



Permit to Operate 12208  
And  
Part 70 Minor Modification Permit 12208

Page 1 of 13

EQUIPMENT OWNER:

Celite Corporation

205129

EQUIPMENT OPERATOR:

Celite Corporation

EQUIPMENT LOCATION:

2500 Miguelito Rd, Lompoc

STATIONARY SOURCE/FACILITY:

Celite Corporation

SSID: 01735

FID: 00012

EQUIPMENT DESCRIPTION:

This permit authorizes the operations of bulk bins and storage silos, and associated baghouses. The equipment subject to this permit is listed in Attachment D at the end of this permit.

PROJECT/PROCESS DESCRIPTION:

Celite currently mines and processes diatomaceous earth (DE) at its Lompoc Plant. Celite operates four product lines (3, 5, 6, and 7 Systems) each with "wet end" and "dry end" processing. Wet diatomaceous earth crude is surface mined, crushed, milled and dried and/or calcined at high temperatures. The dried product is then transferred to bulk bins and then to the storage silos permitted under ATC 12208-02 for later bagging or bulk loading for shipment to distributors and customers. The bins and powder pumps are used to convey material to and from the eight storage silos. This Permit to Operate also authorizes an increase in permitted airflow through BH109A, BH109B, BH110A and BH110B to 1,500 scfm, and a removal of the lower limit to the pressure differential across all the baghouses in this permit. The Celite Facility ID is 00012 and the Stationary Source ID is 1735.

CONDITIONS:

**9.A Standard Administrative Conditions**

**A.1 Compliance with Permit Conditions**

- (a) The permittee shall comply with all permit conditions in Sections 9.A, 9.B and 9.C.
- (b) This permit does not convey property rights or exclusive privilege of any sort.
- (c) Any permit noncompliance constitutes a violation of the Clean Air Act and is grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application.
- (d) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (e) A pending permit action or notification of anticipated noncompliance does not stay any permit condition.
- (f) Within a reasonable time period, the permittee shall furnish any information requested by the Control Officer, in writing, for the purpose of determining:
  - (i) compliance with the permit, or
  - (ii) whether or not cause exists to modify, revoke and reissue, or terminate a permit or for an enforcement action. [Re: 40 CFR Part 70.6, APCD Rules 1303.D.1]
- (g) In the event that any condition herein is determined to be in conflict with any other condition contained herein, then, if principles of law do not provide to the contrary, the condition most protective of air quality and public health and safety shall prevail to the extent feasible.

**A.2 Emergency Provisions.** The permittee shall comply with the requirements of the APCD, Rule 505 (Upset/Breakdown rule) and/or APCD Rule 1303.F, whichever is applicable to the emergency situation. In order to maintain an affirmative defense under Rule 1303.F, the permittee shall provide the APCD, in writing, a “notice of emergency” within 2 days of the emergency. The “notice of emergency” shall contain the information/documentation listed in Sections (1) through (5) of Rule 1303.F. [Re: 40 CFR 70.6, APCD Rule 1303.F]

**A.3 Compliance Plan.**

- (a) The permittee shall comply with all federally-enforceable requirements that become applicable during the permit term, in a timely manner, as identified in the Compliance Plan.
- (b) For all applicable equipment, the permittee shall implement and comply with any specific compliance plan required under any federally-enforceable rules or standards. [Re: APCD Rule 1302.D.2]

- A.4 **Right of Entry.** The Regional Administrator of USEPA, the Control Officer, or their authorized representatives, upon the presentation of credentials, shall be permitted to enter upon the premises where a Part 70 Source is located or where records must be kept:
- (a) To inspect the stationary source, including monitoring and control equipment, work practices, operations, and emission-related activity;
  - (b) To inspect and duplicate, at reasonable times, records required by this Permit to Operate;
  - (c) To sample substances or monitor emissions from the source or assess other parameters to assure compliance with the permit or applicable requirements, at reasonable times. Monitoring of emissions can include source testing. [*Re: APCD Rule 1303.D.2*]
- A.5 **Payment of Fees.** The permittee shall reimburse the APCD for all its Part 70 permit processing and compliance expenses for the stationary source on a timely basis. Failure to reimburse on a timely basis shall be a violation of this permit and of applicable requirements and can result in forfeiture of the Part 70 permit. Operation without a Part 70 permit subjects the source to potential enforcement action by the APCD and the USEPA pursuant to section 502(a) of the Clean Air Act. [*Re: APCD Rules 1303.D.1 and 1304.D.11, 40 CFR 70.6*]
- A.6 **Prompt Reporting of Deviations:** The permittee shall submit a written report to the APCD documenting each and every deviation from the requirements of this permit or any applicable federal requirements within 7 days after discovery of the violation, but not later than 180-days after the date of occurrence. The report shall clearly document 1) the probable cause and extent of the deviation, 2) equipment involved, 3) the quantity of excess pollutant emissions, if any, and 4) actions taken to correct the deviation. The requirements of this condition shall not apply to deviations reported to APCD in accordance with Rule 505. *Breakdown Conditions*, or Rule 1303.F *Emergency Provisions*. [APCD Rule 1303.D.1, 40 CFR 70.6(a) (3)]
- A.7 **Reporting Requirements/Compliance Certification:** The permittee shall submit compliance certification reports to the USEPA and the Control Officer every six months. These reports shall be submitted on APCD forms and shall identify each applicable requirement/condition of the permit, the compliance status with each requirement/condition, the monitoring methods used to determine compliance, whether the compliance was continuous or intermittent, and include detailed information on the occurrence and correction of any deviations (excluding emergency upsets) from permit requirement. The reporting periods shall be each half of the calendar year, e.g., January through June for the first half of the year. These reports shall be submitted by September 1 and March 1, respectively, each year. Supporting monitoring data shall be submitted in accordance with the “Semi-Annual Monitoring/Compliance Verification Report” condition in section 9.C. The permittee shall include a written statement from the responsible official, which certifies the truth, accuracy, and completeness of the reports. [*Re: APCD Rules 1303.D.1, 1302.D.3, 1303.2.c*]

A.8 **Federally-Enforceable Conditions.** Each federally-enforceable condition in this permit shall be enforceable by the USEPA and members of the public. None of the conditions in the APCD-only enforceable section of this permit are federally-enforceable or subject to the public/USEPA review. [*Re: CAAA, § 502(b)(6), 40 CFR 70.6*]

A.9 **Recordkeeping Requirements.** Records of required monitoring information shall include the following:

- (a) The date, place as defined in the permit, 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; and
- (f) The operating conditions as existing at the time of sampling or measurement;

The records (electronic or hard copy), as well as all supporting information including calibration and maintenance records, shall be maintained for a minimum of five (5) years from date of initial entry by the permittee and shall be made available to the APCD upon request. [*Re: APCD Rule 1303.D.1.f, 40CFR70.6(a)(3)(ii)(A)*]

A.10 **Conditions for Permit Reopening.** The permit shall be reopened and revised for cause under any of the following circumstances:

- (a) Additional Requirements: If additional applicable requirements (e.g., NSPS or MACT) become applicable to the source which has an unexpired permit term of three (3) or more years, the permit shall be reopened. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. However, no such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended. All such re-openings shall be initiated only after a 30-day notice of intent to reopen the permit has been provided to the permittee, except that a shorter notice may be given in case of an emergency.
- (b) Inaccurate Permit Provisions: If the APCD or the USEPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit, the permit shall be reopened. Such re-openings shall be made as soon as practicable.
- (c) Applicable Requirement: If the APCD or the USEPA determines that the permit must be revised or revoked to assure compliance with any applicable requirement including a federally-enforceable requirement, the permit shall be reopened. Such re-openings shall be made as soon as practicable.

Administrative procedures to reopen and revise/revoke/reissue a permit shall follow the same procedures as apply to initial permit issuance. Re-openings shall affect only those parts of the permit for which cause to reopen exists.

If a permit is reopened, the expiration date does not change. Thus, if the permit is reopened, and revised, then it will be reissued with the expiration date applicable to the re-opened permit. [*Re: 40 CFR 70.7, 40 CFR 70.6*]

**9.B. Generic Conditions**

**B.1 Circumvention (Rule 301):** A person shall not build, erect, install, or use any article, machine, equipment or other contrivance, the use of which, without resulting in a reduction in the total release of air contaminants to the atmosphere, reduces or conceals an emission which would otherwise constitute a violation of Division 26 (Air Resources) of the Health and Safety Code of the State of California or of these Rules and Regulations. This Rule shall not apply to cases in which the only violation involved is of Section 41700 of the Health and Safety Code of the State of California, or of APCD Rule 303. [*Re: APCD Rule 301*]

**B.2 Visible Emissions (Rule 302).** Celite shall not discharge into the atmosphere from any single source of emission any air contaminants for a period or periods aggregating more than three minutes in any one hour which is:

- (a) As dark or darker in shade as that designated as No. 1 on the Ringlemann Chart, as published by the United States Bureau of Mines, or
- (b) Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subsection B.2(a) above.

Compliance shall be determined by visible emission evaluations by certified observers. All visible emission observation and inspection sheets and records shall be maintained consistent with the recordkeeping condition of this permit. [*Ref: APCD Rule 302*].

**B.3 Nuisance (Rule 303):** No pollutant emissions from any source at the permittee shall create nuisance conditions. Operations shall not endanger health, safety or comfort, nor shall they damage any property or business. [*Re: APCD Rule 303*]

**B.4 PM Concentration – Northern Zone (Rule 304).** Celite shall not discharge into the atmosphere, from any source, particulate matter in excess of 0.3 grain per cubic foot of gas as standard conditions. [*Ref: APCD Rule 304*].

**9.C Requirements and Equipment Specific Conditions**

This section includes non-generic federally enforceable conditions including emissions and operation limits, monitoring and recordkeeping and reporting for each specific equipment group. This section may also contain other non-generic requirements.

**C.1 Emissions Limitations.** Mass emissions and concentrations of PM and PM<sub>10</sub> from the exhaust stack of each baghouse permitted herein shall not exceed the limits listed in Tables 3 and 4 of this permit. Compliance shall be based on the operational, monitoring, recordkeeping and reporting conditions of this permit.

a. Baghouse Stack Concentration (BACT): The particulate concentration in the exhaust from each baghouse permitted herein shall not exceed 0.005 gr/dscf.

