

<b>South Coast Air Quality Management District</b> <b>ENGINEERING AND COMPLIANCE</b> Coating, Printing and Aerospace Operations Team  <b>PERMIT APPLICATION EVALUATION</b>	Page	1 of 10
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	Processed by	Rene Loof
	Reviewed by	Hamed Mandilawi
	Date	11/21/14

**PERMIT TO CONSTRUCT EVALUATION**  
**Soil Vapor Extraction (new construction)**

**Applicant's Name:** Rohr, Inc.

**Company ID No.:** 800113

**Mailing Address:** 8200 Arlington Ave., Riverside, CA 92503

**Equipment Address:** 8200 Arlington Ave., Riverside, CA 92503

**PERMIT TO CONSTRUCT**

**Title V Permit Revision Application:**

A/N 569126:

**EQUIPMENT DESCRIPTION:**

Equipment	ID No.	Connected To	Source Type/ Monitoring Unit	Emissions	Conditions
<b>Process 21: SOIL VAPOR EXTRACTION</b>					
CARBON ADSORBER, GRANULATED ACTIVATED CARBON, TWO VESSELS IN SERIES, 10,000 LBS EACH WITH A <del>50</del> 75-HP VACUUM BLOWER, 2500 CFM.	C256				C6.21, C6.22, C6.23, D90.3, D90.4, D90.5, E71.5, E128.1, E153.2, H23.16
VAPOR EXTRACTION WELLS, <del>39</del> UP TO 75 TOTAL, AIR SPARGING WELLS, <del>42</del> UP TO 40-TOTAL. WITH <del>A TWO</del> 2030-HP COMPRESSORS.					
Reference: A/N: <del>510198</del> 569125					

C6.21 The operator shall use this equipment in such a manner that the hydrocarbon concentration being monitored, as indicated below, does not exceed ~~5~~10 ppm.

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The operator shall install and maintain a(n) continuous monitoring system to accurately indicate the hydrocarbon concentration between the primary and secondary carbon vessels.  
 [Devices subject to this condition : D256]

C6.22 The operator shall use this equipment in such a manner that the temperature being monitored, as indicated below, does not exceed 120 Deg F.

To comply with this condition, the operator shall install and maintain a(n) temperature gauge to accurately indicate the temperature of the vapor stream at the inlet to the primary carbon vessel.  
 [Devices subject to this condition : D256]

C6.23 The operator shall use this equipment in such a manner that the flow being monitored, as indicated below, does not exceed 2500 CFM.

The operator shall install and maintain a flow indicator at the inlet to the carbon adsorption system to measure the total air flow rate through the carbon adsorbers in cubic feet per minute (CFM).  
 [Devices subject to this condition : D256]

D90.3 The operator shall continuously monitor the hydrocarbon concentration across the primary and secondary carbon vessels according to the following specifications:

The operator shall use a flame ionization detector (FID) ~~or equivalent instrument~~ to monitor the parameter.

The operator shall calibrate the instrument used to monitor the parameter in ppmv ~~hexane~~ Propane.

The operator shall also install and maintain a device to continuously record the parameter being monitored.

The analyzer shall be maintained and calibrated according to the EPA method ~~2418~~ requirements

Vapors shall not be extracted from the soil unless they are vented to the carbon adsorption system as described in the equipment description. The extraction and carbon adsorption system shall be leak free between the outlet of the blower and the outlet of the adsorption system.

Upon completion, the vapor extraction wells and ducts shall be capped to prevent vapors from venting to the atmosphere  
 [Devices subject to this condition : D256]

D90.4 The operator shall periodically sample the hydrocarbon concentration across the carbon adsorption system according to the following specifications:

The operator shall sample once every day after the first 15 days of operation for 10 days.

