

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT****ENGINEERING AND COMPLIANCE DIVISION
COATING, PRINTING, AEROSPACE & METAL FINISHING TEAM
PERMIT APPLICATION EVALUATION**

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**PERMIT TO CONSTRUCT/OPERATE - SIX new electric autoclaves
PERMIT TO OPERATE – C/C TWENTY-EIGHT other equipment**

APPLICANT:	Hitco Carbon Composites, Inc
FACILITY ID:	800066
EQUIPMENT LOCATION:	1600 W. 135 th St., Gardena, CA 90249
MAILING ADDRESS:	1600 W. 135 th St., Gardena, CA 90249

EQUIPMENT DESCRIPTION:**NEW EQUIPMENT**

<i>A/N</i>	<i>Equipment</i>	<i>Device</i>	<i>Description</i>	<i>Action</i>
535979	Autoclave	D214	Autoclave A -20, 3'-0" DIA., x 25'-0" L., Electric, 81 KW	PC/PO
535981	Autoclave	D215	Autoclave A -21, 3'-0" DIA., x 25'-0" L., Electric, 81 KW	PC/PO
535982	Autoclave	D216	Autoclave A -22, 3'-0" DIA., x 25'-0" L., Electric, 81 KW	PC/PO
535983	Autoclave	D217	Autoclave A -23, 3'-0" DIA., x 25'-0" L., Electric, 81 KW	PC/PO
535984	Autoclave	D218	Autoclave A -24, 3'-0" DIA., x 25'-0" L., Electric, 81 KW	PC/PO
535985	Autoclave	D219	Autoclave A -25, 3'-0" DIA., x 25'-0" L., Electric, 81 KW	PC/PO
535986	RECLAIM Amendment/Title V Permit Revision			Approve Plan

EQUIPMENT ADMIN. CHANGE OF CONDITION

(To include 6 new autoclaves in group VOC cap – Condition A63.3)

A/N	EQUIPMENT	DEVICE	PREVIOUS A/N (P/O)	ACTION
535987	Spray Booth	D135	421096 (F65666)	ADM. C/C-PO
535988	Autoclave	D164	394390 (F57005)	ADM. C/C-PO**
535989	Autoclave*	D165	394391 (F57006)	ADM. C/C-PO **
535990	Autoclave*	D166	394393 (F57007)	ADM. C/C-PO **
535991	Oven	D167	394396 (F57009)	ADM. C/C-PO
535992	Oven	D168	394395 (F57008)	ADM. C/C-PO



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A/N	EQUIPMENT	DEVICE	PREVIOUS A/N (P/O)	ACTION
535997	Autoclave*	D169	394397 (F57010)	ADM. C/C-PO **
535998	Autoclave*	D170	394399 (F57011)	ADM. C/C-PO **
535999	Autoclave*	D171	394400 (F57012)	ADM. C/C-PO **
536001	Oven	D172	394401 (F57013)	ADM. C/C-PO
536002	Oven	D173	394402 (F57014)	ADM. C/C-PO
536003	Autoclave	D174	394403 (F57015)	ADM. C/C-PO**
536004	Press, hydraulic	D175	394383 (F56998)	ADM. C/C-PO**
536005	Press, hydraulic	D177	394385 (F57001)	ADM. C/C-PO**
536006	Press, hydraulic	D178	394386 (F57002)	ADM. C/C-PO**
536007	Press, hydraulic	D179	394387 (F57003)	ADM. C/C-PO**
536008	Press, hydraulic	D180	394388 (F57004)	ADM. C/C-PO**
536009	Oven	D188	394380 (F57005)	ADM. C/C-PO
536011	Oven	D189	394379 (F56994)	ADM. C/C-PO
536012	Oven	D190	394381 (F56996)	ADM. C/C-PO
536013	Oven	D191	394382 (F56997)	ADM. C/C-PO
536014	Autoclave	D195	394406 (F57018)	ADM. C/C-PO **
536015	Autoclave	D203	475589 (G12115)	ADM. C/C-PO **
536016	Roller coater	D205	477024 (F99060)	ADM. C/C-PO
536017	Press, hydraulic	D206	475570 (F99056)	ADM. C/C-PO**
536018	Oven	D208	475586 (F99057)	ADM. C/C-PO
536019	Autoclave	D209	475587 (F99058)	ADM. C/C-PO**
536020	Autoclave	D210	475588 (/F99059)	ADM. C/C-PO**

