



SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

ENGINEERING AND COMPLIANCE OFFICE

APPLICATION PROCESSING AND CALCULATIONS

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Minor Title V/RECLAIM Permit Revision  
Roller Coater, Drying Oven, Oxidizer

Legal Owner  
or Operator: IMPRESS USA INC  
836 BARRANCUDA STREET  
TERMINAL ISLAND, CA 90731

ID: 124619

Equipment  
Location: 836 BARRACUDA ST, TERMINAL ISLAND, CA 90731

Equipment Description:  
A/N 492620 FACILITY PERMIT REVISION

**EQUIPMENT DESCRIPTION:**

Equipment	ID No	Connected To	Source Type/ Monitoring Unit	Emissions	Conditions
<b>Process 1: COATING OPERATIONS</b>					
<b>System 3: ROLL COATING LINE 3</b>					
COATER, ROLL, LINE NO. 3, WAGNER  A/N <del>450261</del> 492621	D27	C29		[VOC]: RULE 125,1-13-1995;RULE 1171,11-7-2003;RULE 1171,5-6-2005	<b>A63.1</b> , B59.4, H23.4, K67.1
OVEN, NO. 3, LTG METAL DECORATING, HEAT SUPPLIED FROM AFTERBURNER NO. 3  A/N <del>450262</del> 492622	D28	C29			<b>A63.1</b> , H23.4
AFTERBURNER, NO. 3, Natural Gas, LTG METAL DECORATING, 6 MMBTU/HR  A/N <del>450263</del> 492623	C29	D27, D28	NOX: Process Unit	[CO]: 2000 PPMV NATURAL GAS RULE 407,4-2-1982 [NOX]: 130 LBS/MMSCF NATURAL GAS RULE 2012,12-5-2003;RULE 2012,1-7-2005 [PM]: RULE 404,2-7-1986 [PM]: 0.1 GRAINS/SCF RULE 409,8-7-1981	<b>A63.1</b> , A72.1, <b>A72.2</b> , C1.2, D12.1, <b>D29.1</b> , <b>D182.1</b> , E193.2, K67.1

Background

The company is a Title V and RECLAIM facility. The Title V renewal permit was issued to this facility on 5/9/2005. In this project, for greater operational flexibility, the company is proposing to convert condition A63.1 applicable to the No.3 roll coating line



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(consisting of roll coater D27, drying oven D28, and oxidizer C29) from a daily limit of 308 pounds to a monthly limit of 9,240 pounds of VOC.

There will be no VOC emission increases as a result of this project. Therefore, this project is considered a minor permit revision to the Title V renewal permit.

The facility has been in constant operation with a Title V permit since 2000. The facility has been subject to both self-reporting requirements and AQMD inspections. The facility has had no citizen complaints filed, Notices to Comply or Notices of Violation issued in the last two years. The facility is currently operating in compliance with all applicable rules and regulations.

### Process Description

This facility manufactures two-piece steel cans used for storing tuna in making pet food products. Production steps are sheet metal stamping, forming, coating and adhesive application.

In the No. 3 roll coating line, pre-cut sheets are automatically fed to the coating line via a belt conveyor, are coated inside the D27 roll coater, and are then dried inside the D28 oven. VOC emissions from D27 and D28 are vented to the C29 oxidizer.

### BACT Evaluation

The conversion from a daily limit to a monthly VOC limit could potentially result in daily VOC emissions increase. Therefore, current BACT requirements apply.

The current BACT for controlling VOC emissions from a roll coating line is an APC system with a minimum 90% overall control efficiency. The existing conditions, A72.1 and A72.2, require 95% destruction and 90% collection efficiencies respectively. Therefore, the A72.2 condition will be revised to require a 90% overall control efficiency for the C29 oxidizer. Also, the applicant will be required to retest the equipment to demonstrate compliance with the overall efficiency requirement.



