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**RECLAIM / TITLE V FACILITY PERMIT
PERMIT TO CONSTRUCT**

COMPANY NAME: KIRKHILL -TA CO.
MAILING ADDRESS: 300 E. CYPRESS
 BREA, CA 92821
FACILITY ID: 1744
EQUIPMENT LOCATION: SAME AS ABOVE.

EQUIPMENT DESCRIPTION

APPLICATION NO. 469752

RECLAIM / TITLE V FACILITY PERMIT AMENDMENT APPLICATION
REVISION AND MODIFICATION OF RECLAIM / TITLE V FACILITY PERMIT
(Modification of Curing Oven through Replacement of Existing Burners with a Lower Rated Burner)

APPLICATION NO. 469751

PROCESS 2: RUBBER PRODUCTS MANUFACTURE
SYSTEM 5: RUBBER CURING SYSTEM

MODIFICATION OF CURING OVEN NO. 2, (D59):

BY REPLACEMENT OF:

Two Burners, Natural Gas, Induco, 0.52 MMBtu/hr, with One New Burner, Natural Gas, Immerso-Pak, Model No. IP006, 0.33 MMBtu/hr.



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SECTION H: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions And Requirements	Conditions
Process 2: RUBBER PRODUCTS MANUFACTURE					
System 5: RUBBER CURING SYSTEM					
OVEN, CURING, NATURAL GAS, INDUCO, 0.52 MMBTU/HR, 0.33 MMBTU/HR, IMMERSOPAK BURNERS A/N 142262 469751	D59	C61	NOx: PROCESS UNIT	CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; NOx: 130 LB/MMSCF NATURAL GAS (1) [RULE 2012,12-7-1995; RULE 2012,4-9-1999; RULE 2012, 5-5-2005; RULE 2002, 1-7-2005] PM: 0.1 GRAINS / SCF (5)[RULE 409, 8-7-1981]	B27.1, C1.7, C6.2, D12.6, D323.2, E57.3, E71.1

Note: All the changes due to modification of the oven as shown in section H of the Reclaim/Title V facility permit are printed in **BOLD** in the above Table.

EMISSIONS AND REQUIREMENTS

Based on the proposed replacement of the two burners in the oven with one new burner, in addition to the existing rule attachments, the most recently revised and amended Rule attachments will also be indicated and included as follows:

RULE 2002, 1-7-2005: This Rule is added as a Requirement with respect to allocations for NOx emissions.

RULE 2012, 12-7-1995: This Rule is updated and replaced by the most recently amended date of 5-6-2005.....(see RULE 2012, 5-6-2005).

CONDITIONS

Based on the proposed replacement of the two burners in the oven with one new burner, additional conditions are imposed to ensure the operation of the oven with the new burner remains in compliance with all the relevant Reclaim/Title V facility Rule requirements.

These relevant conditions as included in the Reclaim/Title V facility permit are as follows:

B27.1 : THE OPERATOR SHALL NOT USE MATERIALS CONTAINING ANY TOXIC AIR CONTAMINANTS (TACs) IDENTIFIED IN THE SCAQMD RULE 1401, AS AMENDED 6/5/2009.



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- C1.7 :** THE OPERATOR SHALL LIMIT THE FUEL USAGE TO NO MORE THAN 7,550 CUBIC FEET IN ANY ONE DAY.
- D12.6 :** THE OPERATOR SHALL INSTALL AND MAINTAIN A(N) NON-RESETTABLE TOTALIZING FUEL FLOW METER TO ACCURATELY INDICATE THE FUEL USAGE IN THE CURING OVEN.
- THE OPERATOR SHALL ALSO INSTALL AND MAINTAIN A DEVICE TO CONTINUOUSLY RECORD THE PARAMETER BEING MEASURED.
- THE OPERATOR SHALL MAINTAIN ADEQUATE RECORDS TO VERIFY THE GAS USAGE ONCE A DAY. SUCH RECORDS SHALL BE KEPT ON THE PREMISES FOR AT LEAST TWO YEARS AND BE MADE AVAILABLE TO THE EXECUTIVE OFFICER OR HIS REPRESENTATIVE UPON REQUEST.
- E57.3 :** THE OPERATOR SHALL VENT THIS EQUIPMENT TO THE SCRUBBER SYSTEM WHENEVER IT IS IN OPERATION.
- E71.1 :** THE OPERATOR SHALL NOT DISCHARGE ANY VISIBLE EMISSIONS FROM THIS EQUIPMENT TO THE ATMOSPHERE.

EQUIPMENT DESCRIPTION

See Appendix 1(a) for the most recent and relevant *existing equipment description* within section D of the Reclaim / Title V facility permit, dated June 2, 2009, **before** inclusion of proposed Modification as described above in this application.

See Appendix 1(b) for relevant *modification of equipment description* within section H and the *existing equipment description* within section D of the Reclaim / Title V facility permit, dated November 18, 2009, **after** inclusion of proposed Modification as described above in this application.

EQUIPMENT (DEVICE) CONDITIONS

See Appendix 2(a) for the most recent and relevant *existing equipment specific conditions* within section D of the Reclaim / Title V facility permit, dated June 2, 2009, **before** inclusion of proposed Modification as described above in this application.

See Appendix 2(b) for relevant *New equipment specific conditions* within section H and the *existing equipment specific conditions* within section D of the Reclaim / Title V facility permit dated November 18, 2009, **after** inclusion of proposed Modification as described above in this application.



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BACKGROUND

Kirkhill - TA Company with facility ID 1744 is a NOx RECLAIM Cycle II facility which also belongs to the Title V program and is currently operating under a permit shield with respect to the renewal of its Title V facility permit status. The initial Title V for this facility was issued on May 9, 2000.

Kirkhill - TA is in the business of custom manufacture of rubber products such as rubber sheet, strip, rod and tube for aerospace industry, at its facility in Brea, California.

A/N 469752: Reclaim / Title V Permit Revision

This application was submitted in June 6, 2007 as a Reclaim / Title V Permit Revision application to include the proposed modification in the following application:

A/N 469751: Oven (Curing)

This application was submitted in June 6, 2007 as a Class I Modification application to include:

1. **Modification** of an existing rubber Curing Oven, with device No. D59, operating as part of Process 2 / System 5 within section D of the facility Permit to Operate. The facility operator has proposed to replace the two existing burners with a total fire capacity of 0.52 MMBtu/hr with one new burner which has been de-rated from a total fire capacity of 1.0 MMBtu/hr to have a fire capacity of 0.33 MMBtu/hr in this oven.

Currently there are no outstanding NC or NOV on file for this facility (see Appendix 3).

PROCESS DESCRIPTION

The purpose of the proposed modification of the curing oven (D59) to include the installation of two new burners to increase the oven efficiency while reducing fuel usage and NOx emissions. Therefore, based on the review by the facility operator, it is determined to achieve the best efficiency from this oven, the two existing burners should be replaced with one ImmersoPak burner, Model IP006. This burner has a maximum fire rating of 1 MMBtu/hr. However, due to modifications in the curing process, less heat is needed and therefore, the burner will be de-rated to 0.33 MMBtu/hr.

