

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING AND COMPLIANCE DIVISION Large Coating, Printing Aerospace and Chemical Operations Team APPLICATION PROCESSING AND CALCULATIONS	PAGE	1 of 11
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	DATE	06/27/09

**PERMIT TO CONSTRUCT EVALUATION
BOILER. SURFACE PREPARATION TANK AND SCRUBBER**

Applicant's Name	HONEYWELL INTERNATIONAL
Company I.D.	800003
Mailing Address	2525 W. 190 TH STREET, TORRANCE, CA 90504
Equipment Address	SAME AS ABOVE

EQUIPMENT DESCRIPTION

APPLICATION NO. 498863

TITLE V/RECLAIM PERMIT REVISION

APPLICATION NO. 498864 (NEW CONSTRUCTION) (D217)

BOILER, CLAYTON INDUSTRIES, MODEL NO. SF-125-FMB, WATER-TUBE TYPE FOR STEAM, 6' – 0.5" L. X' 6' – 4" W. X 7' – 7.5" H., 5.2 MM BTU PER HOUR MAXIMUM HEAT INPUT RATE, NATURAL GAS FIRED, WITH A LOW NOX BURNER, CLAYTON INDUSTRIES, MODEL NO. UH-32291.

APPLICATION NO. 498865 (NEW CONSTRUCTION) (D215, D216)

ALUMINUM SURFACE PREPARATION LINE CONSISTING OF:

1. TANK NO. 4, ALUMINUM CLEAN TANK, 4' – 4" L. X 3' – 0" W. X 3' – 6" H. NITRIC ACID, UNHEATED, NOT SPARGED.
2. TANK NO. 6, ALUMINUM SEAL TANK, 4' – 4" L. X 3' – 0" W. X 3' – 6" H., PHOSPHORIC ACID, UNHEATED, NOT SPARGED.
3. ASSOCIATED RINSE AND DRAG-OUT TANKS.

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APPLICATION NO. 498866 (Modification, P/N D86394, A/N 297542) (C155)

MODIFICATION OF SCRUBBER PREVIOUSLY PERMITTED UNDER A/N 297542, BY ADDITIONAL VENTING OF A NITRIC ACID TANK WITH FOLLOWING EQUIPMENT DESCRIPTION:

AIR POLLUTION CONTROL SYSTEM CONSISTING OF:

1. SCRUBBER, HORIZONTAL PACKED BED, AIRCHEM SYSTEM, MODEL NO. FH-66, 6' - 0" L. X 6' - 0" W. X 10' - 10" H., WITH A 2' DEEP SECTION OF 3.5" DIA. LANPAC PACKING MATERIAL, A 325 GALLON RECIRCULATION TANK, WITH A 150 GPM RECIRCULATION RATE AND A 7.5 H.P. RECIRCULATION PUMP.
2. EXHAUST SYSTEM WITH A 40 HP BLOWER VENTING THE FOLLOWING EQUIPMENT:
 - A. ACID TANK TK-12 WITH NITRIC ACID, SULFURIC ACID AND FERRIC ACID (D162)
 - B. ACID TANK TK-13 WITH NITRIC ACID, SULFURIC ACID AND FERRIC ACID (D163)
 - C. PASSIVATION TANK TK-16 WITH ALODINE (D164)
 - D. ACID TANK TK-23 WITH NITRIC ACID AND AMMONIM BIFLUORIDE (D166)
 - E. ACID TANK TK-24 WITH NITRIC ACID AND AMMONIM BIFLUORIDE (D167)
 - F. ACID TANK TK-27 WITH NITRIC ACID (D168)
 - G. ACID TANK NO.4 WITH NITRIC ACID (D215)

HISTORY

Honeywell International submitted the above applications to construct a new boiler and a new cleaning/surface preparation line at their Torrance facility. The boiler is being installed to provide steam for the test cells for aircraft parts. The surface preparation line will have nitric acid and phosphoric acid tanks for cleaning aluminum metal parts. The company already operates a similar surface preparation line at this facility under A/N 179536 (D27, D29). The new surface preparation line will eventually replace the old line operating under A/N 179536 after the complete installation and testing of the new line.

