



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

March 4, 2010

Mr. Gerardo C. Rios
Chief, Permit Office
US EPA Region IX Air 3
75 Hawthorne Street
San Francisco, CA 94105-3901

Dear Mr. Rios:

Subject: Schlosser Forge Company – I.D. No. 15504, Title V Permit Modification

Schlosser Forge Company has proposed to revise their Title V permit by modifying their forge furnace D 58 by replacing an existing burner with two new burners.

This is a rolled ring and forge product manufacturing facility (SIC 3460) located at 11711 Arrow Route, Rancho Cucamonga, CA 91730. This proposed permit revision, requested in their Application No. 504091, is considered as a “de minimis significant permit revision” to their Title V permit. Enclosed for your review are the permit evaluation and the proposed Section H. With your receipt of the proposed Title V permit revision today, we will note that the EPA 45-day review period begins on March 4, 2010.

If you have any questions or need additional information regarding the proposed permit revision, please contact Mr. Kien Huynh at (909) 396-2635.

Sincerely,

A handwritten signature in black ink, appearing to read "Brian L. Yeh", written over a light blue horizontal line.

Brian L. Yeh
Senior Manager
Chemical/Mechanical Operations

BLY:kh

Enclosures

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Applicant's Name: Schlosser Forge Co.
Mailing Address: 11711 Arrow Route
 Rancho Cucamonga, CA 91730

Equipment Location: Same

Equipment Description:

APPLICATION NO. 504092: D58

ALTERATION TO FORGE FURNACE PERMIT TO OPERATE F24391 (A/N 360929), DEVICE D58, BY:

THE REMOVAL OF:

- ONE HAUCK BURNER, NATURAL GAS-FIRED, 3,000,000 BTU/HR

AND THE ADDITION OF:

- TWO MAXON BURNERS, MODEL KINEDIZER LE, NATURAL GAS-FIRED, EACH 1,500,000 BTU/HR

HISTORY:

Application(s) received on: 12/9/09

Equipment modified: No

Violations recorded: 3 Notices to Comply have been issued in the last 2 years. All concerns pertaining to the notices have been resolved.

The application was filed to modify the equipment by replacing one 3 MM BTU/hr existing Hauck burner with two 1.5 MM BTU/hr Maxon burners (3 MM BTU/hr total).

The proposed burners are guaranteed to meet the existing NOx limit of 50 ppm @ 3% O₂.

PROCESS DESCRIPTION

The equipment is for preheating metal for forging.

It is fueled with natural gas.

CALCULATIONS:

CALCULATIONS:

Given:

	<u>Proposed</u>	<u>Existing</u>
Maximum Heat Input Rating, MM BTU/hr:	3	3
Fuel:	Natural gas	
Equipment Operating Load:	100%	
Conversion Factors, ppm @ 3% O ₂ to lb/MM BTU		
NOx	0.00121	
CO	0.00074	

Operating Schedule:

hrs/day	24
days/wk	7
weeks/yr	52

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	<u>Proposed</u>	<u>Existing</u>
NOx Concentration, ppm @ 3% O ₂ (dry)	50	50

CO Concentration, ppm @ 3% O₂ (dry)

Emission Factors, lb/MM (Default)

ROG:	0.0067
SO _x :	0.0008
CO:	0.0333
PM:	0.0071
PM ₁₀ in total PM:	100%
HHV of natural gas:	1,050 BTU/ft ³
CO limit?	No

Computations:

VOC:

lb/hr	0.0067 lb/MM BTU*3 MM BTU =	0.02 lb/hr
lb/day Max.	0.02 lb/hr*24 hrs/day =	0.48 lb/day Max.
lb/day, Avg	0.02 lb/hr*24 hrs/day*1.00 (Load factor) =	0.48 lb/day, Avg
lb/yr	0.48 lb/day*7 days/wk*52 wks/yr =	174.72 lb/yr

NOx:

lb/MM BTU	0.00121 lb/MM BTU-ppm*50 ppm =	0.0607 lb/MM BTU
lb/hr	0.0607 lb/MM BTU*3 MM BTU/hr =	0.18 lb/hr
lb/day Max.	0.18 lb/hr*24 hrs/day =	4.37 lb/day Max.
lb/day, Avg	0.18 lb/hr*24 hrs/day*1.00 (Load factor) =	4.37 lb/day, Avg
lb/yr	4.37 lb/day*7 days/wk*52 wks/yr =	1590.90 lb/yr

SOx:

lb/hr	0.0008 lb/MM BTU*3 MM BTU =	0.002 lb/hr
lb/day Max.	0.002 lb/hr*24 hrs/day =	0.06 lb/day Max.
lb/day, Avg	0.002 lb/hr*24 hrs/day*1.00 (Load factor) =	0.06 lb/day, Avg
lb/yr	0.06 lb/day*7 days/wk*52 wks/yr =	20.72 lb/yr