This oven is 22 ft. long, 12.0 ft. wide and 8.0 ft. high and operates with a minimum temperature of 250°F and a maximum temperature of 450°F. A 0.5 h.p exhaust fan and a 15 h.p circulation fan allow for the air exhaust and air recirculation and exchange inside this oven.

The proposed modification of the curing oven (D59) in A/N 469751 is a Minor Permit Revision and fulfills all the relevant criteria in Rule 300(b)(12).

As a minor permit revision, the proposed replacement of the burners is not subject to any Public Notice but would be subject to a 45 day EPA review.



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OPERATION SCHEDULE

Average: 24 hr/day, 7 day/wk, 52 wk/yr
Maximum: 24 hr/day, 7 day/wk, 52 wk/yr

EMISSION CALCULATION

A/N 469751:

The maximum NOx emission representing the proposed operation of this equipment is calculated as follows:

AEIS

NOx:

$$E = [C_d \times (20.9 / (20.9 - \%O_2)) \times CF \times FF] \text{-----(1)}$$

Where,

- E = NOx emission rate (lb/mmBtu)
- C_d = NOx concentration for oven = 100 ppm
- %O₂ = Standard concentration of oxygen = 3%
- CF = Conversion factor (NOx) = 1.194 x 10⁻⁷ lb/ppm-scf
- FF = Fuel factor = 8,710 scf/mmBtu

Therefore,

$$\begin{aligned}
 E &= [100 \times (20.9 / (20.9 - 3)) \times 1.194 \times 10^{-7} \times 8,710] \\
 &= [100 \times 1.167 \times 10,399.74 \times 10^{-7}] \\
 &= \mathbf{0.121 \text{ lb/mmBtu}}
 \end{aligned}$$

R = Burner fire rating = 0.33 mmBtu/hr

Therefore:

$$\begin{aligned}
 E &= 0.121 \text{ lb/mmBtu} \times 0.33 \text{ mmBtu/hr} \\
 &= \mathbf{0.0399 \text{ lb/hr}} \\
 &= 0.0399 \text{ lb/hr} \times 24 \text{ hr/day} \\
 &= \mathbf{0.9576 \text{ lb/day}}
 \end{aligned}$$

CO:

Using equation (1) above:

$$\begin{aligned}
 E &= [80 \times (20.9 / (20.9 - 3)) \times 7.27 \times 10^{-8} \times 8,710] \\
 &= [10 \times 1.167 \times 63,321.7 \times 10^{-8}] \\
 &= \mathbf{0.0592 \text{ lb/mmBtu}}
 \end{aligned}$$

R = Burner fire rating = 0.33 mmBtu/hr

Therefore:

$$E = 0.0592 \text{ lb/mmBtu} \times 0.33 \text{ mmBtu/hr}$$



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$$\begin{aligned}
&= 0.0195 \text{ lb/hr} \\
&= 0.0195 \text{ lb/hr} \times 24 \text{ hr/day} \\
&= \underline{0.469 \text{ lb/day}}
\end{aligned}$$

Where,

- E = CO emission rate (lb/mmBtu)
- C_d = CO concentration for the boiler = 80 ppm (see Appendix 4)
- %O₂ = Standard concentration of oxygen = 3%
- CF = Conversion factor (CO) = 7.27 x 10⁻⁸ lb/ppm-scf
- FF = Fuel factor = 8,710 scf/mmBtu

Emission Rates for PM10, ROG & SOx:

The emission rates for PM, SOx and ROG can be calculated using default Emission Factors (E_f) for "External Combustion Equipment – Other Equipment" as follows (see Appendix 5):

PM10 (=PM):

To calculate the amount of natural gas used by the curing oven when operating at its maximum de-rated fire capacity:

$$V = R / H \text{ ----- (2)}$$

Where,

- R = Maximum heat input of the oven (de-rated) = 0.33 mmBtu/hr
- H = Heat value of natural gas = 1050 Btu/scf
- V = Volume of natural gas used by oven

$$\begin{aligned}
V &= 0.33 \text{ (mmBtu/hr)} / 1050 \text{ (Btu/scf)} \\
&= 3.14 \times 10^{-4} \text{ mmscf/hr} \\
&= 314.29 \text{ scf/hr}
\end{aligned}$$

Therefore,

$$E = V \times E_f \times L \text{ ----- (3)}$$

Where,

- E = Emission rate
- V = Max. gas flow rate = 314.29 scf/hr
- E_f = Emission Factor = 7.6 lb./mmscf (see Appendix 5)
- L = Maximum operating load = 100%

Therefore,

$$\begin{aligned}
E &= \frac{314.29 \times 7.6 \times 100}{1,000,000 \times 100} \\
&= \underline{0.002 \text{ lb/hr}}
\end{aligned}$$

In addition to the PM10 emission from combustion of natural gas calculated above, the oven also produces some PM10 emissions due to curing process of rubber material. Since no change is being proposed in the

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quantity and method of processing of the rubber material, the previous emission value as indicated for A/N 142262 will be used towards calculating the TOTAL PM10 emissions. Therefore,

$$\begin{aligned}
 E_{\text{Total}} &= 0.002 \text{ lb/hr} + 0.046 \text{ lb/hr (as R2 (controlled emission) -see A/N 142262)} \\
 &= \mathbf{0.048 \text{ lb/hr}} \\
 &= 0.048 \text{ lb/hr} \times 24 \text{ hr/day} \\
 &= \mathbf{1.152 \text{ lb/day}}
 \end{aligned}$$

ROG:

Using equ. (3) above:

$$\begin{aligned}
 E &= \frac{314.29 \times 7.0 \times 100}{1,000,000 \times 100} \\
 &= \mathbf{0.002 \text{ lb/hr}} \\
 &= 0.002 \text{ lb/hr} \times 24 \text{ hr/day} \\
 &= \mathbf{0.048 \text{ lb/day}}
 \end{aligned}$$

Where,

Emission Factor = 7.0 lb/mmscf (see Appendix 5)

SOx:

Using equ. (3) above:

$$\begin{aligned}
 E &= \frac{314.29 \times 0.60 \times 100}{1,000,000 \times 100} \\
 &= \mathbf{0.0002 \text{ lb/hr}} \\
 &= 0.0002 \text{ lb/hr} \times 24 \text{ hr/day} \\
 &= \mathbf{0.0048 \text{ lb/day}}
 \end{aligned}$$

Where,

Emission Factor = 0.60 lb/mmscf (see Appendix 5)

A list of all the pollutant emissions from the operation of the proposed new burner only is summarized in Table 1 below:

Table 1 – Summary of Criteria Pollutant Emissions from Natural Gas Combustion in New Burner

Pollutant	MHU = MHC* (lb/hr)	MDU = MDC† (lb/day)
NOx	0.0399	0.958
CO	0.0195	0.469
PM10	0.002	0.048
ROG	0.002	0.048
SOx	0.0002	0.005

* MHU = Maximum hourly uncontrolled,

MHC = Maximum hourly controlled

† MDU = Maximum daily uncontrolled,

MDC = Maximum daily controlled

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RULE EVALUATION

⇒ **RULE 212, PUBLIC NOTIFICATION**

RULE 212(c)(1):

The modification of the existing oven (D59) is considered a Minor Permit Revision for this Reclaim / Title V facility and is therefore not subject to any public notification. Furthermore, although this facility is located within 1000 ft. of Brea Junior High School @ 400 N Brea Blvd., Brea (see Appendix 6), however, public notification is not required for the proposed modification which results in a reduction of air contaminants (as NOx) from the facility. Furthermore, no increase in the health risk assessment at any receptor locations is expected since the operation of the curing oven does not generate any Toxic Air Contaminant (TAC) per rule 1401 (see below).

