FACILITY PERMIT TO OPERATE

TRIUMPH PROCESSING, INC.
2588 & 2605 INDUSTRY WAY
LYNWOOD, CA 90262

NOTICE

IN ACCORDANCE WITH RULE 206, THIS PERMIT TO OPERATE OR A COPY THEREOF MUST BE KEPT AT THE LOCATION FOR WHICH IT IS ISSUED.

THIS PERMIT DOES NOT AUTHORIZE THE EMISSION OF AIR CONTAMINANTS IN EXCESS OF THOSE ALLOWED BY DIVISION 26 OF THE HEALTH AND SAFETY CODE OF THE STATE OF CALIFORNIA OR THE RULES OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT. THIS PERMIT SHALL NOT BE CONSTRUED AS PERMISSION TO VIOLATE EXISTING LAWS, ORDINANCES, REGULATIONS OR STATUTES OF ANY OTHER FEDERAL, STATE OR LOCAL GOVERNMENTAL AGENCIES.

Barry R. Wallerstein, D. Env.
EXECUTIVE OFFICER

By _____ FOR
Mohsen Nazemi, P.E.
Deputy Executive Officer
Engineering & Compliance

FACILITY PERMIT TO OPERATE
TRIUMPH PROCESSING, INC.

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SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 2 : SURFACE PREPARATION					
System 1 : Anodizing Line No. A3					
PROCESS TANK, HEATED, AIR SPARGED, NO. 60, CLEANING, ALKALINE SOAP SOLUTION, AIR SPARGED, WIDTH: 2 FT 6 IN; HEIGHT: 6 FT; LENGTH: 62 FT A/N: 494828 Permit to Construct Issued: 11/18/09	D13				
PROCESS TANK, ETCHING, HEATED, AIR SPARGED, NO. 62, SODIUM HYDROXIDE, WIDTH: 2 FT 6 IN; HEIGHT: 6 FT; LENGTH: 62 FT A/N: 494828 Permit to Construct Issued: 11/18/09	D14				
PROCESS TANK, UNHEATED, NO. 63, CLEANING, CHROMIC ACID, HYDROCHLORIC ACID, WIDTH: 2 FT 6 IN; HEIGHT: 6 FT; LENGTH: 62 FT A/N: 494828 Permit to Construct Issued: 11/18/09	D15				
PROCESS TANK, UNHEATED, NO. 65, CONVERSION COATING, ALODINE, WIDTH: 2 FT 6 IN; HEIGHT: 6 FT; LENGTH: 62 FT A/N: 494828 Permit to Construct Issued: 11/18/09	D16				

* (1)(1A)(1B) Denotes RECLAIM emission factor
(2)(2A)(2B) Denotes RECLAIM emission rate
(3) Denotes RECLAIM concentration limit
(4) Denotes BACT emission limit
(5)(5A)(5B) Denotes command and control emission limit
(6) Denotes air toxic control rule limit
(7) Denotes NSR applicability limit
(8)(8A)(8B) Denotes 40 CFR limit(e.g. NSPS, NESHAPS,etc.)
(9) See App B for Emission Limits
(10) See Section J for NESHAP/MACT requirements

** Refer to Section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

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Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 2 : SURFACE PREPARATION					
PROCESS TANK, CHROMIC ACID ANODIZING, HEATED, RECTIFIED-8,000 AMPS, NO. 67, CHROMIC ACID, WITH WATER SEALED COVER WITH 6 SUBMICRON MEMBRANE FILTERS, WIDTH: 3 FT; HEIGHT: 6 FT; LENGTH: 62 FT A/N: 494828 Permit to Construct Issued: 11/18/09	D17				D182.2, E193.1, E193.3, E193.4, E448.2, H23.6, K48.1
PROCESS TANK, UNHEATED, NO. 69, HOLDING TANK, WIDTH: 2 FT 6 IN; HEIGHT: 6 FT; LENGTH: 62 FT A/N: 494828 Permit to Construct Issued: 11/18/09	D39				
PROCESS TANK, ANODIZING, UNHEATED, RECTIFIED, AIR SPARGED, NO. 70, SULFURIC ACID, WIDTH: 3 FT; HEIGHT: 6 FT; LENGTH: 62 FT A/N: 494828 Permit to Construct Issued: 11/18/09	D18				
PROCESS TANK, HEATED, NO. 72, SEALING, SODIUM CHROMATE, CHROMIC ACID, WIDTH: 2 FT 6 IN; HEIGHT: 6 FT; LENGTH: 62 FT A/N: 494828 Permit to Construct Issued: 11/18/09	D62				