CO:

lb/hr	0.0333 lb/MM BTU*3 MM BTU =	0.10 lb/hr
lb/day Max.	0.10 lb/hr*24 hrs/day =	2.40 lb/day Max.
lb/day, Avg	0.10 lb/hr*24 hrs/day*1.00 (Load factor) =	2.40 lb/day, Avg
lb/yr	2.40 lb/day*7 days/wk*52 wks/yr =	873.60 lb/yr

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PM/PM10

lb/hr 0.0071 lb/MM BTU*3 MM BTU = 0.02 lb/hr
 lb/day Max. 0.02 lb/hr*24 hrs/day = 0.51 lb/day Max.
 lb/day, Avg 0.02 lb/hr*24 hrs/day*1.00 (Load factor) = 0.51 lb/day, Avg
 lb/yr 0.51 lb/day*7 days/wk*52 wks/yr = 187.20 lb/yr

	VOC	NOx	SOx	CO	PM/PM10
Factor (lb/MM BTU)	0.0067	0.0607	0.0008	0.0333	0.0071
lb/hr	0.02	0.18	0.002	0.10	0.02
lb/day Max.	0.48	4.37	0.06	2.40	1
Avg.	0.48	4.37	0.06	2.40	0.51
lb/yr	174.72	1,590.90	20.72	873.60	187.20

Emission limits (For Condition A63):

VOC: 0.48 lb/day*30 days/month = 14.40 lb/month
 SOx 0.06 lb/day*30 days/month = 1.71 lb/month
 CO 2.40 lb/day*30 days/month = 72.00 lb/month
 PM10 0.51 lb/day*30 days/month = 15.43 lb/month

Recorded emissions for A/N 360929: (From NSR accounts)

	RHC	NOx	SOx	CO	PM/PM10
lb/hr	0.02	0.18	-	0.59	0.05
lb/day Max	0.48	4.32	-	14.16	1.20
lb/day 30-day Avg.	0	4.00	-	14.00	1.00
lb/yr	174.72	1,572.48	-	5,154.24	436.80

Emission discrepancies discussions:

VOC & NOx: The difference between the emissions in NSR accounts for the previous A/N 360929 and those that are currently calculated are due to rounding off.

SOx: SOx emissions were not previously calculated for A/N 360929.

CO and PM10: The differences between the emissions in NSR accounts for the previous A/N 360929 and those that are currently calculated are due to the use of different emission factors. The current CO and PM10 emissions are based on the currently approved CO and PM emission factors and believed to be more accurate.

Emission impacts conclusion: There are no emission impacts.

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RULES EVALUATION

Rule 212:

(c) (1): Emissions near a school

This is not a significant project as defined by this rule. No public notice is required (The nearest school is 6336 feet from the equipment).

(c) (2): On-site emission increases exceeding the daily maximums

There is no emission increase due to the modification. This is not a project requiring notification as described in this paragraph.

(c) (3): Emissions of toxic air contaminants

There is no emission increase due to the modification. This is not a project requiring notification as described in this paragraph.

(g): Emission increases exceeding the daily maximums

There is no emission increase due to the modification. This is not a project subject to the notification requirements of subdivision (g) of this rule.

Rule 401:

No visible emissions are expected from this type of equipment. Compliance is expected.

Rule 402:

Nuisance problems due to the operation of this equipment are unlikely.

Rule 404:

Combustion of natural gas does not generate a significant amount of PM emission. Compliance is expected

Rules 407/409:

This equipment is fired with natural gas. Compliance is expected.

REGULATION XIII - New Source Review

There is no emission increase due to the modification, NSR is not applicable.

Rule 1401:

There is no increase in toxic air contaminants due to the modification, this rule is not applicable.

Rule 2005 - New Source Review for RECLAIM

There is no emission increase due to the modification, this rule is not applicable.

Note: The new burners meet current BACT (50 ppm NOx @ 3% O₂).

DISCUSSIONS

Based on information submitted with the application and the above evaluation, it is determined that the equipment will operate in compliance with all the applicable rules and regulations of the District.

RECOMMENDATIONS

APPLICATION NO. 504092:

Issue Permit to Construct subject to permit conditions as stated in Section H.

