

**MONTEREY BAY UNIFIED AIR POLLUTION CONTROL DISTRICT
PROPOSED TITLE V OPERATING PERMIT TV70-01**

24580 Silver Cloud Court
Monterey, CA 93940
Telephone: (831) 647-9411

ISSUED TO:

Lhoist North America of Arizona, Inc.
dba Lhoist North America
P.O. Box 1938
Salinas, CA 93902

PLANT SITE LOCATION:

11771 Old Stage Road
Salinas, California

ISSUED BY:

Richard Stedman, Air Pollution Control Officer

January 1, 2013
Proposed Effective Date

Nature of Business: Mining & Non-metallic Mineral Processing

SIC Code: 1422 – Dolomite Mining & Processing
3274 – Dolomitic Lime

RESPONSIBLE OFFICIAL:

Name: Mr. R. C. Randall
Title: Plant Manager
Phone: (831) 449-4868

FACILITY CONTACT PERSON:

Name: Mr. Mark Zanko
Title: Plant Engineer
Phone: (831) 444-3310

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FACILITY DESCRIPTION

Lhoist North America operates a mineral processing facility located in the Natividad area North-East of Salinas, California. This facility was originally constructed in 1942. This facility is designated as the Natividad Plant by Lhoist North America, and is a mining and non-metallic mineral processing plant. At this facility dolomite is mined, crushed and screened to produce raw dolomite mineral products for sale, or to be further processed to produce calcined dolomite for sale.

The Natividad Plant is considered a federal Major Source and subject to the Title V permitting program due to the potential to emit Oxides of Nitrogen (NO_x) and Particulate Matter less than 10 microns in diameter (PM₁₀).

EQUIPMENT DESCRIPTION

MINING & NON-METALLIC MINERAL PROCESSING FACILITY CONSISTING OF:

1. Mobile Surface Mining Equipment, Mined Material To Primary Crushing & Screening.
2. Primary Crushing & Screening, Material to Heavy Media Separation System, ¾" Material To Primary Byproduct Stockpile.
3. Heavy Media Separation System, Dolomite Rock To Secondary Crushing & Screening, Dolomite Sand To East Plant, And Float Rock to Construction Product Stockpile. Recycled Process Water Pumped By One 225 Bhp Diesel Engine Pump Set.
4. Secondary Crushing & Screening, Providing Sized Material To The East Plant, The Dolomite Sizing Facility, The Lime Plant For Milling, The Kilns, Or To Stockpiles for Shipment.
5. East Plant, Dolomite Dried In A 5 MMBtu/Hr Natural Gas Fired Rotary Dryer And Product Processed For Shipment By Screening And Milling, Finished Product To Storage, Then To Truck Loadout And/Or Sacking Systems. The Rotary Dryer Is Vented To A Multiclone And A Baghouse Dust Collector, And All Other Emission Points Are Vented To Baghouse Dust Collectors.
6. Dolomite Sizing Facility, Dolomite Prepared For Shipment By Drying In A 5 MMBtu/Hr Natural Gas Or Fuel Oil Fired Rotary Dryer, Then Crushed And/Or Screened And/Or Milled, Finished Product To Storage, Then To Truck Loadout And/Or Sacking Systems. The Rotary Dryer And All Other Emission Points Are Vented To Baghouse Dust Collectors.
7. Lime Plant Milling, Dolomite Prepared For Shipment By Milling, Finished Product To Storage, Then To

Truck Loadout And/Or Sacking Systems. All Emission Points Are Vented To Baghouse Dust Collectors.

8. Kilns, Dolomite Calcined In Kilns 1 Through 4 (Identified Below), Then The Calcined Dolomite Is Prepared For Shipment By Screening And Milling, With The Finished Product To Storage And Truck Loadout. All Emission Points Vented To Baghouse Dust Collectors.

Kiln Number 1, 8.5' Diameter By 298.5' Long Rotary Kiln, 95 MMBtu/Hr Maximum Heat Input, Fuel Oil And/Or Natural Gas Fired. Kiln Vented Through A High Efficiency Multiple Cyclone Collector, And A Baghouse Dust Collector.

