



<b>Pollutant</b>	<b>Current Potential to Emit (TPY)</b>	<b>Potential to Emit from this Application (TPY)</b>	<b>Sources Shut Down (TPY)</b>	<b>Final Potential to Emit (TPY)</b>
<b>PM10</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0.00</b>
<b>POC</b>	<b>1.81</b>	<b>0.786</b>	<b>0</b>	<b>2.60</b>
<b>NPOC</b>	<b>0</b>	<b>1.977</b>	<b>0</b>	<b>1.98</b>
<b>NOx</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0.00</b>
<b>SO2</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0.00</b>
<b>CO</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0.00</b>

**OFFSETS**

The total Potential to Emit for the facility after start-up of the new source will be less than 100 TPY for each criteria pollutant and less than 10 TPY for each ozone precursor (NO<sub>x</sub> and POC).

Since the facility does not have the potential to emit more than 10 tons per year of nitrogen oxide or precursor organic compounds emissions on a pollutant-specific basis, the facility is not subject to NO<sub>x</sub> or POC offsets under Regulation 2-2-302.

Since the facility will not have the potential to emit more than 100 tons per year of any criteria pollutant, the facility is not a "Major Facility" as defined in Regulation 2-1-203, and is not subject to PM<sub>10</sub> or SO<sub>2</sub> offsets under Regulation 2-2-303.

**TOXIC RISK**

This source will emit isopropyl alcohol (IPA), which is considered a "Hazardous Air Pollutant" (HAP) under Regulation 2, Rule 5. The solvent emitted is as follows:

<b>Material Description</b>	<b>Chronic Usage (lb/yr)</b>	<b>Chronic Trigger (lb/yr)</b>	<b>Over Chronic Trigger?</b>	<b>Operation (hr/yr)</b>	<b>Acute Usage (lb/hr)</b>	<b>Acute Trigger (lb/hr)</b>	<b>Over Acute Trigger?</b>
<b>IPA</b>	<b>1,572</b>	<b>270,000</b>	<b>NO</b>	<b>832</b>	<b>1.9</b>	<b>7.1</b>	<b>NO</b>

Since the amount of IPA under is less than the chronic and acute trigger levels, a Health Risk Screening Analysis is not required under Regulation 2, Rule 5.

**BACT/TBACT REVIEW**

Under Regulation 2, Rule 2, any new source which results in an increase of more than 10 lbs per day of any criteria pollutant must be evaluated for adherence to BACT and TBACT control technologies. This solvent cleaner triggers BACT for POC emissions. For cold solvent cleaners, BACT requires compliance with Regulation 8, Rule 16 for all solvents, a freeboard ratio of at least 1, and either a 1 inch water layer or a requirement that the cleaner be covered at all times while in use. This solvent cleaner meets all of these requirements.

**PUBLIC NOTIFICATION REQUIREMENTS**

The proposed solvent cleaner is located within 1,000 feet of one or more schools providing educational services to students enrolled in kindergarten or grades 1 through 12. Under Section 42301.6 of the California Health and Safety Code, notification of the proposed new source must be mailed to the parents or guardians of all children enrolled in any school within one-quarter mile of the source, and to each address within a radius of 1,000 feet of the source, in order to give these parties an opportunity to provide public comment on the proposed actions. All comments received within 30 days of the publication of this notice will be reviewed and considered in the final evaluation and approval or denial of the application.

**COMPLIANCE DETERMINATION**

This cold solvent source is covered under ministerial exemption, Chapter 6.1 of the BAAQMD Permit Handbook. CEQA is not triggered for cold solvent cleaners under Regulation 2-1-311.

The source is not subject to any NSPS requirements as set out in 40 CFR Part 60.

The source is not subject to any National Emission Standard for Hazardous Air Pollutants (NESHAP) under Regulation 11.

PSD modeling is not triggered for this source.

**CONDITIONS**

Condition #24863, setting out the operating conditions and recordkeeping requirements for operations at Source S-3 shall be made part of the source’s authority to construct/permit to operate.

**RECOMMENDATION**

The proposed project is expected to comply with all applicable requirements of District, State, and Federal air quality related regulations. The preliminary recommendation is to issue an Authority to Construct for the equipment listed below. However, the proposed source will be located within 1000 feet of a school, which triggers the public notification requirements of Regulation 2-1-412.

I recommend that the District initiate a public notice, and consider any comments received before taking final action on issuance of an Authority to Construct for the following source:

**S-3 Cold Solvent Cleaner**

subject to Condition #24863.

By \_\_\_\_\_ Date \_\_\_\_\_  
*Catherine S. Fortney*

COND# 24863 -----

1. The owner/operator of S-3 shall not exceed the following usage limits during any consecutive twelve-month period:

Acetone	600 Gallons
Isopropyl alcohol	240 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-3 do not exceed 1,572 pounds in any consecutive twelve month period;
  - b. Total NPOC emissions from S-3 do not exceed 3,954 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)