Therefore, public notice is NOT required for the proposed modification.

RULE 212(c)(2):

Based on the calculated controlled emission values, an emission decrease is expected for NOx emissions from the modified curing oven. The emission values for all the criteria pollutants do not exceed any of the daily maximums specified in subdivision (g) of this rule. The pre-modification values are based on the existing NSR values for the current A/N 142262 for the oven. The post modification values are based on the emission values described in Table 1 above. The allowed maximum daily emission values are based on the values described in Rule 212(g). A summary of the relevant emission values are provided in Table 2 below. The results show that this facility is expected to be in compliance with this rule.

Table 2 - Comparison of Allowed, Pre- and Post- Modification Daily Emissions for the Proposed Modification of the Curing Oven (D59)

Air Contaminant	Maximum Daily Allowed (lb/day)	MDC (Pre-Modification* (lb/day)	MDC (Post-Modification (lb/day)	Compliance?
Volatile Organic Compounds	30	0.0	0.0	Yes
Nitrogen Oxides	40	3.0	1.0	Yes
PM (=PM10)	30	1.0	1.0	Yes
Sulfur Dioxide	60	0.0	0.0	Yes
Carbon Monoxide	220	0.0	0.0	Yes
Lead	3	N/A	N/A	N/A

MDC – Maximum Daily Controlled (Emission)

* See A/N 142262.

RULE 212(c)(3):

Based on processing of rubber material in the curing oven and the use of proposed new burners, no carcinogenic or toxic air contaminants are expected. Therefore, compliance with this rule is expected.

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⇒ RULE 401, VISIBLE EMISSIONS

The proposed modification of the curing oven by replacing the existing burners with new burners is not expected to create any visible emissions from this oven. Therefore, compliance with this rule is expected.

⇒ RULE 402, NUISANCE

The proposed modification of the curing oven by replacing the existing burners with new burners is not expected to create any nuisance issues from this oven. Therefore, compliance with this rule is expected.

⇒ RULE 404, PARTICULATE MATTER - CONCENTRATION

Based on the reduction in the maximum fire capacity of the new burners, a reduction in PM concentration is expected compliance with this rule is expected.

⇒ RULE 405, SOLID PARTICULATE MATTER – WEIGHT

Based on the current operation of the oven, no changes are expected in the PM/PM10 emission from The rubber curing process. Therefore, compliance with this rule is expected.

⇒ REGULATION XIII**RULE 1303 (a): Best Available Control Technology (BACT)**

BACT in the form of a wet particulate scrubber unit (C61) vents this oven. This scrubber acts to control any potential visible emissions as well as particulates from the curing rubber material from the oven. Compliance with this regulation is expected.

(b)(1), MODELING

Appendix A of this rule states: "If the emissions are less than the allowable emissions, no further analysis is required." As shown in Table 3 below, the maximum new hourly emissions are less than the current hourly emissions for NOx, CO and PM10. The ROG & SOx emissions are not subject to this rule. Therefore, no further analysis will be required.

Table 3 – Comparative Modeling Analysis for Emissions from the Existing and Modified Oven Vs. Allowable Emissions in Table A-1

Pollutant	Current Emission On NSR (lb/hr)	New Emission (lb/hr)	Allowable Emission (lb/hr)	Compliance?
NOx	0.106	0.0399	0.20	Yes
CO	0.002	0.0195	11.00	Yes
PM10	0.054	(0.046* + 0.002) = 0.048	1.20	Yes

* PM10 controlled emission rate due to rubber material being processed in the curing oven (see A/N 142262).

(b)(2), EMISSION OFFSETS

Emission offset evaluation for different criteria pollutants are determined based on the controlled (=uncontrolled) 30 Day Average (i.e. monthly) emissions for each criteria pollutant.

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NSR

30 day average emissions are as follows:

NOx:

$$\begin{aligned}\text{NOx} &= \frac{0.0399 \text{ lb/hr} \times 24 \text{ hr/day} \times 7 \text{ day/wk} \times 4.33 \text{ wk/mo.}}{30 \text{ day/mo.}} \\ &= 0.967 \text{ lb/day} \\ &= \underline{\underline{1.0 \text{ lb/day}}}\end{aligned}$$

CO:

$$\begin{aligned}\text{CO} &= \frac{0.0195 \text{ lb/hr} \times 24 \text{ hr/day} \times 7 \text{ day/wk} \times 4.33 \text{ wk/mo.}}{30 \text{ day/mo.}} \\ &= 0.473 \text{ lb/day} \\ &= \underline{\underline{0.0 \text{ lb/day}}}\end{aligned}$$

PM10:

$$\begin{aligned}\text{PM10} &= \frac{0.048 \text{ lb/hr} \times 24 \text{ hr/day} \times 7 \text{ day/wk} \times 4.33 \text{ wk/mo.}}{30 \text{ day/mo.}} \\ &= 1.164 \text{ lb/day} \\ &= \underline{\underline{1.0 \text{ lb/day}}}\end{aligned}$$

ROG:

$$\begin{aligned}\text{ROG} &= \frac{0.002 \text{ lb/hr} \times 24 \text{ hr/day} \times 7 \text{ day/wk} \times 4.33 \text{ wk/mo.}}{30 \text{ day/mo.}} \\ &= 0.048 \text{ lb/day} \\ &= \underline{\underline{0.0 \text{ lb/day}}}\end{aligned}$$

SOx:

$$\begin{aligned}\text{SOx} &= \frac{0.0002 \text{ lb/hr} \times 24 \text{ hr/day} \times 7 \text{ day/wk} \times 4.33 \text{ wk/mo.}}{30 \text{ day/mo.}} \\ &= 0.0048 \text{ lb/day} \\ &= \underline{\underline{0.0 \text{ lb/day}}}\end{aligned}$$

Table 4 below shows the Pre- and post modification emission of different criteria pollutants for this oven. Since there are no net emission increases for any of the pollutants, no offsets are required for the proposed modification.

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Table 4 – Pre- and Post Modification Potential To Emit (PTE) for Curing Oven (D59)

Pollutant	PTE Pre Modification*	PTE Post Modification	Emission Increase	Compliance?
	(lb/day)	(lb/day)	(lb/day)	
NOx	3.0	1.0	-2.0	Yes
CO	0.0	0.0	0.0	Yes
PM10	1.0	1.0	0.0	Yes
ROG	0.0	0.0	0.0	Yes
SOx	0.0	0.0	0.0	Yes

* See NSR for A/N 142262.

⇒ **RULE 1401****NEW SOURCE REVIEW OF CARCINOGENIC AIR CONTAMINANTS**

No toxic material or carcinogenic air contaminants are processed through the curing oven. Condition #B27.1 is included as a permit condition for this oven to ensure that no Toxic Air Contaminant (TACs) material is used in this equipment. Therefore, compliance with this rule is expected.

