



OCT 04 2012

Phil Castro  
E & J Gallo Winery  
5610 E. Olive Ave.  
Fresno, CA 93727

**Re: Proposed Authorities to Construct / Certificate of Conformity (Minor Mod)  
District Facility # C-447  
Project # C-1120336**

Dear Mr. Castro:

Enclosed for your review is the District's analysis of your application for Authorities to Construct for the facility identified above. You have requested that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. The applicant requests Authority to Construct (ATC) permits for the modification of their organic material storage and composting operations for District Rule 4566 (Organic Material Composting Operations) compliance purposes.

After addressing any EPA comments made during the 45-day comment period, the Authorities to Construct will be issued to the facility with a Certificate of Conformity. Prior to operating with modifications authorized by the Authorities to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

If you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Thank you for your cooperation in this matter.

Sincerely,



David Warner  
Director of Permit Services

Enclosures  
cc: Brian Clements, Permit Services

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

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**Northern Region**  
480D Enterprise Way  
Modesto, CA 95356-8718  
Tel: (209) 557-6400 FAX: (209) 557-6475

**Central Region (Main Office)**  
1990 E. Gettysburg Avenue  
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**Southern Region**  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
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OCT 04 2012

Gerardo C. Rios, Chief  
Permits Office  
Air Division  
U.S. EPA - Region IX  
75 Hawthorne St  
San Francisco, CA 94105

Re: **Proposed Authorities to Construct / Certificate of Conformity (Minor Mod)**  
**District Facility # C-447**  
**Project # C-1120336**

Dear Mr. Rios:

Enclosed for your review is the District's engineering evaluation of an application for Authorities to Construct for E & J Gallo Winery, located at 5610 E. Olive Ave. in Fresno, which has been issued a Title V permit. E & J Gallo Winery is requesting that a Certificate of Conformity, with the procedural requirements of 40 CFR Part 70, be issued with this project. The applicant requests Authority to Construct (ATC) permits for the modification of their organic material storage and composting operations for District Rule 4566 (Organic Material Composting Operations) compliance purposes.

Enclosed is the engineering evaluation of this application, a copy of the current Title V permit, and proposed Authorities to Construct # C-447-268-1 and '-269-1 with Certificate of Conformity. After demonstrating compliance with the Authorities to Construct, the conditions will be incorporated into the facility's Title V permit through an administrative amendment.

Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter. If you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Thank you for your cooperation in this matter.

Sincerely,

David Warner  
Director of Permit Services

Enclosures  
cc: Brian Clements, Permit Services

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**San Joaquin Valley Air Pollution Control District**  
**Authority to Construct Application Review**  
**Rule 4566 (Organic Material Composting Operations) Compliance**

Facility Name: E & J Gallo Winery  
Mailing Address: 5610 E. Olive Ave.  
Fresno, CA 93727

Date: September 18, 2012

Engineer: Brian Clements

Lead Engineer: Sheraz Gill

Contact Person: Phil Castro - Plant Manager

Telephone: 559-458-2417

Email: [phil.castro@ejgallo.com](mailto:phil.castro@ejgallo.com)

Application #(s): C-447-268-1 and C-447-269-1

Project #: C-1120336

Deemed Complete: March 21, 2012

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**I. PROPOSAL:**

E & J Gallo Winery requests an Authority to Construct (ATC) permit for modification of the organic material receiving, storage, and mixing operation (ATC Permit C-447-268-1) to include a permit condition to comply with the stockpile requirements of District Rule 4566 (Organic Material Composting Operations), Section 5.1.1. The facility proposes to comply with one of the following requirements within 10 days of receipt of organic materials at the facility: (a). Remove the organic material from the facility; (b). Start the active phase of composting; or (c). Cover the organic material with a waterproof cover that have at least a six-foot overlap of adjacent sheets and be securely anchored. For 10-day stockpiling, the stockpiling throughput shall be less than 100,000 wet tons/year. Emissions calculations will therefore be based on 99,999 wet-tons/year of organic material stockpiled and then composted (this material is subject to Rule 4566).

The facility also requests an ATC permit for modification of the open windrow active and curing phase organic material composting operation (ATC Permit C-447-269-1) to comply with the composting requirements of Rule 4566, Section 5.2.1. The facility proposes to include permit conditions to require at least three turns during the active-phase composting process and to install an integrated watering system to comply with the composting mitigation measures requirements for watering systems in Table 1 of Rule 4566.

These modifications are proposed solely to comply with District Rule 4566 requirements. Since there is a change to the method of operation of these organic material composting operations, these changes are modifications pursuant to District Rule 2201 (New and Modified Stationary Source Review Rule). In addition, the facility is not proposing any increases to the current receiving and processing rates due to this project.

