

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

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APPLICANT'S NAME: Northrop Grumman Systems Corp.
FACILITY PERMIT ID# 800408
CONTACT PERSON: Ron Frazer
MAILING ADDRESS: One Space Park, SDS362/CS1/1800
 Redondo Beach, CA 90278
EQUIPMENT ADDRESS: 3301 Aviation Ave. Bldg. M5
 Manhattan Beach, CA 90266

PERMIT TO CONSTRUCT

Title V/RECLAIM Permit Revision:
 Application No. 554807

Equipment Description: (Previous Application 544397)

PROCESS 1: CONTROL EQUIPMENT					
Equipment	Device ID	Connected To	Source Type/ Monitoring Unit	Emissions	Equipment Specific Conditions
OXIDIZER, THERMAL, NO. 2, ALLIANCE SYSTEMS, MODEL NO. 306-RTO, 3 BED HOT ROCK TYPE, NATURAL GAS, WITH A 30-HP EXHAUST FAN, 10-HP BYPASS FAN AND A 3-HP COMBUSTION BLOWER, 1.5 MMBTU/HR, <u>WITH UP TO 1.5 MMBTU/HR NATURAL GAS INJECTION.</u> Reference A/N 544397554809	C-460	D157, D481, D572, D587, D588, D484	NOX: PROCESS UNIT	CO: 2000 PPMV (5);[RULE 407, 4-2—1982]; NOX: 130 LBS/MMSCF NATURAL GAS (1)[RULE 2012, 5-6-2005]; PM: (9)[RULE 404, 2-7-1986]; PM: 0.1 GRAINS/SCF(5)[RULE 409, 8-7-1981]	A72.1, D29.2, <u>D29.3</u> , E193.1, I331.1, K40.1,
OXIDIZER, HOT BED, NO. 1, ALLIANCE SYSTEMS, MODEL NO. 308-RTO, NATURAL GAS, THREE ZONES, 8FT W X 30FT 3IN L. X 9FT 1IN H., 1.5 MMBTU/HR, <u>WITH UP TO 1.5 MMBTU/HR NATURAL GAS INJECTION.</u> Reference A/N544398554810	C-455	D79, D80, D81, D154, D173, D174, D178, D276, D278, D279, D289, D338, D411, D412, D413, D414, D416, D417, D474, D476, D549, D618, D619	NOX: PROCESS UNIT	CO: 2000 PPMV (5); [RULE 407, 4-2-1982];NOX: 130 LBS/MMSCF NATURAL GAS (1)[RULE 2012, 5-6-2005]; PM: (9)[RULE 404, 2-7-1986]; PM: 0.1 GRAINS/SCF (5)[RULE 409, 8-7-1981]	A72.1, A72.2, D29.2, <u>D29.3</u> , E193.1, I331.1K40.1

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PROCESS 1: CONTROL EQUIPMENT					
Equipment	Device ID	Connected To	Source Type/ Monitoring Unit	Emissions	Equipment Specific Conditions
OXIDIZER, THERMAL, NO. 4, ALLIANCE SYSTEMS, MODEL NO. 306-RTO, 3 BED HOT ROCK TYPE, NATURAL GAS, WITH A 30-HP EXHAUST FAN, 10-HP BYPASS FAN AND A 3-HP COMBUSTION BLOWER, 1.5MMBTU/HR, WITH UP TO 1.5 MMBTU/HR NATURAL GAS INJECTION.	C-364	D274, D277, D335, D346, D347, D350, D352, D353, D354, D357, D358, D359, D361, D482, D589,	NOX: PROCESS UNIT	CO: 2000 PPMV (5); [RULE 407, 4-2-1982]; NOX: 130 LBS/MMSCF NATURAL GAS (1) [RULE 2012, 5-6-2005]; PM: (9) [RULE 404, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]	A72.1, D29.2, D29.3, E193.1, I331.1, K40.1,
Reference A/N 544406554808					