* (1)(1A)(1B) Denotes RECLAIM emission factor
(2)(2A)(2B) Denotes RECLAIM emission rate
(3) Denotes RECLAIM concentration limit
(4) Denotes BACT emission limit
(5)(5A)(5B) Denotes command and control emission limit
(6) Denotes air toxic control rule limit
(7) Denotes NSR applicability limit
(8)(8A)(8B) Denotes 40 CFR limit(e.g. NSPS, NESHAPS,etc.)
(9) See App B for Emission Limits
(10) See Section J for NESHAP/MACT requirements

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Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 2 : SURFACE PREPARATION					
PROCESS TANK, HEATED, NO. 74, SEALING, SODIUM CHROMATE, CHROMIC ACID, WIDTH: 2 FT 6 IN; HEIGHT: 6 FT; LENGTH: 62 FT A/N: 494828 Permit to Construct Issued: 11/18/09	D19				
System 2 : Anodizing Line No. A1					
PROCESS TANK, HEATED, AIR SPARGED, NO. 1, CLEANING, ALKALINE SOAP SOLUTION, WIDTH: 3 FT; HEIGHT: 9 FT; LENGTH: 62 FT A/N: 494830 Permit to Construct Issued: 11/18/09	D81				
PROCESS TANK, ETCHING, HEATED, AIR SPARGED, NO. 3, SODIUM HYDROXIDE, WIDTH: 3 FT; HEIGHT: 9 FT; LENGTH: 26 FT A/N: 494830 Permit to Construct Issued: 11/18/09	D20	C43			
PROCESS TANK, UNHEATED, NO. 5, CLEANING, HYDROFLUORIC ACID, CHROMIC ACID, WIDTH: 3 FT; HEIGHT: 9 FT; LENGTH: 26 FT A/N: 494830 Permit to Construct Issued: 11/18/09	D21				
PROCESS TANK, UNHEATED, NO. 7, CONVERSION COATING, ALODINE, WIDTH: 3 FT; HEIGHT: 9 FT; LENGTH: 26 FT A/N: 494830 Permit to Construct Issued: 11/18/09	D22				

* (1)(1A)(1B) Denotes RECLAIM emission factor
(2)(2A)(2B) Denotes RECLAIM emission rate
(3) Denotes RECLAIM concentration limit
(4) Denotes BACT emission limit
(5)(5A)(5B) Denotes command and control emission limit
(6) Denotes air toxic control rule limit
(7) Denotes NSR applicability limit
(8)(8A)(8B) Denotes 40 CFR limit(e.g. NSPS, NESHAPS,etc.)
(9) See App B for Emission Limits
(10) See Section J for NESHAP/MACT requirements

** Refer to Section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

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The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 2 : SURFACE PREPARATION					
PROCESS TANK, CHROMIC ACID ANODIZING, HEATED, RECTIFIED-6,000 AMPS, NO. 9, CHROMIC ACID, WITH WATER SEALED COVER WITH 3 SUBMICRON MEMBRANE FILTERS, WIDTH: 5 FT; HEIGHT: 10 FT; LENGTH: 27 FT A/N: 494830 Permit to Construct Issued: 11/18/09	D23			**TOTAL CR:** (9) **[RULE 1469, #4,10-9-1998]**	D182.2, E193.1, E193.3, E193.4, E448.2, H23.6, K48.1
PROCESS TANK, ANODIZING, UNHEATED, RECTIFIED, AIR SPARGED, NO. 11, SULFURIC ACID, WIDTH: 6 FT; HEIGHT: 10 FT; LENGTH: 26 FT A/N: 494830 Permit to Construct Issued: 11/18/09	D24				
PROCESS TANK, UNHEATED, AIR SPARGED, NO. 13, CONVERSION COATING, TRISODIUM PHOSPHATE, POTASSIUM FLUORIDE, WIDTH: 3 FT; HEIGHT: 7 FT; LENGTH: 26 FT A/N: 494830 Permit to Construct Issued: 11/18/09	D25				
PROCESS TANK, UNHEATED, AIR SPARGED, NO. 14, CLEANING, NITRIC ACID, WIDTH: 3 FT; HEIGHT: 7 FT; LENGTH: 26 FT A/N: 494830 Permit to Construct Issued: 11/18/09	D26				

* (1)(1A)(1B) Denotes RECLAIM emission factor
(2)(2A)(2B) Denotes RECLAIM emission rate
(3) Denotes RECLAIM concentration limit
(4) Denotes BACT emission limit
(5)(5A)(5B) Denotes command and control emission limit
(6) Denotes air toxic control rule limit
(7) Denotes NSR applicability limit
(8)(8A)(8B) Denotes 40 CFR limit(e.g. NSPS, NESHAPS,etc.)
(9) See App B for Emission Limits
(10) See Section J for NESHAP/MACT requirements