Sampling and analysis shall be conducted by an independent laboratory per Rule 304

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Sampling shall conform to CARB method 422 or equivalent. Samples with high moisture shall be collected using an appropriate method such as SCAQMD method 25.1/25.3 or other methods approved by the SCAQMD

Analysis shall be conducted using EPA method TO15 or other methods approved by SCAQMD.

The samples collected will check for Total Organic Compounds and Speciated Non-methane Organic Compounds.

Samples shall be collected at the inlet and outlet of the carbon adsorption system.

The operator shall submit to the District in writing the results of the sampling including but not limited to monitoring, lab analysis, flow, and temperature readings to prove compliance with the conditions of this permit. Submittal shall be within 45 days of start-up.  
 [Devices subject to this condition: D256]

D90.5 The operator shall periodically sample the hydrocarbon concentration across the carbon adsorption system according to the following specifications:

The operator shall sample once after six months but no later than nine months after start-up operation.

Sampling and analysis shall be conducted by an independent laboratory per Rule 304

Sampling shall conform to CARB method 422 or equivalent. Samples with high moisture shall be collected using an appropriate method such as SCAQMD method 25.1/25.3 or other methods approved by the SCAQMD

Analysis shall be conducted using EPA method TO15 or other methods approved by SCAQMD.

The samples collected will check for Total Organic Compounds and Speciated Non-methane Organic Compounds.

Samples shall be collected at the inlet and outlet of the carbon adsorption system.

E71.5 The operator shall only use this equipment if it is equipped with an automatic shut down which will shut down the extraction blower when the exhaust of the primary carbon vessel hydrocarbon concentration exceeds ~~5~~10 ppmv measured as ~~hexane~~Propane.  
 [Devices subject to this condition : D256]

E128.1 The operator shall keep all spent carbon in a tightly covered container which shall remain closed except when it is being transferred into or out of the container.  
 [Devices subject to this condition : D256]

E153.2 The operator shall change over the carbon in the adsorber whenever breakthrough occurs.

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When breakthrough occurs, the system shall be shut down until the spent carbon vessel is replaced or replenished.

For the purpose of this condition, breakthrough shall be defined as an exhaust hydrocarbon concentration from the primary vessel in excess of ~~5~~10 ppmv measured as ~~hexane~~Propane.

The activated carbon used in the carbon vessels shall have a butane activity number of not less than 23.5 as measured by ASTM method 5742 or a CTC no. not less than 60% as measured by ASTM method D3467

To change over the carbon, the operator shall replace the first carbon canister with a fresh carbon canister. After the new carbon canister is installed, it shall become the last carbon canister in series. [Devices subject to this condition : D256]

H23.16 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule/Subpart
VOC	District Rule 1166

[Devices subject to this condition : D256]

**Background:**

Rohr Inc. has filed application no. 569125 on 10/15/2014 as a modification to an existing soil vapor extraction system previously permitted under application no. 510198. The original permit to construct was issued on July 6, 2010 and was designed to remove chlorinated hydrocarbons from the contaminated soil. The modification is looking to increase the number of wells to clean up a greater area of contaminated ground water.

The vapors collected in the SVE has a measurable concentration of methane. Because the methane would pass through the activated carbon, false readings were recorded with the FID. Rohr installed a GC analyzer to identify the methane concentration and deducted it from the overall FID reading to generate a non-methane hydrocarbon concentration. Rohr has requested that the calibration be conducted using propane because the GC analyzer used to separate the methane from the exhaust is calibrated by the manufacturer using a methane/propane standard. The standards of methane/propane used to calibrate their device is acceptable under EPA method 18 and 25A and are readily available.

Rohr, Inc. is a subsidiary of the Goodrich Corporation, and is a large producer of military and commercial aerospace products. Rohr Inc., performs metal and composite materials processing, structural bonding and assemble operations at its facility located in Riverside, California. Manufacturing processes conducted at this location include composite bonding, resin curing, core stabilizing, primer and topcoat spray coating, roller coating , degreasing, solvent cleaning, metal surface preparation, abrasive blasting, tool preparation, and tool storage. All manufacturing processes conducted at this facility are operated under stringent Federal Aviation Administration (FAA) regulations and commercial aircraft and military specifications.

