



**SOUTH COAST AIR QUALITY MANAGEMENT  
DISTRICT**

**ENGINEERING & COMPLIANCE**

**APPLICATION PROCESSING AND CALCULATIONS**

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**PERMIT TO CONSTRUCT EVALUATION FOR  
NEW RTO & MODIFY FILM CLEANING & FILM PRINTING MACHINES**

**Facility ID:** 009668

**Legal Owner or Operator:** DELUXE LABORATORIES INC.

**Mailing Address:** 1377 N. SERRANO AVE.  
HOLLYWOOD, CA 90027-5623

**Equipment  
Location:** SAME AS ABOVE

**Equipment Description:**

**A/N 481186**

Title V "De Minimis Significant Permit Revision" Plan – 1<sup>st</sup> Revision

**A/N 481187 PC**

AIR POLLUTION CONTROL SYSTEM CONSISTING OF:

1. REGENERATIVE THERMAL OXIDIZER (RTO), ADWEST TECHNOLOGIES, MODEL RETOX2.0 RTO95, WITH ONE 578,000 BTU PER HOUR START-UP BURNER, MAXON KINEMAX 1-1/2 G AND A NATURAL GAS INJECTION SYSTEM.
2. EXHAUST SYSTEM WITH 10 H.P. BLOWER VENTING EIGHT FILM CLEANERS, TWO WET GATE FILM PRINTERS AND ONE SCRAP CABINET.

**A/N 481189 PC (modification to A/N 459611, PO F84248)**

MODIFICATION OF THE FILM-CLEANING MACHINE (PO F84248) CONSISTING OF:

FILM CLEANER, RANK INC., PS MACHINE, SPRAY-TYPE, MODEL SOLVIT, WITH AN ELECTRIC AIR HEATER AND A COMMON SOLVENT RECOVERY STILL

BY THE ADDITION OF A DUCTING SYSTEM TO VENT THE FILM CLEANING MACHINE TO THE NEW RTO.



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**A/N 481190** PC (modification to A/N 459612, PO F84256)

MODIFICATION OF THE FILM-CLEANING MACHINE (PO F84256) CONSISTING OF:

FILM CLEANER, RANK INC., PS MACHINE, SPRAY-TYPE, MODEL SOLVIT, WITH AN ELECTRIC AIR HEATER AND A COMMON SOLVENT RECOVERY STILL.

BY THE ADDITION OF A DUCTING SYSTEM TO VENT THE FILM CLEANING MACHINE TO THE NEW RTO.

**A/N 481191** PC (modification to A/N 459613, PO F84257)

MODIFICATION OF THE FILM-CLEANING MACHINE (PO F84257) CONSISTING OF:

FILM CLEANER, RANK INC., PS MACHINE, SPRAY-TYPE, MODEL SOLVIT, WITH AN ELECTRIC AIR HEATER AND A COMMON SOLVENT RECOVERY STILL

BY THE ADDITION OF A DUCTING SYSTEM TO VENT THE FILM CLEANING MACHINE TO THE NEW RTO.

**A/N 481192** PC (modification to A/N 459614, PO F84258)

MODIFICATION OF THE FILM-CLEANING MACHINE (PO F84258) CONSISTING OF:

FILM CLEANER, RANK INC., PS MACHINE, SPRAY-TYPE, MODEL SOLVIT, WITH AN ELECTRIC AIR HEATER AND A COMMON SOLVENT RECOVERY STILL

BY THE ADDITION OF A DUCTING SYSTEM TO VENT THE FILM CLEANING MACHINE TO THE NEW RTO.

**A/N 481193** PC (modification to A/N 459615, PO F84261)

MODIFICATION OF THE FILM-CLEANING MACHINE (PO F84261) CONSISTING OF:

FILM CLEANER, RANK INC., PS MACHINE, SPRAY-TYPE, MODEL SOLVIT, WITH AN ELECTRIC AIR HEATER AND A COMMON SOLVENT RECOVERY STILL

BY THE ADDITION OF A DUCTING SYSTEM TO VENT THE FILM CLEANING MACHINE TO THE NEW RTO.

**A/N 481194** PC (modification to A/N 459616, PO F84262)

MODIFICATION OF THE FILM-CLEANING MACHINE (PO F84263) CONSISTING OF:

FILM CLEANER, RANK INC., PS MACHINE, SPRAY-TYPE, MODEL SOLVIT, WITH AN ELECTRIC AIR HEATER AND A COMMON SOLVENT RECOVERY STILL

BY THE ADDITION OF A DUCTING SYSTEM TO VENT THE FILM CLEANING MACHINE TO THE NEW RTO.