** Refer to Section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

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The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 2 : SURFACE PREPARATION					
PROCESS TANK, UNHEATED, AIR SPARGED, NO. 16, ETCHING, NITRIC ACID, AMMONIUM BIFLUORIDE, WIDTH: 3 FT; HEIGHT: 7 FT; LENGTH: 26 FT A/N: 494830 Permit to Construct Issued: 11/18/09	D27	C44			
PROCESS TANK, HEATED, NO. 19, SEALING, SODIUM CHROMATE, CHROMIC ACID, WIDTH: 3 FT; HEIGHT: 9 FT; LENGTH: 26 FT A/N: 494830 Permit to Construct Issued: 11/18/09	D28				
PROCESS TANK, HEATED, NO. 21, CONVERSION COATING, ALODINE, WIDTH: 3 FT; HEIGHT: 9 FT; LENGTH: 26 FT A/N: 494830 Permit to Construct Issued: 11/18/09	D29				

* (1)(1A)(1B) Denotes RECLAIM emission factor
(2)(2A)(2B) Denotes RECLAIM emission rate
(3) Denotes RECLAIM concentration limit
(4) Denotes BACT emission limit
(5)(5A)(5B) Denotes command and control emission limit
(6) Denotes air toxic control rule limit
(7) Denotes NSR applicability limit
(8)(8A)(8B) Denotes 40 CFR limit(e.g. NSPS, NESHAPS,etc.)
(9) See App B for Emission Limits
(10) See Section J for NESHAP/MACT requirements

** Refer to Section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE
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SECTION H: DEVICE ID INDEX

The following sub-section provides an index to the devices that make up the facility description sorted by device ID.

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SECTION H: DEVICE ID INDEX

Device Index For Section H			
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D14	1	2	1
D15	1	2	1
D16	1	2	1
D17	2	2	1
D18	2	2	1
D19	3	2	1
D20	3	2	2
D21	3	2	2
D22	3	2	2
D23	4	2	2
D24	4	2	2
D25	4	2	2
D26	4	2	2
D27	5	2	2
D28	5	2	2
D29	5	2	2
D39	2	2	1
D62	2	2	1
D81	3	2	2

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SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

FACILITY CONDITIONS

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SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

F2.1 The operator shall limit emissions from this facility as follows:

CONTAMINANT	EMISSIONS LIMIT
Single Volatile Hazardous Air Pollutant (VHAP)	Less than 10 TONS IN ANY ONE YEAR
Combination of Volatile Hazardous Air Pollutants (VHAPs)	Less than 25 TONS IN ANY ONE YEAR

To maintain exmption from the national emission standards for hazardous air pollutants (NESHAP) requirements, the operator shall comply with the Volatile Hazardous Air Pollutant (VHAP) emission limits of this condition

To ensure compliance with the monthly emission caps of this condition, the facility operator shall:

(a) In addition to the recordkeeping requirements of rule 109, keep adequate records for this equipment and this facility to verify the monthly hap emissions in pounds and the hap content of each material as applied (including water and exempt compounds). the records shall be prepared in a format which is acceptable to the district

(b) Within 14 calendar days after the end of each month, total and record hap emissions for the month from all equipment and operations that are required to have written permits or are exempt from written permits pursuant to rule 219. the record shall include any procedures used to account for control device efficiencies and/or waste disposal. it shall be signed and certified for accuracy by the highest ranking individual responsible for compliance with district rules

(c) Maintain a single list which includes only the name and address of each person from whom the facility acquired hap-containing material regulated by the district that was used or stored at the facility during the preceding 12 months

(d) Retain all purchase invoices for all hap-containing material used or stored at the facility, and all waste manifests for all waste hap-containing material removed from the facility, for five years

(e) All records required by this permit shall be prepared in a format which is acceptable to the district, retained at the facility for five years, and made available to any district representative upon request

[40CFR 63 Subpart GG, 12-8-2000]

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SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

F9.1 Except for open abrasive blasting operations, the operator shall not discharge into the atmosphere from any single source of emissions whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is:

(a) As dark or darker in shade as that designated No.1 on the Ringelmann Chart, as published by the United States Bureau of Mines; or

(b) Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subparagraph (a) of this condition.

[**RULE 401, 3-2-1984**; RULE 401, 11-9-2001]

F14.1 The operator shall not use fuel oil containing sulfur compounds in excess of 0.05 percent by weight.

[**RULE 431.2, 5-4-1990**; RULE 431.2, 9-15-2000]

F14.2 The operator shall not purchase diesel fuel containing sulfur compounds in excess of 15 ppm by weight as supplied by the supplier.

[RULE 431.2, 9-15-2000]

DEVICE CONDITIONS

D. Monitoring/Testing Requirements

FACILITY PERMIT TO OPERATE
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SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

D182.2 The operator shall test this equipment in accordance with the following specifications:

The test shall be conducted according to the District approved protocol. A written report shall be submitted to the District within 30 days after the test is completed. The report shall include items as listed in ST-1 & ST-2 Form.