* B-CATs have been corrected for this equipment to accurately reflect the equipment description

** Condition H23.5 (Rule 442 applicability) is also added to this equipment for clarity

Conditions for 6 new autoclaves

F2.2 THE OPERATOR SHALL LIMIT EMISSIONS FROM THIS FACILITY AS FOLLOWS:

CONTAMINANT	EMISSIONS LIMIT
VOC	Less than or equal to 833 LBS IN ANY CALENDAR MONTH

For the purposes of this condition, the limit shall be based on the total combined VOC emissions from all equipment and processes subject to Rule 442.

To ensure compliance with the monthly Volatile Organic Compound (VOC) emission limit(s) of this condition, the operator shall comply with the following recordkeeping requirements:



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- (1) The operator shall comply with Rule 109 (Recordkeeping for Volatile Organic Compound Emissions).
- (2) Within 14 calendar days after the end of each month, the operator shall total and record VOC emissions for the month from all equipment and operations covered by the monthly emission limit(s). The record shall include any procedures used to account for control device efficiencies and/or waste disposal. It shall be signed and certified for accuracy by the highest ranking individual responsible for compliance with District rules.
- (3) The operator shall maintain a single list which includes only the name and address of each person from whom the facility acquired VOC-containing material regulated by the District that was used or stored at the facility during the preceding 12 months.
- (4) The operator shall retain all purchase invoices for all VOC-containing material used or stored at the facility, and all waste manifests for all waste VOC-containing material removed from the facility, for five years.

[RULE 442, 12-15-2000]

A63.3 will also be changed on all admin. change of cond. applications

A63.3 THE OPERATOR SHALL LIMIT EMISSIONS FROM THIS EQUIPMENT AS FOLLOWS:

CONTAMINANT	EMISSIONS LIMIT
VOC	Less than or equal to 81 LBS IN ANY ONE DAY

For the purposes of this condition, the limit shall be based on the total combined emission from equipment operating under device numbers D135, D164, D165, D166, D167, D168, D169, D170, D171, D172, D173, D174, D175, D177, D178, D179, D180, D188, D189, D190, D191, D195, D203, D205, D206, D208, D209, D210, D214 (autoclave A20), D215 (autoclave A21), D216 (autoclave A22), D217 (autoclave A23), D218 (autoclave A24)and D219 (autoclave A25).

[RULE 1303(b) (2)-OFFSET, 5-10-1996]

A63.7 THE OPERATOR SHALL LIMIT EMISSIONS FROM THIS EQUIPMENT AS FOLLOWS:

CONTAMINANT	EMISSIONS LIMIT
VOC	Less than or equal to 900 LBS IN ANY CALENDAR MONTH

For the purposes of this condition, the limit shall be based on the total combined emission from equipment operating under device numbers D214 (autoclave A20), D215 (autoclave A21), D216 (autoclave A22), D217 (autoclave A23), D218 (autoclave A24)and D219 (autoclave A25).

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

B59.13 The operator shall not use the following materials in this device:

Materials containing any toxic air contaminants identified in Rule 1401, Table I, with an effective date of September 10, 2010 or earlier.

[RULE 1401, 9-10-2010]



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C6.23 The operator shall use this equipment in such a manner that the temperature being monitored, as indicated below, does not exceed 425 degrees F.

To comply with this condition, the operator shall install and maintain a temperature gauge to accurately indicate the temperature in the equipment.