⇒ **RULE 3000 (b)(12)(A)****GENERAL**

The proposed modification does not require or change a case-by-case evaluation of reasonably available control technology (RACT) pursuant to Title I of the federal Clean Air Act; or maximum achievable control technology (MACT) pursuant to 40 CFR Part 63, Subpart B;

The proposed modification does not violate a regulatory requirement.

The proposed modification which modifies the existing process/system line within the Reclaim facility permit, does not require any significant change in monitoring terms or conditions in the permit.

The proposed modification does not require relaxation of any recordkeeping, or reporting requirement, or term, or condition in the permit.

The proposed modification does not establish or change a permit condition that the facility has assumed to avoid an applicable requirement.

This proposed modification is not an installation of a new permit unit subject to a New Source Performance Standard (NSPS) pursuant to 40 CFR Part 60, or a National Emission Standard for Hazardous Air Pollutants (NESHAP) pursuant to 40 CFR Part 61 or 40 CFR Part 63.



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The proposed modification is not a modification or reconstruction of an existing permit unit, resulting in new or additional NSPS requirements pursuant to 40 CFR Part 60, or new or additional NESHAP requirements pursuant to 40 CFR Part 61 or 40 CFR Part 63; or incorporates an existing general permit, as defined in subdivision (e) of Rule 3004, and its associated requirements, into another Title V permit.

RECOMMENDATION

Based on the emission calculation, an emission “decrease” is expected from the replacement of the two existing burners with a new lower rated burner. A Permit to Construct is recommended for the proposed modification of the curing oven (D59) as described in this application.

Based on the above evaluation, this revision is considered a Minor Permit Revision and therefore a public notice is not required. However, since a 45 day EPA review is required for this minor modification, a permit to construct shall be recommended upon completion of this period. Other Compliance with district rules and regulations is expected.

FACILITY PERMIT TO OPERATE KIRK HILL - TA COMPANY

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 2 : RUBBER PRODUCTS MANUFACTURE					
System 4 : RUBBER COATING SYSTEM					
SPRAY COATING OPERATION, WITH SPRAY BOOTH A/N: 173613	D50			PM: (9) [RULE 404,2-7-1986] ; ROG: (9) [RULE 1124,12-13-1996;RULE 1168,2-13-1998;RULE 1171,6-13-1997;RULE 1171,10-8-1999]	B59.2, C1.1, C6.1, D322.1, E175.1, H23.1, H23.6, K67.1, K67.6
System 5 : RUBBER CURING SYSTEM					
OVEN, CURING, ELECTRIC, DISPATCH, 224 KW A/N: 445544	D53	C129		PM: (9) [RULE 404,2-7-1986]	C1.2, D323.2
OVEN, CURING, ELECTRIC, YOUNG BROTHERS, 90 KVA A/N: 04330A	D54	C61			C1.3, D323.2
OVEN, CURING, NATURAL GAS, K. J. CALLAHAN, 0.6 MMBTU/HR A/N: 06581A	D55	C61	NOX: PROCESS UNIT**	CO: 2000 PPMV (5) [RULE 407,4-2-1982] ; NOX: 130 LBS/MMSCF NATURAL GAS (1) [RULE 2012,12-7-1995;RULE 2012,4-9-1999] PM: 0.1 GRAINS/SCF (5) [RULE 409,8-7-1981]	C1.3, D323.2
OVEN, CURING, ELECTRIC, GRIEVE- HENDRY, 40 KW A/N: 06582A	D56	C61			C1.3, D323.2

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

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



APPX. 1(a) - (cont.)

**FACILITY PERMIT TO OPERATE
KIRKHILL - TA COMPANY**

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 2 : RUBBER PRODUCTS MANUFACTURE					
OVEN, CURING, NO. 7, NATURAL GAS, MILMETCO, 0.5 MMBTU/HR A/N: 09767A	D57	C61	NOX: PROCESS UNIT**	CO: 2000 PPMV (5) [RULE 407,4-2-1982] ; NOX: 130 LBS/MMSCF NATURAL GAS (1) [RULE 2012,12-7-1995;RULE 2012,4-9-1999] PM: 0.1 GRAINS/SCF (5) [RULE 409,8-7-1981]	A63.1, D323.2
OVEN, CURING, NO. 8, NATURAL GAS, CALLAHAN, 0.6 MMBTU/HR A/N: 09766A	D58	C61	NOX: PROCESS UNIT**	CO: 2000 PPMV (5) [RULE 407,4-2-1982] ; NOX: 130 LBS/MMSCF NATURAL GAS (1) [RULE 2012,12-7-1995;RULE 2012,4-9-1999] PM: 0.1 GRAINS/SCF (5) [RULE 409,8-7-1981]	A63.2, D323.2
OVEN, CURING, NATURAL GAS, INDUCO, 0.52 MMBTU/HR A/N: 142262	D59	C61	NOX: PROCESS UNIT**	CO: 2000 PPMV (5) [RULE 407,4-2-1982] ; NOX: 130 LBS/MMSCF NATURAL GAS (1) [RULE 2012,12-7-1995;RULE 2012,4-9-1999] PM: 0.1 GRAINS/SCF (5) [RULE 409,8-7-1981]	C6.2, D323.2
SCRUBBER, WIDTH: 3 FT; HEIGHT: 8 FT 3 IN; LENGTH: 7 FT A/N: 09881A	C61	D54 D55 D56 D57 D58 D59 C62 D128			D12.3, K67.4

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

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

FACILITY PERMIT TO OPERATE KIRKHILL - TA COMPANY

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 2 : RUBBER PRODUCTS MANUFACTURE					
MIST ELIMINATOR A/N: 09881A	C62	C61 C63			
MIST ELIMINATOR A/N: 09881A	C63	C62 C64			
ELECTROSTATIC PRECIPITATOR, INDUSTRIAL SPECIALISTS, INC., MODEL SMOG HOG MS-6-2T A/N: 09881A	C64	C63		PM: (9) [RULE 404,2-7-1986]	D323.1, E202.1, K67.3
OVEN, CURING, ELECTRIC, BLUE M, 23.8 KW A/N: 118015	D65	C66			C6.3, D323.1
ELECTROSTATIC PRECIPITATOR, UNITED AIR SPECIALISTS, MODEL SH-20-P.E. A/N: 138768	C66	D65		PM: (9) [RULE 404,2-7-1986]	D323.1, E202.1, K67.3
ELECTROSTATIC PRECIPITATOR, UNITED AIR SPECIALISTS, MODEL SH-20-P.E. A/N: 138769	C67	D68		PM: (9) [RULE 404,2-7-1986]	D323.1, E202.1, K67.3
OVEN, ELECTRIC, BLUE M, RUBBER CURING, 13.75 KVA A/N: 138769	D68	C67			D323.1
ELECTROSTATIC PRECIPITATOR, UNITED AIR SPECIALISTS, MODEL SH-20-P.E. A/N: 145364	C69	D70 D95 D96 D97		PM: (9) [RULE 404,2-7-1986]	D323.1, E202.1, K67.3
OVEN, CURING, ELECTRIC, RUBBER CURING, 28 KW A/N: 145364	D70	C69			D323.1

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

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



APPX. 1(a) - (cont.)

