

# South Coast Air Quality Management District

## Statement of Basis

### Proposed Title V Renewal Permit

<b>Facility Name:</b>	MonierLifetile LLC
<b>Facility ID:</b>	115622
<b>SIC Code:</b>	3272
<b>Equipment Location:</b>	3511 N. Riverside Ave. Rialto, CA 92377
<b>Application No.:</b>	500929
<b>Application Submittal Date:</b>	07/28/2009
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#### 1. Introduction and Scope of Permit

Title V is a national operating permit program for air pollution sources. Facilities subject to Title V must obtain a Title V permit and comply with specific Title V procedures to modify the permit. This permit replaces the facility's other existing permits. Title V does not necessarily include any new requirements for reducing emissions. It does, however, include new permitting, noticing, recordkeeping, and reporting requirements.

Pursuant to Title V of the Federal Clean Air Act and Air Quality Management District (AQMD) Rule 3004(f), a Title V permit shall expire five years from the date of issuance unless such permit has been renewed. Accordingly, each facility is required to submit a Title V renewal application and request the AQMD to renew their Title V permit. The proposed permit incorporates updates to the facility information provided in the facility's Title V renewal application and all rules and regulations that are currently applicable to the facility.

The AQMD implements Title V through Regulation XXX – Title V Permits, adopted by the AQMD Governing Board in order to comply with Environmental Protection Agency's (EPA) requirement that local air permitting authorities develop a Title V program. Regulation XXX was developed with the participation of the public and affected facilities through a series of public workshops, working group meetings, public hearings and other meetings.

The Title V major source threshold for a particular pollutant depends on the attainment status of the pollutant. CO, NO<sub>2</sub>, SO<sub>2</sub>, and lead are in attainment with federal standards. The status for PM-10 is serious nonattainment. The status for ozone is currently extreme nonattainment.

A Title V renewal permit is proposed to be issued to cover the operations of MonierLifetile LLC located at 3511 N. Riverside Avenue, Rialto, CA. This facility is subject to Title V requirements because it is a major source.

## **2. Facility Description**

This is an existing facility applying for a Title V permit renewal that is in the business of concrete roof tile manufacturing. This facility is operating permitted cement, aggregate, fly ash and sand storage and handling, three roofing tile manufacturing lines, three sealer booths, dust collectors, color oxide mixers, baghouses and an afterburner.

## **3. Construction and Permitting History**

The facility has been in constant operation at this location since 1984. The first permit to operate at this facility was issued in 1998. Numerous permit revisions have been approved for this facility since the issuance of the initial Title V Permit. This is a renewal of the company's Title V permit.

## **4. Regulatory Applicability Determinations**

Applicable legal requirements for which this facility is required to comply are required to be identified in the Title V permit (for example, Sections D, E, and H of the proposed Title V permit). Applicability determinations (i.e., determinations made by the District with respect to what legal requirements apply to a specific piece of equipment, process, or operation) can be found in the Engineering Evaluations. This facility is not subject to any New Source Performance Standards (NSPS) or National Emissions Standards for Hazardous Air Pollutants (NESHAPs) requirements.

## **5. Monitoring and Operational Requirements**

Applicable monitoring and operational requirements for which the facility is required to comply are identified in the Title V permit (for example, Sections D, F, and J and Appendix B of the proposed Title V permit). Discussion of any applicable operational requirements can be found in the Engineering Evaluations. All periodic monitoring requirements were developed using strict adherence to the following applicable guidance documents: SCAQMD Periodic Monitoring Guidelines for Title V Facilities (November 1997); California Air Pollution Control Officer's Association/California Air Resources Board/Environmental Protection Agency (CAPCOA/CARB/EPA) Region IX Periodic Monitoring Recommendations for Generally Applicable Requirements in State Implementation Plan (SIP) (June 1999); and CAPCOA/CARB/EPA Region IX Recommended Periodic Monitoring for Generally Applicable Grain Loading Standards in the SIP: Combustion Sources (July 2001). The potential pre-control VOC emissions of three sealer booths exceed the major source threshold of 10 tons per year. As a result, the control device (afterburner) is subject to the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64. Permit conditions have been added to satisfy the CAM requirements. Such permit conditions were developed using the design criteria and other

pertinent requirements identified in 40 CFR 64 - Compliance Assurance Monitoring and Technical Guidance Document and in the August 1998 Revised Draft CAM.

## 6. Permit Features

### Permit Shield

A permit shield is an optional part of a Title V permit that gives the facility an explicit protection from requirements that do not apply to the facility. A permit shield is a provision in a permit that states that compliance with the conditions of the permit shall be deemed compliance with all identified regulatory requirements. To incorporate a permit shield into the Title V permit involves submission of applications for change of conditions for each equipment affected by the permit shield. Permit shields are addressed in Rule 3004 (c). This facility has not applied for a permit shield.

### Streamlining Requirements

Some emission units may be subject to multiple requirements which are closely related or redundant. The conditions may be streamlined to simplify the permit conditions and compliance. Emission limits, work practice standards, and monitoring, recordkeeping, and reporting requirements may be streamlined. Compliance with a streamlined condition will be deemed compliance with the underlying requirements whether or not the emission unit is actually in compliance with the specific underlying requirement. This facility has not applied for any streamlined conditions.

## 7. Summary of Emissions and Health Risks

### **Criteria Pollutant Emissions (tons/year) Annual Reported Emissions for Reporting Period 2009**

Pollutants	Emissions (tons/year)
CO	0.058
NOX	0.217
ROG	1.511
SOX	0.001
PM	0.519

### **Toxic Air Contaminants Emissions (TAC) Annual Reported Emissions for Reporting Period 2009**

The Following TACs Were Reported	Emissions, lbs/yr
Ammonia	60.241
Benzene	0.026
Chromium (VI)	0.000
Formaldehyde	0.056
Lead (inorganic)	0.020
Naphthalene	0.001
PAHs, total, with components not reported	0.000

### **Health Risk from Toxic Air Contaminants**

The facility is subject to review by the Air Toxics Information and Assessment Act (AB2588). The AQMD has determined that this facility is exempt from AB 2588 requirements.

#### **8. Compliance History**

As noted, the facility has been in constant operation since 1984. The facility has been subject to both self-reporting requirements and AQMD inspections. The facility has had no citizen complaints filed and one Notice of Violation issued in the last two years. Notice of Violation P52338 was for failure to submit the Title V Annual Compliance Certification for reporting period of 01/01/09 to 12/31/09. Notice of Violation has been resolved.

#### **9. Compliance Certification**

By virtue of the Title V permit application and issuance of this permit, the reporting frequency for compliance certification for the facility shall be annual.