*See Appendix B for a copy of the current Permits To Operate (PTOs).*

## II. APPLICABLE RULES:

Rule 2201: New and Modified Stationary Source Review Rule (4/21/11)  
Rule 2520: Federally Mandated Operating Permits (6/21/01)  
Rule 4101: Visible Emissions (2/17/05)  
Rule 4102: Nuisance (12/17/92)  
Rule 4202: Particulate Matter - Emission Rate (12/17/92)  
Rule 4566: Green Waste Composting and Operations (8/18/11)  
Rule 8011: General Requirements (8/19/04)  
Rule 8031: Bulk Materials (8/19/04)  
Rule 8041: Carryout and Trackout ((8/19/04)  
Rule 8061: Paved and Unpaved Roads (8/19/04)  
Rule 8071: Unpaved Vehicle/Equipment Traffic Areas (9/16/04)  
California Health & Safety Code Section 41700 (Public Nuisance)  
California Health & Safety Code Section 42301.6 (School Notice)  
Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)  
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines

## III. PROJECT LOCATION:

The facility is located at 5610 E. Olive in Fresno, CA. This project will not result in an increase in hazardous air emissions; therefore school noticing requirements of California Health and Safety Code Section 42301.6 is not required for this project.

## IV. PROCESS DESCRIPTION:

### Feedstock Organic Waste Material Receiving, Storage, & Mixing (ATC Permit C-447-268-1):

This facility stockpiles organic material for their composting operations. In order to comply with stockpile requirements of District Rule 4566 (Organic Material Composting Operations), the applicant is proposing comply with Section 5.1.1 of this rule. Please refer to Section VI of this document for a detailed description of their proposal. The applicant is not proposing any other changes to their current process due to this project. Please reference the previous application review under project #C-1080226 for a detailed description of this operation.

### Open Windrow Composting (ATC Permit C-447-269-1):

This facility performs open windrow composting of organic materials. In order to comply with the composting requirements of District Rule 4566, the applicant is proposing to comply with Section 5.2.1 of this rule. Please refer to Section VI of this document for a detailed description of their proposal. The applicant is not proposing any other changes to their current process due to this project. Please reference the previous application review under project #C-1080226 for a detailed description of this operation.

Operating Schedule & Process Rate:

The following summarizes the facility's throughputs and processing rates. **All values were proposed by the applicant for Rule 4566 compliance.**

Permit Unit '-268 (Receiving/Stockpiling):

- 1,325 wet-ton/day of organic material received.
- 10-day stockpiling limit; therefore, stockpiling throughput shall be less than 100,000 wet tons/year. Emissions calculations will be based on 99,999 wet-tons/year of organic material stockpiled and then composted (this material is subject to Rule 4566).
- 146,853 total wet-tons/year of organic material received/stockpiled (based on 378,000 yd<sup>3</sup>). Material not composted is trucked offsite and is not subject to Rule 4566.
- Average material density of 777 lb/yd<sup>3</sup>.

Permit Unit '-269 (Composting):

- Since the facility stockpiles prior to composting and the stockpiling limit is 99,999 wet-tons/year, the composting limit is indirectly 99,999 wet-tons/year.

**V. EQUIPMENT LISTING:**

'-268:

Current PTO Description:

GREEN WASTE ORGANIC MATERIAL RECEIVING, STORAGE, AND MIXING OPERATION

ATC Description:

MODIFICATION OF GREEN WASTE ORGANIC MATERIAL RECEIVING, STORAGE, AND MIXING OPERATION: TO ADD RULE 4566 COMPLIANCE MEASURES

Post Project PTO Description:

GREEN WASTE ORGANIC MATERIAL RECEIVING, STORAGE, AND MIXING OPERATION

'-269:

Current PTO Description:

OPEN WINDROW ACTIVE AND CURING PHASE GREEN WASTE COMPOSTING OPERATION

ATC Description:

OPEN WINDROW ACTIVE AND CURING PHASE GREEN WASTE COMPOSTING OPERATION: TO ADD RULE 4566 COMPLIANCE MEASURES, INCLUDING AN INTEGRATED WATERING SYSTEM

Post Project PTO Description:

OPEN WINDROW ACTIVE AND CURING PHASE GREEN WASTE COMPOSTING OPERATION WITH AN INTEGRATED WATERING SYSTEM

**VI. EMISSION CONTROL TECHNOLOGY EVALUATION:**

'268-1:

The existing green and food waste feedstock material receiving, storage, and mixing operations will produce VOC, NH<sub>3</sub> and PM<sub>10</sub> emissions. Also, there is the potential for other odorous emissions. To reduce the fugitive VOC emissions from the feedstock piles, the facility has proposed to comply with the stockpile requirements of Rule 4566, Section 5.1.1. The facility has proposed within 10 days of receipt of organic material at the facility to comply with one of the following: (a). Remove the organic material from the facility; (b). Start the active phase of composting; or (c). Cover the organic material with a waterproof cover that have at least a six-foot overlap of adjacent sheets and be securely anchored. By removing, processing, or covering the feedstock piles within 10 days of receipt of the material, the VOC emissions will be reduced when compared to the previous processing time.

