

**SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT
ENGINEERING AND COMPLIANCE**

Coating, Printing and Aerospace Operations Team

PERMIT APPLICATION EVALUATION

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App. number(s)	468736-8, 473945,- 48
Processed by	Rick Lee
Reviewed by	
Date	11/10/2009

PERMIT TO OPERATE EVALUATION
Laser Cutter (2), Dust Collector (2) (existing without permit)

Applicant's Name: Taylor-Dunn Mfg. Co.
Company ID No.: 392
Mailing Address: 2114 W. Ball Rd., Anaheim, CA 92804
Equipment Address: 2114 W. Ball Rd., Anaheim, CA 92804

EQUIPMENT DESCRIPTION:

Application 468736:

LASER CUTTER NO. 1, TRUMPF, MODEL NO. TRUMATIC TC L 2510, SERIAL NO. A0065, 2000 WATTS.

Application 468737:

LASER CUTTER NO. 2, TRUMPF, MODEL NO. TRUMATIC TC L 2510, SERIAL NO. A0053, 2000 WATTS.

Application 468738:

Title V Revision

Application 473945:

AIR POLLUTION CONTROL SYSTEM, CONSISTING OF:

1. DUST COLLECTOR NO. 1 , HANDTE-UMWELTTECHNIK, MODEL NO. MF-L 25/5/1, WITH FIVE FILTERS, 269 SQ. FT. TOTAL FILTER AREA,
2. EXHAUST SYSTEM WITH A 4.4 HP EXHAUST BLOWER VENTING ONE LASER CUTTER.

Application 473948:

AIR POLLUTION CONTROL SYSTEM, CONSISTING OF:

1. DUST COLLECTOR NO. 2 , HANDTE-UMWELTTECHNIK, MODEL NO. MF-L 25/5/1, WITH FIVE FILTERS, 269 SQ. FT. TOTAL FILTER AREA,
2. EXHAUST SYSTEM WITH A 4.4 HP EXHAUST BLOWER VENTING ONE LASER CUTTER.

HISTORY:

The company originally submitted Application Nos. 468736-8 on 5/25/07 for two laser cutting systems and a Title V Revision application. The company had received a Notice of Violation on 3/22/07 for operating the equipment without permits. The company submitted the applications with a letter requesting that the equipment be exempted from a permit under Rule 219(e)(8), however, the equipment was determined not to meet this exemption because it was not oxygen gaseous fuel cutting equipment. The applications were rejected on 8/3/07 for insufficient fees and information. The company resubmitted these applications on 9/26/07 with the proper fees along with A/Ns 473945 and 473948 for two dust collectors which control the emissions from the laser cutting operations.

The facility is in the Title V permitting program, but is not subject to the Reclaim program. The facility is located in an industrial/commercial zone, but has adjacent sensitive receptors, which includes schools. The facility has not been the source of any complaints within the last three years. The only recent enforcement action for the facility was the previously discussed Notice of Violation which also included a

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violation for not maintaining HAP emission records. The facility achieved compliance for this notice on 5/8/07. A public notice will be required due to the schools in the vicinity.

PROCESS DESCRIPTION:

Taylor Dunn manufactures industrial utility vehicles for large companies such as industrial plants and public facilities. At this facility, the company performs metal fabrication, spray painting, vehicle assembly and vehicle maintenance. The facility is operating two laser cutting systems used in the metal fabrication process. The facility uses the equipment to cut a variety of metals, but primarily they use mild steel. Stainless steel is sometimes cut for safety gratings and flooring. During the cutting process, a laser is concentrated on the flat sheet metal with mirrors and a lens. The laser follows a programmed path melting or vaporizing a small section of the metal (kerf). As the laser is cutting, the assist gas, oxygen in this process, blows away the residual metal to keep the cut clean, and also increases the energy at the cutting point by causing oxidation of the molten metal. The cut is typically 0.006" wide, which consists of 0.35 % by wt. of the entire sheet. The material that results in the largest kerf is the 1/2" plate, which has a kerf of 1.24% by wt. An average of 176,442 pounds of metal was cut per month (over a seven month period). PM and toxic emissions come from the vaporization of the metal that is cut away. The emissions are vented through an air pollution control system consisting of a dust collector with five cartridge-type filters. The operating schedule for the facility is 52 wk/yr, 5 day/wk, and 8.5 hr/day.