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

[RULE 1303(a) (1)-BACT, 5-10-1996; RULE 3004(a) (4)-Periodic Monitoring, 12-12-1997; RULE 401, 3-2-1984; RULE 401, 11-9-2001]

E193.4 The operator shall construct this equipment according to the following requirements:

This permit shall expire if the construction of this equipment is not completed by *(1 year from issue date)* unless an extension of time has been approved in writing by a District representative.

The operator shall notify a District representative when construction has been completed.

[RULE 202, 5-7-1976; RULE 205, 1-5-1990]

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

Contaminant	Rule	Rule/Subpart
VOC	District Rule	442

[RULE 442, 12-15-2000]

K67.10 The operator shall keep records, in a manner approved by the District, for the following parameters or items:

In addition to the recordkeeping requirements in Rule 109, the operator shall keep adequate records for this equipment to verify the daily VOC emissions in pounds and the VOC content of each material as applied (including water and exempt compounds).

Within 14 calendar days after the end of each month, the operator shall total and record VOC emissions for the month from this equipment. The record shall include any procedures used to account for control device efficiencies and/or waste disposal. It shall be signed and certified for accuracy by the highest ranking individual responsible for compliance with District Rules.

The operator shall maintain a single list which includes only the name and address of each person from whom the facility acquired VOC-containing materials regulated by the District that were used or stored at the facility during the preceding 12 months.

The operator shall retain all purchase invoices for all VOC-containing material used or stored at the facility, and all waste manifests for all waste VOC-containing material removed from the facility.

All current Material Safety Data Sheets (MSDS) for all VOC-containing materials used at this facility and subject to District rules shall be made available to District personnel upon request.

[RULE 109, 5-2-2003; RULE 1303(b) (2)-Offset, 5-10-1996]



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BACKGROUND:

The above applications were submitted to the District on April 13, 2012 to install six new identical electric autoclaves, change permit conditions on 28 VOC emitting equipment under a group VOC cap, and a RECLAIM Amendment/Title V revision plan. The new autoclaves are designed for specific parts (height and length) to cure composite parts and will be located next to the assembly line in order to increase production while reducing costs. There are 28 devices that are currently operating under a group VOC cap of 81 lb/day. Hitco is requesting to include the six new autoclaves in this group cap so no offsets are required. The facility is also requesting a combined emission cap of 900 lbs of VOC per month from the six new autoclaves (A-20 – A-25) so public notice is not required. A facility-wide VOC emission limit has not been established for this location. The facility has submitted 2012 records for Rule 442 emissions and the emissions from 81 lb/day bubble which indicate that adding these six autoclaves will not go over these limits and compliance with the proposed VOC emission caps is expected.

Hitco Carbon Composites Inc. is a large-sized aerospace component manufacturer and has a number of active permits from the District for autoclaves, furnaces, afterburner control devices, spray booths, I.C. Engines, storage tanks, ovens, presses, boilers, process tanks, dust collector, abrasive blasting systems and baghouses. Under this master ID 800066 there are two sub-IDs #5646 and #15648.

Hitco Carbon Composites is a NOx RECLAIM and Title V facility. The Title V permit was renewed on January 20, 2008 and this is the eighth revision to the renewal. The proposed project is considered as a “de minimis significant permit revision” to the renewed Title V permit, as described in the Regulation XXX evaluation.

There are no complaints on file against this facility in the last two years. One Notice to Comply NC D28666 was issued in February 2011 to install gauges on some gas fuel meters, report quarterly NOx process unit gas usage in SCF, and conduct weekly visible emission observations of permitted baghouses and maintain records of observations. This N/C was closed on 4/15/2011. There are no other N/Cs or NOVs issued in the last two years.

Additional updates to the facility permit included with this revision as requested by facility and to clarify permit:

The following updates are made to the facility permit to accurately reflect the equipment descriptions and conditions.

1. Device D171 – autoclave - correct rating from 6650 to 1200 KW (e-mail from facility)
2. Device D213 – autoclave - add rating of 650 KW (e-mail from facility)



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3. Rule 442 condition H23.5 added to the following devices (see email dated 9/28/2012):

D111, D164, D165, D166, D169, D170, D171, D174, D175, D177, D178, D179, D180, D195, D203, D206, D209, and D210.

