



4. **GOOD CAUSE:** Explain why your petition was not filed in sufficient time to issue the required public notice. (Required only for Emergency and Interim Variances; see Attachment A, Item 4)

This petition is being filed because of the malfunction/breakdown of the Facility's Alliance Corp. Kronos 206 Regenerative Thermal Oxidizer (RTO) operating under South Coast Air Quality Management District's Application Number 632693. The RTO is essential to Facility operations and no processes vented to the RTO may be operated unless the RTO is operating. As such the Facility is requesting an Interim Variance to allow normal operations to resume as quickly as possible.

Bristol provided notice of the malfunction to SCAQMD on the day of the incident. Following the incident Bristol began investigating options for repair and/or replacement of the RTO and interim solutions. Bristol personnel worked with third party engineering firms and SCAQMD staff to determine the correct pathway to move forward as quickly as possible and with the correct solution.

5. Briefly describe the type of business and processes at your facility.

Manufacture of a variety of aerospace fasteners including bolts, nuts, screws, rivets, and washers.

6. List the equipment and/or activity(s) that are the subject of this petition (see Attachment A, Item 6, Example #1). **Attach copies of the Permit(s) to Construct and/or Permit(s) to Operate for the subject equipment. For RECLAIM or Title V facilities, attach *only* the relevant sections of the Facility Permit showing the equipment or process and conditions that are subject to this petition. You must bring the entire Facility Permit to the hearing.**

Equipment/Activity	Application/ Permit No.	RECLAIM Device No.	Date Application/Plan Denied (if relevant)*
Regenerative Thermal Oxidizer	632693		

\*Attach copy of denial letter

7. Briefly describe the activity or equipment, and why it is necessary to the operation of your business. A schematic or diagram may be attached, in addition to the descriptive text.

The RTO is used to control VOC emissions generated during the application of dry film lubricants during aerospace fastener manufacturing operations. The fasteners require the deposition of lubricating material for ease of installation by the end user. The coatings may be applied using spray application techniques or through dip/tumble coating techniques. The fasteners are loaded into a mechanical tumbler and a solution that is a mixture of lubricant and solvent is added. The parts are tumbled to achieve a uniform coating of the dry film lubricant materials and then moved to a cabinet for curing. The entire process takes place in the Facility Lubrication Room which is operated as a Permanent Total Enclosure (PTE). Atmospheric emissions resulting from the processes are captured by the PTE and directed to the RTO.

The RTO is essential to process operations as fasteners may only be lubricated when the RTO is in operation.

8. Is there a regular maintenance and/or inspection schedule for this equipment? Yes  No   
 If yes, how often: Three times per year Date of last maintenance and/or inspection 10/04/2023

Describe the maintenance and/or inspection that was performed.

Preventative maintenance, see attached report.

9. List all District rules, and/or permit conditions [indicating the specific section(s) and subsection(s)] from which you are seeking variance relief (if requesting variance from Rule 401 or permit condition, see Attachment A). Briefly explain how you are or will be in violation of each rule or condition (see Attachment A, Item 9, Example #2).

Rule	Explanation
Conditions 1, 2, 3, 6, 9, 16 of AN 632693	Existing permit conditions require the use of the oxidizer to reduce VOC emissions and limit monthly VOC emissions from the process to 300 pounds per month. Because the oxidizer has been damaged and cannot be operated in its current state, the facility cannot comply with permit conditions requiring the use of the oxidizer and VOC emissions from the process may exceed 300 pounds per month during the variance period.
Rule 203	Existing permit conditions require the use of the oxidizer to reduce VOC emissions. Oxidizer has been damaged and cannot be operated in its current state.
Rule 1124(c)(1), (c)(4)	Rule 1124(c)(1) establishes VOC content limits for dry lubricants used in aerospace component manufacturing operations, The rule allows for the use of non-compliant coatings when emissions are controlled using an add-on air pollution control device. Because the oxidizer has been damaged and cannot be operated in its current state emissions resulting from the use of non-compliant coatings will not be controlled.

10. Are the equipment or activities subject to this request currently under variance coverage? Yes  No

Case No.	Date of Action	Final Compliance Date	Explanation

11. Are any other equipment or activities at this location currently (or within the last six months) under variance coverage? Yes  No

Case No.	Date of Action	Final Compliance Date	Explanation

12. Were you issued any Notice(s) of Violation or Notice(s) to Comply concerning this equipment or activity within the past year? Yes  No

If yes, you must attach a copy of each notice.

