

FACILITY PERMIT TO OPERATE STEELSCAPE, INC

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 4: SHEET METAL COIL PROCESSING LINE					
System 1: SHEET METAL COIL PRETREATMENT					
MIXER, SODIUM HYDROXIDE, WIDTH: 4 FT 8 IN; HEIGHT: 6 FT 11 IN; LENGTH: 5 FT 4 IN A/N:	D6				
CLEANER, ALKALINE, SPRAY CLEANING STATION #1 A/N:	D9				
CLEANER, ALKALINE, SPRAY CLEANING STATION #2 A/N:	D10				
CLEANER, ALKALINE, SPRAY CLEANING STATION #3 A/N:	D11				
COATER, CHROMATE CONVERSION COATING A/N:	D12				E71.1
OVEN, DRYING, NATURAL GAS, 3.5 MMBTU/HR A/N:	D13		NOX: PROCESS UNIT**	CO: 2000 PPMV NATURAL GAS (5) [RULE 407, 4-2-1982]; NOX: 130 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 5-6-2005]; PM: (9) [RULE 404, 2-7-1986]; PM: 0.1 GRAINS/SCF NATURAL GAS (5) [RULE 409, 8-7-1981]	D323.1
System 2: SHEET METAL COIL COATING					S2.1

* (1) (1A) (1B) Denotes RECLAIM emission factor
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit
 (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit
 (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits
 (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

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Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 4: SHEET METAL COIL PROCESSING LINE					
COATER, ROLL, PRIMER A/N:	D7	C57		VOC: (9) [RULE 1125, 1-13-1995; RULE 1125, 3-7-2008; RULE 1171, 11-7-2003; RULE 1171, 5-1-2009]; VOC: 0.14 KG/L OF COATING SOLIDS APPLIED (8) [40CFR 60 Subpart TT, 10-4-1991]	H23.1, H116.1
COATER, ROLL, FINISH, GFG, MODEL 10.5S3(RT)/S2(AR) 13, 60 INCH SHEET WIDTH A/N:	D59	C57		VOC: (9) [RULE 1125, 1-13-1995; RULE 1125, 3-7-2008; RULE 1171, 11-7-2003; RULE 1171, 5-1-2009]; VOC: 0.14 KG/L OF COATING SOLIDS APPLIED (8) [40CFR 60 Subpart TT, 10-4-1991]	H23.1, H116.1
OVEN, DRYING, PRIMER, NATURAL GAS, FOUR 3.75 MMBTU/HR ZONE INCINERATORS, 15 MMBTU/HR A/N:	D14	C57	NOX: LARGE SOURCE**	CO: 2000 PPMV NATURAL GAS (5) [RULE 407, 4-2-1982]; PM: 0.1 GRAINS/SCF NATURAL GAS (5) [RULE 409, 8-7-1981]	D12.7, H116.1
OVEN, DRYING, FINISH, NATURAL GAS, THREE 3.75 MM BTU/HR AND TWO 3.5 MM BTU/HR ZONE INCINERATORS, 18.25 MMBTU/HR A/N:	D15	C57	NOX: LARGE SOURCE**	CO: 2000 PPMV NATURAL GAS (5) [RULE 407, 4-2-1982]; PM: 0.1 GRAINS/SCF NATURAL GAS (5) [RULE 409, 8-7-1981]	D12.7, H116.1

* (1) (1A) (1B) Denotes RECLAIM emission factor
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit
 (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit
 (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits
 (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

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Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 4: SHEET METAL COIL PROCESSING LINE					
AFTERBURNER, ADWEST RETOX 28.0 RTO95, WITH 323 GAL/HR WATER SPRAYED COOLING SYSTEM, NATURAL GAS, REGENERATIVE, DUAL CERAMIC HEAT EXCHANGER MEDIA, 7.862 MMBTU/HR WITH A/N: BOILER, WASTE HEAT, SUPERIOR, MODEL 5-WH-2506-F-150M, WITH ONE 30-HP ELECTRIC FAN BLOWER	C57	D7 D14 D15 D59	NOX: PROCESS UNIT**	CO: 2000 PPMV NATURAL GAS (5) [RULE 407, 4-2-1982]; NOX: 29 PPMV NATURAL GAS (3) [RULE 2012, 5-6-2005]; PM: (9) [RULE 404, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]	A72.1, A72.2, A416.1, D12.7, D29.1, D29.2, E193.1, E193.2, H116.1, K67.5
System 3: STORAGE TANK					
STORAGE TANK, CHROMIC ACID SOLUTION A/N:	D23				E71.1
STORAGE TANK, CHROMIC ACID SOLUTION A/N:	D24				E71.1
STORAGE TANK, HEATED, ALKALINE CLEANING SOLUTION A/N:	D25				
STORAGE TANK, HEATED, ALKALINE CLEANING SOLUTION A/N:	D26				
STORAGE TANK, HEATED, ALKALINE CLEANING SOLUTION A/N:	D27				

