777 12th Street 3rd Floor **SACRAMENTO METROPOLITAN** Sacramento, CA 95814

AIR QUALITY

MANAGEMENT DISTRICT

STATEMENT OF BASIS FOR

1st RENEWAL OF TITLE V FEDERAL OPERATING PERMIT

Application No.:	TV2009-09-01
Date:	June 7, 2012
Evaluation By:	Jorge DeGuzman/ Bruce Nixon

A. FACILITY INFORMATION:

FACILITY NAME:	Aerojet - Sacramento Operations
LOCATION:	2001 Aerojet Road Rancho Cordova, CA 95742
MAILING ADDRESS:	P.O. Box 13222 #MS 5596 Sacramento, CA 95813-6000
PARENT COMPANY:	Aerojet - General Corporation
RESPONSIBLE OFFICIAL:	Robert Werling Vice President, Sacramento Operations Phone: (916) 355-3611
CONTACT PERSON:	Chelsea Westerberg Environmental Specialist Phone: (916) 804-2361

B. PURPOSE OF THIS STATEMENT OF BASIS:

The Title V Federal Operating Permit is intended to be a document containing only enforceable terms and conditions as well as any additional information, such as the identification of emission units, emission points, emission sources and processes that makes the terms meaningful. 40 CFR Part 70.7(a)(5) requires that each Title V permit have an accompanying "...statement that sets forth the legal and factual basis for the draft permit conditions". The purpose of this Statement of Basis is to satisfy the above requirement by providing pertinent details regarding the permit/application data and permit conditions in a more easily understandable format. This Statement of Basis will also include background narrative and explanations of regulatory decisions made by the reviewer. It should be emphasized that this Statement of Basis, while based on information contained in the permit, is a separate document and is not itself an enforceable term and condition of the permit.

C. TITLE V PERMIT HISTORY

This Statement of Basis is for the first renewal of Aerojet's current Title V Federal Operating Permit No. TV1996-09-02.

The current permit was to expire on March 01, 2009 but has been extended because the SMAQMD did not act on the permit renewal application by that date [see SMAQMD Rule 207 Section 303.2]. Aerojet submitted a timely and complete Title V application for permit renewal on February 29, 2008.

The following permit actions have occurred since the initial Title V Federal Operating Permit No. TV1996-09-01 was issued:

Permit Action	Date Issued	Permit No.
Initial Title V Federal Operating Permit	03-01-2004	TV1996-09-01
1st Minor Modification	07-23-2007	TV1996-09-02

This 1st renewal of the Title V permit will be assigned the permit number TV2009-09-01.

D. FACILITY DESCRIPTION

Aerojet's primary activities include manufacturing Propulsion Systems and Parts (SIC Code 3764) and Ordnance- Armaments (SIC Code 3489):

1. Propulsion Systems and Parts:
   Aerojet manufactures liquid (e.g. Delta, Titan, NK-33) and solid (e.g. AMRAAM, Hawk, Standard Missile, Minuteman) propulsion systems and aerospace components (e.g. F-22 boom) in support of government and commercial contracts. The components can be fabricated, assembled, tested and/or refurbished by Aerojet.

2. Ordnance- Armaments:
   Aerojet manufactures ordnance items in support of government and commercial contracts. The ordnance can be fabricated, assembled, tested and/or refurbished by Aerojet.

The activities listed above are supported by boilers, internal combustion engines, rocket motor test stands, paint booths, abrasive blasting processes, baghouses, scrubbers, gasoline dispensing equipment and general maintenance equipment. Research and development and testing are also performed at this facility.

E. SMAQMD RULE 201 PERMITTING ACTIONS RELATED TO THE TITLE V PERMIT

Below is a description of SMAQMD Rule 201 permit actions that have taken place since the last modification to the Title V permit through the date 09-01-2011.

PERMIT CANCELLATIONS: The following equipment with the specified P/O No. has been removed or is no longer in use and will not be included in the Title V permit renewal. Equipment that was modified will be included in the Title V permit renewal but with a different referenced SMAQMD Rule 201 P/O No.

Cancelled SMAQMD Rule 201 Permits to Operate			
P/O No.	Date Cancelled	Equipment Description	Reason for Cancellation
2016	01-16-2007	Test Stand	No longer in use.
2041	05-17-2007	Test Stand	Permit Modified by P/O No. 20083
3255	02-27-2008	Boiler	Permit Modified by P/O No. 20443
3256	10-29-2008	Boiler	Permit Modified by P/O No. 21000
5739	10-01-2010	APC Baghouse	No longer in use.
5996	05-04-2007	APC Baghouse	Permit Modified by P/O No. 19351
6440	03-31-2007	Boiler	Permit Modified by P/O No. 19730
6893	04-15-2010	Paint Spray Booth	No longer in use.
6981	04-16-2010	Paint Spray Booth	No longer in use.
7413	03-01-2011	APC Baghouse	No longer in use.
8263	06-30-2008	Test Stand	Permit Modified by P/O No. 21132
8457	04-21-2010	APC Baghouse	No longer in use.
9964	06-30-2008	Abrasive Blasting Booth	Permit Modified by P/O No. 20917
10303	01-16-2008	Boiler	Permit Modified by P/O No. 20438
10304	09-30-2008	Boiler	Permit Modified by P/O No. 20869
10305	09-30-2008	Boiler	Permit Modified by P/O No. 20872
10306	03-31-2007	Boiler	Permit Modified by P/O No. 19735
10307	02-27-2008	Boiler	Permit Modified by P/O No. 20440
10308	10-29-2008	Boiler	Permit Modified by P/O No. 21081
10309	09-30-2008	Boiler	Permit Modified by P/O No. 20870
10310	02-27-2008	Boiler	Permit Modified by P/O No. 20441
10314	12-12-2006	Boiler	Permit Modified by P/O No. 19748

E. SMAQMD RULE 201 PERMITTING ACTIONS RELATED TO THE TITLE V PERMIT (continued)

Cancelled SMAQMD Rule 201 Permits to Operate			
P/O No.	Date Cancelled	Equipment Description	Reason for Cancellation
10315	04-30-2007	Boiler	No longer in use.
10317	12-12-2006	Boiler	Permit Modified by P/O No. 19749
10319	11-30-2008	Boiler	Permit Modified by P/O No. 20873
10321	10-29-2008	Boiler	Permit Modified by P/O No. 21080
10322	03-31-2007	Boiler	Permit Modified by P/O No. 19733
10326	03-31-2007	Boiler	Permit Modified by P/O No. 19741
10327	03-31-2007	Boiler	Permit Modified by P/O No. 19742
10330	03-31-2007	Boiler	Permit Modified by P/O No. 19743
10331	03-31-2007	Boiler	Permit Modified by P/O No. 19740
10332	03-05-2008	Boiler	Permit Modified by P/O No. 20439
10333	12-12-2006	Boiler	Permit Modified by P/O No. 19737
10334	03-31-2007	Boiler	Permit Modified by P/O No. 19738
10337	12-20-2006	Boiler	Permit Modified by P/O No. 19729
10339	04-30-2008	Boiler	Permit Modified by P/O No. 20600
10341	03-31-2007	Boiler	Permit Modified by P/O No. 19739
10342	03-31-2007	Boiler	Permit Modified by P/O No. 19750
10353	11-30-2008	Boiler	Permit Modified by P/O No. 21083
10355	02-03-2009	Boiler	The boiler is de-rated to < 1 MMBTU/hr
10356	03-31-2007	Boiler	Permit Modified by P/O No. 19747
10358	01-24-2008	Boiler	Permit Modified by P/O No. 19731
10361	03-05-2008	Boiler	Permit Modified by P/O No. 19746
10378	02-06-2009	APC Baghouse	No longer in use.
10421	03-31-2010	IC Engine Standby	No longer in use.
10779	07-16-2008	IC Engine Standby	Equipment has been removed.
12357	03-31-2007	Boiler	Permit Modified by P/O No. 19744
12358	03-31-2007	Boiler	Permit Modified by P/O No. 19745
12363	01-29-2009	Boiler	Permit Modified by P/O No. 21146
12364	04-18-2008	Boiler	Permit Modified by P/O No. 20442

E. SMAQMD RULE 201 PERMITTING ACTIONS RELATED TO THE TITLE V PERMIT (continued)

Cancelled SMAQMD Rule 201 Permits to Operate			
P/O No.	Date Cancelled	Equipment Description	Reason for Cancellation
12366	01-29-2009	Boiler	Permit Modified by P/O No. 21145
12367	05-21-2009	Boiler	Permit Modified by P/O No. 21605
12368	04-07-2011	Boiler	No longer in use.
12376	04-30-2007	Boiler	Permit Modified by P/O No. 19751
12377	04-10-2008	Boiler	Permit Modified by P/O No. 20601
12378	04-30-2008	Boiler	Permit Modified by P/O No. 20602
12933	01-24-2008	Boiler	Permit Modified by P/O No. 19732
12935	04-10-2008	Boiler	Permit Modified by P/O No. 20599
13556	10-29-2008	Boiler	Permit Modified by P/O No. 21084
13558	03-31-2007	Boiler	Permit Modified by P/O No. 19752
13560	01-29-2009	Boiler	Permit Modified by P/O No. 21141
13561	01-29-2009	Boiler	Permit Modified by P/O No. 21142
13562	01-29-2009	Boiler	Permit Modified by P/O No. 21143
13563	03-31-2011	Autoclave	No longer in use.
14512	08-20-2007	Dust Collector	Permit Modified by P/O No. 20418
15126	08-17-2009	PM Handling System	Permit Modified by P/O No. 21653
15335	11-03-2009	IC Engine Standby	Permit Modified by P/O No. 21136
15436	09-30-2008	Boiler	Permit Modified by P/O No. 21203
16049	11-30-2008	Boiler	Permit Modified by P/O No. 21082
17638	02-28-2007	Rocket Test Stand	Permit Modified by P/O No. 18769
17830	10-09-2008	Aerospace Misc. Coating	Permit Modified by P/O No. 21140
18053	01-29-2009	Boiler	Permit Modified by P/O No. 21144
18118	11-30-2008	Liquid Waste Vol Reduction	No longer in use.
18650	05-17-2010	Abrasive Blasting	Permit Modified by P/O No. 22040
18651	02-27-2008	Abrasive Blasting	Permit Modified by P/O No. 20485
18769	04-22-2008	Rocket Test Stand	Permit Modified by P/O No. 20703
18793	05-04-2007	Miscellaneous	Permit Modified by P/O No. 20030
18840	04-22-2008	Aerospace Misc. Coating	Permit Modified by P/O No. 20652

E. SMAQMD RULE 201 PERMITTING ACTIONS RELATED TO THE TITLE V PERMIT (continued)

Cancelled SMAQMD Rule 201 Permits to Operate			
P/O No.	Date Cancelled	Equipment Description	Reason for Cancellation
19351	09-20-2010	APC Baghouse	Permit Modified by P/O No. 22170
19730	05-31-2007	Boiler/Heater	No longer in use.
19736	04-30-2007	Boiler/Heater	P/O No.10308 (the permit replaced by this one) has been re-instated.
19738	10-04-2010	Boiler/Heater	No longer in use.
19739	10-04-2010	Boiler/Heater	No longer in use.
19740	10-04-2010	Boiler/Heater	No longer in use.
19741	10-04-2010	Boiler/Heater	No longer in use.
19742	10-04-2010	Boiler/Heater	No longer in use.
19743	10-04-2010	Boiler/Heater	No longer in use.
19744	03-31-2010	Boiler/Heater	No longer in use.
19745	03-31-2010	Boiler/Heater	No longer in use.
19746	02-05-2008	Boiler/Heater	Permit Modified by P/O No. 20313
20030	02-27-2008	Chem Manuf Process	Permit Modified by P/O No. 20492
20083	06-30-2008	Rocket Test Stand	Permit Modified by P/O No. 21015
20418	06-18-2010	APC Baghouse	Permit Modified by P/O No. 22225
20485	05-17-2010	Abrasive Blasting	Permit Modified by P/O No. 22029
20599	01-29-2009	Boiler	Permit Modified by P/O No. 21147
21153	08-31-2010	APC Baghouse	Permit Modified by P/O No. 22438

E. SMAQMD RULE 201 PERMITTING ACTIONS RELATED TO THE TITLE V PERMIT (continued)

NEW PERMITS: The following SMAQMD Rule 201Permits to Operate have been issued since the last Title V modification through the date 09-01-2011. These new Permits to Operate will be incorporated into the Title V permit renewal.

New SMAQMD Rule 201 Permits to Operate		
P/O No.	Date Issued	Description
19729	12-19-2006	1.26 MMBTU/hr Boiler - Modification of P/O No. 10337 to comply with SMAQMD Rule 411 by taking a fuel restriction of 40,000 therms per year.
19731	01-22-2008	2.1 MMBTU/hr Boiler - Modification of P/O No. 10358 to comply with SMAQMD Rule 411 by taking a fuel restriction of 40,000 therms per year.
19732	01-22-2008	2.52 MMBTU/hr Boiler - Modification of P/O No. 12933 to comply with SMAQMD Rule 411 by taking a fuel restriction of 70,000 therms per year.
19733	03-29-2007	2.94 MMBTU/hr Boiler - Modification of P/O No. 10322 to comply with SMAQMD Rule 411 by taking a fuel restriction of 70,000 therms per year.
19735	03-29-2007	1.6 MMBTU/hr Boiler - Modification of P/O No. 10306 to comply with SMAQMD Rule 411 by taking a fuel restriction of 40,000 therms per year.
19737	12-11-2006	3.36 MMBTU/hr Boiler - Modification of P/O No. 10333 to comply with SMAQMD Rule 411 by taking a fuel restriction of 70,000 therms per year.
19738	03-29-2007	2.8 MMBTU/hr Boiler - Modification of P/O No. 10334 to comply with SMAQMD Rule 411 by taking a fuel restriction of 70,000 therms per year.
19739	03-29-2007	2.52 MMBTU/hr Boiler - Modification of P/O No. 10341 to comply with SMAQMD Rule 411 by taking a fuel restriction of 70,000 therms per year.
19740	03-29-2007	2.1 MMBTU/hr Boiler - Modification of P/O No. 10331 to comply with SMAQMD Rule 411 by taking a fuel restriction of 40,000 therms per year.
19741	03-29-2007	2.1 MMBTU/hr Boiler - Modification of P/O No. 10326 to comply with SMAQMD Rule 411 by taking a fuel restriction of 40,000 therms per year.
19742	03-29-2007	2.1 MMBTU/hr Boiler - Modification of P/O No. 10327 to comply with SMAQMD Rule 411 by taking a fuel restriction of 40,000 therms per year.

E. SMAQMD RULE 201 PERMITTING ACTIONS RELATED TO THE TITLE V PERMIT (continued)

New SMAQMD Rule 201 Permits to Operate		
P/O No.	Date Issued	Description
19743	03-29-2007	2.1 MMBTU/hr Boiler - Modification of P/O No. 10330 to comply with SMAQMD Rule 411 by taking a fuel restriction of 40,000 therms per year.
19744	03-29-2007	20.9 MMBTU/hr Boiler - Modification of P/O No. 12357 to comply with SMAQMD Rule 411 by taking a fuel restriction of 200,000 therms per year.
19745	03-29-2007	20.9 MMBTU/hr Boiler - Modification of P/O No. 12358 to comply with SMAQMD Rule 411 by taking a fuel restriction of 2000,000 therms per year.
19747	03-29-2007	2.1 MMBTU/hr Boiler - Modification of P/O No. 10356 to comply with SMAQMD Rule 411 by taking a fuel restriction of 40,000 therms per year.
19748	12-11-2006	1.26 MMBTU/hr Boiler - Modification of P/O No. 10314 to comply with SMAQMD Rule 411 by taking a fuel restriction of 40,000 therms per year.
19749	12-11-2006	1.26 MMBTU/hr Boiler - Modification of P/O No. 10317 to comply with SMAQMD Rule 411 by taking a fuel restriction of 40,000 therms per year.
19750	03-29-2007	1.47 MMBTU/hr Boiler - Modification of P/O No. 10342 to comply with SMAQMD Rule 411 by taking a fuel restriction of 40,000 therms per year.
19751	04-02-2007	5.25 MMBTU/hr Boiler - Modification of P/O No. 12376 to comply with SMAQMD Rule 411 by taking a fuel restriction of 200,000 therms per year.
19752	03-29-2007	1.3 MMBTU/hr Boiler - Modification of P/O No. 13558 to comply with SMAQMD Rule 411 by taking a fuel restriction of 40,000 therms per year.
20313	03-04-2008	1.7 MMBTU/hr Boiler - Replacing P/O No. 19746 to comply with SMAQMD Rule 411.
20384	01-22-2008	3.45 MMBTU/hr Boiler
20418	08-10-2007	APC Baghouse - Modification of P/O No. 14512
20419	12-14-2007	Depaint Process

E. SMAQMD RULE 201 PERMITTING ACTIONS RELATED TO THE TITLE V PERMIT (continued)

New SMAQMD Rule 201 Permits to Operate		
P/O No.	Date Issued	Description
20438	01-11-2008	4.2 MMBTU/hr Boiler - Modification of P/O No. 10303 to comply with SMAQMD Rule 411 by replacing the burner.
20439	03-04-2008	2.5 MMBTU/hr Boiler - Modification of P/O No. 10332 to comply with SMAQMD Rule 411 by replacing the burner.
20440	02-22-2008	1.7 MMBTU/hr Boiler - Modification of P/O No. 10307 to comply with SMAQMD Rule 411 by replacing the burner.
20441	02-26-2008	2.1 MMBTU/hr Boiler - Modification of P/O No. 10310 to comply with SMAQMD Rule 411 by replacing the burner.
20442	04-16-2008	6.3 MMBTU/hr Boiler - Modification of P/O No. 12364 to comply with SMAQMD Rule 411 by replacing the burner.
20443	02-22-2008	4.2 MMBTU/hr Boiler - Modification of P/O No. 3255 to comply with SMAQMD Rule 411 by replacing the burner.
20485	02-22-2008	Abrasive Blasting - Modification of P/O No. 18651
20492	02-22-2008	Chemical Process - Modification of P/O No. 20030
20600	04-10-2008	4.2 MMBTU/hr Boiler - Modification of P/O No. 10339 to comply with SMAQMD Rule 411 by taking a fuel restriction of 70,000 therms per year.
20601	04-10-2008	5.25 MMBTU/hr Boiler - Replacing P/O No. 12377 to comply with SMAQMD Rule 411 by taking a fuel restriction of 200,000 therms per year.
20602	04-10-2008	5.28 MMBTU/hr Boiler - Replacing P/O No. 12378 to comply with SMAQMD Rule 411 by taking a fuel restriction of 200,000 therms per year.
20652	04-21-2008	Aerospace Misc. Coating - Modification of P/O No. 18840
20703	04-21-2008	Rocket Test Stand - Modification of P/O No. 18769

E. SMAQMD RULE 201 PERMITTING ACTIONS RELATED TO THE TITLE V PERMIT (continued)

New SMAQMD Rule 201 Permits to Operate		
P/O No.	Date Issued	Description
20869	09-23-2008	4.2 MMBTU/hr Boiler - Modification of P/O No. 10304 to comply with SMAQMD Rule 411 by taking an enforceable emission limit compliant with SMAQMD Rule 411.
20870	09-23-2008	2.1 MMBTU/hr Boiler - Modification of P/O No. 10309 to comply with SMAQMD Rule 411 by taking an enforceable emission limit compliant with SMAQMD Rule 411.
20872	09-23-2008	2.5 MMBTU/hr Boiler - Modification of P/O No. 10305 to comply with SMAQMD Rule 411 by taking an enforceable emission limit compliant with SMAQMD Rule 411.
20873	11-25-2008	4.2 MMBTU/hr Boiler - Modification of P/O No. 10319 to comply with SMAQMD Rule 411 by de-rating the boiler/burner.
20917	06-13-2008	Abrasive Blasting Booth - Modification of P/O No. 9964
21000	10-30-2008	3.36 MMBTU/hr Boiler - Modification of P/O No. 3256 to comply with SMAQMD Rule 411 by taking a fuel restriction of 70,000 therms per year.
21015	06-13-2008	Rocket Test Stand - Modification of P/O No. 20083
21080	10-30-2008	2.94 MMBTU/hr Boiler - Modification of P/O No. 10321 to comply with SMAQMD Rule 411 by taking a fuel restriction of 70,000 therms per year.
21081	10-30-2008	1.68 MMBTU/hr Boiler - Modification of P/O No. 10308 to comply with SMAQMD Rule 411 by taking a fuel restriction of 40,000 therms per year.
21082	11-25-2008	2.1 MMBTU/hr Boiler - Modification of P/O No. 16049 to comply with SMAQMD Rule 411 by replacing the burner.
21083	11-25-2008	2.9 MMBTU/hr Boiler - Modification of P/O No. 10353 to comply with SMAQMD Rule 411 by replacing the burner.

