

EVALUATION REPORT
Miasole
Application #21673- Plant #17993
Santa Clara, CA

DRAFT

I. BACKGROUND

Miasole is a facility that is requesting an increase in throughput of its existing S-1 facility wide wipe clean operation. The facility would like to increase IPA solvent usage from 100 gallons to 262 gallons. This source is located within 1,000 feet of the outer boundary of a school and as such, this application requires Public Notification via Reg. 2-1-412. A Public Notice has been prepared and sent out to the home address of the students of the school and to each address within a radius of 1,000 feet of the source. This Evaluation Report will be posted on the District Webpage along with the Public Notice. A phone line is set-up at the District to receive public comments.

S-1 Facility Wide Wipe Clean Operation

II. EMISSION CALCULATIONS

S-1 Wipe Clean
 Operation
 Total Gallons 283
 Operating Time days/yr 364

Compounds	Gallons	lbm/gal	POCs		NPOCs	
			lbm/yr	lbm/day	lbm/yr	tons/yr
IPA	262.00	6.60	1729.20	4.75		0.86
Acetone	21.00	6.60		0.38	138.60	0.07

Previous A/N 17423

Compounds	Gallons	lbm/gal	POCs		NPOCs	
			lbm/yr	lbm/day	lbm/yr	tons/yr
IPA	100	6.6	660	1.81318	7	0.3300
Acetone	21	6.6		0.38076	138.6	0.0693

III. CUMULATIVE INCREASE

Cumulative Increases for S-1 – new facility

	lbm/day	lbm/yr	tons/yr
POCs	2.94	1069.2	0.5346
NPOCs	0.00	0.00	0

IV. BACT

The facility is applying BACT to source S-1 even though the facility did not exceed 10 lbm/day. For S-1, the wipe clean operation is not subject to BACT as emissions per day do not exceed 10 lbm/day.

S-1 is not subject to Regulation 2, Rule 2, Section 301 is not applicable. The facility is following good operating practices.

V. OFFSETS

Offsets are not required as all sources do not exceed 10 tons/yr.

VI. TOXIC RISK SCREEN ANALYSIS

No toxic air contaminant is emitted in quantities that would require a risk screen analysis. IPA has a trigger level of 2.7E5 lbm/yr and the facility’s IPA usage is well below this threshold.

VII. STATEMENT OF COMPLIANCE

S-1- Facility Wipe Cleaning Operation-. This facility is keeping usage records and complies with Reg 8, Rule 16, Section 501 Solvent Records. This facility is also in compliance with Reg 8, Rule 1, Section 321 under the heading of closed containers, where any solvent shall be kept in closed containers and Reg 8, Rule 1, Section 320, where cloths containing organic solvents shall be stored in closed containers. The facility is exempt from using aqueous cleaners (VOC content less than 50 grams/liter) per Reg 8, Rule 4, Section 116 since wipe cleaning is used on electrical components. The Facility complies with Reg 8 Rule 4, 302 (Solvent and Surface Coating Requirements) and Reg 8 Rule 4, Section 312 (Solvent Evaporative Loss Minimization). Facility is exempt from Reg 8, Rule 16 Section 301-304 for wipe cleaning operations per 8.16-111. This facility is not subject to Reg 2, Rule 2, Section 301 and 302 for S-1 as emissions do not exceed 10 lbs/day nor 10 tons/yr.

This application is considered to be ministerial under the District's proposed CEQA guidelines (Regulation 2-1-312) 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 6.3 for wipe cleaning operations.

BACT, PSD, NSPS, and NESHAPS are not triggered.

VIII. PERMIT CONDITIONS

Permit Conditions for Facility Wide Wipe Cleaning Operations:

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

IPA	262 Gallons
Acetone	21 Gallons

(Basis: Cumulative Increase)
2. The owner/operator may use an alternate 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-1 do not exceed 1729 pounds in any consecutive twelve month period;

- b. Total NPOC emissions from S-1 do not exceed 138 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 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)

IX. RECOMMENDATION

Waive Authority to Construct and issue a change in conditions for the following source:

S-1 Facility Wide Wipe Clean Operation

April 27, 2010

Irma C. Salinas
Senior Air Quality Engineer