**FACILITY PERMIT TO OPERATE
KIRKHILL - TA COMPANY**

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 2 : RUBBER PRODUCTS MANUFACTURE					
PRESS, NO. 1, SPONGE RUBBER CURING, STEAM HEATED A/N: 202578	D71				
PRESS, NO. 2, SPONGE RUBBER CURING, STEAM HEATED A/N: 202577	D72				
PRESS, NO. 77, SPONGE RUBBER CURING, STEAM HEATED A/N: 202564	D73				
PRESS, NO. 88, SPONGE RUBBER CURING, STEAM HEATED A/N: 202561	D74				
PRESS, NO. 96, SPONGE RUBBER CURING, STEAM HEATED A/N: 202563	D75				
PRESS, NO. 98, SPONGE RUBBER CURING, STEAM HEATED A/N: 202562	D76				
PRESS, NO. 106, SPONGE RUBBER CURING, STEAM HEATED A/N: 202579	D77				
PRESS, NO. 34, MECHANICAL SPONGE RUBBER CURING, STEAM HEATED A/N: 202581	D78				
PRESS, NO. 35, MECHANICAL SPONGE RUBBER CURING, STEAM HEATED A/N: 202582	D79				

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

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

FACILITY PERMIT TO OPERATE KIRKHILL - TA COMPANY

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 2 : RUBBER PRODUCTS MANUFACTURE					
PRESS, NO. 36, MECHANICAL SPONGE RUBBER CURING, STEAM HEATED A/N: 202584	D80				
PRESS, NO. 52, MECHANICAL SPONGE RUBBER CURING, STEAM HEATED A/N: 202589	D81				
PRESS, NO. 53, MECHANICAL SPONGE RUBBER CURING, STEAM HEATED A/N: 202590	D82				
PRESS, NO. 97, MECHANICAL SPONGE RUBBER CURING, STEAM HEATED A/N: 202591	D83				
PRESS, NO. 99, MECHANICAL SPONGE RUBBER CURING, STEAM HEATED A/N: 202593	D84				
PRESS, NO. SP11, MECHANICAL SPONGE RUBBER CURING, STEAM HEATED A/N: 202594	D85				
PRESS, NO. 109, MECHANICAL SPONGE RUBBER CURING, STEAM HEATED A/N: 202595	D86				

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

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

APPX. 1(a) - (cont.)

**FACILITY PERMIT TO OPERATE
KIRKHILL - TA COMPANY**

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 2 : RUBBER PRODUCTS MANUFACTURE					
PRESS, NO. SP19, SPONGE RUBBER CURING, STEAM HEATED A/N: 202596	D87				
PRESS, NO. SP20, SPONGE RUBBER CURING, STEAM HEATED A/N: 202599	D88				
PRESS, NO. 104, SPONGE RUBBER CURING, STEAM HEATED A/N: 202600	D89				
OVEN, CURING, ELECTRIC, 18 KW A/N: 145364	D95	C69			D323.1
OVEN, CURING, ELECTRIC, 11.5 KW A/N: 145364	D96	C69			D323.1
OVEN, CURING, ELECTRIC, 1 KW A/N: 145364	D97	C69			D323.1
PRESS, NO. SP23, SPONGE RUBBER CURING, STEAM HEATED A/N: 202602	D99				
OVEN, CURING, DESPATCH, ELECTRIC, MODEL PSC3-24, SERIAL NO. 11109, 51KW. A/N: 436876	D128	C61			C1.3, D323.2
ELECTROSTATIC PRECIPITATOR, , UNITED AIR SPECIALISTS, SMOG-HOG, MODEL SH-40-PE-S A/N: 432258	C129	D53		PM: (9) [RULE 404,10-5-1979]	D322.2, D323.1, E202.1, K67.5

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

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



APPENDIX 2(a)

**FACILITY PERMIT TO OPERATE
KIRKHILL - TA COMPANY**

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

B59.2 The operator shall not use the following material(s) in this device :

photochemically reactive organic solvents and/or coatings containing photochemically reactive organic solvents

[RULE 442, 12-15-2000]

[Devices subject to this condition : D50]

C. Throughput or Operating Parameter Limits

C1.1 The operator shall limit the coating and solvent usage to no more than 8.4 gallon(s) per day.

This includes no more than 50 hours in any one year for maintenance and testing.

[RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D50]

C1.2 The operator shall limit the material processed to no more than 4800 lb(s) in any one day.

For the purpose of this condition, material processed shall be defined as total quantity of all materials processed in this oven.

[RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D53]

FACILITY PERMIT TO OPERATE KIRKHILL - TA COMPANY

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

C1.3 The operator shall limit the material processed to no more than 4000 lb(s) in any one day.

For the purpose of this condition, material processed shall be defined as total quantity of rubber processed in this equipment.

[RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D54, D55, D56, D128]

C6.1 The operator shall use this equipment in such a manner that the differential pressure being monitored, as indicated below, does not exceed 0.25 inches water column.

To comply with this condition, the operator shall install and maintain a(n) differential pressure gauge to accurately indicate the differential pressure across the filter.

[RULE 1303(a)(1)-BACT, 12-6-2002; RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : D50]

C6.2 The operator shall use this equipment in such a manner that the temperature being monitored, as indicated below, does not exceed 450 Deg F.

The operator shall automatically regulate the temperature by a fully modulated control system.

To comply with this condition, the operator shall install and maintain a(n) temperature gauge to accurately indicate the temperature of the oven.

[RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition : D59]

APPX. 2(a) - (cont.)

**FACILITY PERMIT TO OPERATE
KIRK HILL - TA COMPANY**

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

D323.1 The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on a semi-annual basis, at least, unless the equipment did not operate during the entire semi-annual period. The routine semi-annual inspection shall be conducted while the equipment is in operation and during daylight hours.

If any visible emissions (not including condensed water vapor) are detected that last more than three minutes in any one hour, the operator shall verify and certify within 24 hours that the equipment causing the emission and any associated air pollution control equipment are operating normally according to their design and standard procedures and under the same conditions under which compliance was achieved in the past, and either:

- 1). Take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit; or
- 2). Have a CARB-certified smoke reader determine compliance with the opacity standard, using EPA Method 9 or the procedures in the CARB manual "Visible Emission Evaluation", within three business days and report any deviations to AQMD.

The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

- 1). Stack or emission point identification;
- 2). Description of any corrective actions taken to abate visible emissions;
- 3). Date and time visible emission was abated; and
- 4). All visible emission observation records by operator or a certified smoke reader.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : C35, D36, C64, D65, C66, C67, D68, C69, D70, D95, D96, D97, E108, C129]

FACILITY PERMIT TO OPERATE KIRKHILL - TA COMPANY

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

D323.2 The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on an annual basis, at least, unless the equipment did not operate during the entire annual period. The routine annual inspection shall be conducted while the equipment is in operation and during daylight hours.

If any visible emissions (not including condensed water vapor) are detected that last more than three minutes in any one hour, the operator shall verify and certify within 24 hours that the equipment causing the emission and any associated air pollution control equipment are operating normally according to their design and standard procedures and under the same conditions under which compliance was achieved in the past, and either:

- 1). Take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit; or
- 2). Have a CARB-certified smoke reader determine compliance with the opacity standard, using EPA Method 9 or the procedures in the CARB manual "Visible Emission Evaluation", within three business days and report any deviations to AQMD.

