

**DRAFT ENGINEERING EVALUATION
Smilovitz Professional Services LLC; PLANT # 17850; APPLICATION # 14760**

Background

Smilovitz Professional Services LLC (SPS) has submitted an application for Authority to Construct and/or Permits to Operate for the following:

- S-1 Spray Booth & Oven, Binks PFF-20-8-T**
- S-2 Power Booth, Binks Powder Booth 12-8-T**

S-2 is exempt from permitting requirements, per Regulation 2-1-119.1.

Emissions

Based on the material usage proposed by SPS, the following emissions are estimated from their operation:

Description	Usage (gal/yr)	VOC (lb/gal)	Emissions (lb/yr)
Gray Primer	30	2.8	84
Semi gloss High Solid	100	2.8	280
Gloss H/Solid	60	2.8	168
Water Borne Acrylic	60	2.8	168
Water Baking Enamel	60	2.8	168
Cleanup Solvent	100	6.7	670
	TOTAL		1538 lb/yr

$$\text{POC} = 1538 \text{ lbs/yr} = 0.77 \text{ tons/yr} (< 10 \text{ lb/day} < 2 \text{ lb/hr})$$

$$\text{NPOC} = 0.77 \text{ tons/yr}$$

Although the solvents used in the coating and cleanup solvent are POCs; an identical emissions of NPOCs was estimated to allow flexibility to the facility to use NPOCs in the future.

Toxic Emissions

Review of the constituents of the coatings and solvents used indicates the existence of butyl cellosolve, methyl ethyl ketone, and isopropanol. However, the total estimated emissions of POCs do not exceed their respective risk screening trigger levels:

Butyl cellosolve : 7.7 E+02 lbs/yr, 3.1E+01 lbs/hr

Methyl Ethyl Ketone: 3.9E+04 lbs/yr, 2.9E+01 lbs/hr

Isopropanol: 2.7E+05 lbs/yr, 7.1 lbs/hr

As a result, a risk screening analysis is not required.

Statement of Compliance

The Spray Booth (S-1) is subject to and will be in compliance with Regulation 8-19 (miscellaneous metal parts), 8-31 (plastic), and 8-32 (wood), because complying coatings shall be used. S-2 is exempt from permitting requirements, per Regulation 2-1-119.1.

BACT

Because emissions are not estimated to exceed 10 pounds per day, Best Available Control Technology (BACT) review is not required.

Water's Bill

The project is within 1000 feet of the following school:

Fair Oaks Elementary
2950 Fair Oaks Ave.
Redwood City, CA 94063-3828

There are no other schools within 0.25 miles of the facility. This application triggers the public notification requirements of Regulation 2-1-412.

Toxics Risk Screening

A toxic risk screening is not required because there are no proposed chemicals with potential emissions that exceed the risk screening trigger level.

Offsets

Offsets are not required because this new facility's emissions shall not exceed 10 TPY.

CEQA

This application is considered ministerial under the District's CEQA guidelines (Regulation 2-1-311) and therefore is not subject to CEQA review. The engineering review for this project requires only the application of standard permit conditions and standard emission factors in accordance with Permit Handbook Chapter 5.6.

PSD, NSPS, NESHAPS

This application does not trigger any PSD, NSPS, or NESHAPS requirement.

Permit Conditions

Smilovitz Professional Services, LLC
Plant Number 17850
Application Number 14760

Conditions for S-1:

1. The owner/operator of S-1 shall not exceed the following usage limits during any consecutive twelve-month period:

Coating	310 Gallons
Cleanup Solvents	100 Gallons

 (Basis: Cumulative Increase)

2. The owner/operator may use usages in excess of those specified in Part 1, provided that the owner/operator can demonstrate that all of the following are satisfied:
 - a. Total POC emissions from S-1 do not exceed 1538 pounds in any consecutive twelve month period;
 - b. Total NPOC emissions from S-1 do not exceed 1538 pounds in any consecutive twelve month period; and
 - c. The use of these materials does not increase toxic emissions above any risk screening trigger level of Table 2-5-1 in Regulation 2-5.
 (Basis: Cumulative Increase; Toxics)

3. To determine compliance with the above parts, the owner/operator shall maintain the following records and provide all of the data necessary to evaluate compliance with the above parts, including the following information:
 - a. Quantities of each type of solvent used at this source on a monthly basis.
 - b. If material usage is other than that specified in Part 1, POC/NPOC and toxic component contents of each material used; and mass emission calculations to demonstrate compliance with Part 2, on a monthly basis;
 - c. Monthly usage and/or emission calculations shall be totaled for each consecutive twelve-month period.
 All records shall be retained on-site for two years, from the date of entry, and made available for inspection by District staff upon request. These recordkeeping requirements shall not replace the recordkeeping requirements contained in any applicable District Regulations.
 (Basis: Cumulative Increase; Toxics)

Recommendation

Waive Authority to Construct and issue a Permit to Operate for the following equipment:

S-1 Spray Booth & Oven, Binks PFF-20-8-T

Issue exemption status for the following equipment:

S-2 Power Booth, Binks Powder Booth 12-8-T [exempt per Regulation 2-1-119.1]

By: _____ 7/3/06
 M.K. Carol Lee Date
 Senior Air Quality Engineer

