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**PERMIT TO
CONSTRUCT/OPERATE EVALUATION**

Applicant's Name	TABC
Company ID	0003968
Mailing Address	6375 N. PARAMOUNT BLVD., LONG BEACH, CA 90805
Equipment Address	SAME AS ABOVE

EQUIPMENT DESCRIPTION:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions and Requirements	Conditions
PROCESS 1: SURFACE COATING					
TANK, ELECTRO-DEPOSITION, WIDTH: 13 FT.; HEIGHT: 14 FT. 6 IN.; LENGTH: 53 FT. 6 IN. A/N 439148-543638	D1	C112		VOC: (9) [RULE 1115, 5-12-1995; RULE 1171, 11-7-2003; <i>RULE 1171, 5-1-2009;</i>	E54.1, <u>H23.5</u>

A/N 543637:

RECLAIM/TITLE V PERMIT REVISION, MINOR

BACKGROUND:

TABC, Inc. filed application 543638 on October 19, 2012 as modification to existing electrodeposition tank device D1 operating under a/no. 439148 to allow processing of coating automobile axles. This facility is in the RECLAIM/Title V program. A/N 543637 was filed for the RECLAIM/Title V permit revision (MINOR). The latest Title V renewal was issued on 11/2/2010. This application is part of the 3rd Title V permit revision since then.

The facility has been operating 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 or Notices of Violation issued in the last two years. However, a Notice to comply was issued on 6/23/11 (E05231) asking the company to submit Quaterly NOx Emissions Report by its due date. The facility complied with the Notice to Comply on 6/30/11.

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PROCESS DESCRIPTION:

The proposed modification will allow the company to process automobile axles through the existing electro—deposition tank. Currently, the motor vehicles parts in the electro-deposition tank are subject to rule 1115 as indicated in Emissions and Requirements Section of the facility permit. However, the processing of automobile axles is not subject to rule 1115 but rule 442 instead. Rule 1115 limits apply to motor vehicle application line which is defined in the rule as “that portion of a motor vehicle assembly production line which applies surface and other coatings to motor vehicle bodies, hoods, fenders, cargo boxes, doors, and grill opening panels.” As such, the company has proposed to include rule 442 as an applicable rule to the operation of this tank. There will not be any change in the physical dimensions, chemical-make up or process in the electro-deposition tank as a result of this modification. The company will continue to use same coating that is currently used. The existing tank is vented to an afterburner operating under device id no. C112 to which there would not be any change and will also suffice the requirements of section (d)(1) of Rule 442.

The tank is operated 8 hr/day x 2 days/week x 52 week/yr.

EMISSIONS AND ANALYSIS:

Given (Per applicant):

Amount of Axles processed per day: 963

Axle painted surface area: 9048 cm²

Estimated Target Film build: 35 microns

Estimated daily ED paint usage per axle: 31.7 ml

Estimated Daily ED paint usage: 30.5 L

VOC content of ED paint: 0.02 lb/gal (Previous Permit Evaluation)

Daily VOC Emissions due to proposed modification:

$$R1: \frac{0.02 \text{ lb/gal} \times 30.5 \text{ liters/day}}{3.78 \text{ liters/1 gal}} = 0.16 \text{ lb/day}$$

$$R2L 0.16 \text{ lb/day} \times 0.15 \text{ (85\% Overall Efficiency for RTO)} = 0.02 \text{ lb/day}$$

As indicated above, there would minimal increase in emissions due to the proposed modification. Therefore, emissions from the previous application (No. 439148) will be entered in the new application for data entry purposes. The VOC emissions from the previous applications are:

$$R1 = 0.25 \text{ lb/hr}$$

$$R2 = 0.07 \text{ lb/hr} \times 8 \text{ hr/day} \times 2 \text{ days/week} \times 52 \text{ week/yr} = 58 \text{ lb/yr.}$$

Also the company has a facility-wide VOC cap of 2,767 pounds/day which will not change as result of this modification.