**C.2 Operating Limitations.** The following operating limitations shall apply to all baghouses permitted herein:

a. Baghouse Stack Flow Rate: The maximum exhaust flow rate shall not exceed the air flow listed in Table 5 of this permit;

b. Baghouse Pressure Drop: The baghouse pressure drop of each baghouse shall not exceed six inches of water (gauge pressure).

c. Visible Emissions: Baghouse stack emissions shall not exceed 7% opacity (NSPS Subpart OOO).

The following operating limits shall apply to the product silos (Dev Nos 109214 and 109216 through 109222) and hose station equipment (Dev Nos 109231 and 109232):

d. Enclosed Equipment: Product silos, bulk bins and inlet and outlet hose stations and all product transport lines and transfer points serving this equipment shall be closed to the atmosphere and all particulates vented through a product silo baghouse.

e. Visible Emissions: Fugitive emissions from the silo area equipment shall not exceed 10% opacity or no visible fugitive emissions shall be emitted from a building enclosing any of these operations. (NSPS Subpart OOO)

**C.3 Monitoring.** The following monitoring requirements shall apply to all baghouses permitted herein: Each baghouse shall be equipped with APCD-approved pressure monitoring instrumentation with a range, accuracy, and resolution capable of monitoring the pressure drop across each baghouse permitted herein, in inches H<sub>2</sub>O. Each meter display shall be accessible from ground level;

a. Celite shall obtain a daily reading of the pressure drop when each baghouse is operational. If the pressure drop of any baghouse exceeds six inches (gauge pressure), immediate corrective action (permit condition 6) shall be taken to bring the range below six inches.

- b. Celite shall perform an initial Method 9 NSPS OOO opacity inspection on the following baghouses within one week of initiating operation Dev. No.s 110192, 110641, 110642, 110649, 110650 and 110651: Celite shall notify the APCD (Project Manager) within 24 hours of initial operation of each baghouse

The following operating limits shall apply to the product silos (Dev Nos 109214 and 109216 through 109222) and hose station equipment (Dev Nos 109231 and 109232):

- c. Once each quarter, Celite shall perform a fugitive visible emission inspection for a one-minute period on each product silo and hose station. If visible emissions are detected during any inspection, then a USEPA Method 9 visible emission evaluation (VEE) shall immediately be performed for a six-minute period. Celite staff certified in VEE shall perform the VEE and maintain logs in accordance with EPA Method 9.

C.4 **Compliance Assurance Monitoring (CAM).** The baghouses contained within this permit are subject to 40 CFR Part 64 CAM requirements, and the conditions below:

- (a) Celite shall implement all requirements of the APCD-approved CAM Plan. This plan is hereby incorporated by reference as an enforceable part of this permit. Recordkeeping and reporting shall be consistent with the CAM Plan requirements as summarized below.
- (b) Visible Emissions: Celite shall conduct daily observations for visible emissions and quarterly EPA Method 9 visible emissions observations. An excursion for visible emissions is defined as any daily observation of visible emissions.
- (c) Differential Pressure: Celite shall measure and record the differential pressure range of each baghouse on a daily basis. The averaging time for this measurement will be one minute. An excursion is defined as any daily pressure drop reading outside the permitted limits.
- (d) Quality Improvement Plan: Celite shall submit for APCD-approval a Quality Improvement Plan (QIP) consistent with 40 CFR 64 section 64.8(b) within 30-days of notification by the APCD that a QIP threshold has been exceeded. A QIP threshold is defined as a number of exceedances or "excursions" (within a continuous 12-month period) of a monitoring parameter limit, per emission unit, above which triggers submittal and implementation of a QIP for the affected unit. The QIP threshold for all CAM monitoring parameters is five (5), e.g. after a specific baghouse fails five visible emissions observations and/or inspections, submittal of a QIP is required.

C.5 **Recordkeeping.** For any condition that requires for its effective enforcement, inspection of facility records or equipment by the APCD or its agents, Celite shall make such records available or provide access to such equipment upon notice from the APCD. Access to facilities shall mean access consistent with the California Health and Safety Code Section 41510 and Clean Air Act Section 114(a). At a minimum, the following records (electronic or manual) shall be maintained by the permittee and shall be made available to the APCD upon request:

Permit to Operate No. 12208

Page 8 of 13

- a. Celite shall record whether or not daily visible emissions are present or the date and initials of a responsible person when the baghouse is non-operational (per condition 6.a).
- b. Daily pressure drop across the baghouse, when operational;
- c. For all baghouse malfunction, maintenance, pressure drop and visible emission correction activities:
  - i) Date of malfunction, preventive maintenance activity or pressure drop correction activity;
  - ii) Description of activity;
  - iii) Date and time taken to remedy the malfunction or perform maintenance;
  - iv) If equipment is shut down because the visible emissions could not be eliminated within 24 hours, the date and time of shutdown of the equipment the affected baghouse serves, and the date and time of startup of the equipment served.
- d. For each quarterly Method 9 opacity reading required by Condition 6.b: the name and most recent Method 9 certification date of the reader, the name of the baghouse, the date and time of the reading, and the reading.
- e. For each quarterly fugitive opacity reading required by Condition 3: the date and time of the reading, and whether visible emissions were observed and if a Method 9 was performed, the name and most recent Method 9 certification date of the reader, the name of the baghouse, the date and time of the reading, and the reading.

These records are required to verify compliance with the conditions of this permit. The Control Officer may require a revised recordkeeping format if the format used is inadequate to determine compliance. The records shall be kept on file at the Celite Lompoc facility for at least five years.

**C.6 Reporting.** On a semi-annual basis, a report detailing the previous six month's activities shall be provided to the APCD. The report must list all the data listed as follows:

- a. Visible Emission Observations. Results of daily visible emission observation for which visible emissions were detected for all baghouses. The log should specify whether the baghouse is subject to the requirements of the CAM Plan.
- b. Visible Emission Inspections (Method 9). For all baghouses, the results of the quarterly visible emission inspections obtained by the use of USEPA Method 9, which include the date and time of reading, name of reader, most recent Method 9 certification date of reader, baghouse name, individual interval readings required by Method 9, and the final reading.
- c. Fugitive Visible Emission Inspections. For fugitive emissions, the results of the quarterly inspection which include the date and time of reading, name of reader, equipment item and whether fugitive emissions were observed. If a Method 9 was performed, the results of the quarterly visible emission inspections obtained by the use of USEPA Method 9, which include the date and time of reading, name of reader, most recent Method 9 certification date of reader, baghouse name, individual interval readings required by Method 9, and the final reading.

- d. Pressure Drop for Baghouses. The days the pressure drop is outside the range, the range, the actual readings and all corrective actions implemented.
- e. Hours of Operation. On a monthly basis, the operating hours for each baghouse.

**C.7 Baghouse Maintenance and Inspection.** Celite shall comply with the following baghouse maintenance and inspection practices:

- a. Visible Emission Observations: For all baghouses, permittee shall observe baghouses daily when operational. On any day a baghouse is not operating, Celite shall have a responsible person make a written entry in the applicable baghouse operation log noting that the baghouse was not in operation. The responsible person shall certify the entry by initialing or signing their name next to the entry. Celite shall perform a visual inspection of each baghouse and baghouse exhaust once per day. If visible emissions are observed during the daily observation, corrective action shall be immediately implemented. If visible emissions are not eliminated within 24 hours, Celite shall shut down the equipment controlled by the baghouse until corrective action that eliminates visible emissions is completed or obtain a variance from the APCD Hearing Board.
- b. Visible Emissions Inspections (Method 9): Once each calendar quarter, permittee shall use EPA Method 9 performed by a certified observer to obtain a reading of visible emissions from the stack of each baghouse. The Method 9 readings shall be taken in calendar quarters during which the baghouse operated and shall be taken when the baghouse is operating due to operation of some or all of the equipment it serves.

If five (5) consecutive quarters of Method 9 inspections of any one enclosed baghouse results in 0% opacity, Celite may submit a request in writing to the APCD to reduce the frequency of Method 9 inspections to semi-annual for that baghouse. Celite shall include documentation supporting the request to reduce the inspection frequency for each baghouse. Upon APCD written approval, the semi-annual inspection frequency becomes effective.

- c. Each baghouse shall be maintained consistently with the APCD-approved baghouse inspection and maintenance plan (approved 03/11/2008) and any subsequent updates approved by the APCD. Celite shall make the plan available for inspector use during inspection.
- d. For a period of 3 months following the issuance of this permit, Celite shall submit baghouse continuous pressure drop and daily visible emissions observation data to the APCD on a weekly basis for each day of operation. If determined necessary by the APCD based upon this data, Celite shall modify the *Baghouse Inspection and Maintenance Plan (I & M Plan)* to include enhanced monitoring or maintenance as specified by the APCD. Celite shall submit a revised *Baghouse I & M Plan* for APCD review and approval within 10 days of notification by the APCD.

**C.8 Source Testing.** The following source testing provisions shall apply:

The permittee shall conduct source testing of the baghouses consistent with the frequency stated in the following table so that each baghouse is tested at least once triennially (i.e., every three years). The test anniversary date shall be April:

Group Number	Test Frequency	Celite ID	APCD Device Number
Silo Area Group 1	At least two Group 1 baghouses shall be tested every year	BH101, BH102, BH103, BH104, BH105, BH106, BH107, BH108	110191, 110192, 110193, 110194, 110195, 110196, 110197, 110198
Silo Area Group 2	At least one Group 2 baghouse shall be tested every year	BH109A, BH109B, BH110A, BH110B	110649, 110650, 110651, 110652
Silo Area Group 3	No more than one Group 3 baghouse shall be tested per year	BH925A, BH925B	110641, 110642

The permittee shall submit a written source test plan for the annual baghouse testing to the APCD for approval at least thirty (30) days prior to initiation of source testing. The source test plan shall identify the baghouses selected for testing that year. The source test plan shall be prepared consistent with the APCD's Source Test Procedures Manual (revised May 1990 and all subsequent revisions). The Plan shall detail how the baghouse stack tests will be conducted under worst case loading conditions, (e.g., during the transfer of product from system bulk bins into the product silo or bulk bins via the inlet hose station system.) Written APCD approval of this plan shall be obtained prior to commencement of source testing. The APCD shall be notified at least ten (10) calendar days prior to the start of source testing activity to arrange for a mutually agreeable source test date when APCD personnel may observe the test.

