



**SOUTH COAST AIR QUALITY
MANAGEMENT DISTRICT
ENGINEERING AND COMPLIANCE DIVISION**

Coating, Printing, Aerospace & Metal Finishing Team

PERMIT APPLICATION EVALUATION

Page 1 of 13
A/Ns 500473-78
Processed by WW
Reviewed by SMKE
Date 12/18/09

**PERMIT TO CONSTRUCT/OPERATE
POWDER BOOTH, OVENS & WASHER**

Applicant's Name: AMF Anaheim LLC
Facility ID: 149235
Mailing Address: 2100 E. Orangewood Ave, Anaheim, CA 92806
Equipment Address: 2100 E. Orangewood Ave, Anaheim, CA 92806

EQUIPMENT DESCRIPTION

A/N 500478

Title V – Deminimus Permit Revision

A/N 500473 (PO no PC)

SPRAY BOOTH #1, NORDSON, MODEL CK-7200, 14'-4" W. X 10'-6" L. X 10'-10" H., WITH EXHAUST FILTERS CONSISTING OF EIGHT 3'-0" L. X 1'-0" DIA. PRIMARY CARTRIDGE FILTERS AND FOUR 1'-8" W. X 2'-0" L. SECONDARY BOX-TYPE FILTERS AND ONE 5 H.P. EXHAUST FAN.

A/N 500474 (PO no PC)

SPRAY BOOTH #2, NORDSON, MODEL CK-7200, 14'-4" W. X 10'-6" L. X 10'-10" H., WITH EXHAUST FILTERS CONSISTING OF EIGHT 3'-0" L. X 1'-0" DIA. PRIMARY CARTRIDGE FILTERS AND FOUR 1'-8" W. X 2'-0" L. SECONDARY BOX-TYPE FILTERS AND ONE 5 H.P. EXHAUST FAN.

A/N 500475 (PO no PC)

SIX STAGE WASHER, INDUSTRIAL PROCESS EQUIPMENT, INC, MODEL 5707-W, 68'-0" L. X 7'-0" W. X 13'-6" H., CONSISTING OF:

- 1. ONE HEATED PHOSPHATE SPRAY SYSTEM WITH ONE HUNDRED SIXTY SPRAY NOZZLES, ONE 10 H.P. SPRAY TANK, ONE 1,148 GALLONS TANK, WITH ONE 2,000,000 BTU/HOUR ECLIPSE IJ-6 NATURAL GAS FIRED BURNER.*



**SOUTH COAST AIR QUALITY
MANAGEMENT DISTRICT
ENGINEERING AND COMPLIANCE DIVISION**

Coating, Printing, Aerospace & Metal Finishing Team

PERMIT APPLICATION EVALUATION

Page	2 of 13
A/Ns	500473-78
Processed by	WW
Reviewed by	SMKE
Date	12/18/09

- 2. ONE HEATED PHOSPHATE SPRAY SYSTEM WITH ONE HUNDRED SIXTY SPRAY NOZZLES, ONE 10 H.P. SPRAY TANK, ONE 1,148 GALLONS TANK, WITH ONE 2,000,000 BTU/HOUR ECLIPSE IJ-6 NATURAL GAS FIRED BURNER.*
- 3. ONE WATER RINSE SPRAY SYSTEM WITH NINETY-SIX SPRAY NOZZLES, ONE 7-1/2 H.P. SPRAY PUMP, ONE 623 GALLONS TANK.*
- 4. ONE PURE WATER RINSE SPRAY SYSTEM WITH NINETY-SIX SPRAY NOZZLES, ONE 7-1/2 H.P. SPRAY PUMP, ONE 623 GALLONS TANK.*
- 5. ONE NON-CHROME SEAL SPRAY SYSTEM WITH FORTY-EIGHT SPRAY NOZZLES, ONE 1 H.P. SPRAY PUMP, ONE 374 GALLONS TANK*
- 6. ONE DEIONIZED WATER RINSE SPRAY SYSTEM WITH FORTY-EIGHT SPRAY NOZZLES, ONE 1 H.P. SPRAY PUMP, ONE 374 GALLONS TANK.*

