

Western Tube & Conduit
2001 E. Dominguez St.
Carson, CA 90810
ID No.: 22092

EQUIPMENT DESCRIPTION

A/N 472361: Title V Permit Revision

A/N 470480 (Current a/n 459072, p/n F83923)

SPRAY BOOTH, END SPRAY LINE NO. 6, EAGLE, FLOOR TYPE, MODEL NO. EIB-20-8, 20'-0" W. X 10'-6" D. X 8'-0" H., WITH THIRTY SIX 20" X 20" EXHAUST FILTERS AND ~~TWO~~ ONE 3 HP EXHAUST FANS.

A/N 470482 (Current a/n 430503, p/n F74280)

AIR POLLUTION CONTROL SYSTEM CONSISTING OF:

1. REGENERATIVE THERMAL OXIDIZER, ADWEST TECHNOLOGIES, MODEL NO. RETOX 15.0 RTO95, 16'-2" W. X 25'-6" L. X 10'-9" H., 4,500,000 BTU PER HOUR NATURAL GAS-FIRED START-UP BURNER, ONE 2,200,000 BTU PER HOUR NATURAL GAS INJECTION SYSTEM, ONE 7.5 HP COMBUSTION AIR BLOWER, TWO HEAT EXCHANGER BEDS WITH A TOTAL OF 30,980 LBS OF CERAMIC MEDIA.
2. EXHAUST SYSTEM CONSISTING OF ONE 75 HP EXHAUST FAN VENTING ONE OUTER DIAMETER COATER ENCLOSED IN A PERMANENT TOTAL ENCLOSURE, ONE OVEN AND ONE INSIDE DIAMETER SPRAY ENCLOSURE ~~AND ONE END SPRAY MACHINE SYSTEM.~~

A/N 470488 (Current a/n 409242, p/n F67855)

FLOW COATER, LINE NO. 3, ANTI-RUST OIL, 1'-5" L. X 2'-6" W H.

A/N 470489 (Current a/n 409243, p/n F67854)

FLOW COATER, LINE NO. 5, ANTI-RUST OIL, 1'-5" L. X 2'-6" W H.

A/N 470490 (Current a/n 409241, p/n F67853)

FLOW COATER, LINE NO. 1, ANTI-RUST OIL, 1'-5" L. X 1'-5" ~~2'-6"~~ H.

A/N 470494 (Current a/n 389689, p/n F43354)

CONVEYORIZED SPRAY SYSTEMS CONSISTING OF:

1. TWO HVLP SPRAY GUNS, BINKS MACH I, MODEL NO. BBR.
2. EXHAUST SYSTEM CONSISTING OF TWO 1'-4" X 2'-6" ~~6" X 60"~~ EXHAUST FILTERS AND ONE 1 ½ HP EXHAUST FAN.
3. ONE 1 ½ HP CONVEYOR MOTOR.

APPLICATION PROCESSING AND CALCULATION

A/N 470496 (Current a/n 369306, p/n F31270)

Change wording from the following:

~~OPEN SPRAY EQUIPMENT, BINKS, MODEL BBR 94788, ONE HVLP GUN AND ONE 5 GALLON PRESSURE POT.~~

To the following:

OPEN SPRAY EQUIPMENT CONSISTING OF:

- 1. ONE HVLP SPRAY GUN.
- 2. ONE 5-GALLON PRESSURE POT, LE GRANGE.
- 3. AIR MIX MOTOR, DEVILBISS TYPE QS.

A/N 470497 (Current a/n 389686, p/n F43352)

CONVEYORIZED SPRAY SYSTEM CONSISTING OF:

- 1. TWO HVLP SPRAY GUNS, BINKS MACH I, MODEL NO. BBR.
- 2. EXHAUST SYSTEM CONSISTING OF TWO 1'-4" X 2'-6" ~~6" X 60"~~ EXHAUST FILTERS AND ONE 1½ HP EXHAUST FAN.
- 3. ONE 1½ HP CONVEYOR MOTOR.

A/N 471340 (Current a/n 369299, p/n F31128)

OUTER DIAMETER COATING WIPER, LINE NO. 4, WITH ONE 3 HP EXHAUST FAN.

A/N 471341 (Current a/n 369300, p/n F31265)

OUTER DIAMETER COATING WIPER, LINE NO. 2, WITH ONE 3 HP EXHAUST FAN.

A/N 471342 (Current a/n 369713, p/n F48373)

OUTER DIAMETER COATING WIPER, LINE NO. 6, WITH ONE 3 HP EXHAUST FAN.