E. SMAQMD RULE 201 PERMITTING ACTIONS RELATED TO THE TITLE V PERMIT (continued)

New SMAQMD Rule 201 Permits to Operate		
P/O No.	Date Issued	Description
21084	10-30-2008	2.5 MMBTU/hr Boiler - Modification of P/O No. 13556 to comply with SMAQMD Rule 411 by taking a fuel restriction of 70,000 therms per year.
21132	06-17-2008	Rocket Test Stand - Modification of P/O No. 8263
21136	11-02-2009	568 hp IC Engine Standby, Portable - Modification to P/O No. 15335
21140	10-17-2008	Aerospace Miscellaneous Coating - Modification of P/O No. 17830
21141	01-29-2009	4.85 MMBTU/hr Boiler - Modification of P/O No. 13560 to comply with SMAQMD Rule 411 by de-rating the boiler/burner.
21142	01-29-2009	4.8 MMBTU/hr Boiler - Modification of P/O No. 13561 to comply with SMAQMD Rule 411 by de-rating the boiler/burner.
21143	01-29-2009	4.3 MMBTU/hr Boiler - Modification of P/O No. 13562 to comply with SMAQMD Rule 411 by de-rating the boiler/burner.
21144	01-29-2009	4.3 MMBTU/hr Boiler - Modification of P/O No. 18053 to comply with SMAQMD Rule 411 by de-rating the boiler/burner.
21145	01-29-2009	4.9 MMBTU/hr Boiler - Modification of P/O No. 12366 to comply with SMAQMD Rule 411 by de-rating the boiler/burner.
21146	01-29-2009	4.5 MMBTU/hr Boiler - Modification of P/O No. 12363 to comply with SMAQMD Rule 411 by de-rating the boiler/burner.
21147	01-29-2009	4.2 MMBTU/hr Boiler - Modification of P/O No. 20599 to comply with SMAQMD Rule 411 by de-rating the boiler/burner.
21153	08-01-2008	APC Baghouse
21203	09-23-2008	4.9 MMBTU/hr Boiler - Modification of P/O No. 15436 to comply with SMAQMD Rule 411 by taking an enforceable emission limit compliant with SMAQMD Rule 411.

E. SMAQMD RULE 201 PERMITTING ACTIONS RELATED TO THE TITLE V PERMIT (continued)

New SMAQMD Rule 201 Permits to Operate		
P/O No.	Date Issued	Description
21605	05-21-2009	8.4 MMBTU/hr Boiler - Modification of P/O No. 12367 to comply with SMAQMD Rule 411 by replacing burner with Low-NOx burner
21619	01-28-2009	IC Engine, emergency use, 619 hp
21653	08-06-2009	APC Baghouse - Modification of APC baghouse P/O No. 15126 to allow for venting of asbestos-containing exhaust air from machining rocket nozzles
21734	05-14-2010	Mandrel manufacturing process
21766	11-02-2009	APC Baghouse, 1520 ft2, 10 hp fan, 5,000 cfm capacity.
21973	05-14-2010	APC Baghouse, 264 ft2, 7.5 hp fan, 2000cfm capacity
22018	06-28-2011	Paint spray booth
22029	05-14-2010	Abrasive Blasting Modification of P/O No. 20485
22040	05-14-2010	Abrasive Blasting Modification of P/O No. 18650
22170	05-14-2010	APC Baghouse Modification of P/O No. 19351
22225	06-15-2010	APC Baghouse Modification of P/O No. 20418
22438	08-09-2010	APC Baghouse Modification of P/O No. 21153

F. INSIGNIFICANT EMISSIONS UNIT INFORMATION

Section B of the permittee's Title V permit application contains a list of insignificant emission units operated at the facility. The table below summarizes the list contained in Section B of the permittee's Title V permit application.

These emission units are considered insignificant emission sources and are listed in the Title V permit as such.

Equipment Category as Listed in the SMAQMD Title V List and Criteria "List of Insignificant Activities", adopted 04-26-2001	Basis for Exemption	Equipment (for details of equipment see Section B of the permittee's Title V permit application)
I. General Criteria for Insignificant Activities	1. Not subject to a source-specific requirement of a State Implementation Plan and Emits no more than 0.5 tons per year of a federal hazardous air pollutant (HAP) and no more than two tons per year of a regulated pollutant that is not a HAP	a. Unregulated Tanks A number of etching tanks, cleaning tanks, rinse tanks, storage tanks, dip tanks, etc. b. Various emission units that emit less than 2 lb/day. c. HVAC equipment. d. General Repairs and Maintenance. This includes operations such as the weld shop, plant-wide janitorial services and general maintenance.
II.A Fugitive Emission Sources Associated with Insignificant Activities	1. Fugitive emissions sources associated with insignificant activities	
II.B Combustion and Heat Transfer Equipment	1. Combustion equipment with maximum heat input ≤ 5,000,000 BTU/hour and exclusively fired with natural gas or LPG (propane) 2. Piston-type internal combustion engine with rating < 50bhp	a. Space Heaters b. Boilers c. IC Engines

F. INSIGNIFICANT EMISSIONS UNIT INFORMATION (continued)

Equipment Category as Listed in the SMAQMD Title V List and Criteria "List of Insignificant Activities", adopted 04-26-2001	Basis for Exemption	Equipment (for details of equipment see Section B of the permittee's Title V permit application)
II.C Cooling Towers	1. Any water cooling tower which: 1) has a circulation rate of less than 10,000 gallons per minute; and 2) is not used to cool process water, water from barometric jets, or water from barometric condensers	NA
II.D Printing and Reproduction Equipment	1. Any printing, coating, or laminating activity which uses no more than two gallons per day of graphic arts materials, including: inks, coatings, adhesives, fountain solutions, thinners, retarders, or cleaning solutions. 2. Any laser printing equipment.	Office printers, fax and copiers
II.E Food Processing Equipment	NA	NA
II.F Plastic and / or Rubber Processing Equipment	NA	NA
II.G Storage Containers, Reservoirs, and Tanks - Fuel, Fuel Oil and Asphalt	1. Any equipment used exclusively for the storage of fuel oils or non-air-blown asphalt with specific gravity 0.9042 or higher (25o API or lower) as determined by API test method 2547 or ASTM test method D-1298-80.	a. Fuel storage tanks for diesel and JP10.

F. INSIGNIFICANT EMISSIONS UNIT INFORMATION (continued)

Equipment Category as Listed in the SMAQMD Title V List and Criteria "List of Insignificant Activities", adopted 04-26-2001	Basis for Exemption	Equipment (for details of equipment see Section B of the permittee's Title V permit application)
II.H Storage Containers, Reservoirs, and Tanks - General Organic and VOC-Containing Material	1. Any equipment used exclusively for the storage of unheated organic material with: a. An initial boiling point of 150° C [302° F] or greater as determined by ASTM test method 1078-86); or b. A vapor pressure of no more than five millimeters mercury (mmHg) [0.1 pound per square inch (psi) absolute] as determined by ASTM test method D-2879-86. 2. Any equipment with a capacity of no more than 250 gallons used exclusively for the storage of unheated organic liquid. 3. Any equipment with a capacity of no more than 6,077 gallons used exclusively for the underground storage of unheated organic liquid with a vapor pressure no more than 75 mm Hg (1.5 psi absolute) as determined by ASTM test method D-2879-86.	a. Tanks containing liquids with Vp ≤ 77.5 mm Hg and < 6076 Gal Capacity These tanks contain mainly motor oil, kerosene, Kodak Rp developer solution, butyl acetate, xylene, IPA and hydraulic oil. b. Unheated, non-conveyorized solvent rinsing containers and dip tanks.
II.I Storage Containers, Reservoirs, and Tanks - Inorganic Material	NA	NA

F. INSIGNIFICANT EMISSIONS UNIT INFORMATION (continued)

Equipment Category as Listed in the SMAQMD Title V List and Criteria "List of Insignificant Activities", adopted 04-26-2001	Basis for Exemption	Equipment (for details of equipment see Section B of the permittee's Title V permit application)
II.J Storage Containers, Reservoirs, and Tanks - Liquefied Gases	1. Any equipment used exclusively for the storage of liquefied gases in unvented (except for emergency pressure-relief valves) pressure vessels.	a. Tanks containing liquefied or compressed gases. These tanks contain mainly LPG, liquid nitrogen, liquid argon, liquid and gaseous H2, liquid and gaseous O2 and helium.
II.K Compression and Storage of Dry Natural Gas	NA	NA
II.L Transfer Equipment	NA	NA
II.M Adhesive Application	NA	NA
II.N Surface Coating	1. Any equipment or activity using no more than one gallon per day of surface coating, or any combination of surface coating and solvent, which contains either VOC or hazardous air pollutants (HAP), or both.	Various equipment meeting the described criteria.
II.O Solvent Cleaning	1. Any equipment or activity using no more than one gallon per day of solvent, or combination of solvent and surface coating, which contains either VOC or HAP, or both. 2. Any unheated, non-conveyorized cleaning equipment (not including control enclosures): a. which has an open surface area of no more than 10.8 square feet (2 square meters)	Various equipment meeting the described criteria.

F. INSIGNIFICANT EMISSIONS UNIT INFORMATION (continued)

Equipment Category as Listed in the SMAQMD Title V List and Criteria "List of Insignificant Activities", adopted 04-26-2001	Basis for Exemption	Equipment (for details of equipment see Section B of the permittee's Title V permit application)
	and internal volume of no more than 92.5 gallons b. which uses organic solvents with an initial boiling point of 302° F or greater as determined by ASTM test method 1078-78 c. from which the owner or operator can demonstrate, through solvent purchase and use records, that less than 25 gallons per year of solvent was lost exclusive of solvent loss from recycling or disposal. 3. Any solvent wipe cleaning provided such cleaning: a. utilizes a container applicator to limit emissions (e.g., squeeze containers with narrow tips, spray bottles, dispensers with press-down caps, etc.) b. occurs at a facility which emits no more than five tons VOC (uncontrolled emissions) per calendar year from all solvent wipe-cleaning operations or which purchases no more than 1,500 gallons of solvent per calendar	

F. INSIGNIFICANT EMISSIONS UNIT INFORMATION (continued)

Equipment Category as Listed in the SMAQMD Title V List and Criteria "List of Insignificant Activities", adopted 04-26-2001	Basis for Exemption	Equipment (for details of equipment see Section B of the permittee's Title V permit application)
	year.	
II.P Abrasive Blasting	1. Any blast cleaning equipment using a suspension of abrasive material in water and the control equipment venting such blast cleaning equipment. 2. Any abrasive blast room when vented to a control device that discharges back to the room.	Various equipment meeting the described criteria.
II.Q Brazing, Soldering, Welding and Cutting Torches	1. Any brazing, soldering, welding, or cutting torch equipment used in manufacturing and construction activities and with the potential to emit hazardous air pollutant (HAP) metals, provided the total emissions of HAPs do not exceed 0.5 tons per year.	Various equipment meeting the described criteria.
II.R Solder Leveler, Hydrosqueegee, Wave Solder Machine, or Drag Solder Machine	NA	NA
II.S Metal Products	NA	NA
II.T Aerosol Can Puncturing or Crushing	NA	NA
II.U Biotechnology Manufacturing	NA	NA
II.V Textile Dyeing, Stripping or Bleaching	NA	NA

F. INSIGNIFICANT EMISSIONS UNIT INFORMATION (continued)

Equipment Category as Listed in the SMAQMD Title V List and Criteria "List of Insignificant Activities", adopted 04-26-2001	Basis for Exemption	Equipment (for details of equipment see Section B of the permittee's Title V permit application)
II.W Laboratory Fume Hoods and Vents	1. Any laboratory fume hood or vent, provided such equipment is used exclusively for the purpose of teaching, research, or quality control.	a. Laboratory equipment. These units include general lab operations, hoods and process areas.
II.X Refrigeration Units	1. Any refrigeration unit provided the unit: a. Contains less than 50 pounds of refrigerant; and b. Is not used in conjunction with air pollution control equipment.	a. Refrigeration units
NA	1. CERCLA sources that are covered by a U.S. EPA consent decree under CERCLA and thus not subject to SMAQMD Rule 201permit requirements and therefore not included in the Title V permit.	a. CERCLA Activities The permittee operates a number of air stripping towers.

G. SIGNIFICANT EMISSIONS UNIT INFORMATION

This section describes the emission units that have a current and valid SMAQMD Rule 201 Permit to Operate from the SMAQMD and are part of the Title V Federal Operating Permit.

The column heading "PO No." refers to the assigned SMAQMD Rule 201 Permit to Operate number.

1. IC Engine, Emergency Use/Electrical Generator, ≤ 500 hp, Diesel Fuel

PO No.	Rating (hp)	Manufacturer/ Model No./ Serial No./	Location/ Building	Maximum Hours of Operation	
				Maintenance	Emergency + Maintenance
10294	50	Cummins 6A3-4-G1 53132157	J-Area	20 hr/yr	24 hr/day 200 hr/qtr 200 hr/yr
10423	299	Caterpillar 3208 5YF00294	30015	20 hr/yr	24 hr/day 200 hr/qtr 200 hr/yr
10426	134	GM Detroit 10437305 4A0214108	20022	20 hr/yr	24 hr/day 200 hr/qtr 200 hr/yr
14748	335	Generac 99A06418-5 2051487	20001	30 hr/yr	24 hr/day 200 hr/qtr 200 hr/yr
18758	153	John Deere 40445H PE4045H513942	00003	50 hr/yr	24 hr/day 200 hr/qtr 200 hr/yr

G. SIGNIFICANT EMISSIONS UNIT INFORMATION

2. IC Engine, Emergency Use/Electrical Generator, > 500 hp, Diesel Fuel

PO No.	Rating (hp)	Manufacturer/ Model No./ Serial No./	Location/ Building	Maximum Hours of Operation	
				Maintenance	Emergency + Maintenance
10422	830	Detroit 6A13506 DD12VF002353	Portable	20 hr/yr	24 hr/day 200 hr/qtr 200 hr/yr
21136	568	Detroit Diesel 8V-92A 8VF1777262 Retrofitted with Clean Cam Technology System (CARB executive order G-096-029-024-A) - Portable	Portable	30 hr/yr	24 hr/day 200 hr/qtr 200 hr/yr
21619	619	Caterpillar C15 FSE01980	Portable	50 hr/yr	24 hr/day 200 hr/qtr 200 hr/yr

G. SIGNIFICANT EMISSIONS UNIT INFORMATION

3. IC Engine, Emergency Use/Fire Pump, Diesel Fuel

PO No.	Rating (hp)	Manufacturer/ Model No./ Serial No./	Location/ Building	Maximum Hours of Operation	
				Maintenance	Emergency + Maintenance
10408	182	Cummins 6-BTA5.9 44675473	37013	40 hr/yr	24 hr/day 200 hr/qtr 200 hr/yr
10434	115	GM Detroit 4061A 4A-29520	00017	40 hr/yr	24 hr/day 200 hr/qtr 200 hr/yr
10435	115	GM Detroit 4061A 4A-29519	00017	40 hr/yr	24 hr/day 200 hr/qtr 200 hr/yr
10436	115	GM Detroit 4061A 4A-29518	00017	40 hr/yr	24 hr/day 200 hr/qtr 200 hr/yr
10437	250	GM Detroit unknown 313596	00017	40 hr/yr	24 hr/day 200 hr/qtr 200 hr/yr
10438	115	GM Detroit 4061A 4A-29521	00017	40 hr/yr	24 hr/day 200 hr/qtr 200 hr/yr
10439	152	Cummins NT-495-FP 25147741	20007	40 hr/yr	24 hr/day 200 hr/qtr 200 hr/yr

G. SIGNIFICANT EMISSIONS UNIT INFORMATION

3. IC Engine, Emergency Use/Fire Pump, Diesel Fuel (continued)

PO No.	Rating (hp)	Manufacturer/ Model No./ Serial No./	Location/ Building	Maximum Hours of Operation	
				Maintenance	Emergency + Maintenance
10440	152	Cummins NT-495-FP 25149920	20010	40 hr/yr	24 hr/day 200 hr/qtr 200 hr/yr
10441	115	GM Detroit 4061A APD B51852	15011	40 hr/yr	24 hr/day 200 hr/qtr 200 hr/yr
10442	115	GM Detroit 4061A APD B51851	15011	40 hr/yr	24 hr/day 200 hr/qtr 200 hr/yr
10443	340	Cummins NT-855-F3 11422248	46046	40 hr/yr	24 hr/day 200 hr/qtr 200 hr/yr
10444	340	Cummins NT-855-F3 11422553	46046	40 hr/yr	24 hr/day 200 hr/qtr 200 hr/yr
10445	170	Cummins NY-495-FP 25155927	32010	40 hr/yr	24 hr/day 200 hr/qtr 200 hr/yr
10446	340	Cummins NT-855-F3 11422554	32010	40 hr/yr	24 hr/day 200 hr/qtr 200 hr/yr

G. SIGNIFICANT EMISSIONS UNIT INFORMATION

4. IC Engine, Emergency Use/Electrical Generator, Propane Fuel

P/O No.	Rating (hp)	Manufacturer/ Model No./ Serial No./	Location/ Building	Maximum Hours of Operation	
				Maintenance	Emergency
10424	84	Generac SG5034150 821288/AGC209099	20015 portable	100 hr/yr	Unlimited during emergencies

G. SIGNIFICANT EMISSIONS UNIT INFORMATION

5. Boiler, Small (Heat Input < 5 MMBTU/hr)

P/O No.	Rating (MMBTU/hr)	Manufacturer/ Model No./ Serial No./	Fuel	Operating Schedule	Location/ Building	Equipment Use
12918	3.03	Kewanee L3S-70-G 867701	Natural Gas	8 hr/day 5 day/wk 50 wk/yr	20004	Steam generation for use as process/comfort heat.
14603	4.25	Hearst 5622 S500-160-1	Natural Gas	8 hr/day 5 day/wk 50 wk/yr	20019A	Steam generation for use as process/comfort heat.
19729	1.26	ABCO 30C 8706	Natural Gas	8 hr/day 5 day/wk 50 wk/yr	00006	Steam generation for use as process/comfort heat.
19731	2.1	Cleaver Brooks M4W-2000 G-13445-M4	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	Various Locations (portable backup)	This boiler is used on a standby basis as a replacement unit for a boiler which is permanently connected to a fuel source and taken out of service for maintenance purposes or because of a breakdown.
19732	2.52	ABCO 60C 8714	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	Various Locations (portable backup)	This boiler is used on a standby basis as a replacement unit for a boiler which is permanently connected to a fuel source and taken out of service for maintenance purposes or because of a breakdown.

G. SIGNIFICANT EMISSIONS UNIT INFORMATION

5. Boiler, Small (Heat Input < 5 MMBTU/hr) (continued)

P/O No.	Rating (MMBTU/hr)	Manufacturer/ Model No./ Serial No./	Fuel	Operating Schedule	Location/ Building	Equipment Use
19733	2.94	Ray Husky WR3-70 B7936	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	01023	Steam generation for use as process/comfort heat.
19735	1.6	Ray Husky WR3-40 B5581	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	01034	Steam generation for use as process/comfort heat.
19737	3.36	Ray Husky NB9056 N/A	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	01062	Steam generation for use as process/comfort heat.
19747	2.1	ABCO 50C 8897	Propane	8 hr/day 5 day/wk 50 wk/yr	46038	Steam generation for use as process/comfort heat.
19748	1.26	Kewanee 2775 K3595	Natural Gas	8 hr/day 5 day/wk 50 wk/yr	49011	Steam generation for use as process/comfort heat.
19749	1.26	Kewanee 2775 K7122	Natural Gas	8 hr/day 5 day/wk 50 wk/yr	49011	Steam generation for use as process/comfort heat.
19750	1.47	ABCO 40C 8867	Propane	8 hr/day 5 day/wk 50 wk/yr	04056	Steam generation for use as process/comfort heat.

G. SIGNIFICANT EMISSIONS UNIT INFORMATION

5. Boiler, Small (Heat Input < 5 MMBTU/hr) (continued)

P/O No.	Rating (MMBTU/hr)	Manufacturer/ Model No./ Serial No./	Fuel	Operating Schedule	Location/ Building	Equipment Use
19752	1.3	ABCO 30C 8713	Natural Gas	8 hr/day 5 day/wk 50 wk/yr	20004	Steam generation for use as process/comfort heat.
20313	1.7	Ray Husky WR3-40 B5542	Natural Gas	8 hr/day 5 day/wk 50 wk/yr	00007	Steam generation for use as process/comfort heat.
20384	3.45	Husky WR 3-90 B5309	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	05080	Steam generation for use as process/comfort heat.
20438	4.2	Cleaver Brooks CBH 101-100 L44455	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	01023	Steam generation for use as process/comfort heat.
20439	2.5	Superior NB9053 N/A	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	01028	Steam generation for use as process/comfort heat.
20440	1.7	Ray Husky WR3-40 15499	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	01050	Steam generation for use as process/comfort heat.
20441	2.1	Ray Husky WR3-50 15546	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	01058	Steam generation for use as process/comfort heat.

