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ENGINEERING AND COMPLIANCE	546537-8, 546543	DATE 04/3/13
PERMIT APPLICATION EVALUATION AND CALCULATIONS	PROCESSED BY AED	CHECKED

**PERMIT TO CONSTRUCT EVALUATION  
(Laser Cutters, Dust Collector)**

**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: 546544 (De minimis Significant Permit Revision)

**SECTION H: 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, LASER NO. 1, 220 WATTS MAXIMUM INPUT  Reference: A/N: 546538	D275	C277		PM: [RULE 405, 2-7-1986]	B59.12, C1.20, D323.1, E57.1, E147.1, E193.2
CUTTER, R&D PROTOTYPE, LASER NO. 2, 1000 WATTS MAXIMUM INPUT  Reference: A/N: 546543	D276	C277		PM: [RULE 405, 2-7-1986]	B59.12, C1.24, D323.1, E57.1, E147.1, E193.2
DUST COLLECTOR, FSC2, THREE STAGE FILTERS CONSISTING: PRE-FILTER, 220 SQ. FT, SECOND STAGE ACTIVATED CARBON & ALUMINA, AND ONE 1 SQ. FT HEPA FINAL FILTER, 2 H.P. BLOWER, 552 CFM  Reference:A/N: 546537	C277	D275, D276		PM: [RULE 404, 2-7-1986]	A63.21, C6.19, D90.2, D322.4, D381.2, E102.1, E175.6, E193.2, H23.14, K67.1

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**Laser Cutter # 1 Conditions:**

**B59.12** 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 September 10, 2010, or earlier.

**C1.20** The operator shall limit the material processed to no more than 15 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 resins 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 an 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.

**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.

**Laser Cutter # 2**

**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 reins 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.

**Dust Collector Condition:**

**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 6 inches water column.

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

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

**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.

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.

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

**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: 546538, 538543 & 546537 as XPP for Permit to Construct two laser cutters and an air pollution control equipment consisting of three stage filters. The above equipment are identical to existing Devices ID D248, D253 & D260. The two laser cutters will be vented to the three stage filter system. A/N 546544 is submitted for TV permit Revision. Back in July 2012, the applicant conducted a source test for existing laser cutters and three stage filter system Devices ID D248, D253, D260, and C264. The results were conditionally acceptable as indicated in the review of the test results by SCAQMD Source Test Engineering dated on Dec. 4, 2012 (see attachment). The test results will be used for the above equipment since the equipment are identical per data provided by applicant. The air pollution control system consists of a pre-filter, an activated carbon & impregnated activated alumina, and one final HEPA filter.

This is a RECLAIM/Title V facility and the Title V renewal permit was issued to the facility on July 6, 2010. This project is the 5<sup>th</sup> permit revision since the issuance of the renewal permit. There are no records of complaints or Notices of Violation issued to the facility during the last two years. However, the facility was issued a Notice to Comply (NC) on 10/23/12 requiring the applicant to submit NOx emissions reports for process units, Rule 219 equipment, and large NOx sources as required by

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regulation XX, and submit the semi-annual compliance report on time. The applicant complied with the NC and is currently operating in compliance with the applicable rules and regulation.

**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 company will be operating the new laser cutters as prototypes and will be used to conduct more preliminary testing and collecting necessary data for building much larger size equipment to be used for a full production in the future. The configuration, operating hours and materials processed in the new R&D laser cutters will be identical as existing Devices ID D253 & D260. The laser cutters are 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. No more than ten panels will be processed per day since the processing time takes anywhere from one to three hours per panel. The laser cutters are operated up to 20 hrs/day, 7 days/wk and 52 wks/yr. Both laser cutters will be operated at any one time. Emissions from the laser cutters will be vented to a new air pollution control system Device ID C277 with three stage filters. The control system is identical to the existing control system and will consist of stage one dust filter, followed by blended activated carbon and impregnated activated alumina, and a final HEPA filter rated at 99.97% for 0.3 micron particules.

**EMISSIONS CALCULATIONS:**

The source test results conducted on July 2012 will be used to calculate PM10 and VOC emissions. The test was conducted while both existing laser cutters were in operation. The test results indicates a control efficiency of 98% for PM10 and 57.7% for VOC emissions.

The amount of material removed during the Source Test was 0.02268 lb/hr.

PM10 R1 = 0.0128 lb/hr                      Test result  
PM10R2 = 0.00026 lb/hr                      “  
VOC R1 = 0.00402 lbs/hr                      “  
VOC R2 = 0.0017 lb/hr                      “  
PM10 = 76% of material emitted to APC  
VOC = 24% of material emitted to APC  
R1 (PM10 + VOC) = 0.0128 lb/hr + 0.00402 lbs/hr = 0.01690 lbs/hr  
Total emissions vented to APC would be:  
(0.01690 lbs/hr) ÷ (0.02268 lbs/hr) x 100 = 74.5%  
Fall out: 25.5%

Laser Cutter No. 1, ID D275, A/N 546538

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**PM10 Emissions:**

Based on permit condition of maximum 15 lbs/month total material removed:  
Total material to be vented to APC = 15 lbs/month x 74.5% = 11.18 lbs/month

PM10 = 11.18 lbs/month x 76% = 8.497 lbs/month, 0.283 lbs/day  
R1 = 0.014 lbs/hr  
R2 = 8.497 lbs/month (1-0.98) = 0.1699 lbs/month, 0.00566 lbs/day  
R2 = 0.000283 lbs/hr