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**A/N 481195** PC (modification to A/N 459617, PO F84274)

MODIFICATION OF THE FILM-CLEANING MACHINE (PO F84263) CONSISTING OF:  
FILM CLEANER, RANK INC., PS MACHINE, SPRAY-TYPE, MODEL SOLVIT, WITH AN  
ELECTRIC AIR HEATER AND A COMMON SOLVENT RECOVERY STILL

BY THE ADDITION OF A DUCTING SYSTEM TO VENT THE FILM CLEANING MACHINE TO  
THE NEW RTO.

**A/N 481196** PC (modification to A/N 459630, PO F84263)

MODIFICATION OF THE FILM-CLEANING MACHINE (PO F84263) CONSISTING OF:  
FILM CLEANER, RANK INC., PS MACHINE, SPRAY-TYPE, MODEL SOLVIT, WITH AN  
ELECTRIC AIR HEATER AND A COMMON SOLVENT RECOVERY STILL

BY THE ADDITION OF A DUCTING SYSTEM TO VENT THE FILM CLEANING MACHINE TO  
THE NEW RTO.

**A/N 481197** PC (modification to A/N 406439, PO F56679)

MODIFICATION OF THE WET-GATE FILM-PRINTING MACHINE NO. 13 (PO F56679)  
CONSISTING OF:

WET-GATE FILM PRINTER, OPTICAL TYPE, CUSTOM MADE, 1'-6" W. X 8'-6" L. X 8'-6" H.,  
WITH ONE ELECTRIC AIR HEATER, TWO 1/3 HP EXHAUST BLOWERS, AND ONE 1/3 HP  
SOLVENT PUMP.

BY THE ADDITION OF A DUCTING SYSTEM TO VENT THE WET-GATE FILM PRINTING  
MACHINE TO THE NEW RTO.

**A/N 481198** PC (modification to A/N 406442, PO F56678)

MODIFICATION OF THE WET-GATE FILM-PRINTING MACHINE NO. 14 (PO F56678)  
CONSISTING OF:

WET-GATE FILM PRINTER, OPTICAL TYPE, CUSTOM MADE, 1'-6" W. X 8'-6" L. X 8'-6" H.,  
WITH ONE ELECTRICAL AIR HEATER, TWO 1/3 HP EXHAUST BLOWERS, AND ONE 1/3 HP  
SOLVENT PUMP.

BY THE ADDITION OF A DUCTING SYSTEM TO VENT THE WET-GATE FILM PRINTING  
MACHINE TO THE NEW RTO.



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**HISTORY:**

On 4/8/2008 Deluxe Laboratories submitted twelve (12) applications as Class I for Permits to Construct and Operate the equipment described above. The applicant was exceeding the existing VOC emission limit on the film cleaning and printing machines and was not able to comply with the existing VOC cap indicated below, therefore, the company is under a Stipulated Order of Abatement #5654-1 until April 30, 2009 (document attached).

The applicant is proposing to install a new Regenerative Thermal Oxidizer (RTO). Eight (8) existing film cleaning and two (2) existing wet gate film printing machines that are using VOC containing solvents will be vented to the RTO to control and reduce the quantity of VOC emissions to the atmosphere and bring the operations into compliance with the existing equipment/group cap. Since the potential VOC emissions prior to control will be increased more than 1 pound per day from each machine, the equipment is required to have BACT under this project. The RTO is expected to meet 95% overall VOC control efficiency, therefore, the BACT requirement will be met. Upon installation and operation of the RTO, the company expects to request exemption from Title V by taking a facility VOC and HAP cap of less than 10 tpy.