G. SIGNIFICANT EMISSIONS UNIT INFORMATION

5. Boiler, Small (Heat Input < 5 MMBTU/hr) (continued)

P/O No.	Rating (MMBTU/hr)	Manufacturer/ Model No./ Serial No./	Fuel	Operating Schedule	Location/ Building	Equipment Use
20443	4.2	Cleaver Brooks CB 189-100 L41586	Natural Gas	8 hr/day 5 day/wk 50 wk/yr	20015B	Steam generation for use as process/comfort heat.
20600	4.2	Husky WR3-100 B5495-4052	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	01062	Steam generation for use as process/comfort heat.
20869	4.2	Cleaver Brooks CBH 101-100 L44454	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	01023	Steam generation for use as process/comfort heat.
20870	2.1	Ray Husky WR3-50 15545	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	01058	Steam generation for use as process/comfort heat.
20872	2.5	Ray Husky WR3-60 15244	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	01028	Steam generation for use as process/comfort heat.
20873	4.2	Ray Husky WR3-100 B50765	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	01066	Steam generation for use as process/comfort heat.
21000	3.36	Cleaver Brooks CBX189X-80 L29651	Natural Gas	8 hr/day 5 day/wk 50 wk/yr	20025A	Steam generation for use as process/comfort heat.

G. SIGNIFICANT EMISSIONS UNIT INFORMATION

5. Boiler, Small (Heat Input < 5 MMBTU/hr) (continued)

P/O No.	Rating (MMBTU/hr)	Manufacturer/ Model No./ Serial No./	Fuel	Operating Schedule	Location/ Building	Equipment Use
21080	2.94	Husky WR3-70 B7936	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	01034	Steam generation for use as process/comfort heat.
21081	1.68	Johnston Co. 213-BCP S3262	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	01056	Steam generation for use as process/comfort heat.
21082	2.1	Kewanee FB 194W-A522-X 648490	Natural Gas	8 hr/day 5 day/wk 50 wk/yr	20002	Steam generation for use as process/comfort heat.
21083	2.9	Kewanee M 235 65581	Natural Gas	8 hr/day 5 day/wk 50 wk/yr	20001	Steam generation for use as process/comfort heat.
21084	2.5	Superior 4-5-304 8667	Natural Gas	8 hr/day 5 day/wk 50 wk/yr	20019	Steam generation for use as process/comfort heat.
21141	4.85	ABCO 150AFDG-150 8963	Natural Gas	8 hr/day 5 day/wk 50 wk/yr	20002	Steam generation for use as process/comfort heat.
21142	4.8	ABCO 150AFDG-150 8965	Natural Gas	8 hr/day 5 day/wk 50 wk/yr	20002	Steam generation for use as process/comfort heat.

G. SIGNIFICANT EMISSIONS UNIT INFORMATION

5. Boiler, Small (Heat Input < 5 MMBTU/hr) (continued)

P/O No.	Rating (MMBTU/hr)	Manufacturer/ Model No./ Serial No./	Fuel	Operating Schedule	Location/ Building	Equipment Use
21143	4.3	ABCO 150AFDG-150 8964	Natural Gas	8 hr/day 5 day/wk 50 wk/yr	20004	Steam generation for use as process/comfort heat.
21144	4.3	Superior MS5625 8812	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	5080	Steam generation for use as process/comfort heat.
21145	4.9	Ray Husky WR3-150 B5173-3548	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	01086	Steam generation for use as process/comfort heat.
21146	4.5	Ray Husky WR3-125 B-5308	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	01096	Steam generation for use as process/comfort heat.
21147	4.2	Hurst S625-150-16 N/A	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	Various Locations (portable backup)	Steam generation for use as process/comfort heat.
21203	4.9	Hurst FM-200-D-12 S1000-15-11	Natural Gas	8 hr/day 5 day/wk 50 wk/yr	20004	Steam generation for use as process/comfort heat.

G. SIGNIFICANT EMISSIONS UNIT INFORMATION

6. Boiler, Large (Heat Input ≥ 5 MMBTU/hr)

P/O No.	Rating (MMBTU/hr)	Manufacturer/ Model No./ Serial No./	Fuel	Operating Schedule	Location/ Building	Equipment Use
12369	6.3	York Shipley SPHC59-125-3 60-6191	Propane	8 hr/day 5 day/wk 50 wk/yr	04045	Steam generation for use as process/comfort heat.
12370	5.25	Cleaver Brooks CB100-125 L76910	Propane	8 hr/day 5 day/wk 50 wk/yr	04090	Steam generation for use as process/comfort heat.
14064	5.0	Hurst 5712 S625-15-24	Synthetic Diesel	8 hr/day 5 day/wk 50 wk/yr	38008	Steam generation for use as process support heat.
14611	15.6	Cleaver Brooks D-26-RH WG3378	Synthetic Diesel	8 hr/day 5 day/wk 50 wk/yr	38008	Steam generation for use as process support heat.
19751	5.25	ABCO 125RD 8712	Propane	8 hr/day 5 day/wk 50 wk/yr	36015	Steam generation for use as process/comfort heat.
20442	6.3	Husky/Ray WR3-150 B5173	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	01086	Steam generation for use as process/comfort heat.

G. SIGNIFICANT EMISSIONS UNIT INFORMATION

6. Boiler, Large (Heat Input ≥ 5 MMBTU/hr) (continued)

P/O No.	Rating (MMBTU/hr)	Manufacturer/ Model No./ Serial No./	Fuel	Operating Schedule	Location/ Building	Equipment Use
20601	5.25	Cleaver Brooks CB100-125 L78698	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	Various Locations (portable backup)	This boiler is used on a standby basis as a replacement unit for a boiler which is permanently connected to a fuel source and taken out of service for maintenance purposes or because of a breakdown.
20602	5.28	ABCO 125A 8889	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	Various Locations (portable backup)	This boiler is used on a standby basis as a replacement unit for a boiler which is permanently connected to a fuel source and taken out of service for maintenance purposes or because of a breakdown.
21605	8.4	Husky/Ray WR3-200 B7948	Natural Gas or Propane	8 hr/day 5 day/wk 50 wk/yr	01023	Steam generation for use as process/comfort heat.

G. SIGNIFICANT EMISSIONS UNIT INFORMATION

7. Space Heater

P/O No.	Equipment Description		Building	Operating Schedule
12127	Make: Model: Fuel: Number of Units: Rating:	Lambert/Raznor Various Models Natural Gas 36 at 0.1 MMBTU/hr each 3.6 MMBTU/hr (combined total)	20022	8 hr/day 5 day/wk 50 wk/yr
13660	Make: Model: Fuel: Number of Units: Rating:	Various Makes Various Models Natural Gas 24 at various MMBTU/hr each 3.015 MMBTU/hr (combined total)	20015	8 hr/day 5 day/wk 50 wk/yr

G. SIGNIFICANT EMISSIONS UNIT INFORMATION

8. Rocket Testing - Liquid Fuels

PO No.	Equipment Description	Location/ Building
8534	Rocket Engine Test Stands, E Zone, and associated oxidizer flare stack venting the liquid hydrogen run tanks	Zone E
12164	Rocket Engine Test Stand, E-5	Zone E, Test Stand E-5

G. SIGNIFICANT EMISSIONS UNIT INFORMATION

9. Rocket Testing - Solid Fuels

PO No.	Equipment Description	Location/ Building
66	Horizontal Test Stand, W-4, for static firing of solid rocket motors.	46100
68	Horizontal Test Stand, J-1A, for simulated altitude firing of solid rocket motors.	J-Zone 38000
71	Horizontal Test Stand, T4, for static firing of igniters and solid rocket motors.	46035
18853	Horizontal Test Stand, T3, for static firing of igniters and solid rocket motors.	46035
18859	Horizontal Test Stand, T2, for static firing of igniters and solid rocket motors.	46035
20703	Horizontal Test Stand, P3, for static firing of solid rocket motors.	46030

G. SIGNIFICANT EMISSIONS UNIT INFORMATION

10. Rocket Testing - Liquid and Solid Fuels

PO No.	Equipment Description	Location/ Building
21015 8633 8641 9284	Test Stand, J Zone, for static firing of liquid and solid rocket motors. Oxidizer flare venting system. After testing small scale liquid fuel engines/components, oxidizers containing fluorides and fuels (except the hydrazines) are vented to the flare and oxidized. Fuel flare stack venting the run tank and supply lines from the tank safety valve to the thrust chamber assembly valve. APC scrubbing system venting hydrazines and nitrogen tetroxide emissions from rocket component testing and propellant transfer, consisting of: 1. One (1) fuel scrubber: 10 ft long x 6 in diameter, water spray, gas labyrinth type using water solution as scrubbing liquor. 2. One (1) oxidizer scrubber: 10 ft long x 6 in diameter, water spray, gas labyrinth type using water solution as scrubbing liquor. 3. Associated piping, scrubbing liquor storage tanks.	Zone J Area 38 Bldg 38090
21132 9328	Rocket Engine Test Stands, A Zone, for static firing of liquid and solid rocket motors. APC scrubbing system venting hydrazines and nitrogen tetroxide emissions rocket component testing and propellant transfer, consisting of: 1. One (1) fuel scrubber: 12 ft long x 18 in diameter, water spray, gas labyrinth type using water solution as scrubbing liquor. 2. One (1) oxidizer scrubber: 10 ft long x 6 in diameter, water spray, gas labyrinth type using water solution as scrubbing liquor. 3. Associated piping, scrubbing liquor storage tanks.	Zone A Bldg 30101/ 30102

G. SIGNIFICANT EMISSIONS UNIT INFORMATION

11. Abrasive Blasting Unit

PO No.	Equipment Description	Location/ Building
6385 6386	Abrasive Blasting Unit: Semi-automatic abrasive blaster, Progressive Blasting Systems, Serial #6304, 176 hp Baghouse: Progressive Blasting Systems, Model C, Serial # 6304, 10 hp blower and 600 sq ft of filter cloth area.	20005
8532	Abrasive Blasting Unit: Pauli & Griffin, model PRAM 31, Serial #109, rated at 2 hp. Equipped with a Pauli & Griffin baghouse, model SCWB-2452, with a 2 hp blower.	20004
8732 8733	Abrasive Blasting Unit: Clemco, booth model Flo-Flor (20 ft x 12 ft x 8 ft), blaster model SC 2452, rated at 2.75 hp. Baghouse: Clemco, model 2880, 20.75 hp blower, 2880 sq ft of filter cloth area.	20120
9963	Abrasive Blasting Unit: Pauli & Griffin, model PRAM 31, serial #218, rated at 2 hp. Baghouse: Pauli & Griffin, 2 hp blower, 450 sq ft of filter cloth area (cartridge type).	20004
20917	Abrasive Blasting Unit: Pauli & Griffin, model PRAM 31, Serial #212 Baghouse: Pauli & Griffin, 2 hp blower, 450 sq ft of filter cloth area (cartridge type).	01012

G. SIGNIFICANT EMISSIONS UNIT INFORMATION

12. Dry Material Grinding System

PO No.	Equipment Description	Location/ Building
157	Air Pollution Control System: A. Rotoclone No. 1, American Air Filter, Wet Dynamic Type, Model W, 20 hp B. Exhaust System Venting Microatomizer and 2 DH Micropulverizer Processes	01103
158	Air Pollution Control System: A. Rotoclone No. 2, American Air Filter, Wet Dynamic Type, Model W, 20 hp B. Exhaust System Venting Raymond Mill and 2 DH Micropulverizer Processes	01103
1401	Oxidizer Grinding System: A. Microatomizer process B. 2 DH Micropulverizer process C. Grinder Bypass Process The grinding system is used to grind various types of oxidizers. The system is vented through integral baghouses and Rotoclone No. 1 (PO 157).	01103
1402	Auxiliary Air Pollution Control System for Raymond Mill: A. Cyclone B. Baghouse, 140 sq ft filter cloth area C. Venting inside grind room no. 2	01103
7104	Oxidizer Grinding System: A. Feeder hopper B. Grinding mill C. 100 hp air compressor D. 75 hp air compressor The RDX/HMX grinding system is used to grind various types of oxidizers. The system is operated remotely. The process is vented through collection system (PO No.17904)	01024

G. SIGNIFICANT EMISSIONS UNIT INFORMATION

12. Dry Material Grinding System (continued)

PO No.	Equipment Description	Location/ Building
7608	Oxidizer Grinding System: A. Raymond Mill Process B. 2 DH Micropulverizer Process C. Grinder Bypass Process The grinding system is used to grind various types of oxidizers. The system is vented through integral baghouses and Rotoclone No. 2 (PO 158).	01103
17904	APC System for RDX/HMX Grinding: The collection system consists of four baghouses: A. Primary Baghouse 1: Mikro-Pulsaire, Model: 255-B-30C, 400 cfm and 235 ft^2 cloth area. B. Primary Baghouse 2: Mikro-Pulsaire, Model: 122-DC-3, 400 cfm and 42 ft^2 cloth area C. Secondary Baghouse 1: Unknown manufacturer, 400 cfm and 8.1 ft^2 cloth area D. Secondary Baghouse 2: Aerojet, 400 cfm & 8.5 ft^2 cloth area	01024

G. SIGNIFICANT EMISSIONS UNIT INFORMATION

13. Rocket Motor Dissection Process

PO No.	Equipment Description		Location/ Building
22029	Abrasive Blasting Equipment Make: Clemco Model: 3661 Capacity: 10 ft3 Chamber rotation stand, 1hp Abrasive: Black Beauty, Grade Fine, certified under applicable CARB Executive Order	Compressor: Make: Ingersol Rand Model: P-100-W-W Serial No.: 114701-U80-901 Driven by: 33 hp gasoline IC engine Engine Make: White Engine Inc. Engine Serial No.: G1600X118	46004 W-5
22040	Abrasive Blasting Equipment Make: Clemco Model: SCFW-2452 Capacity: 6 ft3 Chamber rotation stand, 1hp Abrasive: Black Beauty, Grade Fine, certified under applicable CARB Executive Order	Compressor: Make: Ingersol Rand Rating: 75 hp, electric, 110 psig	46011

G. SIGNIFICANT EMISSIONS UNIT INFORMATION

14. Particulate Collection System - Dry

PO No.	Make	Model	Filter Area sq ft	Blower hp	Flow cfm	Serving	Location/ Building
277	Pangborn Corp	223CK-1	1000	7.8	3000	Carpenter shop (wood shavings and sawdust)	20022
22888	Sternvent Co	CCP-100-10-2000	2000	20	5000	Monarch Missile Master Lathe and the American Pacemaker Lathe	20004
7455	American Air Filter (4)	105-1003052-17	N/A	6	2750	Submix/Premix Area	01112
7456	American Air Filter	105-1003052-17	N/A	2	700	Submix/Premix Area	00112
8588	Nilfisk	GS-83	15.4	1.5	208	Production contingencies, short term projects and asbestos cleanups	20004 and various locations
15125	Ross Cook	3HZV6-HE2-XP	564	40	1830	Machining processes	20004
22170	Sternvent Co	CC-3610-720D	720	20	5300	Machine operations in plastics lab	20004
21973	Arrestall	AR-45	264	7.5	2000	Machining processes	05077
22225	Torit	124-7.5	400	15	2900	Machining and Woodworking Processes	20004
22438	Donaldson Torit	DFO-2-4	760	7.5	1300	Rocket motor machining operations in the composite shop.	20004
21653	Ross Cook	2HZV16-HE32	1536	100	5000	NC room machining process	20004

G. SIGNIFICANT EMISSIONS UNIT INFORMATION

14. Particulate Collection System - Dry (continued)

PO No.	Make	Model	Filter Area sq ft	Blower hp	Flow cfm	Serving	Location/ Building
21766	Donaldson Torit	DFO-2-8	1520	10	5000	Turning, milling and drilling processes using a Hermle 5 Axis-milling machine and an Okuma Howe Vertical Turret Lathe	20004

G. SIGNIFICANT EMISSIONS UNIT INFORMATION

15. Particulate Collection System - Wet Scrubber

PO No.	Equipment Description	Serving	Location/ Building
165	Make: Schmieg Model: STM-100 Type: Water Scrubber Size: 4’5” W x 4’5” L x 10’ H, with a 15 hp pump Blower: 3400 CFM	Unit used to remotely machine propellant samples for testing (Slitter/Saw).	05030

G. SIGNIFICANT EMISSIONS UNIT INFORMATION

16. Aerospace Coating Operation (Subject to Aerospace NESHAP GG)

PO No.	Make	Serial No./ Model No.	Dimensions	Exhaust Fan hp	Spray Gun Type	Location/ Building
150	Devilbliss	22050	12'W x 10'H x 7'6"D	5 hp	HVLP	01085
8444	Viking	1212	12'W x 12'H x 8'D	7.5 hp	HVLP	20004
17204	Binks	PF-A-12-10T	12'W x 10'-6"H x 11'-2"D	5 hp	HVLP	01048
17205	Binks	PFA-12-10T	12'W x 10'-6"H x 11'-2"D	5 hp	HVLP	01085
22018	None	None	None	None	Hand application	20004

G. SIGNIFICANT EMISSIONS UNIT INFORMATION

17. Aerospace Cleaning and Surface Preparation Operation (Subject to Aerospace NESHAP GG)

PO No.	Description	Location/ Building
17489	Miscellaneous facility-wide solvent cleaning and surface preparation of aerospace vehicles and components	Facility-Wide

G. SIGNIFICANT EMISSIONS UNIT INFORMATION

18. Aerospace Cleaning and Surface Preparation Operation (Not Subject to Aerospace NESHAP GG)

PO No.	Description	Location/ Building
20419	Solvent cleaning and surface preparation for Space Vehicles	20004

G. SIGNIFICANT EMISSIONS UNIT INFORMATION

19. Aerospace Coating Operation (Not Subject to Aerospace NESHAP GG)

PO No.	Make	Application	Serial No./ Model No.	Dimensions	Exhaust Fan hp	Spray Gun Type	Location/ Building
153	Devilbliss	Space Vehicle Coating	XSW 6520	12'W x 8'H x 4'2"D	15 hp	HVLP	01083
5811	Aerojet Design	Specialty coating	T-114389	12'W x 10'H x 12'D	0.25 hp	HVLP and Air Atomizing Reciprocating Spray Boom (equivalent method that is approved under SMAQMD Rule 456 Section 303.9 by SMAQMD and U.S. EPA)	20004
7497	Binks	Specialty coating - rubber sealant spray booth	N/A	16'W x 12'H x 26'D	(2) 5-hp blowers	HVLP	20004

SIGNIFICANT EMISSIONS UNITS:

19. Aerospace Coating Operation (Not Subject to Aerospace NESHAP GG) (continued):

PO No.	Make	Application	Serial No./ Model No.	Dimensions	Exhaust Fan hp	Spray Gun Type	Location/ Building
8217	Binks	Specialty coating	FF-12-8-T	12'W x 8'H x 7'6"D	7.5 hp	HVLP and Air Atomizing Reciprocating Spray Boom (equivalent method that is approved under SMAQMD Rule 456 Section 303.9 by SMAQMD and U.S. EPA)	01012
20652	Box-Bleeker	Space vehicle coating or specialty coatings as defined in App. A of 40 CFR Part 63		24'W x 8'H x 10'D	7.5 hp	HVLP	01098
21140	Pratt & Whitney	Space vehicle coating or specialty coatings as defined in App. A of 40 CFR Part 63		2'W x 6'H x 32'L	0.75 hp	Air Atomizing Reciprocating Spray Boom (equivalent method that is approved under SMAQMD Rule 456 Section 303.9 by SMAQMD and U.S. EPA)	01083

G. SIGNIFICANT EMISSIONS UNIT INFORMATION

20. Coating Operation - Metal and Wood

PO No.	Make	Application	Serial No./ Model No.	Dimensions	Exhaust Fan (hp)	Spray Gun Type	Location/ Building
7801	Viking	Metal and wood	Model SB-24	14’-0”W x 9’-0”H x 24’L	3 hp	HVLP	20022

G. SIGNIFICANT EMISSIONS UNIT INFORMATION

21. RDX Drying Facility

PO No.	Description	Location/ Building
7779	RDX drying facility No. 1, 8’ x 8’ floor area	01024
7780	Condenser venting RDX drying room No. 1, 3-ton refrigeration unit, (2) blowers, 500 cfm each, 0.33 hp each	01024

G. SIGNIFICANT EMISSIONS UNIT INFORMATION

22. Degreaser, Non-vapor

PO No.	Description	Location/ Building
6968	Degreaser, non-vapor type, Aerojet manufacture, 30” W x 18” D x 48” L, with water cover and two 0.75-hp exhaust fans	01126
7075	Degreaser, non-vapor type, Aerojet manufacture, 30” W x 18” D x 48” L, with water cover and two 0.75-hp exhaust fans	01126

G. SIGNIFICANT EMISSIONS UNIT INFORMATION

23. Bowl Cleaning Station

PO No.	Description	Location/ Building
154	Bowl cleaning station No. 1 with a 16’ W x 13’ L elevated platform for propellant mixing bowls 6’ 3” dia x 7’ h	01036
155	Bowl cleaning station No. 2 with a 16’ W x 13’ L elevated platform for propellant mixing bowls 6’ 3” dia x 7’ h	01036

G. SIGNIFICANT EMISSIONS UNIT INFORMATION

24. Gasoline Storage and Dispensing Facility

P/O No.	Description	Location/ Building
17375	Gasoline storage and dispensing facility	West of Bldg 20022

G. SIGNIFICANT EMISSIONS UNIT INFORMATION

25. Pilot Plant Chemical Manufacturing Process

PO No.	Description	Location/ Building
20492	Pilot plant chemical manufacturing process	01020

G. SIGNIFICANT EMISSIONS UNIT INFORMATION

26. Soluble Mandrel Manufacturing Process

P/O No.	Description	Location/ Building
21734	Soluble mandrel manufacturing process	20004

J. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Facility-wide Requirements - General

SMAQMD Rule 101 – General Provision and Definitions

SIP Approved: 09-03-1998 (64 FR 13514)

Rule Description: This rule provides definitions of terms, specifies authority to arrest and specifies what data is public information.

