



**SOUTH COAST AIR QUALITY
MANAGEMENT DISTRICT**
ENGINEERING AND COMPLIANCE DIVISION
Coating, Printing, Aerospace & Metal Finishing Team
PERMIT APPLICATION EVALUATION

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Processed by WWilson
Reviewed by SEbiner
Date 7/7/08

PERMIT TO OPERATE
Change of Condition - Spray Booth

Applicant's Name: AMF Anaheim LLC
Facility ID: 149235
Mailing Address: 2100 E. Orangewood Ave, Anaheim, CA 92806
Equipment Address: 2100 E. Orangewood Ave, Anaheim, CA 92806

EQUIPMENT DESCRIPTION

A/N 473462

Change of Condition to A/N 460294, PO F92057

POWDER COATING BOOTH, 8'-0" W. X 10'-0" L. X 8'-0" H., WITH SIXTEEN 20" X 20" PREFILTERS, SIXTEEN 20" X 20" POCKET EXHAUST FILTERS, SIX 24" X 24" X 12" HEPA FINAL FILTERS AND ONE 3 H.P. EXHAUST FAN.

To increase powder coating throughput from 37 lb/day to 500 lb/day.

A/N 473461

Change of Condition to A/N 470385, PO F92073

SPRAY BOOTH, RELCO ENGINEERS, 12'-0" W. X 13'-8" L. X 9'-10" H., WITH THIRTY FIVE 20" X 20" PREFILTERS, THIRTY-FIVE 20" X 20" POCKET FILTERS, EIGHT 24" X 24" X 12" HEPA FINAL FILTERS, AND ONE 5 H.P. EXHAUST FAN.

To increase powder coating throughput from 250 lb/day to 500 lb/day.

Conditions

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.
2. THIS EQUIPMENT SHALL BE PROPERLY MAINTAINED AND KEPT IN GOOD OPERATING CONDITION AT ALL TIMES.



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3. GAUGES SHALL BE INSTALLED TO INDICATE, IN INCHES OF WATER, THE STATIC PRESSURE DIFFERENTIAL ACROSS THE EXHAUST FILTERS. IN OPERATION, THE PRESSURE DIFFERENTIAL ACROSS THE PRE-FILTERS AND THE POCKET FILTERS SHALL NOT EXCEED 1 INCH OF WATER COMBINED, AND THE PRESSURE DIFFERENTIAL ACROSS THE FINAL FILTERS SHALL NOT EXCEED 1.5 INCHES OF WATER.
4. THIS EQUIPMENT SHALL NOT BE OPERATED UNLESS ALL EXHAUST AIR PASSES THROUGH THE THREE-STAGE FILTER SYSTEM.
5. THE HEPA (FINAL) FILTERS USED IN THIS EQUIPMENT SHALL BE INDIVIDUALLY DOP (OR EQUIVALENT) TESTED WITH 0.3 MICRON PARTICLES AND CERTIFIED TO HAVE AN EFFICIENCY OF NOT LESS THAN 99.97%.
6. THIS EQUIPMENT SHALL BE OPERATED IN COMPLIANCE WITH RULES 1107 AND 1171.
7. THE TOTAL QUANTITY OF VOLATILE ORGANIC COMPOUND (VOC) EMISSIONS DISCHARGED TO THE ATMOSPHERE FROM THIS FACILITY SHALL NOT EXCEED 372 POUNDS IN ANY ONE DAY. (FACILITY CONDITION)
8. THE TOTAL QUANTITY OF POWDER COATING MATERIALS APPLIED IN THIS EQUIPMENT SHALL NOT EXCEED 500 POUNDS IN ANY ONE DAY.
9. IN ADDITION TO THE RECORDKEEPING REQUIREMENTS IN RULE 109, THE OPERATOR SHALL KEEP ADEQUATE RECORDS FOR THIS EQUIPMENT TO VERIFY THE DAILY POWDER COATING USAGE IN POUNDS AND THE DAILY VOC EMISSIONS IN POUNDS. THE VOC EMISSIONS FROM THE USE OF POWDER COATINGS SHALL BE CALCULATED USING THE EMISSION FACTOR DETERMINED PURSUANT TO SCAQMD METHOD 316C. IN CASE NO LABORATORY TESTED EMISSION FACTOR IS AVAILABLE, THEN A FACTOR OF 0.01 POUNDS OF VOC PER POUND OF POWDER SPRAYED SHALL BE USED.
10. MATERIALS USED IN THIS EQUIPMENT SHALL NOT CONTAIN ANY COMPOUNDS IDENTIFIED AS TOXIC AIR CONTAMINANTS IN RULE 1401, TABLE I, WITH AN EFFECTIVE DATE OF MARCH 4, 2005 OR EARLIER.
11. MATERIAL SAFETY DATA SHEETS FOR ALL MATERIALS USED AT THIS FACILITY AND SUBJECT TO DISTRICT RULES SHALL BE KEPT CURRENT

