes, including, but not limited to, determining: [2012]
 - a. compliance with the annual Allocation;
 - b. excess emissions;
 - c. the amount of penalties; and
 - d. fees.

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

1. Install, maintain, and operate a totalizing fuel meter and any device specified by the Executive Officer as necessary to determine monthly fuel usage or other applicable variables specified in Rule 2012, Appendix A, Table 3-A. The sharing of totalizing fuel meter may be allowed by the Executive Officer if the fuel meter serves large sources which have the same emission factor, concentration limit, or emission rate. The sharing of totalizing fuel meters shall not be allowed for large sources which are required to comply with an annual heat input limit. [2012]
2. Comply at all times with the specified NO_x concentration limit in PPM measured over any continuous 60 minutes for that source or establish an equipment-specific emission rate that is reliable, accurate, representative of that sources emissions, and in accordance with the requirements specified in Rule 2012, Appendix A, Chapter 5. [2012]

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

FACILITY PERMIT TO OPERATE TAMCO

SECTION F: RECLAIM MONITORING AND SOURCE TESTING REQUIREMENTS

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]
2. The operator shall, as applicable, conduct source tests for every large NOx source no later than June 30, 1997 and every 3 years thereafter. The source test shall include the determination of NOx 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 NOx large sources and NOx process units shall be tuned-up in accordance with the schedule specified in Rule 2012, Appendix A, Chapter 5, Table 5-B. [2012]

III. SOx monitoring conditions

- D. The Operator of a SOx Major Source, as defined in Rule 2011, shall, as applicable:

FACILITY PERMIT TO OPERATE TAMCO

SECTION F: RECLAIM MONITORING AND SOURCE TESTING REQUIREMENTS

1. Install, maintain, and operate an AQMD certified direct or time-shared monitoring device or an approved alternative monitoring device for each major SOx source to continuously measure the concentration of SOx emissions or fuel sulfur content and all other applicable variables specified in Rule 2011, Table 2011-1 and Rule 2011, Appendix A, Table 2-A to determine the SOx emissions rate from each source. The time-sharing of CEMS among SOx sources may be allowed by the Executive Officer in accordance with the requirements for time sharing specified in Appendix A. [2011]
2. Install, maintain, and operate totalizing fuel meter approved by the Executive Officer for each major source. [2011]
3. If the facility is operating existing CEMS and fuel meters, continue to follow recording and reporting procedures required by AQMD Rules and Regulations in effect prior to October 15, 1993 until the CEMS is certified pursuant to Rule 2011. [2011]
4. Use valid data collected by an AQMD certified or provisionally certified CEMS in proper operation that meets all the requirements of Appendix A of Rule 2011, unless final certification of the CEMS is denied, to determine mass emissions for all purposes, including, but not limited to, determining: [2011]
 - a. compliance with the annual Allocation;
 - b. excess emissions;
 - c. the amount of penalties; and
 - d. fees.
5. Follow missing data procedures as specified in Rule 2011 Appendix A whenever valid data is not available or collected to determine mass emissions for all purposes, including, but not limited to, determining: [2011]
 - a. compliance with the annual Allocation;

FACILITY PERMIT TO OPERATE TAMCO

SECTION F: RECLAIM MONITORING AND SOURCE TESTING REQUIREMENTS

- b. excess emissions;
- c. the amount of penalties; and
- d. fees.

E. The Operator of a SO_x Process Unit, as defined in Rule 2011, 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 2011, Table 2011-1, and Rule 2011, Appendix A, Table 3-A. The sharing of totalizing meters shall be allowed for process units except those using fuels with different sulfur contents. [2011]

IV. SO_x Source Testing Conditions

- 1. The operator shall conduct all required SO_x source testing in compliance with an AQMD-approved source test protocol. [2011]

FACILITY PERMIT TO OPERATE TAMCO

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:

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SECTION G: RECORDKEEPING AND REPORTING REQUIREMENTS FOR RECLAIM SOURCES

1. No later than 12 months after entry into the RECLAIM program or after the initial operation of a new major source, whichever is later, install, maintain, and operate a reporting device to electronically report everyday to the AQMD central station for each major NOx source, the total daily mass emissions of NOx and daily status codes. Such data shall be transmitted by 5:00 p.m. of the following day. If the facility experiences a power, computer, or other system failure that prevents the submittal of the daily report, the Facility Permit holder shall be granted 24 hours extension to submit the report. [2012]
2. Calculate NOx emissions pursuant to missing data procedures set forth in Appendix A, Chapter 2 of Rule 2012 if the Facility Permit holder fails to meet the deadline for submitting the daily report. [2012]
3. Submit an electronic report within 15 days following the end of each month totaling NOx emissions from all major NOx sources during the month. [2012]
4. For those facilities with existing CEMS and fuel meters as of October 15, 1993, continue to follow recording and reporting procedures required by AQMD Rules and Regulations in effect until the CEMS is certified pursuant to Rule 2011 and/or Rule 2012, as applicable. [2012]

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

1. Install, maintain and operate a modem or any reporting device approved by the Executive Officer to report, to the AQMD, the total monthly NOx mass emissions from each large NOx source. The Operator shall comply with this requirement within 12 months of the date of entry to the RECLAIM Program. Such data shall be reported within 15 days after the end of each calendar month. [2012]

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

FACILITY PERMIT TO OPERATE TAMCO

SECTION G: RECORDKEEPING AND REPORTING REQUIREMENTS FOR RECLAIM SOURCES

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

SO_x Reporting Requirements

D. The Operator of a SO_x Major Source, as defined in Rule 2011, shall, as applicable:

1. No later than 12 months after entry into the RECLAIM program or after the initial operation of a new major source, whichever is later, install, maintain, and operate a reporting device to electronically report everyday to the AQMD central station for each major SO_x source, the total daily mass emissions of SO_x and daily status codes. Such data shall be transmitted by 5:00 p.m. of the following day. If the facility experiences a power, computer, or other system failure that prevents the submittal of the daily report, the Facility Permit holder shall be granted 24 hours extension to submit the report. [2011]
2. Calculate SO_x emissions pursuant to missing data procedures set forth in Appendix A, Chapter 2 of Rule 2011 if the Facility Permit holder fails to meet the deadline for submitting the daily report. [2011]
3. Submit an electronic report within 15 days following the end of each month totaling SO_x emissions from all major SO_x sources during the month. [2011]
4. For those facilities with existing CEMS and fuel meters as of October 15, 1993, continue to follow recording and reporting procedures required by AQMD Rules and Regulations in effect until the CEMS is certified pursuant to Rule 2011 and/or Rule 2012, as applicable. [2011]

E. The Operator of a SO_x Process Unit, as defined in Rule 2011, shall:

FACILITY PERMIT TO OPERATE TAMCO

SECTION G: RECORDKEEPING AND REPORTING REQUIREMENTS FOR RECLAIM SOURCES

1. Electronically report the calculated quarterly SO_x emissions for each SO_x process unit. [2011]

FACILITY PERMIT TO OPERATE TAMCO

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 2: METAL MELTING					
BAGHOUSE, WHEELABRATOR, MODEL 264, 9 COMPARTMENTS, EACH WITH 29,256 SQ. FT. FILTER AREA, WITH AUBURN BAG LEAK DETECTION SYSTEM WITH A/N:	C5	D4 E85		PM: (9) [RULE 404, 2-7-1986]	D12.4, D28.1, D322.1, D381.2, E71.2, E71.3, E193.1, E448.2, H23.3, K40.1, K67.2
CONVEYOR, SCREW, WITH DUSTLESS LOADING SPOUT	D6	C84		PM: (9) [RULE 405, 2-7-1986]	
TOWER, SPRAY, WITH 8 WATER SPRAY NOZZLES	D67				
BAGHOUSE, DCL, MODEL DC49-58, WITH FABRIC FILTER, 358 SQ.FT.; 49 BAGS A/N:	C84	D6		PM10: (9) [RULE 404, 2-7-1986]	D12.4, D322.1, D381.1, E448.2, H23.3, K67.2
Process 3: RE-HEATING					
STACK, COMBINED WITH A/N:	S86	D7			D232.1
STACK, MAIN, BURNER EXHAUST	S87				
STACK, FURNACE DAMPER	S88				
Process 8: R-219 EXEMPT EQUIPMENT SUBJECT TO SOURCE-SPECIFIC RULES					
MIXER, LADLE STIR STATION	E85	C5			
Process 9: COOLING TOWERS					
System 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 TAMCO

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 9: COOLING TOWERS					
COOLING TOWER, NO. 3, 2400 GPM WITH A/N: MIST ELIMINATOR, BRENTWOOD ACU-PAC, MODEL CF80MAX	D80				B59.1, E71.8
COOLING TOWER, NO. 6, 3700 GPM WITH A/N: MIST ELIMINATOR, BRENTWOOD ACU-PAC, MODEL CF80MAX	D82				B59.1, E71.8

- * (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 TAMCO

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 TAMCO

SECTION H: DEVICE ID INDEX

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E85	1	8	0
S86	1	3	0
S87	1	3	0
S88	1	3	0

FACILITY PERMIT TO OPERATE TAMCO

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

FACILITY CONDITIONS

F5.1 The following conditions shall apply to operations with lead containing materials and housekeeping practices for fugitive lead-dust emissions at this facility:

Dust-forming material which may contain lead, including but not limited to baghouse dust, dross, ash, or feed material, shall be stored in closed containers in enclosed storage areas

Surfaces upon which lead-containing dust accumulates and which are subject to vehicular or foot traffic shall be either washed down, vacuum-cleaned, or wet-mopped at least once a week, or shall be maintained with the use of non-toxic chemical dust suppressants

Lead or lead-containing wastes generated from housekeeping activities shall be stored, disposed of, recovered, or recycled using practices that do not lead to fugitive lead-dust emissions

Records of the quantities of each lead-containing material processed, and the lead content of the material shall be maintained. The records shall include but not limited to purchase records, usage records, results of analysis or other verification to indicate lead content and lead usage. The records shall be kept for at least the last five years, and made available to District personnel upon request

Records of housekeeping activities, and inspection and maintenance of emission collection system(s) and control device(s) shall be maintained. The records shall include the name of the person performing the activity, description of the activity, and the dates on which the specific activity was completed. The records shall be kept for at least the last five years, and made available to District personnel upon request

[RULE 1420, 9-11-1992]

FACILITY PERMIT TO OPERATE TAMCO

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

F9.1 Except for open abrasive blasting operations, the operator shall not discharge into the atmosphere from any single source of emissions whatsoever 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 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 subparagraph (a) of this condition.

[RULE 401, 3-2-1984; RULE 401, 11-9-2001]

F14.1 The operator shall not purchase diesel fuel containing sulfur compounds in excess of 15 ppm by weight as supplied by the supplier.

[RULE 431.2, 5-4-1990; RULE 431.2, 9-15-2000; 40CFR 63SubpartZZZZ, 3-9-2011]

F14.2 The operator shall not use fuel oil containing sulfur compounds in excess of 0.05 percent by weight.

[RULE 431.2, 5-4-1990; RULE 431.2, 9-15-2000]

DEVICE CONDITIONS

B. Material/Fuel Type Limits

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

hexavalent chromium containing water treatment chemicals

[RULE 1404, 4-6-1990]

[Devices subject to this condition : D80, D82]

D. Monitoring/Testing Requirements

FACILITY PERMIT TO OPERATE TAMCO

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

D12.4 The operator shall install and maintain a(n) differential pressure gauge to accurately indicate the differential pressure across the the filter bags.

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

[Devices subject to this condition : C5, C84]

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

The test shall be conducted at least once during the life of the permit.

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

The test shall be conducted to determine the PM emissions using EPA method 5D measured over a 60 minute averaging time period.

Source test shall be conducted when this equipment is operating at maximum load.

The District shall be notified of the date and time of the test at least 14 days prior to the test.

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

[Devices subject to this condition : C5]

D232.1 The operator shall install and maintain a continuous emission monitoring device to accurately indicate the NOx concentration at the outlet.

[**RULE 2012, 5-6-2005**]

[Devices subject to this condition : S86]

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**]

FACILITY PERMIT TO OPERATE TAMCO

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

[Devices subject to this condition : C5, C84]

D381.1 The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on a weekly basis, at least, unless the equipment did not operate during the entire weekly period. The routine weekly inspection shall be conducted while the equipment is in operation and during daylight hours. If any visible emissions (not including condensed water vapor) are detected, the operator shall take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit.

The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

- 1). Stack or emission point identification;
- 2). Description of any corrective actions taken to abate visible emissions; and
- 3). Date and time visible emission was abated.

[RULE 1155, 12-4-2009; RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : C84]

FACILITY PERMIT TO OPERATE TAMCO

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

D381.2 The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on a quarterly basis, at least, unless the equipment did not operate during the entire quarterly period. The routine quarterly inspection shall be conducted while the equipment is in operation and during daylight hours. If any visible emissions (not including condensed water vapor) are detected, the operator shall take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit.

The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

- 1). Stack or emission point identification;
- 2). Description of any corrective actions taken to abate visible emissions; and
- 3). Date and time visible emission was abated.

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

[Devices subject to this condition : C5]

E. Equipment Operation/Construction Requirements

E71.2 The operator shall not operate this equipment if the opacity of the exhaust gases from the baghouse is 3 percent or greater based on the arithmetic average of 24 consecutive 15-second opacity observations taken in accordance with USEPA Method 9.

[40CFR 60 Subpart AAa, 2-22-2005]

[Devices subject to this condition : C5]

E71.3 The operator shall not operate this equipment if the opacity of the gases from the screw conveyor is 10 percent or greater based on the arithmetic average of 24 consecutive 15-second opacity observations taken in accordance with USEPA Method 9.

FACILITY PERMIT TO OPERATE TAMCO

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

[40CFR 60 Subpart AAa, 2-22-2005]

[Devices subject to this condition : C5]

- E71.8 The operator shall not operate this equipment unless the emissions of toxic air contaminants (TACs) with a date of listing of September 10, 2010 or earlier in Rule 1401 does not exceed a cancer risk of 1 in a million or hazard index of 1 for acute or chronic TACs.

[RULE 1401, 9-10-2010]

[Devices subject to this condition : D80, D82]

- E193.1 The operator shall operate and maintain this equipment according to the following requirements:

FACILITY PERMIT TO OPERATE TAMCO

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

The baghouse pressure differential across the filter bags shall be maintained between 4" and 20" of water column whenever the equipment it serves is in operation.

The operator shall operate and maintain a pressure differential gauge to measure and indicate the pressure differential across the baghouse filter bags pursuant to the operation and maintenance requirements in 40 CFR Part 64.7. The pressure differential across the filters shall be recorded continuously.

For the purpose of this condition, a deviation shall be defined as when the pressure differential across the filters is less than 4" of water column or more than 20" of water column occurs during the normal operation of the equipment it serves.

Whenever a deviation occurs, the operator shall inspect this equipment to identify the cause of such a deviation, take immediate corrective action to maintain the pressure differential across the filters between 4" and 20" of water column, and keep records of the duration and cause (including unknown cause, if applicable) of the deviation and the corrective actions taken.

All deviations shall be reported to the AQMD on a semi-annual basis pursuant to the requirements specified in 40 CFR Part 64.9 and Condition Nos. 22 and 23 in Section K of this permit. The semi-annual monitoring report shall include the total operating time of this equipment and the total accumulated duration of all deviations for each semi-annual reporting period specified in Condition No. 23 in Section K of this permit.

The operator shall submit an application with an Quality Improvement Plan (QIP) in accordance with 40 CFR Part 64.8 to the AQMD if more than six deviations occur in any semi-annual reporting period specified in Condition No. 23 in Section K of this permit. The required QIP shall be submitted to the AQMD within 90 calendar days after the due date for the semi-annual monitoring report.

The operator shall inspect and maintain all components of this equipment on an annual basis in accordance with the manufacturer's specifications.

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

The operator shall keep adequate records in a format that is acceptable to the AQMD to demonstrate compliance with all applicable requirements specified in this condition and 40 CFR Part 64.9 for a minimum of five years.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997; 40CFR Part 64, 10-22-1997]

[Devices subject to this condition : C5]

E448.2 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(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition : C5, C84]

H. Applicable Rules

H23.3 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
PM	District Rule	1155

[RULE 1155, 12-4-2009]

[Devices subject to this condition : C5, C84]

K. Record Keeping/Reporting

K40.1 The operator shall provide to the District a source test report in accordance with the following specifications:

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SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

Source test results shall be submitted to the District no later than 60 days after the source test was conducted.