Compliance Status: The rule does not require the permittee to take any actions.

SMAQMD Rule 102 – Circumvention

SIP Approved: 12-05-1984 (49 FR 47490)

Rule Description: This rule prohibits concealment of emissions and specifies how compliance determinations are made for combined and separated emissions.

Compliance Status: The permittee is expected to comply with the rule requirements.

SMAQMD Rule 105 - Emission Statement

SIP Approved: 06-06-2008 (73 FR 32240)
09-05-1996 rule version is SIP approved

Rule Description: This rule requires the facility to provide annual emission data.

Compliance Status: The permittee has provided annual emission data as required and is in compliance.

SMAQMD Rule 201 - General Permit Requirements

SIP Approved: 07-13-1987 (52 FR 26148)
11-20-1984 rule version is SIP approved
08-24-2006 rule version is the current version and is not SIP approved

Rule Description: This rule provides an orderly procedure for the review of new sources of air pollution and of the modification and operation of existing sources through the issuance of permits.

Compliance Status: The permittee has active permits for all sources that require permits.

J. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Facility-wide Requirements - General (continued)

SMAQMD Rule 202 - New Source Review

SIP approved: SIP approval of 11-20-1984 rule version was withdrawn on 08-19-2011. *10-28-2010 rule version is the current version and is not SIP approved. This rule is not Federally enforceable.*

Rule Description: This rule sets the procedures for review of new and modified stationary sources and provides the mechanisms for evaluating the applicability of BACT and offset requirements.

Compliance Status: The permittee's past permit actions have been in compliance with this rule.

SMAQMD Rule 207 - Title V Federal Operating Permits

SIP Approved: 11-21-2003 (68 FR 65637) (as part of the Title V Federal Operating Permit program approval)
04-26-2001 rule version is SIP approved

Rule Description: This rule sets forth the procedures for review, issuance and renewal of Title V operating permits.

Compliance Status: The permittee has submitted a timely and complete Title V permit renewal application. The expiration date of the current Title V Operating Permit is therefore extended to the time that the SMAQMD makes a decision regarding approving the renewal of the Title V Operating Permit.

SMAQMD Rule 214 - Federal New Source Review

SIP Approved: 07-20-2011 (76 FR 43183)

Rule Description: This rule sets the procedures for review of emissions units at new and modified major stationary sources and provides the mechanisms for evaluating the applicability of BACT and/or offset requirements.

Compliance Status: This is a recently adopted and SIP approved rule. The facility's equipment will be reviewed pursuant to this rule, if applicable, for all future permitting actions.

J. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Facility-wide Requirements - General (continued)

SMAQMD Rule 301 - Permit Fees (for Title V referenced fees only)

SIP approved: The rule is not SIP approved but the portions of the rule that reference Title V permit fees are applicable because they are part of the SMAQMD Title V Federal Operating Permit program approved by U.S. EPA on 11-21-2003 (68 FR 65637).

Rule Description: This rule requires Title V sources to pay specified fees.

Compliance Status: The permittee has paid permit fees as required and is in compliance.

SMAQMD Rule 401 - Ringelmann Chart

SIP Approved: 02-01-1984 (49 FR 3987)
04-19-1983 rule version is SIP approved

Rule Description: This rule limits the discharge of air contaminants into the atmosphere through visible emissions and opacity limitations.

Compliance Status: All of the permittee's equipment is expected to comply with the visible emission requirement.

SMAQMD Rule 403 - Fugitive Dust

SIP Approved: 12-05-1984 (49 FR 47490)
08-03-1977 rule version is SIP approved

Rule Description: The rule regulates equipment and processes that may cause fugitive dust emissions into the atmosphere.

Compliance Status: The facility complies with this rule by taking the necessary precautions to ensure that fugitive dust is not airborne beyond the property line.

SMAQMD Rule 442 - Architectural Coatings

SIP Approved: 11-09-1998 (63 FR 60214)
09-05-1996 rule version is SIP approved
05-24-2001 rule version is the current version and is not SIP approved

Rule Description: This rule limits the quantity of volatile organic compounds in architectural coatings supplied, sold, offered for sale, applied, solicited for application or manufactured for use within the District.

Compliance Status: The affected coatings used by the permittee are received and stored in

J. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Facility-wide Requirements - General (continued)

containers that display the required manufacturer's labels and demonstrate compliance with the rule's requirements.

SMAQMD Rule 466 - Solvent Cleaning

SIP approved: 05-05-2010 (75 FR 24406)
10-28-2010 rule version is SIP approved

Rule Description: This rule reduces the emissions of volatile organic compounds from solvent cleaning operations and activities, and from the storage and disposal of new and spent cleaning solvents.

Compliance Status: The affected architectural coating application equipment solvent cleaning materials used by the facility are received and stored in containers that display the required manufacturer's labels and demonstrate compliance with the rule's requirements.

The following SMAQMD rule is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record:

SMAQMD Rule 701 - Emergency Episode Plan

SIP approved: 09-05-2000 (65 FR 53602):

Rule Description: This rule requires a plan be prepared for specific actions to be taken when health related levels of ozone, carbon monoxide or PM10 are exceeded and is applicable to sources exceeding 50 tons of VOC or NOx or 100 tons of CO or PM.

Compliance Status: This rule is not applicable because the actual emissions from the facility are less than the applicability levels listed in the rule.

The following federal regulation is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record:

40 CFR 64 (begin at 64.1) Compliance Assurance Monitoring

Promulgated: 10-22-1997 (52 FR 54940)

Rule Description: The Compliance Assurance Monitoring (CAM) regulation applies to pollutant-specific emissions units at a major source if the unit satisfies all of the following criteria:

J. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Facility-wide Requirements - General (continued)

1. 40 CFR 64.2(a)(1)

   The unit is subject to an emission limitation or standard for the applicable regulated air pollutant (or surrogate thereof), other than an emission limitation or standard that is exempt under paragraph (b)(1) of this section;

2. 40 CFR 64.2(a)(2)

   The unit uses a control device to achieve compliance with any such emission limitation or standard; and

3. 40 CFR 64.2(a)(3)

   The unit has potential pre-control device emissions of the applicable regulated air pollutant that are equal to or greater than 100 percent of the amount to be classified as a major source. For purposes of this paragraph, "potential pre-control device emissions' shall have the same meaning as "potential to emit," as defined in 40 CFR 64.1, except that emission reductions achieved by the applicable control device shall not be taken into account.

Compliance Status:

1. Other than the rocket motor test stands, none of the emission units operated by the permittee have an uncontrolled potential to emit greater than 100 percent of the amount to be classified as a major source -

ROC	25 tpy
NOx	25 tpy
SO2	100 tpy
PM2.5	100 tpy
PM10	100 tpy
CO	100 tpy

   These emission units are therefore not subject to the CAM requirements.

2. The rocket motor test stands do not use a control device to achieve compliance with an emission limitation or standard. They are therefore not subject to the CAM requirements.

J. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Facility-wide Requirements - General (continued)

40 CFR 68 (begin at 68.1) - Chemical Accident Prevention Provisions

Promulgated: 01-31-1994 (59 FR 4493)
[04-09-2004 most recent amendment]

Rule Description: This regulation specifies requirements for owners or operators of stationary sources concerning the prevention of accidental chemical releases.

An owner or operator of a stationary source that has more than a threshold quantity of a regulated substance in a process, as determined under 40 CFR 68.115, must comply with the requirements of 40 CFR Part 68.

40 CFR 68.215 requires that the air permitting authority include in the Title V permit for a facility specified statements regarding the regulation. Those statements are included in the Federally Enforceable Requirements - General section of the permit.

Compliance Status: The permittee stores more than the designated amounts of the specified chemical substances in 40 CFR 68 and is in compliance with the requirements of the regulation.

40 CFR 82 Subpart F (begin at 82.150) - Protection of Stratospheric Ozone - Recycling and Emissions Reduction

Promulgated: 05-14-1993 (58 FR 28712)
[08-11-2011 most recent amendment]

Rule Description: The purpose of this subpart is to reduce emissions of class I and class II refrigerants and their substitutes to the lowest achievable level by maximizing the recapture and recycling of such refrigerants during the service, maintenance, repair and disposal of appliances and restricting the sale of refrigerants consisting in whole or in part of a class I and class II ODS in accordance with Title VI of the Clean Air Act.

This subpart applies to any person servicing, maintaining or repairing appliances. This subpart also applies to persons disposing of appliances, including small appliances and motor vehicle air conditioners. In addition, this subpart applies to refrigerant reclaimers, technician certifying programs, appliance owners and operators, manufacturers of appliances, manufacturers of recycling and recovery equipment, approved recycling and recovery equipment testing organizations, persons selling class I or class II refrigerants or offering class I or class II refrigerants for sale and persons purchasing class I or class II refrigerants.

J. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Facility-wide Requirements - General (continued)

As indicated in 40 CFR 70.6, Title V permits need to assure compliance with all applicable requirements at the time of permit issuance. Part 70 defines as an applicable requirement, "Any standard or other requirement of the regulations promulgated to protect stratospheric ozone under Title VI of the Act, unless the Administrator has determined that such requirements need not be contained in a Title V permit." [40 CFR 70.2(12)]. The applicable requirements of Title VI are included in the Federally Enforceable Requirements - General section of the permit.

Compliance Status: The permittee employs qualified contractors to maintain equipment that contains class I or class II refrigerants.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 1 - IC Engine, Emergency Use/Generator Set, ≤ 500 hp, Diesel Fuel

SMAQMD Rule 406 - Specific Contaminants

SIP Approved: 12-05-1984 (49 FR 47490)
12-06-1978 rule version is SIP approved

Rule Description: This rule regulates emissions of sulfur compounds and combustion contaminants by limiting emission concentrations of SO2 and particulate matter (PM).

Compliance Status: The following tables illustrate (1) the SMAQMD Rule 406 emission limits for sulfur compounds (measured as SO2) and combustion contaminants (measured as PM) and (2) the expected emissions from the equipment at the facility.

The permittee's equipment complies with this rule.

SO2 Emission Concentration

Equipment	SMAQMD Rule 406 Allowable Sulfur Compounds Emissions ppmv as SO2	Expected Sulfur Compounds Emissions from Subject Equipment ppmv as SO2
IC engine, emergency use	2000	1.03 (A)

(A) Calculated value based on the following:

Diesel Fuel F-Factor	=	9190 dscf/mmBTU
Molar Volume	=	385.3 ft3/mol
Diesel HHV	=	19,300 BTU/lb
SO2 Emission Factor	=	0.005 g/hp-hr (CARB diesel fuel with 15 ppmw S content)
BSFC	=	7000 BTU/hp-hr

The following calculation of SO2 concentration is at 0% excess air which represents worst case.

= (0.005 g/hp-hr) x (1 lb SO2/453.6 g) x (1 hp-hr/7000 BTU) x (1E6 BTU/MMBTU) x (1 MMBTU/9190 dscf) x (1 mol SO2/64 lb SO2) x (385.3 dscf/mol exhaust)
= 0.000001032 mol SO_2/mol exhaust
= 1.03 ppmv

Particulate Matter Emission Concentration

Equipment	SMAQMD Rule 406 Allowable Combustion Contaminants (PM) Emissions grains/dscf at 12% CO2	Expected Combustion Contaminants (PM) Emissions from Subject Equipment grains/dscf at 12% CO2
IC engine, emergency use	0.1	0.028 (A)

(A) Calculated value based on the following:

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 1 - IC Engine, Emergency Use/Generator Set, ≤ 500 hp, Diesel Fuel (continued)

Diesel Fuel F-Factor	=	9190 dscf/mmBTU
Molar Volume	=	385.3 ft3/mol
Diesel HHV	=	19,300 BTU/lb
Conversion Factor	=	15.432 gr/g
PM10 Emission Factor	=	0.15 g/hp-hr
BSFC	=	7000 BTU/hp-hr
Weight % C in Diesel	=	87% or 0.87 lb C/lb fuel

1. Calculate uncorrected grain loading
   = (0.15 g/hp-hr) x (15.432 gr/g) x (1 hp-hr/7000 BTU) x (1E6 BTU/MMBTU) x (1 MMBTU/9190 dscf)
   = 0.036 gr/dscf

2. Calculate CO_2 emission factor (lb CO_2/MMBTU) assuming 100% C to CO_2 conversion
   = (0.87 lb C/lb fuel) x (1 mol C/12 lb C) x (1 mol CO_2/1 mol C) x (44 lb CO_2/mol CO_2) x (1 lb fuel/19300 BTU) x (1E6 BTU/MMBTU)
   = 165.28 lb CO_2/MMBTU

3. Calculate lb CO_2/MMBTU at 99% Conversion of C to CO_2
   = 165.28 lb CO_2/MMBTU x 99%
   = 163.63 lb CO_2/MMBTU

4. Calculate volume % of CO_2 in Exhaust Gas
   = mol CO_2/mol exhaust
   = (163.63 lb CO_2/MMBTU) x (mol CO_2/44 lb CO_2) x (MMBTU/9190 dscf) x (385.3 dscf/mol exhaust)
   = 0.156 mol CO_2/mol exhaust or 15.6% CO_2

5. Calculate corrected grain loading
   = (0.036 gr/dscf) x (12% CO_2/15.6% CO_2)
   = 0.028 gr/dscf corrected to 12% CO_2

SMAQMD Rule 412 - Stationary IC Engines Located at Major Stationary Sources of NOx

SIP Approved: 04-30-1996 (61 FR 18959)
06-01-1995 rule version is SIP approved

Rule Description: This rule regulates NOx, CO and ROC emissions from the operation of stationary IC engines located at major stationary sources of NOx. However, emergency use IC engines are only required to install a non-resetting totalizing hour meter (or computerized tracking) and maintain operation records.

Compliance Status: The permittee's equipment complies with this rule.

(See discussion of streamlining of multiple applicable requirements at the end of this section.)

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 1 - IC Engine, Emergency Use/Generator Set, ≤ 500 hp, Diesel Fuel (continued)

SMAQMD Rule 420 - Sulfur Content of Fuels

SIP Approved: 12-05-1984 (49 FR 47490)
08-13-1981 rule version is SIP approved

Rule Description: This rule regulates emissions of sulfur compounds from the combustion of fuels by limiting the sulfur content of the fuel.

Compliance Status: The following table illustrates the SMAQMD Rule 420 sulfur limits for gaseous and liquid fuels and the expected sulfur content of the gaseous and liquid fuels combusted in equipment at the facility.

The permittee's equipment complies with this rule.

(See discussion of streamlining of multiple applicable requirements at the end of this section.)

Equipment	Fuel	SMAQMD Rule 420 Allowable Sulfur Content of Fuel % S by weight	Expected Sulfur Content of Fuel Used % S by weight
IC engine, emergency use	CARB diesel	0.5	0.0015

Permit Conditions on SMAQMD Rule 201 Permits to Operate

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permit to Operate for the IC engine limits emission concentrations, limits mass emissions, requires emission offsets be provided and requires recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201 permits that are not applicable federally enforceable requirements.

PO No.	Permit conditions that are not federally enforceable
10294 10426 18758 10423 14748	Condition Nos. 1, 2 and 3 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation.

Compliance Status: The permittee's equipment complies with the SMAQMD Rule 201 permit conditions.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 1 - IC Engine, Emergency Use/Generator Set, ≤ 500 hp, Diesel Fuel (continued)

The following federal regulation is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record:

40 CFR 60 Subpart IIII (begin at 60.4200) – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines:

Promulgated: 07-11-2006 (69 FR 33473)

Rule Description: This federal regulation limits the emissions from new Reciprocating Internal Combustion Engines (RICE.)

Compliance Status: The IC engines are not subject to this rule because they commenced construction before the applicability date of April 1, 2006.

40 CFR 63 Subpart ZZZZ (begin at 63.6580) - National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (RICE):

Promulgated: 06-15-2004 (69 FR 33473)

Rule Description: This federal regulation limits the emission of HAP from stationary Reciprocating Internal Combustion Engines (RICE) located at major and area sources of HAP.

Compliance Status: The subpart ZZZZ requirements are applicable to various categories of IC engines. The permittee's IC engines were installed before June 12, 2006 and therefore are "existing" IC engines as defined in Subpart ZZZZ. The IC engines are all categorized as existing IC engines, emergency use, compression ignition, located at a major source of HAP and less than 500 hp.

Subpart ZZZZ requirements -

Category: IC engine, emergency use, existing, compression ignition, ≤ 500 hp, located at a major HAP source
[40 CFR 63.6602 and Table 2c]
[40 CFR 63.6625]

1. This source must be in compliance by May 3, 2013.

2. This source is required to perform the following maintenance:
   a. Change their oil and filter every 500 hours of operation or annually, whichever comes first;
   b. Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first; and

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 1 - IC Engine, Emergency Use/Generator Set, ≤ 500 hp, Diesel Fuel (continued)

c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

3. They have an option of utilizing an oil analysis program in order to extend the specified oil change requirement. The oil analysis must be performed at the same frequency as oil changes are required. The oil analysis program must analyze the parameters and keep records as required in 40 CFR 63.6625(i).

4. During periods of startup, they must minimize the IC engine idle at startup time not to exceed 30 minutes.

5. The IC engine must be operated and maintained according to the manufacturer's instructions or in accordance with a maintenance plan developed by the source which provides for maintenance and operation consistent with good air pollution control practices.

6. Emergency use IC engines must install a non-resettable hour meter

7. This source must keep records of the occurrence and duration of each malfunction of operation (i.e. process equipment) or the air pollution control and monitoring equipment.

8. Records of actions taken during periods of malfunction to minimize emissions must be kept including corrective action taken.

9. They must keep records of maintenance conducted.

10. If the emergency use IC engine doesn't meet the same emission standards as those applicable to non-emergency engines, the source must keep records of the hours spent for emergency operation, what classified the operation as emergency, and how many hours are spent for non-emergency operation.

11. All records must be in a form suitable to and readily available for expeditious review and kept for five years

The Subpart ZZZZ requirements are future effective requirements with a compliance date of May 3, 2013. This will be noted in the Title V Federal Operating Permit conditions.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 1 - IC Engine, Emergency Use/Generator Set, ≤ 500 hp, Diesel Fuel (continued)

Streamlining Multiple Applicable Requirements:

A. Sulfur Content of Fuel

Basis of Requirement	Applicable Requirements % S by weight
SMAQMD Rule No. 420 – Sulfur Content of Fuels	≤ 0.5%
SMAQMD Rule No. 201 permit conditions based on: SMAQMD Rule No. 202 – New Source Review	≤ 0.0015%

Pursuant to U.S. EPA's *White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program*, the above applicable requirements will be streamlined. The most stringent requirements are the permit conditions based on SMAQMD Rule Nos. 201 and 202, which will be included in the Title V permit.

B. Hour Meter

Basis of Requirement	Applicable Requirements
SMAQMD Rule No. 412 – Stationary IC Engines Located at Major Stationary Sources of NOx	Operate a non-resetting totalizing hour meter (or computerized tracking) and maintain operation records.
SMAQMD Rule No. 201 permit conditions based on: SMAQMD Rule No. 202 – New Source Review	Operate a non-resetting totalizing hour meter (or computerized tracking) and maintain operation records.

Pursuant to U.S. EPA's *White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program*, the above applicable requirements will be streamlined. The permit conditions based on SMAQMD Rule Nos. 201 and 202 are as stringent as the SMAQMD Rule 412 requirements and will be included in the Title V permit.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 2 - IC Engine, Emergency Use/Generator Set, > 500 hp, Diesel Fuel

SMAQMD Rule 406 - Specific Contaminants

SIP Approved: 12-05-1984 (49 FR 47490)
12-06-1978 rule version is SIP approved

Rule Description: This rule regulates emissions of sulfur compounds and combustion contaminants by limiting emission concentrations of SO2 and particulate matter (PM).

Compliance Status: See the tables in Section K.1 that illustrate (1) the SMAQMD Rule 406 emission limits for sulfur compounds (measured as SO2) and combustion contaminants (measured as PM) and (2) the expected emissions from the equipment at the facility.

The permittee's equipment complies with this rule.

SMAQMD Rule 412 - Stationary IC Engines Located at Major Stationary Sources of NOx

SIP Approved: 04-30-1996 (61 FR 18959)
06-01-1995 rule version is SIP approved

Rule Description: This rule regulates NOx, CO and ROC emissions from the operation of stationary IC engines located at major stationary sources of NOx. However, emergency use IC engines are only required to install a non-resetting totalizing hour meter (or computerized tracking) and maintain operation records.