A/N 500476 (PO no PC)

OVEN, DRYING, INDUSTRIAL PROCESS EQUIPMENT, INC, MODEL 5707-DO, 14'-7" W. X 23'-7" L. X 13'-11" H., 1,000,000 BTU/HR ECLIPSE WX0100 WINNOX LOW NO_x DIRECT NATURAL GAS FIRED BURNER, WITH ONE 1.5 H.P. COMBUSTION AIR FAN, ONE 1.5 H.P. EXHAUST FAN AND ONE 10 H.P. RECIRCULATION FAN.

A/N 500477 (PO no PC)

OVEN, CURING, INDUSTRIAL PROCESS EQUIPMENT, INC, MODEL 5707-CO, 17'-3" W. X 43'-0" L. X 13'-8" H., 4,000,000 BTU/HR ECLIPSE WX0400 WINNOX LOW NO_x DIRECT NATURAL GAS FIRED BURNER, WITH ONE 5 H.P. COMBUSTION AIR FAN, ONE 3 H.P. EXHAUST FAN AND TWO 25 H.P. RECIRCULATION FANS.

A/N 503451 (Admin change to PN F92081, A/N 470394)

OVEN, RAMCO, MODEL 10-10-8, 10'-0" W. X 10'-6" L. X 8'-6" H., 800,000 BTU/HR NATURAL GAS FIRED, WITH ONE 1/3 H.P. COMBUSTION AIR BLOWER, ONE 7 1/2 H.P. CIRCULATING FAN, AND ONE 2 H.P. EXHAUST FAN.

Depth should be seven feet



**SOUTH COAST AIR QUALITY
MANAGEMENT DISTRICT
ENGINEERING AND COMPLIANCE DIVISION**

Coating, Printing, Aerospace & Metal Finishing Team

PERMIT APPLICATION EVALUATION

Page	3 of 13
A/Ns	500473-78
Processed by	WW
Reviewed by	SMKE
Date	12/18/09

A/N 503450 (Admin change to PN F92076, A/N 470388)

OVEN, CURING, RAMCO, 8'-0" W. X 14'-0" D. X 8'-0" H., 800,000 BTU/HR NATURAL GAS FIRED, WITH A MAXON CYCLOMAX LOW NO_x BURNER, A 1/2 H.P. COMBUSTION AIR FAN, A 1/2 H.P. EXHAUST FAN AND A 7-1/2 RECIRCULATION FAN.

Depth should be nine feet.

Conditions Spray Booth:

1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN COMPLIANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.
2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
3. A GAUGE SHALL BE INSTALLED TO INDICATE, IN INCHES OF WATER, THE STATIC PRESSURE DIFFERENTIAL ACROSS THE EXHAUST FILTERS. IN OPERATION, THE PRESSURE DIFFERENTIAL SHALL NOT EXCEED 2.0 INCHES OF WATER ACROSS THE PRIMARY FILTERS AND 1.5 INCHES OF WATER ACROSS THE FINAL FILTERS.
4. THIS EQUIPMENT SHALL BE OPERATED IN COMPLIANCE WITH RULES 1107 AND 1171.
5. THE TOTAL QUANTITY OF VOLATILE ORGANIC COMPOUND (VOC) EMISSIONS DISCHARGED TO THE ATMOSPHERE FROM THIS FACILITY SHALL NOT EXCEED 372 POUNDS IN ANY ONE DAY. (FACILITY CONDITION)
6. THE TOTAL QUANTITY OF POWDER COATING MATERIALS APPLIED IN THIS EQUIPMENT SHALL NOT EXCEED 1,500 POUNDS IN ANY ONE DAY.
7. IN ADDITION TO THE RECORDKEEPING REQUIREMENTS IN RULE 109, THE OPERATOR SHALL KEEP ADEQUATE RECORDS FOR THIS EQUIPMENT TO VERIFY THE DAILY POWDER COATING USAGE IN POUNDS AND THE DAILY VOC EMISSIONS IN POUNDS. THE VOC EMISSIONS FROM THE USE OF POWDER COATINGS SHALL BE CALCULATED USING THE EMISSION FACTOR DETERMINED PURSUANT TO SCAQMD METHOD 316C. IN CASE NO