Conditions:

- A72.1 THE OPERATOR SHALL MAINTAIN THIS EQUIPMENT TO ACHIEVE A MINIMUM DESTRUCTION EFFICIENCY OF 95% FOR ROG DURING THE NORMAL OPERATION OF THE EQUIPMENT IT VENTS.
- A72.2 THE OPERATOR SHALL MAINTAIN THIS EQUIPMENT TO ACHIEVE AN OVERALL CONTROL EFFICIENCY OF 90 PERCENT FOR ROG DURING THE NORMAL OPERATION OF THE EQUIPMENT IT VENTS.
- D29.2 THE OPERATOR SHALL CONDUCT SOURCE TEST(S) FOR THE POLLUTANT(S) IDENTIFIED BELOW:

Pollutant(s) to be tested	Required test method(s)	Averaging Time	Test Location
VOC	Approved District Method	District Approved averaging time	Simultaneous inlet and outlet

The test shall be conducted at least once during the life of the permit but no later than July 9, 2015 unless otherwise approved in writing by the District.

The test shall be conducted to determine the VOC emissions using an approved District method to determine compliance with all applicable permit condition(s), Rules and Regulations.

The test shall be conducted while the oxidizer is operating at a temperature of not less than the minimum operating temperature specified in this permit. If the operating temperature during the source test is greater than the minimum operating temperature specified in the permit, the minimum operating temperature specified in this permit may be increased to reflect the operating temperature during the source test.

The operator shall comply with administrative conditions NOs. 8, 9, and 10 of Section E of this facility permit.

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D29.3 THE OPERATOR SHALL CONDUCT SOURCE TEST(S) FOR THE POLLUTANT(S) IDENTIFIED BELOW:

Pollutant(s) to be tested	Required test method(s)	Averaging Time	Test Location
NOx emissions	Approved District Method	District Approved averaging time	outlet
CO emissions	Approved District Method	District Approved averaging time	outlet
VOC emissions	Approved District Method	District Approved averaging time	inlet/outlet

In addition to the source test requirements of Section E of this facility permit, the facility permit holder shall submit the protocol to the AQMD engineer no later than 60 days prior to the proposed test date, and notify the District of the date and time of the test at least 10 days prior to the test.

The test shall be conducted at the inlet and the exhaust of the RTO for (1) VOC in PPMV and lbs/hr. (2) NOx emissions in PPMV and lbs/hr (exhaust only). (3) CO emissions in PPMV and lbs/hr (exhaust only). (4) VOC destruction efficiency. (5) VOC collection efficiency. (6) Usage of all VOC-containing materials during the test. (7) Oxygen content. (8) Moisture content. (9) Flow rate. (10) Temperature.

The test(s) shall be conducted within 60 days after achieving maximum production rate, but no later than 120 days after initial start-up.

The test shall be conducted while only the start-up burner is in operation (Excluding VOC testing).

The test shall be conducted during natural gas injection while the start-up burner is not in operation.

The test shall be conducted while the afterburner is operating at a temperature of not less than the minimum operating temperature specified in this permit. If the operating temperature during the source test is greater than the minimum operating temperature specified in this permit, the minimum operating temperature specified in this permit may be increased to reflect the operating temperature during the source test.

The operator shall comply with administrative conditions Nos 8, 9, and 10 of section E of this permit.