Source test results shall be submitted to the APCD within forty-five (45) calendar days following the date of source test completion and shall be consistent with the requirements approved within the source test plan. Source test results shall document the permittee's compliance status with the permitted emission limits. If test results indicate non-compliance with the PM emission limits, the APCD may require an increased frequency of testing. The APCD will notify Celite in writing of a change in frequency of testing. All APCD costs associated with the review and approval of all plans and reports and the witnessing of tests shall be paid by the permittee as provided for by Rule 210.

A source test for an item of equipment shall be performed on the scheduled day of testing (the test day mutually agreed to) unless circumstances beyond the control of the operator prevent completion of the test on the scheduled day. Such circumstances include mechanical malfunction of the equipment to be tested, malfunction of the source test equipment, delays in source test contractor arrival and/or set-up, or unsafe conditions on site. Except in cases of an emergency, the operator shall seek and obtain APCD approval before deferring or discontinuing a scheduled test, or performing maintenance on the equipment item on the scheduled test day. If the test can not be completed on the scheduled day, then the test shall be rescheduled for another time with prior authorization by the APCD. Once the sample probe has been inserted into the exhaust stream of the equipment unit to be tested (or extraction of the sample has begun), the test shall proceed in accordance with the approved source test plan. In no case shall a test run be aborted except in the case of an emergency or unless approval is first obtained from the APCD. Failing to perform the

Permit to Operate No. 12208

Page 11 of 13

source test of an equipment item on the scheduled test day without a valid reason and without APCD's authorization shall constitute a violation of this permit. If a test is postponed due to an emergency, written documentation of the emergency event shall be submitted to the APCD by the close of the business day following the scheduled test day.

The timelines listed above may be extended for good cause provided a written request is submitted to the APCD at least three (3) days in advance of the deadline, and approval for the extension is granted by the APCD.

- C.9 **Testing Facilities.** The permittee shall provide testing facilities at each baghouse in accordance with Rule 205.E and as specified below:
- a. Sampling stack and ports adequate for test methods applicable to the equipment being tested.
  - b. Safe sampling platform(s).
  - c. Safe access to sampling platform(s).
  - d. Utilities for sampling and testing equipment.
- C.10 **Documents Incorporated by Reference.** The documents listed below, including any APCD approved updates thereof, are incorporated herein by reference and shall have the full force and effect of a permit condition for this permit. These documents shall be implemented for the life of the Project and shall be made available to APCD inspection staff upon request.
- a. Baghouse Inspection and Maintenance Plan (approved March 11, 2008)
  - b. Compliance Assurance Monitoring Plan (approved March 11, 2008)
  - c. Source test Protocol Document for Emission Testing at Celite Corporation (approved April 11, 2008)
- C.11 **Modification Requirements.** Prior to making any modifications to the packing stations permitted herein, including tie-ins to any other processing equipment or processing lines at the facility, Celite shall obtain a new Authority to Construct (ATC) permit or modification to this PTO 12208.
- C.12 **Grounds for Revocation.** Failure to abide by and faithfully comply with this permit or any Rule, Order, or Regulation may constitute grounds for the APCO to petition for permit revocation pursuant to California Health & Safety Code Section 42307 *et seq.*
- C.13 **Consistency with Analysis.** Operation under this permit shall be conducted consistent with all data, specifications and assumptions included with the application and supplements thereof (as documented in the APCD's project file) and the APCD's analyses under which this permit is issued as documented in the Permit Evaluation prepared for and issued with the permit.
- C.14 **Equipment Maintenance.** The equipment listed in this permit shall be properly maintained and kept in good condition at all times. The equipment manufacturer's maintenance manual, maintenance procedures and/or maintenance checklists (if any) shall be kept on site.

Permit to Operate No. 12208

Page 12 of 13

- C.15 **Compliance.** Nothing contained within this permit shall be construed as allowing the violation of any local, state or federal rules, regulations, air quality standards or increments.
- C.16 **Severability.** In the event that any condition herein is determined to be invalid, all other conditions shall remain in force.
- C.17 **Conflict Between Permits.** The requirements or limits that are more protective of air quality shall apply if any conflict arises between the requirements and limits of this permit and any other permitting actions associated with the equipment permitted herein.
- C.18 **Access to Records and Facilities.** As to any condition that requires for its effective enforcement the inspection of records or facilities by the APCD or its agents, the permittee shall make such records available or provide access to such facilities upon notice from the APCD. Access shall mean access consistent with California Health and Safety Code Section 41510 and Clean Air Act Section 114A.
- C.19 **Emission Factor Revisions.** The APCD may update the emission factors for any calculation based on USEPA AP-42 or APCD emission factors at the next permit modification or permit reevaluation to account for USEPA and/or APCD revisions to the underlying emission factors.
- C.20 **Reimbursement of Costs.** All reasonable expenses, as defined in APCD Rule 210, incurred by the APCD, APCD contractors, and legal counsel for the activities listed below that follow the issuance of this permit, including but not limited to permit condition implementation, compliance verification and emergency response, directly and necessarily related to enforcement of the permit shall be reimbursed by the permittee as required by Rule 210. Reimbursable activities include work involving: permitting, compliance, CEMS, modeling/AQIA, ambient air monitoring and air toxics.

**9.D APCD-Only Conditions**

The following section lists permit conditions that are not enforceable by the USEPA or the public. However, these conditions are enforceable by the APCD and the State of California. These conditions are issued pursuant to APCD Rule 206 (*Conditional Approval of Authority to Construct or Permit to Operate*), which states that the Control Officer may issue an operating permit subject to specified conditions. Permit conditions have been determined as being necessary for this permit to ensure that operation of the facility complies with all applicable local and state air quality rules, regulations and laws. Failure to comply with any condition specified pursuant to the provisions of Rule 206 shall be a violation of that rule, this permit, as well as any applicable section of the California Health & Safety Code.

**D.1 Permit Activation.** All aspects of this permit are enforceable by the APCD and the State of California upon the issuance date stamped below. The Part 70 aspects of this permit are not final until:

- (a) The USEPA has provided written comments to the APCD and these comments require no modification to this permit. The APCD will issue a letter stating that this permit is a final Part 70 permit. The effective date that this permit will be considered a final Part 70 permit will be the date stamped on the APCD's letter.
- (b) After the USEPA has provided the APCD written comments that require a modification to this permit, the APCD will modify this permit to address the USEPA's comments and issue the Part 70 permit as final. The re-issued permit will supersede this permit in its entirety.

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**AIR POLLUTION CONTROL OFFICER**

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Date

Notes: (1) Next Reevaluation Due: March 2010  
(2) PTO 12208 supersedes ATC 12208, ATC12208-01 and ATC 12208-02

Attachment: Permit Evaluation for PTO No. 12208

**Table 1 - Operating Equipment Description**  
**PTO 12208**  
**Celite Corporation - Lompoc Plant - Product Storage Silos**

Equipment Description				Baghouse Specification		Operating Limitations		
Equipment Item	APCD	PM Control	APCD	Size	Units	On-line		
	Dev No.		Dev No			(hr/day)	(hr/qtr)	(hr/yr)
Product Storage Silo BN101	109214	Donaldson 81MBT8 pos press Baghouse BH101	110191	2,411	scf/minute	24	2190	8760
Product Storage Silo BN102	109216	Donaldson 81MBT8 pos press Baghouse BH102	110192	2,411	scf/minute	24	2190	8760
Product Storage Silo BN103	109217	Donaldson 81MBT8 pos press Baghouse BH103	110193	2,411	scf/minute	24	2190	8760
Product Storage Silo BN104	109218	Donaldson 81MBT8 pos press Baghouse BH104	110194	2,411	scf/minute	24	2190	8760
Product Storage Silo BN105	109219	Donaldson 81MBT8 pos press Baghouse BH105	110195	2,411	scf/minute	24	2190	8760
Product Storage Silo BN106	109220	Donaldson 81MBT8 pos press Baghouse BH106	110196	2,411	scf/minute	24	2190	8760
Product Storage Silo BN107	109221	Donaldson 81MBT8 pos press Baghouse BH107	110197	2,411	scf/minute	24	2190	8760
Product Storage Silo BN108	109222	Donaldson 81MBT8 pos press Baghouse BH108	110198	2,411	scf/minute	24	2190	8760
Holding Bin BN925A	110643	Donaldson 36MBT6 pos press Baghouse BH925A	110641	720	scf/minute	24	2190	8760
Holding Bin BN925B	110644	Donaldson 36MBT6 pos press Baghouse BH925B	110642	720	scf/minute	24	2190	8760
Disposition Bin BN109A	110645	Donaldson 54MBT6 neg press Baghouse BH109A	110649	1500	scf/minute	24	2190	8760
Disposition Bin BN109B	110646	Donaldson 54MBT6 neg press Baghouse BH109B	110650	1500	scf/minute	24	2190	8760
Disposition Bin BN110A	110647	Donaldson 54MBT6 neg press Baghouse BH110A	110647	1500	scf/minute	24	2190	8760
Disposition Bin BN110B	110648	Donaldson 54MBT6 neg press Baghouse BH110B	110648	1500	scf/minute	24	2190	8760

**Table 2 - Equipment Emission Factors Federally Enforceable  
PTO 12208  
Celite Corporation - Lompoc Plant - Product Storage Silos**