**SOUTH COAST AIR QUALITY
MANAGEMENT DISTRICT
ENGINEERING AND COMPLIANCE DIVISION**

Coating, Printing, Aerospace & Metal Finishing Team

PERMIT APPLICATION EVALUATION

Page	4 of 13
A/Ns	500473-78
Processed by	WW
Reviewed by	SMKE
Date	12/18/09

LABORATORY TESTED EMISSION FACTOR IS AVAILABLE, THEN A FACTOR OF 0.01 POUNDS OF VOC PER POUND OF POWDER SPRAYED SHALL BE USED.

8. MATERIALS USED IN THIS EQUIPMENT SHALL NOT CONTAIN ANY TOXIC AIR CONTAMINANTS IDENTIFIED IN RULE 1401, TABLE I, WITH AN EFFECTIVE DATE OF JUNE 5, 2009.
9. MATERIAL SAFETY DATA SHEETS FOR ALL MATERIALS USED AT THIS FACILITY AND SUBJECT TO DISTRICT RULES SHALL BE KEPT CURRENT AND MADE AVAILABLE TO DISTRICT PERSONNEL UPON REQUEST.

Conditions Ovens:

1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN COMPLIANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.
2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
3. THE OXIDES OF NITROGEN (NO_x) EMISSIONS DISCHARGED FROM THIS EQUIPMENT SHALL NOT EXCEED 30 PPM, CALCULATED AS NO_x, BY VOLUME ON A DRY BASIS @ 3% O₂, AVERAGED OVER 15 CONSECUTIVE MINUTES.
4. THIS OVEN SHALL NOT BE OPERATED AT TEMPERATURES ABOVE 450 DEGREES FAHRENHEIT.

Conditions Washer:

1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN COMPLIANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.
2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
3. THE BURNER IN THIS EQUIPMENT SHALL NOT USE MORE THAN 23,077 CUBIC FEET OF NATURAL GAS IN ANY ONE DAY.



**SOUTH COAST AIR QUALITY
MANAGEMENT DISTRICT
ENGINEERING AND COMPLIANCE DIVISION**

Coating, Printing, Aerospace & Metal Finishing Team

PERMIT APPLICATION EVALUATION

Page	5 of 13
A/Ns	500473-78
Processed by	WW
Reviewed by	SMKE
Date	12/18/09

4. A NON-RESETTABLE TOTALIZING FUEL METER SHALL BE INSTALLED AND MAINTAINED TO VERIFY COMPLIANCE WITH THE DAILY NATURAL GAS USAGE LIMIT.
5. THE OPERATOR SHALL MAINTAIN A NATURAL GAS CONSUMPTION LOG TO VERIFY COMPLIANCE WITH THE NATURAL GAS USAGE LIMIT. THE LOG SHALL INCLUDE, AT A MINIMUM, THE DATE OF OPERATION OF THIS EQUIPMENT, THE GAS METER READING AT THE BEGINNING OF EACH DAY BEFORE THE EQUIPMENT IS OPERATED, AND AT THE END OF EACH DAY AFTER THE EQUIPMENT IS SHUT DOWN.
6. MATERIALS USED IN THIS EQUIPMENT SHALL NOT CONTAIN ANY TOXIC AIR CONTAMINANTS IDENTIFIED IN RULE 1401, TABLE I, WITH AN EFFECTIVE DATE OF JUNE 5, 2009. OR EARLIER.

