



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

April 20, 2011
via electronic submittal

Mr. Gerard Rios
USEPA Region IX, Mail Stop AIR-3
75 Hawthorne Street
San Francisco, CA 94105

SUBJECT: De Minimus Significant Permit Revision to Title V Facility Permit
Lunday-Thagard Co.
SCAQMD Facility ID: 800080
9302 Garfield Avenue
South Gate, CA 90280

Dear Mr. Rios:

The South Coast Air Quality Management District (AQMD) has received and reviewed Title V applications for a De Minimus Significant Permit Revision to the Lunday-Thagard Co. (LTR) Facility Permit. This Title V permit revision meets all the requirements of a De Minimus Significant Permit Revision as defined in Rule 3000(b)(7). LTR is proposing to increase throughputs on several tanks, connect an additional tank to vapor recovery, and route all tanks connected to vapor recovery through a sulfur treatment system to comply with NSPS Subpart J. Additionally, some conditions have also been changed to reflect changes in monitoring at the facility. The applications are listed in the tables below:

A. Storage Tanks

	A/N	Device ID	Permit Action	Section	Process	System
1	426411	D46	Reword Condition K67.6, connect to C239/C240	H	5	1
2	426413	D48	Reword Condition K67.6, connect to C239/C240	H	5	1
3	426421	D68	Reword Condition K67.6, connect to C239/C240	H	5	1
4	493998	D45	Change throughput, reword Condition K67.6, connect to C239/C240	H	5	1
5	493999	D47	Change throughput, reword Condition K67.6, connect to C239/C240	H	5	1
6	494000	D49	Change throughput, reword Condition K67.6, connect to C239/C240	H	5	1
7	494001	D50	Change throughput, reword Condition K67.6, connect to C239/C240	H	5	1
8	494002	D51	Change throughput, reword Condition K67.6, connect to C239/C240	H	5	1
9	494003	D52	Change throughput, reword Condition K67.6, connect to C239/C240	H	5	1

10	494004	D74	Change throughput, reword Condition K67.6, connect to C239/C240	H	5	1
11	498827	D35	Add throughput condition, connect to C97 and C329/C240, add mixer	H	5	1

B. Tank Vent Line Sulfur Removal System

	A/N	Device ID	Permit Action	Section	Process	System
1	497330	C239, C240	Permit to Construct final system, with connections to 11 storage tanks and Incinerator C97 – installed to comply with NSPS Subpart J	H	2	2

C. Incinerator

	A/N	Device ID	Permit Action	Section	Process	System
1	475007/ 500301	C97	Removed now irrelevant permit conditions, added permit conditions for recently approved NSPS Subpart J monitoring, modify to allow venting of C239/C240 and tank D35	H	9	1

The AQMD is required under Rule 3003(j) to provide a copy of the proposed permit to the EPA administrator for a 45-day review. As such, a copy of the proposed revision to the existing Title V permit is attached along with our evaluation reports for your review. Please note that evaluation reports may contain potential confidential information. As agreed with your staff, we are submitting the required documents to the email address R9AirPermits_SC@epa.gov.

If you have any questions or wish to provide comments regarding this proposed permit, please contact Ms. Jessica Nielsen at (909) 396-3627 or jnielsen@aqmd.gov.

Sincerely,



Jay Chen, P.E.
Senior Manager
Refinery & Waste Management Permitting
Engineering and Compliance

JC:PP:jn

Enclosures: Proposed Title V Permit, Section H
Evaluation for Storage Tanks, Sulfur Treatment System, Incinerator

cc: Marcus Ruscio, Lunday-Thagard Co. (w/o enclosures)