

 SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING & COMPLIANCE DIVISION APPLICATION PROCESSING AND CALCULATIONS	PAGES 5	PAGE 1
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	PROCESSED BY E. DELA CRUZ	CHECKED BY D. GORDON

EVALUATION REPORT FOR PERMIT TO OPERATE

COMPANY NAME: DUNN-EDWARDS CORP.

FACILITY ID: 13943

MAILING ADDRESS: 4885-4979 E. 52nd Place
Los Angeles, CA 90040-2807

EQUIPMENT LOCATION: Same as above

EQUIPMENT DESCRIPTION:

A/N 481510 – Title V Facility Permit Amendment

A/N 475434:

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 3 : AIR POLLUTION CONTROL SYSTEMS					
System 1 : BAGHOUSES					
BAGHOUSE ENVIROSYSTEMS, MODEL NO. ECO2 BIN VENT, 55 SQ. FT. 2 CARTRIDGE FILTERS, WITH 1.675 HP. BLOWER A/N: 481498	C157	D25 D26		PM: (9) [RULE 404, 2-7-1986, RULE 405, 2-7-1986]	C6.4 D322.2 D381.1 E102.1 K67.3
BAGHOUSE ENVIROSYSTEMS, MODEL NO. ECO2 BIN VENT, 55 SQ. FT. 2 CARTRIDGE FILTERS, WITH 1.675 HP. BLOWER A/N: 481499	C158	D32		PM: (9) [RULE 404, 2-7-1986, RULE 405, 2-7-1986]	C6.4 D322.2 D381.1 E102.1 K67.3
BAGHOUSE ENVIROSYSTEMS, MODEL NO. ECO2 BIN VENT, 55 SQ. FT. 2 CARTRIDGE FILTERS, WITH 1.675 HP. BLOWER A/N: 481500	C159	D42 D43		PM: (9) [RULE 404, 2-7-1986, RULE 405, 2-7-1986]	C6.4 D322.2 D381.1 E102.1 K67.3
BAGHOUSE ENVIROSYSTEMS, MODEL NO. ECO2 BIN VENT, 55 SQ. FT. 2 CARTRIDGE FILTERS, WITH 1.675 HP. BLOWER A/N: 481501	C160	D48 D49		PM: (9) [RULE 404, 2-7-1986, RULE 405, 2-7-1986]	C6.4 D322.2 D381.1 E102.1 K67.3
BAGHOUSE ENVIROSYSTEMS, MODEL NO. ECO2 BIN VENT, 55 SQ. FT. 2 CARTRIDGE FILTERS, WITH 1.675 HP. BLOWER A/N: 481502	C161	D53 D54		PM: (9) [RULE 404, 2-7-1986, RULE 405, 2-7-1986]	C6.4 D322.2 D381.1 E102.1 K67.3
BAGHOUSE ENVIROSYSTEMS, MODEL NO. ECO2 BIN VENT, 55 SQ. FT. 2	C162	D58 D59		PM: (9) [RULE 404, 2-7-1986, RULE 405, 2-7-1986]	C6.4 D322.2 D381.1 E102.1

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CARTRIDGE FILTERS, WITH 1.675 HP. BLOWER A/N: 481503					K67.3
BAGHOUSE ENVIROSYSTEMS, MODEL NO. ECO2 BIN VENT, 55 SQ. FT. 2 CARTRIDGE FILTERS, WITH 1.675 HP. BLOWER A/N: 481504	C163	D94		PM: (9) [RULE 404, 2-7-1986, RULE 405, 2-7-1986]	C6.4 D322.2 D381.1 E102.1 K67.3
BAGHOUSE ENVIROSYSTEMS, MODEL NO. ECO2 BIN VENT, 55 SQ. FT. 2 CARTRIDGE FILTERS, WITH 1.675 HP. BLOWER A/N: 481508	C164	D99		PM: (9) [RULE 404, 2-7-1986, RULE 405, 2-7-1986]	C6.4 D322.2 D381.1 E102.1 K67.3
BAGHOUSE SCIENTIFIC DUST, MODEL NO. MPL-2BV, 70 SQ. FT. 2 CARTRIDGE FILTERS, WITH 270 CFM BLOWER A/N: 481506	C165	D106		PM: (9) [RULE 404, 2-7-1986, RULE 405, 2-7-1986]	C6.4 D322.2 D381.1 E102.1 E202.1 K67.3
BAGHOUSE SCIENTIFIC DUST, MODEL NO. MPL-2BV, 70 SQ. FT. 2 CARTRIDGE FILTERS, WITH 270 CFM BLOWER A/N: 481509	C166	D107		PM: (9) [RULE 404, 2-7-1986, RULE 405, 2-7-1986]	C6.4 D322.2 D381.1 E102.1 E202.1 K67.3

- | | |
|--|--|
| * (1) Denotes RECLAIM emission factor | (2) Denotes RECLAIM emission rate |
| (3) Denotes RECLAIM concentration limit | (4) Denotes BACT emissions limit |
| (5)(5A)(5B) Denotes command & control emission limit | (6) Denotes air toxic control rule limit |
| (7) Denotes NSR applicability limit | (8)(8A)(8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc) |
| (9) See App B for Emission Limits | (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.