Compliance Status: The permittee's equipment complies with this rule.

(See discussion of streamlining of multiple applicable requirements at the end of this section.)

SMAQMD Rule 420 - Sulfur Content of Fuels

SIP Approved: 12-05-1984 (49 FR 47490)
08-13-1981 rule version is SIP approved

Rule Description: This rule regulates emissions of sulfur compounds from the combustion of fuels by limiting the sulfur content of the fuel.

Compliance Status: The following table illustrates the SMAQMD Rule 420 sulfur limits for gaseous and liquid fuels and the expected sulfur content of the gaseous and liquid fuels combusted in equipment at the facility.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 2 - IC Engine, Emergency Use/Generator Set, > 500 hp, Diesel Fuel (continued)

The permittee's equipment complies with this rule.

(See discussion of streamlining of multiple applicable requirements at the end of this section.)

Equipment	Fuel	SMAQMD Rule 420 Allowable Sulfur Content of Fuel % S by weight	Expected Sulfur Content of Fuel Used % S by weight
IC engine, emergency use	CARB diesel	0.5	0.0015

Permit Conditions on SMAQMD Rule 201 Permits to Operate

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permit to Operate for the IC engine limits emission concentrations, limits mass emissions, requires emission offsets be provided and requires recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201 permits that are not applicable federally enforceable requirements.

PO No.	Permit conditions that are not federally enforceable
10422 21136 21619	Condition Nos. 1, 2 and 3 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation.

Compliance Status: The permittee's equipment complies with the SMAQMD Rule 201 permit conditions.

The following federal regulation is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record:

40 CFR 60 Subpart IIII (begin at 60.4200) – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines:

Promulgated: 07-11-2006 (69 FR 33473)

Rule Description: This federal regulation limits the emissions from new Reciprocating

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 2 - IC Engine, Emergency Use/Generator Set, > 500 hp, Diesel Fuel (continued)

Internal Combustion Engines (RICE.)

Compliance Status: The IC engines are not subject to this rule because they commenced construction before the applicability date of April 1, 2006.

The following federal regulation is not applicable to this equipment but it is discussed here to document the non-applicability determination for the record:

40 CFR 63 Subpart ZZZZ (begin at 63.6580) - National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (RICE):

Promulgated: 06-15-2004 (69 FR 33473)

Rule Description: This federal regulation limits the emission of HAP from stationary Reciprocating Internal Combustion Engines (RICE) located at major and area sources of HAP.

Compliance Status:

1. PO 21619
   The IC engine under PO No. 21619 is portable (i.e. mobile not stationary) and is therefore not subject to Subpart ZZZZ by the definition of a stationary RICE in 40 CFR 63.6675 -

   Stationary reciprocating internal combustion engine (RICE) means any reciprocating internal combustion engine which uses reciprocating motion to convert heat energy into mechanical work and which is not mobile. Stationary RICE differ from mobile RICE in that a stationary RICE is not a non-road engine as defined at 40 CFR 1068.30, and is not used to propel a motor vehicle or a vehicle used solely for competition.

2. PO 10422 and 21136
   The subpart ZZZZ requirements are applicable to various categories of IC engines. These IC engines were installed before December 19, 2002 and therefore are "existing" IC engines as defined in Subpart ZZZZ. They are all categorized as existing IC engines, emergency use, compression ignition, located at a major source of HAP and greater than 500 hp.

   Subpart ZZZZ requirements -

   Category: IC engine, emergency use, existing, compression ignition, > 500 hp, located at a major HAP source: [40 CFR 63.6600(c)]

   1. The IC engines in this category do not have to comply with any

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 2 - IC Engine, Emergency Use/Generator Set, > 500 hp, Diesel Fuel (continued)

requirements of Subpart ZZZZ.

Streamlining Multiple Applicable Requirements:

A. Sulfur Content of Fuel

Basis of Requirement	Applicable Requirements % S by weight
SMAQMD Rule No. 420 – Sulfur Content of Fuels	≤ 0.5%
SMAQMD Rule No. 201 permit conditions based on: SMAQMD Rule No. 202 – New Source Review	≤ 0.0015%

Pursuant to U.S. EPA's *White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program*, the above applicable requirements will be streamlined. The most stringent requirements are the permit conditions based on SMAQMD Rule Nos. 201 and 202, which will be included in the Title V permit.

B. Hour Meter

Basis of Requirement	Applicable Requirements
SMAQMD Rule No. 412 – Stationary IC Engines Located at Major Stationary Sources of NOx	Operate a non-resetting totalizing hour meter (or computerized tracking) and maintain operation records.
SMAQMD Rule No. 201 permit conditions based on: SMAQMD Rule No. 202 – New Source Review	Operate a non-resetting totalizing hour meter (or computerized tracking) and maintain operation records.

Pursuant to U.S. EPA's *White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program*, the above applicable requirements will be streamlined. The permit conditions based on SMAQMD Rule Nos. 201 and 202 are as stringent as the SMAQMD Rule 412 requirements and will be included in the Title V permit.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 3 - IC Engine, Emergency Use/Fire Pump, Diesel Fuel

SMAQMD Rule 406 - Specific Contaminants

SIP Approved: 12-05-1984 (49 FR 47490)
12-06-1978 rule version is SIP approved

Rule Description: This rule regulates emissions of sulfur compounds and combustion contaminants by limiting emission concentrations of SO2 and particulate matter (PM).

Compliance Status: See the tables in Section K.1 that illustrate (1) the SMAQMD Rule 406 emission limits for sulfur compounds (measured as SO2) and combustion contaminants (measured as PM) and (2) the expected emissions from the equipment at the facility.

The permittee's equipment complies with this rule.

SMAQMD Rule 412 - Stationary IC Engines Located at Major Stationary Sources of NOx

SIP Approved: 04-30-1996 (61 FR 18959)
06-01-1995 rule version is SIP approved

Rule Description: This rule regulates NOx, CO and ROC emissions from the operation of stationary IC engines located at major stationary sources of NOx. However, emergency use IC engines are only required to install a non-resetting totalizing hour meter (or computerized tracking) and maintain operation records.

Compliance Status: The permittee's equipment complies with this rule.

(See discussion of streamlining of multiple applicable requirements at the end of this section.)

SMAQMD Rule 420 - Sulfur Content of Fuels

SIP Approved: 12-05-1984 (49 FR 47490)
08-13-1981 rule version is SIP approved

Rule Description: This rule regulates emissions of sulfur compounds from the combustion of fuels by limiting the sulfur content of the fuel.

Compliance Status: The following table illustrates the SMAQMD Rule 420 sulfur limits for gaseous and liquid fuels and the expected sulfur content of the gaseous and liquid fuels combusted in equipment at the facility.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 3 - IC Engine, Emergency Use/Fire Pump, Diesel Fuel (continued)

The permittee's equipment complies with this rule.

(See discussion of streamlining of multiple applicable requirements at the end of this section.)

Equipment	Fuel	SMAQMD Rule 420 Allowable Sulfur Content of Fuel % S by weight	Expected Sulfur Content of Fuel Used % S by weight
IC engine, emergency use	CARB diesel	0.5	0.0015

Permit Conditions on SMAQMD Rule 201 Permits to Operate:

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permit to Operate for the IC engine limits emission concentrations, limits mass emissions, requires emission offsets be provided and requires recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201 permits that are not applicable federally enforceable requirements.

PO No.			Permit conditions that are not federally enforceable
10408 10434 10435 10436 10437	10438 10439 10440 10441 10442	10443 10444 10445 10446	Condition Nos. 1, 2 and 3 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation.

Compliance Status: The permittee's equipment complies with the SMAQMD Rule 201 permit conditions.

The following federal regulation is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record:

40 CFR 60 Subpart IIII (begin at 60.4200) – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines:

Promulgated: 07-11-2006 (69 FR 33473)

Rule Description: This federal regulation limits the emissions from new Reciprocating Internal Combustion Engines (RICE.)

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 3 - IC Engine, Emergency Use/Fire Pump, Diesel Fuel (continued)

Compliance Status: The IC engines are not subject to this rule because they commenced construction before the applicability date of April 1, 2006.

40 CFR 63 Subpart ZZZZ (begin at 63.6580) - National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (RICE):

Promulgated: 06-15-2004 (69 FR 33473)

Rule Description: This federal regulation limits the emission of HAP from stationary Reciprocating Internal Combustion Engines (RICE) located at major and area sources of HAP.

Compliance Status: The subpart ZZZZ requirements are applicable to various categories of IC engines. The subject IC engines were installed before June 12, 2006 and therefore are "existing" IC engines as defined in Subpart ZZZZ. The IC engines are all categorized as existing IC engines, emergency use, compression ignition, located at a major source of HAP and less than 500 hp.

Subpart ZZZZ requirements -

Category: IC engine, emergency use, existing, compression ignition, ≤ 500 hp, located at a major HAP source
[40 CFR 63.6602 and Table 2c]
[40 CFR 63.6625]

1. This source must be in compliance by May 3, 2013.

2. This source is required to perform the following maintenance:
   a. Change their oil and filter every 500 hours of operation or annually, whichever comes first;
   b. Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first; and
   c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
3. They have an option of utilizing an oil analysis program in order to extend the specified oil change requirement. The oil analysis must be performed at the same frequency as oil changes are required. The oil analysis program must analyze the parameters and keep records as required in 40 CFR 63.6625(i).

4. During periods of startup, they must minimize the IC engine idle at startup time not to exceed 30 minutes.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 3 - IC Engine, Emergency Use/Fire Pump, Diesel Fuel (continued)

5. The IC engine must be operated and maintained according to the manufacturer's instructions or in accordance with a maintenance plan developed by the source which provides for maintenance and operation consistent with good air pollution control practices.

6. Emergency use IC engines must install a non-resettable hour meter.

7. This source must keep records of the occurrence and duration of each malfunction of operation (i.e. process equipment) or air pollution control and monitoring equipment).

8. Records of actions taken during periods of malfunction to minimize emissions must be kept including corrective action taken.

9. They must keep records of maintenance conducted.

10. If the emergency use IC engine doesn't meet the same emission standards as those applicable to non-emergency engines, the source must keep records of the hours spent for emergency operation, what classified the operation as emergency, and how many hours are spent for non-emergency operation.

11. All records must be in a form suitable to and readily available for expeditious review and kept for five years

The Subpart ZZZZ requirements are future effective requirements with a compliance date of May 3, 2013. This will be noted in the Title V Federal Operating Permit conditions.

<u>Streamlining Multiple Applicable Requirements:</u>

A. <u>Sulfur Content of Fuel</u>

Basis of Requirement	Applicable Requirements % S by weight
SMAQMD Rule No. 420 – Sulfur Content of Fuels	≤ 0.5%
SMAQMD Rule No. 201 permit conditions based on: SMAQMD Rule No. 202 – New Source Review	≤ 0.0015%

Pursuant to U.S. EPA's *White Paper Number 2 for Improved Implementation of the Part 70*

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 3 - IC Engine, Emergency Use/Fire Pump, Diesel Fuel (continued)

Operating Permits Program, the above applicable requirements will be streamlined. The most stringent requirements are the permit conditions based on SMAQMD Rule Nos. 201 and 202, which will be included in the Title V permit.

B. Hour Meter

Basis of Requirement	Applicable Requirements
SMAQMD Rule No. 412 – Stationary IC Engines Located at Major Stationary Sources of NOx	Operate a non-resetting totalizing hour meter (or computerized tracking) and maintain operation records.
SMAQMD Rule No. 201 permit conditions based on: SMAQMD Rule No. 202 – New Source Review	Operate a non-resetting totalizing hour meter (or computerized tracking) and maintain operation records.

Pursuant to U.S. EPA's *White Paper Number 2 for Improved Implementation of the Part 70 Operating Permits Program*, the above applicable requirements will be streamlined. The permit conditions based on SMAQMD Rule Nos. 201 and 202 are as stringent as the SMAQMD Rule 412 requirements and will be included in the Title V permit.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 4 - IC Engine, Emergency Use/Generator Set, Propane

SMAQMD Rule 406 - Specific Contaminants

SIP Approved: 12-05-1984 (49 FR 47490)
12-06-1978 rule version is SIP approved

Rule Description: This rule regulates emissions of sulfur compounds and combustion contaminants by limiting emission concentrations of SO2 and particulate matter (PM).

Compliance Status: The permittee's equipment complies with this rule. The fuel has a sulfur content of less than 254 ppmvd thus SO2 emissions are expected to be well below the 2000 ppmv limit set by this rule. This IC engine is fueled with propane thus PM concentration is expected to be well below the 0.1 grains/dscf at 12% CO2 limit of this rule.

The following SMAQMD rule is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record:

SMAQMD Rule 412 - Stationary IC Engines Located at Major Stationary Sources of NOx

SIP Approved: 04-30-1996 (61 FR 18959)
06-01-1995 rule version is SIP approved

Rule Description: This rule regulates ROC, NOx and CO emissions from the operation of stationary IC engines located at major stationary sources of NOx.

Compliance Status: This engine is portable, thus not subject to this rule.

SMAQMD Rule 420 - Sulfur Content of Fuels

SIP Approved: 12-05-1984 (49 FR 47490)
08-13-1981 rule version is SIP approved

Rule Description: This rule regulates emissions of sulfur compounds from the combustion of fuels by limiting the sulfur content of the fuel.

Compliance Status: The following table illustrates the SMAQMD Rule 420 sulfur limits for gaseous and liquid fuels and the expected sulfur content of the gaseous and liquid fuels combusted in equipment at the facility.

The permittee's equipment complies with this rule.

(See discussion of streamlining of multiple applicable requirements at the end of this section.)

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 4 - IC Engine, Emergency Use/Generator Set, Propane (continued)

Equipment	Fuel	SMAQMD Rule 420 Maximum Allowable Sulfur Content of Fuel g/m3	Expected Sulfur Content of Fuel Used (A) g/m3
IC engine, emergency use	Propane	1.14	0.33

(A) Commercial propane has a maximum sulfur concentration of 239 ppmv as H2S, therefore the maximum sulfur concentration as H2S is:
= [(239 ppmv)(12.187 mol/ppmv/m3/^{o}C)(34.08 g/mol)/(273.15 + 25 ^{o}C)] /1000
= 0.33 grams/m3

Permit Conditions on SMAQMD Rule 201 Permit to Operate:

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permit to Operate for the IC engine limit emission concentrations, limit mass emissions and require recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201 permits that are not applicable federally enforceable requirements.

PO No.	Permit conditions that are not federally enforceable
10424	Condition Nos. 1, 2 and 3 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation.

Compliance Status: The permittee's equipment complies with the SMAQMD Rule 201 permit conditions.

The following federal regulation is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record:

40 CFR 60 Subpart JJJJ (begin at 60.4230) – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines:

Promulgated: 01-18-2008 (73 FR 3591)

Rule Description: This federal regulation limits the emissions from new Reciprocating Internal Combustion Engines (RICE.)

Compliance Status: The IC engine is not subject to this rule because it commenced construction before the applicability date of January 1, 2009.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 4 - IC Engine, Emergency Use/Generator Set, Propane (continued)

40 CFR 63 Subpart ZZZZ (begin at 63.6580) - National Emission Standards for Hazardous Air Pollutants for Reciprocating Internal Combustion Engines (RICE):

Promulgated: 06-15-2004 (69 FR 33473)

Rule Description: This federal regulation limits the emission of HAP from stationary Reciprocating Internal Combustion Engines (RICE) located at major and area sources of HAP.

Compliance Status: The subpart ZZZZ requirements are applicable to various categories of IC engines. The IC engine was installed before June 12, 2006 and therefore is an "existing" IC engine as defined in Subpart ZZZZ. The IC engine is categorized as an existing IC engine, emergency use, spark ignited, located at a major source of HAP and less than 500 hp.

Subpart ZZZZ requirements -

Category: IC engine, emergency use, existing, spark ignited, ≤ 500 hp, located at a major HAP source
[40 CFR 63.6602 and Table 2c]
[40 CFR 63.6625]

1. This source must be in compliance by October 19, 2013.

2. This source is required to perform the following maintenance:
   a. Change their oil and filter every 500 hours of operation or annually, whichever comes first;
   b. Inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first; and
   c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

3. They have an option of utilizing an oil analysis program in order to extend the specified oil change requirement. The oil analysis must be performed at the same frequency as oil changes are required. The oil analysis program must analyze the parameters and keep records as required in 40 CFR 63.6625(i).

4. During periods of startup, they must minimize the IC engine idle at startup time not to exceed 30 minutes.

5. The IC engine must be operated and maintained according to the manufacturer's instructions or in accordance with a maintenance plan developed by the source which provides for maintenance and operation consistent with good air pollution control practices.

6. Emergency use IC engines must install a non-resettable hour meter.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 4 - IC Engine, Emergency Use/Generator Set, Propane (continued)

7. This source must keep records of the occurrence and duration of each malfunction of operation (i.e. process equipment) or air pollution control and monitoring equipment.

8. Records of actions taken during periods of malfunction to minimize emissions must be kept including corrective action taken.

9. They must keep records of maintenance conducted.

10. If the emergency use IC engine doesn't meet the same emission standards as those applicable to non-emergency engines, the source must keep records of the hours spent for emergency operation, what classified the operation as emergency, and how many hours are spent for non-emergency operation.

11. All records must be in a form suitable to and readily available for expeditious review and kept for five years

The Subpart ZZZZ requirements are future effective requirements with a compliance date of October 19, 2013. This will be noted in the Title V Federal Operating Permit conditions.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 5 - Boiler, Small (Heat Input < 5 MMBTU/hour)

SMAQMD Rule 406 - Specific Contaminants

SIP Approved: 12-05-1984 (49 FR 47490)
12-06-1978 rule version is SIP approved

Rule Description: This rule regulates emissions of sulfur compounds and combustion contaminants by limiting emission concentrations of SO2 and particulate matter (PM). The rule's emission limits are 0.2% SO2 by volume and 0.1 grains PM/ft3 at 12% CO2.

Compliance Status: In compliance. The boilers are fired on gaseous fuels only and are expected to emit less than 0.001% SO2 by volume and less than 0.02 grains PM/ft3 at 12% CO2.

SMAQMD Rule 411 – NOx from Boilers, Process Heaters and Steam Generators

SIP Approved: 08-01-2007 (72 FR 41894)
[10-27-2005 amended version]

Rule Description: This rule limits NOx and CO emissions from boilers, steam generator and process heaters with heat input ratings of 1 MMBTU/hour or greater. It limits the emission concentration of NOx to 30 ppm at 3% O2 and the emission of CO to 400 ppm at 3% O2 for boilers < 5 MMBTU/hr. Existing boilers can take a fuel restriction in lieu of complying with the emissions limitation.

Compliance Status: The permittee complies with the rule requirements by either meeting the emission standards or by limiting fuel usage, depending on the boiler.

SMAQMD Rule 420 - Sulfur Content of Fuels

SIP Approved: 12-05-1984 (49 FR 47490)
08-13-1981 rule version is SIP approved

Rule Description: This rule regulates emissions of sulfur compounds from the combustion of fuels by limiting the sulfur content of the fuel.

Compliance Status: The following table illustrates the SMAQMD Rule 420 sulfur limits for gaseous and liquid fuels and the expected sulfur content of the gaseous and liquid fuels combusted in equipment at the facility.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 5 - Boiler, Small (Heat Input < 5 MMBTU/hour) (continued)

Equipment	Fuel	SMAQMD Rule 420 Allowable Sulfur Content of Fuel	Expected Sulfur Content of Fuel Used(A)
Boilers	Propane	1.14 g/m3	0.33 g/m3
Boilers	Natural Gas	50 grains H2S/100ft3	<0.5 grains H2S/100ft3

(A) Commercial propane has a maximum sulfur concentration of 239 ppmv as H2S, thus the maximum concentration in grams/m3 as H2S is:
g/m3 = [(239 ppmv)(12.187)(34.08 g/mol)/(273.15+25 ^{o}C)]/1000 = 0.33

40 CFR 63 Subpart DDDDD (begin at 63.7480) - NESHAP for Industrial, Commercial and Institutional Boilers - Major Sources:

Rule Description: This rule limits the amount of HAPs that may be released from all new (built after 06-04-2010) and existing industrial, commercial and institutional boilers and process heaters that are located at facilities considered to be major sources of HAP.

Rule Status: The rule was originally promulgated 09-13-2004 but immediately faced legal challenges that delayed the rule. The following is the most recent action on the rule.

02-21-2011 U.S. EPA finalized the revised rule.

05-18-2011 U.S. EPA published a notice delaying the effective date of the boiler major source rule (The Boiler MACT) until the completion of the recently announced reconsideration or the completion of litigation on the rule, whichever is earlier.

12-23-2011 U.S. EPA published the Boiler MACT reconsideration proposal (40 CFR 63, subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters).

