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ENGINEERING AND COMPLIANCE	511927-28, 511930	DATE 07/12/10
PERMIT APPLICATION EVALUATION AND CALCULATIONS	PROCESSED BY AED	CHECKED

**PERMIT TO CONSTRUCT EVALUATION  
(Laser Cutter, APC, Title V Revision)**

**OWNER/OPERATOR:** ROHR, INC. OPERATING AS GOODRICH AEROSTRUCTURES

**FACILITY ID:** 800113

**EQUIPMENT LOCATION:**8200 ARLINGTON AVE., RIVERSIDE, CA 92503

**MAILING ADDRESS:** SAME AS ABOVE

**Title V Permit Revision Application:**

A/N: 511927

**PERMITS TO CONSTRUCT**

**EQUIPMENT DESCRIPTION:**

Equipment	ID No.	Connected To	Source Type/ Monitoring Unit	Emissions	Conditions
<b>Process 20: LASER CUTTING</b>					
CUTTER, R&D PROTOTYPE, SPI LASER REDENERGY, MODEL #20/HS, WITH FOUR LASERS, 1000 WATTS MAXIMUM INPUT, INCORPORATED INTO ARGES LASER SCANNING, # TIGERCLAW-4  Reference:A/N: 511928	D260	C261		PM: RULE 405	B59.10, C1.24, D29.2, D323.1, E57.1, E147.1, E175.6, E193.2
DUST COLLECTOR, FUMEX, FA1, WITH ONE POLYESTER PREFILTER, ONE MERV 11 PANEL FILTER, ONE HEPA, & ONE 5 POUND ADSORBER (CARBON AND ALUMINA IMPREGNATED WITH POTASSIUM PERMANGANATE)  Reference:A/N: 511930	C261	D260		PM: RULE 404	A63.21, C6.19, D29.2, D90.2, D322.4, D381.2, E102.1, E193.2, H23.14, K67.1

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**Laser Cutter Conditions:**

**B59.10** The operator shall not use the following materials in this device:

Materials containing any toxic air containants (TAC) listed in Table 1 of Rule 1401 except methyl ethyl ketone, with an effective date of June 5, 2009, or earlier.

C1.24 The operator shall limit the material processed to no more than 30 lb(s) in any one calendar month.

For the purposes of this condition, material processed shall be defined as the total weight of material being cut by the laser.

For the purpose of this condition, material processed shall be defined as resin impregnated carbon fiber, resin impregnated fiberglass, epoxy film adhesive, and peel ply material.

To comply with this condition, the operator shall maintain records of the type of material used, total length, width and thickness of the material being cut.

The operator shall maintain records in a manner approved by the District, to demonstrate compliance with this condition.

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 eliminate 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 Emissions Evaluation", within three business days and report any deviations to AQMD.

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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 emissions observation records by operator or a certified smoke reader.

**E57.1** The operator shall vent this equipment to an air pollution control device which is in full use and which has been issued a permit to operate by the Executive Officer whenever it is in operation.

**E147.1** The operator shall only conduct the processing of resin impregnated carbon fiber, resin impregnated fiberglass, epoxy film adhesive, and peel ply material in this equipment.

**E175.6** The operator shall not use this equipment unless all exhaust air passes through the following:

A HEPA filter that is individually DOP tested with 0.3 micron particulates and certified to have an efficiency of not less than 99.97%.

**E193.2** The operator shall construct this equipment according to the following requirements;

This permit shall expire if the construction of this equipment is not complete within one year from the date of the issuance of this permit 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.

**Dust Collector Conditions:**

**A63.21** The operator shall limit emissions from this equipment as follows:

CONTAMINANT	EMISSION LIMIT
Visible emissions	Less than or equal to 0 Percent Opacity

**C6.19** The operator shall use this equipment in such a manner that the differential pressure being monitored, as indicated below, does not exceed 4.5 inches water column.

To comply with this condition, the operator shall install and maintain a(n) differential pressure gauge to accurately indicate the differential pressure across the filter media.

The operator shall determine and record the parameter being monitored once every 7 days.

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**D29.2** 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
PM10 emissions	Approved District Method	District-approved averaging time	Simultaneous inlet and outlet
Total hydrocarbon emissions	Approved District Method	District-approved averaging time	outlet
Polyunuclear Aromatic Hydrocarbons (PAH)	Approved District Method	District-approved averaging time	outlet
Cyanide emissions	Approved District Method	District-approved averaging time	outlet

A speciated analysis shall be conducted for organic compounds using GC/MS.

The source test shall be conducted no later than 210 days after the initial start-up of this equipment unless otherwise approved in writing by the District.

Two complete copies of source test protocol shall be submitted to the District engineer no later than 90 days after the initial start-up of this equipment unless otherwise approved in writing by the District. The test protocol shall be approved in writing by the District before the test commences.