**VOC Emissions:**

VOC = 11.18 lbs/month x 24% = 2.68 lbs/month, 0.089 lbs/day  
R1 = 0.00446 lbs/hr  
R2 = 2.68 lbs/month x (1-0.577) = 1.134 lbs/month, 0.0378 lbs/day  
R2 = 0.00189 lbs/hr

Laser Cutter No. 2, ID# 276, A/N 546543:

**PM10 Emissions:**

Based on permit condition of maximum 30 lbs/month total material removed:  
Total material to be vented to APC = 30 lbs/month x 74.5% = 22.36 lbs/month

PM10 = 22.36 lbs/month x 76% = 16.99 lbs/month, 0.566 lbs/day  
R1 = 0.028 lbs/hr  
R2 = 16.99 lbs/month (1-0.98) = 0.34 lbs/month, 0.0113 lbs/day  
R2 = 0.000567 lbs/hr

**VOC Emissions:**

VOC = 22.36 lbs/month x 24% = 5.37 lbs/month, 0.179 lbs/day  
R1 = 0.0089 lbs/hr  
R2 = 5.37 lbs/month x (1-0.577) = 2.27 lbs/month, 0.075 lbs/day  
R2 = 0.00378 lbs/hr

**Dust collector (Device ID 277, A/N 546537):**

The facility will be venting the two new laser cutters to the new air pollution control system Device ID# 277 with three stage filters . According to the applicant the equipment consists of stage one dust filter, followed by blended activated carbon and impregnated activated alumina. The final filter will be a HEPA filter rated at 99.97% for 0.3 microns particules.

Test results indicates a control efficiency of 98% for PM10 and 57.7% for VOC.

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**RULE 1401 EMISSIONS:**

According to applicant the facility will be using the same material processed in the existing laser cutters, and there would no change in the operating hours or configuration of the units. Methyl ethyl ketone is the only Rule 1401 toxic air contaminant listed in the material safety data sheets for the test panels.

Test results indicates the following toxics compound being emitted from the operation of the laser cutter:

Component	lbs/hour
HCN	0.0000176
PAH's	6.57 E-09
MEK	9.78E-06

Risk screening was performed using the Risk Assessment spread sheets in the appendix. The emissions from the laser cutter are below Tier 1 screening levels:

Cancer/Chronic ASI	Acute ASI
5.89E-02	1.05E-04
Passed	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 project will result in a slight increase in toxics emissions. However, the the risks are below the threshold limits. Therefore, a public notice under the provision of this rule will not be triggered.

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).

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The proposed project will not result in an emission increase exceeding the daily maximums. Therefore, a public notice under the provision of this rule will not be triggered.

	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 will be vented to an air pollution control system consisting of a prefilter, a carbon absorber with alumina, and a HEPA filter. With the proper operation and maintenance, no visible emissions are expected from the above operations. Compliance with this rule is expected.

**RULE 404: (A/N 546537)** The flow rate from the multi-stage filtration control equipment is specified at 68 cfm. Particulate emissions for both laser cutters would be:  
Total PM10 emissions = 0.00085 lbs/hr

$0.00085 \text{ lbs/hr} \times 7000 \text{ grains/lb} \div (68 \text{ ft}^3/\text{min}) (60 \text{ min/hr}) = 0.00146 \text{ grains/ft}^3$   
Rule 404 specifies that the particulate emission concentration for air flow rates of less than 883 cfm shall not exceed 0.196 grains/ft<sup>3</sup>. The emissions from the multi-stage filtration unit will be less than this limit. Compliance with this rule is expected.

**RULE 1303(a):** PM emissions from the laser cutter are vented to a dust collector and HEPA filters which satisfies BACT requirements.

**RULE 1303(b)(1):** Controlled hourly PM10 emissions are 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 after control 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:

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- (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, MEK emissions from the laser cutter 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 September 10, 2010 except methyl ethyl ketone. Compliance is expected.

### **REGULATION XXX**

This facility is in the RECLAIM program. The proposed project is considered as a “de minimis significant permit revision” for non-RECLAIM pollutants or hazardous air pollutants (HAPs), and a “minor permit revision” for RECLAIM pollutants to the RECLAIM/Title V permit for this facility.

#### Non-RECLAIM Pollutants or HAPs

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 HAPs 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
NO <sub>x</sub> *	40
PM <sub>10</sub>	30
SO <sub>x</sub> *	60
CO	220

\* Not applicable if this is a RECLAIM pollutant

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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 July 6, 2010. The following table summarizes the cumulative emission increases resulting from all permit revisions since the Title V renewal permit was issued:

Revision	HAP	VOC	NO <sub>x</sub> *	PM <sub>10</sub>	SO <sub>x</sub>	CO
Previous permit Revisions.	0	0	1*	0	0	1
5 <sup>th</sup> . Permit Revision Construction two laser cutters D275, D276, to be vented to new dust collector C277.	0	0	0	0	0	0
Cumulative Total	0	0	1	0	0	1
Maximum Daily	30	30	40*	30	60	220

\* RECLAIM pollutant, not subject to emission accumulation requirements

+ Reduced emissions will not be subtracted from Cumulative Total

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

Since NO<sub>x</sub> 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. However, the proposed changes will not result in an increase in NO<sub>x</sub> 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

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3003(j). If EPA does not raise any objections within the review period, a revised Title V permit will be issued to this facility.