

# South Coast Air Quality Management District

## Statement of Basis

### Proposed Title V Permit Renewal

<b>Facility Name:</b>	<b>Cambro Manufacturing Co.</b>
<b>Facility ID:</b>	<b>8309</b>
<b>SIC Code:</b>	<b>3089</b>
<b>Equipment Location:</b>	<b>7601 Clay Avenue Huntington Beach, CA 92648</b>
<b>Application #(s):</b>	<b>468293</b>
<b>Application Submittal Date(s):</b>	<b>04/25/07</b>
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#### 1. Introduction and Scope of Permit

Title V is a national operating permit program for air pollution sources. Facilities subject to Title V must obtain a Title V permit and comply with specific Title V procedures to modify the permit. This permit replaces the facility's other existing permits. Title V does not necessarily include any new requirements for reducing emissions. It does, however, include new permitting, noticing, recordkeeping, and reporting requirements.

Pursuant to Title V of the federal Clean Air Act and AQMD Rule 3004(f), a Title V permit shall expire five years from the date of issuance unless such permit has been renewed. Accordingly, each facility is required to submit a Title V renewal application and requested the AQMD to renew their Title V permit. The proposed permit incorporates updates to the facility information provided in the facility's Title V renewal application and all rules and regulations that are currently applicable to the facility.

The AQMD implements Title V through Regulation XXX – Title V Permits, adopted by the AQMD Governing Board in order to comply with EPA's requirement that local air permitting authorities develop a Title V program. Regulation XXX was developed with the participation of the public and affected facilities through a series of public workshops, working group meetings, public hearings and other meetings.

The Title V major source threshold for a particular pollutant depends on the attainment status of the pollutant. NO<sub>2</sub>, SO<sub>2</sub>, CO, and lead are in attainment with federal standards. The status for PM-10 is serious nonattainment. The status for ozone is currently extreme nonattainment.

A Title V permit is proposed to be issued to cover the operations of Cambro Manufacturing Co., 7601 Clay Avenue, Huntington Beach, CA 92648. This facility is subject to Title V requirements because it is a major source.

## **2. Facility Description**

Cambro Manufacturing Co. facility is a Title V facility that manufactures a variety of plastic products for the commercial food services industry. This facility operates one injection molding process, one compression molding process, one internal combustion engine to generate compressed air, two silkscreen printing electric drying ovens, one burn-off furnace to burn off residual plastics from injection nozzles, four plastic size reduction grinders and one portable plasma arc cutter. The VOC emissions from the burn-off oven are controlled by an afterburner. The PM emissions from the main plastic grinder are controlled by a cyclone and four bag filters. The PM emissions from the other three plastic grinders are currently controlled by three cyclones and will be further controlled by a dust collector.

## **3. Construction and Permitting History**

The facility has been in operation with a Title V permit at this location since 2002. An initial Title V permit was issued to the facility on August 1, 2002 and two permit revisions were subsequently issued to this facility.

## **4. Regulatory Applicability Determinations**

Applicable legal requirements for which this facility is required to comply are required to be identified in the Title V permit (for example, Section D, E, and H of the proposed Title V permit). Applicability determinations (i.e., determinations made by the District with respect to what legal requirements apply to a specific piece of equipment, process, or operation) can be found in the Engineering Evaluations. This facility is not subject to any NSPS requirements. However, the facility is subject to the requirements of 40CFR63 Subpart WWWW-National Emissions Standards for Hazardous Air Pollutants for Reinforced Plastic Composites Production. The requirements of this NESHAP are reflected in the Title V permit.

## **5. Monitoring and Operational Requirements**

Applicable monitoring and operational requirements for which the facility is required to comply are identified in the Title V permit (for example, Section D, F, and J and Appendix B of the proposed Title V permit). Discussion of any applicable operational requirements can be found in the Engineering Evaluations. All periodic monitoring requirements were developed using strict adherence to the following applicable guidance documents: SCAQMD Periodic Monitoring Guidelines for Title V Facilities (November 1997); CAPCOA/CARB/EPA Region IX Periodic Monitoring Recommendations for Generally Applicable Requirements in SIP (June 1999); and

CAPCOA/CARB/EPA Region IX Recommended Periodic Monitoring for Generally Applicable Grain Loading Standards in the SIP: Combustion Sources (July 2001).

Since the pre-control potential to emit of VOC and PM10 from the equipment are less than 10 and 70 tons per year, respectively, the Compliance Assurance Monitoring (CAM) requirements of 40 CFR Part 64 are not applicable to this facility.

**6. Permit Features**

**Permit Shield**

A permit shield is an optional part of a Title V permit that gives the facility an explicit protection from requirements that do not apply to the facility. A permit shield is a provision in a permit that states that compliance with the conditions of the permit shall be deemed compliance with all identified regulatory requirements. To incorporate a permit shield into the Title V permit involves submission of applications for change of conditions for each equipment affected by the permit shield. Permit shields are addressed in Rule 3004 (c). This facility has not applied for a permit shield.

**Streamlining Requirements**

Some emission units may be subject to multiple requirements which are closely related or redundant. The conditions may be streamlined to simplify the permit conditions and compliance. Emission limits, work practice standards, and monitoring, recordkeeping, and reporting requirements may be streamlined. Compliance with a streamlined condition will be deemed compliance with the underlying requirements whether or not the emission unit is actually in compliance with the specific underlying requirement. This facility has not applied for any streamlined conditions.

**7. Summary of Emissions and Health Risks**

**Criteria Pollutant Emissions (tons/year)  
Annual Reported Emissions for Reporting Period 2006/2007**

Pollutant	Emissions (tons/year)
NOx	11.236
CO	14.929
VOC	24.766
PM	0.936
SOx	0.015

**Toxic Air Contaminants Emissions (TAC)  
Annual Reported Emissions for Reporting Period 2006/2007**

The Following TACs Were Reported	Emissions (lbs/yr)
1,1,2,2-Tetrachloroethane	0.192
1,1,2-Trichloroethane	0.116
1,2-Dichloropropane {Propylene dichloride}	0.099
1,3-Butadiene	5.049
1,3-Dichloropropene	0.097
Acetaldehyde	21.475
Acrolein	20.136
Ammonia	914.760
Benzene	12.373
Carbon tetrachloride	0.135
Chloroform	0.104
Di (2-ethylhexyl) phthalate	163.800
Diethylene glycol	3.700
Dipropylene glycol monomethyl ether	808.384
Ethyl benzene	339.151
Ethylene dibromide	0.162
Ethylene dichloride	0.085
Ethylene glycol monobutyl ether	250.488
Formaldehyde	156.859
Hexane	11,866.023
Methanol	23.306
Methylene chloride	0.313
Naphthalene	0.752
PAHs, total, with components not reported	0.004
Propylene glycol monomethyl ether acetate	196.040
Styrene	12,406.898
Toluene	5.837
Vinyl chloride	0.054
Xylenes	28.174

**Health Risk from Toxic Air Contaminants**

The facility is subject to review by the Air Toxics Information and Assessment Act (AB2588). The Final Facility Health Risk was approved in 2000 with the following risk factors.

Cancer Risk	1.7 in one million
Acute Hazard Index	0.0019
Chronic Hazard Index	0.15

**8. Compliance History**

As noted, the facility has been in constant operation with a Title V permit since 2002. The facility has been subject to both self-reporting requirements and AQMD inspections. The facility has had no citizen complaints filed, Notices to Comply or Notices of Violation issued in the last two years.

**9. Compliance Certification**

By virtue of the Title V permit application and issuance of this permit, the reporting frequency for compliance certification for the facility shall be annual.