

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

EVALUATION REPORT

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

APPLICATION RECEIVED FROM:

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

APPLICATION PROCESSED BY:

Mike Sewell, Air Quality Engineer

APPROVED FOR RELEASE BY:



Greg Chee
Engineering Division Supervisor

SEP - 7 2012

Date

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Dated: September 6, 2012

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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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PROJECT DESCRIPTION

Lhoist's existing Title V permit (TV62-01) expires on December 31, 2012. This application is for renewal of Lhoist's Title V Permit on the required five-year renewal cycle.

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.

APPLICABLE FEDERAL REQUIREMENTS

Rule 200 - Permits Required
Rule 201 - Sources Not Requiring Permits
Rule 207 - Review of New or Modified Sources
Rule 214 - Breakdown Condition
Rule 218 - Title V: Federal Operating Permits
Rule 300 - District Fees (Emission Statement - Section 4.4)
Rule 308 - Title V: Federal Operating Permit Fees
Rule 400 - Visible Emissions
Rule 403 - Particulate Matter
Rule 404 - Sulfur Compounds and Nitrogen Oxides
Rule 412 - Sulfur Content of Fuels
Rule 416 - Solvents
Rule 417 - Storage of Organic Liquids
Rule 418 - Transfer of Gasoline into Stationary Storage Containers
Rule 426 - Architectural Coatings
Rule 429 - Applications of Nonarchitectural Coatings
Rule 433 - Organic Solvent Cleaning
Rule 434 - Coating of Metal Parts and Products
Rule 1002 - Transfer of Gasoline into Vehicle Fuel Tanks
40 CFR Part 60, Subpart A - New Source Performance Standards, General Provisions
40 CFR Part 60, Subpart Dc - Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units
40 CFR Part 60, Subpart HH - Standards of Performance for Lime Manufacturing Plants
40 CFR Part 60, Subpart OOO - Standards of Performance for Nonmetallic Mineral Processing Plants
40 CFR Part 60, Subpart UUU - Standards of Performance for Calciners and Dryers in Mineral Industries
40 CFR Part 63, Subpart AAAAA - National Emission Standard for Hazardous Air Pollutants from Lime Manufacturing
40 CFR Part 64 - Compliance Assurance Monitoring
40 CFR Part 68 - Risk Management Planning: Accidental Release Prevention (Section 112r)
40 CFR Part 82 - Protection of Stratospheric Ozone

COMPLIANCE DETERMINATION FOR FEDERAL REQUIREMENTS

Rule 200 - Permits Required

This facility has historically complied with the requirements of this rule and continued compliance is expected.

Rule 201 - Sources Not Requiring Permits

This rule identifies which equipment is exempt from District permitting requirements.

Rule 207 - Review of New or Modified Sources

This facility started production in 1942. All of the major equipment predates this rule and have not undergone New Source Review (NSR) permitting. Therefore, no requirements from this rule will be included on this permit.

Rule 214 - Breakdown Condition

This rule specifies conditions and procedures for breakdowns. A condition which incorporates these requirements will be included on the permit.

Rule 218 - Title V: Federal Operating Permits

This is the implementing regulation by which the District issues the federal Operating Permits. All requirements imposed by this rule will be included on the Title V permit.

Rule 300 (Emission Statement - Section 4.4)

Historically, the facility has been in compliance with the requirement to submit an *Emission Statement*. A condition will be included on the permit to ensure continued compliance.

Rule 308 - Title V: Federal Operating Permit Fees

This is the District's fee rule for Title V. Appropriate conditions will be included on the Title V permit to ensure compliance with the fee provisions contained in this rule.

Rule 400 - Visible Emissions

This rule is applicable to the emissions from the facility.

All sources exhausting through baghouse dust collectors, and cyclones and rotoclones in series are assumed to be in compliance with the requirements of this rule. This is based upon the efficiency of properly designed control equipment and the issuance of the local District permits. Prior to permit issuance, District staff verified that the equipment was properly designed and in compliance with the opacity requirement of this rule. In addition, annual compliance inspections for all permit units at the facility have shown the facility to be in compliance with the requirements of this rule.

Appropriate conditions will be included on the permit to ensure compliance with this rule.

Rule 403 - Particulate Matter

Rule 403 specifically exempts stationary internal combustion engines from its requirements. Therefore, with the exception of IC engines, the 0.15 grains per dry cubic foot emission standard is applicable to all stationary fuel fired equipment at the facility. In addition, with the exception of IC engines, the 0.15 grains per dry cubic foot emission standard and the process weight standards are applicable to all point sources at the facility.