Emission data shall be expressed in terms of mass rate (lbs/hr). In addition, solid PM emissions, if required to be tested, shall also be reported in terms of grains per DSCF.

All exhaust flow rate shall be expressed in terms of dry standard cubic feet per minute (DSCFM) and dry actual cubic feet per minute (DACFM).

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

[Devices subject to this condition : C5]

K67.2 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 : C5, C84]

FACILITY PERMIT TO OPERATE TAMCO

SECTION I: PLANS AND SCHEDULES

This section lists all plans approved by AQMD for the purposes of meeting the requirements of applicable AQMD rules specified below. The operator shall comply with all conditions specified in the approval of these plans, with the following exceptions:

- a. The operator does not have to comply with NO_x or SO_x emission limits from rules identified in Table 1 or Table 2 of Rule 2001(j) which become effective after December 31, 1993.
- b. The operator does not have to comply with NO_x or SO_x emission limits from rules identified in Table 1 or Table 2 of Rule 2001(j) after the facility has received final certification of all monitoring and reporting requirements specified in Section F and Section G.

Documents pertaining to the plan applications listed below are available for public review at AQMD Headquarters. Any changes to plan applications will require permit modification in accordance with Title V permit revision procedures.

List of approved plans:

Application	Rule
305010	1420
489916	461

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
TAMCO**

SECTION J: AIR TOXICS

NOT APPLICABLE

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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)]

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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)]

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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)]

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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)]

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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.

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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.

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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)]

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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 1110.2	2-1-2008	Federally enforceable
RULE 1110.2	9-7-2012	Non federally enforceable
RULE 1113	6-3-2011	Non federally enforceable
RULE 1113	7-13-2007	Federally enforceable
RULE 1155	12-4-2009	Non federally enforceable
RULE 1171	2-1-2008	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 1304(a)-Modeling and Offset Exemption	6-14-1996	Federally enforceable
RULE 1304(c)-Offset Exemption	6-14-1996	Federally enforceable
RULE 1401	9-10-2010	Non federally enforceable
RULE 1404	4-6-1990	Non federally enforceable
RULE 1411	3-1-1991	Non federally enforceable
RULE 1415	12-3-2010	Non federally enforceable
RULE 1420	9-11-1992	Non federally enforceable
RULE 1470	5-4-2012	Non federally enforceable

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SECTION K: TITLE V Administration

RULE SOURCE	Adopted/Amended Date	FEDERAL Enforceability
RULE 2005	6-3-2011	Federally enforceable
RULE 2011	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
RULE 3003	3-16-2001	Non federally enforceable
RULE 3004	12-12-1997	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	6-9-2006	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 431.2	5-4-1990	Federally enforceable
RULE 431.2	9-15-2000	Non federally enforceable
RULE 461	3-7-2008	Non federally enforceable
RULE 461	6-3-2005	Federally enforceable
RULE 461, Bellowsless Conditions	3-7-2008	Non federally enforceable

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RULE SOURCE	Adopted/Amended Date	FEDERAL Enforceability
RULE 461, Healy, Phase I and II EVR Conditions	3-7-2008	Non federally enforceable
RULE 461, Universal Conditions	3-7-2008	Non federally enforceable
RULE 701	6-13-1997	Federally enforceable
40CFR 60 Subpart AAa	2-22-2005	Federally enforceable
40CFR 63 Subpart YYYYY	12-28-2007	Federally enforceable
40CFR 63SubpartZZZZ	3-9-2011	Federally enforceable
40CFR 63SubpartZZZZ_01	3-9-2011	Federally enforceable
40CFR 82 Subpart B	7-14-1992	Federally enforceable
40CFR 82 Subpart F	5-14-1993	Federally enforceable
40CFR Part 64	10-22-1997	Federally enforceable

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

1. WELDING EQUIPMENT
2. SPACE HEATERS, \leq 2-MMBTU/HR
3. I.C. ENGINES, \leq 50-HP

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APPENDIX B: RULE EMISSION LIMITS [RULE 1113 06-03-2011]

- (1) Except as provided in paragraphs (c)(3), (c)(4), and designated coatings averaged under (c)(6) of Rule 1113, no person shall supply, sell, offer for sale, market, manufacture, blend, repackage, apply, store at a worksite, or solicit the application of any architectural coating within the District:
 - (A) That is listed in the Table of Standards 1 and 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; or
 - (B) That is not listed in the Table of Standards 1, and contains VOC (excluding any colorant added to tint bases) in excess of 250 grams of VOC per liter of coating (2.08 pounds per gallon), less water, less exempt compounds, until January 1, 2014, at which time the limit drops to 50 grams of VOC per liter of coating, less water, less exempt compounds (0.42 pounds per gallon).
- (2) No person within the District shall add colorant at the point of sale that is listed in the Table of Standards 2 and contains VOC in excess of the corresponding VOC limit specified in the Table of Standards 2, after the effective date specified.

FACILITY PERMIT TO OPERATE TAMCO

APPENDIX B: RULE EMISSION LIMITS [RULE 1113 06-03-2011]

TABLE OF STANDARDS 1 VOC LIMITS

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

COATING CATEGORY	Ceiling Limit ¹	Current Limit ²	Effective Date		
			7/1/08	1/1/12	1/1/14
Bond Breakers		350			
Clear Wood Finishes		275			
Varnish	350	275			
Sanding Sealers	350	275			
Lacquer		275			
Concrete-Curing Compounds		100			
Concrete-Curing Compounds For Roadways and Bridges ³		350			
Concrete Surface Retarder		250			50
Driveway Sealer		100		50	
Dry-Fog Coatings		150			50
Faux Finishing Coatings					
Clear Topcoat		350		200	
Decorative Coatings		350			100
Glazes		350			
Japan		350			
Trowel Applied Coatings		350		150	50
Fire-Proofing Coatings		350			150
Flats	250	50	50		
Floor Coatings	100	50			
Form Release Compound		250			100
Graphic Arts (Sign) Coatings		500			150
Industrial Maintenance (IM) Coatings	420	100			
High Temperature IM Coatings		420			
Non-Sacrificial Anti-Graffiti Coatings		100			
Zinc-Rich IM Primers	340	100			
Magnesite Cement Coatings		450			
Mastic Coatings		300			100
Metallic Pigmented Coatings	500	500			150
Multi-Color Coatings		250			
Nonflat Coatings	150	50			
Pre-Treatment Wash Primers		420			
Primers, Sealers, and Undercoaters	200	100			
Reactive Penetrating Sealers		350			
Recycled Coatings		250			
Roof Coatings	250	50			
Roof Coatings, Aluminum		100			

FACILITY PERMIT TO OPERATE TAMCO

APPENDIX B: RULE EMISSION LIMITS [RULE 1113 06-03-2011]

Roof Primers, Bituminous	350	350			
Rust Preventative Coatings	400	100			
Stone Consolidant		450			
Sacrificial Anti-Graffiti Coatings		100		50	
Shellac					
Clear		730			
Pigmented		550			
Specialty Primers	350	100			
Stains		100			

FACILITY PERMIT TO OPERATE TAMCO

APPENDIX B: RULE EMISSION LIMITS [RULE 1113 06-03-2011]

COATING CATEGORY	Ceiling Limit ¹	Current Limit ²	Effective Date		
			7/1/08	1/1/12	1/1/14
Stains, Interior	250	250			
Swimming Pool Coatings					
Repair		340			
Other		340			
Traffic Coatings		100			
Waterproofing Sealers	250	100			
Waterproofing Concrete/Masonry Sealers	400	100			
Wood Preservatives		350			

1. The specified ceiling limits are applicable to products sold under the Averaging Compliance Option.
2. The specified limits remain in effect unless revised limits are listed in subsequent columns in the Table of Standards.
3. Does not include compounds used for curbs and gutters, sidewalks, islands, driveways and other miscellaneous concrete areas.

TABLE OF STANDARDS 1 (cont.) VOC LIMITS

Grams of VOC Per Liter of Material

COATING	Limit
Low-Solids Coating	120

TABLE OF STANDARDS 2 VOC LIMITS FOR COLORANTS

Grams of VOC Per Liter of Colorant Less Water and Less Exempt Compounds

COLORANT	Limit ⁴
Architectural Coatings, excluding IM Coatings	50
Solvent-Based IM	600
Waterborne IM	50

4. Effective January 1, 2014.

FACILITY PERMIT TO OPERATE TAMCO

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 TAMCO

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 TAMCO

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 TAMCO

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 TAMCO

APPENDIX B: RULE EMISSION LIMITS [RULE 1171 02-01-2008]

(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 1/1/2008*	EFFECTIVE 1/1/2009
SOLVENT CLEANING ACTIVITY	VOC g/l (lb/gal)	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 TAMCO

APPENDIX B: RULE EMISSION LIMITS [RULE 1171 02-01-2008]

SOLVENT CLEANING ACTIVITY (cont.)	CURRENT LIMITS*	EFFECTIVE 1/1/2008*	EFFECTIVE 1/1/2009
	VOC g/l (lb/gal)	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			
(I) Newsprint	100 (0.83)		

FACILITY PERMIT TO OPERATE TAMCO

APPENDIX B: RULE EMISSION LIMITS [RULE 1171 02-01-2008]

	CURRENT LIMITS*	EFFECTIVE 1/1/2008*	EFFECTIVE 1/1/2009
SOLVENT CLEANING ACTIVITY (cont.)	VOC g/l (lb/gal)	VOC g/l (lb/gal)	VOC g/l (lb/gal)
(II) Other Substrates	500 (4.2)	100 (0.83)	
(B) Removable Press Components	25 (0.21)		
(v) Screen Printing	500 (4.2)	100 (0.83)	
(vi) Ultraviolet Ink/ Electron Beam Ink Application Equipment (except screen printing)	650 (5.4)	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 TAMCO

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 TAMCO

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 TAMCO

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 TAMCO

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 ² 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 TAMCO

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 TAMCO

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		
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 TAMCO

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	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 TAMCO

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	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

FACILITY PERMIT TO OPERATE TAMCO

APPENDIX B: RULE EMISSION LIMITS [RULE 461, Bellowsless Conditions 03-07-2008]

GASOLINE TRANSFER AND DISPENSING, BELLOWS-LESS CONDITIONS

Condition number 1 shall not apply to Healy G-70-186 and G-70-187, Hasstech G-70-164 and G-70-175, and Hirt G-70-177 and G-70-181.

1. The Phase II vapor recovery system shall be installed, operated, and maintained such that the maximum allowable pressure through the riser, and underground piping does not exceed the dynamic back pressure described by the California Air Resources Board Executive Order by which the system was certified:

Nitrogen Flowrates (CFH)	Dynamic Back Pressure (Inches of Water)
60	0.50

Dynamic back pressure tests shall be conducted as a performance test to determine the Phase II system vapor recovery back pressures. The tests shall be conducted in accordance with CARB Test Procedure TP-201.4, Methodology 4 (July 3, 2002); as a performance test. This test shall be a one-time test and the results kept permanently on site. Results shall be submitted to the AQMD, office of engineering and compliance, within seventy-two (72) hours of tests.

2. The AQMD shall be notified by e-mail at r461testing@AQMD.gov or by facsimile at telephone number (909) 396-3606 at least seventy-two (72) hours prior to any of the above mentioned testing requirements. Such notification shall include the name of the owner or operator; the name of the contractor; the location of the facility; and the scheduled start and completion dates of the tests to be performed.
3. The testing for the above mentioned tests shall be conducted in accordance with the most recent Rule 461 amendment or CARB Executive Order requirements, whichever is more stringent.
4. All records and test results that are required to be maintained by Rule 461 shall be kept on site for four years and made available to District representatives upon request.

FACILITY PERMIT TO OPERATE TAMCO

APPENDIX B: RULE EMISSION LIMITS [RULE 461, Healy, Phase I and II EVR Conditions 03-07-2008]

GASOLINE TRANSFER AND DISPENSING, HEALY PHASE I AND PHASE II EVR CONDITIONS

1. The District at its discretion may wish to witness the installation and/or performance testing of the Healy Phase II EVR system not including ISD. At least seventy-two (72) hours prior to the installation and performance testing of the Healy Phase II EVR system not including ISD, the applicant shall notify the AQMD at telephone number (866) 770-9140.
2. At least seventy-two (72) hours prior to back-filling any underground storage tank or piping, the AQMD shall be notified by e-mail at r461backfill@aqmd.gov or by facsimile at telephone number (909) 396-3606. Such notification shall include the name of the owner or operator; the name of the contractors; the location of the facility; and the scheduled start and completion dates of the back-filling procedure. The back-filling procedure shall not commence until inspected by a District representative.
3. Depending on the system configuration, a leak rate test of drop tube/drain valve assembly shall be conducted to quantify the pressure integrity of both the drop tube and drain valve seal or a leak rate test of drop tube overflow prevention device and drain valve shall be conducted to quantify the pressure integrity of the drop tube overflow prevention device and the pressure integrity of the spill container drain valve. Either test shall be conducted as a performance test and as a reverification test. The test shall be conducted in accordance with Test Procedure Method TP-201.1C (October 8, 2003) or TP-201.1D (October 8, 2003), respectively. Results shall be submitted to the AQMD, Office of Engineering and Compliance, within seventy-two (72) hours of test.
4. A leak rate and cracking pressure test of pressure/vacuum relief vent valves shall be conducted within thirty days (30) after the start of operation of the Healy Phase I EVR equipment and at least once every three (3) years thereafter to determine the pressure and vacuum at which the pressure/vacuum vent valve actuates, and to determine the volumetric leak rate at a given pressure. The test shall be conducted in accordance with the Test Procedure Method TP-201.1E (October 8, 2003). Results shall be submitted to the AQMD, Office of Engineering and Compliance, within seventy-two (72) hours of test. This test result shall be kept on site for three (3) years and made available to District representatives upon request.
5. A static torque test of rotatable Phase I adaptors shall be conducted to quantify the amount of static torque required to start the rotation of the rotatable Phase I adaptors. The test shall be conducted in accordance with the Test Procedure Method outlined in TP-201.1B (October 8, 2003) as a performance test and as a reverification test. Results shall be submitted to the AQMD, Office of Engineering and Compliance, within seventy-two (72) hours of test.

FACILITY PERMIT TO OPERATE TAMCO

APPENDIX B: RULE EMISSION LIMITS

[RULE 461, Healy, Phase I and II EVR Conditions 03-07-2008]

6. A static pressure performance test for the Healy clean air separator using both the vacuum decay procedure and the positive pressure procedure shall be conducted to quantify the vapor tightness of the Healy clean air separator tank pressure management system. These tests shall be conducted in accordance with Exhibit 4 of CARB Executive Order VR-201-H, as a performance test and as a reverification test. Results shall be submitted to the AQMD, Office of Engineering and Compliance within seventy-two (72) hours of test.
7. A vapor to liquid volume ratio test shall be conducted to quantify the vapor to liquid (v/l) volumetric ratio of the Healy clean air separator system. The test shall be conducted in accordance with Exhibit 5 of CARB Executive Order VR-201-H, as a performance test and as a reverification test. Results shall be submitted to the AQMD, Office of Engineering and Compliance within seventy-two (72) hours of test.
8. A nozzle bag test shall be conducted on the Healy Phase II EVR nozzles to verify the integrity of the vapor valve. The test shall be conducted on any newly installed or replaced Healy Phase II EVR nozzles and in accordance with Exhibit 7 of CARB Executive Order VR-201-H. Results shall be submitted to the AQMD, Office of Engineering and Compliance within seventy-two (72) hours of test.
9. The static pressure leak decay test TP-201.3, shall be conducted in accordance with Exhibit 8 of CARB Executive Order VR-201-H. Verification of completing each step as outlined shall be documented by submitting a copy of Exhibit 8 to the AQMD, Office of Engineering and Compliance within seventy-two (72) hours of test.
10. Unless AQMD Rule 461 requires a more frequent testing or inspection schedule, the owner/operator shall be responsible to perform the scheduled weekly, quarterly, and annual inspections as outlined in the ARB approved installation, operation, and maintenance manual for the Healy Phase II EVR systems, as well as all the required vapor recovery system tests as per the current and appropriate ARB Executive Order.
11. A CARB certified Phase II enhanced vapor recovery system shall be fully permitted, installed, and tested by October 1, 2008. Failure to achieve this condition by October 1, 2008, shall result in the owner/operator to file a District approved compliance plan outlining the increments of progress towards completing the installation of a CARB certified Phase II enhanced vapor recovery system by April 1, 2009.
12. If the owner/operator plans to permanently cease all gasoline dispensing operations before April 1, 2009, a compliance plan shall be filed declaring to irrevocably surrender their Permit to Operate.