The nitric acid containing tank of the new cleaning line will be vented an existing scrubber unit operating under A/N 297542 (C155). The particulate emissions from the current nitric acid tank under A/N 179536 are not controlled. Thus, with the final replacement of the process line, there will be an overall reduction in the particulate emissions. The applicant has submitted A/N 498866 for modification of the existing scrubber device to vent an additional nitric acid tank. There is an open application (# 497477) pending on the scrubber for some administrative changes (to correct the H.P. of the exhaust fan, to allow different parameters during the maintenance operation). These changes will be incorporated under the new A/N 498866 and A/N 497477 will be cancelled.

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Honeywell International fabricates aerospace components (stainless steel, aluminum and titanium). It has a number of active permits from AQMD to operate plasma arc cutters, spray booths, coating dip-tanks, surface preparation lines, jet engine test cells, dust collectors, I.C. Engines, scrubbers, ovens, heaters, boilers, afterburners, etc. under District I.D. # 800003. The applicant has used similar equipment for a number of years without any public nuisance complaints at this location.

Honeywell International is a NOx RECLAIM/Title V facility. Per manufacturer's technical data sheet, the boiler will comply with the current District BACT requirements for NOx, and CO. The nitric acid tank of the new surface preparation line will be vented to an existing scrubber unit which will comply with the current District BACT requirements for PM10. The applicant has decided to take a natural gas usage limit of 1,182,857 cubic feet/month for the boiler. The applicant possesses enough NOx RECLAIM RTCs for the boiler. The CO, PM10 and ROG emissions from the boiler will be <0.5 lb/day and thus, offsets are not required for the boiler. Also, the combined PM10 emissions from the new boiler and new surface treatment line are expected to be <0.5 lb/day. Additionally, there will not be any VOC emission increases under this project, as there will not be any VOC containing materials in the surface preparation tanks. Thus, offsets are not required for this project.

The District database shows that the applicant has not received any odor nuisance or visible emission complaints from the public. The applicant did not receive any notice of violations from the district compliance staff in last two years. A notice to comply was issued to this facility recently to provide emission data and to apply for permits. It is still not followed up by the compliance staff.

This facility is located in an industrial area and no schools are located within 1000 feet from the property-line. Also, emissions of the criteria pollutants from this project are expected to be below the threshold limits. Thus, Rule 212 public notice is not required for this project.

A Title V renewal permit for this facility was issued on September 22, 2004. 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.

PROCESS DESCRIPTION

A conveyORIZED aluminum surface cleaning line will have one nitric acid cleaning tank, one phosphoric acid cleaning tank and water rinse tanks. None of these tanks are heated or air sparged. Aluminum parts used in the aircraft engine are heat treated in the salt bath. This process creates a film of salt on the surface of the parts. These parts will be cleaned in the nitric acid tank to remove the salt depositions. I visited this facility to observe this operation in the existing nitric acid cleaning tank. I did not see any visible NOx (brown fumes) emissions during the dip operation, as well as when the parts were removed from the tank.

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The heat treatment salt bath sometimes collects moisture which is detrimental to the aerospace parts. A metal plate with hygroscopic property is inserted in the salt bath which removes this moisture. These plates are cleaned in the phosphoric acid tank.

The nitric acid tank will be vented to a scrubber. The scrubber is a counter flow type. It is a packed bed type with bed depth of 24 inches and 39 sq. ft. surface area. Particulate emissions will be controlled in the scrubber unit. The contaminated air from the tanks will be directed to the scrubber by the action of the exhaust system blowers. The fumes and contaminated air will be blown through a packed column in the scrubber. Countercurrent to the airflow is a flow of atomized sodium hydroxide solution. The solution will be maintained at a pH of 7.5 or more by an automated pH control device. The recirculation rate will be at least 150 gallons per minutes. The packed scrubber will remove PM, PM10, and HNO3 emissions from the contaminated air.

The boiler will emit combustion pollutants such as NOx, CO, PM10, SOx, ROG and hazardous air pollutants. The boiler will be equipped with a Clayton low NOx burner, which utilizes a patented technology to emit less than 9 ppm of NOx at 3% O₂. The heat from the combustion products, which flows outside the water containing tubes, is transferred to water inside of the tubes. The fuel in this boiler is burned inside the combustion chamber, creating a hot gas which heats up the water in steam generating tubes. The boiler is supplied by the manufacturer as a packaged unit. The manufacturer assured the compliance with 1146 and the current BACT requirements. Manufacturer data sheet indicates that the boiler will not emit more than 9 ppmv NOx emissions and 50 ppmv CO emissions at 3% O₂.