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Emission Offset Evaluation

This proposed change of permit condition from daily to a monthly VOC limit will not result in any emission increase. Therefore, external emission offset will not be required. The following is a summary of NSR data entry for this project:

New A/N	Previous A/N	Device No.	NSR Entry (lbs/day, 30 day AVG)			
			VOC	NOx	PM <sub>10</sub>	CO
492621	450261	D27	0	-	-	-
492622	450262	D28	0	-	-	-
492623	450263	C29	1	5	1	5

The above data has been transferred from previous applications, without any changes.

Toxic Evaluation

Converting daily to monthly emission limits will result in no changes in toxic emissions. Since MICRs are based on annual emissions, this proposed change of permit conditions will not result in any changes in MICRs.

The attached Excel worksheet calculates the hourly controlled TAC emissions. The worksheet also calculates MICRs, HIAs and HICs. The calculated MICRs are less than 1E-6 for both types of receptors. The calculated HIAs and HICs are less than 1.0 for all target organs. Therefore, this project is expected to be in compliance with Rule 1401.

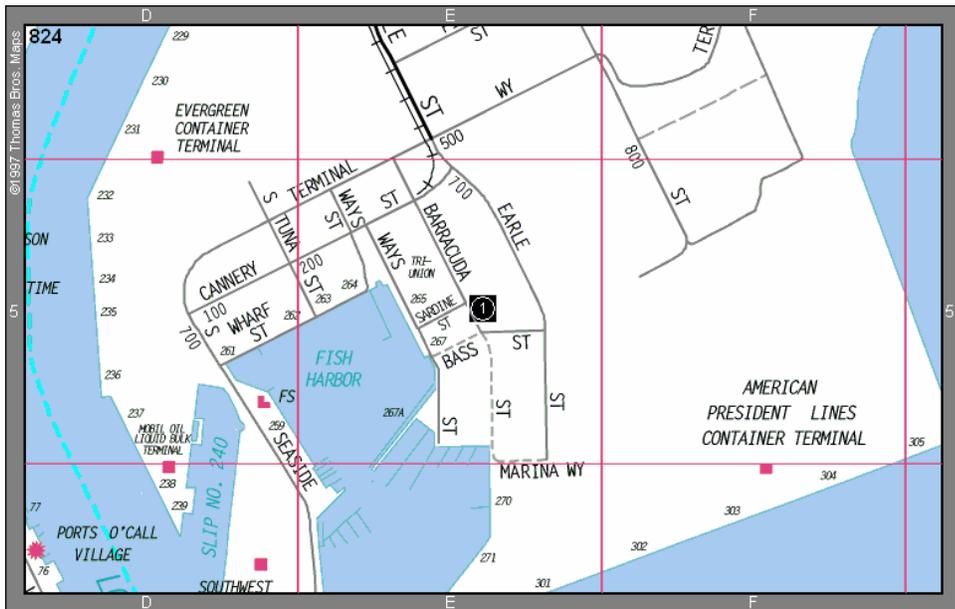


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### Rule Evaluation

Rule 212(c)(1):

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



Since no school is located within 1,000 ft, a public notice will not be required.

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).

	Controlled Emissions (lb/dy)					
	ROG	NO <sub>x</sub>	PM <sub>10</sub>	SO <sub>2</sub>	CO	Pb
Total Emission Increase	0	0	0	0	0	0
MAX Limit	30	40	30	60	220	3
Compliance Status	Yes	Yes	Yes	Yes	Yes	yes

The above table summarizes the emission limits and increases. Since emission increases are less than the limits, a public notice will not be required.

Rule 212(c)(3):

The proposed project will not result in TAC emission increases. Furthermore, MICRs, HIAs & HICs are less than 1E-6, 1 & 1 respectively. Therefore, a public notice will not be required.