FACILITY PERMIT TO OPERATE TAMCO

APPENDIX B: RULE EMISSION LIMITS

[RULE 461, Healy, Phase I and II EVR Conditions 03-07-2008]

13. The AQMD shall be notified by e-mail at r461testing@aqmd.gov or by facsimile at telephone number (909) 396-3606 at least seventy-two (72) hours prior to any of the above mentioned testing requirements. Such notification shall include the name of the owner or operator; the name of the contractor; the location of the facility; and the scheduled start and completion dates of the tests to be performed.
14. The testing for the above mentioned tests shall be conducted in accordance with the most recent Rule 461 amendment or CARB Executive Order requirements, whichever is more stringent.
15. All records and test results that are required to be maintained by Rule 461 shall be kept on site for four years and made available to District representatives upon request.
16. Should the facility dispense more than 600,000 gallons of gasoline per calendar year and if the facility undergoes a major modification as defined by CARB's advisory letter number 336, "enhanced vapor recovery implementation update" dated April 15, 2005; the operator shall immediately cease all gasoline dispensing operations and file an application for a new permit to construct/operate to install a CARB certified ISD system. Gasoline dispensing operations shall not resume until the ISD system has been granted a permit to construct/operate and has been fully installed, tested, and operative.
17. Should the facility dispense more than 600,000 gallons of gasoline in any calendar year and if the facility does not undergo a major modification as defined by CARB's advisory letter number 336, "enhanced vapor recovery implementation update" dated April 15, 2005; the operator shall file an application for a new permit to construct/operate to install a CARB certified ISD system. The ISD system shall be fully installed, tested, and operative based on the following table:

<u>Gasoline Throughput Per Calendar Year</u>	<u>Date</u>
Greater than 1.8 million gallons	September 1, 2009
Between 600,000 and 1.8 million gallons	September 1, 2010

FACILITY PERMIT TO OPERATE TAMCO

APPENDIX B: RULE EMISSION LIMITS [RULE 461, Universal Conditions 03-07-2008] GASOLINE TRANSFER AND DISPENSING, UNIVERSAL CONDITIONS

1. Operation of this equipment shall be in compliance with all data and specifications submitted with the application under which this permit was issued, unless otherwise noted below.
2. This equipment shall be properly maintained and kept in good operating condition at all times.
3. All permit conditions applicable to the equipment described in the previous Permit to Operate shall remain in effect until the new or modified equipment is constructed and operated as described in this new permit. This Permit to Construct/Operate shall become invalid if the modification as described in the equipment description has not been completed within one year from the issue date. If the modification has not been completed within one year from the issue date of the permit, a written request shall be submitted to the AQMD (Attention: Randy Matsuyama) to reinstate the previously inactivated permit to operate. A new application shall be filed if there are plans to continue with the modification. Furthermore, this condition does not allow any time extensions to any modifications required by the California Air Resources Board or AQMD.
4. Except for diesel transfers, Phase I vapor recovery systems shall be in full operation whenever fuel is being transferred into storage tanks.
5. Except for diesel transfers, Phase II vapor recovery systems shall be in full operation whenever fuel is being transferred into motor vehicles, as defined in Rule 461.
6. All Phase I and Phase II vapor recovery equipment at this facility shall be installed, operated and maintained to meet all California Air Resources Board certification requirements.

FACILITY PERMIT TO OPERATE TAMCO

APPENDIX B: RULE EMISSION LIMITS [RULE 461, Universal Conditions 03-07-2008]

7. New equipment installations and subsequent service and repairs for any certified component for which this permit was issued, shall only be performed by a current and certified person who has successfully completed the manufacturer's training course and appropriate International Code Council (ICC) certification or CARB equivalent training. Completion of any AQMD training course does not constitute as a substitute for this requirement. Proof of successful completion of any manufacturer training course shall be with the manufacturer.
8. Except for HIRT VCS 400-7 equipment, a static pressure leak decay test shall be conducted to demonstrate that the storage tanks, the remote and/or nozzle vapor recovery check valves, associated vapor return piping and fittings are free from vapor leaks. The test shall be conducted in accordance with CARB Test Procedure Method TP-201.3 (March 17, 1999) as a performance test and as a reverification test. Results shall be submitted to the AQMD, Office of Engineering and Compliance, within seventy-two (72) hours of test.
9. The AQMD shall be notified by e-mail at r461testing@aqmd.gov or by facsimile at telephone number (909) 396-3606 at least seventy-two (72) hours prior to testing. Such notification shall include the name of the owner or operator; the name of the contractor; the location of the facility; and the scheduled start and completion dates of the static pressure leak decay test.
10. The testing for the above mentioned tests shall be conducted in accordance with the most recent Rule 461 amendment or CARB Executive Order requirements, whichever is more stringent.
11. All records and test results that are required to be maintained by Rule 461 shall be kept on site and made available to district representatives upon request.

**Toxic Air Contaminants Emissions (TAC)
Annual Reported Emissions for Reporting Period 2012**

Pollutant ID	Pollutant Description	Annual Emissions
106990	1,3-Butadiene	4.067
7664417	Ammonia	2197.406
7440382	Arsenic	2.409
71432	Benzene	11.139
7440439	Cadmium	88.302
18540299	Chromium (VI)	7.215
50000	Formaldehyde	30.539
7439921	Lead (inorganic)	1402.578
91203	Naphthalene	0.677
7440020	Nickel	85.813
1151	PAHs, total, with components not reported	0.476

South Coast Air Quality Management District

Statement of Basis

Proposed Title V Renewal Permit

Facility Name: TAMCO
Facility ID: 18931
SIC Code: 3312
Equipment Location: 12459-B Arrow Route
Ranch Cucamonga, CA 91739

Application No.: 564002
Application Submittal Date: 12-21-12

SCAQMD Contact Person: Richard H. Hawrylew, Air Quality Engineer II
Phone Number: (909) 396-2657
E-Mail Address: rhawrylew@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 is a renewal to the existing Title V facility permit. 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 SCAQMD 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 SCAQMD 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 SCAQMD implements Title V through Regulation XXX – Title V Permits, adopted by the SCAQMD 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 TAMCO located at 12459-B Arrow Route, Ranch Cucamonga. This facility is subject to Title V requirements because it is a major source.

2. Facility Description

This is an existing facility that is in the business of recycling ferrous scrap metal into concrete reinforcing bars (rebar). This facility is operating an electric arc furnace (EAF), three ladle heaters, a billet heating furnace, a lime storage silo, a dolomite silo, two carbon silos, gasoline dispensing equipment, four engines driving emergency generators, and one baghouse to control PM emissions.

3. Construction and Permitting History

The facility has been in constant operation with a Title V permit at this location since 2003. Numerous permits to construct and permits to operate have been issued to the facility since January 2003. An initial Title V permit was issued to the facility on January 2, 2003, a Title V renewal was issued on June 3, 2008, and several permit revisions were subsequently issued to this facility.

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 subject to the NESHAP requirements of 40 CFR 63 Subpart YYYYYY - National Emission Standards for Hazardous Air Pollutants for Area Sources: Electric Arc Furnace Steelmaking Facilities, and 40 CFR 63 Subpart ZZZZ - National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. This facility is also subject to NSPS requirements of 40 CFR 60 Subpart AAa - Standards of Performance for Steel Plants: Electric Arc Furnaces and Argon-Oxygen Decarburization Vessels Constructed After August 17, 1983. The NESHAP and NSPS requirements are reflected in the Title V permit.

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).

Emissions from the electric arc furnace are vented to the baghouse to control particulate emissions. The uncontrolled PM10 emissions to the baghouse are greater than the major source threshold for PM10 of 70 tons per year. As a result, the baghouse is subject to the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64. Permit conditions have been added to satisfy the CAM requirements. Such permit conditions were developed using the design criteria and other pertinent requirements identified in 40 CFR 64 - Compliance Assurance Monitoring and Technical Guidance Document and in the August 1998 Revised Draft CAM.

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 2012

Pollutant ID	Pollutant Description	Annual Emissions
CO	Carbon Monoxide	69.801
NOX	Nitrogen Oxides	102.028
ROG	Reactive Organic Gases	12.542
SOX	Sulfur Oxides	31.939
TSP	Total Suspended Particulates	40.222

**Toxic Air Contaminants Emissions (TAC)
Annual Reported Emissions for Reporting Period 2012**

Pollutant ID	Pollutant Description	Annual Emissions
106990	1,3-Butadiene	4.067
7664417	Ammonia	2197.406
7440382	Arsenic	2.409
71432	Benzene	11.139
7440439	Cadmium	88.302
18540299	Chromium (VI)	7.215
50000	Formaldehyde	30.539
7439921	Lead (inorganic)	1402.578
91203	Naphthalene	0.677
7440020	Nickel	85.813
1151	PAHs, total, with components not reported	0.476

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 2001 with the following risk factors:

Cancer Risk	2.04 in one million
Acute Hazard Index	0.01
Chronic Hazard Index	0.24

Updated health risk assessment has been submitted and is presently under review.

8. Compliance History

As noted, the facility has been in constant operation with a Title V permit since 2003. The facility has been subject to both self-reporting requirements and SCAQMD inspections. The facility has had 2 citizen complaints, 8 Notices to Comply, and 2 Notices of Violation during the past 5 years. The facility has since corrected and/or is in the process of correcting the problems, and is currently operating in compliance with all applicable rules and regulations.

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 PERMIT RENEWAL

The South Coast Air Quality Management District (SCAQMD) is proposing to issue a Title V permit renewal to the following existing facility:

TAMCO

12459-B Arrow Route
Rancho Cucamonga, CA 91739
Facility ID# 018931

Contact Person:

Jeffrey Dambrun
Environmental Manager
12459-B Arrow Route
Rancho Cucamonga, CA 91739

This is an existing facility, applying for a Title V permit renewal, which is in the business of recycling ferrous scrap metal into steel reinforcing bars (rebars) for the construction industry. This facility operates an electric arc furnace (EAF), three ladle heaters, a billet re-heating furnace, a lime storage silo, a dolomite silo, two carbon storage silos, two cooling towers, four engines driving emergency generators, and one large baghouse to control PM emissions and a dustless load-out station to railcars.

Pursuant to Title V of the federal Clean Air Act and SCAQMD 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 permit renewal application and requested the SCAQMD to renew their Title V permit. The proposed permit incorporates the facility information provided in the facility's Title V permit renewal application and all rules and regulations that will be applicable to the facility. In addition, the proposed permit includes provisions to allow TAMCO to replace the exhaust stacks for the Billet Reheat Furnace with a new stack that combines the exhaust from the two previous stacks into a common main stack. The proposed

permit is available for public review at SCAQMD, 21865 Copley Drive, Diamond Bar, CA 91765, and at the Paul A. Biane Library, 12505 Cultural Center Drive, Rancho Cucamonga, CA 91739. Information regarding the facility owner's compliance history submitted to the SCAQMD pursuant to California Health & Safety Code Section 42336, or otherwise known to the SCAQMD based on credible information, is also available from the SCAQMD for public review. For more information or to review additional supporting documents, call the SCAQMD's Title V hotline at (909) 396-3013. Written comments should be submitted to:

South Coast Air Quality Management District
Chemical, Mechanical, and Ports Permitting Team
21865 Copley Drive
Diamond Bar, CA 91765
Attention: Richard H. Hawrylew

Comments must be received by November 18, 2013. The SCAQMD will consider all public comments and may revise the Title V permit in accordance with SCAQMD Rules and Regulations.

The public may request SCAQMD to conduct a public hearing on the proposed permit by submitting a Hearing Request Form (Form 500-G) to Richard H. Hawrylew at the above SCAQMD address. The SCAQMD 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 SCAQMD 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 October 29, 2013. A copy of the hearing request must also be sent by first class mail to the appropriate facility contact person listed above.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING & COMPLIANCE</i> APPLICATION PROCESSING AND CALCULATIONS	Page	1 of 9
	A/N	528834, 35 & 39
	Processed By	KH/DR
	Checked By	DR
	Date	3/6/12

Applicant's Name: TAMCO
Mailing Address: 12459-B Arrow Route
 Rancho Cucamonga, CA 91739
Equipment Location: Same

Equipment Description:

APPLICATION NO. 528834: Previous 274588 D3 Mod P/O
 ALTERATION TO LADLE HEATER PERMIT TO OPERATE D66192 (A/N 274588), DEVICE D3, BY:
 THE ADDITION OF:

- ONE NORTH AMERICAN MODEL 4575-12 HIRAM 16.4 MM BTU/HR BURNER
 AND THE REMOVAL OF:
- ONE 5 MM BTU/HR BURNER

APPLICATION NO. 528835: Previous 310965 D2 Mod P/O
 ALTERATION TO LADLE HEATER PERMIT TO OPERATE F3191 (A/N 310965), DEVICE D2, BY:
 THE ADDITION OF:

- ONE NORTH AMERICAN MODEL 4575-12 HIRAM 16.4 MM BTU/HR BURNER
 AND THE REMOVAL OF:
- ONE 5 MM BTU/HR BURNER

APPLICATION NO. 528839: Previous 310966 D1 Mod P/O
 ALTERATION TO LADLE HEATER PERMIT TO OPERATE F3193 (A/N 310966), DEVICE D1, BY:
 THE ADDITION OF:

- ONE NORTH AMERICAN MODEL 4575-10-B HIRAM 11.9 MM BTU/HR BURNER
 AND THE REMOVAL OF:
- ONE 5 MM BTU/HR BURNER

HISTORY:

Application(s) received on: 10/28/11
 Equipment installed: Yes
 Violations recorded: No Notice of Violation or Notice to Comply has been issued in the
 last two years.

The applications was filed to modify the equipment by replacing the existing burners with new, higher rating, and low NOx burners. The modification was done without the benefit of a Permit to Construct.

Based on our records, the three heaters were never subject to NSR before. Application 528839 is for modification of Device D1 with previous A/N 310966 that has a previous A/N 00446B. Application 528835 is for modification of Device D2 with previous A/N 310965 that has a A/N 00447B. Application 528834 is for modification of Device D3 with previous A/N 274588.

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PROCESS DESCRIPTION

The equipment is for ladle heating.
It is fueled with natural gas.

CALCULATIONS:

Because the three heaters were never subject to NSR before, two-year averaged emissions will be used for emissions prior to modification.