EMISSION CALCULATIONS:

The laser cutters are used to make custom cuts of steel sheet metal which vary from 18GA through 1/2 inch in thickness. The width of the cuts and the speed of the laser cutters is dependent on the thickness of sheet metal being cut. The density of steel is 0.28 lb/in³. The applicant provided the following data for each type of cut being performed by the laser cutters:

Material	Width of Cut inch	Maximum Speed in/min
18 GA	0.006	450
16 GA	0.006	325
16 GA DIA	0.006	240
14 GA	0.006	240
12 GA	0.006	190
10 GA	0.006	140
7GA	0.01	100
1/4 Plate	0.012	85
3/8 Plate	0.018	45
1/2 Plate	0.02	36

The following emission factors will apply to this process:

EF, PM = 0.12 lb PM per pound of metal cut

EF, Cr+6 = 0.00022 lb Cr⁺⁶ per pound Cr total in metal cut

The emission factors were obtained based on unit data for plasma arc cutting. The chrome emission factor is based on the cutting of steel with a maximum chromium content of 3% by weight. The emissions will be vented to a dust collector which will have a control efficiency of 99%. All other toxics besides hexavalent chromium will assumed to be emitted based on their maximum weight fraction in the metals. The maximum content of each toxic compound in the metals were obtained from all of the MSDS supplied by the applicant and are listed below:

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Compound	Max. Content (% by wt.)
Chromium	3
Nickel	2
Manganese	2.2
Copper	1
Lead	0.1
Arsenic	0.09
Beryllium	0.09
Cadmium	0.09
Selenium	0.9
Vanadium Pentoxide	0.9

PM Emissions

PM=PM10

Material Cut = 5.103 lb/hr/machine

R1, PM = 5.103 lb/hr x 0.12 lb PM/ lb = 0.612 lb PM/hr

R2, PM = 0.612 lb PM/hr x (1-0.99) = 0.00612 lb PM/hr

Hexavalent Chromium

R1, Cr+6 = 5.103 lb PM/hr x (0.03 lb Cr/lb PM) x (0.00022 lb Cr⁺⁶/ lb Cr) = 3.4 x 10⁻⁵ lb Cr⁺⁶/hr

R2, Cr+6 = 3.4 x 10⁻⁵ lb Cr⁺⁶/hr x (1-0.99) = 3.37 x 10⁻⁷ lb Cr⁺⁶/hr

Other Rule 1401 Toxics

Compound	R1	R2
Nickel	0.0122	1.22 x 10 ⁻⁴
Manganese	0.0134	1.35 x 10 ⁻⁴
Copper	6.12 x 10 ⁻³	6.12 x 10 ⁻⁵
Lead	5.51 x 10 ⁻⁴	5.51 x 10 ⁻⁶
Arsenic	5.51 x 10 ⁻⁴	5.51 x 10 ⁻⁶
Beryllium	5.51 x 10 ⁻⁴	5.51 x 10 ⁻⁶
Cadmium	5.51 x 10 ⁻⁴	5.51 x 10 ⁻⁶
Selenium	5.51 x 10 ⁻³	5.51 x 10 ⁻⁵
Vanadium Pentoxide	5.51 x 10 ⁻³	5.51 x 10 ⁻⁵

**RULES/REGULATION
EVALUATION:**

RULE 212, PUBLIC NOTIFICATION

SUBPARAGRAPH 212(c)(1):

This paragraph requires a public notice for all new or modified permit units that may emit air contaminants located within 1,000 feet from the outer boundary of a school. According to Google Maps and the Anaheim City Assessor map, there are multiple schools located within 1000 feet of the permit units. Therefore a public notice will be required to the parents of students attending these schools, as well as any other school within ¼ mile of the facility. The notice will also be required to be distributed to all addresses within 1000 feet of the property line of the facility. A 30-Day public comment period will follow the distribution of the notice. The schools and distances are listed in the table below.

School Name	Address (all in Anaheim, CA 92804)	Distance	
		Source to school property line	Property line to property line
St. Justin Martyr School	2030 W. Ball Rd.	478.5 ft.	251.5 ft
Key Elementary School	2000 W. Ball Rd.	895 ft.	669 ft
Bel-Air Christian School	1241 S. Brookhurst St.	1116.5 ft	567.5 ft
Amaanah Greenbrier Montessori School	1309 S. Brookhurst St.	1361.5 ft	813.4 ft

PARAGRAPH 212(c)(2):

The modified facility will not result in on-site emission increases exceeding the daily maximums for NO_x, CO, VOC or PM₁₀ emissions as specified in Rule 212(g). The only criteria pollutant that will be increased from this facility will be PM₁₀, which will increase less than 0.5 pound per day. Therefore, a 30-day public notice period will not be required under this paragraph.