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E193.1 THE OPERATOR SHALL OPERATE AND MAINTAIN THIS EQUIPMENT ACCORDING TO THE FOLLOWING REQUIREMENTS:

The combustion chamber temperature shall be maintained at a minimum of 1,500 degrees Fahrenheit whenever the equipment it serves is in operation

The operator shall operate and maintain a temperature measuring and recording system to continuously measure and record the combustion chamber temperature pursuant to the operation and maintenance requirements specified in 40 CFR Part 64.7. Such a system shall have an accuracy of within 1% of the temperature being monitored and shall be inspected, maintained, and calibrated on an annual basis in accordance with the manufacturer's specifications

For the purpose of this condition, a deviation shall be defined as when a combustion chamber temperature of less than 1,500 degrees Fahrenheit occurs whenever the equipment it serves is in operation. The operator shall review the records of the combustion chamber temperature on a daily basis to determine if a deviation occurs or shall install an alarm system to alert the operator when a deviation occurs

Whenever a deviation occurs, the operator shall inspect this equipment to identify the cause of such a deviation, take immediate corrective action to maintain the combustion chamber temperature at or above 1,500 degrees Fahrenheit, and keep records of the duration and cause (including unknown cause, if applicable) of the deviation and the corrective action taken

All deviations shall be reported to the AQMD pursuant to the requirements specified in 40 CFR Part 64.9 and Condition Nos. 22 and 23 in Section K of this permit. The report shall include the total operating time of this equipment and the total accumulated duration of all deviations for each semi-annual reporting period specified in Condition No. 23 in Section K of this permit

The operator shall submit an application with a Quality Improvement Plan (QIP) in accordance with 40 CFR Part 64.8 to the AQMD if an accumulation of deviations exceeds 5 percent duration of this equipment's total operating time for any semi-annual reporting period specified in Condition No. 23 in Section K of this permit. The required QIP shall be submitted to the AQMD within 90 calendar days after the due date for the semi-annual monitoring report

The operator shall inspect and maintain all components of this equipment on an annual basis in accordance with the manufacturer's specifications.

The operator shall keep adequate records in a format that is acceptable to the AQMD to demonstrate compliance with all applicable requirements specified in this condition and 40 CFR Part 64.9 for a minimum of five years

I331.1 THE CONDITIONS AND REQUIREMENTS FOR THIS DEVICE IN SECTION H SHALL TAKE EFFECT, AND SHALL SUPERSEDE THOSE IN SECTION D, WHEN THE MODIFICATIONS AUTHORIZED IN SECTION H ARE COMPLETED. THE OPERATOR SHALL NOTIFY THE AQMD WHEN THE MODIFICATIONS ARE COMPLETED.

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K40.1 THE OPERATOR SHALL PROVIDE TO THE DISTRICT A SOURCE TEST REPORT IN ACCORDANCE WITH THE FOLLOWING SPECIFICATIONS:

Source test results shall be submitted to the District no later than 60 days after the source test was conducted.

Background:

Northrop Grumman Systems submitted application numbers 554808 (C364), 554809 (C460) and 554810 (C455) as a modification to existing regenerative thermal oxidizers (RTO) to add natural gas injection to maintain bed temperatures. The RTOs currently are each heated by a 1.5 mmbtu/hr direct flame burner. Over the years, the number of VOC generating devices and the quantity of VOC being generated has been reduced to where the main burner of the RTO is required to be operated at all times to maintain the chamber temperature. In order to potentially reduce the NOx emissions from the main burner, the operator is proposing to inject natural gas in the inlet of the duct to the afterburner. The addition of the natural gas injection will not change any requirements to maintain the combustion chamber temperatures at 1,500 °F. Their proposal will not change any of the venting characteristics so that all devices currently vented will continue to be vented by the same device. The injection of natural gas may reduce the NOx emissions being generated from the afterburner by reducing the flame temperature while maintaining the combustion chamber temperature. The proposed project may reduce NOx emissions generated by the RTOs which will be established by source testing to determine the NOx emissions during start-up and natural gas injection.

