



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

EMAILED and Sent by Regular Mail: June 22, 2017

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Mr. Scott Bevans
Quemetco Inc.
720 S. 7th Avenue
City of Industry, CA 91746-3124

Subject: Conditional Approval of Rule 1402 Risk Reduction Plan for
Quemetco Inc., City of Industry (SCAQMD Facility ID No.: 8547)

Dear Mr. Bevans:

This letter provides conditional approval of the Updated Risk Reduction Plan (RRP) submitted by Quemetco pursuant to the Air Toxics "Hot Spots" Information and Assessment Act (AB2588) and South Coast Air Quality Management District' (SCAQMD) Rule 1402. Details regarding the conditional approval of the Updated RRP are provided below.

Background

In accordance with AB2588 and SCAQMD Rule 1402, SCAQMD staff notified Quemetco on May 17, 2016 that it must submit a RRP, which was submitted on November 16, 2016. SCAQMD staff rejected the November 2016 RRP because it lacked sufficient measures to ensure the reliable operation and enforcement of the proposed multiple metal Continuous Emissions Monitoring System (CEMS). Quemetco submitted an Updated RRP on March 21, 2017.

Risk Reduction Plan Conditional Approval

SCAQMD staff hereby grants conditional approval of the Quemetco March 2017 Updated RRP with the addition of the following mutually agreed conditions. Please be advised that the final permit language may be different, but they will preserve the intent of the Conditionally Approved Updated RRP and mutually agreed conditions as described below:

1. **Annualized Arsenic Emissions.** The rolling 30-day summed arsenic emissions (based on the Wet Electrostatic Precipitator (WESP) multiple metals CEMS readings) times 12.167 shall not exceed 6.500 pounds of arsenic. (365 days / 30 days = 12.167) The day begins on (and includes) midnight and ends just before midnight. This shall be effective 31 days after permit issuance to allow 30 days of data collection to begin the rolling 30-day average.
2. **Missing Data Substitution.** Quemetco shall use the 1N Procedures (refer to SCAQMD Rule 2011/2012, Attachment A) for missing data substitution. Quemetco shall identify which data hours were generated using the 1N Procedures.

3. **CEMS Data Transmittal.** Quemetco shall transmit the WESP multiple metals CEMS arsenic data daily (23 data points per day since one hour is lost to calibration). The data will be transmitted within 24 hours of the last data point collected for the day. The data files shall be transmitted and/or made accessible to the designated SCAQMD contact.
4. **CEMS Testing.** At a minimum, Quemetco shall perform one set of three California Air Resources Board (CARB) Method 436 runs annually. Should the annualized emissions from the average of the three runs exceed 3.25 pounds arsenic per year, Quemetco shall perform a subsequent set of three CARB Method 436 runs within six months. Should the annualized emissions from the average of the three runs fall below 3.25 pounds arsenic per year, Quemetco shall perform a subsequent set of three CARB Method 436 runs within twelve months. Quemetco may use the Rule 1420.1 Compliance Test to satisfy this requirement.
5. **Arsenic Emissions Notification and Submittal of Arsenic Risk Reduction Measures.** When the rolling 30-day annualized arsenic emissions reach or exceed 5.85 pounds, Quemetco shall notify SCAQMD within 24 hours or the next SCAQMD business day. Additionally, Quemetco shall submit a list of arsenic risk reduction measures, which Quemetco has taken or will take to reduce arsenic emissions and ensure that the 6.5 pound limit is not exceeded, within 96 hours or the next SCAQMD business day of reaching or exceeding 5.85 pounds of arsenic (annualized, see calculation in Condition 1).
6. **WESP CEMS Failure or Shutdown.** For WESP multiple metals CEMS failure or shutdown which exceeds 24 hours, Quemetco shall notify SCAQMD within 24 hours or the next SCAQMD business day. In the case of a CEMS failure or shutdown, compliance with the monitoring provisions in the RRP is waived for a period not to exceed 96 consecutive hours. Beyond 96 consecutive hours, Quemetco shall file a petition for an interim variance in accordance with Regulation V and shall terminate at the time the Hearing Board acts upon such variance petition.
7. **Arsenic Emissions and CEMS Failure or Shutdown Notifications.** Quemetco shall notify the designated SCAQMD contact. This notification should be done via electronic mail.