Equipment Description					Emission Factors					Units	References
Equipment Item	APCD Dev No.	PM Control	APCD Dev No	NOx	ROC	CO	SOx	PM	PM10		
Product Storage Silo BN101	109214	Donaldson 81MBT8 pos press Baghouse BH101	110191					0.005	0.005	gr/dscf	ATC 12208-01
Product Storage Silo BN102	109216	Donaldson 81MBT8 pos press Baghouse BH102	110192					0.005	0.005	gr/dscf	ATC 12208-01
Product Storage Silo BN103	109217	Donaldson 81MBT8 pos press Baghouse BH103	110193					0.005	0.005	gr/dscf	ATC 12208-01
Product Storage Silo BN104	109218	Donaldson 81MBT8 pos press Baghouse BH104	110194					0.005	0.005	gr/dscf	ATC 12208-01
Product Storage Silo BN105	109219	Donaldson 81MBT8 pos press Baghouse BH105	110195					0.005	0.005	gr/dscf	ATC 12208-01
Product Storage Silo BN106	109220	Donaldson 81MBT8 pos press Baghouse BH106	110196					0.005	0.005	gr/dscf	ATC 12208-01
Product Storage Silo BN107	109221	Donaldson 81MBT8 pos press Baghouse BH107	110197					0.005	0.005	gr/dscf	ATC 12208-01
Product Storage Silo BN108	109222	Donaldson 81MBT8 pos press Baghouse BH108	110198					0.005	0.005	gr/dscf	ATC 12208-01
Holding Bin BN925A	110643	Donaldson 36MBT6 pos press Baghouse BH925A	110641					0.005	0.005	gr/dscf	ATC 12208-02
Holding Bin BN925B	110644	Donaldson 36MBT6 pos press Baghouse BH925B	110642					0.005	0.005	gr/dscf	ATC 12208-02
Disposition Bin BN109A	110645	Donaldson 54MBT6 neg press Baghouse BH109A	110649					0.005	0.005	gr/dscf	ATC 12208-02
Disposition Bin BN109B	110646	Donaldson 54MBT6 neg press Baghouse BH109B	110650					0.005	0.005	gr/dscf	ATC 12208-02
Disposition Bin BN110A	110647	Donaldson 54MBT6 neg press Baghouse BH110A	110647					0.005	0.005	gr/dscf	ATC 12208-02
Disposition Bin BN110B	110648	Donaldson 54MBT6 neg press Baghouse BH110B	110648					0.005	0.005	gr/dscf	ATC 12208-02

Table 3 - Short Term Emissions

PTO 12208

Celite Corporation - Lompoc Plant - Product Storage Silos

Equipment Description				NOx		ROC		CO		SOx		PM		PM10	
Equipment Item	APCD Dev No.	PM Control	APCD Dev No	lb/hr	lb/day										
Product Storage Silo BN101	109214	Donaldson 81MBT8 pos press Baghouse BH101	110191	--	--	--	--	--	--	--	--	0.10	2.48	0.10	2.48
Product Storage Silo BN102	109216	Donaldson 81MBT8 pos press Baghouse BH102	110192	--	--	--	--	--	--	--	--	0.10	2.48	0.10	2.48
Product Storage Silo BN103	109217	Donaldson 81MBT8 pos press Baghouse BH103	110193	--	--	--	--	--	--	--	--	0.10	2.48	0.10	2.48
Product Storage Silo BN104	109218	Donaldson 81MBT8 pos press Baghouse BH104	110194	--	--	--	--	--	--	--	--	0.10	2.48	0.10	2.48
Product Storage Silo BN105	109219	Donaldson 81MBT8 pos press Baghouse BH105	110195	--	--	--	--	--	--	--	--	0.10	2.48	0.10	2.48
Product Storage Silo BN106	109220	Donaldson 81MBT8 pos press Baghouse BH106	110196	--	--	--	--	--	--	--	--	0.10	2.48	0.10	2.48
Product Storage Silo BN107	109221	Donaldson 81MBT8 pos press Baghouse BH107	110197	--	--	--	--	--	--	--	--	0.10	2.48	0.10	2.48
Product Storage Silo BN108	109222	Donaldson 81MBT8 pos press Baghouse BH108	110198	--	--	--	--	--	--	--	--	0.10	2.48	0.10	2.48
Holding Bin BN925A	110643	Donaldson 36MBT6 pos press Baghouse BH925A	110641	--	--	--	--	--	--	--	--	0.03	0.74	0.03	0.74
Holding Bin BN925B	110644	Donaldson 36MBT6 pos press Baghouse BH925B	110642	--	--	--	--	--	--	--	--	0.03	0.74	0.03	0.74
Disposition Bin BN109A	110645	Donaldson 54MBT6 neg press Baghouse BH109A	110649	--	--	--	--	--	--	--	--	0.06	1.54	0.06	1.54
Disposition Bin BN109B	110646	Donaldson 54MBT6 neg press Baghouse BH109B	110650	--	--	--	--	--	--	--	--	0.06	1.54	0.06	1.54
Disposition Bin BN110A	110647	Donaldson 54MBT6 neg press Baghouse BH110A	110647	--	--	--	--	--	--	--	--	0.06	1.54	0.06	1.54
Disposition Bin BN110B	110648	Donaldson 54MBT6 neg press Baghouse BH110B	110648	--	--	--	--	--	--	--	--	0.06	1.54	0.06	1.54

Table 4 - Long Term Emissions  
PTO 12208

Celite Corporation - Lompoc Plant - Product Storage Silos

Equipment Description				NOx		ROC		CO		SOx		PM		PM10	
Equipment Item	APCD Dev No.	PM Control	APCD Dev No	TPQ	TPY	TPQ	TPY	TPQ	TPY	TPQ	TPY	TPQ	TPY	TPQ	TPY
Product Storage Silo BN101	109214	Donaldson 81MBT8 pos press Baghouse BH101	110191	--	--	--	--	--	--	--	--	0.11	0.45	0.11	0.45
Product Storage Silo BN102	109216	Donaldson 81MBT8 pos press Baghouse BH102	110192	--	--	--	--	--	--	--	--	0.11	0.45	0.11	0.45
Product Storage Silo BN103	109217	Donaldson 81MBT8 pos press Baghouse BH103	110193	--	--	--	--	--	--	--	--	0.11	0.45	0.11	0.45
Product Storage Silo BN104	109218	Donaldson 81MBT8 pos press Baghouse BH104	110194	--	--	--	--	--	--	--	--	0.11	0.45	0.11	0.45
Product Storage Silo BN105	109219	Donaldson 81MBT8 pos press Baghouse BH105	110195	--	--	--	--	--	--	--	--	0.11	0.45	0.11	0.45
Product Storage Silo BN106	109220	Donaldson 81MBT8 pos press Baghouse BH106	110196	--	--	--	--	--	--	--	--	0.11	0.45	0.11	0.45
Product Storage Silo BN107	109221	Donaldson 81MBT8 pos press Baghouse BH107	110197	--	--	--	--	--	--	--	--	0.11	0.45	0.11	0.45
Product Storage Silo BN108	109222	Donaldson 81MBT8 pos press Baghouse BH108	110198	--	--	--	--	--	--	--	--	0.11	0.45	0.11	0.45
Holding Bin BN925A	110643	Donaldson 36MBT6 pos press Baghouse BH925A	110641	--	--	--	--	--	--	--	--	0.03	0.14	0.03	0.14
Holding Bin BN925B	110644	Donaldson 36MBT6 pos press Baghouse BH925B	110642	--	--	--	--	--	--	--	--	0.03	0.14	0.03	0.14
Disposition Bin BN109A	110645	Donaldson 54MBT6 neg press Baghouse BH109A	110649	--	--	--	--	--	--	--	--	0.07	0.28	0.07	0.28
Disposition Bin BN109B	110646	Donaldson 54MBT6 neg press Baghouse BH109B	110650	--	--	--	--	--	--	--	--	0.07	0.28	0.07	0.28
Disposition Bin BN110A	110647	Donaldson 54MBT6 neg press Baghouse BH110A	110647	--	--	--	--	--	--	--	--	0.07	0.28	0.07	0.28
Disposition Bin BN110B	110648	Donaldson 54MBT6 neg press Baghouse BH110B	110648	--	--	--	--	--	--	--	--	0.07	0.28	0.07	0.28

**Table 5 - Summary of Baghouse Parameters  
PTO 12208  
Celite Corporation - Lompoc Plant - Product Storage Silos**

Baghouse Description	APCD Device No.	Celite ID	Bag Dia, inches	Bag Lgth, feet	# of bags	Fabric Area, ft <sup>2</sup>	Air to Cloth ratio, cfm/ft <sup>2</sup>	delta P, in H <sub>2</sub> O	Positive or Negative Pressure	Process Temp, F (max)	Flow rate, scfm (max)	Blower HP	Filter Fabric Material	Cleaning Method	On/Off Line Cleaning
Baghouse 101	110191	BH101	6	8	81	1039	2.32:1	< 6	Positive	60	2411	N/A	Tetratex polyester felt-type	Pulse jet	On
Baghouse 102	110192	BH102	6	8	81	1039	2.32:1	< 6	Positive	60	2411	N/A	Tetratex polyester felt-type	Pulse jet	On
Baghouse 103	110193	BH103	6	8	81	1039	2.32:1	< 6	Positive	60	2411	N/A	Tetratex polyester felt-type	Pulse jet	On
Baghouse 104	110194	BH104	6	8	81	1039	2.32:1	< 6	Positive	60	2411	N/A	Tetratex polyester felt-type	Pulse jet	On
Baghouse 105	110195	BH105	6	8	81	1039	2.32:1	< 6	Positive	60	2411	N/A	Tetratex polyester felt-type	Pulse jet	On
Baghouse 106	110196	BH106	6	8	81	1039	2.32:1	< 6	Positive	60	2411	N/A	Tetratex polyester felt-type	Pulse jet	On
Baghouse 107	110197	BH107	6	8	81	1039	2.32:1	< 6	Positive	180	2411	N/A	Tetratex polyester felt-type	Pulse jet	On
Baghouse 108	110198	BH108	6	8	81	1039	2.32:1	< 6	Positive	60	2411	N/A	Tetratex polyester felt-type	Pulse jet	On
Baghouse 109A	110649	BH109A	6	6	54	518	2.90:1	< 6	Negative	180	1500	3	Tetratex polyester felt-type	Pulse jet	On
Baghouse 109B	110650	BH109B	6	6	54	518	2.90:1	< 6	Negative	180	1500	3	Tetratex polyester felt-type	Pulse jet	On
Baghouse 110A	110651	BH110A	6	6	54	518	2.90:1	< 6	Negative	60	1500	3	Tetratex polyester felt-type	Pulse jet	On
Baghouse 110B	110652	BH110B	6	6	54	518	2.90:1	< 6	Negative	60	1500	3	Tetratex polyester felt-type	Pulse jet	On
Baghouse 925A	110641	BH925A	6	6	36	345	2.09:1	< 6	Positive	60	720	N/A	Tetratex polyester felt-type	Pulse jet	On
Baghouse 925B	110642	BH925B	6	6	36	345	2.09:1	< 6	Positive	60	720	N/A	Tetratex polyester felt-type	Pulse jet	On