A water sprinkler system will continue to be used, as needed, to control the fugitive dust (PM<sub>10</sub>) emissions during the receiving, handling, loading, and mixing of the feedstock materials. On site haul roads will be kept adequately moist to reduce fugitive dust emissions with the use of a water truck.

'-269-1:

The existing windrow composting operations will produce VOC, NH<sub>3</sub> and PM<sub>10</sub> emissions. Also, there is the potential for other odorous emissions. To reduce VOC emissions from the active-phase composting windrows the facility is proposing to comply with composting requirements of Rule 4566, Section 5.2.1.1. The facility will now implement at least three turns of the windrow piles during the active-phase process and install an integrated watering system that complies with the composting mitigation measures outlined in Table 1 of Rule 4566. As determined by from the San Joaquin Valley Air Pollution Study Agency's field study the use of a watering system will provide a 19% reduction in VOC emissions during the active phase composting process.

A water sprinkler system will continue to be used, as needed, to control the fugitive dust (PM<sub>10</sub>) emissions during the handling and turning of the window piles. Fugitive dust (PM<sub>10</sub>) emissions from the windrows will be controlled by the high moisture content of the composting material (typically 40% to 65%) and by facility water trucks when required. On site haul roads will be kept adequately moist to reduce fugitive dust emissions with the use of a water truck.

## VII. GENERAL CALCULATIONS:

### A. Assumptions:

#### '-268-1

1. 146,853 total wet-tons/year of organic material received/stockpiled (based on 378,000 yd<sup>3</sup>). Material not composted is trucked offsite and is not subject to Rule 4566.
2. 1,325 wet-ton/day of organic material received.
3. Proposed maximum stockpile storage time of 10 days for all material (composted or trucked offsite).
4. PM<sub>10</sub> will be emitted from the receiving, handling, and mixing of the green and incidental food waste feedstock organic materials.
5. VOC and NH<sub>3</sub> will be emitted from the storage of the green and incidental food waste feedstock organic materials.
6. PM<sub>10</sub> control efficiency of at least 70%<sup>(1)</sup> for handling of high moisture content material (25%) with wet spray dust suppression.
7. For feedstock organic materials receiving and transfer to storage there will be a total of 3 drop points consisting of the following: (a). 1-drop point from the receiving of the material; (b). 2-drop points from the transfer of the material from the receiving area to the storage pile.
8. For feedstock organic materials mixing there will be a total of 2 drop points consisting of the repeated lifting and dropping of the materials with a front-end loader.

#### '-269-1:

1. Material composted is limited to 99,999 ton/year since the applicant proposes a 10-day stockpile period (must be less than 100,000 ton/year to qualify for 10-days instead of 3-days).
2. VOC and NH<sub>3</sub> will be emitted from the active phase and curing phase windrows.
3. Active and curing phases average 22 and 40 days each, respectively.
4. PM<sub>10</sub> will only be emitted during the forming of the active phase windrow piles. PM<sub>10</sub> emissions during the turning of the active phase windrows and forming of the curing phase windrows are assumed to be negligible due to high moisture content of materials handled (moisture content is typically 40% to 65%).
5. For the forming of the windrow composting piles there will be a total of 2 drop points consisting of the transfer of the mixed compost materials from the mixing pile to the windrow pile.
6. VOC emissions from at least three turns of the windrow piles and use of an integrated watering system all during the active-phase composting period will reduce the VOC emissions by 19%.

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<sup>1</sup> Per AP-42, Table B.2-3 (AIRS Code 061), the average control efficiency for dust suppression with water spray is 70% for particulate matter with an aerodynamic diameter smaller than or equal to 10 microns (PM<sub>10</sub>).