The test protocol shall include, but not limited to, 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 tests shall be submitted to the District engineer at least 14 days prior to source testing date so that an observer from the District may be present.

Two complete copies of source test reports shall be submitted to the District engineer within 45 days after the source testing date.

The source test report shall also include, exhaust flow rate, moisture content, O2 concentration, the number of panels used during the test, number of holes cut, and diameter and depth of each hole cut

**D90.2** The operator shall periodically monitor the hydrocarbon concentration at the inlet and outlet according to the following specifications:

The operator shall use a District approved Organic Vapor Analyzer (OVA) to monitor the parameter.

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The operator shall calibrate the instrument used to monitor the parameter in ppmv methane.

The operator shall monitor once every month

The monitoring frequency shall be reduced to at least quarterly, if three consecutive monthly monitoring show no hydrocarbon readings.

The monitoring frequency shall be increased to once every month, no later than 30 days after the discovery of any hydrocarbon readings.

The operator shall maintain records to demonstrate compliance with this condition.

**D322.4** The operator shall perform a monthly inspection of the equipment and filter media for leaks, broken or torn filter media, and improperly installed filter media.

**D381.2** 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, the operator shall take corrective action(s) that eliminate 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.

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

**E102.1** The operator shall discharge dust collected in this equipment only into closed containers.

**E193.2** The operator shall construct this equipment according to the following requirements;

This permit shall expire if the construction of this equipment is not complete within one year from the date of the issuance of this permit 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.

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**H23.14** This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule Rule/Subpart
PM	District Rule	1155

**K67.1** The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s);  
The name of the person performing the inspection and/or maintenance of the filter media  
The date, time and results of the inspection.  
The date, time and description of any maintenance or repairs resulting from the inspection.

**BACKGROUND:**

Rohr submitted A/Nos: 511927 (Title V revision), 511928 (Laser Cutter #3) and 511930 (Dust Collector) on June 22, 2010 for expedited permit processing for new construction. The proposed laser cutter is very similar to existing cutters D248 and D253, with the exception of an increase in power input from 220 Watts to 1000 Watts to improve overall cutting efficiency.

Rohr is a RECLAIM/Title V facility. A Title V renewal permit was issued to this facility on July 6, 2010. Rohr has proposed to revise their Title V renewal permit (with A/N: 511927) by adding this new laser cutter and dust collector. This permit revision is considered a “de minimis significant permit revision” to the Title V renewal permit, as described in the Regulation XXX evaluation.

**PROCESS DESCRIPTION:**

Rohr manufactures aerospace components for commercial and military aircraft. They perform metal and composite material processing, structural bonding and assembly operations. Manufacturing processes conducted at this location include composite bonding, resin curing, core stabilizing, primer and topcoat spray painting, roller coating, degreasing, solvent cleaning, metal surface preparation, abrasive blasting and tooling preparation.

The above laser cutting equipment is a prototype and will be used to conduct preliminary testing and collecting necessary data for building much larger size equipment to be used for a full production in the future. The laser cutter is used to cut test panels which are representative of manufactured aircraft parts and are comprised of resin impregnated carbon fibers, resin impregnated fiberglass, epoxy film adhesive and peel ply epoxy resin film. The laser is enclosed and the emissions from the cutting process are vented to the air pollution control system.

According to the information provided by the applicant, the volume of material removed has been determined to be 0.0919 lb per panel. At the processing rate of ten panels per day, the total amount of material removed will be 0.919 pounds per day. No more than ten panels will be processed per day since

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the processing time takes anywhere from one to three hours per panel. The laser cutter is operated up to 18 hr/day, 7 day/wk and 52 wk/yr.

**EMISSIONS CALCULATIONS:**

**PM10 Emissions:**

Operating the laser cutter results in particulate matter emissions. The PM emissions will be calculated based on the total amount of material removed of one pound per day, 99.97 HEPA filter control efficiency, and operating maximum 18hrs/day. It is assumed that 98% of material removed will be PM emissions, and the remaining 2% contributes to VOC and TAC emissions.