 <p style="text-align: center;">SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT ENGINEERING AND COMPLIANCE DIVISION <i>Coating, Printing, Aerospace & Metal Finishing Team</i> PERMIT APPLICATION EVALUATION</p>	<p>Page 3 of 8 A/Ns See description Processed by WWilson Reviewed by SEbiner Date 7/7/08</p>
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AND MADE AVAILABLE TO DISTRICT PERSONNEL UPON REQUEST.
(FACILITY CONDITION)

BACKGROUND

AMF Anaheim LLC submitted two applications on 9/12/07 for a change of condition to increase the powder coating throughput for two spray booths. The company manufactures sheet metal chassis and panels. Operations include shaping and forming, cleaning, finishing and assembly. The company has several powder coating spray booths, wet spray booths and ovens. The powder coating spray booths are now equipped with a three-stage filtration system estimated to have 99.97% efficiency. They originally had lower efficiency filters for the final filter but have recently replaced the final filter with higher efficiency of 99.97% filters to minimize PM₁₀ emissions with the powder usage increase. Manufacturer's information for the filters is in the file.

In a site visit on 11/15/07, the processing engineer, Wilma Wilson observed application of powder coatings to the metal parts to enhance their appearance and to increase corrosion resistance. I was with Jim Marzolino, corporate compliance manager and Roy, paint supervisor. The area was clean and no dust or powders were on the floor. This facility has other powder coating spray booths with a powder usage limit of 500 lb/day.

A NOV # P52152 was issued for exceeding their powder usage, F92057 by 2 pounds and F92073 by 28 pounds. There are no other changes in the permit descriptions and operating conditions.

AMF is a Title V facility. The proposed project is considered as a "de minimis significant permit revision" to the initial Title V permit, as described in Regulation XXX evaluation.



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EMISSION CALCULATIONS

The facility is operating under an emission cap of 372 lbs/day of VOC. There will be no VOC emission increase from the facility since the facility cap will remain the same. Both powder booths will have an equipment limit of 500 lbs. of powder coatings applied per day and will be equipped with 99.97% HEPA final filters.

PM = PM₁₀ Emissions

hr/dy 24
dy/wk 5
wk/yr 52
Filter Eff (prev) 99.50%
Filter Eff (hepa) 99.97%
Transfer Eff 65%

A/N	<i>Pre-Modification(R2)</i>		<i>Post-Modification(R2)</i>		
	Powder	PM/PM10	Powder	PM/PM10	
	lb/day	lb/day	lb/day	lb/day	lb/hr
473462	37	0.06	500	0.05	0.002
473461	250	0.44	500	0.05	0.002

RULE EVALUATION

RULE 212(c)(1) *This section requires a public notice for all new and modified permit units that may emit air contaminants located within 1,000 feet from the outer boundary of a school.*

Since there are no schools within 1,000 feet of the facility, a public notice will not be required by this section.

RULE 212(c)(2) *This section requires a public notice for all new and modified facilities which have on-site emission increases exceeding any of the daily maximums specified in subdivision (g).*

There is no emission increase from the facility due to this modification, there is a decrease in PM10 emissions since the company will install filters with a higher efficiency, and no increase in VOC since the facility cap will stay the same. The following table summarizes the emission limits and increases. Public notice is not required.