District records indicate that during the last two years Northrop Grumman was issued one Notice to Comply (NC E18838). This notice was issued on 12/19/2012. The NC required Northrop to file a permit application for an onsite emergency ICE. The application has been filed which will comply with this NC. This facility was also issued a Notice of Violation (NOV P54972) on 5/7/2013 for failure to maintain the thermal oxidizer C364 and operated the basic equipment it serves for six days. The airless degreaser D577 was operated in excess of the 932 cycle limit without changing the carbon filter. Records indicate that the oxidizer was restarted on 2/3/2012 and the carbon filter replaced on 9/5/2012. The facility has operated in compliance after the repairs and maintenance. There are no other Notices of Violation, Notices To Comply or Complaints on record against this facility for the last two years as of 9/19/2013

Thermal Oxidizer Capacity Evaluation:**Burner Capacity Check**

Check list

1. Combustion Chamber Temperature – 1500⁰f
2. Combustion Chamber dimensions - 4.16 ft H x 24.83 ft L x 5.67 ft W – 586 cuft
3. Combustion Chamber inlet temperature – 75⁰F
4. Exhaust temperature 200⁰F
5. Inlet Combustion flow rate (C364 = 6,000; C455 = 8,000; C460 = 5,000 cfm)

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6. Start-up burner @ 1.50 mmbtu/hr
7. Natural gas injection rate – 1.5 mmbtu/hr
8. VOC inlet estimated lbs/hr – 0 lbs/hr(worst case assumption)

% Heat Recovery:

$$\frac{(1500\text{F} - 200^{\circ}\text{F})(100)}{(1500\text{F} - 75^{\circ}\text{F})} = 91.23\%$$

Inlet Air Temp. - $1500\text{F}(0.9123) = 1368\text{F}$

Enthalpy @ $1500^{\circ}\text{F} = 28.24\text{btu/scf}$ (Table D4, Appendix D, AP40)
 $1368^{\circ}\text{F} = 25.46\text{ btu/scf}$ (Table D4, Appendix D, AP40)
 Net Enthalpy = 2.78 BTU/scf (28.24-25.46)

C364 Exhaust Flow Rate = 6,000 scfm

Net Heat (Q_{net})

$$= (6,000\text{ ft}^3/\text{min})(60\text{ min/hr})(2.78\text{ BTU/scf}) = 1,000,800\text{ BTU/hr required}$$

@ 91.23% efficient, available heat = $1050\text{btu/ft}^3(0.9123) = 957.92\text{ btu/ ft}^3$

Nat Gas injection Rate = 1.5 mmbtu/hr.

The gas line supplying the natural gas injection is the same line supplying the start-up burner. The amount of natural gas available is sufficient to maintain the combustion chamber temperature.

C455 Exhaust Flow Rate = 8,000 scfm

Net Heat (Q_{net})

$$= (8,000\text{ ft}^3/\text{min})(60\text{min/hr})(2.78\text{BTU/scf}) = 1,334,400\text{ BTU/hr required}$$

@ 91.23% efficient, available heat = $1050\text{btu/ft}^3(0.9123) = 957.92\text{ btu/ ft}^3$

Nat Gas injection Rate = 1.5 mmbtu/hr.

The gas line supplying the natural gas injection is the same line supplying the start-up burner. The amount of natural gas available is sufficient to maintain the combustion chamber temperature.

C460 Exhaust Flow Rate = 5,000 scfm

Net Heat (Q_{net})

$$= (5,000\text{ ft}^3/\text{min})(60\text{min/hr})(2.78\text{BTU/scf}) = 834,000\text{ BTU/hr required}$$

@ 91.23% efficient, available heat = $1050\text{btu/ft}^3(0.9123) = 957.92\text{ btu/cft}$

Nat Gas injection Rate = 1.5 mmbtu/hr.

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The gas line supplying the natural gas injection is the same line supplying the start-up burner. The amount of natural gas available is sufficient to maintain the combustion chamber temperature.

Combustion Emissions:

The combustion emissions from these RTOs will remain the same during start-up. The same existing burner will be used to initially heat-up the RTO. After start-up, to maintain bed temperature, the inlet air will be modified to permit natural gas injection. The natural gas will flow into the RTO, combust and thereby increase the temperature of the combustion chamber.

