

**PERMIT TO
CONSTRUCT EVALUATION**

Applicant's Name	TABC
Company ID	0003968
Mailing Address	6375 N. PARAMOUNT BLVD., LONG BEACH, CA 90805
Equipment Address	SAME AS ABOVE

EQUIPMENT DESCRIPTION:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions and Requirements	Conditions
PROCESS 3: STORAGE					
STORAGE SILO, POLYPROPLYNE BEADS, CONAIR, MODEL NO. SAS-11.5-36, 11'-6" DIA. X 36'-0" H., 3,065 CU. FT. OF TOTAL VOLUME. A/N 527465	D365	C366		PM (5) [RULE 405, 2-7-1986]	B27.1, C1.1, D323.1, K67.6
PROCESS 4: AIR POLLUTION CONTROL SYSTEMS					
SYSTEM 1: BAGHOUSES					
BAGHOUSE, FLEX-KLEEN, MODEL NO. 84-BVBC-16 (IIIIG), WITH SIXTEEN FILTER BAGS, TOTAL FILTER AREA OF 170 SQ. FT, AND A 3 HP BLOWER. A/N 527466	C366			PM (9) [RULE 404, 2-7-1986;]	D12.2, D322.1, D381.1, E102.1, K67.3

A/N 519361:

RECLAIM/TITLE V PERMIT REVISION, DEMINIMUS SIGNIFICANT

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BACKGROUND:

TABC, Inc. filed A/Nos 527465 & 66 on September 22, 2011 as new construction for installation of a Polypropylene storage silo and corresponding baghouse. TABC is in business of manufacturing catalyst for Toyota's automobile catalytic converter systems. The proposed silo will store polypropylene beads used as a raw material in new plastic injection molding operations to manufacture automobile parts. The silo is filled pneumatically via delivery truck and is vented to the baghouse.

The plastic injection process itself is exempt from permitting requirements as per Rule 219 (j).

This facility is in the RECLAIM/Title V program. A/N 5274691 was filed for the RECLAIM/Title V permit revision (DE MINIMUS). The latest Title V renewal was issued on 11/2/2010. This application is part of the 2nd Title V permit revision since then.

The facility has been operating with a Title V permit since 2000. The facility has been subject to both self-reporting requirements and AQMD inspections. The facility has had no citizen complaints or Notices of Violation issued in the last two years. However, a Notice to Comply was issued on 6/23/11 (E05231) asking the company to submit Quarterly Emissions Report by its due date. The facility complied with the Notice to Comply on 6/30/11.

PROCESS DESCRIPTION:

The proposed silo will store polypropylene beads used as a raw material in new plastic injection molding operations to manufacture automobile parts. The silo is filled pneumatically via delivery truck and is vented to the baghouse.

It takes about 3 hours ($[80000 \text{ lb/day} / (750 \text{ std. CF/hr} \times 38 \text{ lb/std. CF})]$) to fill up the silo. The silo is filled about 5 times a month. For data entry purposes, 3 hours/day, 2 days/week, 52 weeks/yr schedule will be used.

EMISSIONS AND ANALYSIS:

The loading operations will be source of particulate matter emissions.

Given:

- Material Receiving:
 - 196 tons/month (maximum)
 - 14.25 tons/hour (maximum) [$750 \text{ std. CF/hr} \times 38 \text{ lb/std. CF} - \text{Bead Density}$]
 - 3 hr./day (maximum)
 - 5 days/month

Emission Factors

PM emissions factor (assumed):

Uncontrolled = 0.1 lb./ton material

Controlled = 0.01 lb./ton material (baghouse is 99% efficient in controlling PM emissions)

PM₁₀ = 0.5 PM

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RECEIVING OF MATERIAL FROM TRUCKS TO SILO:

Throughput tons/hr	E. F. Uncontrolled lb./ton	R1 lb./hr	PM ₁₀ lb./hr	E. F. Controlled lb./ton	R2 lb./hr	PM ₁₀ lb./hr
14.25	0.1	1.43	0.7	0.001	0.014	0.007

Daily PM₁₀ emissions

$$0.007 \text{ lb./hr} \times 3 \text{ hr/day} = 0.02 \text{ lb./day} \times 5 \text{ days/month} \times 12 \text{ months/yr} = 1.2 \text{ lb./year.}$$

The 30-day average is

$$0.02 \text{ lb./day} \times 1.2 \text{ days/week} \times 4.33 \text{ weeks/month} \times 1 \text{ month/30 days} = 0 \text{ lb./day}$$

ALLOWABLE PROCESS RATE

$$391,250 \text{ lb./month} \times 1 \text{ ton}/2,000 \text{ lbs} = 196 \text{ tons/month}$$

RULE 404

$$\text{Conc. (gr/scf)} = \frac{\text{PM Emissions (lb/hr)} \times 7,000 \text{ gr/lb}}{\text{Exhaust flow rate (scfm)} \times 60 \text{ min/hr}}$$

$$\text{Conc.} = \frac{0.014 \text{ lb/min} \times 7000}{750 \times 60}$$

$$= 0.0022 \text{ gr/scf}$$

RULE 405

Process Weight Rate = 28,500 lb./hr
 Calculated Emissions = 0.014 lb./hr
 Allowed Emissions = 12.6 lb./hr (Approx.)

TOXIC EVALUATION:

The MSDS submitted with the application indicates that Polypropylene beads does not contain any compounds identified in Table 1 of Rule 1401. Therefore, no further evaluation is required for toxics.

RULES:

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

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- RULE 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 subparagraph (g). The emission increase from this project is less than the daily maximums. Therefore, public notice will not be required by this section.