OPERATING HOURS

Average: 24 hrs/day, 7 days/week, 52 weeks/year
Maximum: 24 hrs/day, 7 days/week, 52 weeks/year

EMISSION CALCULATIONS

Application No. 498864 (Boiler) (D217)

The boiler will emit combustion pollutants such as NOx, CO, PM10, SOx, ROG and hazardous air pollutants. The boiler will be equipped with a Clayton low NOx burner, which utilizes a patented technology to emit less than 9 ppm of NOx at 3% O₂. and 50 ppmv CO emissions at 3% O₂.

The applicant has decided to take a natural gas usage limit of 1,182,857 cu. ft. per month for the boiler. That is equivalent to 1.725 mmBtu/HR heat input @1050 Btu/ft³. 1,725,000 Btu/hr X ft³/1050 = 1642.86 ft³/hr X24 X30 = 1,182,857 ft³/month. The combustion emissions at 1.725 mmBTU/HR will be as follows for this new boiler.

A/N 498864

Clayton Industries Boiler

@

	<u>maximum</u>	<u>normal</u>		
<u>hr/dy</u>	24	24	<u>max heat input</u>	1.73E+06 (BTU/hr)
<u>dy/wk</u>	7	7	<u>gross heating value</u>	1050 (BTU/scf)
<u>wk/yr</u>	52	52		
<u>load</u>	100%	100%		

	<u>Emission</u>	<u>MAX</u>	<u>AVE</u>	<u>MAX</u>	<u>30-DAY</u>	<u>MAX</u>	<u>MAX</u>
	<u>Factors</u>	(lb/hr)	(lb/hr)	(lb/dy)	(lb/dy)	(lb/yr)	(ton/yr)
SO ₂ (R1)	0.6	0.001	0.001	0.024	NA	9	0.004
SO ₂ (R2)	0.6	0.001	0.001	0.024	0.024	9	0.004
NO ₂ (R1)	100	0.164	0.164	3.943	NA	1,435	0.718
NO ₂ (R2)	11.685	0.019	0.019	0.461	0.461	168	0.084
CO (R1)	39.515	0.065	0.065	1.558	NA	567	0.284
CO (R2)	39.515	0.065	0.065	1.558	1.558	567	0.284
N ₂ O (R1)	2.2	0.004	0.004	0.087	NA	32	0.016
N ₂ O (R2)	0.64	0.001	0.001	0.025	0.025	9	0.005
PM, PM ₁₀ (R1=R2)	7.6	0.012	0.012	0.300	0.300	109	0.055
CO ₂ (R1=R2)	0.000012	0.000	0.000	0.000	0.000	0	0.000
TOC(R1=R2)	5.5	0.009	0.009	0.217	0.217	79	0.039
ethyle benzene	0.0095	1.6E-05	1.6E-05	3.7E-04	NA	1.36E-1	6.82E-5
acetaldehyde	0.0043	7.1E-06	7.1E-06	1.7E-04	NA	6.17E-2	3.09E-5
acrolein	0.0027	4.4E-06	4.4E-06	1.1E-04	NA	3.88E-2	1.94E-5
benzene	0.008	1.3E-05	1.3E-05	3.2E-04	NA	1.15E-1	5.74E-5
formaldehyde	0.017	2.8E-05	2.8E-05	6.7E-04	NA	2.44E-1	1.22E-4
naphthalene	0.0003	4.9E-07	4.9E-07	1.2E-05	NA	4.31E-3	2.15E-6
PAH's	0.0001	1.6E-07	1.6E-07	3.9E-06	NA	1.44E-3	7.18E-7
toluene	0.0366	6.0E-05	6.0E-05	1.4E-03	NA	5.25E-1	2.63E-4
xylenes	0.0272	4.5E-05	4.5E-05	1.1E-03	NA	3.90E-1	1.95E-4

NO ₂ @ 3% excess O ₂ ----->>>	9.00	(ppmv)	SO ₂ @ 3% excess O ₂ ----->>>	0.33	(ppmv)
CO @ 3% excess O ₂ ----->>>	50.00	(ppmv)	PM @ 12% CO ₂ ----->>>	5.6E-09	(grain/ft ³)

See attached Table for Rule 1401 calculations, which indicates compliance with the Rule 1401 requirements.