BACKGROUND

AMF Anaheim LLC manufactures sheet metal chassis and panels. Operations include shaping and forming, cleaning, finishing, and assembly. The company submitted the above eight applications on 11/4/09 for PO no PC and 2 administrative change for 2 ovens.

The conveyerized powder coating system will operate under the existing facility-wide VOC emission limit of 372 lb/month. Therefore there will be no increase in VOC emissions. The company requested 1,500 pounds powder usage for each spray booth. The primary and secondary filters are expected to control most of the PM10 emissions as described in the manufacturer's information in the file. Total PM10 emissions will be less than a pound per day and will be less than 4 tons per year. There will be increase in NOX emissions due to the combustion of natural gas-fired burners from the 2 ovens and a six-stage washer. The ovens are equipped with Eclipse Winnox Low NOx. The manufacturer had issued performance guarantees stating emissions of NOx and CO from the ovens not to exceed 30 ppmv corrected to 3% oxygen therefore complies with Rule 1147. The manufacturer provided emissions guarantee from the burners associated with the parts washer state the emissions of NOx will not exceed 100 ppmv corrected to 3%. oxygen. Based on the age of the equipment and per Rule 1147(g)(6), the parts washer is exempt from the emission limits in Table 1 until July 2014. AMF uses water and acetone for clean-up therefore complies with Rule 1171.

The two ovens for administrative change are to correct the ovens' depths. There is no emission increase due to this modification.

 <p style="text-align: center;">SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING AND COMPLIANCE DIVISION <i>Coating, Printing, Aerospace & Metal Finishing Team</i> PERMIT APPLICATION EVALUATION</p>	<table> <tr> <td>Page</td> <td>6 of 13</td> </tr> <tr> <td>A/Ns</td> <td>500473-78</td> </tr> <tr> <td>Processed by</td> <td>WW</td> </tr> <tr> <td>Reviewed by</td> <td>SMKE</td> </tr> <tr> <td>Date</td> <td>12/18/09</td> </tr> </table>	Page	6 of 13	A/Ns	500473-78	Processed by	WW	Reviewed by	SMKE	Date	12/18/09
Page	6 of 13										
A/Ns	500473-78										
Processed by	WW										
Reviewed by	SMKE										
Date	12/18/09										

AMF is a Title V facility. The proposed project is considered as a “de minimis significant permit revision” to the initial Title V permit, as described in Regulation XXX evaluation.

PROCESS DESCRIPTION

AMF utilizes metal forming equipment, including CNC machines, precision laser cutters, and robotic welders in shaping and forming operations. In addition to metal forming and shaping, AMF also performs metal finishing operations, including liquid and powder coating.

Following shaping and forming operations, metal parts will be directed to the six-stage parts washer for cleaning before they are directed to the powder coating spray booths. The powdered coated parts are cured inside the ovens. The Cyclo-Kinetic Powder Coating System are equipped with a two-stage of filtration. The primary filters used are the PowderGrid Plus filters rated at 99% efficient and the secondary filters are rated as 95% DOP filters. Manufacturer’s information for the filters is in the file.

EMISSION CALCULATIONS

The facility is operating under an emission cap of 372 lbs/day of VOC. There will be no VOC emission increase from the facility since the facility cap will remain the same. Both powder booths will have an equipment limit of 1,500 lbs. of powder coatings applied per day and will be equipped with 99% filters.



**SOUTH COAST AIR QUALITY
MANAGEMENT DISTRICT
ENGINEERING AND COMPLIANCE DIVISION**

Coating, Printing, Aerospace & Metal Finishing Team

PERMIT APPLICATION EVALUATION

Page 7 of 13
A/Ns 500473-78
Processed by WW
Reviewed by SMKE
Date 12/18/09

1. PM = PM10 Emissions:

Items	Symbol	Value
Powder throughput (lb/day)	Q	1,500
Transfer Efficiency (spray gun)	TE	65%
Control Efficiency for 2-stage filtration	CE	99%