13. Have you received any complaints from the public regarding the operation of the subject equipment or activity within the last six months? Yes  No

If yes, you should be prepared to present details at the hearing.

14. Explain why it is beyond your reasonable control to comply with the rule(s) and/or permit condition(s). Provide specific event(s) and date(s) of occurrence(s), if applicable.

The malfunction/breakdown of the Alliance Corp. Kronos 206 RTO was first reported to the Facility's Environmental Team Leader at 04:29AM on Friday, November 17, 2023. The unit was secured, the Brea Fire Department was called, and the natural gas supply and the electricity to the unit were stopped. The operating temperature of the chambers still indicated a temperature near 1,600°F. The RTO was inspected at 06:30AM and it was observed that there were two hot spots, one on the top of the unit and one on the back side near the exhaust ducting and the ducting elbows were knocked off for the feed air from the PTE. The manufacturer was brought on site to conduct a preliminary analysis with the equipment operating in a cool down mode. The RTO was further inspected on Monday, November 20, 2023.

The timeline for repairs to the RTO equipment and ducting is currently unknown and is estimated to take anywhere from three weeks to a worst case scenario of three months if repairs are possible. Depending on the extent of the damage a replacement may be required. The Facility has an option to rent a 3000 CFM Boxidizer Model RTO from Alliance Corp. to allow partial use of the process and not shut down the critical process for the finished products. The permitting of the temporary RTO will require additional time.

15. When and how did you first become aware that you would not be in compliance with the rule(s) and/or permit condition(s)? Provide specific event(s) and date(s) of occurrence(s).

The Facility became aware of the problem with the equipment on November 17, 2023. See response to item 14.

16. List date(s) and action(s) you have taken since that time to achieve compliance.

The RTO was initially inspected at 06:30AM on November 17, 2023 and it was observed that there were two hot spots, one on the top of the unit and one on the back side near the exhaust ducting and the ducting elbows were knocked off for the feed air from the PTE. The manufacturer was brought on site to conduct a preliminary analysis with the equipment operating in a cool down mode. The RTO was further inspected on Monday, November 20, 2023.

An evaluation and review of the damage and an investigation continues at this time. Based on the results of the evaluation and investigation a proposed course of action will be developed.

17. What would be the harm to your business during **and/or after** the period of the variance if the variance were not granted?

Economic losses: Estimated potential losses through the end of the year are over \$2,000,000 in revenue. Depending on the time required to repair or replace the RTO this value could increase significantly.

Number of employees laid off (if any): Partial layoffs would be expected to occur if the facility cannot operate the dry film lubricant coating operations. The exact number is not clear but would likely start with 2-3 and could increase depending on impacts to overall production process/throughput.

Provide detailed information regarding economic losses, if any, (anticipated business closure, breach of contracts, hardship on customers, layoffs, and/or similar impacts).

The solid film lubricant application conducted in the PTE connected to the RTO is the final manufacturing process for a large portion of the products manufactured from A-286 Stainless Steel and Inconel 718 Nickel-Cobalt Alloy. This accounts for approximately 85% to 90% of the product manufactured at the facility. Without the capability to apply the solid film lubricants on products, it will reduce the competitiveness of the facility as an aerospace fastener manufacturer. With the continued inability to apply the solid film lubricants significant reductions in the volume of product that the company can manufacture will occur. Such limitations could potentially result in breach of contracts and irreparable harm to the facility's reputation and relationship with existing customers.

18. Can you curtail or terminate operations in lieu of, or in addition to, obtaining a variance? Please explain.

Under this variance, if granted, the facility intends to limit operations by reducing the quantity of Rule 1124 non-compliant coatings applied in the equipment. To eliminate or otherwise terminate the application of dry film lubricants would result in substantial financial loss a potential taking of a business.

19. Estimate excess emissions, if any, on a daily basis, including, if applicable, excess opacity (the percentage of total opacity above 20% during the variance period). If the variance will result in no excess emissions, insert "N/A" here and skip to No. 20.

