

South Coast Air Quality Management District

Statement of Basis

Proposed Title V Permit Renewal

Facility Name: Cambro Manufacturing Co.
Facility ID: 8309
SIC Code: 3089
Equipment Location: 7601 Clay Avenue
Huntington Beach, CA 92648

Application #(s): 557730

Application Submittal Date(s): 10/30/2013

SCAQMD Contact Person: Stephen Jiang
Phone Number: (909) 396-3134
E-Mail Address: sjiang@aqmd.gov

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. This permit replaces the facility's 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 request 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, CO, and PM₁₀ are in attainment with federal standards. The status for lead is nonattainment. The status for ozone is currently extreme nonattainment.

A Title V permit is proposed to be issued to cover the operations of Cambro Manufacturing Co., 7601 Clay Avenue, Huntington Beach, CA 92648. This facility is subject to Title V requirements because it is a major source.

2. Facility Description

Cambro Manufacturing Co. is an existing Title V facility that manufactures a variety of plastic products for the commercial food services industry. This facility manufactures plastic products through the use of injection molding, compression molding and pultrusion molding techniques. This facility operates one internal combustion engine to generate compressed air, two silkscreen printing electric drying ovens, one burn-off furnace to burn off residual plastics from injection nozzles, four plastic size reduction grinders, one portable plasma arc cutter and other supporting equipment. The VOC emissions from the burn-off oven are being controlled by an afterburner. The PM emissions from the main plastic grinder are being controlled by a cyclone and four bag filters. The PM emissions from the other three plastic grinders are being controlled by three cyclones and a dust collector.

3. Construction and Permitting History

The facility has been in operation with a Title V permit at this location since 2002. The Title V permit was renewed and re-issued to the facility on December 3, 2009. There have been no permit revisions since the renewal.

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 Title V permit). Applicability determinations (i.e., determinations made by the SCAQMD 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 WWWW-National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production. The requirements of this NESHAP are reflected in the Title V 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 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).

Since the pre-control potential to emit VOC and PM10 from the equipment are less than 10 and 70 tons per year, respectively, the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 are not applicable to this facility.

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	0.135
CO	0.130
VOC	6.549
PM	0.034
SOx	0.000

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

The Following TACs Were Reported	Emissions (lbs/yr)
1,3-Butadiene	0.349
Ammonia	46.020
Benzene	0.849
Carbon tetrachloride	0.009
Ethylene dibromide	0.011
Ethylene dichloride	0.005
Formaldehyde	10.854
Methylene chloride	0.021
Naphthalene	0.051
Vinyl chloride	0.003

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 2000 with the following risk factors.

Cancer Risk	1.7 in one million
Acute Hazard Index	0.0019
Chronic Hazard Index	0.15

8. Compliance History

As noted, the facility has been in constant operation with a Title V permit since 2002. The facility has been subject to both self-reporting requirements and SCAQMD inspections. The facility has had no citizen complaints filed in the last two calendar years. However in the recent two years, the applicant was issued one Notice to Comply and one Notice of Violation, which are as follows:

- Notice of Violation issued on 03/22/2014 for exceeding the maximum length allowed for stainless steel cuts by the plasma arc cutter.

Compliance Status: The facility had no further violation of the maximum length allowed for the stainless steel cuts; and thus, has achieved compliance with the notice on 09/05/2014.

- Notice to Comply issued on 09/05/2014 requiring the operator to submit permit applications to correct equipment descriptions for two screen printing drying ovens and one afterburner.

Compliance Status: The facility submitted applications for the respective equipment description changes on 10/02/2014; and thus, has achieved compliance with the notice.

The facility is currently operating in compliance with all applicable rules and regulations.

9. Compliance Certification

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