The company is a Title V source and is a Cycle 2 RECLAIM facility for NOx emissions. The company is located in an industrial zone with nearby residential areas located to the north and south of the property. A

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review of District compliance records indicates that there are no Public Complaints, Notices of Violation or Notices to Comply issued against this facility over the past two years. The facility is currently operating in compliance with applicable permit conditions and rules and regulations.

**Process Description:**

The Soil Vapor Extraction system currently consists of 39 extraction wells and 12 sparging wells. The modification will increase the number of wells to 75 extraction wells and 40 air sparging wells. The vacuum blower is used to recover soil vapors and vapors generated by the injection of compressed air into the ground water through a series of air sparging wells. The collected vapors are exhausted through a dual bed in series each consisting of 10,000 pounds activated carbon. A spare 10,000 pound carbon bed is in place for immediate replacement when break through occurs. The blower is capable of generating a maximum flow rate of 2500 cubic feet per minute.

The extracted vapors will be treated by the first vessel and exhausted through the second as a polishing unit. The exhaust of the primary will be monitored by a flame Ionization Detector (FID) with the results reported in ppmv propane and is equipped with a Gas Chromatograph functionality that is capable of separating methane concentrations from total hydrocarbon concentrations. When break through occurs, the primary vessel will be taken offline. The secondary vessel will become the primary and the replacement vessel the new secondary polishing unit. The spent carbon from the first vessel will be replaced with fresh carbon and that unit will be used as the spare following the next change out. This alternating cycle will be repeated to ensure optimum system performance. Audible alarms and a shut down will be used to alert the operator when break through has occurred. To ensure that no contaminants are vented to the atmosphere, a Photo Ionization Detector (PID) will be use to measure the effluent from the exhaust stack.

**Emissions Calculations:**

Operating Scheduling: 24hours/day, 7 days/week, 52 weeks/year

VOC emissions:

Extracted Vapor Contaminants	CAS #	Flow Rate Scfm (70°F @ 14.7 psia)			Max. Conc. (ppmv)	Max. Emission (lbs/hr)	Toxic
		Min	Avg	Max			
Benzene	71-43-2	1500	1950	2500	1.18E-01	3.57E-03	Yes
CFC-11*	75-69-4	1500	1950	2500	9.95E-05	5.30E-06	
Freon 113*	76-13-1	1500	1950	2500	1.81E-01	1.31E-02	
Chloroform	67-66-3	1500	1950	2500	2.25E-01	1.04E-02	Yes
m-Dichlorobenzene	541-73-1	1500	1950	2500	5.77E-07	3.29E-08	
1,1-Dichloroethane	75-34-3	1500	1950	2500	1.60E+00	6.12E-02	Yes
1,2-Dichloroethane	107-06-2	1500	1950	2500	1.95E-01	7.48E-03	Yes
1,1-Dichloroethene	75-35-3	1500	1950	2500	9.83E+01	3.69E+00	
Cis-1,2-Dichloroethene	156-59-2	1500	1950	2500	5.88E+00	2.21E-01	
Trans-1,2-Dichloroethene	156-60-5	1500	1950	2500	1.88E-01	7.07E-03	
1,2-Dichloropropane	78-87-5	1500	1950	2500	1.29E-05	5.67E-07	
Ethyl Benzene	100-41-4	1500	1950	2500	1.90E-01	7.80E-03	Yes

