

South Coast Air Quality Management District

Statement of Basis

Proposed Title V Renewal Permit

Facility Name:	Sorenson Engineering, Inc.
Facility ID:	36738
SIC Code:	3450
Equipment Location:	32032 Dunlap Boulevard Yucaipa, CA 92399
Application #(s):	553563
Application Submittal Date(s):	6/26/13
AQMD Contact Person:	Hamed Mandilawi, Senior Engineer
Phone Number:	(909) 396-3275
E-Mail Address:	hmandilawi@aqmd.gov

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 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 requested 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 EPA's 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. NO₂, SO₂, and CO are in attainment with federal standards. The status of lead is

nonattainment. 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 Sorenson Engineering, Inc., located at 32032 Dunlap Boulevard, Yucaipa, CA 92399. 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 engaged in the manufacturing of high precision electronics. The facility operates a solvent degreaser, deburring lines, a plating line, and other supporting equipment. Emission from the solvent degreaser is controlled by an air pollution control equipment carbon adsorption system, and emissions from a deburring line and the plating line are controlled by air pollution control equipment scrubbers.

3. Construction and Permitting History

The facility has been in constant operation with a Title V permit at this location. A Title V permit renewal was issued to the facility on December 30, 2008.

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 NSPS requirements. However, the facility is subject to the requirements of 40CFR63 Subpart T-National Emission Standards for Halogenated Solvent Cleaning. The requirements of this NESHAP are reflected in the Title V permit.

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); CAPCOA/CARB/EPA Region IX Periodic Monitoring Recommendations for Generally Applicable Requirements in 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).

Trichloroethylene emission from the degreasing operation is controlled by a carbon adsorption system. The degreasing operation is subject to the requirements of 40CFR63 Subpart T, which contains sufficient monitoring to satisfy the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64.

Particulate matter emissions from the several tanks within a plating line are vented to air pollution control systems scrubbers to control the PM10 emissions. However, since the pre-control potential to emit of PM10 to each scrubber is less than 70 tons per year, the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 are not applicable to the scrubbers.

Nitrogen Oxides (NOx) emissions from a deburring line are vented to air pollution control system NOx scrubber to control the NOx emissions. However, since the pre-control potential to emit of NOx to the scrubber is less than 10 tons per year, the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 is not applicable to the NOx scrubber.

6. Permit Features

Permit Shield

A permit shield is an optional part of a Title V permit that gives the facility 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 2012**

Pollutant	Emissions (tons/year)
NOx	1.478
CO	0.026
VOC	8
PM	0.016
SOx	0

**Toxic Air Contaminants Emissions (TAC)
Annual Reported Emissions for Reporting Period 2012**

The Following TACs Were Reported	Emissions (lbs/yr)
Ammonia	12
Benzene	0.085
Formaldehyde	0.025
Naphthalene	13.5
Nickel	0.018
Trichloroethylene	0.125

Health Risk from Toxic Air Contaminants

The facility is subject to review by the Air Toxics Information and Assessment Act (AB2588). The facility was determined to be exempt from the requirements of AB2588.

8. Compliance History

As noted, the facility has been in constant operation with a Title V permit and the facility has been subject to both self-reporting requirements and AQMD inspections. The facility has had no citizen complaints filed in the last two years. However, the facility was issued two Notices of Violation on 10/23/2012 and 3/1/2013 for operating various equipment contrary to permit conditions. In addition, the facility was issued a Notice to Comply on 9/18/2013 requiring the applicant to provide records to show compliance with various permit conditions. The applicant provided the requested records and was determined to be operating in compliance.

9. Compliance Certification

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