All sources exhausting through baghouse dust collectors are assumed to be in compliance with these rule requirements based upon the efficiency of a properly designed baghouse dust collector and the issuance of the local District permits. Prior to permit issuance, District staff verified that the equipment was properly designed and in compliance with the grain loading and process weight requirements of this rule. In addition, source testing has shown compliance with the rule requirements. Based upon the existing District permits, the fact that the process has not changed (no increase in grain loading to the baghouse dust collectors) and the source testing data, this permit will only require particulate sampling of the baghouse dust collector exhaust upon the observation of visual emissions from the baghouse dust collector except during periods of process breakdowns or upsets as allowed for and reported under District Rule 214.

Appropriate conditions will be included on the permit to ensure compliance with the requirements of this rule.

Rule 404 - Sulfur Compounds and Nitrogen Oxides

This rule is applicable to the emissions from the facility.

Internal Combustion Sources (Diesel Engines) - Compliance with the 0.2% by volume (2000 ppmv) limit for SO₂ is assumed due to the following calculation based upon the AP-42 emission factor of 0.29 Lbs SO₂/MMBtu heat input.

Utilizing this emission factor and the F factor from EPA method 19, the SO₂ concentration for a diesel engine would equate to 186.6 ppmv $[(0.29 \text{ Lbs SO}_2/\text{MMBtu}) * ((\text{MM lbmoles air}) / (64.1 \text{ lbmole SO}_2)) * ((379 \text{ Ft}^3 \text{ Air}) / (\text{lbmole air})) / (9,190 \text{ SDCFM})] = 186.6 \text{ ppmv}$ This value is well below the 2000 ppmv SO₂ allowed in this rule. Therefore, no monitoring/testing or record keeping will be included on the permit to show compliance with the SO₂ limit for the diesel fired engines.

Compliance with the NO_x limit of 140 lb/hr from the diesel fired engines is assumed due to the following emission calculation based upon the AP-42 emission factors of 0.031 Lbs NO_x/Hp-hr. An emission rate of 140 Lbs/hr would equate to an engine of 4516 Hp $[(140 \text{ Lbs/hr}) / (0.031 \text{ Lbs NO}_x/\text{Hp-hr}) = 4516 \text{ Hp}]$. The largest diesel engine at the facility is 225 Bhp, and is not capable of exceeding the 140 lb hour NO_x limit. Therefore, no monitoring/testing or record keeping requirements will be included on the permit to show compliance with the 140 lb/hr NO_x limit for the diesel fired engines.

Compliance with the 0.2% by volume (2000 ppmv) limit for SO₂ for external combustion of natural gas is assumed due to the following calculation based upon the AP-42 emission factor of 0.6 lbs SO₂/MMCF combusted (Table 1.4-2 dated 1/95), which equates to 0.0006 lbs SO₂/MMBtu heat input. Utilizing this emission factor and the F factor from EPA method 19, the SO₂ concentration for external combustion of natural gas would equate to 0.41 ppmv $[(0.0006 \text{ lbs SO}_2/\text{MMBtu}) * ((\text{MM lbmoles air}) / (64.1 \text{ lbmole SO}_2)) * ((379 \text{ Ft}^3 \text{ Air}) / (\text{lbmole air})) / ((8,710 \text{ SDCFM}))] = 0.41 \text{ ppmv}$ This value is well below the 2000 ppmv SO₂ allowed in this rule. Therefore, no monitoring/testing or record keeping will be included on the permit to show compliance with the SO₂ limit for the external combustion of natural gas.

Compliance with the 0.2% by volume (2000 ppmv) limit for SO₂ for external combustion of residual oil number 6 is assumed due to the following calculation based upon the AP-42 emission factor of 157s lbs SO₂/1000 gallons (s indicates the weight % of sulfur in the fuel) of number 6 oil combusted (Table 1.3-2 dated 1/95), which equates to 0.513 lbs SO₂/MMBtu heat input based upon 0.5% sulfur content of the fuel as required by Rule 412. Utilizing this emission factor and the F factor from EPA method 19, the SO₂ concentration for external combustion of number 6 oil would equate to 330.1 ppmv $[(0.513 \text{ lbs SO}_2/\text{MMBtu}) * ((\text{MM lbmoles air}) / (64.1 \text{ lbmole SO}_2)) * ((379 \text{ Ft}^3 \text{ Air}) / (\text{lbmole air})) / ((9,190 \text{ SDCFM}))] = 330.1 \text{ ppmv}$ This value is well below the 2000 ppmv SO₂ allowed in this rule. Therefore, no monitoring/testing or record keeping will be included on the permit to show compliance with the SO₂ limit for the external combustion of number 6 oil.