**PM:**

$$\begin{aligned} \text{Uncontrolled (R}_1\text{)} &= 1 \text{ lb (material removed)} \times 0.98 = 0.98 \text{ lb/day} \quad ( 0.0544 \text{ lb/hr}) \\ \text{Controlled (R}_2\text{)} &= 0.98 \text{ lb/day} \times (1-0.9997) = 2.94 \times 10\text{E-}04 \text{ lb/day} \quad ( 0.00001 \text{ lb/hr}) \end{aligned}$$

$$(\text{PM}_{10} = \text{PM})$$

**VOC Emissions:**

**VOC Emissions:**

It is assumed that maximum of 2% of the material removed contributes to VOC emissions.

$$\begin{aligned} \text{Uncontrolled(R}_1\text{)} &= 1 \text{ lb (material removed)} \times 0.02 = 0.02 \text{ lb/day} \quad ( 0.0011 \text{ lb/hr}) \\ \text{Controlled (R}_2\text{)} &= 0.02 \text{ lb/day} \quad ( 0.0011 \text{ lb/hr}) \end{aligned}$$

**TOXIC EVALUATION:**

According to the Material Safety Data Sheets (MSDS) submitted with this application, Rohr will be using a prepreg test panel that contains toxic air contaminant, methyl ethyl keton (MEK), identified in Table I of Rule 1401, as amended June 5, 2009 (less than 2%). For worst case scenario, it is assumed the total material removed is the prepreg, and the maximum MEK emissions is 2% of the total amount of material removed.

**MEK:**

$$\begin{aligned} \text{Uncontrolled(R}_1\text{)} &= 1 \text{ lb (material removed)} \times 0.02 = 0.02 \text{ lb/day} \quad ( 0.0011 \text{ lb/hr}) \\ \text{Controlled (R}_2\text{)} &= 0.02 \text{ lb/day} \quad ( 0.0011 \text{ lb/hr}) \end{aligned}$$

During laser cutting some toxic air contaminants (TAC) are released. The following table summarizes the toxic emissions measured during the source test to determine the TAC emissions from identical device.

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<i>TAC Component</i>	<i>lbs/lb of Material Removed per day</i>	<i>Adjusted hourly lbs component/lbs Material Removed</i>	<i>lb/yr</i>
Cyanide	0.0031	0.000172	1.131
Benzene	0.0030	0.000166	0.06059
Methyl Bromide	0.00055	0.00003	0.0109
Dichlororodifluoromethane	0.00045	0.000025	0.164
PAH's	0.0000045	0.00000025	0.00164

The equipment qualifies as a point source, and risk analysis was conducted for MEK and TAC compounds. According to the attached Tier I Health Risk Assessment, based on the maximum possible emissions from the laser cutter, with an operating schedule of 18 hrs/day, 365 day/yr, the proposed operation of the equipment will be in compliance with the limits of the Rule. A permit condition will be placed on the permit to limit the equipment to less than 30 lbs/day of material removed. The Health Risk analysis is located at the end of this evaluation.

Cancer/Chronic ASI  
3.36E-01  
Passed

Acute ASI  
2.65E-04  
Passed

## **RULE ANALYSIS**

- RULE 212** (c)(1) This section requires a public notice for all new or modified permit units that emit air contaminants located within 1,000 feet from the outer boundary of a school. No public notice is required since no school is located within 1,000 ft from the above site.
- (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). The equipment will not result in on-site emission increases exceeding the daily maximums for any criteria pollutant emissions as specified in Rule 212(g). Therefore, a 30-day public notice period will not be required.
- (c)(3) This section requires a public notice for all new or modified permit units with increases in emissions of toxic air contaminants listed in Table I of Rule 1401 resulting in a cancer risk equal or greater than one in a million. The proposed addition of the new laser cutter with PM10 and VOC control systems will result in a slight increase in toxic emissions. However, the increase is negligible and there will not be an increased MICR in excess on one in a million and the chronic/acute health hazard risk from this project will remain below 1.0. Public notice is not required under this section of the rule.

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212(g) This section requires a public notice for all new or modified sources that result in emission increases exceeding any of the daily maximums as specified by Rule 212(g). The proposed addition of the new laser cutter will not result in an emission increase exceeding the daily maximums.

	Maximum Daily Emissions					
	ROG	NO <sub>x</sub>	PM <sub>10</sub>	SO <sub>2</sub>	CO	Pb
Emission increase	0	0	0	0	0	0
MAX Limit (lb/day)	<b>30</b>	<b>40</b>	<b>30</b>	<b>60</b>	<b>220</b>	<b>3</b>
Compliance Status	Yes	Yes	Yes	Yes	Yes	Yes

**RULES 401 & 402:** Emissions from the laser cutter are being vented to an air pollution control system consisting of a prefilter, a panel filter, and a HEPA filter for particulate emission control and a carbon adsorber for any VOC emission control. With the proper operation and maintenance, compliance with this rule is expected.

**RULE 404:** The flow rate from the multi-stage filtration control equipment is specified at 165 cfm. Particulate emissions are 0.00001 lbs/hr.

$$0.00001 \text{ lbs/hr} \times 7000 \text{ grains/lb} \div (165 \text{ ft}^3/\text{min})(60 \text{ min/hr}) = 0.000007 \text{ grains/ft}^3$$

Rule 404 specifies that the particulate emission concentration for air flow rates of less than 883 cfm shall not exceed 0.196 grains/cf. The emissions from the multi-stage filtration unit will be less than this limit. Compliance with this rule is expected.