The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

- 1). Stack or emission point identification;
- 2). Description of any corrective actions taken to abate visible emissions;
- 3). Date and time visible emission was abated; and
- 4). All visible emission observation records by operator or a certified smoke reader.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : D3, D4, D5, D6, D11, D12, D13, D14, D15, D16, D17, D18, D19, D20, D21, D23, D25, D27, D32, D33, D34, D37, D38, D39, D40, D41, D42, D43, C44, C45, D53, D54, D55, D56, D57, D58, D59, C124, D126, C127, D128]

FACILITY PERMIT TO OPERATE KIRKHILL - TA COMPANY

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 2 : RUBBER PRODUCTS MANUFACTURE					
OVEN, CURING, NO. 7, NATURAL GAS, MILMETCO, 0.5 MMBTU/HR A/N: 09767A	D57	C61	NOX: PROCESS UNIT**	CO: 2000 PPMV (5) [RULE 407,4-2-1982] ; NOX: 130 LBS/MMSCF NATURAL GAS (1) [RULE 2012,12-7-1995;RULE 2012,4-9-1999] PM: 0.1 GRAINS/SCF (5) [RULE 409,8-7-1981]	A63.1, D323.2
OVEN, CURING, NO. 8, NATURAL GAS, CALLAHAN, 0.6 MMBTU/HR A/N: 09766A	D58	C61	NOX: PROCESS UNIT**	CO: 2000 PPMV (5) [RULE 407,4-2-1982] ; NOX: 130 LBS/MMSCF NATURAL GAS (1) [RULE 2012,12-7-1995;RULE 2012,4-9-1999] PM: 0.1 GRAINS/SCF (5) [RULE 409,8-7-1981]	A63.2, D323.2
OVEN, CURING, NATURAL GAS, INDUCO, 0.52 MMBTU/HR A/N:	D59	C61	NOX: PROCESS UNIT**	CO: 2000 PPMV (5) [RULE 407,4-2-1982] ; NOX: 130 LBS/MMSCF NATURAL GAS (1) [RULE 2012,12-7-1995;RULE 2012,4-9-1999] PM: 0.1 GRAINS/SCF (5) [RULE 409,8-7-1981]	C6.2, D323.2
SCRUBBER, WIDTH: 3 FT; HEIGHT: 8 FT 3 IN; LENGTH: 7 FT A/N: 09881A	C61	D54 D55 D56 D57 D58 D59 C62 D128			D12.3, K67.4

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

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

APPENDIX 1(b) (Cont.)

FACILITY PERMIT TO OPERATE KIRKHILL - TA COMPANY

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 2 : RUBBER PRODUCTS MANUFACTURE					
System 5 : RUBBER CURING SYSTEM					
OVEN, CURING, NATURAL GAS, IMMERSOPAK BURNER, 0.33 MMBTU/HR A/N:	D59	C61	NOX: PROCESS UNIT**	CO: 2000 PPMV (5) [RULE 407,4-2-1982] ; NOX: 130 LBS/MMSCF NATURAL GAS (1) [RULE 2012,12-7-1995;RULE 2012,4-9-1999;RULE 2012,5-6- 2005] NOX: NATURAL GAS (2A) [RULE 2002,1-7-2005] ; PM: 0.1 GRAINS/SCF (5) [RULE 409,8-7-1981]	B27.1, C1.7, C6.2, D12.6, D323.2, E57.3, E71.1

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

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

FACILITY PERMIT TO OPERATE KIRKHILL - TA COMPANY

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

C1.3 The operator shall limit the material processed to no more than 4000 lb(s) in any one day.

For the purpose of this condition, material processed shall be defined as total quantity of rubber processed in this equipment.

[RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D54, D55, D56, D128]

C6.1 The operator shall use this equipment in such a manner that the differential pressure being monitored, as indicated below, does not exceed 0.25 inches water column.

To comply with this condition, the operator shall install and maintain a(n) differential pressure gauge to accurately indicate the differential pressure across the filter.

[RULE 1303(a)(1)-BACT, 12-6-2002; **RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997**]

[Devices subject to this condition : D50]

C6.2 The operator shall use this equipment in such a manner that the temperature being monitored, as indicated below, does not exceed 450 Deg F.

The operator shall automatically regulate the temperature by a fully modulated control system.

To comply with this condition, the operator shall install and maintain a(n) temperature gauge to accurately indicate the temperature of the oven.

[RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition : D59]

FACILITY PERMIT TO OPERATE KIRKHILL - TA COMPANY

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

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

D323.2 The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on an annual basis, at least, unless the equipment did not operate during the entire annual period. The routine annual inspection shall be conducted while the equipment is in operation and during daylight hours.

If any visible emissions (not including condensed water vapor) are detected that last more than three minutes in any one hour, the operator shall verify and certify within 24 hours that the equipment causing the emission and any associated air pollution control equipment are operating normally according to their design and standard procedures and under the same conditions under which compliance was achieved in the past, and either:

- 1). Take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit; or
- 2). Have a CARB-certified smoke reader determine compliance with the opacity standard, using EPA Method 9 or the procedures in the CARB manual "Visible Emission Evaluation", within three business days and report any deviations to AQMD.

The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

- 1). Stack or emission point identification;
- 2). Description of any corrective actions taken to abate visible emissions;
- 3). Date and time visible emission was abated; and
- 4). All visible emission observation records by operator or a certified smoke reader.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : D3, D4, D5, D6, D11, D12, D13, D14, D15, D16, D17, D18, D19, D20, D21, D23, D25, D27, D32, D33, D34, D37, D38, D39, D40, D41, D42, D43, C44, C45, D53, D54, D55, D56, D57, D58, D59, C124, D126, C127, D128]

**FACILITY PERMIT TO OPERATE
KIRKHILL - TA COMPANY**

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

DEVICE CONDITIONS

B. Material/Fuel Type Limits

B27.1 The operator shall not use materials containing any toxic air contaminants (TACs) identified in the SCAQMD Rule 1401, as amended 06/05/2009.

[Devices subject to this condition : D59]

C. Throughput or Operating Parameter Limits

C1.5 The operator shall limit the material processed to no more than 20,000 lb(s) in any one day.

The operator shall maintain adequate records to verify compliance with this condition. Such records shall be kept on the premises for at least two years and be made available to the executive officer or his representative upon request.

Materials processed in this equipment shall not contain any compounds identified as carcinogenic or toxic air contaminants in Rule 1401, as amended March 4, 2005.

[RULE 404, 2-7-1986; RULE 405, 2-7-1986]

[Devices subject to this condition : D130]

C1.6 The operator shall limit the material processed to no more than 168,000 lb(s) in any one month.

The operator shall maintain adequate records to verify compliance with this condition. Such records shall be kept on the premises for at least two years and be made available to the executive officer or his representative upon request.

[RULE 404, 2-7-1986; RULE 405, 2-7-1986]

[Devices subject to this condition : D130]

FACILITY PERMIT TO OPERATE KIRKHILL - TA COMPANY

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

C1.7 The operator shall limit the fuel usage to no more than 7,550 cubic feet in any one day.

[Devices subject to this condition : D59]

C6.2 The operator shall use this equipment in such a manner that the temperature being monitored, as indicated below, does not exceed 450 Deg F.