* (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE STEELSCAPE, INC

SECTION H: DEVICE ID INDEX

**The following sub-section provides an index
to the devices that make up the facility
description sorted by device ID.**

FACILITY PERMIT TO OPERATE STEELSCAPE, INC

SECTION H: DEVICE ID INDEX

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SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

FACILITY CONDITIONS

F2.1 The operator shall limit emissions from this facility as follows:

CONTAMINANT	EMISSIONS LIMIT
Single Volatile Hazardous Air Pollutant (VHAP)	Less than 10 TONS IN ANY 12-MONTH PERIOD
Combination of Volatile Hazardous Air Pollutants (VHAPs)	Less than 25 TONS IN ANY 12-MONTH PERIOD

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SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

To maintain exemption from the requirements of 40 CFR 63, Subpart SSSS, the operator shall comply with the Volatile Hazardous Air Pollutant (VHAP) emission limits of this condition. To ensure compliance with the VHAP emission limits of this condition, the operator shall:

(a) In addition to the recordkeeping requirements of Rule 109, keep adequate records for this facility to verify the monthly VHAP emissions in pounds and the VHAP content of each material as applied (including water and exempt compounds). The records shall be prepared in a format which is acceptable to the District.

(b) Within 14 calendar days after the end of each month, total and record VHAP emissions for the month and for the previous 12 month period from all equipment and operations that are required to have written permits or exempt from written permits pursuant to Rule 219. The record shall include any procedures used to account for control device efficiencies and/or waste disposal. It shall be signed and certified for accuracy by the highest ranking individual responsible for compliance with District rules.

(c) Maintain a single list which includes only the name and address of each person from whom the facility acquired VHAP-containing material regulated by the District that was used or stored at the facility during the preceding 12 months.

(d) Retain all purchase invoices for all VHAP-containing material used or stored at the facility, and all waste manifests for all waste VHAP-containing material removed from the facility.

(e) Retain all records required by this permit at the facility for five years, and make all records available to any District representative upon request.

[40CFR 63 Subpart SSSS, 6-10-2002]

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The operator shall comply with the terms and conditions set forth below:

F9.1 Except for open abrasive blasting operations, the operator shall not discharge into the atmosphere from any single source of emissions whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is:

(a) As dark or darker in shade as that designated No.1 on the Ringelmann Chart, as published by the United States Bureau of Mines; or

(b) Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subparagraph (a) of this condition.

[RULE 401, 3-2-1984; RULE 401, 11-9-2001]

F14.1 The operator shall not use fuel oil containing sulfur compounds in excess of 0.05 percent by weight.

[RULE 431.2, 5-4-1990; RULE 431.2, 9-15-2000]

F14.2 The operator shall not purchase diesel fuel containing sulfur compounds in excess of 15 ppm by weight as supplied by the supplier.

This condition shall become effective on or after June 1, 2004.

[RULE 431.2, 9-15-2000]

F16.1 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

Records shall be kept to demonstrate compliance with the following conditions, pursuant to Rule 1407 Compliance Plan for this facility:

(1) Steelscape, Inc. shall only melt clean aluminum scrap, rerun scrap, or other metal and alloy which are shown by laboratory analysis to have less than 0.004 percent of Cadmium and less than 0.002 percent of Arsenic by weight.

(2) All records required by Rule 1407(g)(2) shall be kept for at least five years and made available to the District personnel upon request. The records shall include compliance plan application number and data required by Rule 1407(g)(2).