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4-Methyl-2-Pentanone	108-10-1	1500	1950	2500	5.84E-05	2.27E-06		
2-Phenylbutane	135-98-8	1500	1950	2500	2.72E-07	1.41E-08		
1,1,2,2-Tetrachloroethane	79-34-5	1500	1950	2500	1.32E-06	8.61E-08	Yes	
Styrene	100-42-5	1500	1950	2500	1.72E-01	6.94E-03	Yes	
Tetrachloroethene*	127-18-4	1500	1950	2500	1.91E-01	1.23E-02	Yes	
Toluene	108-88-3	1500	1950	2500	1.93E-01	6.89E-03	Yes	
Trichloroethene	79-01-6	1500	1950	2500	2.28E+01	9.19E-01	Yes	
1,1,1-Trichloroethane*	71-55-6	1500	1950	2500	1.13E+01	5.83E-01	Yes	
1,1,2-Trichloroethane	79-00-5	1500	1950	2500	6.31E-06	3.26E-07	Yes	
1,2,3-Trichloropropane	96-18-4	1500	1950	2500	2.38E-06	1.36E-07		
1,2,4-Trimethylbenzene	95-63-6	1500	1950	2500	1.86E-01	8.68E-03		
1,3,5-Trimethylbenzene	108-67-8	1500	1950	2500	1.86E-01	8.68E-03		
Vinyl Chloride	75-01-4	1500	1950	2500	6.86E-02	3.91E-03	Yes	
M,p,-Xylenes	108-38-3	1500	1950	2500	2.02E-01	8.29E-03	Yes	
o-Xylenes	95-47-6	1500	1950	2500	1.59E-01	8.09E-03	Yes	
* Non-VOC Materials						Total Uncontrolled Emissions		5.59 lbs/hr Total Org
								4.98 lbs/hr VOC

Hourly:

Assume 99% control for the Primary vessel

TOG Emissions:

$$R1 = 5.59 \text{ lbs/hr}$$

$$R2 = 5.59 \text{ lbs/hr}(1-0.99) = 0.0559 \text{ lbs/hr}$$

VOC Emissions:

$$R1 = 4.98 \text{ lbs/hr}$$

$$R2 = 4.98 \text{ lbs/hr}(1-0.99) = 0.0498 \text{ lbs/hr}$$

Daily:

Total Organics:

$$R1 = 5.59 \text{ lbs/hr}(24\text{hrs/day}) = 134.16 \text{ lbs/day}$$

$$R2 = 0.0559 \text{ lbs/hr}(24\text{hrs/day}) = 1.34 \text{ lbs/day}$$

Total VOC

$$R1 = 4.98 \text{ lbs/hr}(24\text{hrs/day}) = 119.52 \text{ lbs/day}$$

$$R2 = 0.0498 \text{ lbs/hr}(24\text{hrs/day}) = 1.20 \text{ lbs/day}$$

30 day average:

The secondary carbon vessel will reduce the emissions to

$$1.2 \text{ lbs/day}(1-0.99) = 0.012 \text{ lbs/day}$$

$$\text{VOC} = 0.0 \text{ lbs/day}$$

Permit Limit:(primary vessel break through)

10.0ppm inlet propane

$$R1 = (10.0 \text{ parts}/10^6)(2500 \text{ scfm})(\text{lbmol}/379 \text{ scf})(44.10 \text{ lb}/\text{lbmol})(60 \text{ min}/\text{hr})$$

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= 0.17 lbs/hr as Propane (inlet into primary vessel)

R2 = 0.17 lbs/hr(1-0.99) Secondary control  
 = 0.0017 lbs/hr as Propane  
 = 0.04 lbs/day

**Risk Assessment:**

From the previous evaluation under application no. 510198, The risk assessment determined that for TCE to exceed a Tier 2 one in a million cancer risk, an emission of 0.0345 lbs/hr TCE would have to occur. This emission is approximately 2 ppm. TCE makes up approximately 16 percent of the inlet contaminants. 2ppm TCE and 16 % of the inlet contaminants would result in an overall contaminant concentration of  $2/0.16 = 12.5$  ppm. With a limit of 10 ppm propane triggering a change out of the primary carbon vessel it is unlikely that the TCE emissions would exceed the Tier 2 limit. Also this is based on emissions from the primary carbon vessel. The emissions are further reduced through the secondary unit. Therefore the 10ppm limitation would restrict the toxic emissions to a risk of less than one a million and the acute and chronic hazard index to less than one. This modification will increase the number of wells but the volume will remain the same. There is no change in the ground water/soil concentrations, therefore no change in the risk will occur. Compliance with District Rule 1401 is expected.