**RULE 405** The particulate emissions from the laser cutter are less than the limits specified in this rule of 0.99 lbs/hr. Compliance with this rule is expected.

**RULE 1155:** The laser cutter is totally enclosed and the emissions including PM are vented to an air pollution control system consisting of multiple filters. The rule requires the control system be operated with no visible emissions. In order to ensure that the operation of the equipment will not result in visible emissions to the atmosphere, a pressure drop limit is being specified in the permit with a requirement for monitoring and recording the pressure drop on a weekly basis. Further, the operator is required to check the filters on a monthly basis for leaks, broken or torn filter media, and improperly installed filter media. Therefore, the operation of the air pollution control equipment with the above specified conditions will ensure compliance with the Rule.

**RULE 1303(a):** PM emissions from the laser cutter are vented to a dust collector and HEPA filters. Potential PM10 emissions are controlled by 99.97%. VOC emissions are controlled by a carbon adsorber which satisfies BACT requirements.

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**RULE 1303(b)(1):** Laser cutter hourly PM10 emissions are 0.00001 lbs/hr which is below 0.41 lb/hr. Modeling is not required.

**RULE 1303(b)(2):** Emission offsets are not required since the emissions associated with this equipment is negligible.

**RULE 1303(b)(4):** The facility is expected to be in full compliance with all applicable rules and regulations of the District.

**RULE 1401:** Toxics: Rule 1401 contains the following requirements:

- 1) **(d)(1) MICR and Cancer Burden** - The cumulative increase in MICR which is the sum of the calculated MICR values for all toxic air contaminants emitted from the new, relocated or modified permit unit will not result in any of the following:
  - (A) an increased MICR greater than one in one million ( $1.0 \times 10^{-6}$ ) at any receptor location, if the permit unit is constructed without T-BACT;
  - (B) an increased MICR greater than ten in one million ( $1.0 \times 10^{-5}$ ) at any receptor location, if the permit unit is constructed with T-BACT;
  - (C) a cancer burden greater than 0.5.
- 2) **(d)(2) Chronic Hazard Index** - The cumulative increase in total chronic HI for any target organ system due to total emissions from the new, relocated or modified permit unit will not exceed 1.0 at any receptor location.
- 3) **(d)(3) Acute Hazard Index** - The cumulative increase in total acute HI for any target organ system due to total emissions from the new, relocated or modified permit unit will not exceed 1.0 at any receptor location.

According to the information that were submitted with these applications, Rohr, Inc. will be using material that contains toxic air contaminants (TAC) identified in Table 1 of Rule 1401. However, as indicated in the emission calculations, the emissions from the laser is negligible and passes a Tier I health risk assessment.

The laser cutter will be conditioned such that it will not be permitted to use any material containing any toxic air contaminants listed under Rule 1401 as amended June 5, 2009 except MEK. Compliance is expected.

Cancer/Chronic ASI	Acute ASI
3.36E-01	2.65E-04
Passed	Passed

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**REGULATION XXX**

The proposed project is considered as a “de minimis significant permit revision” for non-RECLAIM pollutants and hazardous air pollutants, and a “minor permit revision” for RECLAIM pollutants.

Rule 3000(b)(6) 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 (HAP) 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 (lb/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 1<sup>st</sup> permit revision to the Title V renewal permit issued to this facility on July 6, 2010.

Revision	HAP	VOC	NOx*	PM10	SOx	CO
First Permit Revision; Addition of laser cutter (D260), Dust collector (C261)	0	0	0	0	0	0
Cumulative Total	0	0	0	0	0	0
Maximum Daily	30	30	40*	30	60	220

\* RECLAIM pollutant, not subject to emission accumulation requirements

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” for non-RECLAIM pollutants or HAPs.

**RECLAIM Pollutants**

Rule 3000(b)(12)(A)(v) defines a “minor permit revision” as any Title V permit revision that does not result in an emission increase of RECLAIM pollutants over the facility starting Allocation plus

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nontradeable Allocations, or higher Allocation amount which has previously undergone a significant permit revision process.

Since NOx is a RECLAIM pollutant for this facility, a separate analysis shall be made to determine if the proposed permit revision is considered a “minor permit revision” for RECLAIM pollutants. The proposed equipment additions will not result in an increase in NOx emissions. As a result, this proposed project is considered as a “minor permit revision” for RECLAIM pollutants.

**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” for non-RECLAIM pollutants and hazardous air pollutants, and a “minor permit revision” for RECLAIM pollutants, 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 raise any objections within the review period, a revised Title V permit with conditions (as specified in the sample facility permit) will be issued to this facility.