The 140 pound per hour NO_x limit for any new or expanded combustion unit is not applicable to the kilns at the facility as all of the kilns facility predate this rule and have not been expanded. Therefore, no NO_x requirement(s) from this rule will be included on this permit.

Rule 412 - Sulfur Content of Fuels

This rule which requires that the sulfur content of fuels combusted be less than 50 grains per 100 cubic feet for gaseous fuel and less than 0.5% by weight for liquid or solid fuel is applicable to this facility. Combustion of natural

gas assures compliance with the 50 grain limit and the Residual Oil Number 6 is supplied to the facility with a sulfur content below 0.5%.

Appropriate conditions will be included on the permit to ensure compliance with the requirements of this rule.

Rule 416 - Solvents

This rule has specific emission limits and record keeping requirements for volatile organic compound emissions. This rule applies to the paint spray operation at this facility. Historically, daily material usage records show that the facility has been operating below the 40 pound per day limit.

Appropriate conditions will be included on the permit to ensure compliance with the provisions of this rule.

Rule 417 - Storage of Organic Liquids

This rule requires vapor loss control devices on organic storage tanks greater than 150,000 liters (39,630 gallons) if the organic liquid stored has a true vapor pressure of 77.5 mm (1.5 psi) Hg at actual storage conditions.

The facility has three storage tanks which exceed 150,000 liters, one 100,000 gallons and two 400,000 gallons. However, the fuel oil stored has a true vapor pressure of 0.1 mm Hg. Therefore, the facility is not subject to the requirements of this rule.

Rule 418 - Transfer of Gasoline into Stationary Storage Containers

This rule requires that the gasoline storage tank have a submerged fill pipe and that Phase I Vapor recovery be utilized when filling the tank. The rule also requires specific record keeping regarding the quantity of fuel delivered to the facility. The facility is in compliance with the requirements of this rule.

Appropriate conditions will be included on the permit to ensure compliance with the requirements of this rule.

Rule 426 - Applications of Architectural Coatings

This rule is applicable to all applications of architectural coatings and limits the VOC content of these coatings. The facility is in compliance with the requirements of this rule.

An appropriate condition will be included on the permit to ensure compliance with the requirements of this rule.

Rule 429 - Applications of Nonarchitectural Coatings

This rule contains requirements on the application of nonarchitectural coatings, specifically that all coating operations be done in a complying enclosure unless specific rule criteria is met. During the permit issuance process for this equipment, it was determined that an enclosure would not be necessary as the site locations designated for painting were remote and would not have the ability to impact surrounding properties. Based upon this analysis and the allowances contained in Section 3.1.2 of the rule, the permit was issued for unconfined painting operations.

Therefore, the facility is in compliance with the requirements of this rule and no specific requirements will be included on the Title V permit.

Rule 433 - Organic Solvent Cleaning

This rule contains specific operational and record keeping requirements for solvent cleaning and degreasing operations.

Appropriate conditions will be included on the permit to ensure compliance with the provisions of this rule.

Rule 434 - Coating of Metal Parts and Products

This rule contains specific VOC content limits for coatings used on *metal parts and products*.

Appropriate conditions will be included on the permit to ensure compliance with the provisions of this rule.

Rule 1002 - Transfer of Gasoline into Vehicle Fuel Tanks

This rule contains specific requirements for the installation and operation of ARB Certified Vapor Recover (phase II) systems on gasoline dispensing facilities.

Appropriate conditions will be included on the permit to ensure compliance with requirements of this rule.

40 CFR Part 60, Subpart A - New Source Performance Standards, General Provisions

This facility is subject to the requirements of 60.7 (notification and record keeping), 60.8 (performance tests), 60.11 (compliance with standards and maintenance requirements), and 60.13 (monitoring requirements) because the Portable Two Deck Screen is subject to 40 CFR Part 60, Subpart OOO.

