

<b>SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT</b>  <i>ENGINEERING and COMPLIANCE</i>  <b>APPLICATION PROCESSING AND CALCULATIONS</b>	PAGES 5	PAGE 1
	APPL. NO. Below	DATE 11/02/09
	PROCESSED BY T. Iwata	CHECKED BY

Northrop Grumman  
500-800 N. Douglas St.  
El Segundo, CA 90245  
ID: 18294

**EQUIPMENT DESCRIPTION:**

**SECTION H**

Equipment	ID No.	Connected To	Source Type/ Monitoring Unit	Emissions	Conditions
<b>Process 5: FABRICATED METALS</b>					
<b>System 3: ABRASIVE BLASTING</b>					
BAGHOUSE, UNITED AIR SPECIALISTS, MODEL NO. MCB-09-10-H, TWELVE 12" DIA. X 39" L. CARTRIDGE-TYPE FILTERS, 4,080 SQ. FT. TOTAL FILTER AREA, PULSE JET CLEANING SYSTEM, ONE 10 HP BLOWER  A/N: 502552	C227	D100		PM: (9) [RULE 404]	C6.7 D322.5 E102.1 K67.4
BAGHOUSE, UNITED AIR SPECIALISTS, MODEL NO. SFC4-2-DD, FOUR 13" DIA. X 26" L. CARTRIDGE-TYPE FILTERS, 1,020 SQ. FT., PULSE JET CLEANING SYSTEM, ONE 7.5 HP BLOWER  A/N: 502553	C228	D100		PM: (9) [RULE 404]	C6.7 D322.5 E102.1 K67.4

A/N 502554: Title V Facility Permit Revision

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## **CONDITIONS**

C6.7:

The operator shall use this equipment in such a manner that the differential pressure being monitored, as indicated below, does not exceed 6 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 cartridges.

D322.5:

The operator shall perform annual inspection of the equipment and filter media for leaks, broken or torn filter media, and improperly installed filter media.

E102.1:

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

K67.4:

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

Name of person conducting inspection and maintenance of the filter media.

Date, time and results of inspection.

Date, time and description of repairs made.

Daily record of pressure drop across the filter media.

## **BACKGROUND:**

Northrop Grumman submitted application nos. 502552 and 502553 to permit two new baghouses which will replace two existing baghouses (Device Nos. C101 and C213). The functionally identical replacements will operate as the existing units but will have improved emissions control efficiency, lower maintenance costs and lower equipment downtime. Permits to Construct will be issued for the replacement baghouses and once the baghouses are constructed, the previous baghouses will be removed from service and the device numbers will be removed from the facility permit.

Northrop Grumman is a Title V facility. A Title V renewal permit was issued to this facility on May 12, 2005. Northrop Grumman has proposed to revise their Title V renewal permit, under application no. 502554, by adding two baghouses (Device Nos. C227 and C228). This permit



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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.

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.

RULE 1303(a): The baghouses control PM10 emissions from the abrasive blasting room by at least 90%. BACT is achieved for the blasting room.

RULE 1303(b)(1): There will not be an increase in PM10 emissions, thus, modeling is not required.

RULE 1303(b)(2): The new baghouses will operate with an improved emissions control efficiency over the existing baghouses. There will not be an increase in PM10 emissions. Emission offsets are not required.

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

RULE 1401: There will not be an increase in toxic air contaminants with the replacement baghouses. Compliance is expected.

**REGULATION XXX:**

The proposed project is considered as a “de minimis significant permit revision” to the Title V renewal permit issued to this facility on May 12, 2005. 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 (lbs/day)
HAP	30
VOC	30
NOx	40
PM10	30
SOx	60
CO	220

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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 5<sup>th</sup> permit revision to the Title V renewal permit issued to this facility on May 12, 2005. The following table summarizes the cumulative emission increases resulting from all permit revisions since the Title V renewal permit was issued:

<b>Revision</b>	<b>HAP</b>	<b>VOC</b>	<b>NO<sub>x</sub>*</b>	<b>PM10</b>	<b>SO<sub>x</sub></b>	<b>CO</b>
Previous Permit Revision Total	0	2	0	7	0	35
5 <sup>th</sup> Permit Revision; add two baghouses (device nos. C227 and C228)	0	0	0	0	0	0
Cumulative Total	0	2	0	7	0	35
Maximum Daily	30	30	40*	30	60	220

\* RECLAIM pollutant, not subject to emission accumulation requirements

### **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 the EPA for a 45-day review pursuant to Rule 3003(j). If the EPA does not raise any objections within the review period, a revised Title V permit will be issued to this facility.