APPLICATION NO. 528834:

D3

Given:

Maximum Heat Input Rating, MM BTU/hr:	16.4 MM BTU/hr
Fuel:	Natural gas
Equipment Operating Load:	100%
Conversion Factors, ppm @ 3% O ₂ to lb/MM BTU	
NO _x	0.00121 [lb/MM BTU]/ppm
CO	0.00074 [lb/MM BTU]/ppm
Operating Schedule:	
hrs/day	24 hrs/day
days/wk	7 days/wk
weeks/yr	52 wks/yr
NO _x Concentration, ppm @ 3% O ₂ (dry)	60
CO Concentration, ppm @ 3% O ₂ (dry)	
Emission Factors, lb/MM BTU: (Default)	
ROG:	0.0067
SO _x :	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:

ROG:

lb/hr	0.0067 lb/MM BTU*16.4 MM BTU =	0.11 lb/hr
lb/day Max.	0.11 lb/hr*24 hrs/day =	2.62 lb/day Max.
lb/day, Avg	0.11 lb/hr*24 hrs/day*1.00 (Load factor) =	2.62 lb/day, Avg
lb/yr	2.62 lb/day*7 days/wk*52 wks/yr =	955.14 lb/yr

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NOx:

lb/MM BTU 0.00121 lb/MM BTU-ppm*60 ppm = 0.0728 lb/MM BTU
 lb/hr 0.0728 lb/MM BTU*16.4 MM BTU/hr = 1.19 lb/hr
 lb/day Max. 1.19 lb/hr*24 hrs/day = 28.67 lb/day Max.
 lb/day, Avg 1.19 lb/hr*24 hrs/day*1.00 (Load factor) = 28.67 lb/day, Avg
 lb/yr 28.67 lb/day*7 days/wk*52 wks/yr = 10,436.29 lb/yr

SOx:

lb/hr 0.0008 lb/MM BTU*16.4 MM BTU = 0.013 lb/hr
 lb/day Max. 0.013 lb/hr*24 hrs/day = 0.31 lb/day Max.
 lb/day, Avg 0.013 lb/hr*24 hrs/day*1.00 (Load factor) = 0.31 lb/day, Avg
 lb/yr 0.31 lb/day*7 days/wk*52 wks/yr = 113.25 lb/yr

CO:

lb/hr 0.0333 lb/MM BTU*16.4 MM BTU = 0.55 lb/hr
 lb/day Max. 0.55 lb/hr*24 hrs/day = 13.12 lb/day Max.
 lb/day, Avg 0.55 lb/hr*24 hrs/day*1.00 (Load factor) = 13.12 lb/day, Avg
 lb/yr 13.12 lb/day*7 days/wk*52 wks/yr = 4,775.68 lb/yr

PM/PM10

lb/hr 0.0071 lb/MM BTU*16.4 MM BTU = 0.12 lb/hr
 lb/day Max. 0.12 lb/hr*24 hrs/day = 2.81 lb/day Max.
 lb/day, Avg 0.12 lb/hr*24 hrs/day*1.00 (Load factor) = 2.81 lb/day, Avg
 lb/yr 2.81 lb/day*7 days/wk*52 wks/yr = 1023.36 lb/yr

AN 528834:

D3

	ROG	NOx	SOx	CO	PM/PM10
Factor (lb/MM BTU)	0.0067	0.0728	0.0008	0.0333	0.0071
lb/hr	0.11	1.19	0.013	0.55	0.12
lb/day					
Max.	2.62	28.67	0.31	13.12	2.81
Avg.	2.62	28.67	0.31	13.12	2.81
lb/yr	955.14	10,436.29	113.25	4,775.68	1,023.36

Emission increases, lb/day:

	ROG	NOx	SOx	CO	PM/PM10
A/N 528834	2.62	28.67	0.31	13.12	2.81
A/N 274588	0.42	3.93	0.04	2.12	0.45
Increases	2.20	24.74	0.27	11.00	2.36

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Emission increases, lb/hr (For modeling analysis)

	ROG	NOx	SOx	CO	PM/PM10
A/N 528834	0.11	1.19	0.01	0.55	0.12
A/N 274588	0.03	0.62	0.00	0.17	0.04
Increases	0.08	0.58	0.01	0.38	0.08

APPLICATION NO. 528835:

D2

Given:

Maximum Heat Input Rating, MM BTU/hr:

16.4 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

Operating Schedule:

hrs/day

24 hrs/day

days/wk

7 days/wk

weeks/yr

52 wks/yr

NOx Concentration, ppm @ 3% O₂ (dry)

60

CO Concentration, ppm @ 3% O₂ (dry)

Emission Factors, lb/MM BTU: (Default)

ROG:

0.0067

SOx :

0.0008

CO:

0.0333

PM:

0.0071

PM₁₀ in total PM:

100%

HHV of natural gas:

1,050 BTU/ft³

CO limit?

No

Computations:

ROG:

lb/hr

0.0067 lb/MM BTU* 16.4 MM BTU =

0.11 lb/hr

lb/day Max.

0.11 lb/hr*24 hrs/day =

2.62 lb/day Max.

lb/day, Avg

0.11 lb/hr*24 hrs/day*1.00 (Load factor) =

2.62 lb/day, Avg

lb/yr

2.62 lb/day*7 days/wk*52 wks/yr =

955.14 lb/yr

NOx:

lb/MM BTU

0.00121 lb/MM BTU-ppm*60 ppm =

0.0728 lb/MM BTU

lb/hr

0.0728 lb/MM BTU*16.4 MM BTU/hr =

1.19 lb/hr

lb/day Max.

1.19 lb/hr*24 hrs/day =

28.67 lb/day Max.

lb/day, Avg $1.19 \text{ lb/hr} * 24 \text{ hrs/day} * 1.00 \text{ (Load factor)} = 28.67 \text{ lb/day, Avg}$
 lb/yr $28.67 \text{ lb/day} * 7 \text{ days/wk} * 52 \text{ wks/yr} = 10436.29 \text{ lb/yr}$

SOx:

lb/hr $0.0008 \text{ lb/MM BTU} * 16.4 \text{ MM BTU} = 0.013 \text{ lb/hr}$
 lb/day Max. $0.013 \text{ lb/hr} * 24 \text{ hrs/day} = 0.31 \text{ lb/day Max.}$
 lb/day, Avg $0.013 \text{ lb/hr} * 24 \text{ hrs/day} * 1.00 \text{ (Load factor)} = 0.31 \text{ lb/day, Avg}$
 lb/yr $0.31 \text{ lb/day} * 7 \text{ days/wk} * 52 \text{ wks/yr} = 113.25 \text{ lb/yr}$

CO:

lb/hr $0.0333 \text{ lb/MM BTU} * 16.4 \text{ MM BTU} = 0.55 \text{ lb/hr}$
 lb/day Max. $0.55 \text{ lb/hr} * 24 \text{ hrs/day} = 13.12 \text{ lb/day Max.}$
 lb/day, Avg $0.55 \text{ lb/hr} * 24 \text{ hrs/day} * 1.00 \text{ (Load factor)} = 13.12 \text{ lb/day, Avg}$
 lb/yr $13.12 \text{ lb/day} * 7 \text{ days/wk} * 52 \text{ wks/yr} = 4775.68 \text{ lb/yr}$

PM/PM10

lb/hr $0.0071 \text{ lb/MM BTU} * 16.4 \text{ MM BTU} = 0.12 \text{ lb/hr}$
 lb/day Max. $0.12 \text{ lb/hr} * 24 \text{ hrs/day} = 2.81 \text{ lb/day Max.}$
 lb/day, Avg $0.12 \text{ lb/hr} * 24 \text{ hrs/day} * 1.00 \text{ (Load factor)} = 2.81 \text{ lb/day, Avg}$
 lb/yr $2.81 \text{ lb/day} * 7 \text{ days/wk} * 52 \text{ wks/yr} = 1023.36 \text{ lb/yr}$

AN 528835:

D2

	<i>ROG</i>	<i>NOx</i>	<i>SOx</i>	<i>CO</i>	<i>PM/PM10</i>
Factor (lb/MM BTU)	0.0067	0.0728	0.0008	0.0333	0.0071
lb/hr	0.11	1.19	0.013	0.55	0.12
lb/day Max.	2.62	28.67	0.31	13.12	2.81
lb/day Avg.	2.62	28.67	0.31	13.12	2.81
lb/yr	955.14	10,436.29	113.25	4,775.68	1,023.36

Emission increases, lb/day:

	<i>ROG</i>	<i>NOx</i>	<i>SOx</i>	<i>CO</i>	<i>PM/PM10</i>
A/N 528835	2.62	28.67	0.31	13.12	2.81
A/N 310965	0.05	0.85	0.004	0.23	0.05
Increases	2.58	27.82	0.31	12.89	2.76

Emission increases, lb/hr (For modeling analysis)

	<i>ROG</i>	<i>NOx</i>	<i>SOx</i>	<i>CO</i>	<i>PM/PM10</i>
A/N 528835	0.11	1.19	0.01	0.55	0.12
A/N 310965	0.03	0.62	0.004	0.17	0.04
Increases	0.08	0.58	0.01	0.38	0.08

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APPLICATION NO. 528839: D1

Given:

Maximum Heat Input Rating, MM BTU/hr:

11.9 MM BTU/hr

Fuel:

Natural gas

Equipment Operating Load:

100%

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

NO_x

0.00121 [lb/MM BTU]/ppm

CO

0.00074 [lb/MM BTU]/ppm

Operating Schedule:

hrs/day

24 hrs/day

days/wk

7 days/wk

weeks/yr

52 wks/yr

NO_x Concentration, ppm @ 3% O₂ (dry)

60

CO Concentration, ppm @ 3% O₂ (dry)

Emission Factors, lb/MM BTU: (Default)

ROG:

0.0067

SO_x :

0.0008

CO:

0.0333

PM:

0.0071

PM₁₀ in total PM:

100%

HHV of natural gas:

1,050 BTU/ft³

CO limit?

No

Computations:

ROG:

lb/hr

$$0.0067 \text{ lb/MM BTU} * 11.9 \text{ MM BTU} =$$

0.08 lb/hr

lb/day Max.

$$0.08 \text{ lb/hr} * 24 \text{ hrs/day} =$$

1.90 lb/day Max.

lb/day, Avg

$$0.08 \text{ lb/hr} * 24 \text{ hrs/day} * 1.00 \text{ (Load factor)} =$$

1.90 lb/day, Avg

lb/yr

$$1.90 \text{ lb/day} * 7 \text{ days/wk} * 52 \text{ wks/yr} =$$

693.06 lb/yr

NO_x:

lb/MM BTU

$$0.00121 \text{ lb/MM BTU-ppm} * 60 \text{ ppm} =$$

0.0728 lb/MM BTU

lb/hr

$$0.0728 \text{ lb/MM BTU} * 11.9 \text{ MM BTU/hr} =$$

0.87 lb/hr

lb/day Max.

$$0.87 \text{ lb/hr} * 24 \text{ hrs/day} =$$

20.80 lb/day Max.

lb/day, Avg

$$0.87 \text{ lb/hr} * 24 \text{ hrs/day} * 1.00 \text{ (Load factor)} =$$

20.80 lb/day, Avg

lb/yr

$$20.80 \text{ lb/day} * 7 \text{ days/wk} * 52 \text{ wks/yr} =$$

7572.67 lb/yr

SO_x:

lb/hr

$$0.0008 \text{ lb/MM BTU} * 11.9 \text{ MM BTU} =$$

0.009 lb/hr

lb/day Max.

$$0.009 \text{ lb/hr} * 24 \text{ hrs/day} =$$

0.23 lb/day Max.

lb/day, Avg

$$0.009 \text{ lb/hr} * 24 \text{ hrs/day} * 1.00 \text{ (Load factor)} =$$

0.23 lb/day, Avg

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lb/yr $0.23 \text{ lb/day} * 7 \text{ days/wk} * 52 \text{ wks/yr} = 82.18 \text{ lb/yr}$

CO:

lb/hr $0.0333 \text{ lb/MM BTU} * 11.9 \text{ MM BTU} = 0.40 \text{ lb/hr}$
 lb/day Max. $0.40 \text{ lb/hr} * 24 \text{ hrs/day} = 9.52 \text{ lb/day Max.}$
 lb/day, Avg $0.40 \text{ lb/hr} * 24 \text{ hrs/day} * 1.00 \text{ (Load factor)} = 9.52 \text{ lb/day, Avg}$
 lb/yr $9.52 \text{ lb/day} * 7 \text{ days/wk} * 52 \text{ wks/yr} = 3465.28 \text{ lb/yr}$

PM/PM10

lb/hr $0.0071 \text{ lb/MM BTU} * 11.9 \text{ MM BTU} = 0.09 \text{ lb/hr}$
 lb/day Max. $0.09 \text{ lb/hr} * 24 \text{ hrs/day} = 2.04 \text{ lb/day Max.}$
 lb/day, Avg $0.09 \text{ lb/hr} * 24 \text{ hrs/day} * 1.00 \text{ (Load factor)} = 2.04 \text{ lb/day, Avg}$
 lb/yr $2.04 \text{ lb/day} * 7 \text{ days/wk} * 52 \text{ wks/yr} = 742.56 \text{ lb/yr}$

A/N 528839:

D1

	ROG	NOx	SOx	CO	PM/PM10
Factor (lb/MM BTU)	0.0067	0.0728	0.0008	0.0333	0.0071
lb/hr	0.08	0.87	0.009	0.40	0.09
lb/day Max.	1.90	20.80	0.23	9.52	2.04
lb/day Avg.	1.90	20.80	0.23	9.52	2.04
lb/yr	693.06	7,572.67	82.18	3,465.28	742.56

Emission increases, lb/day:

	ROG	NOx	SOx	CO	PM/PM10
A/N 528839	1.90	20.80	0.23	9.52	2.04
A/N 310966	0.16	3.00	0.01	0.81	0.17
Increases	1.74	17.81	0.21	8.71	1.87

Emission increases, lb/hr (For modeling analysis)

	ROG	NOx	SOx	CO	PM/PM10
A/N 528839	0.08	0.87	0.01	0.40	0.09
A/N 310966	0.03	0.62	0.004	0.17	0.04
Increases	0.05	0.25	0.01	0.23	0.05

Emission Increases, lb/day

	ROG	NOx	SOx	CO	PM10
A/N 528834	2.20	24.74	0.27	11.00	2.36
A/N 528835	2.58	27.82	0.31	12.89	2.76
A/N 528839	1.74	17.81	0.21	8.71	1.87
Total	6.52	70.37	0.79	32.61	6.99

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Project ERC requirements
See attachment

RTCs Requirements:

A/Ns	NOx, lbs
528834	10,436
528835	10,436
528839	7,573
Total	28,445

RULES EVALUATION

Rule 212:

(c) (1): Emissions near a school

The equipment is not located within 1,000 feet from the outer boundary of a school. (The nearest school is 7,392 feet from the facility). This is not a project requiring notification under this paragraph.

(c) (2): On-site emission increases exceeding the daily maximums

Source is defined in RXIII as a permit unit or device. Each ladle heater has emissions increases less than the threshold. This is not a project requiring notification under this paragraph.

(c) (3): Emissions of toxic air contaminants

Risk is less than one in one million. This is not a project requiring notification under this paragraph.

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.

Rule 1147:

Because the equipment is located at a NOx RECLAIM facility, it is exempted per Rule 1147 (g) (1) (B).

Rule 1401:

MICR is less than 1 in a million and HI is less than 1. Complies.

Rule 1703 - PSD Analysis:

This is an existing CO major facility. The modification, however, does not cause a significant emission increase of CO. Therefore, except for BACT, all other provisions of the rule are not applicable. Natural gas is considered BACT for the heaters.

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New Source Review

BACT:

Currently, there is no listed BACT for ladle heaters. Even though the equipment is exempt from Rule 1147, the rule limit, 60 ppm NOx @ 3% O₂ (operating temperature > 1,200 F) could be used as BACT.

	ppm @ 3% O ₂		Compliance
	Limit	Expected	
NOx	60	60	Yes

RTCs:

NOx RTCs requirements:			28,445 lb/yr
	From	To	
Facility NOx RTC Holding	7/1/11	6/30/12	147,455 lbs
	7/1/12	6/30/13	147,455 lbs

The facility holds enough NOx RTCs for the operation of the equipment modification.

Modeling:

The emission increase is less than the amount in Table A-1 of Rule 2005. No further analysis is required. Complies.

Offsets:

Facility PTE is over the offset threshold for ROG and PM10. Offsets are required. ~~See attachment~~

Title V

Nox starting allocation + non tradable = 128,250 #

Nox increase is below this level, thus a de minimus significant project

Non RECLAIM pollutants are below the de minimus significant threshold

45 day EPA notice is required

RECOMMENDATIONS

Hold pending ROG & PM10 ERCs.

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TAMCO, ID 18931

EQUIPMENT DESCRIPTION

APPLICATION NO. 528831
TITLE V/RECLAIM FACILITY MODIFICATION

APPLICATION NO. 528834
MODIFICATION OF LADLE HEATER D3 BY REPLACING THE 5 MMBTU/HR BURNER WITH A 16.4 MMBTU/HR BURNER

APPLICATION NO. 528835
MODIFICATION OF LADLE HEATER D2 BY REPLACING THE 5 MMBTU/HR BURNER WITH A 16.4 MMBTU/HR BURNER

APPLICATION NO. 528839
MODIFICATION OF LADLE HEATER D1 BY REPLACING THE 5 MMBTU/HR BURNER WITH A 11.9 MMBTU/HR BURNER

BACKGROUND

A/Ns 528834, 528835, 528839 for three ladle heater alterations along with A/N 528831 for the Title V Reclaim modification were received on 10/28/11. The alteration included installation of 16.4 mmBtu/hr natural gas fired burners by replacing previously permitted 5 mmBtu/hr natural gas fired burners. This was done without first obtaining Permit to Construct.

EPA review for the ladle heaters, silo/lime hopper and carbon storage were submitted to EPA for 45-day review on 4/11/12. In that submittal to EPA, the three ladle heaters were evaluated based upon the maximum potential to emit operating at maximum rated capacity and operating 24 hr/day, 7 days/week. This operating scenario required emission offsets of 8 lbs/day of VOC and 9 lbs/day of PM10; these offset requirements were made known to the facility on 4/11/12. EPA review ended on 7/10/12, but permits were not issued at that time as the emission offsets had not been provided.