**Summary of Applications**

<b>Application #</b>	<b>Equipment Description</b>	<b>Existing A/N, Permit #</b>	<b>Existing Emission Cap,</b>	<b>Proposed Facility Cap for VOC</b>
481187	RTO	New installation	N/A	1944 lb/mo facility VOC cap excluding 7 grandfathered film cleaners  Fac Cap of 10 tpy VOC and HAP will be added at P/O after RTO is installed and operating
481189	Film Cleaning	459611, F84248	18 gal/month	
481190	Film Cleaning	459612, F84256	18 gal/month	
481191	Film Cleaning	459613, F84257	18 gal/month	
481192	Film Cleaning	459614, F84258	18 gal/month	
481193	Film Cleaning	459615, F84261	18 gal/month	
481194	Film Cleaning	459616, F59616	18 gal/month	
481195	Film Cleaning	459617, F84274	18 gal/month	
481196	Film Cleaning	459630, F84263	18 gal/mo. with A/Ns 406439 & 406442	
481197	Wet-Gate Printing	406439, F56679	18 gal/mo. with A/Ns 406442 & 459630	
481198	Wet-Gate Printing	406442, F56678	18 gal/mo. with A/Ns 406439 & 459630	

The average & maximum operating schedule for this equipment:

24 hr/day	6 dy/wk	52 wk/yr	(average)
24 hr/day	7 dy/wk	52 wk/yr	(maximum)

This is a Title V facility and the Title V renewal permit was issued to the facility on October 1, 2006. This project is the 1<sup>st</sup> revision since the issuance of the Title renewal V permit. This permit revision will also include the removal of A/N 418285 (F64065), a film cleaning machine which has been removed.



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There are no complaints on record. The applicant received the following citations:

1. NOV P49331 on 7/27/07 for failure to submit semi annual report and exceeding the 18 gal/mo of solvent-usage limit.
2. NOV P46246 on 11/16/06 for failure to submit periodic monitoring report 500-SAM
3. NC D12004 on 7/12/07
  - a. submit proof of a certified smoke reader for mixing tanks.
  - b. submit records of solvent in film cleaning showing compliance with 24 lb/day and 18 gal/mo.
  - c. post correct permits on equipment
  - d. provide proof of submitting form 500-SAM for (July 06 - Dec 06).
4. NC D16587 on 6/7/08 for not having a certified smoke reader for the year 2007 for mixing tanks

The issues for the above NOV's are resolved and the cases are closed. The issues for the above NC's are being resolved.

**PROCESS DESCRIPTION:**

Deluxe Laboratories Inc. is in the business of film developing, film coloring and film duplication for the major motion picture industry. This company bids for jobs offered by the motion picture industry. The production rate as well as solvent emissions varies from year to year depending on the size and number of contracts. Therefore, the company does not have a constant pattern of solvent usage and emissions.

Presently, the company uses Perc. in a maximum of twelve (12) of their cleaning and printing machines at any one time. The machines are vented to an existing activated carbon adsorber whenever Perc. is used. These film cleaning machines will maintain capability to use perc and vent to the carbon adsorber. The wet gate printers are currently not allowed to use perc and are limited to 1 lb/day VOC. Since this equipment will be vented to the RTO, the VOC limit will be removed. A facility VOC cap of 1944 lb/month will be added based on the current 18 gal/mo solvent usage limits as summarized in the emission calculations. This cap will exclude seven grandfathered film cleaners with no limits.

A new RTO will be installed to control VOC emissions from 8 film cleaning and 2 wet-gate film printing machines that are using VOC containing solvents instead of perc. The RTO is equipped with a burner that will be used only for start up to bring the chamber up to 1700 °F. After a 30 minute soak period at 1700 °F. the burner shuts off and the gas injection comes on. The gas injection set point is 1500 °F. During normal operation, the burner is automatically shut off, and in addition to process gas, natural gas is injected at the inlet to the fan as necessary to maintain the temperature of the chamber at 1500 °F. According to burner manufacturer, the gas injection operation is flameless and the NOx emissions low.



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**RTO DESIGN:**

**Velocity and Retention Time:**

RTO Size	2000 cfm = 7774 acfm @ 1600 °F
Burner Rating	578,000 Btu/hr
Chamber Dimensions	42" W. X 20" H. X 114" L.
Combustion Chamber Velocity	21 ft/sec @ 100 °F

Flow is 2000 scfm or 7774 acfm @ 1600 F.

The volume of the combustion chamber is 55.4 cubic feet.

$$\text{Retention time} = ((55.4 \text{ ft}^3)/(7774 \text{ ft}^3/\text{min})) \times (60 \text{ sec}/\text{min}) = 0.43 \text{ seconds}$$

The cleaning and printing machines will be vented to the RTO at a maximum flow rate of less than 2000 scfm.

