

South Coast Air Quality Management District

Statement of Basis

Proposed Title V Renewal Permit

Facility Name:	Honeywell International Inc
Facility ID:	800003
SIC Code:	3764
Equipment Location:	2525 West 190 th Street Torrance, CA 90504
Application #(s):	568122
Application Submittal Date(s):	09/05/14
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1. Introduction and Scope of Permit

Title V is a national operating permit program for air pollution sources. Facilities subject to Title V must obtain a Title V permit and comply with specific Title V procedures to modify the permit. This permit replaces the facility's other existing permits. Title V does not necessarily include any new requirements for reducing emissions. It does, however, include new permitting, noticing, recordkeeping, and reporting requirements.

Pursuant to Title V of the federal Clean Air Act and SCAQMD Rule 3004(f), a Title V permit shall expire five years from the date of issuance unless such permit has been renewed. Accordingly, each facility is required to submit a Title V renewal application and requested the SCAQMD to renew their Title V permit. The proposed permit incorporates updates to the facility information provided in the facility's Title V renewal application and all rules and regulations that are currently applicable to the facility.

The SCAQMD implements Title V through Regulation XXX – Title V Permits, adopted by the SCAQMD Governing Board in order to comply with EPA's requirement that local air permitting authorities develop a Title V program. Regulation XXX was developed with the participation of the public and affected facilities through a series of public workshops, working group meetings, public hearings and other meetings.

The Title V major source threshold for a particular pollutant depends on the attainment status of the pollutant. NO₂, SO₂, and CO are in attainment with federal standards. The status of lead is

nonattainment. The status for PM-10 is serious nonattainment. The status for ozone is currently extreme nonattainment.

A Title V renewal permit is proposed to be issued to cover the operations of Honeywell International Inc located at 2525 West 190th Street, Torrance, CA 90504. This facility is subject to Title V requirements because it is a major source.

2. Facility Description

This is an existing facility that is in the business of aerospace manufacturing. The facility operates spray booths, dip tanks, ovens, surface preparation tanks, salt brazing tanks, air heaters, boilers, internal combustion engines, jet engine test cells, plasma arc cutting equipment, air pollution control equipment including scrubbers, afterburners, a baghouse, a carbon adsorption system, and other supporting equipment.

3. Construction and Permitting History

The facility has been in constant operation with a Title V permit at this location since 1999. Numerous permits to construct and or permits to operate have been issued to the facility since September 1999. A Title V renewal permit was issued to the facility on March 25, 2010.

4. Regulatory Applicability Determinations

Applicable legal requirements for which this facility is required to comply are required to be identified in the Title V permit (for example, Section D, E, and H of the proposed Title V permit). Applicability determinations (i.e., determinations made by the District with respect to what legal requirements apply to a specific piece of equipment, process, or operation) can be found in the Engineering Evaluations. This facility is not subject to any NSPS Requirements. However, the facility is subject to the requirements of 40CFR63 Subpart GG-National Emission Standards for Hazardous Air Pollutants: Aerospace Manufacturing and Rework Facilities. The requirements of this NESHAP are reflected in the Title V permit.

The facility is an area source under 40CFR63 Subpart ZZZZ-National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines. There are two compression ignition emergency engines at the facility that are considered existing engines under this NESHAP because they were installed before June 12, 2006. The requirements of this NESHAP such as changing the oil and filter, inspecting the air cleaner, inspection of all hoses and belts, installation of a non-resettable hour meter, maintaining the engine according to the manufacturer's specification, and reporting and recordkeeping requirements are specified in the permit.

Further, the facility operates a chrome conversion tank that is subject to the requirements of 40CFR63 Subpart WWWW- National Emission Standards for Hazardous Air Pollutants: Plating and Polishing operations. The facility complies with this NESHAP by venting the tank to an air pollution control system scrubber and the requirements of this NESHAP are reflected in the permit.

