

DRAFT
EVALUATION REPORT
Tomra Pacific, Inc.
Plant #11776
Application #16579

BACKGROUND

Tomra Pacific, Inc has applied for a Permit to Operate for the following source:

S-6 Metal Container Coating Operation

The plant is a recycling center in Fremont. District's inspector issued a Notice of Violation to this plant on June 14, 2007 for performing coating operation without a Permit to Operate. Then the plant submitted a permit application to the District on August 16, 2007 for S-6, which has been in operation since December 2006. The coating operation is to recondition metal containers (roll-off bins) for collecting recyclables by covering graffiti and scratches with paints. The application contact indicated that no organic solvent is used for surface preparation or cleanup since the containers requires no surface preparation and the rollers and brushes used to apply the touch up coating are disposable.

The coatings used at S-6 contain ethylene glycol butyl ether, a Toxic Air Contaminant as defined in Regulation 2-5. The outer boundary of a private elementary school, Stratford, is less than 1000 feet from S-6. Therefore, this application is subject to the public notification requirements per Regulation 2-1-412.

EMISSION CALCULATIONS

Basis:

- The plant uses two coatings at S-6: Warm Gray Water and Adams Blue Water. Both coatings have the same VOC concentration of 2.61 lb/gal. All VOC contents are assumed to be Precursor Organic Compound (POC).
- The plant has requested an annual throughput limit of 300 gallons total.
- The operating schedule of S-6 is 8 hours per day, 3 days per week, and 52 weeks per year.

	VOC Content (lb/gal)	Proposed Throughput (gal/yr)	Annual POC Emission (lb/yr)	(ton/yr)	Max. Daily Emission (lb/day)
Coatings	2.61	300	783.00	0.39	5.02

PLANT CUMULATIVE INCREASE (TPY)

Pollutant	Current	Proposed	New Total
NOx	0	0	0
CO	0	0	0
POC	4.92	0.39	5.31
PM10	0	0	0
SO2	0	0	0
NPOC	0.99	0	0.99

TOXICS SCREENING ANALYSIS

The coatings used at S-6 contain ethylene glycol butyl ether (EGBE), a Toxic Air Contaminant as defined in Regulation 2-5. However, Health Risk Screening Analysis is not required with this application since the EGBE emission from S-6 is lower than the chronic and acute trigger levels as shown below:

<u>EGBE Emitted*</u>		<u>EGBE Chronic Trigger</u>	<u>EGBE Acute Trigger</u>
<u>(lb/yr)</u>	<u>(lb/hr)</u>	<u>(lb/yr)</u>	<u>(lb/hr)</u>
285.3	0.58	770	31

*EGBE Emission, lb/yr = (Coating Usage, gal/yr) (Coating Density, lb/gal) (EGBE in Coating, % wt)
= (300 gal/yr) (10.01 lb/gal) (9.5%) = 285.3 gal/yr

EGBE Emission, lb/hr = (285.3 gal/yr) (yr / 245 day) (day / 2hr) = 0.58 lb/hr

The minimum operating time of 2 hr/day and 245 day/yr is used when no specific data is available, per Division Policy titled "Guidance for Calculating Maximum Hourly Toxic Air Contaminant Emission Rates" and dated June 16, 2005

PUBLIC NOTIFICATION

The project is within 1000 feet of a private school and therefore subject to the public notification requirements in Regulation 2-1-412. A public notice will be prepared and posted on the Internet. The public notice will be mailed to all Parents or Guardians with children enrolled at Stratford School, and all residential and business neighbors located within 1000 feet of the proposed new source of pollution.

STATEMENT OF COMPLIANCE

S-6 is subject to and expected to comply with Regulation 8, Rule 11, "Metal Container, Closure and Coil Coating". The two coatings used at S-6 have the same VOC content of 2.61 lb/gal, which meets the limits of 4.2 lb/gal and 3.5 lb/gal in Section 301.8 for

reconditioned interior and exterior of drums, pails, and lids. Section 501 requires daily record for each coating used, which will be included as part of the permit conditions.

California Environmental Quality Act (CEQA):

This project is considered to be ministerial under the District's CEQA Regulation 2-1-311 and therefore is not subject to CEQA review. The engineering review for this project requires only the fixed standards and objective measurements outlined in the Permit Handbook Chapter 5.1, and therefore is not discretionary as defined by CEQA.

Best Available Control Technology (BACT):

In accordance with Regulation 2-2-301, BACT is triggered for any new or modified source with the potential to emit 10 pounds or more per highest day of POC, NPOC, NO_x, CO, SO₂ or PM₁₀. Based on the emission calculations above, S-6 does not trigger BACT since the daily emission of POC is less to 10 pounds per highest day.

Offsets:

Offsets are not required since the facility's POC emissions are much less than 10 ton/yr.

A toxic risk screening analysis is not required.

PSD, NSPS, and NESHAPS are not required.

PERMIT CONDITIONS

For S-6, Coating Operation, at Plant # 11776:

1. The owner/operator of S-6 shall not exceed the following usage limit during any consecutive twelve-month period:
Warm Gray Water or Adams Blue Water Coating 300 Gallons
(Basis: Cumulative Increase)
2. The owner/operator may use an alternate coating(s) or cleanup solvent(s) other than the materials specified in Part 1 and/or 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-6 do not exceed 783 pounds in any consecutive twelve month period;
 - b. 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 coating used at this source on a daily basis;
 - b. If a material other than those specified in Part 1 is used, 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

Issue a conditional Permit to Operate to Tomra Pacific, Inc. for the following source:

S-6 Metal Container Coating Operation

Xuna Cai
Air Quality Engineer

11/1/07_____
Date