

<b>SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</b>  <b>ENGINEERING AND COMPLIANCE DIVISION</b> <i>Coating, Printing, Plating, Military &amp; Entertainment Operations</i> <b>APPLICATION PROCESSING AND CALCULATIONS</b>	PAGE	1 of 11
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	PROCESSED BY	GS
	REVIEWED BY	SMKE
	DATE	02/17/12

**PERMIT TO CONSTRUCT NEW FLEXPRESS  
PERMIT TO OPERATE-C/C ON TWO FLEXPRESSES & MODIFY SILO**

<b>Applicant's Name</b>	GEORGIA-PACIFIC CORRUGATED LLC
<b>Company I.D.</b>	153033
<b>Mailing Address</b>	6300 REGIO AVE., BUENA PARK, CA 90620
<b>Equipment Address</b>	6300 REGIO AVE., BUENA PARK, CA 90620

**EQUIPMENT DESCRIPTION**

APPLICATION NO. 526633 (New Construction, D56)-P/C

FLEXOGRAPHIC PRINTING PRESS, MARTIN MFG., MODEL DRO 1632 NT HBL, 4 COLOR, 129 INCH SHEET WIDTH, WITH A ROTARY DIE-CUTTER.

APPLICATION NO. 526637 (RECLAIM/Title V Revision)

RECLAIM Amendment/De Minimis Significant TV Revision

APPLICATION NO. 527879 (change of cond., D51, prev. appl. no. 473243)-P/O

PRINTING PRESS, FLEXOGRAPHIC, LANGSTON, MODEL NO. SATURN II, THREE COLOR, 100 INCH SHEET WIDTH, WITH A FOLDER GLUER, NO. 38.

APPLICATION NO. 527880 (change of cond., D55, prev. appl. no. 498531)-P/O

PRINTING PRESS, FLEXOGRAPHIC, NO. 125, WARD, MODEL NO. 15000, THREE COLOR, 66 IN W. X 113 IN L. MAXIMUM SHEET SIZE WITH A ROTARY DIE CUTTER.

APPLICATION NO. 529447 (modification, D33, prev. appl. no. 473239)-P/O

STORAGE SILO, CORN STARCH, 66 FT. HIGH, 12 FT. DIAMETER, WITH A CARTRIDGE BIN VENT, 18 9 FILTERS, EACH 5.5 INCH DIAMETER X 36 INCH LONG.

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<b>HISTORY</b>
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Georgia-Pacific Corrugated LLC submitted the above permit applications to construct/operate a new flexographic printing press and correct permit conditions and permit unit description.

Application no. 526633 was filed for permit to construct a new Martin flexographic printing press with rotary die cutter that will replace two existing flexographic printing presses (D4 & D51). The applicant operates similar flexographic presses at this location.

The facility requested to change the Rule 1401 permit condition (B59.3 for D51, and B59.5 for D55) for two flexo presses, D51 and D55 so they can use inks which contain copper. Copper is listed as a TAC in Rule 1401, however since the materials used in the flexographic printing presses are not atomized, any solids contained in the inks would not become airborne, therefore copper would not be emitted. The word “volatile” will be added to the condition which will allow the use of copper or any other solid TACs listed in Rule 1401 contained in the inks.

For Device D51 (add “volatile”)

*B 59.3 The operator shall not use the following materials in this device:*

*Materials containing volatile toxic air contaminants identified in Rule 1401, Table I with an effective date of May 2, 2003 or earlier, with the exception of methyl alcohol (CAS # 67-56-1), vinyl acetate (CAS # 108-05-4) and acetaldehyde (CAS # 75-07-0).*

*Materials containing more than 0.004% by weight acetaldehyde.*

For Device D55 (add “volatile”)

*B 59.5 The operator shall not use the following materials in this device:*

*Materials containing volatile toxic air contaminants identified in Rule 1401, Table I with an effective date of March 7, 2008 or earlier, with the exception of ammonia (CAS # 7664-41-7).*

The application to modify the starch storage silo D33 was filed to update the number of filters in the bin vent. During an internal audit, the facility found that the bin vent on the silo has 9 filters and not 18 as described in the permit wording. The size of each filter is the same, just the number of filters is different. Records on the previous application no. 473239 (change of operator) has the same description as in the existing facility permit for this equipment. Upon looking in the detail of previous application no. 315091 under which the equipment was originally permitted, the data submitted indicated 18 cartridge filters. Based on the company’s recent communication with the equipment manufacturer, the bin vent always had 9 filters since they do not sell a unit with 18 filters. The facility sent a video of a tanker filling the storage silo which clearly indicated that there were no particulate emissions as a result of silo filling. The bin vent is working as expected.