Kiln Number 2, 8.5' Diameter By 298.5' Long Rotary Kiln, 95 MMBtu/Hr Maximum Heat Input, Fuel Oil And/Or Natural Gas Fired. Kiln Vented Through A High Efficiency Multiple Cyclone Collector, And A Baghouse Dust Collector.

Kiln Number 3, 9' Diameter By 250' Long Rotary Kiln, 115 MMBtu/Hr Maximum Heat Input, Fuel Oil And/Or Natural Gas Fired. Kiln Vented Through A High Efficiency Multiple Cyclone Collector, And A Baghouse Dust Collector.

Kiln Number 4, Multiple Hearth Kiln, 20' Diameter, 12 Hearth, Natural Gas Fired. Kiln Vented Through A High Efficiency Multiple Cyclone Collector, And A Baghouse Dust Collector.

9. Steam Boiler, 2.7 MMBtu/Hr Maximum Heat Input, Natural Gas Fired With Fuel Oil Standby.

10. Ancillary Equipment:

2,000 Gallon Aboveground Gasoline Storage Tank With Phase I And Phase II Vapor Recovery.

Abrasive Blasting Equipment.

Paint Spray Operation.

Portable Two Deck Screen.

Portable 225 Bhp Diesel Engine Pump Set.

FEDERALLY ENFORCEABLE EMISSION LIMITS AND STANDARDS

1. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three (3) minutes in any one (1) hour which is as dark or darker than Ringelmann 1 or equivalent 20% opacity. [District Rule 400]

2. Particulate matter shall not exceed 0.15 grains per standard dry cubic foot in any exhaust stream, except stationary internal combustion engines. [District Rule 403]
3. Particulate matter from any exhaust stream (except stationary internal combustion engines) shall not exceed the lesser of 40 pounds per hour or the pound per hour limit established by the following mass emission limit equation [District Rule 403]:
$$E = 4.10 P^{0.67}$$
where:
E = rate of emission in pounds per hour
P = process weight rate in tons per hour
4. Sulfur compounds calculated as sulfur dioxide (SO₂) shall not exceed 0.2 percent by volume in any exhaust stream. [District Rule 404]
5. The sulfur content on any fuel oil used at the facility shall not exceed 0.5 percent by weight. [District Rule 412]
6. The sulfur content on any gaseous fuel used at the facility shall not contain sulfur compounds, calculated as hydrogen sulfide at standard conditions, in excess of 50 grains per 100 cubic feet. [District Rule 412]
7. No more than 40 pounds per day of Volatile Organic Compounds shall be discharged from any permit unit using or applying any solvent. [District Rule 416]
8. Lhoist North America's gasoline storage tank shall be equipped with a permanent submerged fill pipe and a Phase I vapor recovery system which has been certified by the California Air Resources Board. [District Rule 418]
9. Lhoist North America shall operate a Phase II vapor recovery system on the Gasoline Storage Tank which has been certified by the California Air Resources Board. [District Rule 1002]
10. Lhoist North America shall limit emissions of volatile organic compounds from the use of architectural coatings pursuant to the requirements of District Rule 426. [District Rule 426]
11. Lhoist North America shall limit emissions of volatile organic compounds during solvent cleaning and degreasing operations pursuant to the requirements of District Rule 433. [District Rule 433]
12. If total combined usage of coatings applied to metal parts and products, as defined by District Rule 434, equals or exceeds 55 gallons per year, each coating used for metal parts and products must not exceed the following volatile organic compound content limits [District Rule 434]:

| <u>Coating Category</u> | VOC Content Limit, as Applied | |
|--------------------------|-------------------------------|----------------|
| | <u>grams/liter</u> | <u>lbs/gal</u> |
| Pretreatment Wash Primer | 780 | 6.5 |
| All Other Coatings | 420 | 3.5 |