01-09-2012 The U.S. District Court for the DC Circuit vacated the U.S. EPA's May 18, 2011 notice that delayed the effective dates of the Boiler MACT rule.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 5 - Boiler, Small (Heat Input < 5 MMBTU/hour) (continued)

02-07-2012 U.S. EPA issued a No Action Assurance Letter to establish that they will exercise their enforcement discretion to not pursue enforcement action for violations of certain notification deadlines in the final Major Source Boiler rule. U.S. EPA intends to issue the final reconsideration rule prior to any of the compliance dates for existing sources.

The permittee only has existing boilers at their facility. This makes the compliance date 3 years after the most recent promulgated rule which would be 02-21-2014.

At this time it is not known whether the reconsideration proposal, published 12-23-2011, will change the compliance dates.

Compliance Status: The final requirements of the NESHAP reconsideration proposal are unknown. No requirements related to the NESHAP will be placed in the Title V permit at this time.

When the NESHAP reconsideration proposal becomes final the Title V permit will be reopened and the necessary requirements will be added.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 5 - Boiler, Small (Heat Input < 5 MMBTU/hour) (continued)

Permit Conditions on SMAQMD Rule 201 Permits to Operate:

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permits to Operate limit emission concentrations, limit mass emissions, and require recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201 permits that are not applicable federally enforceable requirements.

PO No.	Permit conditions that are not federally enforceable
12918 14603 19729 19731 19732 19738 19739 19740 19741 19742 19743 19747 19748 19749 19750 19752 20313 20384 20438 20439 20440 20441 20443 20600 20869 20870 20872 20873 21000 21080 21081 21082 21083 21084 21141 21142 21143 21144 21147 21203	Conditions No. 1, 2 and 3 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.
19733 19735 19737 21145 21146	Conditions No. 1, 2 and 3 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable. These boilers were originally permitted to allow natural gas or propane as primary fuels (PO Nos. 10322, 10306, 10333, 10318 and 10302). This condition was accidentally removed when the permits were revised to comply with Rule 411 by installing Low-NOx burners. A condition allowing the use of propane will be added back to these permits.

Compliance Status: The permittee's equipment complies with the SMAQMD Rule 201 permit conditions.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 6 - Boiler, Large (Heat Input ≥ 5 MMBTU/hr)

SMAQMD Rule 401 - Ringelmann Chart

SIP Approved: 02-01-1984 (49 FR 3987)
04-19-1983 rule version is SIP approved

Rule Description: This rule limits the discharge of air contaminants into the atmosphere through visible emissions and opacity limitations.

Compliance Status: All boilers are in compliance with the visible emission requirement.

SMAQMD Rule 406 - Specific Contaminants

SIP Approved: 12-05-1984 (49 FR 47490)
12-06-1978 rule version is SIP approved

Rule Description: This rule regulates emissions of sulfur compounds and combustion contaminants by limiting emission concentrations of SO2 and particulate matter (PM). The rule's emission limits are 0.2% SO2 by volume and 0.1 grains PM/ft3 at 12% CO2.

Compliance Status: In compliance. The boilers are fired on gaseous fuels only and are expected to emit less than 0.001% SO2 by volume and less than 0.02 grains PM/ft3 at 12% CO2.

SMAQMD Rule 411 – NOx from Boilers, Process Heaters and Steam Generators

SIP Approved: 08-01-2007 (72 FR 41894)
[10-27-2005 amended version]

Rule Description: This rule limits NOx and CO emissions from boilers, steam generator and process heaters with heat input ratings of 1 MMBTU/hour or greater. It limits the emission concentration as described in the table below.

Boiler Size (MMBTU/hr)	NOx ppmv at 3% O2	CO ppmv at 3% O2	or limit fuel usage therms/year
≥ 5 and < 20	15	400	200,000
≥ 20 and < 100	9	400	200,000
≥ 100	9	400	300,000

Compliance Status: The permittee complies with the rule requirements by either meeting the emission standards or by limiting fuel usage, depending on the boiler.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 6 - Boiler, Large (Heat Input ≥ 5 MMBTU/hr) (continued)

SMAQMD Rule 420 - Sulfur Content of Fuels

SIP Approved: 12-05-1984 (49 FR 47490)
08-13-1981 rule version is SIP approved

Rule Description: This rule regulates emissions of sulfur compounds from the combustion of fuels by limiting the sulfur content of the fuel.

Compliance Status: The following table illustrates the SMAQMD Rule 420 sulfur limits for gaseous and liquid fuels and the expected sulfur content of the gaseous and liquid fuels combusted in equipment at the facility.

Equipment	Fuel	SMAQMD Rule 420 Allowable Sulfur Content of Fuel	Expected Sulfur Content of Fuel Used(A)
Boiler	Propane	1.14 g/m3	0.33 g/m3
Boiler	Natural Gas	50 grains H2S/100ft3	<0.5 grains H2S/100ft3

(A) Commercial propane has a maximum sulfur concentration of 239 ppmv as H2S, thus the maximum concentration in grams/m3 as H2S is:
g/m3 = [(239 ppmv)(12.187)(34.08 g/mol)/(273.15+25 ^{o}C)]/1000 = 0.33

40 CFR 63 Subpart DDDDD (begin at 63.7480) - NESHAP for Industrial, Commercial and Institutional Boilers:

Rule Description: This rule limits the amount of HAPs that may be released from all new (built after 06-04-2010) and existing industrial, commercial and institutional boilers and process heaters that are located at facilities considered to be major sources of HAP.

Rule Status: The rule was originally promulgated 09-13-2004 but immediately faced legal challenges that delayed the rule. The following is the most recent action on the rule.

02-21-2011 U.S. EPA finalized the revised rule.

05-18-2011 U.S. EPA published a notice delaying the effective date of the boiler major source rule (The Boiler MACT) until the completion of the recently announced reconsideration or the completion of litigation on the rule, whichever is earlier.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 6 - Boiler, Large (Heat Input ≥ 5 MMBTU/hr) (continued)

12-23-2011 U.S. EPA published the Boiler MACT reconsideration proposal (40 CFR 63, subpart DDDDD, National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters).

01-09-2012 The U.S. District Court for the DC Circuit vacated the U.S. EPA's May 18, 2011 notice that delayed the effective dates of the Boiler MACT rule.

02-07-2012 U.S. EPA issued a No Action Assurance Letter to establish that they will exercise their enforcement discretion to not pursue enforcement action for violations of certain notification deadlines in the final Major Source Boiler rule. U.S. EPA intends to issue the final reconsideration rule prior to any of the compliance dates for existing sources.

The permittee only has existing boilers making the compliance date 3 years after the most recent promulgated rule which will be 02-21-2014.

At this time it is not known whether the reconsideration proposal, published 12-23-2011, will change the compliance dates.

Compliance Status: The final requirements of the NESHAP reconsideration proposal are unknown. No requirements related to the NESHAP will be placed in the Title V permit at this time.

When the NESHAP reconsideration proposal becomes final the Title V permit will be reopened and the necessary requirements will be added.

Permit Conditions on SMAQMD Rule 201 Permits to Operate:

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permits to Operate limit emission concentrations, limit mass emissions and require recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201 permits that are not applicable federally enforceable requirements.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 6 - Boiler, Large (Heat Input ≥ 5 MMBTU/hr) (continued)

PO No.	Permit conditions that are not federally enforceable
21605 12369 12370	Conditions No. 1, and 2 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.
14064 14611 19744 19745 19751 20601 20602	Conditions No. 1, 2 and 3 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.
20442 21605	Conditions No. 1, 2 and 3 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable. These boilers were originally permitted to allow natural gas or propane fuels (POs No. 10311 and 10325). This condition was accidentally removed when the permits were revised to comply with Rule 411 by installing Low-NOx burners. A condition allowing the use of propane as backup fuel will be added back to these permits.

Compliance Status: The permittee's equipment complies with the SMAQMD Rule 201 permit conditions.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 7 - Space Heaters

SMAQMD Rule 401 - Ringelmann Chart

SIP Approved: 02-01-1984 (49 FR 3987)
04-19-1983 rule version is SIP approved

Rule Description: This rule limits the discharge of air contaminants into the atmosphere through visible emissions and opacity limitations.

Compliance Status: The space heaters are in compliance with the visible emission requirement.

SMAQMD Rule 406 - Specific Contaminants

SIP Approved: 12-05-1984 (49 FR 47490)
12-06-1978 rule version is SIP approved

Rule Description: This rule regulates emissions of sulfur compounds and combustion contaminants by limiting emission concentrations of SO2 and particulate matter (PM). The rule's emission limits are 0.2% SO2 by volume and 0.1 grains PM/ft3 at 12% CO2.

Compliance Status: In compliance. The space heaters are fired on natural gas and are expected to emit less than 0.001% SO2 by volume and less than 0.02 grains PM/ft3 at 12% CO2.

SMAQMD Rule 420 - Sulfur Content of Fuels

SIP Approved: 12-05-1984 (49 FR 47490)
08-13-1981 rule version is SIP approved

Rule Description: This rule regulates emissions of sulfur compounds from the combustion of fuels by limiting the sulfur content of the fuel.

Compliance Status: The following table illustrates the SMAQMD Rule 420 sulfur limits for gaseous and liquid fuels and the expected sulfur content of the gaseous and liquid fuels combusted in equipment at the facility.

Fuel	SMAQMD Rule 420 Allowable Sulfur Content of Fuel	Expected Sulfur Content of Fuel Used
Natural Gas	50 grains H2S/100ft3	<0.5 H2S/100ft3

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 7 - Space Heaters (continued)

Permit Conditions on SMAQMD Rule 201 Permits to Operate:

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permits to Operate limit emission concentrations, limit mass emissions, and require recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201 permit that are not applicable federally enforceable requirements.

PO No.	Permit conditions that are not federally enforceable
12127 13660	Conditions No. 1, 2 and 3 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.

Compliance Status: The permittee's equipment complies with the SMAQMD Rule 201 permit conditions.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 8 - Rocket Motor Testing - Liquid Fuels

SMAQMD Rule 203 – Prevention of Significant Deterioration (40 CFR §52.21)

Rule Description: This rule requires compliance with the provisions of 40 CFR 52.21.

Compliance Status: The affected source, Test Stand E-5, has demonstrated compliance with the requirements of this regulation.

SMAQMD Rule 401 - Ringelmann Chart

SIP Approved: 02-01-1984 (49 FR 3987)
04-19-1983 rule version is SIP approved

Rule Description: This rule limits the discharge of air contaminants into the atmosphere through visible emissions and opacity limitations.

Compliance Status: The rocket motor tests are never more than 3 minutes in duration and they are never less than 1 hour apart. Therefore, the permittee complies with this regulation.

Visible emissions from the associated oxidizer flares are less than 20% opacity

The following SMAQMD rule is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record:

SMAQMD Rule 406 - Specific Contaminants

SIP Approved: 12-05-1984 (49 FR 47490)
12-06-1978 rule version is SIP approved

Rule Description: This rule regulates emissions of sulfur compounds and combustion contaminants by limiting emission concentrations of SO2 and particulate matter (PM). The rule's emission limits are 0.2% SO2 by volume and 0.1 grains PM/ft3 at 12% CO2.

Compliance Status: This requirement was not intended for unconfined emissions. Particulate emissions from the rocket motor testing are created right before the gases exit the rocket thus there is no stack for sampling. The high temperature and flow also make it impossible to verify compliance with this rule. Therefore, rocket motor testing shall be treated as a fugitive source and as such, not subject to this rule.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 8 - Rocket Motor Testing - Liquid Fuels (continued)

SMAQMD Rule 420 - Sulfur Content of Fuels

SIP Approved: 12-05-1984 (49 FR 47490)
08-*13-1981 rule version is SIP approved*

Rule Description: This rule regulates emissions of sulfur compounds from combustion of fuels.

Compliance Status: Rocket motor fuels meet the requirements of this rule.

The following federal regulation is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record:

40 CFR 63 Subpart PPPPP National Emission Standards for Hazardous Air Pollutants: Engine Test Cells/Stands (begin at 63.9280)

Promulgated: 05-27-2003 (68 FR 28774)

Rule Description: This NESHAP establishes national emission standards for hazardous air pollutants for engine test cells/stands located at major sources of hazardous air pollutants (HAP) emissions.

Compliance Status: 40 CFR 63.9290(d)(2) exempts "any portion of the affected source used exclusively for testing rocket engines" from all requirements of the NESHAP

Permit Conditions on SMAQMD Rule 201 Permits to Operate

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permits to Operate limit emission concentrations, limit mass emissions, and require recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201 permit that are not applicable federally enforceable requirements.

PO No.	Permit conditions that are not federally enforceable
8534 12164	Condition Nos. 1 and 2 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.

Compliance Status: The permittee's equipment complies with the SMAQMD Rule 201 permit conditions.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 9 - Rocket Motor Testing - Solid Fuels

SMAQMD Rule 401 - Ringelmann Chart

SIP Approved: 02-01-1984 (49 FR 3987)
04-19-1983 rule version is SIP approved

Rule Description: This rule limits the discharge of air contaminants into the atmosphere through visible emissions and opacity limitations.

Compliance Status: The rocket motor tests are never more than 3 minutes in duration and they are never less than 1 hour apart. Therefore, the permittee complies with this regulation.

The following SMAQMD rule is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record:

SMAQMD Rule 406 - Specific Contaminants

SIP Approved: 12-05-1984 (49 FR 47490)
12-06-1978 rule version is SIP approved

Rule Description: This rule regulates emissions of sulfur compounds and combustion contaminants by limiting emission concentrations of SO2 and particulate matter (PM). The rule's emission limits are 0.2% SO2 by volume and 0.1 grains PM/ft3 at 12% CO2.

Compliance Status: This requirement was not intended for unconfined emissions. Particulate emissions from the rocket testing are created right before the gases exit the rocket thus there is no stack for sampling. The high temperature and flow also make it impossible to verify compliance with this rule. Therefore, rocket testing shall be treated as a fugitive source and as such, not subject to this rule.

SMAQMD Rule 420 - Sulfur Content of Fuels

SIP Approved: 12-05-1984 (49 FR 47490)
08-*13-1981 rule version is SIP approved*

Rule Description: This rule regulates emissions of sulfur compounds from combustion of fuels.

Compliance Status: Rocket motor fuels meet the requirements of this rule.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 9 - Rocket Motor Testing - Solid Fuels (continued)

The following federal regulation is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record:

40 CFR 63 Subpart PPPPP National Emission Standards for Hazardous Air Pollutants: Engine Test Cells/Stands (begin at 63.9280)

Promulgated: 05-27-2003 (68 FR 28774)

Rule Description: This NESHAP establishes national emission standards for hazardous air pollutants for engine test cells/stands located at major sources of hazardous air pollutants (HAP) emissions.

Compliance Status: 40 CFR 63.9290(d)(2) exempts "any portion of the affected source used exclusively for testing rocket engines" from all requirements of the NESHAP

Permit Conditions on SMAQMD Rule 201 Permits to Operate

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permits to Operate limit emission concentrations, limit mass emissions, and require recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201 permit that are not applicable federally enforceable requirements.

PO No.	Permit conditions that are not federally enforceable
66, 68	Condition Nos. 1 and 2 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.
71	Condition No. 1 - This is an administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.
18853 18859 20703	Condition Nos. 1, 2, 3 and 4 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.

Compliance Status: The permittee's equipment complies with the SMAQMD Rule 201 permit conditions.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 10 - Rocket Motor Testing - Liquid and Solid Fuels

SMAQMD Rule 401 - Ringelmann Chart

SIP Approved: 02-01-1984 (49 FR 3987)
04-19-1983 rule version is SIP approved

Rule Description: This rule limits the discharge of air contaminants into the atmosphere through visible emissions and opacity limitations.

Compliance Status: The rocket motor tests are never more than 3 minutes in duration and they are never less than 1 hour apart. Therefore, the permittee complies with this regulation.

Visible emissions from the associated oxidizer and fuel flares are less than 20% opacity.

The following SMAQMD rule is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record:

SMAQMD Rule 406 - Specific Contaminants

SIP Approved: 12-05-1984 (49 FR 47490)
12-06-1978 rule version is SIP approved

Rule Description: This rule regulates emissions of sulfur compounds and combustion contaminants by limiting emission concentrations of SO2 and particulate matter (PM). The rule's emission limits are 0.2% SO2 by volume and 0.1 grains PM/ft3 at 12% CO2.

Compliance Status: This requirement was not intended for unconfined emissions. Particulate emissions from the rocket testing are created right before the gases exit the rocket thus there is no stack for sampling. The high temperature and flow also make it impossible to verify compliance with this rule. Therefore, rocket testing shall be treated as a fugitive source and as such, not subject to this rule.

SMAQMD Rule 420 - Sulfur Content of Fuels

SIP Approved: On 12/05/84 (49 FR 47490):

Rule Description: This rule regulates emissions of sulfur compounds from combustion of fuels.

Compliance Status: Rocket motor fuels meet the requirements of this rule.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 10 - Rocket Motor Testing - Liquid and Solid Fuels (continued)

The following federal regulation is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record:

40 CFR 63 Subpart PPPPP National Emission Standards for Hazardous Air Pollutants: Engine Test Cells/Stands (begin at 63.9280)

Promulgated: 05-27-2003 (68 FR 28774)

Rule Description: This NESHAP establishes national emission standards for hazardous air pollutants for engine test cells/stands located at major sources of hazardous air pollutants (HAP) emissions.

Compliance Status: 40 CFR 63.9290(d)(2) exempts "any portion of the affected source used exclusively for testing rocket engines" from all requirements of the NESHAP

Permit Conditions on SMAQMD Rule 201 Permits to Operate

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permits to Operate limit emission concentrations, limit mass emissions, and require recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201 permit that are not applicable federally enforceable requirements.

PO No.	Permit conditions that are not federally enforceable
8633 8641 9284 9328	Condition Nos. 1 and 2 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.
21015 21132	Condition Nos. 1, 2 and 3 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.

Compliance Status: The permittee's equipment complies with the SMAQMD Rule 201 permit conditions.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 11 - Abrasive Blasting Unit

SMAQMD Rule 401 - Ringelmann Chart

SIP Approved: 02-01-1984 (49 FR 3987)
04-19-1983 rule version is SIP approved

Rule Description: This rule limits the discharge of air contaminants into the atmosphere through visible emissions and opacity limitations.

Compliance Status: Each abrasive blasting unit is vented through a baghouse and is therefore not expected to have any visible emissions. The units are inspected annually by SMAQMD staff and have been found to be in compliance this regulation.

SMAQMD Rule 404 – Particulate Matter

SIP Approved: 07-01-1987 (52 FR 26148)
11-20-1984 rule version is SIP approved

Rule Description: This rule regulates emissions of particulate matter by establishing emission concentration limits.

Compliance Status: These abrasive blasting units are vented through baghouses. Therefore, particulate matter emissions should be well below 0.1 grains/dscf.

Permit Conditions on SMAQMD Rule 201 Permits to Operate

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permits to Operate limit emission concentrations, limit mass emissions, and require recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201 permit that are not applicable federally enforceable requirements.

PO No.	Permit conditions that are not federally enforceable
6385 6386 8732 8733	Condition Nos. 1 and 2 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation.
8532	Condition Nos. 1, 2 and 3 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 11 - Abrasive Blasting Unit (continued)

PO No.	Permit conditions that are not federally enforceable
9963	Condition Nos. 1 and 2 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.
20917	Conditions No. 1, 2 and 3 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.

Compliance Status: The permittee's equipment complies with the SMAQMD Rule 201 permit conditions.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 12 - Dry Material Grinding System

SMAQMD Rule 401 - Ringelmann Chart

SIP Approved: 02-01-1984 (49 FR 3987)
04-19-1983 rule version is SIP approved

Rule Description: This rule limits the discharge of air contaminants into the atmosphere through visible emissions and opacity limitations.

Compliance Status: The RDX/HMX grinding system unit is vented through four baghouses (two primary and two secondary). Therefore, no visible emissions are expected from this process. The units are inspected annually by SMAQMD staff and have been found to be in compliance with this regulation.

The grinding station (Microatomizer, 2 DH Micropulverizer and Raymond Mill processes) is vented through baghouses, rotoclones and a water wash system. Therefore, no visible emissions are expected from this process. The units are inspected annually by SMAQMD staff and have been found to be in compliance with this regulation.

SMAQMD Rule 404 – Particulate Matter

SIP Approved: 07-01-1987 (52 FR 26148)
11-20-1984 rule version is SIP approved

Rule Description: This rule regulates emissions of particulate matter by establishing emission concentration limits.

Compliance Status: The RDX/HMX grinding system is vented through four baghouses (two primary and two secondary). Therefore, particulate matter emissions should be well below 0.1 grains per dscf.

The grinding station (Microatomizer, 2 DH Micropulverizer and Raymond Mill processes) is vented through baghouses, rotoclones, and a water wash system. Therefore, particulate matter emissions should be well below 0.1 grains per dscf.

Permit Conditions on SMAQMD Rule 201 Permits to Operate

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permits to Operate limit emission concentrations, limit mass emissions, and require recordkeeping and reporting.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 12 - Dry Material Grinding System (continued)

The following table indicates the conditions on the SMAQMD Rule 201 permit that are not applicable federally enforceable requirements.