The facility already includes VOC emissions from these devices in their Rule 442 records. This condition is added to the other equipment subject to Rule 442 for clarity. These are autoclaves and hydraulic presses. Admin C/C applications were filed for all of the above devices except for D111 autoclave.

4. The following devices are removed /inactivated from the facility permit as they are no longer at the facility (see emails dated 9/24/2012 and 10/3/2012). The 9/24/2012 email has been forwarded to Permit Services to inactivate this permit in PAATs. For devices D28, D29 & D30, these tanks are part of a permit unit under A/N 197426 which also includes D23-D27 and D31 which have NOT been removed. Therefore this permit will not be inactivated.

REMOVED: D99, C100
(A/N 163809 under sub ID 5646 for abrasive blast cabinet & integral filter)

REMOVED: D28, D29 & D30
(A/N 197426 for hydrochloric acid leaching tanks, nos. 7, 8 & 9)

PROCESS DESCRIPTION:

Hitco Carbon Composites Inc. manufactures advanced composite materials and structures for defense, aerospace and industrial applications that require light weight, high strength and high heat resistant properties. Some of the products manufactured on site are Delta and Titan rocket motor nozzle cones, Boeing C-17 tail cones, Boeing 767 flap track fairings, Atlas V rocket nose fairings, F-22 jet engine intake lips, carbon fiber/carbon composite (carbon/carbon) brake discs (for military aircraft, GT Series and Formula 1 cars), multi-layered thermal and acoustic insulation materials (cloth, blanket, and panels) and they have recently obtained a sub-contract to manufacture high strength composite beams for the Boeing 787 aircraft.

Composite Structures Manufacturing

The components will be manufactured using prepreg (resin impregnated carbon fiber) sheets. Hitco will buy these special prepreg materials from another company. Initially prepreg materials will be layered flat and cut into different patterns on a programmable cutter. Cut prepreg pieces will be layered inside special molds, one layer on top of another, building up to the desired thickness. The prepreg pieces are generally placed in



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such a way that the fibers cross in opposite and 45 degree angular directions to obtain high strength in the final product.

The prepreg surfaces and the mold are covered in a thin rubber bag to prevent delamination. The rubber bag holds the prepregs tightly inside the mold and squeezes out any air bubbles from prepreg layers prior to curing. The parts will then be cured inside the autoclave at a temperature of about 425°F and under 165 psi pressure for 6 hours. During the curing cycle, at higher temperature, VOC emissions are emitted (about 1% of prepreg weight) from this operation.

The new autoclaves will be used to cure any aerospace composite parts where only VOC is emitted. There are no PM₁₀ emissions expected.

EMISSIONS CALCULATIONS:

This facility operates 24 hours/day, 7 days/week, 52 weeks/year. The maximum VOC emission from this project is approximately 10 lb/day from the autoclaves. The increase in emissions will be bubbled into the existing 81 pounds/day VOC emissions cap with other 28 devices so that this project will not result in any emission increase from the facility. The facility submitted MSDS for prepreg and emission factors from the manufacturer. The following calculations are based on the most current information submitted by the facility. The VOC content in the prepreg ranges from 0.24% to 1.00% by weight. All calculations are based on worst case scenario VOC of 1.00% by weight. Materials with maximum VOC of 1% are Cycom 5250-4 and Cycom 7277. Maximum VOC content of material processed in the autoclaves is 1%. Please see manufacturer's information in master file.

Emission factor = 1.0 % (maximum) VOC of prepreg weight

Each load = 40 lbs pre-preg

Cure time per load = 6 hrs in autoclave

Maximum load charged to Autoclave = 160 pounds pre-preg/day (up to 4 loads/day)

Max VOC emissions = 160 lb pre-preg x (1 lb VOC/100 lb pre-preg) = 1.6 lbs/day/autoclave

These six new autoclaves (1.6 lb/day x 6 autoclaves = 9.6 lb/day) will be operated under a group VOC cap of 81 lbs VOC per day with 28 other pieces of equipment.