13. Materials processed by the Portable Two Deck Screen, the White Rock Sorting Station, and the Wet Slurry Processing System of the Heavy Media Separation System shall contain sufficient natural or added moisture as necessary such that no emissions are discharged from these operations which exhibit greater than 10% opacity, except where material is being transferred to a stockpile. [40 CFR Part 60, Subpart OOO]
14. No emissions shall be discharged from the Dolomite Sizing Facility (DSF) Crushing Systems Telescopic Bulk Loading Spout, the DSF Sacking Systems Supersacking Station and Smurfit-Stone Model 787 No. 4 Sacker, and the Lime Plant Crushing Storage and Sacking Facilities' SuperSacker Station #2 which exhibit greater than 10% opacity. [40 CFR Part 60, Subpart OOO]
15. Emissions from the Dolomite Sizing Facility (DSF) Crushing Systems' DCL Model VM280 Ventilation Module, the DSF Sacking Systems' DC-4 Dust Collection System, and the Lime Plant Crushing Storage and Sacking Facilities' Industrial Clean Air Dust Collector shall not [40 CFR Part 60, Subpart OOO]:
 - a) contain particulate matter in excess of 0.05 g/dscm, and
 - b) exhibit greater than 7 percent opacity.
16. Upon detection of an excursion as defined in condition number 29, Lhoist North America shall restore the emissions unit to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. [40 CFR Part 64]
17. Lhoist North America shall submit a Compliance Assurance Monitoring Quality Improvement Plan (QIP) to the District as specified in 40 CFR §64.8 if the accumulation of excursions monitored under condition number 29 exceed 5 percent of the pollutant-specific emissions unit's operating time for a reporting period. [40 CFR Part 64]
18. Should the facility, as defined in 40 CFR §68.3 become subject to Part 68, then Lhoist North America shall submit a risk management plan (RMP) by the date specified in 40 CFR §68.10. Once subject to Part 68, Lhoist North America shall certify compliance with these requirements as part of the annual compliance certification required by 40 CFR Part 70 and this permit. [40 CFR Part 68]
19. Lhoist North America shall comply with the requirements of 40 CFR Part 82 - Protection of Stratospheric Ozone. [40 CFR Part 82]

TESTING REQUIREMENTS AND PROCEDURES

20. Lhoist North America shall conduct testing semi-annually, in accordance with the methodology contained in EPA Method 22 with the exception that only one observation is required for all non-point sources. This testing will be the basis for determining compliance with condition number 1.

If no emissions are observed utilizing this modified Method 22, no further testing shall be required.

If emissions are observed from any non-point source and that non-point source is not operating under breakdown condition as defined in and allowed for in the District Rule 214 (Adopted 9/1/1974), Lhoist North America shall conduct testing on that non-point source within 24 hours of the modified Method 22 testing in accordance with the methodology contained in EPA Method 9 and the averaging/aggregating period contained in District Rule 400 to verify compliance with condition number 1 for that non-point source. [District Rule 218]

21. Lhoist North America shall conduct testing on a monthly basis in accordance with the methodology contained in EPA Method 22 with the exception that only one observation is required for all point sources. This testing will be the basis for determining compliance with condition numbers 1, 2, 3, 13, 14 and 15.

If no emissions are observed utilizing this modified Method 22, no further testing shall be required.

If emissions are observed from any point source and that point source is not operating under breakdown condition as defined in and allowed for in District Rule 214 (Adopted 9/1/1974), Lhoist North America shall conduct testing on that point source [District Rule 218]:

- 1) within 24 hours of the modified Method 22 testing in accordance with the methodology contained in EPA Method 9 and the averaging/aggregating period contained in District Rule 400 to verify compliance with condition numbers 1, 13, 14, and 15b; and
 - 2) within 30 days of the modified Method 22 testing in accordance with EPA Method 5 or 5D to verify compliance with the requirements of condition numbers 2, 3, and 15a.
22. No testing is specified for the (Rule 404) sulfur concentration limit in condition number 4. The fuel burning equipment is assumed to be in compliance with this sulfur concentration limit based upon the engineering calculations contained in the evaluation report. If testing is conducted for condition number 4, Lhoist North America should conduct testing in accordance with the methodology contained in EPA Method 6. [District Rule 218]
23. No testing is specified for the (Rule 412) fuel sulfur content limit in condition number 5 as compliance with this condition will be verified by monthly fuel sulfur content reports to be provided by the fuel supplier. If testing is conducted for condition number 5, Lhoist North America should conduct testing in accordance with ASTM D1552-83, ASTM D1266-87 or ASTM D2622-87. [District Rule 218]
24. No testing is specified for the sulfur content of gaseous fuels as long as the only gaseous fuel fired is pipeline quality natural gas. If the facility fires other gaseous fuels, Lhoist North America shall conduct

testing of all gaseous fuel deliveries in accordance with ASTM D 1072-80, ASTM D 3031-81, ASTM D 3246-81 or SCAQMD Method 307-91 to verify compliance with condition number 6. Lhoist North America shall furnish the District written results of the test prior to firing the gaseous fuel, but in no case later than thirty (30) days of completion. [District Rule 218]

