

South Coast Air Quality Management District

Statement of Basis

Proposed Title V Renewal Permit

Facility Name:	New Basis
Facility ID:	040806
SIC Code:	3089
Equipment Location:	2626 Kansas Avenue Riverside, CA 92507
Application #(s):	519740
Application Submittal Date(s):	3/11/2011
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1. Introduction and Scope of Permit

Title V is a national operating permit program for air pollution sources. Facilities subject to Title V must obtain a Title V permit and comply with specific Title V procedures to modify the permit. This permit replaces the facility's other existing permits. Title V does not necessarily include any new requirements for reducing emissions. It does, however, include new permitting, noticing, recordkeeping, and reporting requirements.

Pursuant to Title V of the federal Clean Air Act and AQMD Rule 3004(f), a Title V permit shall expire five years from the date of issuance unless such permit has been renewed. Accordingly, each facility is required to submit a Title V renewal application and requested the AQMD to renew their Title V permit. The proposed permit incorporates updates to the facility information provided in the facility's Title V renewal application and all rules and regulations that are currently applicable to the facility.

The AQMD implements Title V through Regulation XXX – Title V Permits, adopted by the AQMD Governing Board in order to comply with EPA's requirement that local air permitting authorities develop a Title V program. Regulation XXX was developed with the participation of the public and affected facilities through a series of public workshops, working group meetings, public hearings and other meetings.

The Title V major source threshold for a particular pollutant depends on the attainment status of the pollutant. NO₂, SO₂, CO, and lead are in attainment with federal standards. The status for PM-10 is serious nonattainment. The status for ozone is currently extreme nonattainment.

A Title V renewal permit is proposed to be issued to cover the operations of New Basis located at 2626 Kansas Avenue, Riverside, CA 92507. This facility is subject to Title V requirements because it is a major source.

2. Facility Description

This is an existing facility applying for a Title V permit renewal that is engaged in the manufacturing of polymer concrete products. The facility operates various spray booths, blending/mixing equipment, storage tanks, baghouses and other supporting equipment. Volatile organic compound emissions from a spray booth and two mixers are vented to an air pollution control equipment regenerative thermal oxidizer.

3. Construction and Permitting History

The facility has been in constant operation with a Title V permit at this location since 2001. A Title V renewal permit was issued to the facility on March 26, 2006.

4. Regulatory Applicability Determinations

Applicable legal requirements for which this facility is required to comply are required to be identified in the Title V permit (for example, Section D, E, and H of the proposed Title V permit). Applicability determinations (i.e., determinations made by the District with respect to what legal requirements apply to a specific piece of equipment, process, or operation) can be found in the Engineering Evaluations. This facility is not subject to any NSPS requirements. The facility HAP emissions are less than the major source threshold. The facility however is subject to 40 CFR63 Subpart WWWW National Emission Standards for Hazardous Air Pollutants: Reinforced Plastics Composites Production. The NESHAP requirements are reflected in the Title V permit.

5. Monitoring and Operational Requirements

Applicable monitoring and operational requirements for which the facility is required to comply are identified in the Title V permit (for example, Section D, F, and J and Appendix B of the proposed Title V permit). Discussion of any applicable operational requirements can be found in the Engineering Evaluations. All periodic monitoring requirements were developed using strict adherence to the following applicable guidance documents: SCAQMD Periodic Monitoring Guidelines for Title V Facilities (November 1997); CAPCOA/CARB/EPA Region IX Periodic Monitoring Recommendations for Generally Applicable Requirements in SIP (June 1999); and CAPCOA/CARB/EPA Region IX Recommended Periodic Monitoring for Generally Applicable Grain Loading Standards in the SIP: Combustion Sources (July 2001).

The facility operates a regenerative thermal oxidizer controlling the VOC emissions from a spray booth and two polymer concrete mixers. The uncontrolled VOC emissions to the air pollution control equipment are greater than the major source threshold for VOC of 10 tons per year. As a result, the operation of the regenerative thermal oxidizer is subject to the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64. Permit conditions have been added to the

oxidizer to satisfy the CAM requirements. Such permit conditions were developed using the design criteria and other pertinent requirements identified in 40 CFR 64-Compliance Assurance Monitoring and Technical Guidance Document and in the August 1998 Revised Draft CAM.

The facility also operates five baghouse/dust collectors controlling the PM emissions from a silos, resin mixers and a loading cell. However, since the uncontrolled PM₁₀ emissions to each baghouse are less than 70 tons per year, the CAM requirements are not applicable to this operation.

6. Permit Features

Permit Shield

A permit shield is an optional part of a Title V permit that gives the facility an explicit protection from requirements that do not apply to the facility. A permit shield is a provision in a permit that states that compliance with the conditions of the permit shall be deemed compliance with all identified regulatory requirements. To incorporate a permit shield into the Title V permit involves submission of applications for change of conditions for each equipment affected by the permit shield. Permit shields are addressed in Rule 3004 (c). This facility has not applied for a permit shield.

Streamlining Requirements

Some emission units may be subject to multiple requirements which are closely related or redundant. The conditions may be streamlined to simplify the permit conditions and compliance. Emission limits, work practice standards, and monitoring, recordkeeping, and reporting requirements may be streamlined. Compliance with a streamlined condition will be deemed compliance with the underlying requirements whether or not the emission unit is actually in compliance with the specific underlying requirement. This facility has not applied for any streamlined conditions.

7. Summary of Emissions and Health Risks

Criteria Pollutant Emissions (tons/year)
Annual Reported Emissions for Reporting Period 2010

Pollutant	Emissions (tons/year)
NO _x	0.092
CO	0.025
VOC	15.841
PM	0.928
SO _x	0

**Toxic Air Contaminants Emissions (TAC)
Annual Reported Emissions for Reporting Period 2010**

The Following TACs Were Reported	Emissions (lbs/year)
Ammonia	25.74
Formaldehyde	0.024
Benzene	0.011

Health Risk from Toxic Air Contaminants

The facility is subject to review by the Air Toxics Information and Assessment Act (AB2588). The Final Facility Health Risk was approved in 1997 with the following risk factors.

Cancer Risk	0 in one million
Acute Hazard Index	0.73
Chronic Hazard Index	0.20

8. Compliance History

As noted, the facility has been in constant operation with a Title V permit since 2001. The facility has been subject to both self-reporting requirements and AQMD inspections. The facility has had no citizen complaints filed in the last two years. However, four Notices to Comply have been issued to provide records, test results, and VOC calculations, permanently enclose a spray booth, provide dimensions and capacity for silos, and resubmit annual and semi-annual reports. The facility has provided all requested records, test results, calculations, and dimensions, and resubmitted the reports. In addition, two Notices of Violation have been issued for operating a spray booth and permanent total enclosure without a valid permit to operate, exceeding the daily VOC limit, operating the VOC control system without 2nd and 3rd stage exhaust filters and without a continuous temperature measuring and recording system and below the minimum temperature limit, and failing to submit the semi-annual monitoring and annual compliance certification reports. The facility is currently operating in compliance with all applicable rules and permit conditions.

9. Compliance Certification

By virtue of the Title V permit application and issuance of this Title V renewal permit, the reporting frequency for compliance certification for the facility shall be annual.