**RTO Size:**

The RTO is sized for 2000 scfm and the flow rate of the cleaning and printing machines vented to the RTO is less than 2000 scfm. Therefore, the RTO is adequately designed.

**RTO Heat Requirement:**

Since the natural gas is injected to maintain the temperature at 1500 °F. the system is adequately designed to meet the heat requirement.

**RTO is adequately designed to function properly for the purpose of controlling VOC emissions at an efficiency of at least 95% by weight as specified by the manufacturer.**

**EMISSION CALCULATIONS:**

The proposed project will increase the VOC emissions from each film cleaning and printing machine more than 1 lb/day based on the current equipment usage caps, therefore, BACT is triggered for each machine. The cleaning and printing machines that use VOC containing solvents at this facility will be vented to and controlled by the RTO. The RTO is expected to meet the BACT requirements. RTO is equipped with a burner that is used only during the start up to bring the temperature of the bed up to 1700 °F. During normal operation, the RTO will maintain temperature from the VOC in the process gas, and also is equipped with a natural gas injection system will be available to maintain a temperature of 1500 °F.

**Pre-modification potential to emit VOC Emissions:**

Density of solvent for the following calculations is assumed based on perchloroethylene since the applicant previously used perc. (when perc. was considered VOC) in thi equipment (based on previous evaluation when ODC converted to VOC).



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A/N 481189 (A/N 459611) 18 gallons/month x 13.5 lbs/gal = 243 lbs/mo.  
A/N 481190 (A/N 459612) 18 gallons/month x 13.5 lbs/gal = 243 lbs/mo.  
A/N 481191 (A/N 459613) 18 gallons/month x 13.5 lbs/gal = 243 lbs/mo.  
A/N 481192 (A/N 459614) 18 gallons/month x 13.5 lbs/gal = 243 lbs/mo.  
A/N 481193 (A/N 459615) 18 gallons/month x 13.5 lbs/gal = 243 lbs/mo.  
A/N 481194 (A/N 459616) 18 gallons/month x 13.5 lbs/gal = 243 lbs/mo.  
A/N 481195 (A/N 459617) 18 gallons/month x 13.5 lbs/gal = 243 lbs/mo.  
A/N 481196-98 (A/N 459630, 406439 & 406442) combined 18 gal/month x 13.5 lbs/gal = 243 lbs/mo.

The total VOC emissions allowed – 8 x 243 lb/mo = 1944 lb/mo. This limit will be added as a facility wide VOC condition to ensure no emission increase as a result of this modification.

The proposed modification will reduce the VOC emissions from the facility to less than 10 tons/yr, and the facility is requesting exemption from Title V after the RTO is installed. A 10 tpy facility VOC cap will be imposed at the P/O stage and the P/Os will be issued as command and control permits for all equipment at the facility.

The film cleaning and printing machines are enclosed systems (except for two slots where the film enters and exists) therefore, we assumed that 100% of VOC is captured and vented to the RTO. The RTO will be conditioned to 95% overall VOC control efficiency. The emissions from film cleaning & printing are as follows:

VOC for each film cleaning and film printing machine:

$$R1 = 4.4 \text{ lb/hr} \quad R2 = 4.4 \text{ lb/hr} (1-0.95) = 0.22 \text{ lb/hr}$$



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Some criteria pollutants will be emitted as a result of the products of combustion from the start-up burner in the RTO.

RTO

Net Emission Increase (A/N 481187)

	<u>maximum</u>	<u>normal</u>		
<u>hr/dy</u>	24	1	<u>max heat input</u>	5.78E+05 (BTU/hr)
<u>dy/wk</u>	7	6	<u>gross heating value</u>	1050 (BTU/scf)
<u>wk/yr</u>	52	52		
<u>load</u>	100%	75%		

