

## Title V Permit Evaluation

Site Number: A9248  
Site Name: SKC America, Inc.

Application Number: 25864  
Reviewing Engineer: MCKL

### Periodic Monitoring:

#### VOC Sources

S#	Description
1	Polymer Vessel
2	Line #1 Sub-Coater
3	Line #1 – Sub Coat Dryer (Heat Recovery – No Fuel Used)
4	Line #1 – Top Coater
5	Line #1 Top Coat Dryer (Heat Recovery – No Fuel Used)
6	Vessel Unloading Surge Tank
20	Line #3 Sub-Coater
21	Line #3 Sub-Coat Dryer
22	Top Roller Coater, Line #3
23	Top Dryer, Coating Oven, Line #3 (Heat Recovery – No Fuel Used)
30	Holding Tank, Vesicular, T-322
32	Mix Tank, Diazo, T-311
33	Holding Tank, Diazo, T-321
34	Mix Tank, Vesicular, T-312
36	Polymer Holding Kettle
53	Custom Cold Solvent Sink
56	Centrifuge Decanter
57	A/S Kettle
58	Chemical Transporter (contained)
60	Vesicular side feed tank T-332
61	Spare Vesic mix Live #3 T-333
70	Mixing Kettle T-100, 225 Gallon Capacity
71	Hold Tank, T-200, 225 Gallon Capacity

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S#	Description
72	Feed Tank, Mezzanine Level, 225 Gallon Capacity
73	Submix Tank, Line #1, 225 Gallon Capacity
74	Sub Mix Tank, Line # 3, 225 Gallon Capacity
77	Flexographic Striper for 105mm Duplicate Microfilm
78	Flexographic Striper for 105mm Duplicate Microfilm
79	Flexographic Striper for 105mm Duplicate Microfilm
80	59" Flexographic Striper for Microfilm
81	Custom Cold Solvent Sink - Striping Operation
82	Pilot Line Roller Coater/Electric Dryer
100	Facility Wipe Cleaning Permit
200	Joor 10,000 Gallon Storage Tank
201	Joor 10,000 Gallon Storage Tank
202	Joor 10,000 Gallon Storage Tank
203	Joor 10,000 Gallon Storage Tank
204	Joor 10,000 Gallon Storage Tank

Adequate recordkeeping requirements are in place for the coating and solvent cleaning sources at the facility to monitor the VOC emissions from these sources, per requirements by the Regulation 8-12-501, 8-35-501, and per existing permit conditions. However, to demonstrate compliance with the destruction efficiencies for the abatement devices, additional monitoring requirements were developed for the two abatement devices (A24 and A25): [see underlines for additions; while strikethroughs indicate deletions]

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The following conditions will be amended to include references to S3, S5, S21, and S23, which are also abated by A-25, and to add monitoring requirements: [underlined text indicate additions]

CONDITION # 1132

FOR S2, LINE # 1 SUB-COATER

S3, LINE # 1 SUB-COAT DRYER

S4, LINE # 1 – TOP COATER

S5, LINE # 1 TOP COAT DRYER

S20, LINE # 3 SUB-COATER

S21, LINE # 3 SUB-COAT DRYER

S22, TOP ROLLER COATER, LINE # 3

S23, TOP DRYER, COATING OVEN, LINE #

S56, CENTRIFUGE DECANTER, AND

S82, PILOT LINE ROLLER COATER/ELECTRIC DRYER:

1. S3, S5, S21, S23, S56 and S82 shall not be used unless emissions of Precursor Organic Compounds are vented to Reeco Thermal ~~Incinerator~~ Oxidizer, A25, which is in full operation and achieving a ~~control~~ destruction efficiency of at least 95%, by ~~volume~~ weight, for Precursor Organic Compounds. (basis: BACT; Cumulative Increase)
2. SKC shall not process more than 250,000 gallons of coating per calendar year through S56 and S82 combined. (basis: Cumulative Increase)
3. SKC shall keep a District approved log of the coating processed at S56 and S82. These records shall be retained for a period of ~~two~~ five years and be made available at all times for review by the BAAQMD staff. (basis: BACT; Cumulative Increase)
4. In order to demonstrate adequate VOC capture at the S3, S5, S21, S23, S56 and S82, within three (3) months of issuance of the Title V permit, a magnahelic gauge or other approved device shall be installed and maintained downstream of each affected

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exhaust duct to indicate negative pressure at the duct. A minimum vacuum pressure of 0.2 inches of water column (as indicated by the monitoring devices) shall be maintained throughout the system. The pressure drop shall be recorded on a daily basis. This pressure drop log shall be made available for District inspection upon request and shall be retained for a period of five years. (basis: Regulation 2-1-403)