MONITORING AND RECORD KEEPING REQUIREMENTS

25. Lhoist North America shall maintain the monthly fuel sulfur content reports to verify compliance with condition 5. [District Rule 218]
26. Lhoist North America shall maintain daily records to document compliance with condition number 7. [District Rule 416]
27. Lhoist North America shall maintain records showing the quantity of all gasoline delivered to the gasoline storage tanks. [District Rule 418]
28. Lhoist North America shall maintain a monthly log of the facility-wide total volume of make-up solvent used, and waste solvent disposed of or recycled, for all cleaning devices using volatile organic compounds for solvent cleaning and degreasing. [District Rule 433]

The record keeping provisions of this condition do not apply to remote reservoir cold cleaners which are serviced by an independent contractor. For such remote cold cleaners, evidence of service shall be maintained.

29. Lhoist North America shall maintain the following compliance assurance monitoring as specified below [40 CFR Part 64]:
 - a) The pressure drop across the kiln baghouse for Kiln Number 1 shall be monitored and recorded at least once per day on any day that Kiln number 1 is operating. Excursions from the monitoring parameters are defined as a pressure drop less than 0.25 inches or a pressure drop greater than 3.0 inches. A magnehelic gauge or pressure transducer will be utilized for the monitoring.
 - b) The pressure drop across the kiln baghouse for Kiln Number 2 shall be monitored and recorded at least once per day on any day that Kiln Number 2 is operating. Excursions from the monitoring parameters are defined as a pressure drop less than 0.25 inches or a pressure drop greater than 3.0 inches. A magnehelic gauge or pressure transducer will be utilized for the monitoring.
 - c) The pressure drop across the kiln baghouse for Kiln Number 3 shall be monitored and recorded at least once per day on any day that Kiln Number 3 is operating. Excursions from the monitoring parameters are defined as a pressure drop less than 0.25 inches or a pressure drop greater than 3.0 inches. A magnehelic gauge or pressure transducer will be utilized for the monitoring.

30. As applicable Lhoist North America shall maintain the following general records of required monitoring information [District Rule 218]:
- A) the date and time of sampling or measurements;
 - B) the date(s) analyses were performed;
 - C) the company or entity that performed the analyses;
 - D) the analytical techniques or methods used;
 - E) the results of such analyses;
 - F) the operating conditions existing at the time of sampling or measurement; and
 - G) the records of quality assurance for continuous monitoring systems (including, but not limited to quality control activities, audits, and calibration drift checks) and source testing methods.
31. Lhoist North America shall maintain records on the occurrence and duration of any startup or shutdown resulting from a malfunction in the operation of the control equipment under this permit. [District Rule 218]
32. Lhoist North America shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring, sample collection, measurement, report, and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [District Rule 218]

REPORTING REQUIREMENTS

33. Lhoist North America shall report breakdowns which results in the inability to comply with any emission standard or requirement contained on this permit to the Air Pollution Control Officer (APCO) within one hour of the occurrence; this one hour period may be extended up to six hours for good cause by the APCO. The APCO may elect to take no enforcement action if Lhoist North America demonstrates to the APCO's satisfaction that a breakdown condition exists.

The estimated time for repair of the breakdown shall be supplied to the APCO within twenty-four (24) hours of the occurrence, and a written report shall be supplied to the APCO within five (5) days after the occurrence has been corrected. This report shall include at a minimum [District Rule 214 Adopted 9/1/1974]:

- A) a statement that the condition or failure has been corrected and the date of correction; and
 - B) a description of the reason(s) for the occurrence; and
 - C) a description of the corrective measures undertaken and/or to be undertaken to avoid such an occurrence in the future; and
 - D) an estimate of the emissions caused by the condition or failure.
34. If combined annual emissions from the entire facility are greater than 25 tons of either NO_x or VOC, Lhoist