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A facility-wide VOC emission limit of 2700 lbs/month (90 lbs/day), excluding emissions from the waxer-coater, has already been established for this facility. The company did not request any facility wide VOC emission increase from this project. The new press is a functionally identical replacement and will operate under this monthly facility cap. The presses to be replaced have no individual equipment VOC caps, only the facility cap of 2700 lb/month. Hence, there will not be any net VOC emission increase under this project. The change of permit conditions on presses under A/Ns 527879 and 527880 and correction of no. of filters on the storage silo under A/N 529447 have no impact on any criteria pollutant emissions.

The facility has a facility-wide HAP cap (10 tons/yr for single HAP and 25 tons/yr for combined HAPs) under Condition F2.2 so that they can be exempt from the NESHAP requirements under 40CFR63 Subpart DDDD.

The District database shows that the applicant has not received any odor nuisance or visible emission complaints from the public in the last two years. The database also indicated that the applicant has not received any Notices to Comply or Notice of Violations from the District inspectors.

There are no schools located within 1000 feet from the property-line. No public notice will be required for this project as VOC emissions will be no greater than the 30 lbs/day threshold limit. Also, this project does not result in any VOC emission increases from the previously established facility-wide cap, thus no offsets are required for this project. There is no change in particulate emissions from the storage silo as a result of this modification.

Georgia Pacific Corrugated LLC is a RECLAIM/Title V facility. A Title V renewal permit for this facility was issued on November 2, 2010. The proposed permit first revision is considered as a “de minimis significant permit revision” to the renewed Title V/RECLAIM permit, as described in Regulation XXX evaluation. The Title V permit is in the RECLAIM facility permit program format. This is the first revision since the renewal.

The following table summarizes the changes associated with this project:

App. No.	Device no./Equipment	Prev. Appl. No.	Action Taken
526633	D56-Flexo press	Replacing. D4 & D51	Permit to Construct
526637	RECLAIM/Title V revision	none	Approve plan
527879	D51-Flexo press	473243	Change of cond. (R1401), P/O
527880	D55-Flexo press	498531	Change of cond. (R1401), P/O
529447	D33-Storage silo	473239	Alteration (no. of filters), P/O

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**PROCESS DESCRIPTION**

Georgia-Pacific Corrugated LLC is a large sized commercial corrugated board box manufacturer. They have two corrugator laminators that produce cardboard from paper stock and starch adhesive. Corrugated board consists of a fluted sheet (called the corrugated medium) glued to one or more liners. The resulting combination of columns and arches produce a product much stronger than the paperboard from which it is made. Corrugated board is primarily used to form boxes for shipping. The manufacturing involves printing, adhesive application, wax application, cutting, etc. The boxes used in the food industry require moisture resistance. This is achieved by application of a thin wax film on the finished printed surface.

In the typical flexo printing sequence, the substrate is fed into the press from a roll. The image is printed as substrate is pulled through a series of stations, or print units. Each print unit prints a single color. Flexographic printing employs a plate cylinder, a metering cylinder known as the anilox roll that applies ink to the plate, and an ink pan. Some presses use a third roller as a fountain roller and, in some cases, a doctor blade for improved ink distribution.

Flexographic presses are commonly utilized to print images on the corrugated sheet stock. The printed sheet stock is then sent to the creaser/slotter section to be trimmed and slotted. Following trimming, the printed sheet stock is directed to the folder gluer section where it is folded, glued, assembled and subsequently prepared for shipment off-site.

The facility is using very low VOC water based flexo inks with a VOC content of about 0.25 lbs/gal or less with rare exceptions. The flexographic inks used at this facility are supplied by Advanced Color Systems, Inc. The facility also uses inks designated as HQ series inks (PMS/GCMI colors and whites). The HQ series inks have a VOC content of less than 1.5 lbs/gal less water and exempt solvents. These PMS/GCMI inks are used in special jobs requested by the customers. A permit condition for BACT shall be imposed limiting the VOC content of all inks to less than 0.5 lbs/gal with the exception of PMS/GCMI inks which will be limited to 1.5 lbs/gal. This facility has similar flexographic printing presses with the same ink VOC content permit conditions. The inks contain a small quantity of Rule 1401 compounds. The facility uses “Americlean Blue” and “Ecosafe Flexographic Ink Cleaner” to clean the flexographic printing presses. Both of these materials contain no VOCs.