NSR Max VOC R1 = R2 = 1.6 lb/day ÷ 24 hrs/day = 0.06 lb/hr

AEIS emissions 50 % of NSR

AEIS Ave VOC R1 = R2 = 0.03 lb/hr



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RULE EVALUATION:

RULE 212(c)(1) *This section requires a public notice for all new and modified permit units that may emit air contaminants located within 1,000 feet from the outer boundary of a school.*

Since there are no schools within 1,000 feet of the facility, a public notice will not be required by this section.

RULE 212(c)(2) *This section requires a public notice for all new and modified facility which have on-site emission increases exceeding any of the daily maximums specified in subdivision (g).*

There is no emission increase from the facility as a result of this project. VOC emissions from the proposed six autoclaves will be bubbled in a combined group cap of 81 pounds per day limit with 28 other devices. Public notice will not be required under this section.

RULE 212(c)(3) *This section requires a public notice for all new or modified permit units with increases in emissions of toxic air contaminants listed in Table I of Rule 1401 resulting in MICR greater than $1E^{-6}$ per permit unit or greater than $10E^{-6}$ per facility.*

There are no Rule 1401 toxic compounds emitted from the new autoclaves. There is no increase in toxic emissions from the change of condition applications. Therefore, public notice will not be required by this section.

RULE 212(g) *This section requires a public notice for all new and modified sources that have equipment emission increases exceeding any of the daily maximum as specified by Rule 212 (g).*

The emission increase from the new autoclaves does not exceed the daily maximum limits specified by this rule. The six new autoclaves will be limited by permit condition to 900 lb/mo VOC combined. The following table summarizes the emission limits and increases. There is no emission increase from the change of condition applications. Public notice will not be required under this section.



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	ROG	NO _x	PM ₁₀	SO ₂	CO	Pb
Total Emission Increases	30	0	0	0	0	0
MAX MDC Limit (lb/day)	30	40	30	60	220	3
Required Public Notice	No	No	No	No	No	No

RULE 401

Visible Emissions

Visible emissions are not expected with proper maintenance and operation of this equipment. The system shows no visible emissions complaints for this facility.

RULE 402

Nuisance

Operation of this equipment is not expected to create complaints or nuisance with proper maintenance and operation. The system shows no nuisance complaints for this facility.

RULE 442

Usage of Solvents

The processing of pre-preg in the autoclave is not subject to any Reg. XI rules, therefore is subject to this rule. This rule limits facility VOC emissions from all processes subject to this rule to 833 lb/month. In 2010 the total reported VOC was 5.31 tons which includes Rule 1124 and 1171 emissions. The facility has stated that their rule 442 emissions currently are at about 300-500 lbs per month. The highest emissions were in August of 574 lbs. The facility has stated that the proposed new autoclaves are smaller than the existing autoclaves and product specific which will make the manufacturing more efficient and will not be used anywhere near maximum capacity. The maximum VOC emissions from the new autoclaves A-20 to A-25 are expected to be 288 lbs per month. The facility is expected to comply with the 833 lbs/month cap for Rule 442 emissions. Compliance is expected.

REG XIII

Rule 1303(a), Best Available Control Technology (BACT)

This is an electric autoclave so the emissions are only the VOC from the curing of pre-preg. The VOC emissions from each autoclave is less than 2 pounds/day. The manufacturing process is set up in a way that the daily VOC emissions from prepreg curing in each autoclave theoretically cannot exceed 1.6 pounds per day in a worst case scenario process. There is no BACT achieved in practice for major sources and non major sources listed for this equipment in the BACT guidelines. However, functionally, this



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equipment is similar to a curing oven in this case. Add-on control is required for curing ovens with VOC emissions greater than 20 pounds per day. The maximum expected emissions from this process is 1.6 lb VOC/day/autoclave and <10 lb/day combined (permit condition of 900 lb/mo from six new autoclaves combined for Rule 212). No add on control is required. This complies with the BACT requirement. BACT is not triggered for the change of condition applications since the equipment will continue to operate under the same emission caps.