**Table 6**

**Santa Barbara County APCD – Equipment List**

PTO 12208 / FID: 00012 Celite Corporation / SSID: 01735

**A PERMITTED EQUIPMENT**

**1 Product Storage Silo 101**

<i>Device ID #</i>	<b>109214</b>	<i>Device Name</i>	<b>Product Storage Silo 101</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	181.40 Tons Produced
<i>Manufacturer</i>	Tank Connection Co	<i>Operator ID</i>	BN101
<i>Model</i>	Custom	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Dimensions: 25ft dia x 100 ft high (with footings); storage capacity 200 metric tons		

**2 Product Storage Silo 102**

<i>Device ID #</i>	<b>109216</b>	<i>Device Name</i>	<b>Product Storage Silo 102</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	181.40 Tons Produced
<i>Manufacturer</i>	Tank Connection Co	<i>Operator ID</i>	BN102
<i>Model</i>	Custom	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Dimensions: 25ft dia x 100 ft high (with footings); storage capacity 200 metric tons		

**3 Product Storage Silo 103**

<i>Device ID #</i>	<b>109217</b>	<i>Device Name</i>	<b>Product Storage Silo 103</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	181.40 Tons Produced
<i>Manufacturer</i>	Tank Connection Co	<i>Operator ID</i>	BN103
<i>Model</i>	Custom	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Dimensions: 25ft dia x 100 ft high (with footings); storage capacity 200 metric tons		

#### 4 Product Storage Silo 104

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<i>Device ID #</i>	<b>109218</b>	<i>Device Name</i>	<b>Product Storage Silo 104</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	181.40 Tons Produced
<i>Manufacturer</i>	Tank Connection Co	<i>Operator ID</i>	BN104
<i>Model</i>	Custom	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Dimensions: 25ft dia x 100 ft high (with footings); storage capacity 200 metric tons		

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#### 5 Product Storage Silo 105

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<i>Device ID #</i>	<b>109219</b>	<i>Device Name</i>	<b>Product Storage Silo 105</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	181.40 Tons Produced
<i>Manufacturer</i>	Tank Connection Co	<i>Operator ID</i>	BN105
<i>Model</i>	Custom	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Dimensions: 25ft dia x 100 ft high (with footings); storage capacity 200 metric tons		

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#### 6 Product Storage Silo 106

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<i>Device ID #</i>	<b>109220</b>	<i>Device Name</i>	<b>Product Storage Silo 106</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	181.40 Tons Produced
<i>Manufacturer</i>	Tank Connection Co	<i>Operator ID</i>	BN106
<i>Model</i>	Custom	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Dimensions: 25ft dia x 100 ft high (with footings); storage capacity 200 metric tons		

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## 7 Product Storage Silo 107

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<i>Device ID #</i>	<b>109221</b>	<i>Device Name</i>	<b>Product Storage Silo 107</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	181.40 Tons Produced
<i>Manufacturer</i>	Tank Connection Co	<i>Operator ID</i>	BN107
<i>Model</i>	Custom	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Dimensions: 25ft dia x 100 ft high (with footings); storage capacity 200 metric tons		

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## 8 Product Storage Silo 108

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<i>Device ID #</i>	<b>109222</b>	<i>Device Name</i>	<b>Product Storage Silo 108</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	181.40 Tons Produced
<i>Manufacturer</i>	Tank Connection Co	<i>Operator ID</i>	BN108
<i>Model</i>	Custom	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Dimensions: 25ft dia x 100 ft high (with footings); storage capacity 200 metric tons		

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## 9 Inlet Hose Station Product Storage Silos

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<i>Device ID #</i>	<b>109231</b>	<i>Device Name</i>	<b>Inlet Hose Station Product Storage Silos</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Cyclonaire	<i>Operator ID</i>	HS118
<i>Model</i>	Custom	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Product pneumatically transferred from system line bulk bin to storage silo by existing 600 cfm Sutorbilt product blower.		

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## 10 Outlet Hose Station Product Storage Silos

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<i>Device ID #</i>	<b>109232</b>	<i>Device Name</i>	<b>Outlet Hose Station Product Storage Silos</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Cyclonaire	<i>Operator ID</i>	HS119
<i>Model</i>	Custom	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Product pneumatically transferred from storage silo to existing packer bin, bulk bin or railcar by powder pumps PP111-PP115.		

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## 11 Baghouse 101

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<i>Device ID #</i>	<b>110191</b>	<i>Device Name</i>	<b>Baghouse 101</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	2411.00 scf/Minute
<i>Manufacturer</i>	Donaldson	<i>Operator ID</i>	BH101
<i>Model</i>	81MBT8	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Controls particulate emissions from product storage silo BN101; positive pressure baghouse ; contains 81Tetratex polyester felt-type bags; each bag 6 in D x 8 ft L; total fabric area 1039 sq ft; pulse jet cleaning		

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## 12 Baghouse 102

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<i>Device ID #</i>	<b>110192</b>	<i>Device Name</i>	<b>Baghouse 102</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	2411.00 scf/Minute
<i>Manufacturer</i>	Donaldson	<i>Operator ID</i>	
<i>Model</i>	81MBT8	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Controls particulate emissions from product storage silo BN102; positive pressure baghouse ; contains 81Tetratex polyester felt-type bags; each bag 6 in D x 8 ft L; total fabric area 1039 sq ft; pulse jet cleaning		

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### 13 Baghouse 103

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<i>Device ID #</i>	<b>110193</b>	<i>Device Name</i>	<b>Baghouse 103</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	2411.00 scf/Minute
<i>Manufacturer</i>	Donaldson	<i>Operator ID</i>	
<i>Model</i>	81MBT8	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Controls particulate emissions from product storage silo BN103; positive pressure baghouse ; contains 81Tetratex polyester felt-type bags; each bag 6 in D x 8 ft L; total fabric area 1039 sq ft; pulse jet cleaning		

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### 14 Baghouse 104

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<i>Device ID #</i>	<b>110194</b>	<i>Device Name</i>	<b>Baghouse 104</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	2411.00 scf/Minute
<i>Manufacturer</i>	Donaldson	<i>Operator ID</i>	
<i>Model</i>	81MBT8	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Controls particulate emissions from product storage silo BN104; positive pressure baghouse ; contains 81Tetratex polyester felt-type bags; each bag 6 in D x 8 ft L; total fabric area 1039 sq ft; pulse jet cleaning		

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### 15 Baghouse 105

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<i>Device ID #</i>	<b>110195</b>	<i>Device Name</i>	<b>Baghouse 105</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	2411.00 scf/Minute
<i>Manufacturer</i>	Donaldson	<i>Operator ID</i>	
<i>Model</i>	81MBT8	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Controls particulate emissions from product storage silo BN105; positive pressure baghouse ; contains 81Tetratex polyester felt-type bags; each bag 6 in D x 8 ft L; total fabric area 1039 sq ft; pulse jet cleaning		

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**16 Baghouse 106**

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<i>Device ID #</i>	<b>110196</b>	<i>Device Name</i>	<b>Baghouse 106</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	2411.00 scf/Minute
<i>Manufacturer</i>	Donaldson	<i>Operator ID</i>	
<i>Model</i>	81MBT8	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Controls particulate emissions from product storage silo BN106; positive pressure baghouse ; contains 81Tetratex polyester felt-type bags; each bag 6 in D x 8 ft L; total fabric area 1039 sq ft; pulse jet cleaning		

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**17 Baghouse 107**

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<i>Device ID #</i>	<b>110197</b>	<i>Device Name</i>	<b>Baghouse 107</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	2411.00 scf/Minute
<i>Manufacturer</i>	Donaldson	<i>Operator ID</i>	
<i>Model</i>	81MBT8	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Controls particulate emissions from product storage silo BN107; positive pressure baghouse ; contains 81Tetratex polyester felt-type bags; each bag 6 in D x 8 ft L; total fabric area 1039 sq ft; pulse jet cleaning		

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**18 Baghouse 108**

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<i>Device ID #</i>	<b>110198</b>	<i>Device Name</i>	<b>Baghouse 108</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	2411.00 scf/Minute
<i>Manufacturer</i>	Donaldson	<i>Operator ID</i>	
<i>Model</i>	81MBT8	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Controls particulate emissions from product storage silo BN108; positive pressure baghouse ; contains 81Tetratex polyester felt-type bags; each bag 6 in D x 8 ft L; total fabric area 1039 sq ft; pulse jet cleaning		

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**19 Powder Pumps - PP111 - PP115**

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<i>Device ID #</i>	<b>110640</b>	<i>Device Name</i>	<b>Powder Pumps - PP111 - PP115</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	200.00 Cubic Feet
<i>Manufacturer</i>	Cyclonaire	<i>Operator ID</i>	PP111 - PP115
<i>Model</i>	DPV-200B	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Air pressure driven; 200 cu ft capacity		

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**20 Baghouse - BH925A**

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<i>Device ID #</i>	<b>110641</b>	<i>Device Name</i>	<b>Baghouse - BH925A</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	720.00 scf/Minute
<i>Manufacturer</i>	Donaldson	<i>Operator ID</i>	BH925A
<i>Model</i>	36MBT6	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Particulate emission control on Holding Bin (BN925A); positive pressure baghouse; contains 36 Tetratex polyester bags; each bag 6 in D x 6 ft L; total fabric area 345 sq ft; pulse jet cleaning; operating temperature 60F		