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Application No. 498865 (Process Line) (D215 and D216)

Both the tanks with acids in this line are unheated, not rectified and not sparged. The parts heated in a salt bath are cleaned in the nitric acid tank and the plates used to remove the moisture from the heat treatment salt tank are cleaned in the phosphoric acid tank. I visited the facility and did not see any visible brown (NOx) fumes from the existing nitric acid tank, performing the same cleaning operation. The nitric acid is volatile and expected to emit nitric acid and particulate emissions. This nitric acid tank will be vented to an existing scrubber unit to reduce the nitric acid and particulate emissions. The phosphoric acid is not volatile. Thus, no emissions are expected from this tank as it is not sparged or heated. The nitric acid (acute toxic) controlled emissions are expected to be 0.008 lbs/hr (see attached spreadsheet). This emission level is well below the Tier 1 screening emission level of 0.043 lbs/hr for a very conservative 25 yard receptor. Thus, this equipment will comply with the Rule 1401 requirements.

Application No. 498866 (Scrubber) (C155)

As per scrubber specification, the scrubber is packed with packing media of 78 cu. ft. volume for acid fume neutralizing process and a mist eliminator to remove entrained fine mist particulates. The cross section of the scrubber is 39 sq. ft. The exhaust rate will be 18000 cfm. Water will be re-circulated at 3.85 gallon per minute per sq. ft. or 150 gallon per minute (gpm). This type of scrubber can have about 60% control efficiency for chemicals and particulates.

Fan Check: Pressure drop (PD) is 1.5 inches of water column.

$$\begin{aligned} \text{H. P.} &= \text{cfm} \times \text{PD} / 6356 \times \text{motor. efficiency)} \\ &= 18000 \times 1.5 / 6356 \times 0.6 = 7.0 \end{aligned}$$

The fan will have a 40 H. P. motor, which is more than adequate.

Residence Time:

$$\begin{aligned} \text{Packing Volume:} & 78 \text{ cu. ft.} \\ \text{Flow Rate} &= 180300 \text{ ft}^3/\text{min} = 18000/60 = 300 \text{ ft}^3/\text{sec} \\ \text{Residency Time} &= 78/300 = 0.26 \text{ sec.} \end{aligned}$$

The applicant requested to deviate from conditions C8.2, C8.4, C8.5 and K67.7 during the maintenance of the scrubber under A/N 497477. The applicant agreed to cover the tanks and/or not to use the tanks for cleaning operation during the maintenance work. A pH greater than 7.5 will be a new requirement.

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Criteria Pollutant Emissions (PTE) From The Project, (lbs/day)

Application #	VOC	NOx	CO	PM10	SOx
498864	0.22	0.46	1.56	0.30	0.02
498865	N/A	N/A	N/A	0.19	N/A
TOTAL	0.22	0.46	1.56	0.49	0.02

RULES/REGULATION EVALUATION

▫ *RULE 212, PUBLIC NOTIFICATION*

▼ *SECTION 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 not located within 1,000 feet from the outer boundary of a school. Therefore, public notice will not be required by this section.

▼ *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 in subdivision (g). As shown in the following table, the emission increases from this project are below the daily maximum limits specified by Rule 212(g). Therefore, these applications will not be subject to this section.

LB/DAY	CO	NOX	PM ₁₀	ROG	Lead	SOX
MAX. LIMIT	220	40	30	30	3	60
INCREASES	1.56	0.46	0.49	0.22	0	0.02

▼

SECTION 212(c)(3):

The Tier 2 assessment indicated a cancer risk of 0.0247 in a million for the residential receptor and 0.00569 in a million for a commercial receptor due to toxic emissions from the boiler natural gas combustion. The chemical process line does not use any carcinogenic air toxic compounds. Therefore, public notice will not be required by this section.

▼ *SECTION 212(g):*

This section requires a public notice for all new or modified sources which undergo construction or modifications resulting in emissions increase exceeding any of the daily maximum specified in the table below. As shown in the following table, the emission increases from this project are below the daily maximum limits specified by Rule 212(g). Therefore, public notice will not be required by this section.

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LB/DAY	CO	NOX	PM ₁₀	ROG	Lead	SOX
MAX. LIMIT	220	40	30	30	3	60
INCREASES	1.56	0.46	0.49	0.22	0	0.02

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

With proper use of this equipment compliance with the provisions of these rules is expected. District database has no records of any visible emissions or nuisance complaints against this company from other similar equipment.