In a letter dated and received on 2/14/13, the facility requests to limit the use of natural gas on the three ladle heaters to a combined 18 mmcf/month, so as to reduce the amount of emission offsets required to 4 lbs/day of VOC and 5 lbs/day of PM10; these offsets have been acquired by the facility. Because this is a change to the evaluation that was submitted to EPA on 4/11/12, the three ladle heater applications will be re-evaluated for under this engineering evaluation dated 2/14/13 and are presented in the following pages.

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A new draft permit will be submitted to EPA for a 45 day review that will include the new lower emissions potential from limiting a combined fuel through put to 18 mmcf/month of natural gas for the three ladle heaters.

EMISSION ESTIMATE

Fuel usage under the monthly fuel usage “bubble” is assumed to be proportionate to the rating for data entry purposes. See attached calculation sheets

RULE COMPLIANCE

No change to maximum hourly or daily potential to emit. Only the 30 day average, used for determining offsets, is affected. Please see previous evaluation dated 3/6/12 for other rule determinations (attached).

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Re-evaluation of New Source Review - Emissions Offsets

	ROG #/day	NOx	SOx	CO	PM/PM10
D1 30 day average	1.12	12.27	0.1	5.59	1.2
D1 pre-mod, 2 year average	-0.16	-3	-0.01	-0.81	-0.17
D1 increase	0.96	9.27	0.09	4.78	1.03
Offsets (X 1.2)	1.15(1)				1.2(1)
D2 30 day average	1.54	16.91	0.13	7.7	1.65
D2 pre-mod, 2 year average	-0.05	-0.85	-0.004	-0.23	-0.05
D2 increase	1.49	16.06	0.126	7.47	1.6
Offsets (X 1.2)	1.8 (2)				1.9 (2)
D3 30 day average	1.54	16.91	0.13	7.7	1.65
D3 pre-mod, 2 year average	-0.42	-3.93	-0.04	-2.12	-0.45
D3 increase	1.12	12.98	0.09	5.58	1.2
Offsets (X 1.2)	1.3 (1)				1.44 (1)
Silo/Lime hopper increase					0.31
Offsets (X 1.2)					0.07 (0)
Carbon storage increase					0.02
Offsets (X 1.2)					0.024 (0)
Increase for "project"	3.57	38.31	0.31	17.83	4.16
Project Offsets (X 1.2)	4.28 (4)				4.99 (5)

Due to rounding, the project requires one more pound of PM10 than if each permit were considered individually. Additional pound of PM10 required for the project was used on the silo/lime hopper.

RECOMMENDATION

Issue permits to operate with limits on the monthly gas usage.

EMISSIONS FOR FIRING ON NATURAL GAS
(OVENS, FURNACES, HEATERS, ETC.)

Emission factors are from form B-1
Except NOx which is calculated from the ppm of NOx

Maximum Burner Rating in BTU/hr =	44,840,000	BTU/hr	<i>D1, D2, D3 combined</i>
Max conditioned fuel usage =	18,000,000	CF/mo	
Previously conditioned fuel usage =		CF/mo	
Average Operating Schedule =		24 hr/day	
Maximum Operating Schedule =		24 hr/day	
Expected emission of NOx=		60 ppm	
Average Loading=	100.0%		
Maximum Loading =	100.0%		
Maximum operating days per month =		30 days	

AVERAGE EMISSIONS

RHC	=	0.2989	lb/hr	7.1744	lb/day
NOx	=	3.2554	lb/hr	78.1292	lb/day
SO2	=	0.0256	lb/hr	0.6149	lb/day
CO	=	1.4947	lb/hr	35.8720	lb/day
PART	=	0.3203	lb/hr	7.6869	lb/day

MAXIMUM EMISSIONS

RHC	=	0.2989	lb/hr	7.1744	lb/day
NOx	=	3.2554	lb/hr	78.1292	lb/day
SO2	=	0.0256	lb/hr	0.6149	lb/day
CO	=	1.4947	lb/hr	35.8720	lb/day
PART	=	0.3203	lb/hr	7.6869	lb/day

Thirty day average emissions

RHC	=	4.20	lb/dy	1512	lb/yr
NOx	=	46.08	lb/dy	16589	lb/yr
SO2	=	0.36	lb/dy	130	lb/yr
CO	=	21.00	lb/dy	7560	lb/yr
PART	=	4.50	lb/dy	1620	lb/yr

Monthly Emissions

RHC	=	126.00	lb/mo
NOx	=	1382.40	lb/mo
SO2	=	10.80	lb/mo
CO	=	630.00	lb/mo
PART	=	135.00	lb/mo

**Emissions Prior to Modification
D1**

A/N 310966

Given:

Fuel: Natural gas

Operating Data/Factors:		Fuel Consumed	# days
		ft ³	
From	To		
Jan-98	Dec-98	9,246,830	303
Jan-99	Dec-99	5,220,450	335

Emission Factors, lb/MM ft³ (Default):

ROG:	7
NOx:	130
SOx :	0.60
CO:	35
PM:	7.50
PM ₁₀ in total PM:	100%
Natural gas HHV:	1,050 BTU/ft ³

Computations:

ROG, lb/day:

Jan-98	Dec-98	7 lb/MM cf*9,246,830 cf*10 ⁻⁶ MM cf/cf/303 days =	0.21 lb/day
Jan-99	Dec-99	7 lb/MM cf*5,220,450 cf*10 ⁻⁶ MM cf/cf/335 days =	0.11 lb/day
Average		(0.21+0.11) lb/day/2 =	0.16 lb/day

NOx:

Jan-98	Dec-98	130 lb/MM cf*9,246,830 cf*10 ⁻⁶ MM cf/cf/303 days =	3.97 lb/day
Jan-99	Dec-99	130 lb/MM cf*5,220,450 cf*10 ⁻⁶ MM cf/cf/335 days =	2.03 lb/day
Average		(3.97+2.03) lb/day/2 =	3.00 lb/day

SOx:

Jan-98	Dec-98	0.6 lb/MM cf*9,246,830 cf*10 ⁻⁶ MM cf/cf/303 days =	0.02 lb/day
Jan-99	Dec-99	0.6 lb/MM cf*5,220,450 cf*10 ⁻⁶ MM cf/cf/335 days =	0.01 lb/day
Average		(0.02+0.01) lb/day/2 =	0.01 lb/day

CO:

Jan-98	Dec-98	35 lb/MM cf*9,246,830 cf*10 ⁻⁶ MM cf/cf/303 days =	1.07 lb/day
Jan-99	Dec-99	35 lb/MM cf*5,220,450 cf*10 ⁻⁶ MM cf/cf/335 days =	0.55 lb/day
Average		(1.07+0.55) lb/day/2 =	0.81 lb/day

PM:

Jan-98	Dec-98	7.5 lb/MM cf*9,246,830 cf*10 ⁻⁶ MM cf/cf/303 days =	0.23 lb/day
Jan-99	Dec-99	7.5 lb/MM cf*5,220,450 cf*10 ⁻⁶ MM cf/cf/335 days =	0.12 lb/day
Average		(0.23+0.12) lb/day/2 =	0.17 lb/day

Summary:

D1				
lb/day				
ROG	NOx	SOx	CO	PM/PM10
0.16	3.00	0.01	0.81	0.17

**Emissions Prior to Modification
D2**

A/N 310965

Given:

Fuel:

Natural gas

Operating Data/Factors:		Fuel Consumed ft ³	# days
From	To		
Jan-98	Dec-98	2,108,710	325
Jan-99	Dec-99	2,016,540	305

Emission Factors, lb/MM ft³ (Default):

ROG:	7
NOx:	130
SOx :	0.60
CO:	35
PM:	7.50
PM ₁₀ in total PM:	100%
Natural gas HHV:	1,050 BTU/ft ³

Computations:

ROG, lb/day:

Jan-98	Dec-98	$7 \text{ lb/MM cf} \times 2,108,710 \text{ cf} \times 10^{-6} \text{ MM cf/cf} / 325 \text{ days} =$	0.05 lb/day
Jan-99	Dec-99	$7 \text{ lb/MM cf} \times 2,016,540 \text{ cf} \times 10^{-6} \text{ MM cf/cf} / 305 \text{ days} =$	0.05 lb/day
Average		$(0.05+0.05) \text{ lb/day} / 2 =$	0.05 lb/day

NOx:

Jan-98	Dec-98	$130 \text{ lb/MM cf} \times 2,108,710 \text{ cf} \times 10^{-6} \text{ MM cf/cf} / 325 \text{ days} =$	0.84 lb/day
Jan-99	Dec-99	$130 \text{ lb/MM cf} \times 2,016,540 \text{ cf} \times 10^{-6} \text{ MM cf/cf} / 305 \text{ days} =$	0.86 lb/day
Average		$(0.84+0.86) \text{ lb/day} / 2 =$	0.85 lb/day

SOx:

Jan-98	Dec-98	$0.6 \text{ lb/MM cf} \times 2,108,710 \text{ cf} \times 10^{-6} \text{ MM cf/cf} / 325 \text{ days} =$	0.00 lb/day
Jan-99	Dec-99	$0.6 \text{ lb/MM cf} \times 2,016,540 \text{ cf} \times 10^{-6} \text{ MM cf/cf} / 305 \text{ days} =$	0.00 lb/day
Average		$(0.00+0.00) \text{ lb/day} / 2 =$	0.00 lb/day

CO:

Jan-98	Dec-98	$35 \text{ lb/MM cf} \times 2,108,710 \text{ cf} \times 10^{-6} \text{ MM cf/cf} / 325 \text{ days} =$	0.23 lb/day
Jan-99	Dec-99	$35 \text{ lb/MM cf} \times 2,016,540 \text{ cf} \times 10^{-6} \text{ MM cf/cf} / 305 \text{ days} =$	0.23 lb/day
Average		$(0.23+0.23) \text{ lb/day} / 2 =$	0.23 lb/day

PM:

Jan-98	Dec-98	$7.5 \text{ lb/MM cf} \times 2,108,710 \text{ cf} \times 10^{-6} \text{ MM cf/cf} / 325 \text{ days} =$	0.05 lb/day
Jan-99	Dec-99	$7.5 \text{ lb/MM cf} \times 2,016,540 \text{ cf} \times 10^{-6} \text{ MM cf/cf} / 305 \text{ days} =$	0.05 lb/day
Average		$(0.05+0.05) \text{ lb/day} / 2 =$	0.05 lb/day

Summary:

D2

lb/day				
ROG	NOx	SOx	CO	PM/PM10
0.05	0.85	0.00	0.23	0.05

**Emissions Prior to Modification
D3**

A/N 274588

Given:

Fuel: Natural gas

Operating Data/Factors:		Fuel Consumed ft ³	# days
From	To		
Jan-98	Dec-98	24,824,700	308
Jan-99	Dec-99	11,958,900	297

Emission Factors, lb/MM ft³ (Default):

ROG:	(Default)	7
NOx:	(Facility permit)	65
SOx :	(Default)	0.60
CO:	(Default)	35
PM:	(Default)	7.50

PM₁₀ in total PM: 100%

Natural gas HHV: 1,050 BTU/ft³

Computations:

ROG, lb/day:

Jan-98	Dec-98	7 lb/MM cf*24,824,700 cf*10 ⁻⁶ MM cf/cf/308 days =	0.56 lb/day
Jan-99	Dec-99	7 lb/MM cf*11,958,900 cf*10 ⁻⁶ MM cf/cf/297 days =	0.28 lb/day
Average		(0.56+0.28) lb/day/2 =	0.42 lb/day

NOx:

Jan-98	Dec-98	65 lb/MM cf*24,824,700 cf*10 ⁻⁶ MM cf/cf/308 days =	5.24 lb/day
Jan-99	Dec-99	65 lb/MM cf*11,958,900 cf*10 ⁻⁶ MM cf/cf/297 days =	2.62 lb/day
Average		(5.24+2.62) lb/day/2 =	3.93 lb/day

SOx:

Jan-98	Dec-98	0.6 lb/MM cf*24,824,700 cf*10 ⁻⁶ MM cf/cf/308 days =	0.05 lb/day
Jan-99	Dec-99	0.6 lb/MM cf*11,958,900 cf*10 ⁻⁶ MM cf/cf/297 days =	0.02 lb/day
Average		(0.05+0.02) lb/day/2 =	0.04 lb/day

CO:

Jan-98	Dec-98	35 lb/MM cf*24,824,700 cf*10 ⁻⁶ MM cf/cf/308 days =	2.82 lb/day
Jan-99	Dec-99	35 lb/MM cf*11,958,900 cf*10 ⁻⁶ MM cf/cf/297 days =	1.41 lb/day
Average		(2.82+1.41) lb/day/2 =	2.12 lb/day

PM:

Jan-98	Dec-98	7.5 lb/MM cf*24,824,700 cf*10 ⁻⁶ MM cf/cf/308 days =	0.60 lb/day
Jan-99	Dec-99	7.5 lb/MM cf*11,958,900 cf*10 ⁻⁶ MM cf/cf/297 days =	0.30 lb/day
Average		(0.60+0.30) lb/day/2 =	0.45 lb/day

Summary:

D3				
lb/day				
ROG	NOx	SOx	CO	PM/PM10
0.42	3.93	0.04	2.12	0.45

Toxics

Furnace Rating: 16 MM BTU (worst case)
 Fuel HHV 1,050 BTU/ft³
 Fuel Consumption 15,619 ft³/hr
 Operating Schedule:
 hrs/day 24
 days/wk 7
 weeks/yr 50
 Equipment Operating Load: 100.0%

	Emissions				
	lb/MM ft ³	lb/hr	lb/day	lb/yr	
Acetaldehyde	0.0031	4.84E-05	0.00116	0.40672	A1
Acrolein	0.0027	4.22E-05	0.00101	0.35424	A3
Benzene	0.0058	9.06E-05	0.00217	0.76096	B1
Formaldehyde	0.0123	1.92E-04	0.00461	1.61376	F3
Naphthalene	0.0003	4.69E-06	0.00011	0.03936	P30
PAH'S	0.0001	1.56E-06	0.00004	0.01312	P9
Toluene	0.0265	4.14E-04	0.00993	3.47680	T3
Xylenes	0.0197	3.08E-04	0.00738	2.58464	X1

Note:

Toxic air contaminants are from Emission Factors for AB-2588

TIER 2 SCREENING RISK ASSESSMENT REPORT

A/N: 528834
 Fac: 18931

Application deemed complete date: 10/28/11

Data	
Factor	1.19
	0.92
	0.78

Factors tables

	For Chronic X/Q	
3		
6	For Acute X/Q	

Factors (ug/m3)/(tons/yr)

	X/Q	X/Qmax
al	0.42	25.4
ial	2.24	119.2

Exposure and Intake Factors

	AEmm	DBR	EVF
al	1	302	0.96
	1	149	0.38

RESULTS

CP (mg/(kg-day))⁻¹ * Q (ton/yr) * (X/Q) * AFann * MET * DBR * EVF * 1E-6 * MP

Compound	Residential	Commercial
Hyde	3.06E-10	3.19E-10
(including benzene from gasoline)	5.73E-09	5.97E-09
Hyde	2.55E-09	2.66E-09
Alene	3.56E-10	3.71E-10
c Aromatic Hydrocarbon (PAHs)	1.15E-07	5.87E-08
methyl benzene)		
isomers and mixtures)		
	1.24E-07	6.80E-08
	PASS	PASS

No Cancer Burden, MICR < 1.0E-6

5b. Cancer Burden	NO
X/Q for one-in-a-million:	
Distance (meter)	
Area (km ²):	
Population:	
Cancer Burden:	

Index

(lb/hr) * (X/Q)max / AF / Acute REL
 (ton/yr) * (X/Q) * MET * MPJ / Chronic REL

Target Organs	Acute	Chronic	Acute Pass/Fail	Chronic Pass/Fail
Respiratory system (lungs) - AL			Pass	Pass
Teeth - BN			Pass	Pass
Circulatory system - CV			Pass	Pass
Developmental - DEV	9.64E-06	3.36E-05	Pass	Pass
Endocrine system - END			Pass	Pass
	2.44E-03		Pass	Pass
Immune system - IMM	8.31E-06	1.76E-05	Pass	Pass
	8.31E-06		Pass	Pass
Neurological system - NS	1.33E-06	3.88E-05	Pass	Pass
Reproductive system - REP	9.64E-06		Pass	Pass
Respiratory system - RES	2.03E-03	1.68E-03	Pass	Pass
			Pass	Pass