Pollutant	(A)	(B)	(C)*
	Total Estimated Excess Emissions (lbs/day)	Reduction Due to Mitigation (lbs/day)	Net Emissions After Mitigation (lbs/day)
VOC	91.90	49.15	42.75

\* Column A minus Column B = Column C

Excess Opacity: \_\_\_\_\_ %

20. Show calculations used to estimate quantities in No. 19, or explain why there will be no excess emissions.

**Excess Emission Calculations**

Scenario	Coating	Volume (gal/day)	VOC (lbs/gal)	VOC emissions (lbs/day)	Controlled VOC (lbs/day)	Excess VOC (lbs/day)
Pre-mitigation	Everlube 620C	2	5.28	10.56	0.53	10.03
	Kal-Gard FA	1	5.81	5.81	0.29	5.52
	MEK	6	6.76	40.56	2.03	38.53
	FA solvent	5	6.65	33.25	1.66	31.59
	PermaSlick 1460W	2	0.46	0.92	0.05	0.87
	Cetyl (sol)	2	2.82	5.64	0.28	5.36
<b>Total</b>						91.90
Post mitigation	Everlube 620C	1	5.28	5.28	0.26	5.02
	Kal-Gard FA	0.5	5.81	2.905	0.15	2.76
	MEK	3	6.76	20.28	1.01	19.27
	FA solvent	1.5	6.65	9.975	0.50	9.48
	PermaSlick 1460W	2	0.46	0.92	0.05	0.87
	Cetyl (sol)	2	2.82	5.64	0.28	5.36
<b>Total</b>						42.75

21. Explain how you plan to reduce (mitigate) excess emissions during the variance period to the maximum extent feasible, or why reductions are not feasible.

Production involving non-compliant VOC-containing coatings that require operation of the RTO as an air pollution control device was immediately suspended when the RTO malfunctioned

The Facility will limit use of non-compliant VOC-containing coatings to approximately 50% of the maximum volumes typically used when the oxidizer is operational.

22. How do you plan to monitor or quantify emission levels from the equipment or activity(s) during the variance period, and to make such records available to the District? **Any proposed monitoring does not relieve RECLAIM facilities from applicable missing data requirements.**

Coating usage will be monitored and recorded in accordance with the permit conditions and SCAQMD Rule 109.

23. How do you intend to achieve compliance with the rule(s) and/or permit condition(s)? Include a detailed description of any equipment to be installed, modifications or process changes to be made, permit conditions to be amended, etc., dates by which the actions will be completed, and an estimate of total costs.

Bristol Industries is making every effort to have the RTO serviced and repaired as quickly as possible. The processes vented to the RTO have not operated since November 17, 2023.

The timeline for repairs to the RTO equipment and ducting could be anywhere from three weeks to a worst case scenario of three months. The Facility has an option to rent a 3000 CFM Boxidizer Model RTO from Alliance Corp. to allow partial use of the process and not shut down the critical process for the finished products; however, due to permitting time lines this is not seen as a feasible option.

Bristol is consulting a professional engineering firm to conduct a root cause analysis and develop a solution. This investigation is ongoing. If the RTO can be repaired, it could take up to 90 days for completion once it has been released by the engineering firm and approved for repair. In lieu of repairing the unit the facility may need to install a complete replacement that will require permitting with SCAQMD that could extend the date for return to compliance to up to one year.

24. State the date you are requesting the variance to begin: December 1, 2023; and the date by which you expect to achieve final compliance: December 1, 2024.

If the regular variance is to extend beyond one year, you **must** include a **Schedule of Increments of Progress**, specifying dates or time increments for steps needed to achieve compliance. See District Rule 102 for definition of Increments of Progress (see Attachment A, Item 24, Example #3).

List Increments of Progress here:



## ATTACHMENT A

### ITEM 1

Type of Variance Requested:

- (a) **SHORT:** If compliance with District rule(s) can be achieved in **90 days or less**, request a short variance. *(Hearing will be held approximately 21 days from date of filing--10-day posted notice required.)*
- (b) **REGULAR:** If compliance with District rule(s) will take **more than 90 days**, request a regular variance. If the variance request will extend beyond one year, you **must** include a specific detailed schedule of increments of progress [see Page 8, No. 24] under which you will achieve final compliance. *(Hearing will be held approximately 45 days from date of filing--30-day published notice required.)*
- (c) **EMERGENCY:** If non-compliance is the result of an unforeseen emergency, such as a sudden equipment breakdown, power failure, or accidental fire, you may request an emergency variance. You may request an *ex parte* emergency variance in addition to an emergency variance. **An emergency variance cannot be granted for more than 30 days.** *(Hearing will be held within 2 working days from the date of filing, whenever possible, excluding Mondays, weekends, and holidays.)* **If you request an emergency variance, you must answer No. 4 on page 1.**
- (d) **EX PARTE EMERGENCY:** If variance coverage is required on a weekend or when the Board is not in session, and you cannot wait until an emergency variance hearing can be held, you may request an *ex parte* emergency variance. An *ex parte* emergency variance will be granted or denied solely on the information contained in the petition and the District's response to the petition. Under most circumstances, an *ex parte* emergency variance will remain in effect only until a hearing can be held. **If you request an *ex parte* variance, you must answer No. 4 on page 1.**
- (e) **INTERIM:** If you require immediate relief (other than for emergencies) to cover the time until a short or regular variance hearing can be held, request an interim variance. If you request an interim variance, you must also request a short or a regular variance on the same petition. *(Hearing will be held approximately 2 working days from date of filing, whenever possible, excluding Mondays, weekends and holidays.)* **If you request an interim variance, you must answer No. 4 on page 1.**

### ITEM 4

**GOOD CAUSE:** The Hearing Board is required to provide public notice of variance hearings, as the public has a right to attend and testify at such hearings. In order for the Hearing Board to hold an Interim, *Ex Parte* Emergency or Emergency Variance hearing without the required public notice, a petitioner must present facts which will support a determination by the Board that "good cause" exists to hear a variance without notifying the public about the variance and providing the public with an opportunity to present evidence concerning the variance.

### ITEM 6

Example #1:

Equipment/Activity	Application/ Permit No.	RECLAIM Device No.	Date Application/Plan Denied (if relevant)*
Tenter frame		D32	
Chrome-plating tank	M99999		
Bake oven	123456		
Create special effects (fog)	N/A	N/A	N/A
Mfg., sale, distribution, use of non-compliant coating	N/A	N/A	12/10/95

**ITEM 9**

a) If you are requesting relief from Rule 401 and the excess opacity during the variance period will reach or exceed 40%, you should also request relief from California Health and Safety Code Section 41701.

b) If you are requesting relief from a permit condition(s), you should also request relief from the rule requiring compliance with conditions of the permit: 202(a), (b) or (c) - Temporary Permit to Operate; 203(b) - Permit to Operate; 2004(f)(1) – RECLAIM Permit; 3002(c) – Title V Permit.

**Example #2:**

<b>Rule</b>	<b>Explanation</b>
404(a)	tenter frame is vented to damaged air pollution control equipment
2004 (f)(1) [Condition No. 28-2 of Facility P/O No. 099999]	source test cannot be conducted as required until new ESP is installed
1113(c)(2)	petitioner manufactures and sells clear wood finishes with VOCs in excess of 350 grams per liter
401(a) & California H&S Code Section 41701	Opacity will exceed 45%.

**ITEM 24**

**Example #3:**

**Sample Schedule of Increments of Progress**

- Permit application(s) will be submitted to the District by [date].
- Contracts for the purchase of emission control systems will be awarded by [date].
- On-site construction will be completed by [date].