▫ **RULES 404, 405 PARTICULATE MATTER CONCENTRATION & WEIGHT**

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

▫ **RULE 407, GASEOUS AIR CONTAMINANTS**

The manufacturer of the equipment has guaranteed 50 ppmv CO emission concentrations. Thus, compliance with the rule requirements (<2000 ppmv) is expected.

▫ **RULE 431.1, SULFUR CONTENT OF GASEOUS FUELS**

Only natural gas energy will be utilized to operate the boiler, which will comply with the rule requirements.

REGULATION XIII

Honeywell International is a NO_x RECLAIM facility. Thus, compliance with Reg. XIII is still required for VOC, CO and PM₁₀ emissions.

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

Since the VOC, CO and PM₁₀ emissions are expected to be <0.5 lb/day. BACT is not triggered.

▫ **RULE 1303(b)(1), MODELING**

Modeling is not required since PM₁₀, NO_x and CO emissions are below the Table A-1 allowable emissions.

NO _x (lbs/hr)		PM ₁₀ (lbs/hr)		CO (lbs/hr)	
Allowed	Actual	Allowed	Actual	Allowed	Actual
0.31	0.03	1.9	0.02	17.1	0.11

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

Since the VOC and PM₁₀ emissions are expected to be <0.5 lb/day, offsets are not required.

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

As described above a Tier 2 Risk Assessment calculation indicated cancer risk to be less than 1 in a million and acute and chronic hazard index risks to be below 1 from the boiler and the process line. Thus, compliance with the Rule 1401 requirements is expected (please see attached spreadsheets).

⊙ **RULE 2005, NEW SOURCE REVIEW FOR RECLAIM**

(c)(1)(A) Best Available Control Technology

The boiler will operate with a low NOx burner with <9 ppmv NOx emissions at 3% O₂. BACT for boiler will be complied with this level of emissions.

(c)(1)(B) Modeling

Modeling is not required since NOx emissions at 0.02 lbs/hr, are below the Table A allowable emissions of 1.26 lbs/hr..

(c)(2) Offsets

Honeywell International holds sufficient RTCs to offset the NOx emission increases from the boiler.

(g)(4)

A modeling analysis for plum visibility is not required since the net emission increase from the boiler do not exceed 40 tons/year of NOx.

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), 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:

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

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CO	220
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* 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 3rd permit revision to the Title V renewal permit issued to this facility on September 22, 2004. The following table summarizes the cumulative emission increases resulting from all permit revisions since the Title V renewal permit was issued:

Revision No.	Revision Description	HAP	VOC	NO _x *	PM ₁₀	SO _x	CO
1 st Permit Revision-	admin. change to remove devices D37, D69, C70, C71 & C72 and update the responsible official	0	0	0	0	0	0
2 nd Permit Revision	install new portable plasma arc cutter (D213) & modify/change conditions on a stationary plasma arc cutter (D199)	0	0	0	0	0	
	modify/change conditions on five test cells (D124, D125, D126, D127 & D128)	0	0	0	0	0	0
	install new nitric acid cleaning tank (D214),	0	0	0	0	0	0
3 rd Permit Revision	P/C for new boiler D217 (A/N 498864), PC for new Al surface prep line, D215, D216 (A/N 498865) and PC for modification of scrubber C155 (A/N 498866) to vent new tank D215.	0	0.22	0.46	0.49	0.02	1.56
Cumulative Total		0	0.22	0.46	0.49	0.02	1.56
Maximum Daily		30	30	40*	30	60	220

* RECLAIM pollutant, not subject to emission accumulation requirements

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.

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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.

Since NOx is a RECLAIM pollutant for this facility, a separate analysis shall be made to determine if the proposed permit revision is considered a “minor permit revision” for RECLAIM pollutants. Section B of the Title V permit shows that this facility’s NOx starting Allocation plus the non-tradable Allocation is 7,395 pounds. The proposed project is expected to result in an increase of 1 lbs/day (365 lbs/year) of NOx emissions from this permit revision, less than the starting Allocation plus the non-tradable Allocations of 7,395 pounds. As a result, this proposed project is considered as a “minor permit revision” for RECLAIM pollutants.

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), and a “minor permit revision” for RECLAIM pollutants, 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/RECLAIM permit will be issued to this facility.