A/N: 528834

Application deemed complete date:

10/28/11

rd Index Acute

$$HIA = [Q(lb/hr) * (X/Q)_{max}] * AF / \text{Acute REL}$$

HIA - Residential

Compound	AL	CV	DEV	EYE	HEM	IMM	NS	REP	RESP	SKIN
yde				2.62E-06					2.62E-06	
				4.28E-04						
including benzene from gasoline)			1.77E-06		1.77E-06	1.77E-06		1.77E-06		
tyde				8.87E-05						
ylene										
c Aromatic Hydrocarbon (PAHs)										
methyl benzene)			2.84E-07	2.84E-07			2.84E-07	2.84E-07	2.84E-07	
omers and mixtures)				3.55E-07					3.55E-07	
			2.05E-06	5.20E-04	1.77E-06	1.77E-06	2.84E-07	2.05E-06	4.32E-04	

Compound	HIA - Commercial									
	AL	CV	DEV	EYE	HEM	IMM	NS	REP	RESP	SKIN
Aldehyde				1.23E-05					1.23E-05	
Aldehyde (including benzene from gasoline)			8.31E-06	2.01E-03	8.31E-06	8.31E-06		8.31E-06	2.01E-03	
Alkene				4.16E-04						
Polycyclic Aromatic Hydrocarbon (PAHs)										
Alkylbenzene (including ethylbenzene)			1.33E-06	1.33E-06			1.33E-06	1.33E-06	1.33E-06	
Alkylbenzene (including ethylbenzene) and mixtures				1.67E-06					1.67E-06	
			9.64E-06	2.44E-03	8.31E-06	8.31E-06	1.33E-06	9.64E-06	2.03E-03	

ard Index Chronic

$$HIC = [Q(\text{ton/yr}) * (X/Q) * MET * MP] / \text{Chronic REL}$$

d	HIC - Residential												
	AL	BN	CV	DEV	END	EYE	HEM	IMM	KID	NS	REP	RESP	SKIN
yde (including benzene from gasoline) yde uene c Aromatic Hydrocarbon (PAHs) nethyl benzene) somers and mixtures)				3.30E-06			3.30E-06			3.30E-06		7.55E-07 2.63E-04	
				3.01E-06						3.01E-06 9.60E-07		4.66E-05 1.14E-06 3.01E-06 9.60E-07	
				6.31E-06			3.30E-06			7.27E-06		3.16E-04	

A/N: 528834

Application deemed complete date: 10/28/11

and Index Chronic (cont.)

HIC - Commercial												
AL	BN	CV	DEV	END	EYE	HEM	IMM	KID	NS	REP	RESP	SKIN
			1.76E-05			1.76E-05			1.76E-05		4.03E-06 1.40E-03	
			1.61E-05						1.61E-05 5.12E-06		2.49E-04 6.06E-06 1.61E-05 5.12E-06	
			3.36E-05			1.76E-05			3.88E-05		1.68E-03	

ad
 yde
 (including benzene from gasoline)
 hyde
 alene
 ic Aromatic Hydrocarbon (PAHs)
 (methyl benzene)
 isomers and mixtures)

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TAMCO, ID 18931

EQUIPMENT DESCRIPTION

APPLICATION NO. 537040

COOLING TOWER #3, COUNTER FLOW TYPE, COOLING TOWER DEPOT, MODEL CFF-181819-11-14, 2400 GPM, WITH A BRENTWOOD ACU-PAC CELLULAR MIST ELIMINATOR, MODEL CF80MAX.

APPLICATION NO. 537041

COOLING TOWER #6, COUNTER FLOW TYPE, COOLING TOWER DEPOT, MODEL CFF-242421-11-18, 3700 GPM, WITH A BRENTWOOD ACU-PAC CELLULAR MIST ELIMINATOR, MODEL CF80MAX.

APPLICATION NO. 537042

TITLE V/RECLAIM FACILITY MODIFICATION

BACKGROUND

Applications were received 12/29/11 under A/Ns 531292 and 531293 for existing cooling towers (also called #3 and #6). Applicant stated that the towers are 20-30 years old, and that they were previously believed to be exempt from permit. Compliance with New Source Review requirements was not expected, and denial of the permits was recommended. Final action on A/Ns 531292 and 531293 has not been taken at this time. The above applications, A/Ns 537040, 537041 and 537042, were received 5/2/12 for permits to construct to replace the old cooling towers with new Marley cooling towers. The information submitted was incomplete, and did not include any information on the mist eliminators. On 2/28/13, information was submitted for the above described Cooling Tower Depot cooling towers, which the company has decided to install instead. Water analysis was submitted 8/16/2013.

PROCESS DESCRIPTION

TAMCO is a steel manufacturer. Cooling tower #3 provides cooling water to the continuous caster. The water is used in direct contact with billets to quench the steel. The billets have a light coating of casting lubricant, which keeps the steel from sticking to the mold in the continuous caster. Cooling tower #6 provides cooling water to the roll mill. The water is used in direct contact with the rebar to quench the steel.

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EMISSION ESTIMATES

Default VOC emissions factors are available only for refineries and chemical plants; VOC emissions are not expected from other cooling towers. PM/PM10 emissions only are calculated. 100% of PM is assumed to be PM10 below 1000 TDS, less for higher concentrations (see figure 1, attached). The PM10 emission rate increases to a maximum at around a TDS of 4000 ppmw, then begins to decline. At higher TDS, the drift droplets contain more solids and therefore, upon evaporation, result in larger solid particles for any given initial droplet size.

Cooling tower #3

Basis:

Water recirculation rate: 2400 gpm
Total dissolved solids, ppmw: 3400 requested max, 600 ppm actual expected max
Drift loss: 0.0005%
Operating hours: 8760 hr/yr
Air flow rate: 218,505 ACFM (per submittal)

$$(2400 \text{ gal/min})(3400 \text{ parts}/10^6)(0.000005)(8.34 \text{ lb/gal})(60 \text{ min/hr})(8760 \text{ hr/yr}) = 179 \text{ \#PM/yr}$$

$$0.49 \text{ \# PM/day}$$

$$0.02 \text{ \# PM/hr}$$

$$0.00034 \text{ \# PM/min}$$

@600ppm (actual expected max, assumed to be 100% PM10)

$$(2400 \text{ gal/min})(600 \text{ parts}/10^6)(0.000005)(8.34 \text{ lb/gal})(60 \text{ min/hr})(24 \text{ hr/day})(1.0 \text{ PM10}) = 0.086 \text{ \#PM10/day}$$

@3400ppm (requested max, assumed to be 45% PM10)

$$(2400 \text{ gal/min})(3400 \text{ parts}/10^6)(0.000005)(8.34 \text{ lb/gal})(60 \text{ min/hr})(24 \text{ hr/day})(.45 \text{ PM10}) = 0.22 \text{ \#PM10/day}$$

@4000ppm (max PM10 emission expected, assumed to be 39% PM10)*

$$(2400 \text{ gal/min})(4000 \text{ parts}/10^6)(0.000005)(8.34 \text{ lb/gal})(60 \text{ min/hr})(24 \text{ hr/day})(.39 \text{ PM10}) = 0.225 \text{ \#PM10/day}$$

$$(0.00034 \text{ \#/min})(7000 \text{ grains/\#}) = 1.09 \text{ e-5 gr/cf}$$

$$(218,505 \text{ acfm})$$

*Calculated maximum PM10 emission at 4000 ppm is only slightly higher than at requested maximum 3400 ppm. Maximum emission will be assumed, and no limit on TDS will be required.

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Cooling tower #6

Basis:

Water recirculation rate: 3700 gpm
 Total dissolved solids, ppmw: 6700 requested max, 5000 actual expected max
 Drift loss: 0.0005%
 Operating hours: 8760 hr/yr
 Air flow rate: 388,929 (per submittal)

$$(3700 \text{ gal/min})(6700 \text{ parts}/10^6)(0.000005)(8.34 \text{ lb/gal})(60\text{min/hr})(8760 \text{ hr/yr}) = 543 \text{ \#PM/yr}$$

$$1.5 \text{ \# PM/day}$$

$$0.06 \text{ \# PM/hr}$$

$$0.001 \text{ \# PM/min}$$

@4000 ppm (max PM10 emission expected, assumed to be 39% PM10)

$$(3700\text{gal/min})(4000\text{parts}/10^6)(0.000005)(8.34\text{lb/gal})(60\text{min/hr})(24 \text{ hr/day})(.39\text{PM10})= 0.35 \text{ \#PM10/day}$$

@5000 ppm (actual expected max, assumed to be 30% PM10)

$$(3700 \text{ gal/min})(5000 \text{ parts}/10^6)(0.000005)(8.34 \text{ lb/gal})(60\text{min/hr})(24 \text{ hr/day})(.3) = 0.33 \text{ \#PM10/day}$$

@6700 ppm (requested max, assumed to be 20% PM10)

$$(3700 \text{ gal/min})(6700 \text{ parts}/10^6)(0.000005)(8.34 \text{ lb/gal})(60\text{min/hr})(24 \text{ hr/day})(.2) = 0.3 \text{ \#PM10/day}$$

$$(0.001 \text{ \#PM/min})(7000 \text{ grains/\#}) = 1.8 \text{ e-5 gr/cf}$$

$$(388,929 \text{ acfm})$$

RULE COMPLIANCE

Rule 212: Standards for approving permits

212(c)(1) Using the website greatschools, the closest schools, Cross & Crown Lutheran Pre-school (.5 mi), Windrows Elementary School, Etiwanda High School, La Petite Academy, and Heritage Village Kindercare (.6 mi each), are more than 1000 feet from the property line. A public notice is not required under this paragraph.

212(c)(2) PM10 emission increase does not exceed the daily maximums specified in R212(g). Public notice is not required.

212(c)(3) No toxics are added. Risk from toxics in the water is expected to be less than 1 in one million. A public notice is not required under this paragraph.

Rule 219(d)(3): Water cooling towers *not* used for evaporative cooling of process water

The cooling water comes into direct contact with process materials, thus is not eligible for the exemption. A permit is required.

Rule 401 – Visible Emissions

Compliance is expected.

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Rule 402- Nuisance

Existing cooling towers have not caused nuisance complaints. Compliance is expected.

Rule 404 – PM concentration.

Estimated PM concentrations are 1.09 e-5 gr/cf (tower #3) and 1.8 e-5 gr/cf (tower #6), which is less than the minimum chart allowance of 0.01 gr/cf

Complies

Rule 405 – Solid PM weight

Estimated PM emissions are 0.02 #PM/hr (tower #3) and 0.06 #PM/hr (tower #6), which is less than the minimum chart allowance of 0.99 #PM/hr

Complies

New Source Review

BACT

A drift rate of no more than 0.0005% of the circulating water flow rate is considered BACT/LAER for this operation, which will be achieved with high efficiency mist eliminators. Uncontrolled emissions without a drift eliminator would be more than 1 #/day, thus BACT requirements apply to both cooling towers. Compliance is expected

Air Quality Modeling

Not required for VOC

0.41 #PM/hr for non combustion sources (screening Table A-1)

Tower #3 emissions are estimated to be 0.02 #PM/hr – Compliance expected

Tower #6 emissions are estimated to be 0.06 #PM/hr – Compliance expected

Emissions Offsets

Facility is over the offset threshold for PM10 – offsets are required (facility has provided the offset)

The new towers do not qualify for the functionally identical replacement offset exemption since the old towers were not (and could not be) permitted, and offsets were not provided.

<u>A/N</u>	<u>PM10 #/day (x1.2)</u>
537040, cooling tower #3	0.225 (0)
537041, cooling tower #6	0.35 (0)
Total project	0.575 (1)

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Rule 1401 - Toxics

No toxic compounds will be added; however, there are some toxic materials in the water. Risk is expected to be less than one in one million.

Rule 1404 – Hex Chrome emissions from cooling towers

Hexavalent chromium containing water treatment chemicals will not be used in this equipment. Exempt per (f)(2).

Rule 3000 – Title V

This is a diminimus significant permit revision. 45 day EPA review is required.

RECOMMENDATION

Compliance with applicable rules and regulations is expected. Approval of conditional permits to construct are recommended once risk assessment is provided, and EPA review is completed.

droplet size distribution, a method is now available for calculating realistic PM₁₀ emission rates from wet mechanical draft cooling towers equipped with modern, high-efficiency drift eliminators and operating at medium to high levels of TDS in the circulating water.

Table 2. Resultant Solid Particulate Size Distribution (TDS = 11000 ppmw)

EPRI Droplet Diameter (μm)	Droplet Volume (μm ³) [2] ¹	Droplet Mass (μg) [3]	Particle Mass (Solids) (μg) [4]	Solid Particle Volume (μm ³)	Solid Particle Diameter (μm) [7]	EPRI % Mass Smaller
10	524	5.24E-04	5.76E-06	2.62	1.710	0.000
20	4189	4.19E-03	4.61E-05	20.94	3.420	0.196
30	14137	1.41E-02	1.56E-04	70.69	5.130	0.226
40	33510	3.35E-02	3.69E-04	167.55	6.840	0.514
50	65450	6.54E-02	7.20E-04	327.25	8.550	1.816
60	113097	1.13E-01	1.24E-03	565.49	10.260	5.702
70	179594	1.80E-01	1.98E-03	897.97	11.970	21.348
90	381704	3.82E-01	4.20E-03	1908.52	15.390	49.812
110	696910	6.97E-01	7.67E-03	3484.55	18.810	70.509
130	1150347	1.15E+00	1.27E-02	5751.73	22.230	82.023
150	1767146	1.77E+00	1.94E-02	8835.73	25.650	88.012
180	3053628	3.05E+00	3.36E-02	15268.14	30.780	91.032
210	4849048	4.85E+00	5.33E-02	24245.24	35.909	92.468
240	7238229	7.24E+00	7.96E-02	36191.15	41.039	94.091
270	10305995	1.03E+01	1.13E-01	51529.97	46.169	94.689
300	14137167	1.41E+01	1.56E-01	70685.83	51.299	96.288
350	22449298	2.24E+01	2.47E-01	112246.49	59.849	97.011
400	33510322	3.35E+01	3.69E-01	167551.61	68.399	98.340
450	47712938	4.77E+01	5.25E-01	238564.69	76.949	99.071
500	65449847	6.54E+01	7.20E-01	327249.23	85.499	99.071
600	113097336	1.13E+02	1.24E+00	565486.68	102.599	100.000

Figure 1: Percentage of Drift PM that Evaporates to PM₁₀

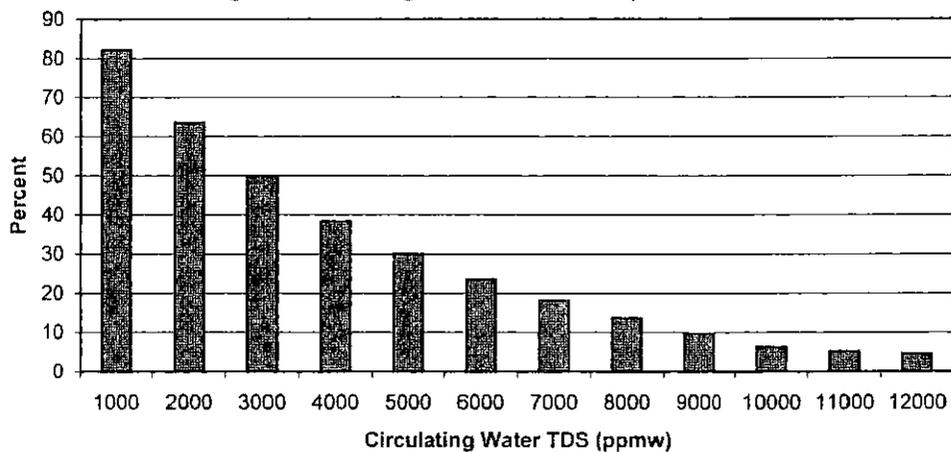
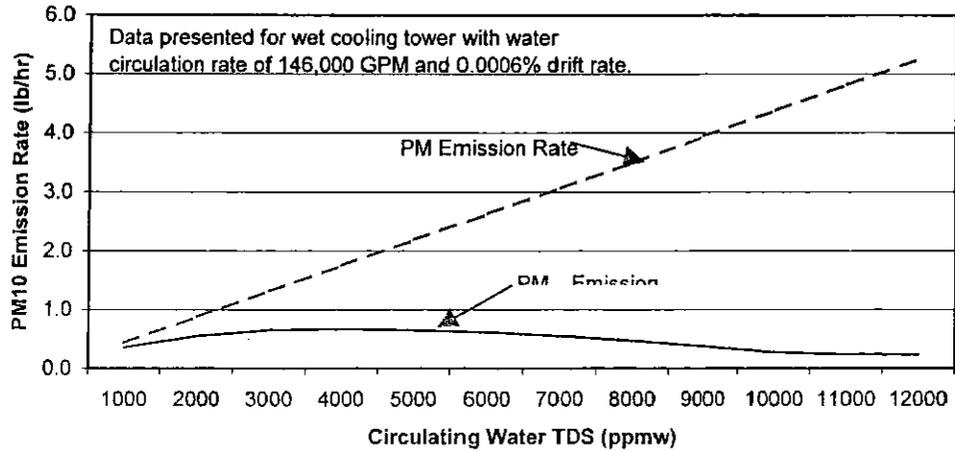


Figure 2: PM₁₀ Emission Rate vs. TDS



REFERENCES

1. EPA, 1995. Compilation of Air pollutant Emission Factors, AP-42 Fifth edition, Volume I: *Stationary Point and Area Sources*, Chapter 13.4 Wet Cooling Towers, <http://www.epa.gov/ttn/chief/ap42/>, United States Environmental Protection Agency, Office of Air Quality Planning and Standards, January.
2. Aull, 1999. Memorandum from R. Aull, Brentwood Industries to J. Reisman, Greystone, December 7, 1999.