**each spray booth*

Max	Hrs/Day	Day/Wk	Day/Mo
Schedule	24	7	52

PM, R1 = Q * (1-TE)
PM, R2 = R1 * (1-CE)
PM, 30-day avg = R2/22

Emittants	Max	Max
PM=PM10	lb/day	lb/hr
R1	525	22
R2	5.25	0.22

A/N	R1	R1	R2	R2
	lb/day	lb/hr	lb/day	lb/hr
500473	525	22	5.25	0.22
500474	525	22	5.25	0.22

Particulate Matter Conc'n (grains/dscf) = R2 x 7000 grains/lb/12,000 CFM x 60 min/hr
= 0.00002 grains/dscf (complies with Rule 404)

2. VOC Emissions (from Ovens)

Powder Coating has 1% VOC by weight = (1,500 lbs/day) (0.01 lbs/lb) = 15 lb/day, 0.6 lb/hr
There will be no VOC emission increase from the facility since the facility cap will remain the same.

3. NOx Emissions

Six Stage Parts Washer:

The company cannot use Low-NOx burners with the parts washer but the manufacturer provided emissions guarantee that NOx emissions will not exceed 100 ppmv corrected to 3% oxygen. The company has agreed to the natural gas usage condition for the burners so offset is not triggered.

 <p>SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING AND COMPLIANCE DIVISION <i>Coating, Printing, Aerospace & Metal Finishing Team</i> PERMIT APPLICATION EVALUATION</p>	Page 8 of 13 A/Ns 500473-78 Processed by WW Reviewed by SMKE Date 12/18/09
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E.F. – 130 lb NOx/million cubic feet of natural gas

$$\begin{aligned} \text{ft}^3 \text{ nat. gas/month} &= 3 \text{ lb NOx/day} \times (1 \text{ MM ft}^3 \text{ nat gas}/130 \text{ lb NOx}) \\ &= 23,077 \text{ ft}^3 \text{ NG per day} \end{aligned}$$

Summary of emissions from the oven combustion of natural gas:

Ovens	NOx		CO		PM/PM ₁₀	
	lb/hr	lb/day	lb/hr	lb/day	lb/hr	lb/day
500475	0.14	3.3	0.06	1.5	0.01	0.32
500476	0.04	0.89	0.03	0.8	0.01	0.17
500477	0.15	3.54	0.13	3.2	0.03	0.69

**See attached spreadsheet for combustion emission calculations.*

4. Six Stage Washer = aqueous solution line.

RULE EVALUATION

RULE 212(c)(1) *This section requires a public notice for all new and modified permit units that may emit air contaminants located within 1,000 feet from the outer boundary of a school.*

Since there are no schools within 1,000 feet of the facility, a public notice will not be required by this section.

RULE 212(c)(2) *This section requires a public notice for all new and modified facilities which have on-site emission increases exceeding any of the daily maximums specified in subdivision (g).*

There will be an increase in emissions from the combustion of natural gas. The following table summarizes the emission limits and increases. Since the increases are below the thresholds, public notice will not be required by this section.

LB/DAY	CO	NOX	PM10	ROG	LEAD	SOX
Max Limit	220	40	30	30	3	60
Increases	6	8	11	0	0	0



**SOUTH COAST AIR QUALITY
MANAGEMENT DISTRICT
ENGINEERING AND COMPLIANCE DIVISION**

Coating, Printing, Aerospace & Metal Finishing Team

PERMIT APPLICATION EVALUATION

Page 9 of 13
A/Ns 500473-78
Processed by WW
Reviewed by SMKE
Date 12/18/09

RULE 212(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 resulted in MICR greater than $1E^{-6}$ per permit unit or greater than $10E^{-6}$ per facility.*

There will be no emissions of TAC from this equipment. Therefore, public notice is not required.