PO No.	Permit conditions that are not federally enforceable
157 158 7608 1401 1402	Condition Nos. 1 and 2 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation.
7104 17904	Condition Nos. 1, 2 and 3 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.

Compliance Status: The permittee's equipment complies with the SMAQMD Rule 201 permit conditions.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 13 - Rocket Motor Dissection Process

SMAQMD Rule 401 - Ringelmann Chart

SIP Approved: 02-01-1984 (49 FR 3987)
04-19-1983 rule version is SIP approved

Rule Description: This rule limits the discharge of air contaminants into the atmosphere through visible emissions and opacity limitations.

Compliance Status: The rocket motor dissection process is inspected annually by SMAQMD staff and has been found to be in compliance with this regulation.

SMAQMD Rule 403 – Fugitive Dust

SIP Approved: 12-05-1984 (49 FR 47490)
11-29-1983 rule version is SIP approved

Rule Description: This rule regulates operations which periodically may cause fugitive dust emissions into the atmosphere.

Compliance Status: the permittee has taken reasonable precautions to prevent fugitive dust from being airborne beyond the property line.

The following SMAQMD rule is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record:

SMAQMD Rule 404 – Particulate Matter

SIP Approved: 07-01-1987 (52 FR 26148)
11-20-1984 rule version is SIP approved

Rule Description: This rule regulates emissions of particulate matter by establishing emission concentration limits.

Compliance Status: Particulate emissions from the rocket motor dissection process are unconfined. Therefore, the rocket motor dissecting process shall be treated as a fugitive source and as such, not subject to this rule.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 13 - Rocket Motor Dissection Process (continued)

Permit Conditions on SMAQMD Rule 201 Permits to Operate

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permits to Operate limit emission concentrations, limit mass emissions, and require recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201 permit that are not applicable federally enforceable requirements.

PO No.	Permit conditions that are not federally enforceable
22029	Condition Nos. 1, 2, 3 and 5 - These are administrative or emission requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.
22040	Condition Nos. 1, 2, 3 and 4 - These are administrative or emission requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.

Compliance Status: The permittee's equipment complies with the SMAQMD Rule 201 permit conditions.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 14 - Particulate Collection System - Dry

SMAQMD Rule 401 - Ringelmann Chart

SIP Approved: 02-01-1984 (49 FR 3987)
04-19-1983 rule version is SIP approved

Rule Description: This rule limits the discharge of air contaminants into the atmosphere through visible emissions and opacity limitations.

Compliance Status: These baghouses are air pollution control equipment and are not expected to have any visible emissions. The units are inspected annually by SMAQMD staff and have been found to be in compliance with this regulation.

SMAQMD Rule 404 – Particulate Matter

SIP Approved: 07-01-1987 (52 FR 26148)
11-20-1984 rule version is SIP approved

Rule Description: This rule regulates emissions of particulate matter by establishing emission concentration limits.

Compliance Status: Particulate matter emissions from the baghouses are well below 0.1 grains per dscf.

Permit Conditions on SMAQMD Rule 201 Permits to Operate

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permits to Operate limit emission concentrations, limit mass emissions, and require recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201 permit that are not applicable federally enforceable requirements.

PO No.	Permit conditions that are not federally enforceable
277 7455 7456 8588	Condition Nos. 1 and 2 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.
15125 21653 21766 21973	Condition Nos. 1, 2 and 3 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 14 - Particulate Collection System - Dry (continued)

PO No.	Permit conditions that are not federally enforceable
22170 22225 22438	Condition Nos. 1, 2, 3 and 5 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.
22888	Condition Nos. 1, 2, 3 and 4 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.

Compliance Status: The permittee's equipment complies with the SMAQMD Rule 201 permit conditions.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 15 - Particulate Collection System - Wet Scrubber

SMAQMD Rule 401 - Ringelmann Chart

SIP Approved: 02-01-1984 (49 FR 3987)
04-19-1983 rule version is SIP approved

Rule Description: This rule limits the discharge of air contaminants into the atmosphere through visible emissions and opacity limitations.

Compliance Status: This scrubber is air pollution control equipment and is not expected to have any visible emissions. This unit is inspected annually by SMAQMD staff and has been found to be in compliance with this regulation.

SMAQMD Rule 404 – Particulate Matter

SIP Approved: 07-01-1987 (52 FR 26148)
11-20-1984 rule version is SIP approved

Rule Description: This rule regulates emissions of particulate matter by establishing emission concentration limits.

Compliance Status: Particulate matter emissions from the scrubber are well below 0.1 grains per dscf.

Permit Conditions on SMAQMD Rule 201 Permit to Operate

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permits to Operate limit emission concentrations, limit mass emissions, and require recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201 permit that are not applicable federally enforceable requirements.

PO No.	Permit conditions that are not federally enforceable
165	Condition Nos. 1 and 2 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 16 - Aerospace Coating Operation (Subject to Aerospace NESHAP GG)

SMAQMD Rule 401 - Ringelmann Chart

SIP Approved: 02-01-1984 (49 FR 3987)
04-19-1983 rule version is SIP approved

Rule Description: This rule limits the discharge of air contaminants into the atmosphere through visible emissions and opacity limitations.

Compliance Status: All coating operations are performed inside a paint spray booth equipped with particulate controls (filters). Therefore, visible emissions from these units are negligible. These units are observed in operation annually by SMAQMD staff and have been found to be in compliance with this regulation.

SMAQMD Rule 404 - Particulate Matter

SIP Approved: 07-01-1987 (52 FR 26148)
11-20-1984 rule version is SIP approved

Rule Description: This rule regulates emissions of particulate matter by establishing emission concentration limits.

Compliance Status: These coating operations are performed inside paint spray booths equipped with particulate filters. Therefore, particulate matter emissions should be well below 0.1 grains per dscf.

SMAQMD Rule 456 - Aerospace Assembly and Component Coating Operations

SIP Approved: 11/09/98 (63 FR 60214)
09/05/96 rule version is SIP approved

Rule Description: This rule regulates emissions of VOCs from the application and use of coatings to aerospace components.

Compliance Status: The permittee is in compliance with the requirements of this rule.

As allowed under the “Development of Applications and Permits for Outdated SIP Requirements” provisions of White Paper Number 2 (Lydia Wegman, U.S. EPA, 04-05-1996), the requirements of the most recent version of SMAQMD Rule 456 (10-23-2008) will be enforced.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 16 - Coating Operation - Aerospace Coating Subject to Aerospace NESHAP GG (continued)

40 CFR 63 Subpart GG NESHAP for Aerospace Manufacturing and Rework Facilities (begin at 63.741)

Promulgated: 09-01-1996 (60 FR 45956)

Rule Description: This NESHAP establishes national emission standards for HAPs from the manufacture or rework of commercial, civil or military aerospace vehicles or components.

Compliance Status: The permittee is in compliance with the applicable requirements of this regulation. This facility does not perform any coating with inorganic HAPs as described in 40 CFR 63.745(g) nor does it perform chemical milling maskant operations as per 40 CFR 63.747.

A. Applicable Requirements

63.744(a) - The permittee is subject to these requirements. The permittee conducts spray gun cleaning operations in enclosed gun cleaners.

63.745 - Primers and topcoats used by this facility meet the HAP and VOC limits specified in this regulation, which are the same as under SMAQMD Rule 456. The application methods are also the same as under SMAQMD Rule 456. The permittee does not use coatings containing inorganic HAPs.

63.746 - The permittee depaints less than six completed aerospace vehicles in a calendar year. Therefore, this facility is not subject to this section.

63.747 - The permittee does not conduct any chemical milling maskant application operations and is therefore not subject to this section.

63.748 - This facility is subject to these requirements. HAP-containing waste is handled in a manner that minimizes spills.

63.749 - The permittee is subject to these requirements. The permittee has met the compliance dates specified by this regulation.

63.750 - The permittee is subject to these requirements. Compliance with this regulation has been determined in accordance with the test methods and procedures specified under this section.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 16 - Coating Operation - Aerospace Coating Subject to Aerospace NESHAP GG (continued)

63.751 - The permittee is subject to the monitoring requirements of Subsections (a) and (e). The remaining Subsections are not applicable for the reasons stated below:

Subsection (b) - This facility does not use incinerators or carbon absorbers in their coating operations.

Subsection (c) - This facility does not use coatings containing inorganic HAPs.

Subsection (d) - This facility does not conduct depainting operations as described in 63.746.

Subsection (f) - This section is not applicable to the type of monitoring required (visual inspection).

63.752 - The permittee is subject to the recordkeeping requirements of Subsections (a), (b) and (c). The remaining Subsections are not applicable for the reasons stated below:

Subsection (d) - This facility does not use coatings containing inorganic HAPs.

Subsection (e) - This facility does not conduct depainting operations as described in 63.746.

Subsection (f) - This facility does not conduct any chemical milling maskant application operations.

63.753 - The permittee is subject to the reporting requirements of Subsections (a), (b) and (c). The remaining Subsections are not applicable for the reasons stated below:

Subsection (d) - This facility does not conduct depainting operations as described in 63.746.

Subsection (e) - This facility does not conduct any chemical milling maskant application operations.

B. Streamlining of Applicable Requirements

Both the NESHAP GG and SMAQMD Rule 456 regulate <u>disposal</u> of solvent-laden materials. The NESHAP requirement is more comprehensive than SMAQMD Rule 456 thus Rule 456 Section 304.1 will be subsumed by the 40 CFR 63.744(a)(1).

Both the NESHAP and SMAQMD Rule 456 regulate <u>storage</u> of VOC-containing material. The SMAQMD Rule 456 requirement is more comprehensive than the NESHAP thus 40 CFR 63.744(a)(2) will be subsumed by Rule 456 Section 304.2.

For simplification purposes, the reporting period will be changed to coincide with the Title-V reporting periods. The reports will be due July 31 for the Jan-June period and January 31 for the Jul-Dec period.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 16 - Coating Operation - Aerospace Coating Subject to Aerospace NESHAP GG (continued)

Permit Conditions on SMAQMD Rule 201 Permits to Operate

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permits to Operate limit emission concentrations, limit mass emissions, and require recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201 permit that are not applicable federally enforceable requirements.

PO No.	Permit conditions that are not federally enforceable
150 8444	The first two conditions on the PO are not numbered - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.
17204 17205	Condition Nos. 1, 2 and 3 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 17 - Aerospace Cleaning and Surface Preparation Operation (Subject to Aerospace NESHAP GG)

SMAQMD Rule 401 - Ringelmann Chart

SIP Approved: 02-01-1984 (49 FR 3987)
04-19-1983 rule version is SIP approved

Rule Description: This rule limits the discharge of air contaminants into the atmosphere through visible emissions and opacity limitations.

Compliance Status: The solvent cleaning and surface preparation activities are not expected to cause any visible emissions. These units are observed in operation annually by SMAQMD staff and have been found to be in compliance with this rule.

SMAQMD Rule 456 – Aerospace Assembly and Component Coating Operations

SIP Approved: 11/09/98 (63 FR 60214)
09/05/96 rule version is SIP approved

Rule Description: This rule regulates emissions of VOCs from cleaning solvents and surface preparation.

Compliance Status: The permittee is in compliance with the requirements of this rule.

As allowed under the "Development of Applications and Permits for Outdated SIP Requirements" provisions of White Paper Number 2 (Lydia Wegman, U.S. EPA, 04-05-1996), the requirements of the most recent version of SMAQMD Rule 456 (10-23-2008) will be enforced.

40 CFR 63 Subpart GG NESHAP for Aerospace Manufacturing and Rework Facilities (begin at 63.741)

Promulgated: 09-01-1996 (60 FR 45956)

Rule Description: This NESHAP establishes national emission standards for HAPs from the manufacture or rework of commercial, civil or military aerospace vehicles or components.

Compliance Status: The permittee is in compliance with the applicable requirements of this regulation.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 17 - Aerospace Cleaning and Surface Preparation Operation (Subject to Aerospace NESHAP GG) (continued)

Permit Conditions on SMAQMD Rule 201 Permit to Operate

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permit to Operate limit emission concentrations, limit mass emissions, and require recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201 permit that are not applicable federally enforceable requirements.

PO No.	Permit conditions that are not federally enforceable
17489	Condition Nos. 1, 2 and 3 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 18 - Aerospace Cleaning and Surface Preparation (Not Subject to Aerospace NESHAP GG)

SMAQMD Rule 401 - Ringelmann Chart

SIP Approved: 02-01-1984 (49 FR 3987)
04-19-1983 rule version is SIP approved

Rule Description: This rule limits the discharge of air contaminants into the atmosphere through visible emissions and opacity limitations.

Compliance Status: The solvent cleaning and surface preparation activities are not expected to cause any visible emissions. These units are observed in operation annually by SMAQMD staff and have been found to be in compliance with this rule.

SMAQMD Rule 456 – Aerospace Assembly and Component Coating Operations

SIP Approved: 11/09/98 (63 FR 60214)
09/05/96 rule version is SIP approved

Rule Description: This rule regulates emissions of VOCs from cleaning solvents and surface preparation.

Compliance Status: The permittee is in compliance with the requirements of this rule.

As allowed under the "Development of Applications and Permits for Outdated SIP Requirements" provisions of White Paper Number 2 (Lydia Wegman, U.S. EPA, 04-05-1996), the requirements of the most recent version of SMAQMD Rule 456 (10-23-2008) will be enforced.

The following federal regulation is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record:

40 CFR 63 Subpart GG NESHAP for Aerospace Manufacturing and Rework Facilities (begin at 63.741)

Promulgated: 09-01-1996 (60 FR 45956)

Rule Description: This NESHAP establishes national emission standards for HAPs from the manufacture or rework of commercial, civil or military aerospace vehicles or components.

Compliance Status: 40 CFR 63.741(h) provides an exemption for activities associated with Space Vehicles as follows.

(h) Regulated activities associated with space vehicles designed to

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 18 - Aerospace Cleaning and Surface Preparation (Not Subject to Aerospace NESHAP GG) (continued)

travel beyond the limit of the earth's atmosphere, including but not limited to satellites, space stations, and the Space Shuttle System (including orbiter, external tanks, and solid rocket boosters), are exempt from the requirements of this subpart, except for depainting operations found in §63.746.

Since this process only allows the solvent cleaning and surface preparation operation to be performed on Space Vehicles as defined in 40 CFR 63.742 (see Condition No. 4) the requirements of 40 CFR 63 Subpart GG are not applicable.

Permit Conditions on SMAQMD Rule 201 Permit to Operate

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permit to Operate limit emission concentrations, limit mass emissions, and require recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201 permit that are not applicable federally enforceable requirements.

PO No.	Permit conditions that are not federally enforceable
20419	Condition Nos. 1, 2 and 3 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 19 - Aerospace Coating Operation (Not Subject to Aerospace NESHAP GG)

SMAQMD Rule 401 - Ringelmann Chart

SIP Approved: 02-01-1984 (49 FR 3987)
04-19-1983 rule version is SIP approved

Rule Description: This rule limits the discharge of air contaminants into the atmosphere through visible emissions and opacity limitations.

Compliance Status: All coating operations are performed inside a paint spray booth equipped with particulate controls (filters). Therefore, visible emissions from these units are negligible. These units are observed in operation annually by SMAQMD staff and have been found to be in compliance with this rule.

SMAQMD Rule 404 – Particulate Matter

SIP Approved: 07-01-1987 (52 FR 26148)
11-20-1984 rule version is SIP approved

Rule Description: This rule regulates emissions of particulate matter by establishing emission concentration limits.

Compliance Status: All coating operations are performed inside a paint spray booth equipped with particulate controls (filters). Therefore, particulate matter emissions should be well below 0.1 grains per dscf.

SMAQMD Rule 456 – Aerospace Assembly and Component Coating Operations

SIP Approved: 11/09/98 (63 FR 60214)
09/05/96 rule version is SIP approved

Rule Description: This rule regulates emissions of VOCs from the application and use of coatings to aerospace components.

Compliance Status: The permittee is in compliance with the requirements of this rule.

As allowed under the "Development of Applications and Permits for Outdated SIP Requirements" provisions of White Paper Number 2 (Lydia Wegman, U.S. EPA, 04-05-1996), the requirements of the most recent version of Rule 456 (07-23-1998) will be enforced.

For PO 21140 the spray nozzle sprays the interior of the missile chamber as the chamber moves from several inches from the open end

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 19 - Aerospace Coating Operation (Not Subject to Aerospace NESHAP GG) (continued)

to the closed end and back. Since the coating is only applied to the interior of the missile chamber, the transfer efficiency is expected to exceed 65%. Since this method of application is not one of the approved methods of operation listed in SMAQMD Rule 456 Sections 303.1-303.8, this method of application must be approved in writing by both the SMAQMD APCO and the U.S. Environmental Protection Agency pursuant to Section 303.9. U.S. EPA approval of this type of coating application method was given in a letter, dated October 13, 2004, from Andrew Steckel, U.S. EPA Region 9, to Dave Grose, SMAQMD Stationary Source Division Manager.

The following federal regulation is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record:

40 CFR 63 Subpart GG NESHAP for Aerospace Manufacturing and Rework Facilities (begin at 63.741)

Promulgated: 09-01-1996 (60 FR 45956)

Rule Description: This NESHAP establishes national emission standards for HAPs from the manufacture or rework of commercial, civil or military aerospace vehicles or components.

Compliance Status: 40 CFR 63.741(h) provides an exemption for activities associated with Space Vehicles as follows.

(h) Regulated activities associated with space vehicles designed to travel beyond the limit of the earth's atmosphere, including but not limited to satellites, space stations, and the Space Shuttle System (including orbiter, external tanks, and solid rocket boosters), are exempt from the requirements of this subpart, except for depainting operations found in §63.746.

Condition No. 7 on the Title V permit only allows:

1. the application of Specialty Coatings as defined in 40 CFR Part 63 Subpart GG Appendix A.

2. the application of coatings to Space Vehicles as defined in 40 CFR 63.742 (see Condition No. 4) the requirements of 40 CFR 63 Subpart GG are not applicable.

Therefore the requirements of 40 CFR 63 Subpart GG are not applicable.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 19 - Aerospace Coating Operation (Not Subject to Aerospace NESHAP GG) (continued)

Permit Conditions on SMAQMD Rule 201 Permits to Operate

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permits to Operate limit emission concentrations, limit mass emissions, and require recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201 permit that are not applicable federally enforceable requirements.

PO No.	Permit conditions that are not federally enforceable
153 5811 7497 8217	The first two unnumbered conditions are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.
20652	Condition Nos. 1, 2, 3 and 5 - These are administrative or emission requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.
21140	Condition Nos. 1, 2 and 3 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 20 - Coating Operation - Metal and Wood

SMAQMD Rule 401 - Ringelmann Chart

SIP Approved: 02-01-1984 (49 FR 3987)
04-19-1983 rule version is SIP approved

Rule Description: This rule limits the discharge of air contaminants into the atmosphere through visible emissions and opacity limitations.

Compliance Status: All coating operations are performed inside a paint spray booth equipped with particulate controls (filters). Therefore, visible emissions from this unit are well below 20% opacity. These units are observed in operation annually by SMAQMD staff and have been found to be in compliance with this rule.

SMAQMD Rule 404 – Particulate Matter

SIP Approved: 07-01-1987 (52 FR 26148)
11-20-1984 rule version is SIP approved

Rule Description: This rule regulates emissions of particulate matter by establishing emission concentration limits.

Compliance Status: The coating operations are performed inside a paint spray booth equipped with particulate controls (filters). Therefore, particulate matter emissions should be well below 0.1 grains per dscf.

SMAQMD Rule 451 – Surface Coating of Miscellaneous Metal Parts and Products

SIP Approved: 11-13-1998 (63 FR 63410)
12-05-1996 rule version is SIP approved
10-28-2010 rule version is the current version

Rule Description: This rule regulates emissions of VOCs from the application of coatings to metal products.

Compliance Status: Coating operations performed under PO 7801 are subject to this rule when metal parts are coated. The permittee will comply with all applicable sections of this rule.

As allowed under the “Development of Applications and Permits for Outdated SIP Requirements” provisions of White Paper Number 2 (Lydia Wegman, U.S. EPA, 04-05-1996), the requirements of the most recent version of SMAQMD Rule 451 (10-28-2010) will be enforced.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 20 - Coating Operation - Metal and Wood (continued)

SMAQMD Rule 463 – Wood Products Coatings

SIP Approved: 04-09-2010 (75 FR 18068)
09-25-2008 rule version is SIP approved

Rule Description: This rule regulates emissions of VOCs from the application and use of coatings to wood products.

Compliance Status: Coating operations performed under PO 7801 are subject to this rule when wood products are coated. The permittee will comply with all applicable sections of this rule.

The following federal regulation is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record:

40 CFR 63 Subpart MMMM NESHAP for Surface Coating of Miscellaneous Metal Parts and Products (begin at 63.3880)

Promulgated: 01-02-2004 (69 FR 157)

Rule Description: This NESHAP establishes national emission standards for HAPs from the coating of miscellaneous metal parts and products.