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The operator shall comply with the terms and conditions set forth below:

[RULE 1407, 7-8-1994]

F24.1 Accidental release prevention requirements of Section 112(r)(7):

a). The operator shall comply with the accidental release prevention requirements pursuant to 40 CFR Part 68 and shall submit to the Executive Officer, as a part of an annual compliance certification, a statement that certifies compliance with all of the requirements of 40 CFR Part 68, including the registration and submission of a risk management plan (RMP).

b). The operator shall submit any additional relevant information requested by the Executive Officer or designated agency.

[40CFR 68 - Accidental Release Prevention, 5-24-1996]

SYSTEM CONDITIONS

S2.1 The operator shall limit emissions from this system as follows

CONTAMINANT	EMISSIONS LIMIT
VOC	Less than or equal to 339 LBS IN ANY ONE DAY

[RULE 1303(b)(2)-Offset, 5-10-1996]

[Systems subject to this condition : Process 4, System 2]

S2.2 The operator shall limit emissions from this system as follows

CONTAMINANT	EMISSIONS LIMIT
VOC	Less than or equal to 705 LBS IN ANY ONE DAY

[RULE 1303(b)(2)-Offset, 5-10-1996]

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The operator shall comply with the terms and conditions set forth below:

[Systems subject to this condition : Process 6, System 4]

DEVICE CONDITIONS

A. Emission Limits

A72.1 The operator shall maintain this equipment to achieve a minimum destruction efficiency of 95 percent for VOC during the normal operation of the equipment it vents.

[**RULE 1303(a)(1)-BACT, 5-10-1996**; **RULE 1303(a)(1)-BACT, 12-6-2002**; **RULE 1303(b)(2)-Offset, 5-10-1996**; **RULE 1303(b)(2)-Offset, 12-6-2002**]

[Devices subject to this condition : C57]

A72.2 The operator shall maintain this equipment to achieve a minimum overall control efficiency of 95 percent for VOC during the normal operation of the equipment it vents.

[**RULE 1303(a)(1)-BACT, 5-10-1996**; **RULE 1303(a)(1)-BACT, 12-6-2002**; **RULE 1303(b)(2)-Offset, 5-10-1996**; **RULE 1303(b)(2)-Offset, 12-6-2002**]

[Devices subject to this condition : C57]

A416.1 Notwithstanding Section E administrative condition No. 7b, for compliance with NO_x emission limit of 29 ppmv, NO_x emissions from this device shall not be corrected for oxygen and shall be at actual stack conditions.

[**RULE 2012, 5-6-2005**]

[Devices subject to this condition : C57]

D. Monitoring/Testing Requirements

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The operator shall comply with the terms and conditions set forth below:

D12.7 The operator shall install and maintain a(n) stack flow monitor to accurately indicate the flue gas flow from the oxidizer stack to provide continuous and cumulative actual flow rate from the ovens and afterburner. Such flow monitor shall be maintained and calibrated in accordance with the system maintenance procedures and schedules specified on the latest flow monitor's QA/QC plan that is approved by the District.

NOx emissions from the afterburner shall be calculated using the NOx RECLAIM concentration limit of 29 ppmv and the stack flow rate at stack conditions (no correction for oxygen) by using Rule 2012 Appendix A, Chapter 4, equation 28c.

The NOx emissions calculated for the afterburner under Device No. C57 have already included the NOx emissions from the ovens under D7, D8, D14 & D15. The operator is not required to calculate the individual NOx emissions from each oven.

When valid exhaust flow rate of an afterburner is not obtained from the stack flow monitor, substituted data for the exhaust flow rate for the afterburner shall be determined by using procedures in the certification letter for the continuous exhaust flow monitor and the missing data procedures applicable to flow as set forth in Rule 2012 Appendix A, Chapter 3, Section K (2).

[RULE 2012, 5-6-2005]

[Devices subject to this condition : D14, D15, C57]

D29.1 The operator shall conduct source test(s) for the pollutant(s) identified below.

Pollutant(s) to be tested	Required Test Method(s)	Averaging Time	Test Location
VOC	Approved District method	District-approved averaging time	Simultaneous inlet and outlet
NOX emissions	Approved District method	District-approved averaging time	Outlet
CO emissions	Approved District method	District-approved averaging time	Outlet

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The operator shall comply with the terms and conditions set forth below:

The source tests shall be conducted while the oxidizer is operating at a temperature of not less than the minimum operating temperature specified in this permit. If the operating temperature during the source tests is greater than the minimum operating temperature specified in this permit, the minimum operating temperature may be increased to reflect the operating temperature during the source tests.