C. Throughput or Operating Parameter Limits

C6.4 The operator shall use this equipment in such a manner that the differential pressure being monitored, as indicated below, does not exceed 3 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 bags. The operator shall determine and record the parameter being monitored once every week.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition: C157, C158, C159, C160, C161, C162, C163, C164, C165, C166]

D. Monitoring/Testing Requirements

D322.2 The operator shall perform an annual inspection of the equipment and filter media for leaks, broken or torn filter media and improperly installed filter media.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition: C157, C158, C159, C160, C161, C162, C163, C164, C165, C166]

D381.1 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, an 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 eliminates 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.

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A. Stack or emission point identification;

B. Description of any corrective actions taken to abate visible emissions; and

C. Date and time visible emission was abated.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition: C157, C158, C159, C160, C161, C162, C163, C164, C165, C166]

E. Equipment Operation/Construction Requirements

E102.1 The operator shall discharge dust collected in this equipment only into closed containers.

[RULE 3004(a)(4)-Periodic Monitoring , 12-12-1997]

[Devices subject to this condition: C157, C158, C159, C160, C161, C162, C163, C164, C165, C166]

E202.1 The operator shall clean and maintain this equipment according to the following specifications:

Dust collected in the baghouse shall be recycled back into the dump hopper(s).

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition: C165, C166]

K. Record Keeping/Reporting

K67.3 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 dust collector.

The date, time and results of the inspection.

The date, time and description of any maintenance or repairs resulting from the inspection.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition: C157, C158, C159, C160, C161, C162, C163, C164, C165, C166]

BACKGROUND/PROCESS DESCRIPTION:

Dunn-Edwards Corp. is a coatings manufacturing facility. This facility is under Title V program. NSR database shows the following emissions:

Pollutant	Daily Emissions
CO	0 lb/day
PM ₁₀	45 lb/day
NO _x	1 lb/day
ROG	13 lb/day
SO _x	0 lb/day

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The company submitted eleven applications on April 15, 2008 which includes a Title V Facility Permit Amendment and ten Class I applications for ten baghouses. The ten baghouses will replace three permitted baghouses (C140, C143, and C152). The baghouses will vent thirteen paint mixers and two dump hoppers. The installation of ten baghouses and removal of three baghouses will not result in an increase of emissions.

EMISSION CALCULATIONS:

Operating Data:

Average operation	18 hrs/day	5 days/wk	52 wk/yr
Maximum operation	18 hrs/day	6 days/wk	52 wk/yr
Control efficiency	99%		

The ten pieces of equipment are all control devices, therefore there are no emissions.

RULES EVALUATION:

- Rule 212: Standards for Approving Permits** – A public notice is triggered when the permitted equipment is within 1,000 feet of the outer boundary of a school, the emissions exceed the daily maximum in section (g), or when the MICR is greater than one in a million. Since, there are no schools within 1,000 feet, and emissions and MICR are below the limits, a Public Notice is not required.
- Rule 401: Visible Emissions** – No visible emissions is expected if the equipment is well maintained and properly operated. Therefore, compliance with this rule is expected.
- Rule 402: Public Nuisance** – Operation of this equipment is not expected to create any nuisance problem. Compliance with this rule is expected.
- Rule 404: Particulate Matter – Concentration** – Particulate matter emission is expected to be negligible during operation. Emissions will be less than the standard set forth in Table 404(a); therefore, compliance with this rule is expected.
- Rule 405: Solid Particulate Matter – Weight** – Compliance with this rule is expected since the calculated PM emission is 0.089 lb/hr, which is lower than the lowest allowable limit for solid particulate matter (Table 405(a) – 0.99 lb/hr).
- Reg. XIII: New Source Review – (BACT)** – The ten pieces of equipment are control devices, therefore BACT is not required.

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Modeling – The ten baghouses do not emit any emissions, therefore compliance with this rule is expected.

POLLUTANT	ALLOWABLE EMISSIONS (LBS/HR)	CALCULATED EMISSIONS (LBS/HR)
NO _x	0.068	NA
CO	3.7	NA
PM ₁₀	0.41	NA

Offsets – There is no increase in any of the criteria pollutants, therefore compliance with this rule is expected.

Criteria Pollutants	Allowed emissions (lb/day)	Current emissions (lb/day)	Additional emissions (lb/day)	New emissions (lb/day)
NO _x	22	1	0	1
ROG	22	13	0	13
SO _x	22	0	0	0
PM ₁₀	22	45	0	45
CO	159	0	0	0

Rule 1401: New Source Review of Toxic Air Contaminants – There is no toxic air contaminant associated with the installation of the ten baghouses. Compliance with this rule is expected.

CONCLUSIONS & RECOMMENDATIONS:

The ten baghouses will meet all District rules and regulations. I recommend issuing Permits to Construct/Operate.