**Evaluation & Rule Review**

Rule 212 (c)(1): This section requires a public notice for all new or modified permit units that emit air contaminants located within 1,000 feet from the outer boundary of a school.

A public notice is not required since Arlanza Elementary/Middle School is 1,081 ft from the source.

Rule 212 (c)(2): This section requires a public notice for all new or modified facilities that have on-site emission increases exceeding any of the daily maximums as specified by Rule 212(g).

The proposed project will not result in an emission increase for the entire facility. A Rule 212(c) (2) notice will not be triggered since there will be no emission increase by the addition of extraction/sparging wells to this system. The airflow drawn from the wells will remain the same with no expected increase in concentration. No Public notice will be required under this section since the daily maximum as specified in Rule 212(g) are exceeded.

Rule 212(c)(3): This section requires a public notice for all new or modified permit unit with increases in emissions of toxic air contaminants listed in Table I of Rule 1401 resulting in MICR greater than 1E-6 per permit unit or greater than 10E-6 per facility.

The proposed project will not result in an emission increase and the previous risk had not exceeded an MICR of one in a million or an HIC or HIA thresholds of 1.0. Public notice is not required under this section of the rule.

Rule 212(g): This section requires a public notice for all new or modified sources that result in emission increases exceeding any of the daily maximums as specified by Rule 212(g).

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The proposed modification of this soil vapor extraction equipment will not result in emission increase that will exceed the daily maximum as specified in Rule 212(g) and the following summarizes the emission increase:

	Maximum Daily Emissions					
	<u>ROG</u>	<u>NO<sub>x</sub></u>	<u>PM<sub>10</sub></u>	<u>SO<sub>2</sub></u>	<u>CO</u>	<u>Pb</u>
Emission increase	0	0	0	0	0	0
MAX Limit (lb/day)	<b>30</b>	<b>40</b>	<b>30</b>	<b>60</b>	<b>220</b>	<b>3</b>
Compliance Status	Yes	Yes	Yes	Yes	Yes	Yes

A public notice is not required since the emission increase is not above the thresholds.

- Rule 401: With proper operation and maintenance, compliance with this rule is expected.
- Rule 402: With proper operation and maintenance, compliance with this rule is expected.
- Rule 1166 The operation of this equipment is in compliance with District Rule 1166(c)(4)(A) & (B)(i) which reads as follows:
- 1166(c)(4) A person treating VOC-contaminated soil shall:
- (A) Obtain a permit to construct and operate treatment equipment, as applicable, from the Executive Officer, and
  - (B) Implement VOC-contaminated soil decontamination measures, as approved by the Executive Officer in writing, which result in Best Available Control Technology applied during all segments, and which include, but are not limited to, at least one of the following:
    - (i) Installation and operation of an underground VOC collection system and a disposal system prior to excavation.
- Compliance with this rule is expected.
- REG XIII: New Source Review.  
1303(b) States that a new permit unit must meet each of the following requirements if there is an emission increase:
- 1) BACT  
The Carbon Absorption system will satisfy the BACT requirements for soil vapor extraction.
  - 2) Modeling:  
There are no NOx, CO or PM10 emissions expected from the operation of this equipment. There are no modeling requirements for VOC emissions. Compliance is expected.
  - 3) Emission Offsets:  
No offsets are required since the proposed modification will not result in an emission increase.
  - 4) Facility Compliance:

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This facility is in compliance with all District Rule and Regulations.