The operator shall automatically regulate the temperature by a fully modulated control system.

To comply with this condition, the operator shall install and maintain a(n) temperature gauge to accurately indicate the temperature of the oven.

[RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition : D59]

D. Monitoring/Testing Requirements

D12.5 The operator shall install and maintain a(n) differential pressure gauge to accurately indicate the differential pressure across the filter.

The pressure drop across the filter shall not exceed 3 inches of water column.

[RULE 1303(a)(1)-BACT, 5-10-1996]

[Devices subject to this condition : C136]

**FACILITY PERMIT TO OPERATE
KIRKHILL - TA COMPANY**

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

D12.6 The operator shall install and maintain a(n) non-resettable totalizing fuel flow meter to accurately indicate the fuel usage in the curing oven.

The operator shall also install and maintain a device to continuously record the parameter being measured.

The operator shall maintain adequate records to verify the gas usage once a day. Such records shall be kept on the premises for at least two years and be made available to the executive officer or his representative upon request.

[Devices subject to this condition : D59]

D322.2 The operator shall perform annual inspection of the equipment and filter media for leaks, broken or torn filter media, and improperly installed filter media.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : C136]

FACILITY PERMIT TO OPERATE KIRKHILL - TA COMPANY

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

D323.2 The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on an annual basis, at least, unless the equipment did not operate during the entire annual period. The routine annual inspection shall be conducted while the equipment is in operation and during daylight hours.

If any visible emissions (not including condensed water vapor) are detected that last more than three minutes in any one hour, the operator shall verify and certify within 24 hours that the equipment causing the emission and any associated air pollution control equipment are operating normally according to their design and standard procedures and under the same conditions under which compliance was achieved in the past, and either:

- 1). Take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit; or
- 2). Have a CARB-certified smoke reader determine compliance with the opacity standard, using EPA Method 9 or the procedures in the CARB manual "Visible Emission Evaluation", within three business days and report any deviations to AQMD.

The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

- 1). Stack or emission point identification;
- 2). Description of any corrective actions taken to abate visible emissions;
- 3). Date and time visible emission was abated; and
- 4). All visible emission observation records by operator or a certified smoke reader.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : D59, D130, D131, D132, D133, D134]

**FACILITY PERMIT TO OPERATE
KIRKHILL - TA COMPANY**

SECTION H: PERMIT TO CONSTRUCT AND TEMPORARY PERMIT TO OPERATE

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

E57.3 The operator shall vent this equipment to the scrubber system whenever it is in operation.

[Devices subject to this condition : D59]

E71.1 The operator shall not discharge any visible emissions from this equipment to the atmosphere.

[40CFR 61 Subpart M, 7-20-2004]

[Devices subject to this condition : D59, C136]

E102.1 The operator shall discharge dust collected in this equipment only into closed containers.

[RULE 1303(a)(1)-BACT, 12-6-2002; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : C136]

K. Record Keeping/Reporting

K67.5 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

The name of the person performing the inspection and/or maintenance of the filter media

The date, time and results of the inspection

The date, time and description of any maintenance or repairs resulting from the inspection

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : C136]

South Coast Air Quality Management District

NOV / NC Report

Notice No.	Type	Issued Date	Violation Date	Insp Id	Team	Facility Id	Facility Name	Final Action	Date	Asgmt No	Follow-up Status	Follow-up Number	Inspector	Date	Violation Description
D14108	NC	05/07/08	05/07/08	JN01		1744	KIRKHILL RUBBER CO	CLO	05/13/08	1046602	INCOMP		JN01	05/09/08	(1) Provide gas bill copie
D14137	NC	09/22/09	09/22/09	JN01		1744	KIRKHILL - TA COMPANY	CLO	10/06/09	1129911	INCOMP		JN01	10/06/09	Apply Missing Data to D

Total: 2

APPENDIX 3

APPENDIX 4

Kambiz Hadjforoosh

From: Glenn Stevens [gstevens@kirkhill-ta.com]
Sent: Tuesday, November 10, 2009 11:01 AM
To: Kambiz Hadjforoosh
Subject: FW: Eclipse Emission

Kambiz,

I was looking through some old emails. Below are the emissions from the manufacturer.

Glenn Stevens
 EHS Officer

Esterline | Engineered Materials
 300 East Cypress Street
 Brea, CA 92821
 Tel: (714) 529-4901, Ext. 5512
 Fax: (714) 529-6775
www.esterline.com

Featuring DARCHEM, KIRKHILL-TA, and NMC AEROSPACE Products

Click [here](#) to read disclaimer

From: Matthew Bowman [mailto:matthewb@srbboilers.com]
Sent: Monday, January 07, 2008 3:06 PM
To: Glenn Stevens
Subject: FW: Eclipse Emission

Matthew Bowman
S.R. & B. Boilers, Inc.
matthewb@srbboilers.com
 714.713.7249 cell
 714.632.1193 office
 714.632.1195 fax

From: burnbiz@aol.com [mailto:burnbiz@aol.com]
Sent: Monday, January 07, 2008 12:30 PM
To: Matthew Bowman
Subject: Eclipse Emission

Hello Matt,

Following up our conversation about the emissions of the Eclipse Immerso-Pak (IP) burners. Operating on natural gas, firing into either an immersion tube or a radiant tube, estimated **Nox is 100ppm and CO is 80ppm** (both at 3% O2). This is considered BACT for this application and your firing parameters. The burner size may also allow to fall under the less than 11b total emission per day requirement.

I hope this information is helpful. Please let me know if I may be of any further assistance.

Sincerely,

Jeff Dorfner

Wirth Gas Equipment (Eclipse Rep.)

More new features than ever. Check out the new [AOL Mail!](#)

11/12/2009

APPENDIX A - DEFAULT EMISSION FACTORS FOR COMBUSTION EQUIPMENT (CRITERIA AND TOXICS)

Table 1

Default Emission Factors for External Combustion Equipment for Forms B1 and B1U (for all sizes)