BACKGROUND

Western Tube & Conduit submitted these applications to correct information contained in their existing Title V permit. No changes to operating conditions have occurred or are proposed at this time and the requested changes will not result in operating the equipment differently or an emission increase. The changes are underlined and/or striked in the above descriptions and are outlined as follows:

Application no.	Current Permit No.	Requested Change
470480	F83923	Correct the number of exhaust fans from one 3 HP fan to two 3 HP fans. No emission increase expected, material usage remains restricted to 25 gal/day and material VOC not to exceed 5% by weight.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT	Pages 5
Engineering and Compliance	Appl. no. Below
APPLICATION PROCESSING AND CALCULATION	Processed by Todd Iwata
	Checked by
	Date 4.30.08

470482	F74280	Remove one end spray machine, equipment never installed.
470488	F67855	Correct dimension, 2'-6" W. instead of 2'-6" H. No emission increase expected, material usage remains restricted to 65.5 gal/day and material VOC not to exceed 5% by weight.
470489	F67854	Correct dimension, 2'-6" W. instead of 2'-6" H. No emission increase expected, material usage remains restricted to 65.5 gal/day and material VOC not to exceed 5% by weight.
470490	F67853	Correct dimension, 1'-5" H. instead of 2'-6" H. No emission increase expected, material usage remains restricted to 65.5 gal/day and material VOC not to exceed 5% by weight.
470494	F43354	Correct filter size from 6" x 60" to 16" x 30" and replace one ½ HP conveyor motor with one 1 HP conveyor motor. No emission increase expected, VOC emissions remain restricted to 21 lb/day.
470496	F31270	Reword equipment description for improved accuracy.
470497	F43352	Remove spray gun information, correct filter size from 6" x 60" to 16" x 30" and replace one ½ HP conveyor motor with one 1 HP conveyor motor. No emission increase expected, VOC emissions remain restricted to 21 lb/day.
471340	F31128	Modify Rule 1401 condition. WTC will use coatings which contain additional toxic air contaminants. No cancer risk equal or greater than 1 in a million and no acute or chronic health hazard risk expected.
471341	F31265	Modify Rule 1401 condition. WTC will use coatings which contain additional toxic air contaminants. No cancer risk equal or greater than 1 in a million and no acute or chronic health hazard risk expected.
471342	F48373	Modify Rule 1401 condition. WTC will use coatings which contain additional toxic air contaminants. No cancer risk equal or greater than 1 in a million and no acute or chronic health hazard risk expected.

Western Tube & Conduit is a Title V facility. A Title V renewal permit was issued to this facility on October 1, 2006. Western Tube & Conduit has proposed to revise their Title V renewal permit by making minor corrections to their facility permit. This permit revision is considered as a "de minimis significant permit revision" to the initial Title V permit, as described in the Regulation XXX evaluation.

PROCESS DESCRIPTION

Western Tube & Conduit manufactures metal tubes and conduits. The end product is varied, chain-linked fence poles, electric wire conduits, etc. After the tubes and conduits are cut to size, some are painted with a touch-up coating in the spray booths. After the coating, the tubes and conduits are packaged and prepared for shipping. Western Tube & Conduit operates under an existing 1,417 lbs/day facility VOC emission limit and under the requirements of Rules 1107 and 1171. They operate up to 24 hrs/day, 365 days/yr.

EMISSION ESTIMATES

Since the equipment will be operated as previously permitted, there will not be an increase in emissions. Emission estimates for the proposed project will be the same emissions as determined with the previous applications.

RISK ASSESSMENT

Western Tube & Conduit is requesting to modify the Rule 1401 condition for three outer diameter coating wipers (a/n 471340, 471341 and 471342). They want to use coatings which contain lead chromate, ethylene glycol monobutyl ether, naphthalene, isopropyl alcohol, xylene, ethyl benzene, formaldehyde, toluene, propylene glycol monomethyl ether and nickel oxide and thus needs to modify the Rule 1401 condition. They also want to add cadmium to the list of Rule 1401 exempt compounds in case they use a coating which contains cadmium. Since the outer diameter coating wipers do not spray the coatings on the tubes, lead chromate, nickel oxide and cadmium will not be emitted, only the volatile compounds will be emitted. A Tier 3 Screening Risk Assessment was conducted and there will not be a cancer risk equal or greater than one in a million or an acute or chronic health hazard risk. The cancer risk at the residential receptor is 4.92E-07 and 1.42E-07 at the commercial receptor. (See application no. 470480 for the Tier 3 Screening Risk Assessment spreadsheets.

RULE ANALYSIS

RULE 212: Public notification is not necessary since this is not a significant project. There is not an emission increase of any criteria pollutant, the facility is not located within 1,000 feet of a school and there is not a cancer risk equal or greater than one in a million.

RULE 401: Visible emissions are not expected with the proper operation of the equipment.

RULE 402: Operation of the equipment is not expected to create a nuisance.

Reg XI: Western Tube & Conduit will continue to operate the equipment in compliance with the applicable rules of this regulation since there will be no operational changes.

Reg XIII: There will not be an emission increase with this project. The equipment will be operated as previously permitted, in compliance with the requirements of this regulation.

RULE 1401: There will not be a cancer risk equal or greater than one in a million or an acute/chronic health hazard risk, see the RISK ASSESSMENT section for details.

REGULATION XXX:

The project is considered as a “de minimis significant permit revision” to the Title V permit issued to 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 (HAP) 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

Rule 3003(j) specifies that a proposed permit for revision 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 issuance of the Title V renewal permit shall be accumulated and compared to the above threshold levels. The cumulative emission increases resulting from this proposed permit revision are summarized as follows:

Revision	HAP	VOC	NO _x	PM ₁₀	SO _x	CO
1 st Permit Revision	0	0	0	0	0	0
Net Emission Total	0	0	0	0	0	0
Maximum Daily	30	30	40	30	60	220

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