5. The minimum temperature of A25 shall be at least 1400 degrees Fahrenheit (F) whenever S-3, S-5, S-21, S-23, S56 and S82 are in operation. This minimum temperature may be adjusted by the District if source test data demonstrate that an alternate temperature is necessary for or capable of maintaining compliance with part 1 above. (basis: Regulation 2-1-403)
6. The A25 Reeco Thermal Oxidizer shall be equipped with a temperature-measuring device capable of continuously measuring and recording the temperature in A25 Reeco Thermal Oxidizer. This device shall be accurate to within 5 degrees F and shall be maintained in accordance with manufacturer's recommendations. This temperature monitor shall be used to determine compliance with the temperature requirements in part 5. In addition, the temperature log of A25 shall be made available for District inspection upon request and shall be retained for a period of 5 years from the date of each record. (basis: Regulation 1-521)
7. In order to demonstrate compliance with part 1 above, the permit holder shall perform a District approved source test annually, in accordance with the District's Manual of Procedures. The permit holder shall notify the Manager of the District's Source Test Section at least seven (7) days prior to the test, to provide the District staff the option of observing the testing. Within 45 days of test completion, a comprehensive report of the test results shall be submitted to the Manager of the District's Source Test Section for review and disposition. (basis: Regulation 2-1-403)
8. The facility may conduct a source test for the purpose of lowering the minimum temperature requirement provided that the following has occurred:
  - a. The facility has applied to the Permit Services Division for a change of conditions.
  - b. The Source Test Section was notified at least seven days prior to testing and the test protocol was deemed acceptable.
  - c. The results of the test demonstrate that A25 Reeco Thermal Oxidizer is capable of meeting the emission factor limits imposed in part 1 for Precursor Organic Compounds at the lower operating temperature.
  - d. The temperature limit shall be changed in this permit as an administrative permit amendment. (basis: Regulation 2-1-403)

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9. The minimum temperature requirement of part 5 shall not apply during an “Allowable Temperature Excursion” below the minimum temperature, provided that the controller set temperature is at or above the minimum temperature requirement. An Allowable Temperature Excursion is one of the following:

- a. A temperature excursion not exceeding 20 degrees F; or
- b. A temperature excursion for a period or periods aggregating less than or equal to 15 minutes in any hour; or
- c. A temperature excursion for a period or periods aggregating more than 15 minutes in any hour, provided that both of the following criteria are met. Only twelve such excursions are allowed per calendar year.
  - i. the excursion does not exceed 50 degrees F; and
  - ii. the duration of the excursion does not exceed 24 hours.

Two or more excursions greater than 15 minutes in duration occurring during the same 24-hour period shall be counted as one excursion toward the 12-excursion limit. (basis: Regulation 2-1-403)

10. For each Allowable Temperature Excursion that exceeds 20 degrees F and 15 minutes in duration, the Permit Holder shall keep sufficient records to demonstrate that they meet the qualifying criteria described above. Records shall be retained for a minimum of five years from the date of entry, and shall be made available to the District upon request. Records shall include at least the following information:

- a. Thermal oxidizer controller set temperature;
- b. Starting date and time, and duration of each Allowable Temperature Excursion;
- c. Minimum temperature during each Allowable Temperature Excursion;
- d. Number of Allowable Temperature Excursions per month, and total number for the current calendar year; and
- e. All strip charts or other temperature records.

(basis: Regulation 2-1-403)

11. The temperature log of A25 shall be made available for District inspection upon request and shall be retained for a period of 5 years from the date of each record. (basis: Regulation 8-12-501.3)

CONDITION # 15371

FOR S70, MIXING KETTLE T-100, 225 GALLON CAPACITY

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S71, HOLD TANK, T-200, 225 GALLON CAPACITY,  
S72, FEED TANK, MEZZANINE LEVEL, 225 GALLON CAPACITY, AND  
S100, FACILITY WIPE CLEANING PERMIT:

1. The total combined throughput of product manufactured at S70, S71, and S72, mixing kettles, shall not exceed 170,010 gallons during any consecutive twelve month period. (basis: cumulative increase)
2. The total clean-up solvent used at S70, S71, S72 mixing kettles and S100 wipe cleaning shall not exceed 3,500 gallons during any consecutive twelve month period. (basis: Cumulative Increase)
3. In order to demonstrate compliance with the above ~~condition parts~~, the following records shall be maintained in a District-approved log. These records shall be kept on site and made available for inspection for a period of at least ~~24 months~~ five years from the date on which a record is made.
  - a. The type and amount of product produced at S70, S71, and S72, in gallons per month.
  - b. The type and amount of clean-up solvent used at S70, S71, S72 and S100, in gallons per month.
  - c. The monthly quantities shall be totaled on a ~~quarterly~~ consecutive twelve month basis.  
(basis: ~~record keeping~~ Cumulative Increase)

CONDITION # 7612

FOR S73, MIXING KETTLE T-100, 225 GALLON CAPACITY, AND  
S74, SUB MIX TANK, LINE # 3, 225 GALLON CAPACITY

1. The total combined throughput of product manufactured at S73 and S74 shall not exceed 111,000 gallons

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during any consecutive twelve month period.