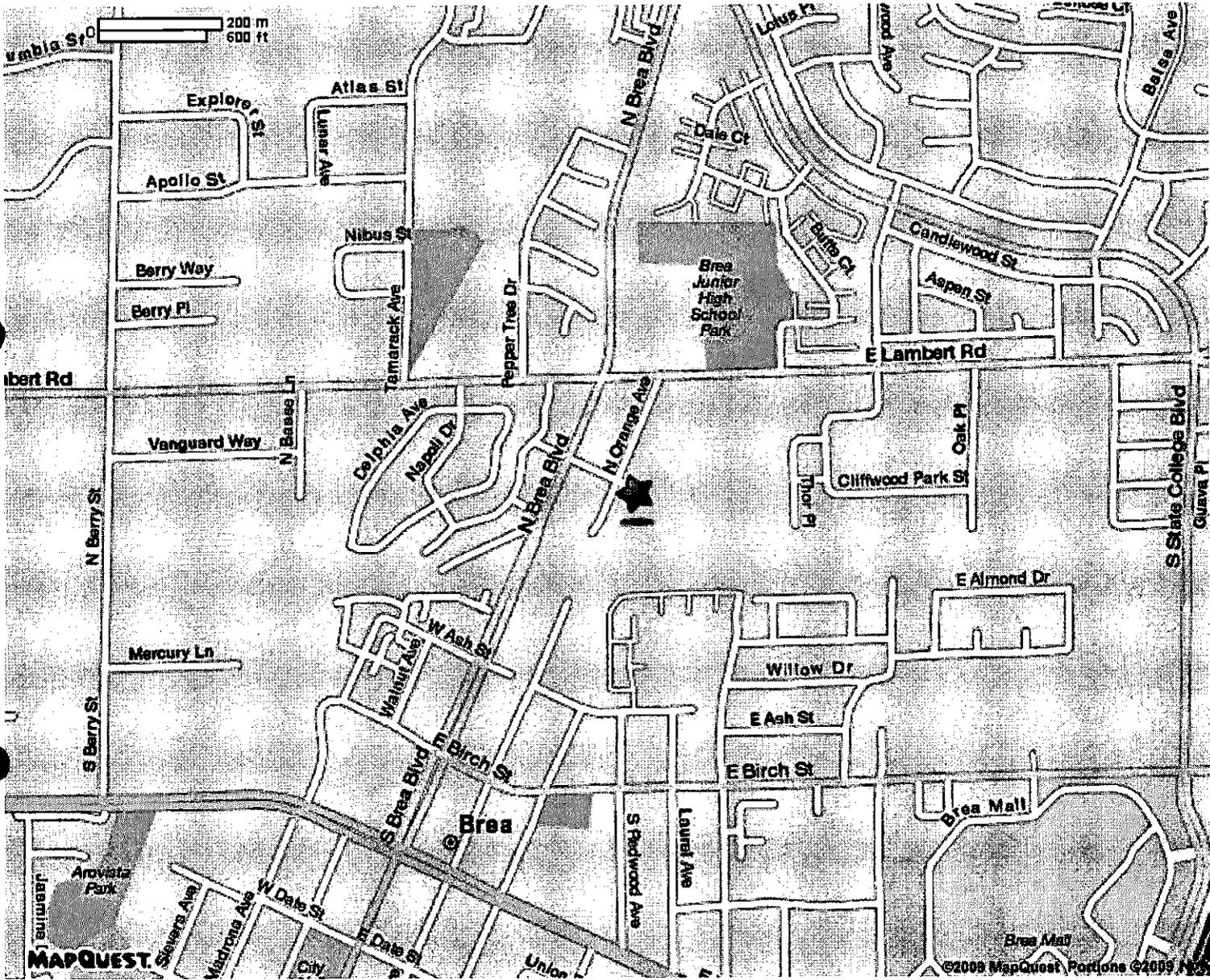
Fuel Type (fuel unit)	Organic Gases (lb/unit)	Methane (lb/unit)	Nitrogen Oxides (lb/unit)	Sulfur Oxides (lb/unit)	Carbon Monoxide (lb/unit)	Particulate Matter (lb/unit)
Natural Gas (mmscf) / Boilers Only	5.50	2.30	100.00	0.60	84.00	7.60
Natural Gas (mmscf) / Other Equipment	7.00	2.30	130.00	0.60	35.00	7.50
LPG, Propane, Butane (1000 gal.)	0.26	0.28	12.80	4.60	3.20	0.28
Diesel/Distillate Oil (1000 gal.)	1.32	0.05	20.00	7.10	5.00	2.00



Sorry! When printing directly from the browser your directions or map may not print correctly. For best results, try clicking the Printer-Friendly button.

★ Kirkhill-ta Co Edit
300 E Cypress St
Brea, CA 92821
(714) 529-4901

APPENDIX 6

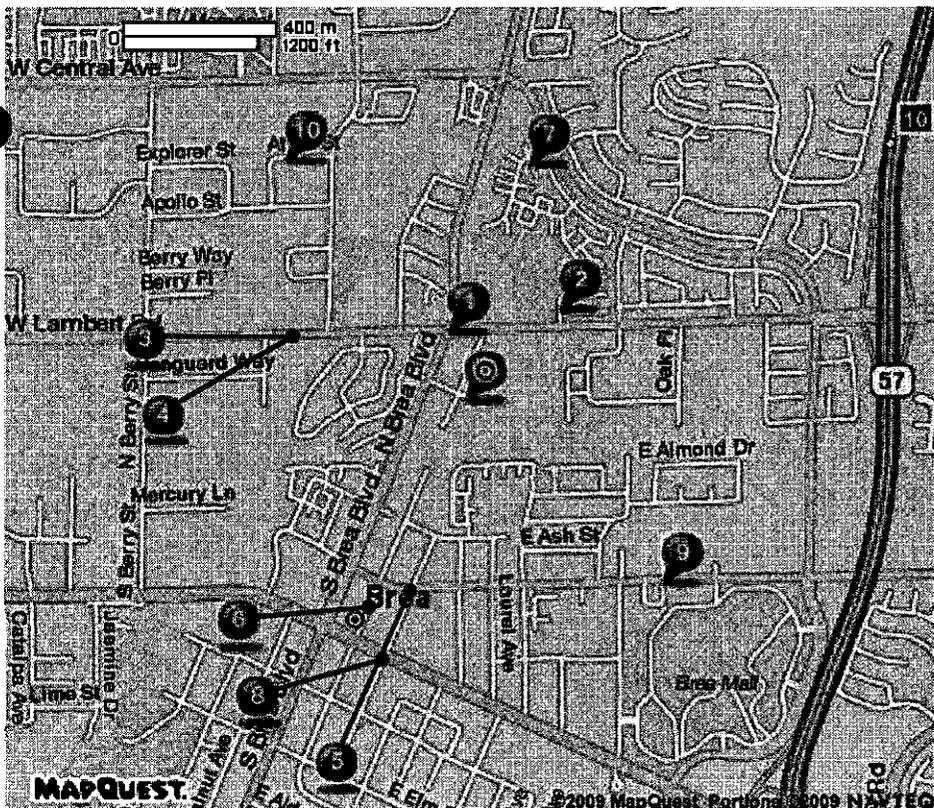


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- 1 **Brea Junior High School** - 0.14 miles away
400 N Brea Blvd, Brea, CA
| 714-990-7500
- 2 **Brea Junior High School Park**
- 0.26 miles away
Country Ln, Brea, CA
- 3 **Optimus Language School**
- 0.38 miles away
451 W Lambert Rd, Brea, CA
714-990-4657
- 4 **Fusion Learning Institute** - 0.38 miles away
451 W Lambert Rd # 203, Brea, CA
714-671-9080
- 5 **Laurel Elementary School**
- 0.39 miles away
200 S Flower Ave, Brea, CA
| 714-529-2520
- 6 **First USA Driving School** - 0.45 miles away
238 S Orange Ave, Brea, CA
714-990-3748
- 7 **Top Flight Accelerated Ground**
- 0.48 miles away
165 Panorama Ct, Brea, CA
714-273-2932
- 8 **Pilgrim Christian Pre-School**
- 0.53 miles away
300 E Imperial Hwy, Brea, CA
| 714-529-5254
- 9 **Brea-Olinda Unified School**
- 0.54 miles away
1 Civic Center Cir, Brea, CA
| 714-990-7800
- 10 **Ballard & Tighe Inc** - 0.6 miles away
471 Atlas St, Brea, CA
| 714-257-7324



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