FACILITY PERMIT TO OPERATE SCHLOSSER FORGE COMPANY

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: FORGING/HEAT TREATING					
FURNACE, FORGE, F-4006, NATURAL GAS, WITH RECUPERATOR, WITH LOW NOX BURNER, 3 MMBTU/HR WITH A/N: BURNER, NATURAL GAS, MAXON, MODEL KINEDIZER LE, WITH LOW NOX BURNER, 2 TOTAL; 1.5 MMBTU/HR	D58		NOX: PROCESS UNIT**	CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; NOX: 50 PPMV NATURAL GAS (3) [RULE 2012, 5-6-2005]; PM: (9) [RULE 404, 2-7-1986]; PM: 0.1 GRAINS/SCF NATURAL GAS (5) [RULE 409, 8-7-1981]	A63.5, B59.1, D12.1, D28.1, D28.4, K40.1

* (1) (1A) (1B) Denotes RECLAIM emission factor
 (3) Denotes RECLAIM concentration limit
 (5) (5A) (5B) Denotes command and control emission limit
 (7) Denotes NSR applicability limit
 (9) See App B for Emission Limits
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (4) Denotes BACT emission limit
 (6) Denotes air toxic control rule limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

**FACILITY PERMIT TO OPERATE
SCHLOSSER FORGE COMPANY**

SECTION H: DEVICE ID INDEX

**The following sub-section provides an index
to the devices that make up the facility
description sorted by device ID.**

**FACILITY PERMIT TO OPERATE
SCHLOSSER FORGE COMPANY**

SECTION H: DEVICE ID INDEX

Device Index For Section H			
Device ID	Section H Page No.	Process	System
D58	1	1	0

FACILITY PERMIT TO OPERATE SCHLOSSER FORGE COMPANY

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

FACILITY CONDITIONS

F9.1 Except for open abrasive blasting operations, the operator shall not discharge into the atmosphere from any single source of emissions whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is:

(a) As dark or darker in shade as that designated No.1 on the Ringelmann Chart, as published by the United States Bureau of Mines; or

(b) Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subparagraph (a) of this condition.

[RULE 401, 3-2-1984; RULE 401, 11-9-2001]

F14.1 The operator shall not use fuel oil containing sulfur compounds in excess of 500 ppm by weight.

[RULE 431.2, 5-4-1990; RULE 431.2, 9-15-2000]

F14.2 The operator shall not purchase diesel fuel containing sulfur compounds in excess of 15 ppm by weight as supplied by the supplier.

[RULE 431.2, 9-15-2000]

F24.1 Accidental release prevention requirements of Section 112(r)(7):

a). The operator shall comply with the accidental release prevention requirements pursuant to 40 CFR Part 68 and shall submit to the Executive Officer, as a part of an annual compliance certification, a statement that certifies compliance with all of the requirements of 40 CFR Part 68, including the registration and submission of a risk management plan (RMP).

b). The operator shall submit any additional relevant information requested by the Executive Officer or designated agency.

[40CFR 68 - Accidental Release Prevention, 5-24-1996]

FACILITY PERMIT TO OPERATE SCHLOSSER FORGE COMPANY

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

DEVICE CONDITIONS

A. Emission Limits

A63.5 The operator shall limit emissions from this equipment as follows:

CONTAMINANT	EMISSIONS LIMIT	Header 3	Header 4
CO	Less than or equal to	72	LBS IN ANY ONE MONTH
PM10	Less than or equal to	15.43	LBS IN ANY ONE MONTH
ROG	Less than or equal to	14.4	LBS IN ANY ONE MONTH
SOX	Less than or equal to	1.71	LBS IN ANY ONE MONTH

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D58]

B. Material/Fuel Type Limits

B59.1 The operator shall not use the following material(s) in this device :

Metal contaminated with rubber, plastic, paper, rags, oil, grease

Smoke producing material

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002; RULE 401, 3-2-1984; RULE 401, 11-9-2001]

FACILITY PERMIT TO OPERATE SCHLOSSER FORGE COMPANY

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

[Devices subject to this condition : D58]

D. Monitoring/Testing Requirements

D12.1 The operator shall install and maintain a(n) non-resettable totalizing fuel meter to accurately indicate the fuel usage of the furnace.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002; RULE 2012, 5-6-2005]

[Devices subject to this condition : D58]

D28.1 The operator shall conduct source test(s) in accordance with the following specifications:

The test shall be conducted to determine the NOX emissions at the outlet.

The test shall be conducted every five-year period, with the first five-year period ending on June 30, 2005.

The test shall be conducted within 12 months of the approval of the NOx concentration limit.

[RULE 2012, 5-6-2005]

[Devices subject to this condition : D58]

D28.4 The operator shall conduct source test(s) in accordance with the following specifications:

FACILITY PERMIT TO OPERATE SCHLOSSER FORGE COMPANY

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

The test shall be conducted to simultaneously determine NO_x and CO, in ppmv at 3% oxygen, at the outlet.

The test shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up.

The District shall be notified of the date and time of the test at least 10 days prior to the test.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002; RULE 2005, 5-6-2005]

[Devices subject to this condition : D58]

K. Record Keeping/Reporting

K40.1 The operator shall provide to the District a source test report in accordance with the following specifications:

NO_x source test results shall be submitted to the District no later than 45 days after the test was conducted.

NO_x emissions shall be expressed in terms of ppmv on a dry basis corrected to 3% oxygen.

[RULE 2012, 5-6-2005]

[Devices subject to this condition : D58]