**OPERATING HOURS**

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

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<b>EMISSION CALCULATIONS</b>
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**A/N 526633: New Flexo Press**

Emissions from this equipment are ROG. No particulate emissions are expected from the operation of a flexographic printing operation since there is no atomization or heating of the inks. The VOC emission sources are from hydrocarbons in the water based inks. The applicant provided MSDS for the inks. The maximum VOC content will be used for these calculations. The clean-up solvents do not contain any VOC.

The facility has submitted information concerning maximum ink usage per hour of 112 lbs provided the following assumptions are met:

- Running the machine at maximum rate
- Running the largest size sheets through the machine
- Using all 4 inks
- Greater than 100% coverage (100% surface coverage, with a high amount of ink overlap)

However, the above scenario is most unlikely as the production could not be sustained for 24 hours. If that were to happen, that would be no employee breaks, no machine down time and no change of jobs.

A more realistic maximum ink usage is about 120 gallons/day, which is 50 lbs/hr at an average ink density of 10 lbs/gal. The ink VOC content varies from 0.002 lbs/gal to 1.5 lbs/gal less water and exempt solvents; the VOC content of the material is much lower. The ink manufacturer (ACS) provided a summary table of inks, density, VOC of coating and % ammonium hydroxide.

**TOXIC EMISSIONS**

The inks contain copper compounds which are not going to be emitted through the ink application method since there is no atomization. Styrene acrylic co-polymer is also present in some of the inks, however, there is no free styrene so styrene emissions are not expected. Inks also contain ammonium hydroxide, which is a R1401 air toxic. The summary provided by the manufacturer shows the ammonium hydroxide contents to be less than 1%. However, according to the MSDS, the inks have a maximum of 3% by weight ammonium hydroxide. The higher content will be used for this toxic evaluation.

Ammonium hydroxide = NH<sub>4</sub>OH: MW = 35

Ammonia = NH<sub>3</sub>: MW = 17

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Ammonia lb/gal = 10 lb/gal x 0.03 lb NH<sub>4</sub>OH/lb x 17 NH<sub>3</sub> /35 NH<sub>4</sub>OH = 0.146 lb NH<sub>3</sub>/gal

Compounds	Content (lbs/gal) A	Max. Gallons used/day B	No. of Days In a year Possible max. C	Lbs/year A x B x C D	Lbs/hr = (A x B) / 24	Rule 1401 Tier 1 level at 100 meters
Ammonia in Inks	0.146	120	365	6,395	0.73	8.57 lbs/hr 51,700 lbs/yr

The ammonia emissions are well below the Tier 1 levels for a 100 meter receptor. Even at 112 lb/hr ink usage, the emissions would be well below the Tier 1 screening levels. No further analysis is required. Thus, this equipment is expected to comply with the Rule 1401 requirements.

**A/Ns 527879 and 527880 Flexo press; change of condition**

The copper in the ink is not airborne and so there are no copper emissions. The permit condition will be changed so that the facility can accommodate non-volatile carcinogenic compounds. There is no increase in Rule1401 emissions so this change is exempt under Rule 1401 (g)(1)(B) and the Rule tag date for both these flexo presses will be kept the same as existing tags.

There is no emission increase in any other criteria and Rule 1401 pollutant as a result of this change of condition.

**A/N 5229447: Storage Silo**

The applicant has stated that there are 9 cartridge filters in the bin vent. There is no fan pulling or pushing the particulate when the silo is being filled with corn starch. This makes the operation passive for particulate emissions as the rate at which air would flow through the bin vent is the rate at which the volume of air in silo is replaced by filling starch. The applicant has stated it takes one hour to fill the 50,000 lbs of starch. From the MSDS of starch, the density is 31-44 lbs/cubic feet. For worst case scenario, use density of 31 lbs/cu. ft. This bin vent has a reverse pulse jet cleaning system. The design check and emissions are being recalculated now since it appears the facility gave us erroneous information at the time the silo was originally permitted.