Rule 1303 (b) (1), Modeling

Modeling is not required for VOC. There is no increase in emission from the change of condition applications so modeling is not required.

Rule 1303 (b) (2), Offsets

VOC emissions from the proposed new autoclaves will be bubbled into an existing combined group cap of 81 pounds per day, therefore there are no emission increases from the facility as a result of this project. There is no emission increase from the 28 applications for change of condition since the group VOC emission cap is staying the same. The current record keeping for the 81 lbs/day cap indicates that compliance is expected. Offsets are not required.

RULE 1401

New Source Review for Toxics

There are no rule 1401 compounds emitted from the new autoclaves. There is no increase in toxic emissions from the change of conditions. Compliance is expected.

RULE 2005

New Source Review for RECLAIM

Hitco Carbon is a NOx RECLAIM facility. There are no NOx emissions expected from the new autoclaves since they are electric. There is no increase in NOx from any of the other C/C equipment since there are no changes other than including the six new autoclaves in the group VOC emission cap.

REGULATION XXX

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

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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:

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

* Not applicable if this is a RECLAIM pollutant

To determine if a project is considered as a “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 initial Title V permit shall be accumulated and compared to the above threshold levels. This proposed project is the 8th permit revision to the Title V permit issued to this facility on January 20, 2008. In addition to the six new autoclaves and change of condition on 28 devices, this revision also includes updating the KW rating on two existing autoclaves D171 and D213, adding condition H23.5 to existing autoclave D111, and removing devices D99, C100 (abrasive blasting cabinet & filter), D28, D29 & D30 (HCl leach tanks). The following table summarizes the cumulative emission increases resulting from all permit revisions since the initial Title V permit was issued:

Revision	HAP	VOC	NO_x*	PM₁₀	SO_x	CO
1 st Permit Revision: P/C for new autoclave (A/N 475589, Dev D203)	0	6	21*	4	0	22
2 nd Permit Revision: P/O for Press (A/N 475570, D206), Oven #7 (475586, D208), Autoclave #A14 (A/N 475587, D209), Autoclave #A17 (A/N 475588, D210) & Honeycomb Articulation Machine No. 1 (A/N 477024, D205)	0	2	0*	0	0	0
3 rd Permit Revision: P/C for RTO (A/N 492308, C211)	0	0	0	0	0	0
4 th Permit Revision: P/C to P/O for RTO (A/N 492308, C211)	0	0	0*	0	0	0



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Revision	HAP	VOC	NOx*	PM ₁₀	SOx	CO
5 th Permit Revision: Addition of a spray booth (A/N 512825, D212) and removal of a press, device D176.	0	15	0	0	0	0
6 th Permit Revision: P/C to P/O for Autoclave (A/N 475589, D203)	0	0	0	0	0	0
7 th Permit Revision: P/C-P/O for new autoclave (A/N 517348, D213) and P/O change of condition for spray booth (A/N 523055, D212)	0	0	0	0	0	0
8 th Permit Revision: P/C-P/O for six new autoclaves (D214-D219) and change of condition for 28 other devices, add Rule 442 condition to devices, add KW rating to autoclaves, and inactivate devices (see Background for details)	0	0	0	0	0	0
Cumulative Total	0	23	21*	4	0	22
Maximum Daily	30	30	40*	30	60	220

* RECLAIM pollutant, not subject to emission accumulation requirements for TV

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.

Even though NOx is a RECLAIM pollutant for this facility, there are no NOx emissions from this project and a separate analysis is not required.

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), 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 P/C-P/Os for six new autoclaves and P/Os for 28 other devices with updated condition (A63.3) and other changes described above, and removal of devices D99, C100, D28, D29 & D30 in section D of the facility permit.