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

	<i>Controlled Emissions (lb/dy)</i>					
	<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>
<i>Total Emission Increase</i>	0	0	0	0	0	0
<i>MAX Limit</i>	30	40	30	60	220	3
<i>Compliance Status</i>	Yes	Yes	Yes	Yes	Yes	yes

The above table summarizes the emission limits and increases. Since emission increases are less than the limits, a public notice will not be required.

Rule 401: Visible emissions are not expected with the proper operation of the equipment.

Rule 402: Nuisance is not expected with the proper operation of the equipment.

Rule 1125 & 1171: The proposed project will not result in changes in throughput or the addition of any new VOC-containing materials used in this roller coater. The company will continue to use the same VOC-containing materials. VOC emissions from this roll coating operations are controlled by the C29 oxidizer.

Rule 1303(a): The applicant has agreed to comply with the proposed A72.2 condition, which requires the overall VOC control efficiency of the APC to be at least 90%. Therefore, this project is considered BACT.

Rule 1303(b)(1): The proposed change of condition will nor result in any criteria pollutants emission increase. Therefore, the modeling requirements of this rule are not applicable.

Rule 1303(b)(2): The following summarizes the estimated emission increases from this project:



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	Controlled Emissions (30 Day Average, lb/day)				
	ROG	NO <sub>x</sub>	PM <sub>10</sub>	SO <sub>2</sub>	CO
Total Emission Increase	0	0	0	0	0

Thus, there is no offset needed for this project.

Rule 1401:

The proposed change of permit condition will not result in any toxic emissions increase. Furthermore, the attached worksheets show that the project meets Tier II screening, with MICRs, HIAs & HICs, less than 1E-6, 1.0 & 1.0 respectively. Therefore, this project is expected to comply with this rule.

Regulation XXX Evaluation

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).

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 3<sup>rd</sup> permit revision to the Title V renewal permit issued to this facility on May 9, 2005. The following table summarizes the permit revisions since the Title V renewal permit was issued:



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Revision	HAP	VOC	NOx	PM <sub>10</sub>	SOx	CO
Previous two revisions	0	0	0	0	0	0
3 <sup>rd</sup> Permit Revision; change of condition (D27, D28, C29) daily to monthly	0	0	0	0	0	0
Cumulative Total	0	0	0	0	0	0
Maximum Daily	30	30	40	30	60	220

Recommendation

The proposed project is expected to comply with all applicable District Rules and Regulations. Since the proposed project is considered as a "minor 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.

**A63.1** The operator shall limit emissions from this equipment as follows:

CONTAMINANT	EMISSIONS LIMIT
VOC	Less than or equal to <del>308 LBS IN ANY ONE DAY</del> <u>9240 LBS IN ANY ONE MONTH</u>

For the purposes of this condition, the limit(s) shall be based on the total combined emissions from D27, D28, and C29.

To ensure compliance with the monthly Volatile Organic Compound (VOC) emission limit(s) of this condition, the operator shall comply with the following recordkeeping requirements:

- (1) The operator shall comply with Rule 109 (Recordkeeping for Volatile Organic Compound Emissions).
- (2) Within 14 calendar days after the end of each month, the operator shall total and record VOC emissions for the month from all equipment and operations covered by the monthly emission limit(s). 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.
- (3) The operator shall maintain a single list which includes only the name and address of each person from whom the facility acquired VOC-containing



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material regulated by the District that was used or stored at the facility during the preceding 12 months.

(4) The operator shall retain all purchase invoices for all VOC-containing material used or stored at the facility, and all waste manifests for all waste VOC-containing material removed from the facility, for five years.

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.

A72.2 The operator shall maintain this equipment to achieve a minimum collection overall control efficiency of 90 percent for VOC during the normal operation of the equipment it vents.

B59.4 The operator shall not use the following material(s) in this device materials containing any toxic air contaminants listed in Table 1 of Rule 1401, with effective date of May 2, 2003 or earlier, except ethyl benzene (CAS 100-41-4), ethylene glycol butyl ether (CAS 11-76-2), formaldehyde (CAS 50-00-0), isophorone (CAS 78-59-1), methyl ethyl ketone (CAS 78-93-3), toluene (CAS 108-88-3) and xylenes (CAS 1330-20-7).

