

ENGINEERING EVALUATION REPORT

Plant Name:	CSL Operating, Inc.
Application Number:	24405
Plant Number:	20876

BACKGROUND

The applicant is applying for a Permit to Operate for a new Isopropyl Alcohol Wipe Cleaning Operation. The applicant is requesting an Authority to Construct for the following equipment:

S-4 IPA Wipe Cleaning Operation

CRITERIA POLLUTANT EMISSIONS CALCULATIONS

The proposed IPA Wipe Cleaning Operation consists of two custom built tanks, capable of containing a total of 18.42 gallons of isopropyl alcohol. The tanks will be operated within an exhaust hood which will vent to the atmosphere.

The Wipe Cleaning Operation is proposed to be operated 260 days per year (5 days per week, 52 weeks per year). If total IPA usage is limited to 390 gallons of IPA per year, total criteria pollutant emissions will be as follows:

TABLE 1 – CRITERIA POLLUTANT EMISSIONS

Material Description	Usage (gal/yr)	Density (lb/gal)	POC (wt %)	NPOC (wt %)	POC (lb/yr)	NPOC (lb/yr)	POC (lb/day)	NPOC (lb/day)
IPA	390	6.57	100.0%	0.0%	2,562	0.00	9.9	0.0

OLD SOURCES: EMISSION REDUCTIONS

The applicant is not planning to shut down any existing sources on start-up of the new wipe cleaning operation, therefore no contemporaneous on-site emission reductions were calculated.

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_x and POC) (see Attachment 1).

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_x 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 PM₁₀ or SO₂ offsets under Regulation 2-2-303.

CUMULATIVE EMISSIONS INCREASE

Changes to the cumulative emissions inventory are as follows:

TABLE 3 - CUMULATIVE EMISSION INCREASE INVENTORY

Pollutant	Current Emissions (TPY)	Application Emissions Increase (TPY)	Onsite Emissions Reductions Credits (TPY)	Offsets From DSFB (TPY)	Final Emissions (TPY)
PM10	0.000	0.000	0.000	0.000	0.000
POC	1.692	1.285	0.000	0.000	2.977
NPOC	2.878	0.000	0.000	0.000	2.878
NOx	0.000	0.000	0.000	0.000	0.000
SO2	0.000	0.000	0.000	0.000	0.000
CO	0.000	0.000	0.000	0.000	0.000

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:

Material Description	Chronic Usage (lb/yr)	Chronic Trigger (lb/yr)	Over Chronic Trigger?	Operation (hr/yr)	Acute Usage (lb/hr)	Acute Trigger (lb/hr)	Over Acute Trigger?
IPA	2,562	270,000	NO	2080	1.23	7.1	NO

Since the IPA emissions are 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. Since the total criteria pollutant emissions are less than 10 lbs per day of any criteria pollutant, the source does not trigger BACT. Since no toxic pollutants are emitted above the trigger levels listed in Regulation 2, Rule 5, Table 2-5-1, the source does not trigger TBACT.

PUBLIC NOTIFICATION REQUIREMENTS

The proposed wipe cleaning operation 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 wipe cleaning operations source is covered under ministerial exemption, Chapter 6.3 of the BAAQMD Permit Handbook. CEQA is not triggered wipe cleaning operations 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 #25305, setting out the operating conditions and recordkeeping requirements for operations at Source S-4 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 a Permit to Operate for the following source:

S-4 Wipe Cleaning Operations

subject to Condition #25305.

By _____ Date _____
Catherine S. Fortney

1. The owner/operator of S-4 shall not exceed the following usage limits during any consecutive twelve-month period:
IPA 390 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-4 do not exceed 10 pounds in any consecutive twenty-four hour period;
 - b. Total NPOC emissions from S-4 do not exceed 10 pounds in any consecutive twenty-four hour 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; Regulation 2, Rule 5)

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; and
 - 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; Regulation 2, Rule 5)

ATTACHMENT 1 – FACILITY-WIDE POTENTIAL TO EMIT

SOURCE	S CODE	SOURCE DESCRIPTION	THRUPUT	UNITS	COND	APPLIC	PM10 (lb/yr)	POC (lb/yr)	NPOC (lb/yr)	NOX (lb/yr)	SO2 (lb/yr)	CO (lb/yr)
2	SF01A157	Wipe Cleaning Operations	550	gal/year	23046	14211	0	1812.25	1801.25	0	0	0
3	SF01A455	Cold Solvent Cleaner	840	gal/year	24863	23036	0	1572.00	3954.00	0	0	0
4	SF01A157	Wipe Cleaning Operations	390	gal/year	11689	12621	0	2570.10	0.00	0	0	0
TOTAL							0	5,954	5,755	0	0	0
TPY							0	2.98	2.88	0	0	0
TOTAL FACILITY PTE =							5.85	TPY				