

E/M Coating Services
20751 Superior St.
Chatsworth, CA 91311
ID#: 136173

EQUIPMENT DESCRIPTION

A/N 535616 (Existing equipment w/o permit): P/O
OVEN, IR DRYING, CONVEYORIZED, THERMCRAFT INC., MODEL NO. OVC-1224120-FX, 3'-0" W. X
14'-0" L. X 5'-0" H., 15 KW ELECTRICALLY HEATED, WITH ONE 0.15 EXHAUST BLOWER AND ONE 1
HP CIRCULATION BLOWER.

A/N 535618: Title V facility permit revision, de minimis significant

CONDITIONS

1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN ACCORDANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.
[RULE 204]
2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
[RULE 204]
3. THIS EQUIPMENT SHALL BE OPERATED ONLY WITHIN THE PERMANENT TOTAL ENCLOSURE WHICH IS VENTED TO THE VOC CONTROL DEVICE. THE VOC CONTROL DEVICE SHALL BE FULLY OPERATIONAL WHILE THE EQUIPMENT IT SERVES IS IN OPERATION.
[RULE 1303 (b)(1)-BACT]
4. THIS OVEN SHALL BE USED TO ONLY CURE PARTS THAT ARE COATED IN THE CONVEYORIZED DIP TANK.
[RULE 1303 (b)(1)-BACT]

EMISSIONS AND REQUIREMENTS:

5. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS:

PM: RULE 404, SEE APPENDIX B FOR EMISSION LIMITS

BACKGROUND

E/M Coating Services submitted application no. 535616 to permit an electric drying oven. The company has been operating the oven without a permit since they were under the impression

that it was exempt from permitting. The oven is part of a conveyORIZED system consisting of the oven and a dip tank (P/O F60223). Since it is conveyORIZED, it does not fall under the Rule 219(1)(3) exemption for batch ovens. The dip tank and oven are in a permanent total enclosure which is vented to a VOC hybrid control system with minimum 95% overall control efficiency. The equipment description for the APC system will be updated when the P/O is issued under A/N 498857 to include venting of this oven. The company received one N/C (no NOV's), in the last two years, to obtain a permit for this oven.

E/M Coating Services is a Title V facility. A Title V renewal permit was issued to this facility on September 2, 2011. E/M Coating Services has proposed to revise their Title V renewal permit, under application no. 535618, by adding an electric drying oven. The proposed project is considered as a "de minimis significant permit revision" to the Title V permit for this facility. This is the first revision since the renewal.

PROCESS DESCRIPTION

E/M Coating Services finishes metal aerospace fasteners and industrial screws. Fasteners are coated with barrier coatings which offer protection against galvanic corrosion between dissimilar metals. Some coatings contain hexavalent chromium. The company operates numerous spray booths, spray machines, dip tanks, ovens and an air pollution control system consisting of HEPA exhaust filters, a zeolite concentrator and afterburner. Solid film lubricant is applied to parts in the conveyORIZED dip tank and the parts are cured in this oven. This equipment is in the PTE which vents to APC equipment. They operate under a facility-wide VOC cap of 216 lb/day.

EMISSION ESTIMATES

The oven is used to dry materials applied to fasteners using the dip tank permitted under P/O F60223. While VOC emissions may be emitted during the drying process, all VOC emissions are attributed to the dip tank (0.39 lb/day, see A/N 414261). Hence for AEIS and NSR purposes, emissions from the oven are considered zero.

RULE ANALYSIS

RULE 212 (c)(1): A public notice is not required for this project since the emission source is not located within 1,000 feet from the outer boundary of a school. The closest school to the facility (St. John Eudes School) is located about 1,300 feet away.

RULE 212 (c)(2): A public notice is not required for this project since the emission increase from this facility does not exceed any of the daily maximums as specified in Rule 212(g). There is no emission increase from the oven since the emissions are included under the existing facility VOC cap.

RULE 212(c)(3): A public notice is not required for this project since there will not be an increase in emissions of toxic air contaminants listed in Table I of Rule 1401 that will result in a cancer risk equal or greater than one in a million. Materials used in the dip tank may contain toxic air contaminants but the associated emissions are below the Tier 1 thresholds as described in the application for the dip tank. A permit condition will be added to only allow the curing of coatings applied to parts in the conveyORIZED dip tank.

RULE 212(g): The proposed project will not result in an emission increase over the thresholds in this rule. VOC after control is less than 1 lb/day.

RULES 401 & 402: AQMD database has no records of visible emissions or nuisance complaints against this facility. Compliance with these requirements is expected with the proper operation of the equipment.

Regulation XIII: The oven is in a PTE vented to an APC system for VOC with 95% overall control efficiency. This complies with BACT for this type of equipment. Modeling is not required for VOC. Offsets are not required since this equipment will operate under the existing facility VOC cap of 216 lb/day so there is no increase from the facility.

RULE 1401: Health risk is below the thresholds, see evaluation for the dip tank that this oven serves. Emissions are below Tier 1 levels. A condition will be imposed to only allow the curing of coatings applied to parts coated in the conveyORIZED dip tank.

REGULATION XXX:

This facility is not in the RECLAIM program. The proposed project is considered as a “de minimis significant permit revision” to the Title V permit for this facility.

Rule 3000(b)(7) 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 following emission threshold levels:

Air Contaminant	Daily Maximum (lbs/day)
HAP	30
VOC	30
NOx	40
PM10	30
SOx	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 1st permit revision to the Title V renewal permit issued to this facility on September 2, 2011. The following table summarizes the cumulative emission increases resulting from all permit revisions since the Title V renewal permit was issued:

Revision	HAP	VOC	NOx	PM₁₀	SOx	CO
1 st Permit Revision: Add curing oven	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 minimis significant permit revision”.

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”, 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 permit will be issued to this facility.