	<u>Emission</u>	<u>MAX</u>	<u>AVE</u>	<u>MAX</u>	<u>30-DAY</u>	<u>MAX</u>	<u>MAX</u>
	<u>Factors</u>	(lb/hr)	(lb/hr)	(lb/dy)	(lb/dy)	(lb/yr)	(ton/yr)
SO <sub>2</sub> (R1)	0.83	0.000	0.000	0.011	NA	4	0.002
SO <sub>2</sub> (R2)	0.83	0.000	0.000	0.011	0.011	4	0.002
NO <sub>2</sub> (R1)	130	0.072	0.054	1.717	NA	625	0.313
NO <sub>2</sub> (R2)	130	0.072	0.054	1.717	1.717	625	0.313
CO (R1)	35	0.019	0.014	0.462	NA	168	0.084
CO (R2)	35	0.019	0.014	0.462	0.462	168	0.084
N <sub>2</sub> O (R1)	2.2	0.001	0.001	0.029	NA	11	0.005
N <sub>2</sub> O (R2)	2.2	0.001	0.001	0.029	0.029	11	0.005
PM, PM <sub>10</sub> (R1=R2)	7.5	0.004	0.003	0.099	0.099	36	0.018
CO <sub>2</sub> (R1=R2)	1.20E-05	0.000	0.000	0.000	0.000	0	0.000
TOC(R1=R2)	7	0.004	0.003	0.092	0.092	34	0.017
acetaldehyde	0.0043	2.4E-06	1.8E-06	5.7E-05	NA	2.07E-2	1.03E-5
acrolein	0.0027	1.5E-06	1.1E-06	3.6E-05	NA	1.30E-2	6.49E-6
benzene	0.008	4.4E-06	3.3E-06	1.1E-04	NA	3.85E-2	1.92E-5
formaldehyde	0.017	9.4E-06	7.0E-06	2.2E-04	NA	8.18E-2	4.09E-5
napthalene	0.0003	1.7E-07	1.2E-07	4.0E-06	NA	1.44E-3	7.21E-7
PAH's	0.0001	5.5E-08	4.1E-08	1.3E-06	NA	4.81E-4	2.40E-7
toluene	0.0366	2.0E-05	1.5E-05	4.8E-04	NA	1.76E-1	8.80E-5
xylenes	0.0272	1.5E-05	1.1E-05	3.6E-04	NA	1.31E-1	6.54E-5

NO <sub>2</sub> @ 3% excess O <sub>2</sub> ----->>>	<b>100.16</b>	(ppmv)	SO <sub>2</sub> @ 3% excess O <sub>2</sub> ----->>>	<b>0.46</b>	(ppmv)
CO @ 3% excess O <sub>2</sub> ----->>>	<b>44.29</b>	(ppmv)	PM @ 12% CO <sub>2</sub> ----->>>	<b>5.5E-09</b>	(grain/ft <sup>3</sup> )

Ver. 1.3

The emissions as a result natural gas combustion during start up for data entry are as follows. The start-up burner will typically run for 60-90 minutes from a cold start to get up to temperature (1500-1700 degrees F).

R1 = R2      NO<sub>x</sub>    = 0.072 lb/hr @ 24 hrs/day = 2 lb/day  
R1 = R2      CO        = 0.02 lb/hr @ 24 hrs/day = 0.48 lb/day



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Based on previous experience and according to the manufacturer, the flameless oxidation creates a negligible quantity of criteria pollutants, with less than 2 ppm NO<sub>x</sub>. During normal operation when venting the film cleaning and printing machines, the combustion emissions are calculated at 2 ppm NO<sub>x</sub> and 2000 scfm exhaust:

$$2 \text{ ppm NO}_x \text{ ft}^3/\text{ft}^3 \times 2000 \text{ ft}^3/\text{min} \times 60 \text{ min/hr} \times 46 \text{ lbNO}_2/\text{mole} \div 1 \text{ mole}/379 \text{ ft}^3 = 0.029 \text{ lb/hr}$$

The maximum emissions would be when the RTO starts from a cold start, assume 3 hrs/day, with the remaining 21 hrs/day @ 2 ppm NO<sub>x</sub>. Normally, starting from a cold start will not occur daily, or even weekly.

$$\text{R2 max lb/day} = (3 \text{ hr/day} \times 0.072 \text{ lb/hr}) + (21 \text{ hr/day} \times 0.029 \text{ lb/hr}) = 0.825 \text{ lb/day}$$

**AIR TOXIC EVALUATION:**

These applications were filed to install a new RTO to control VOC from film cleaning and printing machines. There will be a negligible increase in toxic emissions due to the combustion of natural gas in the RTO at start-up. Tier II indicates that MICR is below 1 in a million and HIC/HIA are less than 1.

There will be no increase in VOC or toxic emissions from the film cleaning and printing machines since the emission cap will remain the same; the individual solvent usage limits will be converted to a facility VOC emission limit. The cleaning and printing machines will most likely have a decrease in actual emissions.