PARAGRAPH 212(c)(3):

A public notice will not be required under this paragraph since each permit unit will not exceed any of the health risk thresholds. See Rule 1401 evaluation section.

PARAGRAPH 212(g):

The new source will not result in an emission increase exceeding the daily maximums for NO_x, CO, VOC or PM₁₀ emissions as specified in Rule 212(g). Therefore, a 30-day public notice period will not be required under this paragraph.

RULE 401, VISIBLE EMISSIONS

With the proper use of the control equipment, no visible emissions are expected.

RULE 404, PARTICULATE MATTER- CONCENTRATION

The operation of this equipment will result in a negligible amount of particulate matter (0.00612 lb PM/hr) which will be less than the applicable limits of this rule. Compliance with this rule is expected.

RULE 405, PARTICULATE MATTER- WEIGHT

The process will result in a usage rate of 347 lb of metal per hour. The PM emissions resulting from this operation will be 0.00612 lb PM/hr which is well below the 1.29 lb PM/hr limit of this rule. Compliance with this rule is expected.

REGULATION XIII

RULE 1303(a), BEST AVAILABLE CONTROL TECHNOLOGY (BACT)

The laser cutters are controlled by a dust collector which is BACT for particulate matter. The filters have a 99% control efficiency which will satisfy the control efficiency requirements of this rule. Compliance with this rule is expected.

RULE 1303(b)(1), MODELING

The equipment will only result in PM₁₀ emissions. Hourly PM₁₀ emissions are below the limit of 0.41 lb/hr for a noncombustion source in Table A-1 of this rule. Therefore, no modeling requirements will apply to this equipment.

RULE 1304(b)(2), OFFSETS

The addition of the equipment will result in negligible emission increase of PM₁₀ (less than 0.5 pound per day) for the project. Therefore the facility will not be required to offset the increase in emissions for this project.

RULE 1401, NEW SOURCE REVIEW OF TOXIC AIR CONTAMINANTS

The operation of the laser cutters will result in the emission of toxic compounds contained in the metal that is being cut. Based on the Material Safety Data Sheets provided by the applicant, the toxics contained in the metal will be hexavalent chromium, arsenic, beryllium, cadmium, copper, lead, manganese, nickel, selenium, and vanadium pentoxide. The emissions of these compounds were calculated in the Emission Calculation section of this report. The nearest sensitive receptor to the equipment is a residence located 184 feet north, and the nearest commercial receptor is located 437 ft to the west. The equipment qualifies as a volume source since it exhausts inside of the building. The building housing both pieces of equipment has an area of 38753.5 ft². A Tier III Health Risk Assessment was completed based on the maximum emissions of toxic compounds calculated in the Emission Calculation section. The maximum concentration occurs at 31 m from the center of the building where the equipment is located. The results for each piece of equipment show that each resulting MICR is less than the limit of one in a million and the HIA and HIC are each less than 1.0. A condition will be added prohibiting the use of materials in the equipment that contain toxic air contaminants identified in Table I of Rule 1401, with an effective date of 3/4/2005, except for arsenic, beryllium, cadmium, chromium, copper, lead, manganese, nickel, selenium, and vanadium pentoxide. In addition, the maximum concentration of these compounds will be limited to the amounts listed in the Emission Calculation Section. Further, the amount of metal cut by each laser cutter will be limited to 939 pounds per month. Compliance with this rule is expected.

RULE 1401.1, REQUIREMENTS FOR NEW OR RELOCATED FACILITIES NEAR SCHOOLS

The facility qualifies as an existing facility since it had permit units in operation prior to November 5, 2005. Therefore pursuant to subsection (b) of this rule, the requirements of this rule will not apply to this facility.

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REGULATION XXX – TITLE V

This facility is not in the RECLAIM program. The proposed project is considered as a “de minimis significant permit revision” to the Title V permit for this facility.