The test(s) of VOC and CO emissions shall be conducted at least once during the life of the permit.

The test(s) shall be conducted no later than May 5, 2016 unless otherwise approved in writing by the District

The test(s) of NO_x emissions shall be conducted to determine the actual NO_x concentration at the stack level and to validate the certification for the continuous exhaust flow monitor as set forth in Rule 2012(j).

The test(s) of VOC emissions shall be conducted to demonstrate compliance with a minimum overall VOC control efficiency of 95 percent during the normal operation of the equipment it vents.

A source test protocol shall be submitted to the District (addressed to South Coast Air Quality Management District, PO Box 4941, Diamond Bar, CA 91765) and shall be approved in writing by the District before the test commences.

The test protocol shall include the completed District Forms ST-1 and ST-2 specifying the proposed operating conditions of the equipment during the test, the identity of the testing laboratory, a statement from the testing laboratory certifying it meets the criteria in District Rule 304(k), and a description of the sampling and analytical procedures to be used.

A written notice of the source test(s) shall be submitted to the District (addressed to South Coast Air Quality Management District, PO Box 4941, Diamond Bar, CA 91765) at least 14 days prior to source testing date so that an observer from the District may be present.

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The operator shall comply with the terms and conditions set forth below:

Two complete copies of the source test reports shall be submitted to the District (addressed to South Coast Air Quality Management District, PO Box 4941, Diamond Bar, CA 91765) within 45 days after the source testing date. The source test report shall include, but not limited to all testing data required by this condition.

The results of all tests (including preliminary tests) that are conducted on this equipment for informational purposes shall be submitted to the District (addressed to South Coast Air Quality Management District, PO Box 4941, Diamond Bar, CA 91765) within 45 days after the testing date.

A testing laboratory certified by the California Air Resources Board in the required test methods for criteria pollutants to be measured, and in compliance with the District Rule 304 (no conflict of interest) shall conduct the test.

Sampling facilities shall comply with the District guidelines for construction of sampling and testing facilities, pursuant to Rule 217.

The source test reports of VOC emissions shall consist of, but may not be limited to: VOC in ppmv and pounds per hour, VOC destruction and collection efficiencies, usage of all VOC-containing materials during the test, oxygen content, moisture content, flow rate, and temperature.

The source test reports of NO_x and CO emissions shall include, but not limited to: emission data expressed in terms of ppmv at stack condition and corrected to 3 percent oxygen (dry basis, for CO only), in lbs/hr, and in lbs/MM cubic feet, all exhaust flow rate expressed in terms of dry standard cubic feet per minute (DSCFM) and dry actual cubic feet per minute (DACFM), all moisture concentration expressed in terms of percent corrected to 3 percent oxygen.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(b)(2)-Offset, 5-10-1996; RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : C57]

D29.2 The operator shall conduct source test(s) for the pollutant(s) identified below.

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The operator shall comply with the terms and conditions set forth below:

Pollutant(s) to be tested	Required Test Method(s)	Averaging Time	Test Location
VOC	Approved District method	District-approved averaging time	Inlet

The test shall be conducted to certify the coating rooms satisfy the requirements for a Permanent Total Enclosure.

The test shall be conducted within 180 days after the installation of D59.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; 40CFR 60 Subpart TT, 10-4-1991]

[Devices subject to this condition : C57]

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The operator shall comply with the terms and conditions set forth below:

D323.1 The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on an annual basis, at least, unless the equipment did not operate during the entire annual period. The routine annual inspection shall be conducted while the equipment is in operation and during daylight hours.

If any visible emissions (not including condensed water vapor) are detected that last more than three minutes in any one hour, the operator shall verify and certify within 24 hours that the equipment causing the emission and any associated air pollution control equipment are operating normally according to their design and standard procedures and under the same conditions under which compliance was achieved in the past, and either:

- 1). Take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit; or
- 2). Have a CARB-certified smoke reader determine compliance with the opacity standard, using EPA Method 9 or the procedures in the CARB manual "Visible Emission Evaluation", within three business days and report any deviations to AQMD.