If you have any questions regarding this Conditional Approval of the Updated RRP, please contact me at (909) 396-3176.

Sincerely,



Jillian Wong, Ph.D.
Planning and Rules Manager

cc: Mike Buckantz, Quemetco
Jill Whynot, SCAQMD
Kurt Wiese, SCAQMD
Philip Fine, SCAQMD
Laki Tisopulos, SCAQMD
Jason Low, SCAQMD
Bayron Gilchrist, SCAQMD

**RULE 2011 PROTOCOL-
ATTACHMENT A**

1 N PROCEDURE

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ATTACHMENT A

1 N PROCEDURE

A. APPLICABILITY

1. This procedure may be used to provide substitute data for affected sources that meet the specified conditions in Chapter 2, Subdivision E, Paragraph 1, Subparagraph b, clause i and Chapter 2, Subdivision E, Paragraph 2, Subparagraph c, clause i.

B. PROCEDURE

1. Where N is the number of hours of missing emissions data, determine the substitute hourly SO_x concentration (in ppmv), the fuel gas sulfur content (in ppmv), or the hourly flow rate (in scfh) by averaging the measured or substituted values for the 1N hours immediately before the missing data period and the 1N hours immediately after the missing data period.
2. Where 1N hours before or after the missing data period includes a missing data hour, the substituted value previously recorded for such hour(s) pursuant to the missing data procedure shall be used to determine the average in accordance with Subdivision B, Paragraph 1 above.
3. Substitute the calculated average value for each hour of the N hours of missing data.

EXAMPLES OF 1 N PROCEDURE

EXAMPLE 1

HOUR	DATA POINT (LB/HR)
1:00 A.M.	30
2:00 A.M.	25
3:00 A.M.	32
4:00 A.M.	34
5:00 A.M.	Missing
6:00 A.M.	Missing
7:00 A.M.	Missing
8:00 A.M.	27
9:00 A.M.	22
10:00 A.M.	25
11:00 A.M.	30

To fill in the missing three hours, take the data points from the 3 hours before and the 3 hours after the missing data period to determine an average emission over the 3 hours

$$\text{average emissions} = \frac{25 + 32 + 34 + 27 + 22 + 25}{6} = 27.5 \text{ lb/hr.}$$

The filled in data set should read as follows:

EXAMPLE 1 (continued)

HOUR	DATA POINT (LB/HR)
1:00 A.M.	30
2:00 A.M.	25
3:00 A.M.	32
4:00 A.M.	34
5:00 A.M.	27.5
6:00 A.M.	27.5
7:00 A.M.	27.5
8:00 A.M.	27
9:00 A.M.	22
10:00 A.M.	25
11:00 A.M.	30

EXAMPLES OF 1 N PROCEDURE

EXAMPLE 2

HOUR	DATA POINT (LB/HR)
1:00 A.M.	45
2:00 A.M.	50
3:00 A.M.	53
4:00 A.M.	Missing
5:00 A.M.	Missing
6:00 A.M.	Missing
7:00 A.M.	58
8:00 A.M.	Missing
9:00 A.M.	48
10:00 A.M.	45

In this example the missing data point at 8 A.M. is in the 3-hour period after the 3- hour missing data period. We first fill the 8.A.M. slot.

$$\text{average emissions for 8 A.M.} = \frac{58 + 48}{2} = 53$$

The filled in data sheet at this point should read as follows:

EXAMPLE 2 (continued)

HOUR	DATA POINT (LB/HR)
1:00 A.M.	45
2:00 A.M.	50
3:00 A.M.	53
4:00 A.M.	Missing
5:00 A.M.	Missing
6:00 A.M.	Missing
7:00 A.M.	58
8:00 A.M.	53
9:00 A.M.	48
10:00 A.M.	45

The average for the three hour missing data period is:

$$\text{average emissions} = \frac{45 + 50 + 53 + 58 + 53 + 48}{6} = 51.2$$

The completed filled in data sheet should read as follows:

EXAMPLE 2 (continued)

HOUR	DATA POINT (LB/HR)
1:00 A.M.	45
2:00 A.M.	50
3:00 A.M.	53
4:00 A.M.	51.2
5:00 A.M.	51.2
6:00 A.M.	51.2
7:00 A.M.	58
8:00 A.M.	53
9:00 A.M.	48
10:00 A.M.	45