

<b>SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</b>  <b>ENGINEERING AND COMPLIANCE DIVISION</b> Large Coating, Printing and Chemical Operations Team <b>APPLICATION PROCESSING AND CALCULATIONS</b>	PAGE	1 of 4
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	PROCESSED BY	BA
	REVIEWED BY	SMKE
	DATE	8/13/08

**PERMIT TO OPERATE EVALUATION  
(Modification of DRYING OVEN)**

<b>Applicant's Name</b>	<b>JBL, INC.</b>
<b>Company I.D.</b>	<b>16697</b>
<b>Mailing Address</b>	<b>8500 BALBOA AVE. NORTHRIDGE, CA 91329</b>
<b>Equipment Address</b>	<b>SAME AS ABOVE</b>

**EQUIPMENT DESCRIPTION**

**APPLICATION NO. 472738**

Title V "Minor Revision" Plan – 1<sup>st</sup> Revision

**APPLICATION NO. 472737** PO no PC (modification to A/N 227557, PO D31992)

OVEN NO. LD-2, STILES, MODEL TYPE TLF 6/80, 14' – 8" W. X 19' – 8" L. X 10' – 0" H., HOT WATER HEAT HEATED, WITH ONE 3 H.P. EXHAUST FAN AND TWO 3 H.P. RECIRCULATION FANS.

**BACKGROUND**

JBL Inc. submitted the above permit application with AQMD as class III for a permit to Operate the equipment described above. The applicant has modified the oven under PO D31992 by removing all of the UV lamps and now is using a hot water from the existing boiler to maintain a temperature of up to 120 Degrees Fahrenheit in the oven as needed. According to the applicant, the process does not require a heat but they need the hot water to maintain a certain temperature during the winter time. The oven was previously operating with six UV lamps at 150 Degrees Fahrenheit. The modification did not increase the emissions from the oven.

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**DESCRIPTION:**

JBL is an audio component manufacturer (audio speaker sound systems), it is a Title V Group "A" facility under I.D. # 16697. The renewal Title V permit was issued on 7-9-06. This is a first revision since the renewal was issued. Currently this facility operates with VOC cap of 657 lb/day which will remain unchanged. This revision will be issued after the EPA 45-day review is over.

The District database for this facility does not show any confirmed nuisance complaints from the public. District records do not indicate any violation of District rules and regulations at the facility during the past two years except for this modification (NC D14702 issued on 7/31/2007) which was resolved by submitting this application.

**EMISSION CALCULATIONS**

The modification of the oven did not cause any emission changes. There were no emissions entered for this oven in the previous application for NSR. AEIS entries were 0.01 lb/hr VOC for R1 and R2.

**RULE EVALUATION:**

**▣RULE 212, PUBLIC NOTIFICATION**

**vSECTION 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 located within 1,000 feet from the outer boundary of a school. However, the modification did not increase any emissions from the oven. Therefore, a 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 by in the table below. As shown in the following table, there are not any emission increases. Therefore, a public notice will **not** be required by this section.

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

There are no changes in emissions from the modification of the oven. Therefore, a public notice will **not** be required by this section.

**v SECTION 212(g):**

This section requires a public notice for all new or modified permit units which have emission increases exceeding any of the daily maximums as specified below. As shown in the following table, the emission increases do not exceed the daily maximum limits. Therefore, this application will **not** be subject to this section.

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LB/DAY	CO	NOX	PM <sub>10</sub>	ROG	SO <sub>x</sub>	Pb
MAX. LIMIT	220	40	30	30	60	3
INCREASES	0	0	0	0	0	0

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

Compliance with these rules is expected with the proper operation of the equipment.

▣ **RULES 404, PARTICULATE MATTER - CONCENTRATION**

The original permit was evaluated and the equipment is expected to comply with this rule.

**REGULATION XIII**

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

The modification of the equipment did not change emissions from the equipment, therefore, BACT does not apply to this equipment:

▣ **RULE 1303(b)(1), MODELING**

The modification of the equipment did not change emissions from the equipment, therefore, modeling requirement does not apply to this equipment:

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

The modification of the equipment did not change emissions from the equipment, therefore, offset requirement does not apply to this equipment.

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

This modification of the equipment did not change TAC emissions from the equipment, therefore, the rule does not apply to this equipment:

**Regulation XXX**

This facility is not in the RECLAIM program. The proposed project is considered as a “minor permit revision” to the Title V permit for this facility.

Rule 3000(b)(12)(vi) defines a “minor permit revision” as any Title V permit revision that does not result in an increase in emissions of a pollutant subject to Regulation XIII – New Source Review (non-RECLAIM pollutants) or a hazardous air pollutant (HAP).

The proposed project is not expected to result in an increase in emissions of a pollutant subject to Regulation XIII – New Source Review (non-RECLAIM pollutants) or a hazardous air pollutant (HAP), and therefore is considered as a “minor permit revision” pursuant to Rule 3000(b)(12)(A)(vi).

This proposed project is the 1<sup>st</sup> permit revision to the Title V renewal permit issued to this facility on 7/9/06. The following table summarizes the permit revisions since the Title V renewal permit was issued:

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Revision	HAP	VOC	NOx	PM <sub>10</sub>	SOx	CO
1 <sup>st</sup> Permit Revision; removal of UV lamps in the oven and use of heat from a boiler. Application No. 472737	0	0	0	0	0	0
Cumulative Total	0	0	0	0	0	0
Maximum Daily	30	30	40	30	60	220

### **RECOMMENDATION**

The proposed project is expected to comply with all applicable District Rules and Regulations. Since the proposed project is considered as a “minor permit revision”, 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 permit will be issued to this facility.