5. Monitoring and Operational Requirements

Applicable monitoring and operational requirements for which the facility is required to comply are identified in the Title V permit (for example, Section D, F, and J and Appendix B of the proposed Title V permit). Discussion of any applicable operational requirements can be found in the Engineering Evaluations. All periodic monitoring requirements were developed using strict adherence to the following applicable guidance documents: SCAQMD Periodic Monitoring Guidelines for Title V Facilities (November 1997); CAPCOA/CARB/EPA Region IX Periodic Monitoring Recommendations for Generally Applicable Requirements in SIP (June 1999); and CAPCOA/CARB/EPA Region IX Recommended Periodic Monitoring for Generally Applicable Grain Loading Standards in the SIP: Combustion Sources (July 2001).

Volatile organic compound (VOC) emissions from two spray booths and two dip tanks are vented to an air pollution control equipment carbon adsorption system. The uncontrolled VOC emissions to the air pollution control system is greater than the major source threshold for VOC of 10 tons per year. However, since this operation is subject to the requirements of 40CFR63 Subpart GG-National Emission Standards for Hazardous Air Pollutants: Aerospace Manufacturing and Rework Facilities, the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 is not applicable to the carbon adsorption system.

The VOC emissions from several test cells are vented to air pollution control equipment afterburners. However, since the VOC emissions vented to each afterburner is less than 10 tons per year, the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 is not applicable to the afterburners.

PM emissions from the surface preparation lines are vented to several air pollution control equipment scrubbers. In addition, the PM emissions from a plasma arc cutter are vented to an air pollution control equipment baghouse. However, since the PM10 emission vented to each scrubber and the baghouse is less than 70 tons per year, the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 is not applicable to the scrubbers or the baghouse.

6. Permit Features

Permit Shield

A permit shield is an optional part of a Title V permit that gives the facility an explicit protection from requirements that do not apply to the facility. A permit shield is a provision in a permit that states that compliance with the conditions of the permit shall be deemed compliance with all identified regulatory requirements. To incorporate a permit shield into the Title V permit involves submission of applications for change of conditions for each equipment affected by the permit shield. Permit shields are addressed in Rule 3004 (c). This facility has not applied for a permit shield.

Streamlining Requirements

Some emission units may be subject to multiple requirements which are closely related or redundant. The conditions may be streamlined to simplify the permit conditions and compliance. Emission limits, work practice standards, and monitoring, recordkeeping, and reporting requirements may be streamlined. Compliance with a streamlined condition will be deemed

compliance with the underlying requirements whether or not the emission unit is actually in compliance with the specific underlying requirement. This facility has not applied for any streamlined conditions.

7. Summary of Emissions and Health Risks

**Criteria Pollutant Emissions (tons/year)
Annual Reported Emissions for Reporting Period 2013**

Pollutant	Emissions (tons/year)
NOx	3.567
CO	3.478
VOC	2.653
PM	1.996
SOx	0.035

**Toxic Air Contaminants Emissions (TAC)
Annual Reported Emissions for Reporting Period 2013**

The Following TACs Were Reported	Emissions (lbs/yr)
Ammonia	2021.935
Arsenic	0.078
Asbestos	0.015
Benzene	1.556
Cadmium	0.008
Chromium (VI)	0.004
Formaldehyde	7.017
Lead	0.15
Naphthalene	0.175
Nickel	13.812
PAH's	0.029

Health Risk from Toxic Air Contaminants

The facility is subject to review by the Air Toxics Information and Assessment Act (AB2588). The Final Facility Health Risk was approved in 1999 with the following risk factors.

Cancer Risk	1.77 in one million
Acute Hazard Index	0.0
Chronic Hazard Index	0.01

8. Compliance History

As noted, the facility has been in constant operation with a Title V permit since 1999. The facility has been subject to both self-reporting requirements and SCAQMD inspections. The

facility has had no citizen complaints, Notices to Comply or Notices of Violation issued in the last two years. The facility is currently operating in compliance with all applicable rules and permit conditions.

9. Compliance Certification

By virtue of the Title V permit application and issuance of this Title V renewal permit, the reporting frequency for compliance certification for the facility shall be annual.