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**21 Baghouse - BH925B**

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<i>Device ID #</i>	<b>110642</b>	<i>Device Name</i>	<b>Baghouse - BH925B</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	720.00 scf/Minute
<i>Manufacturer</i>	Donaldson	<i>Operator ID</i>	BH925B
<i>Model</i>	36MBT6	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Particulate emission control on Holding Bin (BN925B); positive pressure baghouse; contains 36 Tetratex polyester bags; each bag 6 in D x 6 ft L; total fabric area 345 sq ft; pulse jet cleaning; operating temperature 60F		

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**22 Holding Bin - BN925A**

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<i>Device ID #</i>	<b>110643</b>	<i>Device Name</i>	<b>Holding Bin - BN925A</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	20.00 Tons
<i>Manufacturer</i>	Tank Connection	<i>Operator ID</i>	BN925A
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>			

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**23 Holding Bin - BN925B**

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<i>Device ID #</i>	<b>110644</b>	<i>Device Name</i>	<b>Holding Bin - BN925B</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	20.00 Tons
<i>Manufacturer</i>	Tank Connection	<i>Operator ID</i>	BN925B
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device</i>			
<i>Description</i>			

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**24 Disposition Bin - BN109A**

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<i>Device ID #</i>	<b>110645</b>	<i>Device Name</i>	<b>Disposition Bin - BN109A</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	20.00 Tons
<i>Manufacturer</i>	Tank Connection	<i>Operator ID</i>	BN109A
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device</i>			
<i>Description</i>			

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**25 Disposition Bin - BN109B**

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<i>Device ID #</i>	<b>110646</b>	<i>Device Name</i>	<b>Disposition Bin - BN109B</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	20.00 Tons
<i>Manufacturer</i>	Tank Connection	<i>Operator ID</i>	BN109B
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device</i>			
<i>Description</i>			

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**26 Disposition Bin - BN110A**

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<i>Device ID #</i>	<b>110647</b>	<i>Device Name</i>	<b>Disposition Bin - BN110A</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	20.00 Tons
<i>Manufacturer</i>	Tank Connection	<i>Operator ID</i>	BN110A
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device</i>			
<i>Description</i>			

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**27 Disposition Bin - BN110B**

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<i>Device ID #</i>	<b>110648</b>	<i>Device Name</i>	<b>Disposition Bin - BN110B</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	20.00 Tons
<i>Manufacturer</i>	Tank Connection	<i>Operator ID</i>	BN110B
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device</i>			
<i>Description</i>			

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**28 Baghouse - BH109A**

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<i>Device ID #</i>	<b>110649</b>	<i>Device Name</i>	<b>Baghouse - BH109A</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	1500.00 scf/Minute
<i>Manufacturer</i>	Donaldson	<i>Operator ID</i>	BH109A
<i>Model</i>	54MBT6	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device</i>			
<i>Description</i>			Particulate emission control on Disposition Bin (BN109A); negative pressure baghouse with a 3HP motor driven blower; contains 54 Tetratex polyester bags; each bag 6 in D x 6 ft L; total fabric area 518 sq ft; pulse jet cleaning; operating temperature 60 - 180F

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**29 Baghouse - BH109B**

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<i>Device ID #</i>	<b>110650</b>	<i>Device Name</i>	<b>Baghouse - BH109B</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	1500.00 scf/Minute
<i>Manufacturer</i>	Donaldson	<i>Operator ID</i>	BH109B
<i>Model</i>	54MBT6	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device</i>			
<i>Description</i>			Particulate emission control on Disposition Bin (BN109B); negative baghouse with a 3HP motor driven blower; contains 54 Tetratex polyester bags; each bag 6 in D x 6 ft L; total fabric area 518 sq ft; pulse jet cleaning; operating temperature 60 - 180F

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**30 Baghouse - BH110A**

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<i>Device ID #</i>	<b>110651</b>	<i>Device Name</i>	<b>Baghouse - BH110A</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	1500.00 scf/Minute
<i>Manufacturer</i>	Donaldson	<i>Operator ID</i>	BH110A
<i>Model</i>	54MBT6	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Particulate emission control on Disposition Bin (BN110A); negative pressure baghouse with a 3HP motor driven blower; contains 54 Tetratex polyester bags; each bag 6 in D x 6 ft L; total fabric area 518 sq ft; pulse jet cleaning; operating temperature 60F		

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**31 Baghouse - BH110B**

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<i>Device ID #</i>	<b>110652</b>	<i>Device Name</i>	<b>Baghouse - BH110B</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	1500.00 scf/Minute
<i>Manufacturer</i>	Donaldson	<i>Operator ID</i>	BH110B
<i>Model</i>	54MBT6	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Particulate emission control on Disposition Bin (BN110B); negative pressure baghouse with a 3HP motor driven blower; contains 54 Tetratex polyester bags; each bag 6 in D x 6 ft L; total fabric area 518 sq ft; pulse jet cleaning; operating temperature 60F		

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**32 Powder Pumps - PP116 - PP117 A&B**

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<i>Device ID #</i>	<b>110653</b>	<i>Device Name</i>	<b>Powder Pumps - PP116 - PP117 A&amp;B</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	100.00 Cubic Feet
<i>Manufacturer</i>	Cyclonaire	<i>Operator ID</i>	PP116 -117 A&B
<i>Model</i>	DPV-100B	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Air pressure driven; 100 cu ft capacity		

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**33 Powder Pumps - PP925 A&B**

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<i>Device ID #</i>	<b>110654</b>	<i>Device Name</i>	<b>Powder Pumps - PP925 A&amp;B</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	25.00 Cubic Feet
<i>Manufacturer</i>	Cyclonaire	<i>Operator ID</i>	PP925 A&B
<i>Model</i>	DPV-25B	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Air pressure driven; 25 cu ft capacity		

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**Table 7. Source Test Requirements<sup>a</sup>**

Eqpmt ID	Equipment or Product	Test Requirements (units)	USEPA Method	Pollutants
Dev No 110191 through 110198, 110641, 110642, 110649 through 110652	Product Silo and Bin Vent Baghouses	Mass emission rate (lb/hr)	5	PM/PM <sub>10</sub>
		Outlet concentration (gr/dscf)	5/17	PM/PM <sub>10</sub>
		Outlet flow rate (dscfm)	1,2,3,4	

<sup>a</sup> PM is total suspended particulates; and use of PM:PM<sub>10</sub> ratio = 1 allows testing for PM only.



**PERMIT EVALUATION for  
PERMIT TO OPERATE No. 12208**

Page 1 of 6

**1.0 BACKGROUND**

- 1.1 General: Celite currently mines and processes diatomaceous earth (DE) at its Lompoc Plant. Celite operates four product lines (3, 5, 6, and 7 Systems) each with “wet end” and “dry end” processing. Wet diatomaceous earth crude is surface mined, crushed, milled and dried and/or calcined at high temperatures. The dried product is temporarily held in bulk bins. ATC 12208 was issued January 31, 2007 to authorize the installation of a eight product storage silos each controlled by a bin vent baghouse and two product transfer hose stations. The eight storage silos enable product to be transferred from the bulk bins to the silos and stored for later bagging or bulk loading for shipment to distributors and customers.

ATC 12208-01 was issued to Celite on August 31, 2007 for the replacement of the negative pressure silo baghouses with positive pressure silo baghouses. There were no new emissions from this project.

ATC 12208-02 was issued to Celite on December 27, 2007 for the installation of six (6) new storage bins, six (6) new bin vent baghouses, and eleven (11) new powder pumps. The bins and powder pumps are be used to convey material to and from the eight storage silos.

On June 30, 2008, Celite applied for modifications to ATC 12208. The application requested an increase in airflow and revision to the differential pressure values on baghouses BH109A, BH109B, BH110A and BH110B, as well as a revision to the differential pressure values on baghouses BH101, BH102, BH103, BH104, BH105, BH106, BH107, and BH108. The proposed increase in permitted airflow came after a source testing demonstrated compliance with the BACT emission standards at the increased airflow. Similarly, the proposal to reduce differential pressure lower limits came after source tests demonstrated compliance with the BACT emission standards at measured pressure drops low enough to be considered instrument noise.

On July 9, 2008, Celite applied for Permit to Operate 12208. The changes requested in the ATC modification request dated June 30, 2008 have been directly incorporated into this Permit to Operate.

- 1.2 Project Description: The product storage silo installation is comprised of eight silos (Dev. No.s 109214 and 109216 through 109222) and an inlet and outlet hose station (Dev. No.s 109231 and

PERMIT EVALUATION  
Permit to Operate No. 12208

Page 2 of 6

109232 respectively). The capacity of each product silo is 200 metric tons. Particulate emissions are controlled by Donaldson positive pressure bin vent baghouses (Dev. No.s 110191 through 110198) installed directly on each silo. Since each baghouse is installed directly on top of the silo, any particulates removed from the inside of the bag surfaces during the pulse jet cleaning cycle using 90 psig industrial air fall back into the silo.

Celite has also installed six (6) storage bins, six (6) bin vent baghouses, and eleven (11) powder pumps. The bins and powder pumps are used to convey material to and from the eight storage silos. The storage bins are tied into existing equipment at Celite's Lompoc Plant. The tie-ins to existing equipment are implemented using existing connections on each of the bins, using both hard piped connections and flex-lines. The lines are plumbed to a header or individually run to the new packer stations. The connections use existing product pumps and existing Sutorbilt blowers (APCD Device No. 103373). The tie-ins will remain available after System 7 is complete.

The tie in from existing equipment is directly to the Bins BN110A (APCD Device No. 110647), BN110B (APCD Device No. 110648) BN109A (APCD Device No. 110645), BN109B (APCD Device No. 110646), BN925A (APCD Device No. 110643) and BN925B (APCD Device No. 110644).

