South Coast Air Quality Management District

Statement of Basis

Proposed Title V Permit Renewal

Facility Name:	Prime Wheel
Facility ID:	105903
SIC Code:	3490
Equipment Location:	17704 S. Broadway Street Carson, CA 90746
Application #(s):	537670
Application Submittal Date(s):	05/10/12
Permit Revision #:	Renewal
Revision Date:	
Permit Section(s) Affected:	All
AQMD Contact Person:	Michael Solis, Air Quality Engineer
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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 request 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. NO_2, SO_2, CO and lead are in attainment with federal standards. The status for PM-10 is serious nonattainment. The status for ozone is currently extreme non-attainment.

A Title V permit is proposed to be issued to cover the operations of Prime Wheel Corporation located at 17704 South Broadway Street, Carson. This facility is subject to Title V requirements because it is a major source.

2. Facility Description

This is an existing facility that is in the business of manufacture of aluminum wheels. The facility is operating a surface preparation tunnel, several aluminum holding furnaces, aluminum melting furnaces, heat treating furnaces, spray booths, drying ovens, baghouses and abrasive blasting equipment.

3. Construction and Permitting History

The facility has been in constant operation since 1998. Numerous permits to construct and permits to operate have been issued to the facility since 1/20/1999. An initial Title V permit was issued to the facility on 07/14/2008.

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 or NESHAP requirements.

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). Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 do not apply to any of the permitted emission sources at this facility. Emission units at this facility with a control device, have potential pre-control devices emissions of the applicable regulated air pollutant below the amount, in tons per year, required for source to be classified as a major source.

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 for any rule.

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 2011

Pollutant ID	Pollutant Description	Annual Emissions
CO	Carbon Monoxide	8.183
NOX	Nitrogen Oxides	18.901
ROG	Reactive Organic Gases	8.489
SOX	Sulfur Oxides	0.140
TSP	Total Suspended Particulates	1.918

Toxic Air Contaminants Emissions (TAC, lbs/yr)
Annual Reported Emissions for Reporting Period 2011

Pollutant ID	Pollutant Description	Annual Emissions
7664417	Ammonia	8417.642
71432	Benzene	3.058
50000	Formaldehyde	6.491
91203	Naphthalene	0.140
1151	PAHs, total, w/components not reported	0.046

Health Risk from Toxic Air Contaminants

The facility is subject to review by the Air Toxics Information and Assessment Act (AB2588). Annual Ammonia emissions were reported using the incorrect emission factor. The correct emissions factor should be 3.2 lbs/mmscf and not 18 lbs/mmscf. Using the new emission factor, the correct annual ammonia emissions reported should be 1,496.32 lbs. Prime Wheel has

notified the district of the error and they plan to submit an amended Annual Emissions Report (AER) for Reporting Year 2011. The facility is under AB2588 Tracking Status by the AQMD.

8. Compliance History

As noted, the facility has been in constant operation since 1998. The facility has been subject to both self-reporting requirements and AQMD inspections. The facility has had no citizen complaint filed, one Notice to Comply issued, and no Notice of Violation issued in the last two calendar years. The Notice to Comply was due to incorrect RECLAIM reporting. This issue has been resolved.

9. Compliance Certification

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