KEY WORDS

Drift
Drift eliminators
Cooling tower
PM₁₀ emissions
TDS

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TAMCO, ID 18931

EQUIPMENT DESCRIPTION

APPLICATION NO. 540080

BILLET REHEAT FURNACE, D7, REGENERATIVE, 143.5 MMBTU/HR, WITH

2 PREHEAT BURNER PAIRS, REGENERATIVE, EACH BURNER 14 MMBTU/HR, EACH PAIR
14 MMBTU/HR TOTAL

2 PREHEAT BURNER PAIRS, REGENERATIVE, EACH BURNER 25 MMBTU/HR, EACH PAIR
25 MMBTU/HR TOTAL

4 HEAT BURNER PAIRS, REGENERATIVE, EACH BURNER 11.2 MMBTU/HR, EACH PAIR 11.2
MMBTU/HR TOTAL

3 SOAK BURNER PAIRS, REGENERATIVE, EACH BURNER 3.1 MMBTU/HR, EACH PAIR 3.1
MMBTU/HR

2 SOAK BURNER PAIRS, REGENERATIVE, EACH BURNER 5.7 MMBTU/HR, EACH PAIR 5.7
MMBTU/HR

APPLICATION NO. 540078

TITLE V/RECLAIM FACILITY MODIFICATION

BACKGROUND

Previous A/N 313809 was submitted to replace the existing burners with burners of the same rating, total 120.4 mmbtu/hr. Based on current information, burners with similar, but not identical, ratings were actually installed, total 121.5 mmbtu/hr operating in regenerative mode (243 mmbtu/hr total burner rating). They subsequently upgraded four of the preheat burners to 25 mmbtu/hr, for a total rating of 143.5 mmbtu/hr operating in regenerative mode (287 mmbtu/hr total burner rating). Company initially stated that they planned to replace this furnace, but they no longer plan to do so in the foreseeable future.

PROCESS DESCRIPTION

TAMCO is a steel manufacturer. The billet reheat furnace reheats 5' X 5' X 20' billets to 2000F. The regenerative burners are arranged in sets of two with only one burner operating at a time. While one burner is operating the flue gas is directed through the heat recovery combustion air preheater for the other (non-operating) burner.

EMISSION ESTIMATE

See calculation sheet

NOx based on requested 166 ppm (default)

Limited to 120.4 MMBTU/hr

$(120.4 \text{ MMBTU/hr}) \times (24 \text{ hr/day}) / (1050 \text{ BTU/CF}) = 2.752 \text{ MMCF/day}$ (limited to 2.2 MMCF/day)

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RULE COMPLIANCE

Rule 212: Standards for approving permits

212(c)(1) Using the website greatschools, the closest schools, Cross & Crown Lutheran Pre-school (.5 mi), Windrows Elementary School, Etiwanda High School, La Petite Academy, and Heritage Village Kindercare (.6 mi each), are more than 1000 feet from the property line. A public notice is not required under this paragraph.

212(c)(2) 2.2 MMCF/day is retained, so no increase in daily potential to emit. Public notice is not required under this paragraph.

212(c)(3) Minimal toxics from natural gas combustion. No increase in daily allowed gas usage, no increase in toxic risk. A public notice is not required under this paragraph.

Rule 401 – Visible Emissions

Compliance is expected.

Rule 402- Nuisance

Compliance is expected.

Rule 404 – PM concentration.

Compliance is expected

Rule 405 – Solid PM weight

Compliance is expected

New Source Review

BACT

SCR is achieved in practice for a 530 mmbtu/hr steel reheat furnace operating at 2300F, achieving 22 ppm NOx. Without an SCR, < 55 ppm is achieved (permitted at 60 ppm) for a 533 mmbtu/hr reheat furnace. Applicant requests 166 ppm as previously conditioned. Does not meet BACT/LAER requirements for NOx. Uses natural gas, which is BACT for the other criteria pollutants.

Air Quality Modeling

Increase in emissions based on rating increase exceeds table screening level for NOx. Compliance is not expected at 166 ppm.

Based on records submitted, actual usage does not exceed 120.4 mmbtu/hr (as previously permitted). Limit to (120.4 mmbtu/hr)(CF/1050 btu) = 114,667 CF/hr (as agreed to by RECLAIM admin)

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With the hourly limit, there is no increase in hourly PTE, therefore BACT and modeling are not required under R2005 (NOx RECLAIM NSR).

Emissions Offsets

Daily gas usage limit of 2.2MMCF/day is retained.

No increase in 30 day average PTE. Offsets are not required.

Rule 1401 - Toxics

Minimal toxics expected from natural gas combustion. No increase in daily allowed gas usage, no increase in toxic risk.

Rule 3000 – Title V

This is a de minimus significant permit revision. 45 day EPA review is required.

RECOMMENDATION

Issue a permit to operate with limits on the hourly and daily gas usage.

EMISSIONS FOR FIRING ON NATURAL GAS
(OVENS, FURNACES, HEATERS, ETC.)

Emission factors are from form B-1
Except NOx which is calculated from the ppm of NOx

Maximum Burner Rating in BTU/hr =	120,400,000 BTU/hr (limit)
Max conditioned fuel usage =	66,000,000 CF/mo (2.2 MCF/day)
Previously conditioned fuel usage =	66,000,000 CF/mo
Average Operating Schedule =	24 hr/day
Maximum Operating Schedule =	24 hr/day
Expected emission of NOx=	166 ppm
Average Loading=	100.0%
Maximum Loading =	100.0%
Maximum operating days per month =	30 days

AVERAGE EMISSIONS

RHC	=	0.8027 lb/hr	19.2640 lb/day
NOx	=	24.1835 lb/hr	580.4051 lb/day
SO2	=	0.0688 lb/hr	1.6512 lb/day
CO	=	4.0133 lb/hr	96.3200 lb/day
PART	=	0.8600 lb/hr	20.6400 lb/day

MAXIMUM EMISSIONS

RHC	=	0.8027 lb/hr	19.2640 lb/day
NOx	=	24.1835 lb/hr	580.4051 lb/day
SO2	=	0.0688 lb/hr	1.6512 lb/day
CO	=	4.0133 lb/hr	96.3200 lb/day
PART	=	0.8600 lb/hr	20.6400 lb/day

Thirty day average emissions

RHC	=	15.40 lb/dy	5544 lb/yr
NOx	=	467.46 lb/dy	168284 lb/yr
SO2	=	1.32 lb/dy	475 lb/yr
CO	=	77.00 lb/dy	27720 lb/yr
PART	=	16.50 lb/dy	5940 lb/yr

Monthly Emissions

RHC	=	462.00 lb/mo
NOx	=	14023.68 lb/mo
SO2	=	39.60 lb/mo
CO	=	2310.00 lb/mo
PART	=	495.00 lb/mo

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TAMCO, ID 18931

EQUIPMENT DESCRIPTION

APPLICATION NO. 549173

BILLET REHEAT FURNACE, D7, REGENERATIVE, 143.5 MMBTU/HR

MODIFICATION TO ADD A NEW STACK AND RECONFIGURE THE DUCTWORK

1. COMBINED STACK, S86
2. MAIN STACK, BURNER EXHAUST, S87
3. FURNACE DAMPER STACK, S88

APPLICATION NO. 549172

TITLE V/RECLAIM FACILITY MODIFICATION

BACKGROUND

In the original design of the reheat furnace, the damper operated to control excess pressure in the furnace, which was expected during startup. In 1995-96, burners were upgraded and CEMS was installed on the main stack. Additional burner upgrades were made without a permit to construct (see A/N 540080, which was submitted 6/2012). Due to the additional heat, approximately 20 % of the exhaust gases from the combustion of natural gas discharges from the damper auxiliary (bypass) stack, and approximately 80% from the main stack, which has a CEMS (see Figure 1, attached). The bypass stack emissions were not reported previously; the company is currently reporting bypass stack NOx emissions using RECLAIM missing data procedures.

A/N 540080 covers existing burner modifications on reheat furnace D7. This application covers proposed stack and duct modifications to vent all exhaust through a CEMS. The applicant proposes to connect the main and damper stacks to a new combined stack, which will have a new CEMS (See Figure 2, attached).

PROCESS DESCRIPTION

This is an existing facility that is in the business of recycling ferrous scrap metal into concrete reinforcing bars (rebar). The billet reheat furnace reheats 5' X 5' X 20' billets to 2000F.

EMISSION ESTIMATE

See application no. 540080. No change in emission by this modification to modify the stacks and ducting.

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RULE COMPLIANCE

Rule 212: Standards for approving permits

212(c)(1) Using the website greatschools, the closest schools, Cross & Crown Lutheran Pre-school (.5 mi), Windrows Elementary School, Etiwanda High School, La Petite Academy, and Heritage Village Kindercare (.6 mi each), are more than 1000 feet from the property line. No increase in emissions due to this modification. A public notice is not required under this paragraph.

212(c)(2) No increase in emissions due to this modification. Public notice is not required under this paragraph.

212(c)(3) No increase in emission due to this modification. A public notice is not required under this paragraph.

Rule 219: Equipment not requiring a written permit

(c)(2): Structural changes that cannot change the quality, quantity, nature or quantity of air contaminant emissions.

(c)(9): Hoods, stacks, or ventilators.

A decision was made to require a permit application so as to add a condition requiring all stack emissions to be vented to a continuous emissions monitor.

Rule 401 – Visible Emissions

Compliance is expected.

Rule 402- Nuisance

Compliance is expected.

Rule 404 – PM concentration.

Compliance is expected

Rule 405 – Solid PM weight

Compliance is expected

New Source Review

No change in emissions due to this modification. New Source Review does not apply.

Rule 1401 - Toxics

No increase in emissions due to this modification. New Source Review for toxics does not apply.

Regulation XX – RECLAIM

Currently, only the main stack is monitored by a continuous emissions monitor; damper (bypass) stack emissions are being reported using missing data procedures. The damper stack, along with the main stack, will be connected to a new combined stack with a new CEMS.

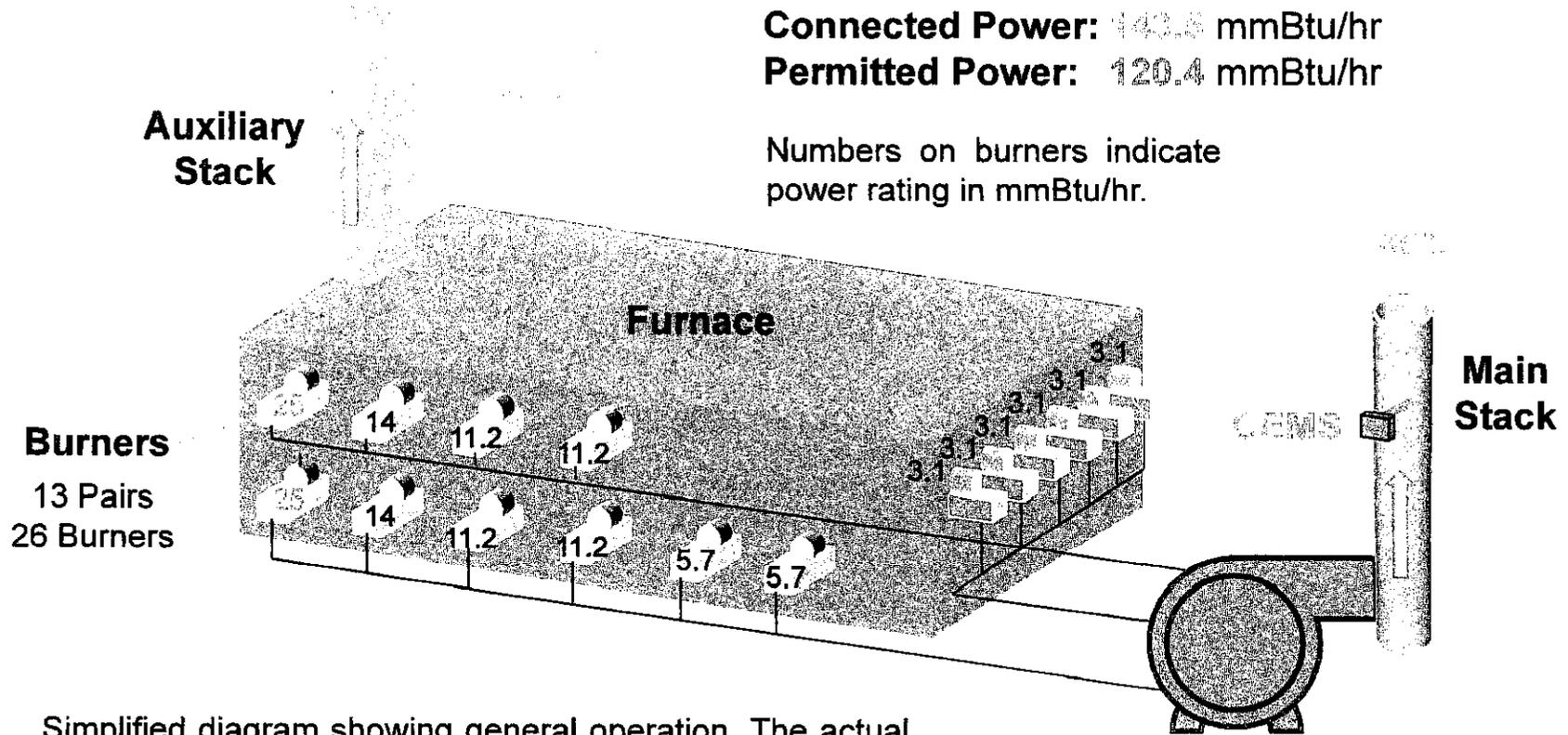
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Regulation XXX – Title V
This is a minor permit revision.