(basis: Cumulative Increase)

2. In order to demonstrate compliance with the above ~~condition part~~, the following records shall be maintained in a District-approved log. These records shall be kept on site and made available for inspection for a period of ~~24 months~~ five years from the date on which a record is made. (basis: Cumulative Increase)
  - a. The type and amount of product produced at S73 and S74 in gallons per month.
  - b. The monthly quantities shall be totaled on a ~~quarterly~~ consecutive twelve month basis.

### CONDITION # 12974

FOR S77, FLEXOGRAPHIC STRIPER FOR 105MM DUPLICATE MICROFILM

S78, Flexographic STRIPER FOR 105MM DUPLICATE MICROFILM

S79, FLEXOGRAPHIC STRIPER FOR 105MM DUPLICATE MICROFILM, AND

S80, 59" FLEXOGRAPHIC STRIPER FOR MICROFILM

S81, CUSTOM COLD SOLVENT SINK – STRIPING OPERATION

1. During all periods of operation, organic compound emissions from S77, S78, S79, and S80, shall be vented to A24, Thermal Oxidizer.  
(basis: BACT; Cumulative Increase)
2. The precursor organic compound destruction efficiency of A24, Thermal Oxidizer, shall be maintained at a minimum of 98.5% by weight and the overall capture/destruction efficiency of A24 shall be maintained at a minimum of 75% by weight overall.  
(basis: BACT; Cumulative Increase)
3. A24 Thermal Oxidizer, shall be properly maintained and kept in good operating condition at all times. In no event shall the minimum operating temperature of the

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Thermal Oxidizer be less than 1450 degrees F,  
whenever S77, S78, S79, or S80 is in operation.  
(basis: Regulation 2-1-403)

4. In order to determine compliance with ~~Condition~~ part 3, A 24, Thermal Oxidizer, shall be equipped with continuous temperature measuring instrumentation consisting of at least 1 thermocouple temperature probe in the thermal oxidizer. The temperature log of A24 shall be made available to the District upon request and kept for a period of five years.  
(basis: Regulation 1-521)
5. The total amount of inks, including make-up solvent, applied at sources S77, S78, S79, and S80 shall not exceed 6,510 gallons during any consecutive twelve month period. (basis: Cumulative Increase)
6. The net usage of clean-up solvents used at sources S 77, S78, S79, and S80 shall not exceed 682 gallons during any consecutive twelve month period.  
(basis: Cumulative Increase)
7. The net usage of clean-up solvents used at source S81 shall not exceed 200 gallons during any consecutive twelve month period.  
(basis: Cumulative Increase)
8. The operator of this source shall maintain the following records for each day of operation of the source in a District approved log: (basis: Cumulative Increase)
  - a. the dates of operation
  - b. each emission test or analysis result logged in for the day of operation they were taken.
  - c. the type, VOC content, and amount of material used daily (separate totals for each material or group of materials consistent with previous ~~condition~~ parts).
  - d. the daily quantities shall be totaled on a

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monthly and consecutive twelve month basis.

These records shall be retained for at least ~~two~~ five years from the date of entry and shall be made available for District inspection upon request.

9. In order to demonstrate adequate VOC capture at the S77, S78, S79 and S80, within three (3) months of issuance of the Title V permit, a magnahelic gauge or other approved device shall be installed and maintained downstream of each affected exhaust duct to indicate negative pressure at the duct. A minimum vacuum pressure of 0.2 inches of water column (as indicated by the monitoring devices) shall be maintained throughout the system. The pressure drop shall be recorded on a daily basis. This pressure drop log shall be made available for District inspection upon request and shall be retained for a period of five years. (basis: Regulation 2-1-403)
10. In order to demonstrate compliance with part 2 above, the permit holder shall perform a District approved source test annually, in accordance with the District's Manual of Procedures. The permit holder shall notify the Manager of the District's Source Test Section at least seven (7) days prior to the test, to provide the District staff the option of observing the testing. Within 45 days of test completion, a comprehensive report of the test results shall be submitted to the Manager of the District's Source Test Section for review and disposition. (basis: Regulation 2-1-403)
11. The facility may conduct a source test for the purpose of lowering the minimum temperature requirement provided that the following has occurred:
  - a. The facility has applied to the Permit Services Division for a change of conditions.
  - b. The Source Test Section was notified at least seven days prior to testing and the test protocol was deemed acceptable.
  - c. The results of the test demonstrate that A24 Thermal Oxidizer is capable of meeting the emission factor limits imposed in part 2 for Precursor Organic Compounds at the lower operating temperature.
  - d. The temperature limit shall be changed in this permit as an administrative permit amendment. (basis: Regulation 2-1-403)
12. The minimum temperature requirement of part 3 shall not apply during an "Allowable Temperature Excursion" below the minimum temperature, provided that the controller set temperature is at or above the minimum temperature requirement. An Allowable Temperature Excursion is one of the following:
  - a. A temperature excursion not exceeding 20 degrees F; or