TOXIC EVALUATION:

The company will be using same coating that is used currently and in the same amount. Therefore, there would not be any increase in compounds identified in rule 1401 as result of this modification. As such, no toxic evaluation is required.

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RULES:

- 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. This facility is not located within 1,000 feet from the outer boundary of a school. Therefore, public notice will not be required by this section.
- RULE 212(c)(2) This section requires a public notice for all new or modified facilities which have on-site emission increases exceeding any of the daily maximums as specified in subparagraph (g). The proposed modification will result in minimal emission increase. Therefore, public notice will not be required by this section.
- RULE 212(c) (3) The company will continue to use the same coating as currently being used and in the same amount. Therefore, there will not be any toxics emissions increase from the proposed modification. Therefore public notice will not be required by this section.
- RULE 212(g) This section requires a public notice for all new or modified permit units which undergo construction or modifications resulting in an emissions increase exceeding any of the daily maximums as specified in subparagraph (g). There is a minimal emission increase from the proposed modification; therefore, public notice will not be required by this section.
- RULE 401 Visible emissions are not expected with proper operation of this equipment.
- RULE 402 Operation of equipment is not expected to create a nuisance.
- Rule 442: The company, in lieu of meeting emission limits in section (d), is venting the electro-deposition tank to an afterburner operating under device C112. The afterburner is tested to destroy at least 95% of VOC emissions and is expected to reduce the overall VOC emissions by 85% (90% Collecton and 95% destruction). Therefore, compliance is expected with this rule.
- Rule 1115: The facility complies with this rule by using dip coating application method and use of compliant coatings. In addition, emissions from this tank are vented to an afterburner to reduce VOC emissions. The applicant is not proposing any changes that will affect compliance with this rule.
- REG. XIII The proposed modification does not result in emissions increase of greater than 1 lb/day and 0.5 lb/day (30-day ave) and thus the requirements of this regulation are not triggered.
- RULE 1401 The company will continue to use the same coating as currently being used and in the same amount. Therefore, there will not be any toxics emissions increase from the proposed modification. Therefore, the requirements of this rule are not applicable.
- Regulation XX: The proposed project does not increase NOx or SOx emissions and thus this requirements of this regulations are not applicable to the proposed modification.

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Regulation XXX:

This facility is in the RECLAIM/Title V program. The proposed project is considered as a “minor permit revision” to the Title V permit for this facility.

Rule 3000(b) (4) defines a “minor permit revision” as any Title V permit revision does not result in an increase in emissions of a pollutant subject to Regulation XIII - New Source Review or a hazardous air pollutant.

To determine if a project is considered as a “minor 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 3rd permit revision to the Title V renewal permit issued to this facility on November 2, 2010. The following table summarizes the cumulative emission increases resulting from all permit revisions since the Title V renewal permit was issued.

Title V Permit Revisions Summary

	Revision	HAP	VOC	NO _x	PM ₁₀	SO _x	CO
Previous 2 Revisions	Inactivation of Catalyst manufacturing line and installation of Polyproplene Storage Silo with dust collector.	0	0	0	0	0	0
3 rd	Modification to existing Electro-deposition Tank to allow processing of automobile axles.	0	0	0	0	0	0
Cumulative Total		0	0	0	0	0	0
Maximum Daily		30	30	40	30	60	220

Since the cumulative emission increases resulting from all permit revisions does not result in an increase in emissions of a pollutant subject to Regulation XIII - New Source Review or a hazardous air pollutant, this proposed project is considered as a “minor permit revision”.

CONCLUSION:

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 facility 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 RECLAIM/Title V permit will be issued to this facility with the following conditions:

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CONDITIONS:

E54.1. The operator is not required to vent this equipment to the following equipment if any of the requirements listed below are met:

Device ID: C112 [AFTERBURNER, ED COATING]
 Requirement number 1: purging prior to incinerator start-up

H23.5. This equipment is subject to the applicable requirements of the following rules or regulations:

<u>Contaminant</u>	<u>Rule</u>	<u>Rule/Subpart</u>
VOC	District	Rule 109
VOC	District	Rule 442