RULE 212(g) *This section requires a public notice for all new and modified sources that have equipment emission increases exceeding any of the daily maximum as specified by Rule 212 (g).*

As shown in the following table, the emission increase from the project due to this modification will not exceed the daily maximum limits below. The following table summarizes the emission limits and increases. Public notice is not required.

	<u>ROG</u>	<u>NO_x</u>	<u>PM₁₀</u>	<u>SO₂</u>	<u>CO</u>	<u>Pb</u>
Per Equipment	0	8	11	0	6	0
MAX MDC Limit (lb/day)	30	40	30	60	220	3
Required Public Notice	No	No	No	No	No	No

RULE 401 Visible Emissions

Visible emissions are not expected with proper maintenance and operation of this equipment. The system shows no visible emissions complaints at this location.

RULE 402 Nuisance

Operation of this equipment is not expected to create complaints or nuisance with proper maintenance and operation. The system shows no nuisance complaints at this location.

RULE 404 Particulate Matter – Concentration

The particulate matter concentration discharged from the powder spray booth is below the concentration at standard conditions shown in Table 404(a). Compliance is expected.

 <p style="text-align: center;">SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING AND COMPLIANCE DIVISION <i>Coating, Printing, Aerospace & Metal Finishing Team</i> PERMIT APPLICATION EVALUATION</p>	Page	10 of 13
	A/Ns	500473-78
	Processed by	WW
	Reviewed by	SMKE
	Date	12/18/09

RULE 1107 *Metal Coating Operations*

The powder coating is applied with an electrostatic gun. Compliance is expected.

<i>Coating</i>	<i>Rule 1107 VOC Limit</i>	<i>Actual VOC Content</i>
General	2.3 lb/gal	0 – 0.22 lb/gal

RULE 1171 *Solvent Cleaning Operations*

The powder coating guns are cleaned by blowing air through the guns. They also use acetone and water. Compliance is expected.

REG XIII *Rule 1303(a), Best Available Control Technology (BACT)*

The powder coating spray booths are equipped with a two-stage filtration system with estimated control efficiency of 99% for particulate matter. This complies with BACT for powder booths. Tube burners on surface prep tanks do not require Low-NOx burners. NOx emissions will be 3 lb/day since they will take a natural gas usage cap of 23,077 cu. ft./day. The other ovens are equipped with Low NOx burners.

Rule 1303 (b)(1), Modeling

PM10 emissions are under the allowable of 0.41 lb/hr (Table A-1), therefore modeling is not required.

The calculated values for the combustion emissions are less than the screening limits in Table A-1, therefore no further modeling analysis is required

	NOx lb/hr	CO lb/hr	PM ₁₀ lb/hr
Table A-1 Limit <2 MM Btu/hr	0.2	11.0	1.2
A/N 500476 – Drying Oven	0.04	0.03	0.01
A/N 500475 – Washer	0.14	0.06	0.01

	NOx lb/hr	CO lb/hr	PM ₁₀ lb/hr
Table A-1 Limit >2-<5 MM Btu/hr	0.31	17.1	1.9
A/N 500477 – Curing Oven	0.15	0.13	0.03



**SOUTH COAST AIR QUALITY
MANAGEMENT DISTRICT
ENGINEERING AND COMPLIANCE DIVISION**

Coating, Printing, Aerospace & Metal Finishing Team

PERMIT APPLICATION EVALUATION

Page 11 of 13
A/Ns 500473-78
Processed by WW
Reviewed by SMKE
Date 12/18/09

Rule 1304 (c)(1), Offsets Exemption

NOx emissions for the part washer are 3 lb/day based on the natural gas usage cap of 23,077 cu ft/day. The facility emits 4 tons of NOx per year and less than 4 tons of PM10 per year (Table A) from permitted and associated equipment. Therefore, offsets are not required for NOx and PM10. The 2007 and 2008 reported AER NOx report shows 0.046 and 0.075 tons per year (includes unpermitted equipment). Below are the facility's calculated NOx and PM10 emissions:

<i>Equipment</i>	<i>A/N</i>	<i>P/O #</i>	<i>NOx (lb/day)</i>	<i>PM₁₀ (lb/day)</i>
Oven, Drying	460284	F92037	1	
Oven, Baking	460287	F92038	1	
Oven, Drying	460289	F92039	1	
Oven, Baking	460290	F92044	5	
Oven, Drying	460388	F92076	1	
Powder, Spray Booth	470374	F92067		1
Powder, Spray Booth	470379	F92068		2
Powder, Spray Booth	470380	F92069		2
Powder, Spray Booth	470382	F92070		1
Powder, Spray Booth	470383	F92071		2
Oven, Drying	470389	F92077	1	
Oven, Drying	470390	F92078	1	
Oven, Drying	470392	F92079	1	
Oven, Drying	470394	F92081	2	
Powder, Spray Booth	470463			1
Powder, Spray Booth	500473			5
Powder, Spray Booth	500474			5
Oven (Low Nox)	500476		1	
Oven (Low Nox)	500477		4	1
Ovens, Washer	500475		3	
Total (lb/day)			22.00	20.00
Total (ton/yr)			4.0	3.7

RULE 1401

New Source Review of Toxic air Contaminants

The MICR calculations of toxic emissions from combustion of natural gas indicate compliance with rule requirements. See attached toxic evaluation.

REG XXX

The proposed project is considered as a “de minimis significant permit revision” to the Title V permit issued on September 4, 2007. Rule 3000(b)(6) defines a “de minimis significant permit revision” as any Title V permit revision where the cumulative emission



**SOUTH COAST AIR QUALITY
MANAGEMENT DISTRICT
ENGINEERING AND COMPLIANCE DIVISION**

Coating, Printing, Aerospace & Metal Finishing Team

PERMIT APPLICATION EVALUATION

Page 12 of 13
A/Ns 500473-78
Processed by WW
Reviewed by SMKE
Date 12/18/09

increases on 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:

<i>Air Contaminant</i>	<i>Daily Maximum (lbs/day)</i>
HAP	30
VOC	30
NO _x	40
PM ₁₀	30
SO _x	60
CO	220

Rule 3003(j) specifies that a proposed permit for the initial Title V renewal permit shall be submitted to EPA for review. To determine if a project qualifies for a “de minimis significant permit revision”, emission increases resulting from all permit revisions that are made after the submittal of proposed permit to EPA shall be accumulated and compared to the above threshold levels. The proposed project is the third permit revision requested by the facility since the submittal of the proposed permit to EPA. This permit revision includes the change of condition for two powder spray booths. The cumulative emission increases resulting from this proposed permit revision are summarized as follows:

<i>Revision</i>	<i>HAP</i>	<i>VOC</i>	<i>NO_x</i>	<i>PM₁₀</i>	<i>SO_x</i>	<i>CO</i>
3 rd Revision: Add new powder spray booths (A/Ns 500473 and 500474), add new washer, A/N 500475, add new ovens (A/Ns 500476 and 500477) and administrative change to correct equipment description on two ovens (A/Ns 503451 and 503452).	0	0	8	11	0	6
2 nd Revision: Add new Aerosol Can Recycling System, A/N 492529.	0	0	0	0	0	0
1 st Revision: Change permit condition to increase throughput on two powder spray booths, A/N 473461 and 473462	0	0	0	5	0	0
Revision 0 (administrative): change of operator from APW (ID# 110175) to AMF Anaheim (ID# 149235) issued 9/4/07 (Revision 0).	0	0	0	5	0	0
Maximum Daily Limit	30	30	40	30	60	220



**SOUTH COAST AIR QUALITY
MANAGEMENT DISTRICT
ENGINEERING AND COMPLIANCE DIVISION**

Coating, Printing, Aerospace & Metal Finishing Team

PERMIT APPLICATION EVALUATION

Page	13 of 13
A/Ns	500473-78
Processed by	WW
Reviewed by	SMKE
Date	12/18/09

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