The District asserts that compliance with the conditions on the Title V permit shall be considered compliance with the monitoring, record keeping, and reporting requirements contained in 40 CFR Parts 60.7, 60.8 (with the exception of 60.8(b)), 60.11 (with the exception of 60.11(b) and 60.11(e)), and 60.13 (with the exception of 60.13(a), 60.13(d)(2), 60.13 (g), and 60.13(I)). The excepted sections are those for which the District has not received delegation (those which EPA will not delegate to States and Local Air Pollution Control Districts).

40 CFR Part 60, Subpart Dc - Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units

The steam boiler at this facility predates the requirements of this part. In addition, the steam boiler would not be subject to this part due to its heat input rating being less than 10 MMBtu/hour.

40 CFR Part 60, Subpart HH - Standards of Performance for Lime Manufacturing Plants

Each of the rotary lime kilns predate the requirements of this part (Kilns 1 and 2 were installed in 1942 while kiln 3 was installed in the 1960s). The rotary kilns have not undergone modification (as defined in 40 CFR §60.2) after May 3, 1977, and therefore are not subject to the requirements of this part.

40 CFR Part 60, Subpart OOO - Standards of Performance for Nonmetallic Mineral Processing Plants

The Portable Two Deck Screen, the White Rock Sorting Station, the Wet Slurry Processing System of the Heavy Media Separation System, the Dolomite Sizing Facility (DSF) Crushing Systems Telescopic Bulk Loading Spout and DCL Model VM280 Ventilation Module, the DSF Sacking Systems Supersacking Station, Smurfit-Stone Model 787 Sacker and DC-4 Dust Collection System, and the Lime Plant Crushing Storage and Sacking Facilities' SuperSacker Station #2 and Industrial Clean Air Dust Collector are subject to the requirements of this part.

The other nonmetallic mineral processing at the facility predates the requirements of this part and has not undergone reconstruction (as defined in this part) or modification (as defined in 40 CFR §60.2) after August 31, 1983.

Therefore, only the above listed equipment is subject to the requirements of this part. Appropriate conditions will be included on the permit to ensure compliance with the requirements of this subpart.

40 CFR Part 60, Subpart UUU - Standards of Performance for Calciners and Dryers in Mineral Industries

All of the kilns and dryers at this facility predate the requirements of this part and have not undergone reconstruction (as defined in this part) or modification (as defined in 40 CFR §60.2) after April 23, 1986. Therefore this facility is not subject to the requirements of this part.

40 CFR Part 61, Subpart M - National Emission Standard for Asbestos

This facility on an as needed basis is subject to Section 61.145 through 61.147 - standards for the demolition and renovation of asbestos. Historically, the facility has been in compliance with the requirements of these standards. An appropriate condition will be included on the permit to ensure compliance with these requirements.

40 CFR Part 63, Subpart AAAAA - National Emission Standard for Hazardous Air Pollutants from Lime Manufacturing

EPA Method 321 testing conducted at the facility on April 20, 2006 verified that the facility is an *Area Source* under the Lime Manufacturing NESHAP (MACT) based upon HCl emissions. The testing data was transmitted to the District on June 19, 2006, and the District responded that the source was in fact an *Area Source* in a November 6, 2006 letter.

No requirements from this MACT will be included on the permit as *Area Sources* are not subject to the MACT.

40 CFR Part 64 - Compliance Assurance Monitoring

Rotary kilns numbers 1, 2, and 3 are subject to the requirements of this part due to their potential to emit particulate matter and the use of baghouses to control particulate emissions.

Each of the kiln baghouses will be indirectly monitored for compliance with the PM emission limits by measuring the pressure drop across the baghouses. Baghouse design criteria, previous source tests, and operations data show that a pressure drop greater than 0.25 inches and less than 3.0 inches verifies compliance with the permitted PM limits. At least one data point for pressure drop across each baghouse will be collected on any day that the kiln that the baghouse serves is operated.

40 CFR Part 68 - Risk Management Planning: Accidental Release Prevention (Section 112r)

This facility is not subject to the requirements of this part. An appropriate condition will be included on the permit to ensure compliance with the Part 68 requirements if the facility were to become subject.

40 CFR Part 82 - Protection of Stratospheric Ozone

This facility is in compliance with the requirements of this part. An appropriate condition will be included on the permit to ensure compliance with these requirements.

CONDITIONS TO BE INCLUDED ON THE TITLE V PERMIT:

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>	<u>VOC Content Limit, as Applied</u>	
	<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.

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