North America shall submit an Emission Statement for each Permit to Operate and Authority to Construct in accordance with the mandatory provisions of Section 182(a)(3)(B)(ii) of the federal Clean Air Act. [District Rule 300, Section 4.4]

35. Lhoist North America shall submit semiannual monitoring reports to the District, in a District approved format, no later than August 15 for the period of January 1 through June 30 and no later than February 15 for the period of July 1 through December 31. [District Rule 218]
These monitoring reports shall include at a minimum:
- A) the time intervals, date and magnitude of excess emissions, nature and cause of the excess (if known), corrective actions and preventative measures adopted; and
 - B) the averaging period used for data reporting corresponding to the averaging period specified in the emission test period used to determine compliance with an emission standard for the pollutant in question; and
 - C) all information pertaining to any monitoring as required by the permit; and
 - D) a negative declaration specifying when no excess emissions occurred.
36. Lhoist North America shall submit an annual compliance certification report to the District and U.S. EPA, in a District approved format, no later than February 15 for the period of January 1 through December 31 of the preceding year. [District Rule 218]
- This report shall include a written statement from the responsible official which certifies the truth, accuracy, and completeness of the report and shall include at a minimum:
- A) identification of each term or condition of the permit that is the basis of the certification; and
 - B) the compliance status; and
 - C) whether compliance was continuous or intermittent; and
 - D) the method(s) used for determining the compliance status of the source, currently and over the reporting period.

GENERAL CONDITIONS

37. Lhoist North America shall comply with all conditions of this federal operating permit. Any noncompliance with a permit condition constitutes a violation of the Federal Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. [District Rule 218]
38. In an enforcement action, the fact that Lhoist North America would have to halt or reduce the permitted

activity in order to maintain compliance with the conditions of this permit is not a defense. [District Rule 218]

39. This permit may be modified, revoked, reopened and reissued, or terminated for cause as determined by the District. The filing of a request by Lhoist North America for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 218]
40. This permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. [District Rule 218]
41. Lhoist North America shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, Lhoist North America shall also furnish to the District copies of records required to be retained by this permit. [District Rule 218]
42. For applicable requirements that will become effective during the permit term, Lhoist North America shall meet such requirements on a timely basis unless a more detailed schedule is expressly required by the applicable requirement. [District Rule 218]
43. Any document submitted to the District pursuant to this permit shall contain certification by the responsible official of truth, accuracy and completeness. All certifications shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Lhoist North America shall promptly, upon discovery, report to the District a material error or omission in these records, reports, plans, or other documents. [District Rule 218]
44. Lhoist North America shall report any violation of any requirement contained in this permit to the District within 96 hours after such occurrence. The violation report shall include the time intervals, date and magnitude of excess emissions; nature and cause of the excess (if known), corrective actions and preventive measures adopted. [District Rule 218]
45. Upon any administrative or judicial challenge, all the emission limits, specific and general conditions, monitoring, record keeping, and reporting requirements of this permit, except those being challenged, remain valid and must be complied with. [District Rule 218]
46. For this federal operating permit to remain valid through the permit term of five years from the date of issuance, Lhoist North America shall pay an annual emission fee based upon the requirements of District Rule 308. [District Rule 218]
47. Lhoist North America shall have available at the facility at all times a copy of this federal operating permit. [District Rule 218]

48. For protection from enforcement action based upon an emergency, as defined in District Rule 218, the responsible official for Lhoist North America shall submit to the District relevant evidence which demonstrates [District Rule 218]:
- A) an emergency occurred; and
 - B) that Lhoist North America can identify the cause(s) of the emergency; and
 - C) that the facility was being properly operated at the time of the emergency; and
 - D) that all steps were taken to minimize the emissions resulting from the emergency; and
 - E) within two working days of the emergency event, Lhoist North America provided the District with a description of the emergency and any mitigating or corrective actions taken.
49. Upon presentation of credentials, Lhoist North America shall allow the District, the ARB, the EPA, or an authorized representative, to perform the following [District Rule 218]:
- A) enter upon the premises where the federal operating permit source is located or in which any records are required to be kept under the terms and conditions of this federal operating permit;
 - B) to have access to and copy any records required to be kept under the terms and conditions of this federal operating permit;
 - C) to inspect any equipment, operation, or process described or required in this federal operating permit; and,
 - D) to sample emissions from the source.