Devices C364, C455 & C460

Operating Schedule: 24hr/day, 7day/wk, 52 wk/yr

Burner Rating: 1,500,000 btu per hour
1.429x10E-3mmcuft/hr

Combustion Emissions from Main Burner

	Emission Factor lbs/mmcf	Hourly Emissions lbs/hr	Daily Emissions lbs/day	Annual Emissions lbs/yr	30 day average* lbs/day
ROG	7.0	0.01	0.24	87.36	0.0
NOX	130	0.186*	4.46	1,622.4	4
SOX	0.83	0.001	0.028	10.36	0.0
CO	35	0.05	1.2	438	1
PM10	7.5	0.011	0.257	93.6	0.0

*Previous NOx emissions entered into NSR & AEIS are carry overs from a previous evaluation based on a 78 ppmv NOx. The current emissions are based on the RECLAIM reporting value 130 lbs/mmcf.

Natural gas injection NOx

Based on source test results of RTO's, the NOx emissions is expected to be in the range of 1 to 2 ppm, and CO emissions are expected to be in the range of 2 to 4 ppm.

C364

$$2.0 \text{ ppm}(6,000 \text{ ft}^3/\text{min})(46 \text{ lbs/lbmole})(60 \text{ min/hr})/((10^6)(379 \text{ ft}^3/\text{lbmole})) = 0.0874 \text{ lbs NOx/hr, } 2.1 \text{ lbs NOx/day}$$

$$4.0 \text{ ppm}(6,000 \text{ ft}^3/\text{min})(28 \text{ lbs/lbmole})(60 \text{ min/hr})/((10^6)(379 \text{ ft}^3/\text{lbmole})) = 0.106 \text{ lbs CO/hr, } 2.55 \text{ lbs CO/day}$$

C455

$$2.0 \text{ ppm}(8,000 \text{ ft}^3/\text{min})(46 \text{ lbs/lbmole})(60 \text{ min/hr})/((10^6)(379 \text{ ft}^3/\text{lbmole})) = 0.116 \text{ lbs NOx/hr, } 2.79 \text{ lbs NOx/day}$$

$$4.0 \text{ ppm}(8,000 \text{ ft}^3/\text{min})(28 \text{ lbs/lbmole})(60 \text{ min/hr})/((10^6)(379 \text{ ft}^3/\text{lbmole})) = 0.142 \text{ lbs CO/hr, } 3.4 \text{ lbs CO/day}$$

C460

$$2.0 \text{ ppm}(5,000 \text{ ft}^3/\text{min})(46 \text{ lbs/lbmole})(60 \text{ min/hr})/((10^6)(379 \text{ ft}^3/\text{lbmole})) = 0.073 \text{ lbs NOx/hr, } 1.75 \text{ lbs NOx/day}$$

$$4.0 \text{ ppm}(5,000 \text{ ft}^3/\text{min})(28 \text{ lbs/lbmole})(60 \text{ min/hr})/((10^6)(379 \text{ ft}^3/\text{lbmole})) = 0.088 \text{ lbs CO/hr, } 2.13 \text{ lbs CO/day}$$

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The emissions from this modification has the potential to increase unless separate fuel meters serving the start-up burner and injection system are installed. Apart from these additions, the start-up and injection may be operated simultaneously which would result in an increase of natural gas consumption resulting in an increase in CO emissions. It is unlikely that the potential NOx emissions from the modification would actually double even though the total natural gas heating value is going from 1.5 mmbtu/hr to 3.0 mmbtu/hr. It has been demonstrated that the required heat to maintain the temperature at 1500⁰F is from 834,000 btu/hr to 1.3 mmbtu/hr. It is unlikely Northrop will use more than 1.5 mmbtu/hr. A potential decrease in NOx may occur with an estimated 2.0 ppmv NOx with natural gas injection due to the reduced flame temperature. The actual emissions increase or decrease will be determined by source test which will require testing during start-up and natural gas injection.