C1.2 The operator shall limit the exhaust flow to no more than 7060 cubic feet per minute.

For the purpose of this condition, exhaust flow shall be defined as maximum process flow to this equipment.

D12.1 The operator shall install and maintain a(n) flow meter to accurately indicate the flow rate being supplied to the afterburner in standard cubic feet.

D29. 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 EMISSIONS AND OUTLET	APPROVED DISTRICT METHOD	DISTRICT-APPROVED AVERAGING TIME	SIMULTANEOUS INLET

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) shall be conducted no later than 180 days after the issuance of this permit to construct unless otherwise approved in writing by the District

The test(s) for VOC emissions shall be conducted to demonstrate compliance with a minimum overall VOC control efficiency of 90 percent during the normal operation of the equipment it vents

A source test protocol shall be submitted to the District 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



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sampling and analytical procedures to be used

A written notice of the source test(s) shall be submitted to the District at least 14 days prior to source testing date so that an observer from the District may be present

Two complete copies of the source test reports shall be submitted to the District 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 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, the number and type of equipment operated during the test, amount and type of solvent used, oxygen content, moisture content, temperature, and exhaust flow rate expressed in terms of dry standard cubic feet per minute (DSCFM) and dry actual cubic feet per minute (DACFM), and natural gas usage

**D182.1** The operator shall conduct a source test in accordance with the following specifications:

- A. The test shall be conducted at least once during the life of the permit.
- B. The test shall be conducted no later than 5/8/2010.
- C. The test shall be conducted to determine the voc emissions using an approved district method to demonstrate compliance with all applicable permit condition(s), rules and regulations.
- D. The source test 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 test is greater than the minimum operating temperature specified in this permit, the minimum operating temperature specified in this permit may be increased to reflect the operating temperature during the source test.
- E. The operator shall comply with administrative conditions nos. 8, 9, and 10 of section E of this facility permit.
- F. The operator shall submit two complete copies of the source test report specified in condition no. 9 of section E of this facility permit to the District Engineering and Compliance Division. The engineering copy of the report shall be sent to: South Coast Air Quality Management District, Coating, Printing and Aerospace Operations, attn: Air Quality and Compliance Supervisor, 21865 Copley Drive, Diamond Bar, CA 91765. the compliance copy of the report shall be sent to: South Coast Air Quality Management District, p.o. box 4941, Diamond Bar, CA 91765

~~The tests shall be conducted to determine the ROG emissions at the inlet and outlet simultaneously.~~



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~~The tests shall be conducted to determine the ROC emissions using District method 25.1 measured over a 60 minute averaging time period.~~

~~Two source tests shall be conducted to demonstrate compliance with Rule 1125. The first test shall be conducted by 5/7/2006 and the second test shall be conducted by 5/8/2010.~~

**E193.2** The operator shall operate and maintain this equipment according to the following requirements:  
The combustion chamber temperature shall be maintained at a minimum of 1,400 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 using an applicable AQMD or EPA approved method. For the purpose of this condition, a deviation shall be defined as when a combustion chamber temperature of less than 1,400 degrees Fahrenheit occurs during 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 action to maintain the combustion chamber temperature at or above 1,400 degrees Fahrenheit, and keep records of the duration and cause (including unknown cause, if applicable) of the deviation and the corrective action taken.  
All deviations shall be reported to the AQMD on a semi-annual basis pursuant to the requirements specified in 40 CFR Part 64.9 and Condition Nos. 22 and 23 in Section K of this permit. The semi-annual monitoring 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 a 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.  
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.

**H23.4** This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	109

**K67.1** The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):  
to show compliance with conditions C1.2, D12.1, and A63.1 and shall be maintained and kept on file for at least two years and shall be made available to the Executive Officer or his representative upon request.