The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

- 1). Stack or emission point identification;
- 2). Description of any corrective actions taken to abate visible emissions;
- 3). Date and time visible emission was abated; and
- 4). All visible emission observation records by operator or a certified smoke reader.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

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The operator shall comply with the terms and conditions set forth below:

[Devices subject to this condition : D13]

E. Equipment Operation/Construction Requirements

E71.1 The operator shall not use this equipment if it is heated or air sparged.

[**RULE 1303(a)(1)-BACT, 5-10-1996**]

[Devices subject to this condition : D12, D23, D24]

E193.1 The operator shall construct this equipment according to the following requirements:

This permit shall expire if the construction of this equipment is not completed by 7-31-2008 unless an extension of time has been approved in writing by a District representative.

The operator shall notify a District representative when construction has been completed.

[**RULE 202, 5-7-1976; RULE 205, 1-5-1990**]

[Devices subject to this condition : C57]

E193.2 The operator shall operate and maintain this equipment according to the following requirements:

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The operator shall comply with the terms and conditions set forth below:

The combustion chamber temperature shall be maintained at a minimum of 1,600 degrees Fahrenheit whenever the equipment it serves is in operation.

The operator shall operate and maintain a temperature measuring and recording system to continuously measure and record the combustion chamber temperature pursuant to the operation and maintenance requirements specified in 40 CFR Part 64.7. Such system shall have an accuracy of within 1% of the temperature being monitored and shall be inspected, maintained, and calibrated on an annual basis in accordance with the manufacturer's specifications.

For the purpose of this condition, a deviation shall be defined as when the combustion chamber temperature of less than 1,600 degrees Fahrenheit occurs during the normal operation of the equipment it serves. The operator shall review the records of the combustion chamber temperature on a daily basis to determine if a deviation occurs or shall install an alarm system to alert the operator when a deviation occurs.

Whenever a deviation occurs, the operator shall inspect this equipment to identify the cause of such a deviation, take immediate corrective actions to maintain the combustion chamber temperature at or above 1,600 degrees Fahrenheit, and keep records of the duration and cause (including unknown cause, if applicable) of the deviation and the corrective actions taken.

All deviations shall be reported to the AQMD pursuant to the requirements specified in 40 CFR Part 64.9 and Condition Nos. 22 and 23 in Section K of this permit. The report shall include the total operating time of this equipment and the total accumulated duration of all deviations for each semi-annual reporting period specified in Condition No. 23 in Section K of this permit.

The operator shall submit an application with an Quality Improvement Plan (QIP) in accordance with 40 CFR Part 64.8 to the AQMD if an accumulation of deviations exceeds 5 percent duration of this equipment's total operating time for any semi-annual reporting period specified in Condition No. 23 in Section K of this permit. The required QIP shall be submitted to the AQMD within 90 calendar days after the due date for the semi-annual monitoring report.

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The operator shall comply with the terms and conditions set forth below:

The operator shall inspect and maintain all components of this equipment on an annual basis in accordance with the manufacturer's specifications.

The operator shall keep adequate records in a format that is acceptable to the AQMD to demonstrate compliance with all applicable requirements specified in this condition and 40 CFR Part 64.9 for a minimum of five years.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997; 40CFR Part 64, 10-22-1997]

[Devices subject to this condition : C57]

H. Applicable Rules

H23.1 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	109

[RULE 109, 5-2-2003]

[Devices subject to this condition : D7, D59]

H116.1 The operator shall maintain the equipment as Permanent Total Enclosure (PTEs) in order to comply with the requirement of EPA Method 204 whenever the equipment is in operation.

[RULE 1303(a)(1)-BACT, 5-10-1996]

[Devices subject to this condition : D7, D14, D15, C57, D59]

K. Record Keeping/Reporting

K67.5 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

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The operator shall comply with the terms and conditions set forth below:

All records of the stack flow data shall be maintained in a manner as described in the latest flow monitor's QA/QC plan that is approved by the District. The operator shall keep a copy of the latest approved QA/QC plan and a copy of the District approved letter for such plan on site.

The operator shall maintain all records that are necessary to demonstrate compliance with all applicable requirements specified in Rule 2012. All records required by this permit shall be kept in a format which is acceptable to the District, maintain on site for a minimum of five years and made them available to any District representative upon request.

[RULE 2012, 5-6-2005]

[Devices subject to this condition : C57]