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| SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT | PAGES 8 | PAGE 1 |
| ENGINEERING AND COMPLIANCE | 534122-4 | DATE 04/09/12 |
| PERMIT APPLICATION EVALUATION AND CALCULATIONS | PROCESSED BY AED | CHECKED |

**PERMIT TO CONSTRUCT EVALUATION
(Laser Cutter, 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: 534124 (De minimis Significant Permit Revision)

SECTION H: PERMITS TO CONSTRUCT

EQUIPMENT DESCRIPTION:

| Equipment | ID No. | Connected To | Source Type/ Monitoring Unit | Emissions | Conditions |
|--|--------|------------------|---------------------------------|--------------------------|--|
| Process 20: LASER CUTTING | | | | | |
| CUTTER, R&D PROTOTYPE, LASER, MODEL NO. YLP-1/100/20, 220 WATTS MAXIMUM Reference: A/N: 543123 | D248 | C264 | | PM: [RULE 405, 2-7-1986] | B59.12, C1.20, D323.1, E57.1, E147.1, E193.2 |
| DUST COLLECTOR, TWO STAGE FILTER CONSISTING: PRE-FILTER, DAYTON, 3AA31, ¾ HP, FILTER, FUMEX, FA5, WITH MAX 95 SQ. FT DEEP PLEATED DIMPLED FILTER, AND 1 HEPA FINAL FILTER A/N: 523906 Reference:A/N: 534122 | C264 | D248, D253, D260 | | PM: [RULE 404, 2-7-1986] | A63.21, C6.19, D29.1, D90.2, D322.4, D381.2, E102.1, E175.2, E193.2, <u>E193.3</u> , H23.14, K67.1 |

Laser Cutter # 1 Conditions:

Please note the changes to the conditions, the strikethrough are deletions and the underlined items are additions.

B59.12The operator shall not use the following materials in this device:

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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 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.

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.

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

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- 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.

Dust Collector Conditions:

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 4.5 inches water column.

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

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

D29.1 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 |
|--|--------------------------|----------------------------------|-------------------------------|
| PM10 emissions | Approved District Method | District-approved averaging time | Simultaneous inlet and outlet |
| Total hydrocarbon emissions | Approved District Method | District-approved averaging time | Simultaneous inlet and outlet |
| Polyunuclear Aromatic Hydrocarbons (PAH) | Approved District Method | District-approved averaging time | Simultaneous inlet and outlet |
| Cyanide emissions | Approved District Method | District-approved averaging time | Simultaneous inlet and outlet |

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A speciated analysis shall be conducted for organic compounds using GC/MS.

The speciated analysis shall be conducted for the inlet and outlet.

The source test shall be conducted no later than 210 days after the initial start-up of this equipment unless otherwise approved in writing by the District.

The test shall be conducted to determine the emissions of any toxic air contaminants and volatile organic compounds resulting from the laser cutting operation, the collection efficiency, and the control efficiency of the control equipment.

Two complete copies of source test protocol shall be submitted to the District engineer no later than 90 days after the initial start-up of this equipment unless otherwise approved in writing by the District. The test protocol shall be approved in writing by the District before the test commences.

The test protocol shall include, but not limited to, the proposed operating conditions of the equipment during the test, the identity of the testing laboratory, a statement from the testing laboratory certifying it meets the criteria in District Rule 304(k), and a description of the sampling and analytical procedures to be used.

A written notice of the source tests shall be submitted to the District engineer at least 14 days prior to source testing date so that an observer from the District may be present.

Two complete copies of source test reports shall be submitted to the District engineer within 45 days after the source testing date.

The source test report shall also include, exhaust flow rate, moisture content, O2 concentration, the number of panels used during the test, number of holes cut, and diameter and depth of each hole cut

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.

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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.

E175.2 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.

E193.3 The operator shall restrict operation of this equipment according to the following requirements; Only two out of three laser cutters Devices D248, D253, D260 shall be operated at any one time.

H23.14 This equipment is subject to the applicable requirements of the following rules or regulations:

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| 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/N 534123 to re-instate the cancelled Permit to Construct of R&D Laser Cutter #1, Device D248 (A/N 501000) issued on 10/30/09, A/N 534122 is for the modification of dust collector Device C264 by the additional venting of Laser Cutter #1, and A/N 534124 is submitted for TV permit Revision. Back in July 2011, the applicant erroneously requested cancelation of P/C for the Laser Cutter #1, D248 (see attachment). Subsequently the P/C was cancelled on 12/20/11. The applicant is also proposing to vent Laser Cutter #1 to air pollution control system C264. The air pollution control system C264 consists of a pre-filter, a pleated filter, and HEPA filter, and currently is venting two other R&D laser cutters D253 & D260.

This is a Title V/RECLAIM facility and the Title V renewal permit was issued to the facility on July 6, 2010. This project is the 3^{ed} permit revision since the issuance of the Title renewal V permit. There are no records of complaints or Notices of Violation issued to the facility during the last two years.

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 facility is requesting to re-instate the previously permitted Laser Cutter #1 (D248). The company will be operating Laser Cutter #1 in addition to the two existing Laser Cutter #2 (D253) & #3 (D260). All three laser cutting equipment are prototypes and are used to conduct preliminary testing and collecting necessary data for building much larger size equipment to be used for a full production in the future. The applicant is proposing to use laser cutter D260 as the primary cutter and only use laser cutters D253 & D248 as back-up units.