A complete list of the inlet sources is as follows:

- #1 Bulk Bin (APCD Device No. 106107)
- #2 Bulk Bin (APCD Device No. 106107)
- #7 Bulk Bin (APCD Device No. 103414)
- #8 Bulk Bin (APCD Device No. 103414)
- #9 Bulk Bin (APCD Device No. 103493)
- #10 Bulk Bin (APCD Device No. 103493)
- East Sifter Bin (APCD Device No. 103414)
- Coarse Bin (APCD Device No. 103414)
- 3SC Bin (APCD Device No. 106106)
- 5P Bin (APCD Device No. 103332)
- 6A Bin (APCD Device No. 22031)
- 3P Bin (APCD Device No. 106107)

- 1.3 Compliance/SCDP: The silos and the associated control devices were inspected during SCDP and found in compliance with the terms and conditions of ATC 12208. Source testing of the following baghouses was conducted on the dates noted in accordance with the SCDP and source testing conditions of ATC 12208: BH103 (5/6/2008), BH106 (4/16/2008), BH105 (4/15/2008), BH101 (4/22/2008), BH104 (4/22/2008), BH102 (5/7/2008), BH110B (5/9/2008), BH110A (5/6/2008), BH109B (5/7/2008) and BH109A (5/8/2008). All tested baghouses were found in compliance with the PM and PM10 emission limits in ATC 12208. However, the air flow through BH110B, BH110A, BH109B and BH109A was recorded at levels which exceeded the originally permitted limit which was based on engineering assumptions. The air flow for these baghouses is modified as part of this permitting action and the resulting PTE and NEI increase in PM and PM10 are reflected in the IDS and NEI tables shown in this permit. BH107 and BH108 were not tested due to filler

PERMIT EVALUATION  
Permit to Operate No. 12208

Page 3 of 6

product storage and lack of flow measured during transfer of filler product into silo, but will need to be tested if product other than filler is stored.

The initial Method 9 inspections required by 40CFR Part 60 Subpart OOO for each baghouse stack were not completed by Celite within the time frame required by Subpart OOO. Celite was issued a Notice of Violation for non-compliance with this requirement, and subsequently completed eight of the Method 9 inspections by December 4, 2008. The six remaining inspections (Dev. No.s 110192, 110641, 110642, 110649, 110650 and 110651) are required to be completed upon startup.

## **2.0 ENGINEERING ANALYSIS**

2.1 Equipment/Processes: Project product transfer equipment is powered by air pressure furnished by a new electrically driven compressor; therefore, the only potential project emissions are particulates. Positive pressure baghouse control devices with APCD Dev. No.s 110191 through 110198, 110641 and 110642 do not contain a blower and will operate under positive pressure created from air displacement through product transport during each silo or bin filling operation. The negative pressure baghouse controls on bins BN109A and B and BN110A and B are negative pressure baghouse with APCD Dev. No.s 110649 through 110652 each with a 3 HP blower. The entire system is enclosed and vented to baghouse controls, each with a manufacturer's maximum stack particulate emission guarantee of 0.005 gr/dscf. The only point where lines may be disconnected is at the product transfer hose stations.

2.2 Emission Controls: The Donaldson Torit Model 81MBT8 and Model 36MBT6 baghouses are passive baghouses that operate under positive pressure created from air displacement and product transport during each silo or bin filling operation. The Donaldson Torit Model 54MBT6 baghouses will operate under negative pressure created by a blower with a 3HP electric motor. Filling operation for each vessel will not exceed a maximum air flow listed in Table 5. These baghouses are designed to limit the particulate matter concentration in the exhaust to atmosphere to a level not to exceed 0.005 grains per dry standard cubic foot (gr/dscf). Pressure drop across each positive pressure baghouse will be maintained at less than 6 inches of water. The lower limit has been removed because the baghouses were shown to operate in compliance during source testing at levels lower than previously permitted. Because compliance was shown at pressure differentials in the area of what could be considered instrument noise, it does not appear a deletion of the lower pressure differential limit will impact control performance. The pressure drop across each silo baghouse was previously permitted at an operating pressure drop range of between 2 to 6 inches of water during silo filling.

To address ongoing performance, a condition has been added to the PTO to collect further delta P data to assess whether additional measures, including more frequent visible emissions inspections are necessary. The condition is intended to evaluate pressure declines that indicate problems with the bags or potential dusting, and allows the APCD an option to reopen the Baghouse I&M Plan if necessary.

2.3 Emissions: Potential PM/PM<sub>10</sub> emissions from the Donaldson baghouses are based on the maximum rated airflow for the baghouse exhaust listed for each baghouse in Table 5, the guaranteed outlet

PERMIT EVALUATION  
Permit to Operate No. 12208

Page 4 of 6

grain loading concentration (0.005 gr/dscf) and an operating schedule of 8,760 hours per year. The general equation for particulate matter emissions is:

$$E_{(\text{lb/day})} = EF_{(\text{gr/scf})} \times Q_{(\text{scf/min})} \times 1440_{(\text{min/day})} / 7000_{(\text{gr/lb})}$$
$$E_{(\text{ton/yr})} = EF_{(\text{gr/scf})} \times Q_{(\text{scf/min})} \times 60_{(\text{min/hr})} \times 8760_{(\text{hr/yr})} / 7000_{(\text{gr/lb})} / 2000_{(\text{lb/ton})}$$

where: E = mass emission rate  
EF = emission factor (0.005 grains/dscf)  
Q = exhaust flow rate (see Table 5)

The grain loading concentration is a guaranteed limit provided by the manufacturer. A copy of this guarantee is located in the project file. For permitting purposes, Celite has assumed that the PM/PM<sub>10</sub> ratio is 1:1.

Based on the above baghouse operating and design parameters, the permitted emission limits are listed in permit condition 1 of this permit. Source testing shall be conducted to verify the grain loading concentrations, air flow rate and mass emissions.

- 2.4 Reasonable Worst Case Emission Scenario: 24 hours per day and 8,760 hours per year.
- 2.5 Special Calculations: There are no special calculations.
- 2.6 BACT Analyses: The equipment under this PTO is a part of the System 7 modification that is permitted under ATC 12105. BACT is required on all equipment that is part of the System 7 modification. The PM/PM<sub>10</sub> control technology and emission standard of 0.005 gr/dscf and the transport and handling of product within an enclosed system controlled by a baghouse proposed by Celite for this project meets the current APCD definition of BACT.
- 2.7 Enforceable Operational Limits: The permit has enforceable operating conditions to ensure compliance with APCD rules and regulations.
- 2.8 Monitoring Requirements: This permit requires the monitoring of the pressure drop across the baghouse. The permitted pressure drop range for each baghouse is listed in permit Table 5. Periodic source testing is also required.
- 2.9 Recordkeeping and Reporting Requirements: The permit requires that specific data be recorded and reported to the APCD.

**3.0 REEVALUATION REVIEW (not applicable)**

PERMIT EVALUATION  
Permit to Operate No. 12208

Page 5 of 6

**4.0 REGULATORY REVIEW**

4.1 Partial List of Applicable Rules: This project is anticipated to operate in compliance with the following rules:

- Rule 101. Compliance of Existing Facilities
- Rule 205. Standards for Granting Permits
- Rule 302. Visible Emissions
- Rule 303. Nuisance
- Rule 304. Particulate Matter - Northern Zone
- Rule 306. Dust and Fumes - Northern Zone
- Rule 309. Specific Contaminants
- Rule 505. Breakdown Procedures
- Rule 801. New Source Review
- Rule 802. Nonattainment Review
- Rule 803. Prevention of Significant Deterioration

4.2 40 CFR Part 60 {New Source Performance Standards}: Subpart OOO applies to nonmetallic mineral processing plant crushers, grinding mills, screening operations, bucket elevators, belt conveyors, bagging operations, storage bins and enclosed truck or rail car loading stations constructed, reconstructed or modified, as defined by the standard, after August 31, 1983. The product storage silo and storage bin units covered under this ATC are an integral part of a nonmetallic mineral processing plant operation and are subject to Subpart OOO. As related to this permit, the Subpart OOO emission requirements are: (1) an exhaust emission limit of 0.022 gr/dscf, (2) a stack opacity limit of 7%, and (3) fugitive emissions from facility equipment not to exceed 10% opacity or no visible fugitive emissions emitted from the building enclosing these operations. Emissions from the baghouse are limited to 0.005 grains/dscf in permit condition #1, and thus will comply with Subpart OOO item #1 above. An initial Method 9 inspection for visible emissions is required for each silo baghouse stack per permit condition 9 to determine compliance with item 2 above. An initial Method 9 inspection is also required for visible fugitive emissions for the product silo for compliance with Subpart OOO item #3 above. Also, ongoing periodic monitoring has been included for determining compliance with APCD Rule 302 opacity limits, consistent with Part 70 permit 5840.

4.3 NEI Calculations: The increase in permitted airflow through baghouses BH109A, BH109B, BH110A and BH110B will result in an increase to the stationary source NEI of 0.490 lb/day and 0.089 ton/year of PM and PM10 and qualifies as a "P1" term in this PTO. The emission increase ("P1") and resultant stationary source NEI total are listed in attachment B.

**5.0 AQIA**

The APCD did not require an AQIA for the ATC modification or this PTO.