**RULE EVALUATION:**

Rule 212(c)(1): This section requires a public notice for all new or modified permit units that may emit air contaminants located within 1,000 feet from the outer boundary of a school. Since there is no school located within 1,000 ft, a public notice is not required.

Rule 212(c)(2) &(g): These sections require a public notice for all new or modified facilities or sources that have on-site emission increases exceeding any of the daily maximums as specified by Rule 212(g). The emission increases from the burning of natural gas in the RTO start-up burner and the small amount during normal operation are below the daily maximums, therefore, public notice is not required.

Rule 212(c)(3): Public notice is not required - increase in toxics is negligible. MICR is less than 1 in a million, HIA/HIC less than one.

Rule 401: Compliance is expected. Visible emissions are not expected with the proper operation of the equipment.

Rule 402: Compliance is expected. Nuisance is not expected with the proper operation of the equipment, no complaints on file.



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Rule 1303(a): The film cleaning machines and wet gate printers are subject to BACT since there will be an increase in emissions from each permit unit. The RTO will control VOC emissions with an overall efficiency of at least 95% and is considered BACT. Combustion emissions from the start-up burner and during normal operation of the RTO are less than 1 lb/day. Compliance is expected.

Rule 1303(b)(1): Modeling is not required for VOC. Emissions from the RTO due to start-up (worst case hour) and normal operation are below the Table A-1 values, therefore modeling is not required.

Lb/hr	NO <sub>x</sub>	CO	PM <sub>10</sub>
Calculated	0.07	0.02	0.004
Rule 1303 Table A-1	0.2	11	1.2

Rule 1303(b)(2): There are no VOC emission increases from the facility. The emissions from the combustion of natural gas in the RTO during start-up and during normal operation are expected to be less than one, except for NO<sub>x</sub>. Offsets are not required for NO<sub>x</sub> since the emissions are exempt under Rule 1304 (d); facility emissions less than 4 tpy NO<sub>x</sub>. There are no other permitted NO<sub>x</sub> emissions sources at this facility.

Rule 1401: Compliance is expected. The increase in toxic emissions from the combustion of natural gas in the RTO start-up burner is negligible. See screening risk assessment – MICR is below 1 in a million HIC/HIA are less than 1.

Rule 1425: If perc is used this equipment will continue to be vented to the carbon adsorber. Compliance is expected.

**REG. XXX:**

The proposed project is considered as a “de minimis significant permit revision” to the Title V renewal permit issued to this facility on October 1, 2006 and this is the first revision since the renewal. Rule 3000(b)(6) defines a “de minimis significant permit revision” as any Title V permit revision where the cumulative emission increases of non-RECLAIM pollutants or hazardous air pollutants (HAP) from these permit revisions during the term of the permit are not greater than any of the following emission threshold levels:

Air Contaminant	Daily Maximum (lbs/day)
HAP	30
VOC	30
NO <sub>x</sub>	30
PM10	30
SO <sub>x</sub>	60
CO	220



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Rule 3003(j) specifies that a proposed permit for Title V permit should be submitted to EPA for review. To determine if a project qualifies for a “de minimis significant permit revision”, emission increases resulting from all permit revisions that are made after the submittal of a proposed permit to EPA shall be accumulated and compared to the above threshold levels. The proposed project is the first permit

revision requested by the facility since the renewal was issued. This permit revision involves the modification of eight (8) film cleaning and two (2) film printing machines to be vented to a new RTO.

The cumulative emission increases resulting from this proposed permit revision are summarized as follows:

<b>Revision</b>	<b>HAP</b>	<b>VOC</b>	<b>NO<sub>x</sub></b>	<b>PM<sub>10</sub></b>	<b>SO<sub>x</sub></b>	<b>CO</b>
1st Permit Revision. modification of eight film cleaning and two film printing machines by venting them to a new RTO. Application #s 481187, 481189-98	0	0	1	0	0	0
Cumulative Total	0	0	1	0	0	0
Maximum Daily	30	30	30	30	60	220

**CONCLUSION/RECOMMENDATION:**

The proposed project is expected to comply with all applicable District Rules and Regulations. Since the proposed project is considered as a “de minimis significant permit revision”, it is exempt from the public participation requirements under Rule 3006 (b). A proposed permit incorporating this permit revision will be submitted to EPA for a 45-day review pursuant to Rule 3003(j). If EPA does not raise any objections within the review period, a revised Title V permit will be issued to this facility.