

South Coast Air Quality Management District

Statement of Basis

Proposed Title V Renewal Permit

Facility Name:	Arlon Graphics LLC
Facility ID:	167066
SIC Code:	2672
Equipment Location:	2811 South Harbor Boulevard Santa Ana, CA 92704
Application #(s):	525168
Application Submittal Date(s):	07/05/11
AQMD Contact Person:	Hamed Mandilawi, Senior Engineer
Phone Number:	(909) 396-3275
E-Mail Address:	hmandilawi@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 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 AQMD 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 AQMD 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 AQMD implements Title V through Regulation XXX – Title V Permits, adopted by the AQMD 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 lead are in attainment with federal standards. 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 Arlon Graphics LLC located at 2811 South Harbor Boulevard, Santa Ana, CA 92704. This facility is subject to Title V requirements because it is a major source.

2. Facility Description

This is an existing facility applying for a Title V permit renewal that is in the business of paper and film adhesive coating. This facility operates three coating lines and associated ovens, two mixing booths, a flexographic press, a drum cleaner, a solvent still, and other supporting equipment. Volatile organic compound (VOC) emissions from two coatings lines and associated ovens, the flexographic press, and the drum cleaner are vented to an air pollution control equipment afterburner.

3. Construction and Permitting History

The facility has been in constant operation with a Title V permit at this location since 2002. Numerous permits to construct and or permits to operate have been issued to the facility since February 2002. A Title V renewal permit was issued to this facility on February 4, 2007.

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 JJJJ-National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating, 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).

VOC emissions from two coatings lines and associated ovens, the flexographic press, and the drum cleaner are vented to an air pollution control equipment afterburner. The uncontrolled VOC emissions to the afterburner is greater than the major source threshold for VOC of 10 tons per year. As a result, the air pollution control system is subject to the Compliance Assurance

Monitoring (CAM) requirements of 40 CFR Part 64. Permit conditions have been added to the air pollution control system to satisfy the CAM requirements. Such permit conditions were developed using the design criteria and other pertinent requirements identified in 40 CFR 64- Compliance Assurance Monitoring and Technical Guidance Document and in the August 1998 Revised Draft CAM.

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 2010

Pollutant	Emissions (tons/year)
NOx	1.585
CO	0.449
VOC	2.591
PM	0.091
SOx	0.007

Toxic Air Contaminants Emissions (TAC) Annual Reported Emissions for Reporting Period 2010

The Following TACs Were Reported	Emissions (lbs/yr)
Ammonia	439
Benzene	0.171
Formaldehyde	0.364
Naphthalene	0.007
PAH's	0.002

Health Risk from Toxic Air Contaminants

The facility is subject to review by the Air Toxics Information and Assessment Act (AB2588). The facility was determined to be exempt from the requirements of AB2588.

8. Compliance History

As noted, the facility has been in constant operation with a Title V permit since 2001. The facility has been subject to both self-reporting requirements and AQMD inspections. The facility has had no citizen complaints filed, or Notices of Violation issued in the last two years. However, the facility was issued three Notices to Comply during the last two years requiring the applicant to modify records for the solvent recovery still to show daily and monthly amount of dirty solvent processed, report the quantity of fuel burned by metered NOx sources in standard cubic feet, use proper rounding procedures to report Quarterly NOx emissions, and submit semi-annual monitoring report by the compliance due date. The applicant complied with all the requests in the notices and 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.