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PERMIT TO CONSTRUCT ANALYSIS

FACILITY MAILING ADDRESS

Building Materials Manufacturing Corporation
11800 Industry Avenue
Fontana, CA 92337

EQUIPMENT LOCATION

11800 Industry Avenue
Fontana, CA 92337

(ID# 119940 - Title V facility)

EQUIPMENT DESCRIPTION

A/N 535769

Modification, prior P/O F76247, A/N 428205

By addition of the following:

- TWO AGITATORS, 10-HP EACH.

Proposed description:

TANK, T-2C, ASPHALT STORAGE, 30,000 GALLON CAPACITY, WITH A 25-HP UNLOADING PUMP, AND TWO AGITATORS, 10-HP EACH.

A/N 535775

Title V permit revision

This application is for the purpose of changing the Title V facility permit, based on the specific changes identified under the other application in this report.

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HISTORY

The subject applications have a validated receipt date of 4/26/12.

A/N 535769 was submitted for a Permit to Construct (P/C) to modify an asphalt storage tank. The modification includes addition of two agitators. No other changes are proposed, but a clarification is made to the description to be "Asphalt Storage" in lieu of the current description as "Asphalt Coating Storage". No changes to the material stored is proposed.

A/N 535775 was submitted for the purpose of changing the Title V facility permit based on the changes described above.

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

Complaints - None found.

Notices to Comply:

- P55214, 10/6/09 issue date, 5/1/08 violation date, for modifying/removing equipment without first obtaining a Title V permit. Deemed in compliance, by District inspector, on 11/6/09. (Rule 3002)

Notices of Violation - None found.

PROCESS DESCRIPTION

The facility produces asphalt roofing products. The subject equipment, stores asphalt, and is vented to permitted ESP's (P/O's F76243, and F76258, with corresponding A/N's 422852, and 428217).

EVALUATION

A/N 535769

There is no proposed change in the process weight rate, and the addition of agitators is not expected to change the emission

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rate. Therefore, there will be no change to the emissions. Previous NSR emission values will be corrected as follows, based on the original NSR entries under P/O E04962, A/N 01162B:

	<u>Previous permit NSR entry</u>	<u>Original permit NSR entry</u>
PM/PM10		
R1:	0.04 lb/hr	0.4 lb/hr
R2:	0.04 lb/hr	0.02 lb/hr

(No change to emissions has been proposed from original evaluation through subsequent modifications, and change of operator.)

Assumption: PM assumed to be all PM10, as worst case.

Given: (from original evaluation under P/O E04962, A/N 01162B)
- ESP emission guaranteed: 0.04 gr/scf
- Flow rate: 50 scfm

Emissions: (note, differences from NSR entries due to rounding)

R2: (controlled, hourly, based on above)
= (50 scfm x 0.04 gr/scf x 60 min/hr)/(7,000 gr/lb)
= 0.017 lb/hr

R1: (uncontrolled, hourly, assumed 95% control eff.)
= 0.017 lb/hr x 1/(1-0.95)
= 0.34 lb/hr

Daily: (24 hrs/day)
Uncontrolled
PM/PM10: 8.2 lbs/day
Controlled
PM/PM10: 0.41 lb/day

30-day average: (same as daily controlled, based on 7 days/wk)
PM/PM10: 0 lb/day (rounded from 0.41 lb/day)

Annual: (Controlled daily x 365 days/yr)
PM/PM10: 150 lbs/yr ==> 0.1 ton/yr

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RULES COMPLIANCE

Rule 212 - Continued compliance is expected.
Rules 401, 402, 403, 404, 405 - Continued compliance is expected.
Reg. XIII - BACT is an ESP, an ESP is used. No increase in emissions is proposed, and modeling or offsets are not required.
Reg. XXX - This revision is considered a "**Minor Permit Revision**". Applicable monitoring conditions will be included, as necessary in the facility permit.
EPA Grant 105 - Not required as there is no proposed emission increase.
Stack data sheet - No required as there is no proposed emission increase.

RECOMMENDATION

A/N 535769 - Approve for P/C as described in this report, and facility permit.
A/N 535775 - Approve Title V permit revision based on this report.