The configuration, operating hours and materials processed at existing R&D Laser Cutter No. 2 and No. 3 will be unchanged. Currently only Devices D253 & D260 are vented to air pollution control C264. The applicant is proposing to vent Laser Cutter #1 D248 to C264. After modification, all three laser

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cutters will be vented to C264. Per applicant request, only maximum two out of the three laser cutters will be operated at any one time. A permit condition will be placed on the permit for the dust collector C264 to limit operation to two laser cutters at any one time.

EMISSIONS CALCULATIONS:

Laser Cutter:

The laser cutter D248, previously constructed under P/C (A/N:501000) will be operated without any change to the configuration, operating hours, and material processed. PM10 and VOC emissions will be unchanged. The AEIS and NSR emissions will be entered as calculated in previous applications. The previous analysis, AEIS and NSR are located at the end of this evaluation.

PM10 Emissions:

Operating the laser cutter results in particulate matter emissions. For PM10 emission estimates, it is assumed that 99% of material removed will be PM10 emissions, the remaining 1% contributes to VOC emissions.

Processing rate = 10 panels per day, 1 panel per hour

PM10 control efficiency = 99.97%

Uncontrolled hourly PM10 emissions = 0.0459 lb/panel x 0.99 = 0.0454 lb/panel

Uncontrolled daily PM10 emissions = 0.0454 lb/panel x 10 panel/day = 0.454 lb/day

Controlled daily PM10 emissions = 0.454 lb/day x (1 - 0.9997) = 1.36 x 10⁻⁴ lb/day

Controlled hourly PM10 emissions = 1.36 x 10⁻⁵ lb/hr

VOC Emissions:

It is assumed that 1% of the material removed contributes to VOC emissions.

Processing rate = 10 panels per day, 1 panel per hour

Hourly VOC emissions = 0.0459 lb x 0.01 = 4.59 x 10⁻⁴ lb/panel

Daily VOC emissions = 4.59 x 10⁻⁴ lb/panel x 10 hr/day = 4.59 x 10⁻³ lb/day

Dust collector:

The facility will be venting the third laser cutter D248 to the existing air pollution control system Fumex FA5 C264. According to the technical data sheet, Fumex FA5 has large deep-pleated dimpled media pre-filter, HEPA filter, and bonded carbon technology. After modification, the dust collector will be venting two existing laser cutters Devices D253, D260, plus previously permitted D248.

A source test will be required to verify the control efficiency requirements of the air pollution control system.

TOXIC EVALUATION:

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According to applicant the facility continues to use 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 (acute) listed in the material safety data sheets for the test panels. Assuming that all of the VOC emission emitted during the cutting process is MEK, emissions are considered negligible and there will not be an acute health hazard risk from this project.

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 MEK emissions. However, the increase is negligible and there will not be an acute health hazard risk from this project.

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 proposed modifications will not result in an emission increase exceeding the daily maximums.

| | Maximum Daily Emissions | | | | | |
|--------------------|-------------------------|-----------------|------------------|-----------------|------------|----------|
| | ROG | NO _x | PM ₁₀ | SO ₂ | CO | Pb |
| Emission increase | 0 | 0 | 0 | 0 | 0 | 0 |
| MAX Limit (lb/day) | 30 | 40 | 30 | 60 | 220 | 3 |
| Compliance Status | Yes | Yes | Yes | Yes | Yes | Yes |

RULES 401 & 402: Particulate emissions from the laser cutter will be vented to an air pollution control system consisting of a prefilter, a panel filter, and a HEPA filter for particulate emission

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control and a carbon adsorber for VOC emission control. 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 534122) The flow rate from the multi-stage filtration control equipment is specified at 385 cfm. Particulate emissions for both laser cutters are:

Controlled hourly A/N 525295: PM10 emissions = 1.0×10^{-5} lbs/hr.

Controlled hourly A/N 525296 : PM10 emissions = 1.36×10^{-5} lb/hr

Controlled hourly A/N 534122 : PM10 emissions = 1.36×10^{-5} lb/hr

Total maximum PM emissions for two laser cutters at any one time: 2.72×10^{-5} lb/hr

$0.0000272 \text{ lbs/hr} \times 7000 \text{ grains/lb} \div (385 \text{ ft}^3/\text{min}) (60 \text{ min/hr}) = 0.000008 \text{ grains/ft}^3$

Rule 404 specifies that the particulate emission concentration for air flow rates of less than 883 cfm shall not exceed 0.196 grains/cf. 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. Potential PM10 emissions are controlled by 99.97%. VOC emissions are controlled by a carbon adsorber 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:
 - (A) an increased MICR greater than one in one million (1.0×10^{-6}) at any receptor location, if the permit unit is constructed without T-BACT;
 - (B) an increased MICR greater than ten in one million (1.0×10^{-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.

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- 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, the MEK emissions from the laser 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:

| <u>Air Contaminant</u> | <u>Daily Maximum (lbs/day)</u> |
|------------------------|--------------------------------|
| HAP | 30 |
| VOC | 30 |
| NO _x * | 40 |
| PM ₁₀ | 30 |
| SO _x * | 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 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 3rd. 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:

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| Revision | HAP | VOC | NO _x * | PM10 | SO _x | CO |
|---|-----|-----|-------------------|------|-----------------|-----|
| Previous permit Revisions. | 0 | 0 | 1* | 0 | 0 | 1 |
| 3 rd Permit Revision Construction (re-instate) previously permitted laser cutter D248, modification of baghouse Device ID# C264 (venting laser cutter D248). | 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_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. However, the proposed changes will not result in an increase in NO_x 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 3003(j). If EPA does not raise any objections within the review period, a revised Title V permit will be issued to this facility.