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 hazardous air pollutants (HAPs) from these permit revisions during the term of the permit are not greater than any of the following emission threshold levels:

Air Contaminant	Daily Maximum (lbs/day)
HAP	30
VOC	30
NO _x	40
PM ₁₀	30
SO _x	60
CO	220

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 2nd permit revision to the Title V renewal permit issued to this facility on March 26, 2006. The following table summarizes the cumulative emission increases resulting from all permit revisions since the Title V renewal permit was issued:

Revision	HAP	VOC	NO _x	PM ₁₀	SO _x	CO
1st Permit Revision: change of conditions to remove hexavalent chromium usage from spray booths	0	0	0	0	0	0
2nd Permit Revision; addition of two laser cutters vented to two dust collectors.	0	0	0	0	0	0
Cumulative Total	0	0	0	0	0	0
Maximum Daily	30	30	40	30	60	220

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”.

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”, it is exempt from the public participation requirements under Rule 3006 (b). A proposed permit incorporating this permit revision

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will be submitted to EPA for a 45-day review pursuant to Rule 3003(j). If EPA does not have any objections within the review period, a revised Title V permit will be issued to this facility.

Since the project will be located within 1000 feet of a school, all public notice requirements pursuant to Rule 212 will be followed prior to issuance of the permit.

PERMIT CONDITIONS

Laser Cutters

1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN COMPLIANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.
[RULE 204]
2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
[RULE 204]
3. THIS EQUIPMENT SHALL NOT BE OPERATED UNLESS IT IS VENTED TO AIR POLLUTION CONTROL EQUIPMENT, WHICH IS IN FULL USE AND WHICH HAS BEEN ISSUED A VALID AQMD PERMIT.
[RULE 1303(a)(1)-BACT; 1401]
4. MATERIALS PROCESSED IN THIS EQUIPMENT SHALL NOT CONTAIN ANY TOXIC AIR CONTAMINANTS IDENTIFIED IN RULE 1401, TABLE 1 WITH AN EFFECTIVE DATE OF MARCH 4, 2005, OR EARLIER, EXCEPT FOR ARSENIC (CAS NO. 7440-38-2), BERYLLIUM (CAS NO. 7440-41-7), CADMIUM (7440-43-9), CHROMIUM (CAS NO. 18540-29-9), COPPER (CAS NO. 7440-50-8), LEAD (CAS NO. 7439-92-1), MANGANESE (CAS NO. 7439-96-5), NICKEL (CAS NO. 7440-02-0), SELENIUM (CAS NO. 7782-49-2), AND VANADIUM PENTOXIDE (CAS NO. 1314-62-1).
[RULE 1401]
5. THE METAL PROCESSED IN THIS EQUIPMENT SHALL NOT HAVE TOXIC COMPOUND CONCENTRATIONS (IN PERCENT BY WEIGHT) EXCEEDING THE FOLLOWING:

A. ARSENIC	0.09%
B. BERYLLIUM	0.09%
C. CADMIUM	0.09%
D. CHROMIUM	3%
E. COPPER	1%
F. LEAD	0.1%
G. MANGANESE	2.2%
H. NICKEL	2%
I. SELENIUM	0.9%
J. VANADIUM PENTOXIDE	0.9%

[RULE 1401]
6. METAL PROCESSED IN THIS EQUIPMENT SHALL NOT HAVE A THICKNESS GREATER THAN 0.5 INCHES.
[RULE 1303(a)(1)-BACT; 1401]
7. THE TOTAL WEIGHT OF METAL BEING CUT IN THIS EQUIPMENT SHALL NOT EXCEED 939 POUNDS IN ANY ONE CALENDAR MONTH. THE TOTAL WEIGHT OF METAL BEING CUT

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SHALL BE DEFINED BY D_{TOTAL} AS SPECIFIED IN CONDITION NO.8.
[RULE 1303(a)(1)-BACT; 1401]

8. THE OPERATOR SHALL MAINTAIN CALENDER MONTHLY RECORDS OF THE TOTAL WEIGHT OF MATERIAL BEING CUT BY THIS EQUIPMENT. THE RECORDS SHALL INCLUDE THE FOLLOWING INFORMATION FOR EACH TYPE OF METAL CUT :
- TYPE OF METAL USED
 - LENGTH OF CUTS IN INCHES PER MINUTE (L)
 - WIDTH OF CUTS IN INCHES (W)
 - THICKNESS OF CUTS IN INCHES (T)
 - THE FOLLOWING CALCULATION SHALL BE PERFORMED FOR EACH DIFFERENT TYPE OF METAL CUT WITH THIS EQUIPMENT:

TOTAL WEIGHT OF MATERIAL BEING CUT, $D = L \times W \times T \times \text{DENSITY (LB/IN}^3)$

D_{TOTAL} = TOTAL OF ALL VALUES OF "D" FOR EACH TYPE OF MATERIAL
[RULE 1303(a)(1)-BACT; 1401]

9. THE OPERATOR SHALL RETAIN ALL RECORDS REQUIRED BY THIS PERMIT AT THE FACILITY FOR FIVE YEARS, AND MAKE ALL RECORDS AVAILABLE TO ANY DISTRICT REPRESENTATIVE UPON REQUEST.
[RULE 1303(a)(1)-BACT; 1401]

Periodic Monitoring:

10. 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 ANY 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:

- 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; OR
- HAVE A CARB-CERTIFIED SMOKE READER DETERMINE COMPLIANCE WITH THE OPACITY STANDARD, USING EPA METHOD 9 OR THE PROCEDURES IN THE CARB MANUAL "VISIBLE EMISSION 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:

- STACK OR EMISSION POINT IDENTIFICATION;

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- B. DESCRIPTION OF ANY CORRECTIVE ACTIONS TAKEN TO ABATE VISIBLE EMISSIONS;
- C. DATE AND TIME VISIBLE EMISSION WAS ABATED; AND
- D. VISIBLE EMISSION OBSERVATION RECORDED BY A CERTIFIED SMOKE READER.
[RULE 3004 (a)(4)]

Emissions and Requirements:

- 11. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS:

PM: RULE 405, SEE APPENDIX B FOR EMISSION LIMITS

Dust Collectors

- 1. OPERATION OF THIS EQUIPMENT SHALL BE CONDUCTED IN COMPLIANCE WITH ALL DATA AND SPECIFICATIONS SUBMITTED WITH THE APPLICATION UNDER WHICH THIS PERMIT IS ISSUED UNLESS OTHERWISE NOTED BELOW.
[RULE 204]
- 2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.
[RULE 204]
- 3. THIS EQUIPMENT SHALL BE IN FULL OPERATION WHENEVER THE EQUIPMENT IT SERVES IS IN OPERATION.
[RULE 1303(a)(1)-BACT]
- 4. THE OPERATOR SHALL DISCHARGE DUST COLLECTED IN THIS EQUIPMENT ONLY INTO CLOSED CONTAINERS.
[RULE 1303(a)(1)-BACT]
- 5. THE OPERATOR SHALL USE THIS EQUIPMENT IN SUCH A MANNER THAT THE DIFFERENTIAL PRESSURE ACROSS THE FILTER DOES NOT EXCEED 23 MBAR. TO COMPLY WITH THIS CONDITION THE OPERATOR SHALL INSTALL AND MAINTAIN A PRESSURE GAUGE TO ACCURATELY INDICATE THE DIFFERENTIAL PRESSURE ACROSS THE FILTER. THE OPERATOR SHALL DETERMINE AND RECORD THE PARAMETER BEING MONITORED ONCE EVERY 7 DAYS.
[RULE 1303(a)(1)-BACT]
- 6. THE OPERATOR SHALL NOT USE THIS EQUIPMENT UNLESS ALL EXHAUST AIR PASSES THROUGH THE FILTER MEDIA.
[RULE 1303(a)(1)-BACT]

Periodic Monitoring:

- 7. 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. THE OPERATOR SHALL KEEP RECORDS, IN A MANNER APPROVED BY THE DISTRICT, FOR THE FOLLOWING PARAMETER(S) OR ITEM(S):

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- A. THE NAME OF THE PERSON PERFORMING THE INSPECTION AND/OR MAINTENANCE OF THE FILTER MEDIA;
 - B. THE DATE, TIME AND RESULTS OF THE INSPECTION; AND
 - C. THE DATE, TIME AND DESCRIPTION OF ANY MAINTENANCE OR REPAIRS RESULTING FROM THE INSPECTION.
- [RULE 3004(a)(4)]

Emissions and Requirements:

- 8. THIS EQUIPMENT IS SUBJECT TO THE APPLICABLE REQUIREMENTS OF THE FOLLOWING RULES AND REGULATIONS:

PM: RULE 404, SEE APPENDIX B FOR EMISSION LIMITS