Risk Assessment

The toxic emissions from this equipment are not expected to change. The addition of natural gas injection is not expected to increase the fuel consumption of the oxidizer. Therefore, no change in risk is expected.

RULE EVALUATION

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.

Rule 212 (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 proposed project will result in a small emission increase for the entire facility. A Rule 212(c) (2) notice will not be triggered since the emission increase is below the daily maximum specified in Rule 212(g).

Rule 212(c)(3):This section requires a public notice for all new or modified permit unit with increases in emissions of toxic air contaminants listed in Table I of Rule 1401 resulting in MICR greater than 1E-6 per permit unit or greater than 10E-6 per facility.

The proposed project is not expected to cause a toxic emission increase by the addition of natural gas injection. Therefore Public Notice is not required under this section of the rule.

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Rule 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).

The modification of the equipment will result in the following emission increase:

	Maximum Daily Emissions					
	<u>ROG</u>	<u>NO_x</u>	<u>PM₁₀</u>	<u>SO₂</u>	<u>CO</u>	<u>Pb</u>
Emission increase	0	0	0	0	4.48	0
MAX Limit (lb/day)	30	40	30	60	220	3
Compliance Status	Yes	Yes	Yes	Yes	Yes	Yes

No public notice is required since the emission increase is below the thresholds.

Rule 401: Visible emissions are not expected with the proper maintenance and operation of this equipment.

Rule 402: With proper maintenance and operation, this equipment is not expected to create a nuisance.

Rule 1303(a): The addition of natural gas injection to the RTOs has the potential to reduce the NOx emissions.

The RTOs will still be operating at the same temperature and destruction efficiencies will remain the same. Therefore, compliance with BACT for VOC is expected to be maintained.

The addition of natural gas injection will result in an increase in CO emissions. However, the CO concentrations are expected to remain at or around 4 ppm during natural gas injection which will meet BACT requirements.

Source testing is being required for all three oxidizers to verify the emissions during startup and natural gas injection.

Rules 1303(b)(1) modeling:

The hourly emission increases are as follows:

Mmbtu/hr	Table A-1	NOx	CO	PM10
>2 <5		0.31	17.1	1.9
C364		0	0.056	0
C455		0	0.092	0
C460		0	0.038	0

Compliance is expected.

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Rule 1303(b)(2) Offsets:

There is an increase of 4.48 lbs/day of CO emissions for this project due to the injection of natural gas. However, Since CO is an attainment air contaminant, offsets are not required.

Rule 1303(b)(4): The facility is expected to be in full compliance with all applicable rules and regulations of the District.

Rule 1401: The addition of natural gas injection will not trigger the requirement of this rule since no increase in toxic emissions is expected by this modification. Compliance with this rule is expected.

REG XX: Northrop is a cycle 1 NOx RECLAIM facility. The proposed project is not expected to increase the NOx emissions from the oxidizers. There is a potential for NOx emission decrease by the injection of natural gas. However, a source test is being required to determine any increase or decrease in NOx emissions due to the injection of natural gas.

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
NOx*	40
PM10	30
SOx*	60
CO	220

* Not applicable if this is a RECLAIM pollutant

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

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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 6th permit revision to the Title V renewal permit issued to this facility on September 7, 2011. 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 _x *	PM10	SO _x	CO
Previous Permit Revision Total Cumulative to date. Title V permit renewed Sept.7, 2011	0	0	0	0	0	1
6 th Permit Revision	0	0	0	0	0	4
Cumulative Total	0	0	0	0	0	5
Maximum Daily	30	30	40*	30	60	220

* RECLAIM pollutant, not subject to emission accumulation requirements

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_x 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. The proposed modifications is not expected to result in a NO_x emission increase, 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 a “minor permit revision”, for RECLAIM pollutant, 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.

Conclusion:

This equipment will operate in compliance with all District Rule and Regulations. A Permit to Construct is recommended for application number 554808-810 subject to preceding conditions.