Compliance Status: PO 7801 is not subject to this regulation because the amount of coatings used falls within the exemption level specified in 40 CFR 63.3881(b).

Permit Conditions on SMAQMD Rule 201 Permit to Operate

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permit to Operate limit coating and cleanup materials VOC content, limit coating application methods and require recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201 permit that are not applicable federally enforceable requirements.

PO No.	Permit conditions that are not federally enforceable
7801	The first two unnumbered conditions are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 21 - RDX Drying Facility

SMAQMD Rule 401 - Ringelmann Chart

SIP Approved: 02-01-1984 (49 FR 3987)
04-19-1983 rule version is SIP approved

Rule Description: This rule limits the discharge of air contaminants into the atmosphere through visible emissions and opacity limitations.

Compliance Status: The RDX drying operations are vented through condensers. Therefore, visible emissions from these units are negligible. These units are observed in operation annually by SMAQMD staff and have been found to be in compliance with this rule.

SMAQMD Rule 441 – Organic Solvents

SIP Approved: 01-24-1985 (50 FR 3338)
11-29-1983 rule version is SIP approved

Rule Description: This rule limits emissions of volatile organic compounds into the atmosphere that may result from the use of organic solvents

Compliance Status: The VOCs emitted from the RDX drying facilities are not photochemically reactive and are dried at 140 deg F temperature. Therefore, the applicable limit pursuant to this rule is 2,970 pounds of organic materials per day. The facility complies with this limit by complying with its local permit to operate which limits VOC emissions to 150 lb/day.

Therefore, the requirements of this rule will be streamlined and subsumed under the local permits to operate.

Permit Conditions on SMAQMD Rule 201 Permit to Operate

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permits to Operate limit emission concentrations, limit mass emissions, and require recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201 permit that are not applicable federally enforceable requirements.

PO No.	Permit conditions that are not federally enforceable
7779 7780	Condition Nos. 1, 2 and 3 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 22 - Degreaser, Non-vapor

The following SMAQMD rule is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record:

SMAQMD Rule 454 – Degreasing Operations

SIP Approved: 04-09-2010 (75 FR 18068)
09-25-2008 rule version is SIP approved

Rule Description: This rule limits emissions of volatile organic compounds into the atmosphere that may result from the use of VOC containing solvents in degreasers.

Compliance Status: SMAQMD Rule 454 Section 110.3 provides the following exemption -

> Effective September 25, 2009, the provisions of this rule shall not apply to degreasers which use solvents that contain 25 grams per liter or less VOCs including water and exempt compounds, as determined by Sections 502.5 and 502.6.

Condition No. 2 of the Title V permit requires the use of degreasing solvents with a VOC content not exceeding 25 grams/liter. Therefore, operation of the degreaser meets the exemption requirements of Section 110.3 and is not subject to the requirements of this rule.

Permit Conditions on SMAQMD Rule 201 Permit to Operate

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permits to Operate limit emission concentrations, limit mass emissions, and require recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201 permit that are not applicable federally enforceable requirements.

PO No.	Permit conditions that are not federally enforceable
6968 7075	The two unnumbered conditions are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 23 - Bowl Cleaning Station

The following SMAQMD rule is not an applicable federal requirement but is discussed here to document the non-applicability determination for the record:

SMAQMD Rule 441 – Organic Solvents

SIP Approved: 01-24-1985 (50 FR 3338)
11-29-1983 rule version is SIP approved

Rule Description: This rule limits emissions of volatile organic compounds into the atmosphere that may result from the use of organic solvents

Compliance Status: This operation is not subject to this rule because it is subject to Rule 456 Aerospace Assembly and Component Coating Operations. Section 102 of Rule 456 states that the requirements of Rule 441 shall not apply to operations subject to Rule 456.

SMAQMD Rule 454 – Degreasing Operations

SIP Approved: 04-09-2010 (75 FR 18068)
09-25-2008 rule version is SIP approved

Rule Description: This rule limits emissions of volatile organic compounds into the atmosphere that may result from the use of organic solvents

Compliance Status: SMAQMD Rule 454 Section 110.7 provides the following exemption -

> The VOC content limits in Sections 302.2 and 302.3 do not apply to degreasing of tools, equipment and machinery, regulated under Rule 456, AEROSPACE ASSEMBLY AND COMPONENT COATING OPERATIONS, and aerospace products using solvents that comply with the surface preparation and cleanup VOC limits in Section 304.7 of Rule 456, AEROSPACE ASSEMBLY AND COMPONENT COATING OPERATIONS.

The bowl cleaning operation is not exempt from the other requirements of this rule such as record keeping. This rule requires monthly records of solvents used. Since the NESHAP 40 CFR 63 Subpart GG requires annual usage records, the permit will require both monthly and annual records.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 23 - Bowl Cleaning Station (continued)

SMAQMD Rule 456 – Aerospace Assembly and Component Coating Operations

SIP Approved: 11/09/98 (63 FR 60214)
09/05/96 rule version is SIP approved

Rule Description: This rule regulates emissions of VOCs from cleaning solvents and surface preparation associated with aerospace coating operations.

Compliance Status: The permittee is in compliance with the requirements of this rule.

This operation is subject to this rule because it is a "cleaning" of "tooling" operation as defined by Sections 209 and 255 of this rule, respectively. The permittee is in compliance with all applicable requirements of this rule.

40 CFR 63 Subpart GG NESHAP for Aerospace Manufacturing and Rework Facilities (begin at 63.741)

Promulgated: 09-01-1996 (60 FR 45956)

Rule Description: This NESHAP establishes national emission standards for HAPs from the manufacture or rework of commercial, civil or military aerospace vehicles or components.

Compliance Status: The permittee is in compliance with the material cleaning, handling and waste disposal requirements of the regulation.

Permit Conditions on SMAQMD Rule 201 Permit to Operate

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permits to Operate limit emission concentrations, limit mass emissions, and require recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201 permit that are not applicable federally enforceable requirements.

PO No.	Permit conditions that are not federally enforceable
154 155	Condition Nos. 1 and 2 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 24 - Gasoline Storage and Dispensing Facility

SMAQMD Rule 448 – Gasoline Transfer Into Stationary Storage Containers

SIP Approved: 01-23-1996 (61 FR 1716)
02-02-1995 rule version is SIP approved
02-26-2009 is the current rule version

Rule Description: This rule limits emissions resulting from the transfer of gasoline into any stationary storage container or delivery vessel, or from the pump-out of gasoline from any stationary storage container, delivery vessel, or vehicle fuel tank.

Compliance Status: The gasoline dispensing facility is in compliance with all the applicable requirements of this rule

As allowed under the "Development of Applications and Permits for Outdated SIP Requirements" provisions of White Paper Number 2 (Lydia Wegman, U.S. EPA, 04-05-1996), the requirements of the most recent version of SMAQMD Rule 448 (02-26-2009) will be enforced.

SMAQMD Rule 449 – Transfer of Gasoline into Vehicle Fuel Tanks

SIP Approved: 03-24-2003 (68 FR 14156)
09-26-2002 rule version is SIP approved
02-26-2009 is the current rule version

Rule Description: This rule limits the emissions of gasoline vapors into the atmosphere when motor vehicle fuel tanks are filled.

Compliance Status: The gasoline dispensing facility is in compliance with all the applicable requirements of this rule.

As allowed under the "Development of Applications and Permits for Outdated SIP Requirements" provisions of White Paper Number 2 (Lydia Wegman, U.S. EPA, 04-05-1996), the requirements of the most recent version of SMAQMD Rule 448 (02-26-2009) will be enforced.

Permit Conditions on SMAQMD Rule 201 Permit to Operate

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permits to Operate limit emission concentrations, limit mass emissions and require recordkeeping and reporting.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 24 - Gasoline Storage and Dispensing Facility (continued)

The following table indicates the conditions on the SMAQMD Rule 201 permit that are not applicable federally enforceable requirements.

PO No.	Permit conditions that are not federally enforceable
17375	Condition Nos. 1, 2 and 3 - These are administrative requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 25 - Pilot Plant Chemical Manufacturing Process

SMAQMD Rule 401 - Ringelmann Chart

SIP Approved: 02-01-1984 (49 FR 3987)
04-19-1983 rule version is SIP approved

Rule Description: This rule limits the discharge of air contaminants into the atmosphere through visible emissions and opacity limitations.

Compliance Status: The visible emissions from this process are negligible. This process has been observed in operation annually by SMAQMD staff and has been found to be in compliance with this rule.

SMAQMD Rule 441 – Organic Solvents

SIP Approved: 01-24-1985 (50 FR 3338)
11-29-1983 rule version is SIP approved

Rule Description: This rule limits emissions of volatile organic compounds into the atmosphere that may result from the use of organic solvents

Compliance Status: The chemical manufacturing process has a VOC emission limit of 38 pounds per quarter, which is well below the emission limits established in this rule.

Permit Conditions on SMAQMD Rule 201 Permit to Operate

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permits to Operate limit emission concentrations, limit mass emissions, and require recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201 permit that are not applicable federally enforceable requirements.

PO No.	Permit conditions that are not federally enforceable
20492	Condition Nos. 1, 2, 3 and 7 - These are administrative and emission requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Section 26 - Soluble Mandrel Manufacturing Process

SMAQMD Rule 401 - Ringelmann Chart

SIP Approved: 02-01-1984 (49 FR 3987)
04-19-1983 rule version is SIP approved

Rule Description: This rule limits the discharge of air contaminants into the atmosphere through visible emissions and opacity limitations.

Compliance Status: The visible emissions from this process are negligible. This process has been observed in operation annually by SMAQMD staff and has been found to be in compliance with this rule.

SMAQMD Rule 441 – Organic Solvents

SIP Approved: 01-24-1985 (50 FR 3338)
11-29-1983 rule version is SIP approved

Rule Description: This rule limits emissions of volatile organic compounds into the atmosphere that may result from the use of organic solvents

Compliance Status: The soluble mandrel manufacturing process has a VOC emission limit of 42 pounds per quarter, which is well below the emission limits established in this rule.

Permit Conditions on SMAQMD Rule 201 Permit to Operate

Rule Description: The conditions of operation on the SMAQMD Rule 201 Permits to Operate limit emission concentrations, limit mass emissions, and require recordkeeping and reporting.

The following table indicates the conditions on the SMAQMD Rule 201 permit that are not applicable federally enforceable requirements.

PO No.	Permit conditions that are not federally enforceable
21734	Conditions No. 1, 2, 3 and 5 - These are administrative and emission requirements not contained in any SIP-approved rule or other federally-enforceable regulation. All other permit conditions are federally enforceable.

K. APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS
Equipment Specific Requirements
Permit condition consistency for California ATCM for Stationary IC Engines

California Air Toxics Control Measure for Stationary Compression Ignition Engines (CCR, Title 17, Section 93115):

The following SMAQMD Rule 201 Permits to Operate for diesel fueled IC engines include the requirements of this ATCM. This ATCM is not federally enforceable. However, the Title V permit will include these ATCM requirements also, thus making them federally enforceable. This will simplify compliance by bringing consistency between the operating conditions on the SMAQMD Rule 201 permit and the Title V permit.

Equipment	PO No.			
IC Engine, diesel fueled	10294 10408 10421 10422 10423 10426	10434 10435 10436 10437 10438 10439	10440 10441 10442 10443 10444	10445 10446 10779 14748 15335

Compliance Status: The permittee is in compliance with these requirements.

L. TITLE V PERMIT RECOMMENDATION

It is recommended that the Aerojet - Sacramento Operations Title V Federal Operating permit be renewed.

See proposed Title V Federal Operating Permit No. TV2009-09-01 for permit conditions.

Approved by: *Jorge DeGuzman* Date: *June 7, 2012*

ATTACHMENT A

SMAQMD RULES THAT ARE

"APPLICABLE FEDERALLY ENFORCEABLE REQUIREMENTS"

FOR AEROJET - SACRAMENTO OPERATIONS

Rule is Applicable	Rule is SIP Approved	Rule No.	Rule Title	Is the Rule an "Applicable Federally Enforceable Requirement"?
●	●	101	General Provisions and Definitions 09-03-1998 version	**Yes** - no related conditions are included in the permit because of general nature of the rule.
●	●	102	Circumvention 11-29-1983 version	**Yes** - no related conditions are included in the permit because of general nature of the rule.
	●	103	Exceptions 11-29-1983 version	**No** - source does not operate the type of equipment described in this rule.
	●	104	General Conformity 11-03-1994 version	**No** - the rule's purpose is to have the SMAQMD review federal conformity findings.
●	●	105	Emission Statement 04-20-1993 version	**Yes** - related conditions are included in the permit.
		107	Alternative Compliance	**No** - it is not a SIP approved rule.
●		108	Minor Violations	**No** - it is not a SIP approved rule.
●	●	201	General Permit Requirements 11-20-1984 version	**Yes** - no related conditions are included in the permit because of the general nature of the rule.
●	●	202	New Source Review 10-28-2010 version	**Yes** - related conditions are included in the permit.
		203	Prevention of Significant Deterioration	**No** - it is not a SIP approved rule.

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		204	Emission Reduction Credits	**No** - it is not a SIP approved rule.
		205	Community Bank and Priority Reserve Bank	**No** - it is not a SIP approved rule.
		206	Mobile and Transportation Source Emission Reduction Credits	**No** - it is not a SIP approved rule.
●	*	207	Title V Federal Operating Permit Program	**Yes** - related conditions are included in the permit. (*Although this is not a SIP approved rule it is applicable because it is part of the approved SMAQMD Title V Permit Program.)
		208	Acid Rain	**No** - it is not a SIP approved rule.
		209	Limiting Potential to Emit	**No** - it is not a SIP approved rule.
		210	Synthetic Minor Source Status	**No** - it is not a SIP approved rule.
●		211	MACT at Major Sources of Hazardous Air Pollutants	**No** - it is not a SIP approved rule, but the requirements of this rule are also contained in the CAA. As per EPA guidance, the MACT requirements for boilers will become applicable after the rule is finalized.
●		213	Federal Major Modifications	**No** - it is not a SIP approved rule but the requirements within it are part of EPA's NSR reform and thus federally applicable

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●	●	214	Federal New Source Review	**Yes** - related conditions are included in the permit.
		215	Agricultural Permit Requirements and New Agricultural Permit Review	**No -** it is not a SIP approved rule.
●	*	301	Stationary Source Permit Fees	**Yes** - related conditions are included in the permit. (*Although this is not a SIP approved rule it is applicable because it is part of the approved SMAQMD Title V Permit Program.)
●		302	Hearing Board Fees	**No** - it is not a SIP approved rule.
		303	Agricultural Burning Permit Fees	**No** - it is not a SIP approved rule.
●		304	Plan Fees	**No** - it is not a SIP approved rule.
●		305	Environmental Document Preparation and Processing Fees	**No** - it is not a SIP approved rule.
●		306	Air Toxics Fees	**No** - it is not a SIP approved rule.
●	●	307	Clean Air Act Fees 09-26-2002 version	**Yes** - related conditions are included in the permit.
		310	Permit Fees - Agricultural Source	**No** - it is not a SIP approved rule

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●	●	401	Ringelmann Chart 04-05-1983 version	**Yes** - related conditions are included in the permit.
●		402	Nuisance	**No** - it is not a SIP approved rule.
●	●	403	Fugitive Dust 11-29-1983 version	**Yes** - related conditions are included in the permit.
●	●	404	Particulate Matter 11-20-1984 version	**Yes** - related conditions are included in the permit. (see discussion of streamlining applicable requirements and permit shield)
●	●	405	Dust and Condensed Fumes 11-29-1983 version	**No** - the source does not operate such a process.
●	●	406	Specific Contaminants 11-29-1983 version	**Yes** - related conditions are included in the permit. (see discussion of streamlining applicable requirements and permit shield)
●	●	407	Open Burning 11-29-1983 version	**Yes** - no related conditions are included in the permit because the source does not conduct open burning.
	●	408	Incinerator Burning 11-29-1983 version	**No** - the source does not operate an incinerator.

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	●	409	Orchard Heaters 11-29-1983 version	**No** - the source does not operate orchard heaters.
	●	410	Reduction of Animal Matter 11-29-1983 version	**No** - the source does not operate equipment for the reduction of animal matter.
●	●	411	Boiler NOx 08-23-2007 version	**Yes** - related conditions are included in the permit.
●	●	412	Stationary IC Engines at Major Stationary Sources of NOx 06-01-1995 version	**Yes** - related conditions are included in the permit.
	●	413	Stationary Gas Turbines 03-24-2005 version	**No** - This source does not operate turbines.
●	●	414	Natural Gas Fired Water Heaters 08-01-1996 version	**Yes** - The permit does not contain any related conditions because the rule targets the sale of water heaters, not the operation of water heaters.
		417	Wood Burning Appliances	**No -** it is not a SIP approved rule.
●	●	420	Sulfur Content of Fuels 11-29-1983 version	**Yes** - related conditions are included in the permit. (see discussion of streamlining applicable requirements and permit shield)

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●	●	441	Organic Solvents 11-29-1983 version	**Yes** - no related conditions are included in the permit because of limited applicability.
●	●	442	Architectural Coatings 09-05-1996 version	**Yes** - related conditions are included in the permit.
	●	443	Leaks from Synthetic Organic Chemical and Polymer Manufacturing 09-05-1996 version	**No** - the source does not operate synthetic organic chemical or polymer manufacturing equipment.
	●	444	Petroleum Solvent Dry Cleaning 08-13-1981 version	**No** - the source does not operate petroleum solvent dry cleaning equipment.
	●	446	Storage of Petroleum Products 11-16-1993 version	**No** - the source does not store affected petroleum products.
	●	447	Organic Liquid Loading 04-02-1998 version	**No** - the source does not operate organic liquid loading equipment.
●	●	448	Gasoline Transfer into Stationary Storage Containers 02-02-1995 version	**Yes** - related conditions are included in the permit.
●	●	449	Transfer of Gasoline into Vehicle Fuel Tanks 09-26-2002 version	**Yes** - related conditions are included in the permit.

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	●	450	Graphic Arts Operations 12-05-1996 version	**No** - the source does not operate a graphic arts process as defined in the rule.
●	●	451	Surface Coating of Miscellaneous Metal Parts and Products 11-29-1983 version	**Yes** - related conditions are included in the permit.
	●	452	Can Coating 09-05-1996 version	**No** - the source does not operate a can coating process.
	●	453	Cutback and Emulsified Asphalt Paving Materials 11-29-1983 version	**No** - the source does not manufacture or apply cutback or emulsified asphalt paving materials.
●	●	454	Degreasing Operations 04-03-1997 version	**Yes** - related conditions are included in the permit.
	●	455	Pharmaceuticals Manufacturing 11-29-1983 version	**No** - the source does not manufacture pharmaceuticals.
●	●	456	Aerospace Coating Operations 10-23-2008 version	**Yes** - related conditions are included in the permit.
		457	Methanol Compatible Tanks	**No** - it is not a SIP approved rule.

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	●	458	Large Commercial Bread Bakeries 09-05-1996 version	**No** - the source does not produce bread products.
	●	459	Automotive, Truck and Heavy Equipment Refinishing Operations 10-02-1997 version	**No** - the source does not refinish vehicles.
●		460	Adhesives and Sealants	**No** - it is not a SIP approved rule.
●		463	Wood Products Coatings	**No** - it is not a SIP approved rule.
	●	464	Organic Chemical Manufacturing Operations 07-23-1998 version	**No** - the source does not manufacture organic chemicals.
		465	Polyester Resin Operations	**No** - it is not a SIP approved rule.
●	●	466	Solvent Cleaning 05-23-2002 version	**Yes** - related conditions are included in the permit.
		485	Municipal Landfill Gas	**No** - it is not a SIP approved rule.
		496	Large Confined Animal Facilities	**No** - it is not a SIP approved rule.
	●	501	Agricultural Burning 11-29-1983 version	**No** - the source does not conduct agricultural burning.

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●		601	Procedure before the Hearing Board	**No** - it is not a SIP approved rule.
●		602	Breakdown Conditions: Emergency Variance	**No** - it is not a SIP approved rule.
●	●	701	Emergency Episode Plan 05-27-1999 version	**Yes** - but actual facility emissions are below the applicability levels in the rule.
●		801	New Source Performance Standards	**No** - it is not a SIP approved rule. *Note: there are equivalent federal regulations.*
●		901	General Requirements	**No** - it is not a SIP approved rule. *Note: there are equivalent federal regulations.*
●		902	Asbestos	**No** - it is not a SIP approved rule. *Note: there is an equivalent federal regulation.*
●		903	Mercury	**No** - it is not a SIP approved rule. *Note: there is an equivalent federal regulation.*
●		904	Airborne Toxic Control Measures	**No** - it is not a SIP approved rule. *Note: there are equivalent federal regulations for some of the listed ATCMs.*
		1002	Fleet Inventory	**No** - it is not a SIP approved rule.

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		1003	Reduced-Emission Fleet Vehicles/Alternative Fuels	**No** - it is not a SIP approved rule.
		1005	Mobile Source Emission Reduction Credits/Banking	**No** - it is not a SIP approved rule.
		1006	Transportation Conformity	**No** - it is not a SIP approved rule.