Volume of air displaced = 50,000 lb per hr ÷ 31 lbs/cu. ft = 1612 cu. ft/hr = 27 cfm

Cloth surface area of bin vent = 9 x π x (5.5/12) x 36/12 = 38.9 sq. ft

Air to cloth ratio = 27/38.9 = 0.69

For reverse pulse jet system, the recommended maximum ratio is 8:1.

This equipment complies with this requirement.

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Particulate emissions:

Maximum loading in any one day = 50,000 lbs

PM=PM<sub>10</sub>

The emission factor for controlled emissions (R2) stated in Table 11.12-2 of US EPA AP 42 is 0.00034 lbs/ ton of material for total PM<sub>10</sub>. Assume 99% control efficiency for the filter vent so R1 factor is 0.034 lbs PM/ton.

R2 = 25 tons/day x 0.00034 lb PM/ton = 0.0085 lb/day and 0.0085 lb/hr

R1 = 25 tons/day X 0.034 lbs/ton = 0.85 lb/day and 0.85 lb/hr

**RULES/REGULATION EVALUATION**

▣ **RULE 212, PUBLIC NOTIFICATION**

v **SECTION 212(c) (1):**

This section requires a public notice for all new or modified permit units that may emit air contaminants located within 1,000 feet from the outer boundary of a school. This source is not located within 1,000 feet from the outer boundary of a school. Therefore, public notice will not be required by this section.

v **SECTION 212(c) (2):**

This section requires a public notice for all new or modified facilities which have on-site emission increases exceeding any of the daily maximums as specified in subdivision (g). This project will not cause a net increase in the potential VOC emissions from this facility since the facility-wide VOC emission limit is not changing. There is no increase in PM emissions from the silo. Therefore, this project will not be subject to this section.

<b>LB/DAY</b>	<b>CO</b>	<b>NOX</b>	<b>PM<sub>10</sub></b>	<b>ROG</b>	<b>Lead</b>	<b>SOX</b>
<b>MAX. LIMIT</b>	220	40	30	30	3	60
<b>INCREASES</b>	0	0	0	0	0	0

v **SECTION 212(c) (3):**

Please, see Rule 1401 evaluation section. There are no carcinogenic Rule 1401 air toxic compounds in the materials to be used in this equipment. The HIA and HIC from ammonia emissions are well below 1. Public notice is not required by this section.

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▼ **SECTION 212(g):**

This section requires a public notice for all new or modified sources which undergo construction or modifications resulting an emissions increase exceeding any of the daily maximum specified in the table below. This is a functionally identical replacement with no increase and modification/change of condition with no emission increase. Therefore, no public notice will be required by this section.

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

AQMD database has no records of any visible emissions or nuisance complaints against this company in the last two years. There are no NOV's and NC's issued to this facility in last two years. A video of the filling of the silo was submitted by the applicant which showed no visible emissions.

**RULE 404**

Grain loading based on 0.00034 lbs/hr of particulate emissions (0.000034 lbs/hr X 7000 grains/lb ) / (60 minutes/hr X 27 ACFM)

$$\text{Grain load} = 0.0085 \text{ lb/hr} \times 7000 \text{ grains/lb} \div 27 \text{ cu ft/min} \times 60 \text{ min/hr} = 0.0367 \text{ gr/ft}^3$$

Rule requirement is 0.196 grains/ft<sup>3</sup> for < 883 cfm. This complies with the rule.

▣ **RULE 1130, GRAPHIC ARTS**

▼ **SECTION (C) (1), VOC CONTENT OF INKS**

The facility uses all water based flexographic inks with max VOC content of 1.5 lbs/gallon coating (less water and exempt compounds) which is below the rule limit for porous substrates of 225 gm/liter or 1.875 lbs/gal. Thus, compliance with the rule requirements is expected.

▣ **RULE 1155, PARTICULATE MATTER (PM) CONTROL DEVICES**

The filter vent on the silo is considered a Tier 1 baghouse (filter area is < 100 sq. ft.) and a bin vent under the definitions in this rule. Under (g)(1) since the filter area is less than 100 sq. ft., the filter is exempt from the provisions of this rule with the exception of (d)(1) requirement of no visible emissions. Under (g)(6) bin vents are also exempt from (e)(1) monitoring requirements.

