



Plant Name: Syar Industries, Inc.
Synthetic Minor Operating Permit Condition
Condition No. 25294

Plant No. A2158

SYNTHETIC MINOR OPERATING PERMIT

Syar Industries, Inc.
2301 Napa-Vallejo Highway
Napa, CA 94588
Application #23532
Plant #A2158

This facility, Site #A2158, has a synthetic minor operating permit. This operating permit covers all permitted, exempt, and registered sources of regulated air pollutants existing at this facility as of the date of permit issuance.

The following permit conditions establish the quantifiable and practically enforceable permit terms to ensure that this facility is classified as a Synthetic Minor Facility under District Regulation 2, Rule 6, Major Facility Review, and ensure that it is not subject to the permitting requirements of Title V of the Federal Clean Air Act as amended in 1990 and 40 CFR Part 70. All applications submitted by the applicant and all modifications to the plant's equipment after issuance of the synthetic minor permit must be evaluated to ensure that the facility will not exceed the synthetic minor general limits below, and that sufficient monitoring, recordkeeping, and reporting requirements are imposed to ensure the enforceability of the limits.

Any revision to a condition establishing this facility's status as a Synthetic Minor Facility or any new permit term that would limit emissions of a new or modified source for the purpose of maintaining the facility as a synthetic minor must undergo the procedures specified by Regulation 2, Rule 6, section 423. The basis for the synthetic minor conditions is an emission limit of 95 tons per year for regulated air pollutants, 90,000 tons per year for greenhouse gases (on a CO₂-equivalent basis), an emission limit for a single hazardous air pollutant (HAP) of 9 tons per year, and an emission limit for a combination of hazardous air pollutants of 23 tons per year.

1. In no event shall the emissions from this site exceed any of the emission limits listed below.

NOx	95 tons/year
CO	95 tons/year
POC	95 tons/year
PM10	95 tons/year
SO ₂	95 tons/year
Any Single HAP	9 tons/year
Combination of HAPs	23 tons/year
CO _{2e}	90,000 tons/year

Syar Industries, Inc. has successfully demonstrated that the facility wide potential to emit POC, PM10, SO₂ and HAPs are below the Title V permitting emission thresholds. However, the potential to emit NOx, CO, and CO_{2e} are each above



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their respective Title V permitting thresholds. Therefore, additional monitoring is required for those pollutants under the synthetic minor operating permit. (Basis: Regulation 2-6-423)

2. The owner/operator shall demonstrate compliance with the emission limits for NO_x, CO, and CO₂e specified in part 1 by following the procedures outlined below for the sources indicated:

- a. S-26 Asphaltic Concrete Plant #1 and S-27 Asphaltic Plant #2: Unless otherwise approved by the BAAQMD, the owner/operator shall utilize the following emission factors for NO_x, CO, and CO₂e to calculate annual emissions for those pollutants. The natural gas consumption rates applied to the CO₂e emission factor shall be obtained from actual gas meter throughput. The hot mix asphalt throughput rate applied to the NO_x and CO emission factors shall be based upon facility production records.

NO _x	0.055 lb/ton of hot mix asphalt
CO	0.13 lb/ton of hot mix asphalt
CO ₂ e	117.1 lb/MM BTU

- b. S-65 Hot Oil Heater: Unless otherwise approved by the BAAQMD, the owner/operator shall utilize the following emission factors for NO_x, CO, and CO₂e to calculate annual emissions for those pollutants. The natural gas consumption rates applied to these emission factors shall be obtained from actual gas meter throughput. If a dedicated gas meter is not available for S-65 Hot Oil Heater, then the owner/operator can use an estimate of proportional usage relative to overall facility natural gas usage.

NO _x	0.1 lb/MM BTU
CO	0.0824 lb/MM BTU
CO ₂ e	117.1 lb/MM BTU

Emissions of NO_x, CO, and CO₂e from each source shall be calculated and recorded on a monthly basis. Annual emissions shall be summarized on a rolling 12-month basis. All records required by the SMOP shall be kept on site and be available for inspection by BAAQMD personnel for at least 5 years from the date that a record was made. (Basis: Regulation 2-6-423)

3. The owner/operator shall develop and maintain monitoring tables to clearly demonstrate compliance with the NO_x, CO, and CO₂e SMOP limits on a rolling 12-month basis beginning with the first calendar month after the issuance of the SMOP. All monitoring tables shall be updated as applicable when equipment is added to or removed from the facility. (Basis: Regulation 2-6-423)

End of Conditions