The test shall be conducted The test shall be conducted within thirty (30) days of the permit issuance date or within thirty (30) days of the start of operation of the equipment after the filter membrane cover is installed..

The test of D17 and D23 shall determine the total emission rate of hexavalent chromium and total chromium at the outlet of the membranes and in the head space in mg/amp-hr.

The test of D17 & D23 shall determine the seal integrity of the water-sealed cover pursuant to Rule 1469.

The District engineer identified on this conditional permit to construct shall be notified of the date and time of the test at least 10 days prior to the test.

The cover of Device Nos. D17 & D23 shall remained closed at all times, except when loading and unloading of parts.

[**RULE 1469, 10-9-1998**; RULE 1469, 5-2-2003; RULE 1469, 12-5-2008]

[Devices subject to this condition : D17, D23]

E. Equipment Operation/Construction Requirements

FACILITY PERMIT TO OPERATE
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SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

E193.1 The operator shall construct, operate, and maintain this equipment according to the following requirements:

This tank shall be equipped with a continuous recording, non-resettable, ampere-hour meter that operates on the electrical power lines and measures the amount of electrical current applied to the tank or rectifier. A separate meter shall be hard-wired for each rectifier. The meters shall be mounted in a location such that they are easily readable. The operator shall inspect and maintain the ampere-hour meter(s) according to the manufacturer's recommendations.

An identification tag or label shall be affixed to all rectifiers in a permanent and conspicuous position. The identification marker shall be maintained in legible condition and contain the rectifier identification number, maximum rectifier amperage and identification numbers of tanks utilizing the rectifier.

Record the actual cumulative rectifier usage of this anodizing tank used during each calendar month of the reporting period, and the total capacity used to date for each calendar year.

A log concerning the operation of this equipment shall be kept on file for a minimum of 5 years. The past 2 years' records shall be kept on site & shall be made available to any District representative upon request. This log shall contain: A) The records required by the conditions in this permit B) At least once per month, the total ampere-hours applied to this tank & the cumulative total of amp-hours applied to this tank to date for the current calendar year

The operator shall maintain records of any exceedances of the parameter limits contained in this permit. The records shall include the date of the occurrence, the duration, cause (if known), and, where possible, the magnitude of any exceedance.

[**RULE 1303(a)(1)-BACT, 5-10-1996**; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 1401, 5-3-2002]

[Devices subject to this condition : D17, D23]

FACILITY PERMIT TO OPERATE
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The operator shall comply with the terms and conditions set forth below:

E193.3 The operator shall operate and maintain this equipment according to the following requirements:

Each tank shall be clearly identified with the appropriate tank numbers as designated in the Section D equipment description. The identification and/or labeling of each tank shall be directly affixed to each tank and be easily readable.

An ongoing compliance status report for the preceding calendar year shall be completed annually, by February 1 of each year. The report shall contain the information identified in Appendix 3 of Rule 1469. The report shall be made available to AQMD personnel upon request.

Material safety data sheets (MSDS) for all materials charged to each process tank at this facility shall be kept on site and made available to any District representative upon request.

[RULE 1469, 10-9-1998]

[Devices subject to this condition : D17, D23]

E193.4 The operator shall operate and maintain this equipment according to the following requirements:

(1) The water sealed cover shall remain closed at all times, except when loading and unloading parts.

(2) The operator shall inspect all membrane filters on a weekly basis to ensure that there is no chromic acid buildup and no evidence of chemical attack that affects the structural integrity of the membranes.

(3) The operator shall not conduct any mechanical agitation, solution sparging, or air sparging in this equipment.

[RULE 1469, 12-5-2008]

[Devices subject to this condition : D17, D23]

FACILITY PERMIT TO OPERATE
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SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

The operator shall comply with the terms and conditions set forth below:

E448.2 The operator shall comply with the following requirements:

The visible emission standards of AQMD Rule 401.

Report breakdowns as required by District Rule 430, and maintain records of the occurrence, duration, and causes (if known) and action taken on each breakdown.

[RULE 1469, 12-5-2008]

[Devices subject to this condition : D17, D23]

H. Applicable Rules

H23.6 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	CR
Chromium, Hexavalent	District Rule	1469

[RULE 1469, 12-5-2008]

[Devices subject to this condition : D17, D23]

K. Record Keeping/Reporting

FACILITY PERMIT TO OPERATE
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The operator shall comply with the terms and conditions set forth below:

K48.1 The operator shall maintain records in a manner approved by the District, to demonstrate compliance with the following condition number(s):

Condition Number K 193- 1

Condition Number K 193- 3

Condition Number K 448- 2

[RULE 1469, 12-5-2008]

[Devices subject to this condition : D17, D23]