South Coast Air Quality Management District

Statement of Basis

Proposed Title V Renewal Permit

Facility Name:	Vista Metals Corporation
Facility ID:	14495
SIC Code:	3341
Equipment Location:	13425 Whittram Ave. Fontana, CA 92335
Application No.:	494921
Application Submittal Date:	01/14/2009
AQMD Contact Person:	Michael Solis
Phone Number:	(909) 396-3277
E-Mail Address:	msolis@aqmd.gov

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1. Introduction and Scope of Permit

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

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

The AQMD implements Title V through Regulation XXX – Title V Permits, adopted by the AQMD Governing Board in order to comply with Environmental Protection Agency's (EPA) 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, NO_2, SO_2, 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 renewal permit is proposed to be issued to cover the operations of Vista Metals Corporation located at 13425 Whittram Avenue Fontana, CA. This facility is subject to Title V requirements because it is a major source.

2. Facility Description

This is an existing facility applying for a Title V permit renewal that is in the business of secondary aluminum smelting. This facility is operating two aluminum chip dryers, six smelting furnaces, six homogenizing furnaces, three baghouses, two afterburners, one fuel storage and gasoline dispenser, and two tanks for metal etching.

3. Construction and Permitting History

This is a renewal of the company's Title V permit, which was issued to the facility on July 19, 2004. Since the issuance of the initial Title V permit in 2004, 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. This facility is not subject to any New Source Performance Standards (NSPS) or National Emissions Standards for Hazardous Air Pollutants (NESHAPs) requirements.

5. Monitoring and Operational Requirements

Applicable monitoring and operational requirements for which the facility is required to comply are identified in the Title V permit (for example, Sections D, F, and J and Appendix B of the proposed Title V permit). Discussion of any applicable operational requirements can be found in the Engineering Evaluations. All periodic monitoring requirements were developed using strict adherence to the following applicable guidance documents: SCAQMD Periodic Monitoring Guidelines for Title V Facilities (November 1997); California Air Pollution Control Officer's Association/California Air Resources Board/Environmental Protection Agency (CAPCOA/CARB/EPA) Region IX Periodic Monitoring Recommendations for Generally Applicable Requirements in State Implementation Plan (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). This facility has bag houses to control PM10 Emissions. Since the uncontrolled PM10 emission of the baghouse does not exceed 70 tons/year, Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 do not apply to any of the permitted emission sources at this facility.

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 2009

Pollutants	Emissions (tons/year)
CO	5.778
NOX	8.893
ROG	1.389
SOX	0.102
PM	3.650

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

The Following TACs Were Reported	Emissions, lbs/yr
1, 3 Butadiene	1.194
Ammonia	1043.917
Benzene	7.148
Beryllium	.013
Cadmium	.263
Formaldehyde	8.736
Lead (inorganic)	.401
Naphthalene	2.233
PAHs, total, with components not reported	.032

Health Risk from Toxic Air Contaminants

The facility is subject to review by the Air Toxics Information and Assessment Act (AB2588). Health Risk Assessment (HRA) was approved by the AB 2588 staff in 2008. From the approved HRA, the Cancer Risk is 19.80 in a million, the Acute Hazard Index is 0.1, and the Chronic Hazard Index is 0.29.

8. Compliance History

The facility has been subject to both self-reporting requirements and AQMD inspections. The facility has had no citizen complaints filed. Three Notices to Comply have been issued in the last two years for calculation of NOx emissions, modification to increase gas usage, and the use of correction factors to convert gas meter to standard cubic feet. No Notices of Violation have been issued in the last two years. Upon follow-up inspections, the facility was found to be in compliance.

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.