- RULE 212(c) (3) There are no toxic emissions from this equipment as the company doesn't plan to use any material that contains toxic air contaminants in the silo. Therefore public notice will not be required by this section.

- RULE 212(g) This section requires a public notice for all new or modified permit units which undergo construction or modifications resulting in an emissions increase exceeding any of the daily maximums as specified in subparagraph (g). The maximum potential PM10 emissions from this equipment are less than 0.5 lb/day; therefore, public notice will not be required by this section.

- RULE 401 Visible emissions are not expected with proper operation of this equipment.
- RULE 402 Operation of equipment is not expected to create a nuisance.
- Rule 404: This rule allows a maximum of 0.196 gr/scf for exhaust flow rate of 883 scfm or less. The calculated gr/scf from the loading operations is 0.0022. Therefore, compliance is achieved with this rule.

- Rule 405: For a process weight of 28,500 lb/hr, this rule allows PM emissions of approx. 12.6 lb/hr. The emissions from this operation is 0.014 lb/hr. Therefore, compliance is achieved with this rule.

- REG. XIII 1303(a): The silo is vented to the baghouse which is BACT for this operation. Thus, the requirements of this section are satisfied.
1303(b) (1): PM10 emissions are below the allowable emissions in Table A-1 of Rule 1303. Therefore, Modeling is not required.
1303(b) (2): External offsets are not required as the 30-day ave. is less than 0.49 lb/day.

- RULE 1401 Compliance with this rule is expected as Polypropylene beads does not contain any compounds identified in Table 1 of Rule 1401.

- Regulation XX: The proposed project does not increase NOx or SOx emissions and thus this regulation is not applicable.

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Regulation XXX:

This facility is in the RECLAIM/Title V program. The proposed project is considered as a “de minimis significant permit revision” to the Title V permit for this facility.

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 hazardous air pollutants (HAPs) from these permit revisions during the term of the permit are not greater than any of the emission threshold levels on the following page:

Air Contaminant	Daily Maximum (lbs/day)
HAP	30
VOC	30
NO _x	40
PM10	30
SO _x	60
CO	220

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 Title V renewal permit shall be accumulated and compared to the above threshold levels. This proposed project is the 2nd permit revision to the Title V renewal permit issued to this facility on November 2, 2010. The following table summarizes the cumulative emission increases resulting from all permit revisions since the Title V renewal permit was issued.

Title V Permit Revisions Summary

	Revision	HAP	VOC	NO _x	PM ₁₀	SO _x	CO
Previous Revisions	Inactivation of Catalyst manufacturing line	0	0	0	0	0	0
2 nd	Permit Revision: Installation of Silo and Baghouse (a/nos. 527465-66).	0	0	0	0	0	0
Cumulative Total		0	0	0	0	0	0
Maximum Daily		30	30	40	30	60	220

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 minimus significant permit revision”.

CONCLUSION:

The proposed project is expected to comply with all applicable District Rules and Regulations. Since the proposed project is considered as a “de minimus significant permit revision”, it is exempt

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from the public participation requirements under Rule 3006 (b). A proposed facility 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 RECLAIM/Title V permit will be issued to this facility with the following conditions:

CONDITIONS:

A/N 527465

B27.1. The operator shall not use materials containing any compounds identified in the SCAQMD Rule 1401 as amended 09/10/2010.

C1.1 The total quantity of material received by this equipment shall not exceed 196 tons in any one month.

D323.1The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on an annual basis, at least, unless the equipment did not operate during the entire annual period. The routine annual inspection shall be conducted while the equipment is in operation and during daylight hours.

If any visible emissions (not including condensed water vapor) are detected that last more than three minutes in any one hour, the operator shall verify and certify within 24 hours that the equipment causing the emission and any associated air pollution control equipment are operating normally according to their design and standard procedures and under the same conditions under which compliance was achieved in the past, and either:

- 1). Take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in section k of this permit; or
- 2). Have a CARB-certified smoke reader determine compliance with the opacity standard, using EPA method 9 or the procedures in the CARB manual "visible emission evaluation", within three business days and report any deviations to aqmd.

The operator shall keep the records in accordance with the recordkeeping requirements in section k of this permit and the following records:

- 1). Stack or emission point identification;
- 2). Description of any corrective actions taken to abate visible emissions;
- 3). Date and time visible emission was abated; and

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4). All visible emission observation records by operator or a certified smoke reader.

K67.6: The operator shall keep records, in a manner approved by the district, for the following parameter(s) or item(s):

The total amount of material loaded in the silo per month. records shall be maintained for at least five years and made available to the district personnel upon request.

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D12.2 The operator shall install and maintain a(n) differential pressure gauge to accurately indicate the differential pressure across the filter.

D322.1 The operator shall perform annual inspection of the equipment and filter bags for leaks, broken or torn filter media, and improperly installed filter bags.

D381.1 The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on an annual basis, at least, unless the equipment did not operate during the entire annual period. The routine annual inspection shall be conducted while the equipment is in operation and during daylight hours. If any visible emissions (not including condensed water vapor) are detected, the operator shall take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in section k of this permit.

The operator shall keep the records in accordance with the recordkeeping requirements in section k of this permit and the following records:

- 1). stack or emission point identification;
- 2). description of any corrective actions taken to abate visible emissions; and
- 3). date and time visible emission was abated.

E102.1 The operator shall discharge dust collected in this equipment only into closed containers.

K67.3 The operator shall keep records, in a manner approved by the district, for the following parameter(s) or item(s):

The date, time and description of any maintenance or repairs resulting from the inspection.

The name of the person performing the inspection and/or maintenance of the baghouse.

The date, time and results of the inspection.