**ATTACHMENT A**

**IDS TABLES**

**IDS Database Emission Tables**

**Table 1  
Permitted Potential to Emit (PPTE)**

**PTO 12208 Product Storage Silos**

	<b>NOx</b>	<b>ROC</b>	<b>CO</b>	<b>SOx</b>	<b>PM</b>	<b>PM<sub>10</sub></b>
<b>lb/day</b>					0.49	0.49
<b>tons/year</b>					0.09	0.09

**Table 2  
Facility Potential to Emit (FPTE)**

	<b>NOx</b>	<b>ROC</b>	<b>CO</b>	<b>SOx</b>	<b>PM</b>	<b>PM<sub>10</sub></b>
<b>lb/day</b>	53869.13	6513.43	4213.84	57964.7	26959.47	26908.52
<b>tons/year</b>	9227.26	1188.30	762.86	10518.2	4913.46	4904.65

**Table 3  
Federal Pt-70 Facility Potential to Emit (PT70 FPTE)**

	<b>NOx</b>	<b>ROC</b>	<b>CO</b>	<b>SOx</b>	<b>PM</b>	<b>PM<sub>10</sub></b>
<b>lb/day</b>	20919.76	10180.6	36854.26	48287.37	7358.70	7335.32
<b>tons/year</b>	3817.86	1857.96	6725.90	8797.23	1330.28	1335.84

**Table 4  
Facility Net Emission Increase (FNEI-90)**

	<b>NOx</b>	<b>ROC</b>	<b>CO</b>	<b>SOx</b>	<b>PM</b>	<b>PM<sub>10</sub></b>
<b>lb/day</b>	0.00	2.49	85.66	0.00	77.25	75.98
<b>tons/year</b>	0.00	0.46	14.44	0.00	11.08	11.74

**ATTACHMENT B**

**NEI TABLE**

**TABLE - Stationary Source NEI**  
**Celite Corporation - Lompoc and Celpure Plants**

**I. This Project's "I" NEI-90**

Permit No.	Date Issued	NOx		ROC		CO		SOx		PM		PM10	
		lb/day	ton/yr										
PTO 12208													
<b>Totals</b>		<b>0.00</b>											

**II. Stationary Source "P1s"**

Enter all stationary source "P1" NEI-90s below:

Permit No.	Date Issued	NOx		ROC		CO		SOx		PM		PM10	
		lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
PTO 5840-R2 <sup>1</sup>	Jun-03					145.40	25.25	3.60	0.23	10.46	4.25	12.12	2.13
A/P 11107	Dec-03									1.90	0.33	1.90	0.33
PTO 11008	Mar-04									6.48	1.15	1.85	0.33
PTO 11083	Apr-04									0.55	0.03	0.55	0.03
ATC/PTO 11224	Sep-04									16.07	2.57	16.07	2.57
PTO 11007	Mar-05									0.59	0.10	0.59	0.10
ATC/PTO 11224-01	Apr-06									0.48	0.08	0.48	0.08
ATC 12091	Oct-06									16.24	2.96	16.24	2.96
ATC 12208	Jan-07									19.84	3.62	19.84	3.62
ATC 12091-01 <sup>2</sup>	Mar-07									0.00	0.00	0.00	0.00
ATC 12105	Jun-07	48.53	8.86	10.74	1.96	147.41	26.90	84.63	15.45	151.81	27.32	145.45	26.42
ATC 12208-01 <sup>3</sup>	Aug-07									0.00	0.00	0.00	0.00
ATC 12091-02	Sep-07									11.31	2.06	11.31	2.06
ATC 12208-02	Dec-07									7.16	1.31	7.16	1.31
ATC 12315	Jan-08									33.08	1.59	16.06	0.79
ATC 12105-01	Jan-08									57.79	10.55	57.79	10.55
ATC 12091-03	Jun-08									2.06	0.38	2.06	0.38
PTO 12398 <sup>4</sup>	Jul-08									23.15	4.22	23.15	4.22
PTO 12315	TBD										1.43		0.68
PTO 12208	TBD									0.49	0.09	0.49	0.09
<b>Totals</b>		<b>48.53</b>	<b>8.86</b>	<b>10.74</b>	<b>1.96</b>	<b>292.81</b>	<b>52.15</b>	<b>88.23</b>	<b>15.68</b>	<b>359.46</b>	<b>64.04</b>	<b>333.11</b>	<b>58.65</b>

Notes:  
 1. Stationary source (Lompoc and Celpure Plant) NEI as found in Table 5.6 of Pt70 PTO 5840-R2 issued 6/24/03  
 2. PTE remains the same under modification ATC 12091-01 as PTE under ATC 12091; therefore, no increase in PTE.  
 3. PTE remains the same under modification ATC 12208-01 as PTE under ATC 12208; therefore, no increase in PTE.  
 4. P1 includes ATC 12398 project plus an increase of 3.35 lb/day PM/PM10 incorporated in PTO 12398.

**III. Stationary Source "P2" NEI-90 Decreases**

Enter all facility "P2" NEI-90s below:

Permit No.	Date Issued	NOx		ROC		CO		SOx		PM		PM10	
		lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
PTO 11083	Apr-04									0.24	0.03	0.24	0.03
ATC 12105-01	Jan-08	28.06	5.12	6.21	1.13	85.25	15.56	12.68	2.32	80.84	14.75	80.84	14.75
<b>Totals</b>		<b>28.06</b>	<b>5.12</b>	<b>6.21</b>	<b>1.13</b>	<b>85.25</b>	<b>15.56</b>	<b>12.68</b>	<b>2.32</b>	<b>81.08</b>	<b>14.78</b>	<b>81.08</b>	<b>14.78</b>

**IV. Stationary Source Pre-90 "D" Decreases**

Enter all stationary source "D" decreases below:

Permit No.	Date Issued	NOx		ROC		CO		SOx		PM		PM10	
		lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
ATC 12105-01 <sup>1,2</sup>	Jan-08	20.47	3.74	2.04	0.37	121.90	22.15	75.55	13.36	201.13	38.18	176.05	32.13
<b>Totals</b>		<b>20.47</b>	<b>3.74</b>	<b>2.04</b>	<b>0.37</b>	<b>121.90</b>	<b>22.15</b>	<b>75.55</b>	<b>13.36</b>	<b>201.13</b>	<b>38.18</b>	<b>176.05</b>	<b>32.13</b>

Notes: 1. "D"-Term values in table above excludes reductions which are subject to DOI 047 ERC application (see table below).

This is necessary so that NEI remains non-negative per Rule 801

2. Original ATC 12105 NOx, SOx, and PM "D" Term adjusted to account for equipment removal in ATC 12105-01

	NOx		SOx		PM	
	lb/day	TPY	lb/day	TPY	lb/day	TPY
Total Reductions from ATC 12105 ("D" Term)	65.82	12.01	1147.42	209.40	355.87	64.95
D Term Adjustment I + (P1-P2) on June 11, 2007 (issue date of ATC 12105)	48.53	8.86	88.23	15.68	224.18	42.38
Add I Term from ATC 12105-01					57.79	10.55
Subtract Above P2 Decrease	28.06	5.12	12.68	2.32	80.84	14.75
Remaining Reductions subject to DOI 047 application	45.35	8.27	1071.87	196.04	270.32	47.87

**V. Calculated Stationary Source NEI-90**

Table below summarizes stationary source NEI-90 as equal to: I + (P1-P2) -D

Term	NOx		ROC		CO		SOx		PM		PM10	
	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
I	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
P1	48.53	8.86	10.74	1.96	292.81	52.15	88.23	15.68	359.46	64.04	333.11	58.65
P2	28.06	5.12	6.21	1.13	85.25	15.56	12.68	2.32	81.08	14.78	81.08	14.78
D	20.47	3.74	2.04	0.37	121.90	22.15	75.55	13.36	201.13	38.18	176.05	32.13
<b>NEI-90</b>	<b>0.00</b>	<b>0.00</b>	<b>2.49</b>	<b>0.46</b>	<b>85.66</b>	<b>14.44</b>	<b>0.00</b>	<b>0.00</b>	<b>77.25</b>	<b>11.08</b>	<b>75.98</b>	<b>11.74</b>

Notes: Per Rule 801, "In no event shall the net emission increase for a stationary source be less than zero."

**ATTACHMENT C**  
**RESPONSE TO COMMENTS**

**The following are the APCD responses to comments on the draft permit by Celite in the letter dated February 6, 2009:**

1. Celite Comment: Page 6, Condition C.3.(c). Celite agrees to perform an initial Method 9 opacity inspection on the remaining baghouses (Dev. No.s 110192, 110641, 110642, 110649, 110650 and 110651) within 60 days of final issuance of the permit, providing the remaining baghouses operate. Method 9 inspections can not be completed on equipment that does not operate.

APCD Response: Condition 9.C.3.(c) revised to require initial Method 9 opacity inspections within 1 week of initiation of operation of each unit, and District notification within 24 hours of startup.

2. Celite Comment: Page 12, Condition C.19. There is an apparent typo as the text of Condition C.12 is inserted into this condition as "A.18."

APCD Response: Typo corrected

3. Celite Comment: Table 5, Baghouse Parameters, Air to cloth ratio for Baghouses BH109A, B and BH110A, B. Please correct the air to cloth ratio to reflect the revised airflow (2.90 cfm/ft<sup>2</sup>).

APCD Response: Table 5 updated to reflect air to cloth ratio at the revised airflow.

4. Celite Comment: Table 6, Equipment List, items 28, 29, 30, and 31. The physical size for BH109A, B, and BH110A,B should read 1,500 scfm.

APCD Response: Table 6, Equipment List, updated to reflect the revised airflow for BH109A,B, and BH110A,B.

5. Celite Comment: Engineering Evaluation, Page 1, Section 1.1, first sentence of last paragraph. There is a typo and this should begin "On July 9, 2009,....." (not One July 9, 2009.....).

APCD Response: Typo corrected and sentence started with "On July 9. 8008..."

6. Celite Comment: Engineering Evaluation, Page 5, Section 4.2. Celite does not agree that an initial Method 9 inspection is required for visible fugitive emissions for the hose station equipment for compliance with Subpart OOO. Subpart OOO does not appear to apply to the hose station.

APCD Response: After further review of NSPS OOO, the language requiring initial method 9 inspection for visible emissions for the hose station equipment removed from Engineering Evaluation Section 4.2.

7. Celite Comment: Tables 1-6. As part of Celite's PTO application, submitted July 9, 2008, request was made to clarify the equipment names to simplify permit compliance and inspections. Celite plant operators and staff do not use the names listed in the permit. If for example, an inspector asks to see a piece of equipment based on the current equipment list, it will not be logical to the operators what equipment is being referenced. Celite again requests that the equipment names in the permit reflect the equipment names actually being used for the equipment:

<b>APCD Device No</b>	<b>Celite ID</b>	<b>Equipment Name</b>
110641	BH925A	Baghouse BH925A
110642	BH925B	Baghouse BH925B
110643	BN925A	Holding Bin BN925A
110644	BN925B	Holding Bin BN925B
110645	BN109A	Disposition Bin BN109A
110646	BN109B	Disposition Bin BN109B
110647	BN110A	Disposition Bin BN110A
110648	BN110B	Disposition Bin BN110B
110649	BH109A	Baghouse BH109A
110650	BH109B	Baghouse BH109B
110651	BH110A	Baghouse BH110A
110652	BH110B	Baghouse BH110B

APCD Response: Tables 1-6 updated to reflect the equipment names actually being used and referenced in the table above.