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LB/DAY	CO	NOX	PM10	ROG	LEAD	SOX
Max Limit	220	40	30	30	3	60
Increases	0	0	0	0	0	0

RULE 212(c)(3) *This section requires a public notice for all new or modified permit units with increases in emissions of toxic air contaminants listed in Table I of Rule 1401 resulted in MDCR greater than $1E^{-6}$ per permit unit or greater than $10E^{-6}$ per facility.*

There will be no emissions of TAC from this equipment. Therefore, public notice is not required.

RULE 212(g) *This section requires a public notice for all new and modified sources that have equipment emission increases exceeding any of the daily maximum as specified by Rule 212 (g).*

As shown in the following table, the emission increase from the project due to this modification will not exceed the daily maximum limits below. The following table summarizes the emission limits and increases. Public notice is not required.

There may be an increase in VOC emissions from the ovens used to cure the powder but the emissions will be < 5 lb/day VOC.

A/N	Powder Usage (lb/day)			VOC emissions (lb/day)	
	New	Previous	Increase	EF (lb/lb powder)	Total
473462	500	37	463	0.01	4.63
473461	500	250	250	0.01	2.5

	ROG	NO _x	PM ₁₀	SO ₂	CO	Pb
Per project	0	0	0	0	0	0
MAX MDC Limit (lb/day)	30	40	30	60	220	3
Required Public Notice	No	No	No	No	No	No



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RULE 401 *Visible Emissions*

Visible emissions are not expected with proper maintenance and operation of this equipment and were not observed during the site visit.

RULE 402 *Nuisance*

Operation of this equipment is not expected to create complaints or nuisance with proper maintenance and operation. Odors were not observed during the site visit.

RULE 1107 *Metal Coating Operations*

The powder coating is applied with an electrostatic gun. Compliance is expected.

RULE 1171 *Solvent Cleaning Operations*

The powder coating guns are cleaned by blowing air through the guns. Compliance is expected.

REG XIII *Rule 1303(a), Best Available Control Technology (BACT)*

The powder coating spray booths are equipped with a three-stage filtration system with an estimated control efficiency of 99.97% for particulate matter. This complies with BACT for powder booths.

Rule 1303 (b)(1), Modeling

PM10 emissions are under the allowable of 0.41 lb/hr (Table A-1), therefore modeling is not required.

Rule 1304 (c)(1), Offsets Exemption

There is no increase in VOC or PM10 emissions as a result of this project, therefore offsets are not required.

RULE 1401 *New Source Review of Toxic air Contaminants*

There will be no increase in TAC. Compliance is expected.



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REG XXX

The proposed project is considered as a “de minimis significant permit revision” to the Title V renewal permit issued to the previous owner, APW (ID# 110175) on 7/9/06 and the revision issued for change of operator to AMF Anaheim on September 4, 2007. Rule 3000(b)(6) defines a “de minimis significant permit revision” as any Title V permit revision where the cumulative emission increases on non-RECLAIM pollutants or hazardous air pollutants (HAP) from these permit revisions during the term of the permit are not greater than any of the following emission threshold levels:

<i>Air Contaminant</i>	<i>Daily Maximum (lbs/day)</i>
HAP	30
VOC	30
NOx	40
PM10	30
SOx	60
CO	220

Rule 3003(j) specifies that a proposed permit for the Title V renewal permit shall be submitted to EPA for review. To determine if a project qualifies for a “de minimis significant permit revision”, emission increases resulting from all permit revisions that are made after the submittal of proposed permit to EPA shall be accumulated and compared to the above threshold levels. The proposed project is the second permit revision requested by the facility since the submittal of the proposed permit to EPA. This permit revision includes the change of condition for two powder spray booths. The cumulative emission increases resulting from this proposed permit revision are summarized as follows:

<i>Revision</i>	<i>HAP</i>	<i>VOC</i>	<i>NOx</i>	<i>PM₁₀</i>	<i>SOx</i>	<i>CO</i>
2nd Revision: Change permit condition to increase throughput on two powder spray booths, A/N 473461 and 473462.	0	0	0	5	0	0
1 st Revision (administrative): change of operator from APW (ID# 110175) to AMF Anaheim (ID# 149235) issued 9/4/07 (Revision 0).	0	0	0	5	0	0
Maximum Daily Limit	30	30	40	30	60	220



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