English	<b><i>"If you require a language interpreter in order to participate in the hearing, contact the Clerk of the Board at least five (5) calendar days before your hearing at 909-396-2500 or by e-mail at <a href="mailto:clerkofboard@aqmd.gov">clerkofboard@aqmd.gov</a>. Specify the case name and number, hearing date, and the language for which you are requesting an interpreter."</i></b>
Farsi	"اگر برای شرکت در جلسه استماع به مترجم نیاز دارید، حد اقل پنج (5) روز تقویمی قبل از جلسه استماع، با منشی هیئت توسط شماره تلفن 909-396-2500 یا بوسیله نامه الکترونیکی با نشانی <a href="mailto:clerkofboard@aqmd.gov">clerkofboard@aqmd.gov</a> تماس بگیرید. نام پرونده و شماره آن، تاریخ جلسه استماع و زبانی را که برای آن مترجم درخواست کرده اید، مشخص کنید"
Arabic	"إذا كنت في حاجة لمترجم من أجل المشاركة في جلسة الاستماع، اتصل بكتاب المحكمة قبل موعد جلسة الاستماع بخمسة (5) أيام على هاتف 2500-396-909. حدد اسم ورقم القضية و تاريخ الاستماع واللغة التي تريد في <a href="mailto:clerkofboard@aqmd.gov">clerkofboard@aqmd.gov</a> 396-909 أو بالبريد الإلكتروني على مترجم لها."
Armenian	"Ռեկվիրոյթը մասնակցելու համար, եթե թարգմանչի կարիքն ունենաք, նախքան ձեր ռեկվիրոյթումը, ամենաքիչն հինգ (5) օրացույցային օրից առաջ կապվեք համաձայնսրի բարոտղարի հետ, 909-396-2500 հեռախոսահամարով կամ էլեկտրոնային հասցեով <a href="mailto:clerkofboard@aqmd.gov">clerkofboard@aqmd.gov</a> : Նշեք գործի անունն և համարը, ռեկվիրոյթյան թվականը, և լեզուն, որի համար թարգմանչի էք ցանկանում"
Vietnamese	"Nếu quý vị cần Thông Dịch Viên cho buổi điều trần, xin vui lòng điện-thoại cho Thư Ký Hội Đồng tại số 909-396-2500 trễ nhất là năm [5] ngày, không tính hai ngày Thứ Bảy và Chủ Nhật, trước buổi điều trần hoặc gửi điện thư đến <a href="mailto:clerkofboard@aqmd.gov">clerkofboard@aqmd.gov</a> . Nhớ ghi rõ tên và số hồ sơ, ngày điều trần, và ngôn ngữ quý vị cần có người để thông dịch."
Chinese	如果你要求翻譯來協助你參加聽證會，請在你的聽證會前至少提前五天（5個日曆日）打電話到909-396-2500或發電子郵件到 <a href="mailto:clerkofboard@aqmd.gov">clerkofboard@aqmd.gov</a> 與局裏的辦事人員聯絡。並且明確說明你的案子的名稱和號碼，聽證日期，以及你要求的
Japanese	公聴会（ヒアリング）に参加するために通訳が必要な場合、少なくとも <b>5</b> 日前までに事務局（Clerk of the Board）にご連絡ください。電話でのご連絡は909-396-2500、e-メールでのご連絡は <a href="mailto:clerkofboard@aqmd.gov">clerkofboard@aqmd.gov</a> . までお願いします。その際、案件名（case name）と案件番号（case number）、ヒアリングの日付、通訳が必要な言語を特定して下さい。
Korean	"만약 귀하나 귀하의 증인들이 심리에 참여하기 위해 통역사가 필요하시면, 심리일 5일 전까지 기관부서의 서기에게 909-396-2500으로 연락하시거나, <a href="mailto:clerkofboard@aqmd.gov">clerkofboard@aqmd.gov</a> 로 연락 하십시오. 통역이 필요하신 사건의 이름, 심리날짜, 그리고 언어를 정확하게 말씀해 주십시오."
Spanish	Si usted requiere un intérprete para poder participar en la audiencia, favor de comunicarse con el Secretario de la Junta cuando menos cinco (5) días hábiles antes de su audiencia al teléfono (909) 396-2500 ó por correo electrónico al <a href="mailto:clerkofboard@aqmd.gov">clerkofboard@aqmd.gov</a> . Especifique el nombre y el número de su causa, la fecha de la audiencia y el idioma del cual está solicitando el intérprete.
Tagalog	"Kung kailangan ninyo nang interpreter sa Pilipino para makasali kayo sa pagdinig sa kaso, tumawag lang po kayo sa Clerk of the Board sa numero 909-396-2500 or kung hindi mag-email kayo sa email <a href="mailto:clerkofboard@aqmd.gov">clerkofboard@aqmd.gov</a> . Kailangan na tumawag kayo sa loob nang limang araw (5 days) bago ang inyong hearing date at ibigay and inyong pangalan at case number, araw nang inyong pagdinig sa kaso at inyong gusto na may lenguahe na interpreter".
Thai	หากคุณต้องการล่ามในการขึ้นศาล ให้ติดต่อเจ้าหน้าที่ล่วงหน้าอย่างน้อย 5 วันก่อนวันขึ้นศาล โดยติดต่อที่เบอร์โทร 909-396-2500 หรือโดย e-mail ที่ <a href="mailto:clerkofboard@aqmd.gov">clerkofboard@aqmd.gov</a> ใ้บอกชื่อและหมายเลขของคดี พร้อมทั้งวันเวลาในการขึ้นศาล และระบุภาษาที่คุณต้องการล่าม