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- b. A temperature excursion for a period or periods aggregating less than or equal to 15 minutes in any hour; or
- c. A temperature excursion for a period or periods aggregating more than 15 minutes in any hour, provided that both of the following criteria are met. Only twelve such excursions are allowed per calendar year.
  - i. the excursion does not exceed 50 degrees F; and
  - ii. the duration of the excursion does not exceed 24 hours.

Two or more excursions greater than 15 minutes in duration occurring during the same 24-hour period shall be counted as one excursion toward the 12-excursion limit. (basis: Regulation 2-1-403)

13. For each Allowable Temperature Excursion that exceeds 20 degrees F and 15 minutes in duration, the Permit Holder shall keep sufficient records to demonstrate that they meet the qualifying criteria described above. Records shall be retained for a minimum of five years from the date of entry, and shall be made available to the District upon request. Records shall include at least the following information:

- a. Thermal oxidizer controller set temperature;
  - b. Starting date and time, and duration of each Allowable Temperature Excursion;
  - c. Minimum temperature during each Allowable Temperature Excursion;
  - d. Number of Allowable Temperature Excursions per month, and total number for the current calendar year; and
  - e. All strip charts or other temperature records.
- (basis: Regulation 2-1-403)

14. The temperature log of A24 shall be made available for District inspection upon request and shall be retained for a period of 5 years from the date of each record. (basis: Regulation 8-12-501.3)

CONDITION # 15247

FOR S200, JOOR 10,000 GALLON STORAGE TANK

S201, JOOR 10,000 GALLON STORAGE TANK

S202, JOOR 10,000 GALLON STORAGE TANK

S203, JOOR 10,000 GALLON STORAGE TANK, AND

S204, JOOR 10,000 GALLON STORAGE TANK

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1. Only the following materials shall be stored in S200, S201, S202, S203, and S204: Acetone, MEK, Propylene Glycol Methyl Ether, Ethanol, MIBK, Methanol MeOH, Isopropyl Alcohol. (basis: Cumulative Increase)
2. The combined throughput of sources S200, S201, S202, S203, and S204 shall not exceed 1,000,000 gallons in any consecutive 12 month period. (basis: Cumulative Increase)
3. Owner/operator shall record, in a District-approved log, the throughput of each of the sources S200, S201, S202, S203, and S204, summarized on a monthly basis. This log shall remain on site for at least 2 5 years from the date the record was made. Monthly records shall be totaled on a consecutive twelve month basis. (basis: Cumulative Increase)

The following conditions will be added to S1 Polymer Vessel to ensure that emissions are negligible (< 10 lb/day):

### CONDITION # 17003

FOR S1, POLYMER VESSEL

1. There shall be no venting of the Polymer Vessel (S-1) directly to atmosphere during normal operating conditions.
2. The Polymer Vessel (S-1) shall be inspected weekly for damaged or missing seals or gaskets. Any damaged or missing seals or gaskets shall be replaced within 48 hours of discovery. The results of such weekly inspections and any repair or replacement action shall be recorded in a District-approved log and made available for District inspection. This inspection log shall remain on site for at least 5 years from the date the record was made.

### Permit Shield:

Although a permit shield was originally requested for the boilers at the facility, the facility has since reconsidered their request. No permit shield is requested.

### Compliance Status:

Although S-100 Wipe Cleaning Operation was operating without a permit at the time of Title V application submittal, a Permit to Operate S-100 was issued to the facility. There are currently no sources out of compliance.

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**Alignment of Information in Application and Proposed Permit:**

The following new sources were added to the Title V permit, since the original application was received on October 1995:

81	Stripping Operation
82	Pilot Line Roller Coater/Electric Dryer
200	Joor 10,000 Gallon Storage Tank
201	Joor 10,000 Gallon Storage Tank
202	Joor 10,000 Gallon Storage Tank
203	Joor 10,000 Gallon Storage Tank
204	Joor 10,000 Gallon Storage Tank