RECOMMENDATION

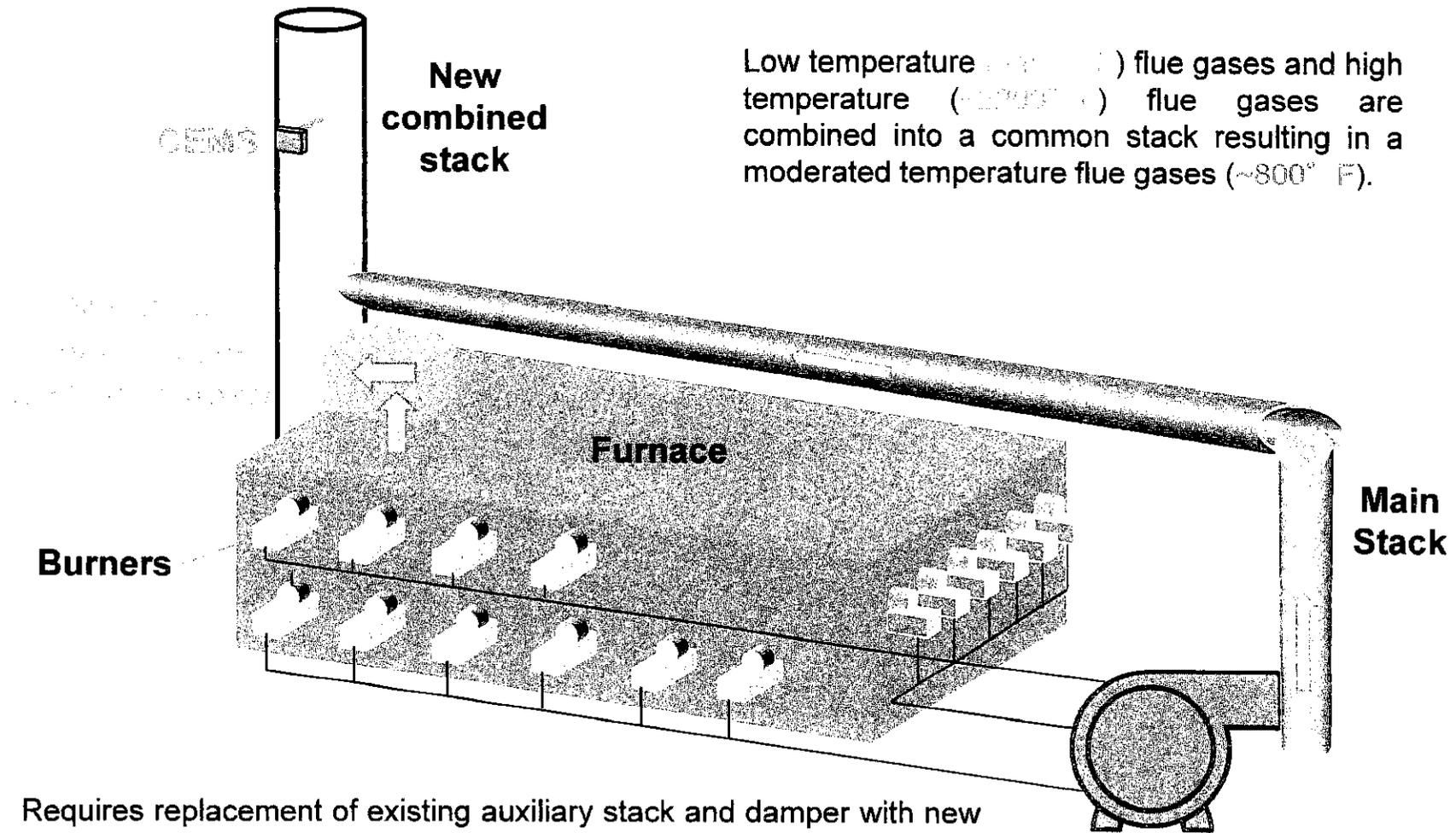
Issue the permit to construct along with the Title V renewal.

Figure 1 - EXISTING REHEAT FURNACE OVERVIEW



Simplified diagram showing general operation. The actual furnace has two exhaust fans feeding the main stack. The top 25 mmBtu/hr preheat zone burner beds are above the furnace instead of being mounted below the burner.

Figure 2 - RECOMMENDED SOLUTION



Requires replacement of existing auxiliary stack and damper with new refractory duct work and slide gate damper exiting from roof of furnace. Combined stack height and diameter will be sized to ensure proper mixing and uniform flow.

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PERMIT TO CONSTRUCT ANALYSIS

FACILITY MAILING ADDRESS

TAMCO
P.O. Box 325
Rancho Cucamonga, CA 91739

EQUIPMENT LOCATION

TAMCO
12459-B Arrow Route
Rancho Cucamonga, CA 91739

(ID# 018931, Title V, NOx/SOx RECLAIM facility)

EQUIPMENT DESCRIPTION

A/N 552123

Modification to Baghouse C5, current P/O G9810, A/N 510538

BY THE ADDITION OF A DUSTLESS SPOUT ON THE SCREW CONVEYOR FOR LOADING, DESCRIBED AS FOLLOWS:

D6 - CONVEYOR, SCREW, WITH DUSTLESS LOADING SPOUT.

AND THE ADDITION OF A HOOD AND DUCT OVER A LADLE STIR STATION, E85

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A/N 552124

New

C84 -BAGHOUSE, DCL, MODEL DC49-58, PULSE JET CLEANING, WITH 49 FILTER BAGS, 5.5 IN DIA X 4 FT 8 IN L, 358 SQ.FT. TOTAL FILTER AREA, WITH A 7.5-HP EXHAUST FAN, VENTING A BAGHOUSE DISCHARGE SCREW CONVEYOR.

A/N 552125

RECLAIM/TITLE V PERMIT REVISION

This application is for the purpose of incorporating the changes to the RECLAIM/Title V permit described in this report.

HISTORY

The subject applications have a validated receipt date of 6/4/13.

A/N 552123 was submitted for a P/C modification to the main baghouse C5 to replace the existing skirt on the end of discharge screw conveyor D6 with a dustless loading spout.

A/N 552124 was submitted for a P/C for a new baghouse to vent the above described screw conveyor during loading of railcar or truck. Original submittal indicated a 183 sq. ft. Micropul baghouse. Revised information was submitted 9/11 and 9/12/13 for a 358 sq.ft. DCL baghouse to be installed instead.

A/N 552125 was submitted for the RECLAIM/Title V revisions to the facility permit based on the other applications in this report.

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The following compliance activity was found in District records, computer database, during the past 5 years:

Complaints:

- 224010, 5/29/12, for dust emissions from facility lot. District inspector made observations at the facility on 6/1/12, and did not observe any rule violations.
- 223742, 5/15/12, for dust emissions within the facility, by facility employee. District inspector made observations at the facility on 5/17/12 and issued a Notice to Comply (E10650) for not complying with Rule 403 requirements.

Notices to Comply:

- E10650, 5/15/12, to not cause or allow fugitive dust emissions from active operations, storage piles, or disturbed surface area such that the emission exceeds 20% opacity. Implement Best Available Control Measures to suppress emissions. (Rule 403) Deemed in compliance, by District inspector, after observing facility during operation, on 5/16/12.
- E06740, 8/22/12 to provide documentation, of various types required by H & S Code 42303.
- E06739, 8/16/12 to provide copy of records demonstrating compliance with natural gas usage limit of 2.2 MMcu.ft./day. Determine location at readout information for temperature gauge at water-cooled elbow in exhaust system. Provide copy of tune-up record demonstrating compliance with fuel-to-air ratio. Provide copy of proof that facility only receives scrap from providers that participate in EPA approved program for removal of mercury switches. (Rule 3002) Deemed in compliance 2/28/02.
- E06737, 7/13/12 to provide a method of determining the amount of lead processed and records of

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lead processed in the last 5 years (7/1/07 though 7/1/12). Provide copies of source test(s) conducted on re-heat furnace emissions. (Rule 1420)

- E05242, 12/16/11 issue date, 7/1/10 violation date, to ensure timely submission of Process unit and Rule 219 electronic reports and provide permit status of silo and storage tank. (Rule 2012, H & S Code 42303)
- E01178, 8/9/12 to provide documentation of various types per H & S Code 42303.
- E00701, 9/16/10 issue date, 7/1/09 violation date, to submit annual compliance certification, in a timely manner, as required in Section K of the permit. (Rule 3002(c)(1)) Deemed in compliance, by District inspector, on 9/29/10.
- D28698, 4/26/13, to 1) Provide monthly records of total scrap metal processed from January 2004 to present. 2) Provide monthly records of total amount of oil filters processed from January 2004 to present. (H & S Code 42303) Deemed in compliance, by District inspector, on 5/3/13.

Notices of Violation:

- P53133, 1/29/13 issue date, 6/30/12 violation date, for failure to reconcile quarterly NOx emissions in the third and last quarters of compliance year 2011. NOx Emissions from the beginning of the 2011 compliance year through the end of the third and last quarters exceeded annual NOx allocation. (Rule 2004)
- P49165, 8/8/12 issue date, 6/8/12 violation date, for 1) Failure to completely vent emission points to collection system; 2) Failure to wash down, vacuum, or wet-mop at least once a week, or maintain with the use of non-toxic chemical dust suppressants, surfaces that accumulate lead-containing dust subject to vehicular or foot traffic;

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and 3) failure to install ambient air quality monitoring equipment. (Rule 1420)

PROCESS DESCRIPTION

This is an existing facility that is in the business of recycling ferrous scrap metal into concrete reinforcing bars (rebar). This facility is operating an electric arc furnace (EAF), three ladle heaters, a billet heating furnace, a lime storage silo, a dolomite silo, two carbon storage silos, a gasoline dispensing facility, four engines driving emergency generators, and one baghouse to control PM emissions.

The subject modification is to vent the discharge of the main baghouse (C5) during loading into railcars or trucks.

In addition, they plan to add a new hood over an unpermitted ladle stir station that will be connected to baghouse C5. A blower will not be used.

EVALUATION

The purpose of the dustless spout and new baghouse is to control fugitive emissions from the baghouse discharge.

Railcar loading

Basis:

84,400 pounds/day, max (applicant info)

0.01 #PM/T (AP-42 Metallic minerals processing, material handling and transfer)

99% overall control assumed with dustless spout and baghouse

100% of controlled PM is assumed to be PM10 (standard District assumption)

$$(0.01 \text{ #PM/T}) \left(\frac{84400 \text{ #/day}}{2000 \text{ #/T}} \right) (1-.99) = 0.004 \text{ #PM-PM10/day}$$

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Air to cloth ratio

New baghouse C84

$$2000/358 = 5.6$$

Per EPA Lesson 3, Fabric Filter Design Variables, typical air-to-cloth ratio for pulse-jet cleaning is 1 to 7.5:1

Existing baghouse C5

No change in air to cloth ratio by the addition of the stir station hood, as it will not have a blower. The stir station is already indirectly vented to baghouse C5 through the building.

RULES COMPLIANCE

Rule 212:

(c)(1) - This section requires a public notice for all new and 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 the nearest school from this equipment is approximately 7,300 feet from the outer boundary of a school. Therefore no public notice is required.

(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 any emission increase. Therefore, a Rule 212(c)(2) notice will not be required for this project.

(c)(3) - This section requires a public notice for all new or modified permit unit with increases in emissions 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 any emission increase of toxic emissions associated with the

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operation. Therefore Public Notice is not required under this section of the rule.

(g) - Project emissions are much less than threshold limits. No increase in emissions associated with this project.

Therefore, no public notice is required.

- Rule 401 - No visible emission is expected with proper operation of the equipment.
- Rule 402 - No nuisance is expected with proper operation of the equipment.
- Rule 403 - No excessive fugitive dust is expected with proper operation of the equipment.
- Rule 404 - Compliance is expected.
- Rule 405 - Compliance is expected.
- Rule 1155 - PM control devices
New baghouse C84 is Tier 1 (\leq 500 sq ft filter surface area). Weekly visible emissions monitoring and recording is required, and has been included as a permit condition. Compliance is expected

Existing baghouse C5 is Tier 3 ($>$ 7500 sq ft filter surface area). Has a bag leak detector, and permit condition requiring testing every five years.
Complies

- Reg. XIII - New Source Review
No increase in emissions, therefore New Source Review does not apply
- Rule 1401 - Toxics
No increase in emissions, therefore New Source Review for toxics does not apply
- Rule 1420 - Emissions standards for lead
The baghouse dust contains lead, and the discharge into railcars or trucks is an emission point that is required to be controlled. Compliance will be achieved for this emission source with the addition of the dustless spout vented to the new baghouse.
- Reg. XXX - Title V

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This is a minor permit revision. 45 day EPA notice is required.

RECOMMENDATION

A/Ns 552123, 552124 - Approve applications as described in this report and facility permit.

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TAMCO, ID 18931

EQUIPMENT DESCRIPTION

APPLICATION NO. 555557

LADLE HEATER D1, 11.9 MMBTU/HR

MODIFICATIONS AS FOLLOWS :

1. CHANGE THE COVER
2. MOVE AND REPLACE THE BURNER WITH AN IDENTICAL BURNER, NORTH AMERICAN 4575-10-B HIRAM, 11.9 MMBTU/HR
3. STACK S89, WITH A 20 HP BLOWER VENTING DIRECTLY TO OUTSIDE ATMOSPHERE

APPLICATION NO. 555558

LADLE HEATER D2, 16.4 MMBTU/HR

STACK S90, WITH A 20 HP BLOWER VENTING DIRECTLY TO OUTSIDE ATMOSPHERE

APPLICATION NO. 555559

LADLE HEATER D3, 16.4 MMBTU/HR

STACK S91, WITH A 20 HP BLOWER VENTING DIRECTLY TO OUTSIDE ATMOSPHERE

APPLICATION NO. 555556

TITLE V/RECLAIM FACILITY MODIFICATION

BACKGROUND

A/Ns 528834, 528835, 528839 cover existing burner modifications for the three ladle heaters. The above applications cover proposed duct modifications to vent the exhaust gases outside the building, and a proposed burner modification for heater D1.

PROCESS DESCRIPTION

The ladle heaters are used to preheat empty ladles prior to use for transporting molten steel throughout the melt shop. The combustion gasses from the ladle heaters currently exhaust into the air inside the melt shop, and indirectly to baghouse C5 via the melt shop canopy. To reduce the heat load in the melt shop, and improve its capture efficiency, the ladle heaters have been relocated within the melt shop, and additional ductwork will be installed to vent the heaters outside the building.

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EMISSION ESTIMATE

See A/Ns 528834, 528835, 528839, and calculation sheet, attached

No change in the maximum potential to emit by these modifications, as the current permit does not require venting to control, and no control was assumed in previous calculations.

An unknown increase in actual emissions of particulate matter, as the exhaust gases will be vented directly outside rather than into the building (and indirectly to baghouse C5 via the melt shop canopy). Capture and control efficiency are unknown, but was **previously assumed to be zero** for calculation purposes.

If assume 50% capture efficiency and 99% baghouse efficiency (49.5% overall)
 $(4.5 \text{ #PM/day, average})(0.495) = 2.23 \text{ #/day PM/day, average (three combined)}$
 Less than 1 #PM/day increase, average, per ladle heater

RULE COMPLIANCE

Rule 212: Standards for approving permits

212(c)(1) Using the website greatschools, the closest schools, Cross & Crown Lutheran Pre-school (.5 mi), Windrows Elementary School, Etiwanda High School, La Petite Academy, and Heritage Village Kindercare (.6 mi each), are more than 1000 feet from the property line. A public notice is not required under this paragraph.

212(c)(2) PM10 emission increase does not exceed the daily maximums specified in R212(g). Public notice is not required under this paragraph.

212(c)(3) Risk is less than one in one million. A public notice is not required under this paragraph.

Rule 219: Equipment not requiring a written permit

(c)(2): Structural changes that cannot change the quality, quantity, nature or quantity of air contaminant emissions.

Moving the equipment within the building does not impact emissions. However, venting directly outside rather than into the building and indirectly to a baghouse has the potential to somewhat increase particulate matter emissions, even though the calculated PTE will not increase.

(c)(3): Identical replacement in whole or in part of any equipment where a permit to operate had previously been granted

Ladle heater D1 burner replacement is identical, but is going to be installed in a different location due to the cover change.

(c)(9): Hoods, stacks, or ventilators

A decision was made to require permit applications

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Rule 401 – Visible Emissions
Compliance is expected.

Rule 402- Nuisance
Compliance is expected.

Rule 404 – PM concentration.
Compliance is expected

Rule 405 – Solid PM weight
Compliance is expected

New Source Review

1306 (d)(2) Determination of required offsets and BACT applicability - Modification of existing source
Net emissions increase after the modification shall be calculated pursuant to Rule 1306(b) which is the post-modification potential to emit minus
(A) The permitted or allowable pre-modification potential to emit

The existing permit does not require venting to the baghouse, and PM offsets were calculated assuming no control. No change in calculated PTE due to this modification. Offsets and BACT are not required.

Uncontrolled PM emissions are less than the modeling screening levels.

No change to NOx, SOx, CO, RHC emissions, as a baghouse only controls PM. NSR does not apply

Rule 1401 - Toxics

Risk is less than one in one million. See risk analysis under A/Ns 528834, 528835, 528839.

Regulation XX – RECLAIM

No change in RECLAIM pollutant emissions due to this modification

Regulation XXX – Title V

This is a de minimis permit revision; 45 day EPA notice is required.

RECOMMENDATION

Issue the permit to construct/operate along with the Title V renewal.