



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

September 14, 2005

David Schwien  
Senior Manager  
South Coast Air Quality Management District  
21865 East Copley Drive  
Diamond Bar, CA 91765

**Re: Proposed Title V Renewal Permit for Schlosser Forge Company (Facility ID #15504)**

Dear Mr. Schwien,

Thank you for the opportunity to review the proposed Title V renewal permit for the Schlosser Forge Company, located at 11711 Arrow Route in Rancho Cucamonga, CA. In accordance with South Coast AQMD regulations and 40 CFR § 70.8(c), EPA has 45 days from receipt of the proposed permit and all necessary supporting documentation to object in writing to its issuance. The Agency's 45-day review period for this project will expire on September 22, 2005. Despite this fact, as requested, EPA performed an expedited review of the proposed permit and wishes to submit the enclosed comments.

Please note that although we are completing our review early, the 60 day period for the public to petition the Administrator to object to the permit begins on September 23, 2005, the day after EPA's 45 day review period would otherwise end. Since these petitions are generally based on comments raised during the public comment period, it is important to maintain a record of the commenters and issues raised during this process. These records must be made available to the public. Also note that if the permit is later found to require corrective actions (including, but not limited to, reopening the permit for cause), the expiration of both EPA's review period and the public petition period without EPA objection does not compromise the agency's authority to take such actions.

If you have any questions, please do not hesitate to contact me at 415-972-3974 or Joe Lapka of my staff at 415-947-4226. Thank you for your time and attention to this matter.

Sincerely,

*Original signed by Laura Yannayon for*

Gerardo C. Rios  
Chief, Permits Office  
Air Division

Enclosure

## **EPA Comments on Proposed Title V Permit for Schlosser Forge Company**

1. For facilities that are not in compliance with all applicable regulatory requirements at the time of permit issuance or permit renewal, District Rule 3004(a)(10)(C) states that the permit shall contain “a requirement to comply with all requirements of an alternative operating condition, variance or order for abatement issued by the District Hearing Board. The permit shall include a compliance schedule of remedial measures, including an enforceable sequence of actions with milestones, to be taken by the owner or operator to achieve compliance.”

The statement of basis and the title V permit summary sheet indicate that the facility has received one Notice to Comply and two Notices of Violation (NOVs) in the last two calendar years. While the summary sheet indicates that all issues concerning these notices have been resolved, neither the summary nor the statement of basis explains in detail how the violations were resolved. The statement of basis should document how the NOVs were resolved and why a compliance schedule is not necessary.

2. Page 2 of the statement of basis only generally states that the CAM requirements of 40 CFR Part 64 do not apply to any of the permitted emission sources at this facility. The District must provide an explanation of this determination for each emission source.
3. Conditions D322.1, D323.1, D323.2, and D381.1 contain requirements that were imposed pursuant to the District’s periodic monitoring authority under Rule 3004(a)(4). Often when the District uses this authority under Part 70 to require monitoring, the only regulatory citation provided in the “tag” for the condition is a citation to Rule 3004(a)(4). While this tag technically satisfies the Part 70 requirement to state the regulatory basis for each condition, it is sometimes difficult to tell with which emission limits or standards the monitoring is intended to assure compliance. For each of these conditions, EPA suggests that the District also include a citation to the rule or regulation that contains the underlying emission limit or operational standard.
4. Condition H23.1 indicates that several pieces of equipment are subject to Rule 1176. However, the 500 ppm VOC limit is not contained in the permit. At a minimum, the District must add this limit to the “Emissions And Requirements” column of the equipment list on pages 19 through 20 of the permit for all devices to which the limit applies.
5. Rule 1176(e)(2)(A) requires that all sumps and wastewater separators be provided with (i) a floating cover equipped with seals; (ii) a fixed cover, equipped with a closed vent system vented to an APC device as specified in paragraph (e)(6); or (iii) an approved alternative. It is not clear from the permit which method of compliance the Permittee has selected. The District should clarify how the Permittee is complying with this rule provision. The District could do this by including more detailed conditions in the permit or by providing a more detailed description of the equipment on pages 19 through 20 of the permit. For example, if the Permittee has equipped device D41 with a floating cover pursuant to Rule 1176(e)(2)(A)(i), the equipment list could be updated to read: Sump, 600 GALLON, equipped with a floating cover.

6. Rule 1176 contains requirements for various drain system components such as process drains, junction boxes, and sewer lines. Because these are regulated emission sources, they should be identified in the permit. At a minimum, the District must generally group the facility's drain system components as a single entry in the equipment list and provide a general description of the components in the statement of basis. As an alternative to describing the components in the statement of basis, the District could reference the information submitted by the Permittee pursuant to Rule 1176(d)(1). All information incorporated into the statement of basis by reference must be readily available to the public.