▣ **RULE 1171, SOLVENT CLEANING OPERATIONS**

According to MSDS provided by the applicant, clean-up materials to be used in the proposed press and that are used in the existing presses contain no VOCs. Thus, compliance with rule requirements is expected.

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**REGULATION XIII**

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

(a) VOC EMISSIONS

For the new flexographic printing press, the ink VOC will not exceed 0.5 lbs/gal coating, less water and exempt solvents for all inks except ink designated as specialty series inks. The specialty series inks shall have VOC less than 1.5 lbs/gal coating, less water and exempt solvents. Permit conditions will be imposed to limit PMS/GCMI inks to 1.5 lb/gal coating or less and all others to 0.5 lb/gal. No VOC clean-up materials will also be used. This complies with the BACT requirement for flexographic printing. There is no emission increase from the change of conditions on the two presses and modification to the silo so BACT is not triggered for this equipment.

▣ **RULE 1303(b) (1), MODELING**

No detailed modeling analysis is required for VOC emissions only. There is no increase in emissions from the change of conditions and modification applications so modeling is not required.

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

Emission offsets are not required for this project as the applicant has not requested any VOC emission increases in the facility-wide VOC emission cap under this project. There are no increases of PM from the silo.

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

As discussed above in the evaluation report, there will be only ammonia emissions from the new press which results in HIA and HIC well below 1. For the change of condition and modification application there is no increase in emissions therefore this equipment is exempt under (g)(1)(B) – modification with no increase in risk.

**REGULATION XXX**

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

Non-RECLAIM Pollutants or HAPs

Rule 3000(b)(6) defines a “de minimis significant permit revision” as any Title V permit revision where the cumulative emission increases of non-RECLAIM pollutants or HAPs from these permit revisions during the term of the permit are not greater than any of the following emission threshold levels:

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<b>Air Contaminant</b>	<b>Daily Maximum (lbs/day)</b>
HAP	30
VOC	30
NO <sub>x</sub> *	40
PM <sub>10</sub>	30
SO <sub>x</sub> *	60
CO	220

\* Not applicable if this is a RECLAIM pollutant

To determine if a project is considered as a “de minimis significant permit revision” for non-RECLAIM pollutants or HAPs, emission increases for non-RECLAIM pollutants or HAPs resulting from all permit revisions that are made after the issuance of the Title V renewal permit shall be accumulated and compared to the above threshold levels. This proposed project is the 1<sup>st</sup> permit revision to the Title V renewal issued on November 2, 2010. The following table summarizes the cumulative emission increases resulting from all permit revisions since the Title V renewal permit was issued:

<b>Revision</b>	<b>HAP</b>	<b>VOC</b>	<b>NO<sub>x</sub>*</b>	<b>PM<sub>10</sub></b>	<b>SO<sub>x</sub></b>	<b>CO</b>
1 <sup>st</sup> Permit Revision: Add new flexographic press (A/N 526633) Device no. D56, change condition for Device no. D51(A/N 527879) and D55(A/N 527880), and modify Device no. D33 (A/N 529447)	0	0	0	0	0	0
Maximum Daily Threshold	30	30	40	30	60	220

\* RECLAIM pollutant, not subject to emission accumulation requirements

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

#### RECLAIM Pollutants

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

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Since NOx is a RECLAIM pollutant for this facility, a separate analysis shall be made to determine if the proposed permit revision is considered a “minor permit revision” for RECLAIM pollutants. However, since the proposed project is expected to result in no NOx emissions from this permit revision, this proposed project is considered as a “minor permit revision” for RECLAIM pollutants.

**RECOMMENDATION**

The proposed project is expected to comply with all applicable District Rules and Regulations. Since the proposed project is considered as a “de minimis significant permit revision” for non-RECLAIM pollutants or hazardous air pollutants (HAPs), and a “minor permit revision” for RECLAIM pollutants, it is exempt from the public participation requirements under Rule 3006(b). A proposed permit incorporating this permit revision will be submitted to EPA for a 45-day review pursuant to Rule 3003(j). If EPA does not have any objections within the review period, a revised Title V/RECLAIM permit will be issued to this facility with the new press in Section H (P/C) and the change of conditions for D51 and D55 and modification to D33 in Section D (P/Os).