5) Major Polluting Facilities:

The proposed modification will not result in any emission increase and therefore is not a major polluting facility nor is it a major modification to a major polluting facility.

Rule 1401: Toxics: Rule 1401 contains the following requirements:

- 1) *(d)(1) MICR and Cancer Burden* - The cumulative increase in MICR which is the sum of the calculated MICR values for all toxic air contaminants emitted from the new, relocated or modified permit unit will not result in any of the following:
  - (A) an increased MICR greater than one in one million ( $1.0 \times 10^{-6}$ ) at any receptor location, if the permit unit is constructed without T-BACT;
  - (B) an increased MICR greater than ten in one million ( $1.0 \times 10^{-5}$ ) at any receptor location, if the permit unit is constructed with T-BACT;
  - (C) a cancer burden greater than 0.5.
- 2) *(d)(2) Chronic Hazard Index* - The cumulative increase in total chronic HI for any target organ system due to total emissions from the new, relocated or modified permit unit will not exceed 1.0 at any receptor location.
- 3) *(d)(3) Acute Hazard Index* - The cumulative increase in total acute HI for any target organ system due to total emissions from the new, relocated or modified permit unit will not exceed 1.0 at any receptor location.

The Tier I risk screening was based on a 0.00919 lbs TCE/hr emission and 14 other toxic compounds. The 10 ppm break through of the primary carbon vessel would result in a TCE emission that is less than that used in the Tier 1 screening. Therefore, the 10 ppm limitation would result in a toxic emission that is below the Tier 1 screening levels. Compliance with this District Rule 1401 is expected. The following are the results of the Tier 1 screening.

Cancer/Chronic ASI	Acute ASI
9.07E-01	2.76E-04
Pass	Pass

**REGULATION XXX: TITLE V**

This facility is in the RECLAIM program. The proposed project is considered as a “minor permit revision” for RECLAIM pollutants, non-RECLAIM pollutants, and hazardous air pollutants (HAPs) to the RECLAIM/Title V permit for this facility. Rule 3000(b)(12) specifies that a “minor permit revision” includes, but is not limited to any Title V permit revision that:

- Rule 3000(b)(12)(A)(v) – does not result in an emission increase of any RECLAIM pollutant over the facility’s starting Allocation plus the non-tradeable Allocation, or higher Allocation amount which has previously undergone a significant permit revision process.
- Rule 3000(b)(12)(A)(vi) – does not result in an increase in emissions of a pollutant subject to Regulation XIII – New Source Review (non-RECLAIM pollutants) or a hazardous air pollutant (HAP).

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The proposed project is not expected to result in an emission increase of any RECLAIM pollutant or an increase in emissions of a pollutant subject to Regulation XIII – New Source Review (non-RECLAIM pollutants) or a hazardous air pollutant (HAP), and therefore is considered as a “minor permit revision” pursuant to Rule 3000(b)(12)(A)(v) and Rule 3000(b)(12)(A)(vi).

This proposed project is the 9<sup>th</sup> permit revision to the Title V renewal permit issued to this facility on July 6, 2010. The following table summarizes the permit revisions since the Title V renewal permit was issued:

Revision	HAP	VOC	NOx*	PM10	SOx	CO
Previous Permit Revision Total Cumulative to date. Title V permit renewed July 6, 2010	0	4	12	0	0	9
9 <sup>th</sup> Permit Revision	0	0	0	0	0	0
Cumulative Total	0	4	12	0	0	9
Maximum Daily	30	30	40*	30	60	220

\* RECLAIM pollutant, not subject to emission accumulation requirements

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.

The proposed project will not result in an increase in NOx emissions. As a result, this proposed project is considered as a “minor permit revision” for RECLAIM pollutants.

**RECOMMENDATION:**

A Permit to Construct is recommended subject to the preceding conditions since the proposed equipment installation is expected to comply with all applicable Rules and Regulations.