**B. Emission Factors (EF):**

Pre & Post-Project Emission Factor (EF1 & EF2):

For these operations the pre and post project emission factors will not change due to this proposed project. Therefore, the EF2 will be equal to the EF1 as listed in the table below:

<b>Pre &amp; Post-Project Emission Factors (EF1 &amp; EF2)</b>		
Pollutant (Emission Source)	Uncontrolled EF1 & EF2	Source
PM <sub>10</sub> (Receiving, Mixing, & Storage)	0.00033 (lb-PM <sub>10</sub> /wet ton)	Project #: C-1101871
VOC (Stockpiles)	1.063 (lb-VOC/wet ton/day)	District Green Waste Compost Emission Factor Report (9/15/10)
NH <sub>3</sub> (Stockpiles)	0.318 (lb-NH <sub>3</sub> /wet ton/day)	Card/Schmidt, June 2008
VOC (Active Phase Windrows)	0.233 (lb-VOC/wet ton/day)	District Green Waste Compost Emission Factor Report (9/15/10)
	5.14 (lb-VOC/wet ton)	
VOC (Curing Phase Windrows)	0.014 (lb-VOC/wet ton/day)	District Green Waste Compost Emission Factor Report (9/15/10)
	0.57 (lb-VOC/wet ton)	
NH <sub>3</sub> (Active Phase Windrows)	0.017 (lb-NH <sub>3</sub> /wet ton/day)	Card/Schmidt, June 2008
	0.997 (lb-NH <sub>3</sub> /wet ton)	
NH <sub>3</sub> (Curing Phase Windrows)	0.0019 (lb-NH <sub>3</sub> /wet ton/day)	Card/Schmidt, June 2008
	0.111 (lb-NH <sub>3</sub> /wet ton)	

**C. Potential to Emit (PE) Calculations:**

**1. Pre-Project Potential to Emit (PE1):**

Pre-project daily emission (Daily PE1) calculations are only required to determine if Best Available Control Technology (BACT) is triggered for the emission units modified under this project. As determined below in Section VII.D.2. (AIPE) of this document, this project is exemption from BACT. Therefore, the daily PE1 calculations are not necessary and will not be performed for this project. Pre-project annual emissions (Annual PE1) will be calculated to determine the Quarterly Net Emissions Change (QNEC) to complete the District's PAS emissions profile screen.

**Annual PE1 Calculations:**

Annual PE1 for Permit '-268:

The annual PE1 were obtained from previous application review under project #C-1080226:

Pollutant	Annual PE1 (lb/year)
PM <sub>10</sub>	343
VOC	3,093,968
NH <sub>3</sub>	925,571

Annual PE1 for Permit '-269:

The annual PE1 were obtained from the previous application review under project #C-1080226:

Pollutant	Annual PE1 (lb/year)
PM <sub>10</sub>	137
VOC	1,187,109
NH <sub>3</sub>	230,353

**2. Post-Project Potential to Emit (PE2):**

**Daily and Annual PE2 Calculations:**

'-268-1:

PM<sub>10</sub>, VOC, and NH<sub>3</sub> Emissions from Material Receiving, Handling, Mixing, and Storage of the Organic Waste Materials:

The daily PM<sub>10</sub>, VOC, and NH<sub>3</sub> emissions will be calculated as follows based on the following:

Maximum Stockpile Storage Time: 10 days

Daily Material Receiving/Mixing Rate: 1,325 wet tons/day

Maximum Daily Stockpile Storage Weight: 1,325 wet tons/day x 10 storage days  
 = 13,250 wet-ton/day

Annual Material Receiving/Mixing/Storage Rate: 146,853 wet tons/year

Total Drop Points = 3 Drop Points (Receiving) + 2 Drop Points (Mixing)  
 = 5 Drop Points (Total)

Daily PE2<sub>PM10-Receiving/Mixing</sub> = 5 Drop Points x Receiving/Mixing Rate (wet ton/day)  
 x EF2<sub>PM10/Receiving & Mixing</sub> (lb-PM<sub>10</sub>/wet ton)

Annual PE2<sub>PM10-Receiving/Mixing</sub> = 5 Drop Points x Receiving/Mixing Rate (wet ton/year)  
 x EF2<sub>PM10/Receiving/Transfer</sub> (lb-PM<sub>10</sub>/wet ton)

Daily PE2<sub>VOC</sub> = Daily Storage Weight (wet ton/day) x Stockpile Storage Time (days)  
 x EF2<sub>VOC/Stockpiles</sub> (lb/wet ton/day)

Annual PE2<sub>VOC</sub> = Annual Storage Weight (wet ton/year)  
 x Stockpile Storage Time (days) x EF2<sub>VOC/Stockpiles</sub> (lb/wet ton/day)

Daily PE2<sub>NH3</sub> = Daily Storage Weight (wet ton/day) x Stockpile Storage Time (days)  
 x EF2<sub>NH3/Stockpiles</sub> (lb/wet ton/day)

Annual PE2<sub>NH3</sub> = Annual Storage Weight (wet ton/year)  
 x Stockpile Storage Time (days) x EF2<sub>NH3/Stockpiles</sub> (lb/wet ton/day)

Daily and Annual PE2 for ATC Permit '268-1				
Pollutant	Drop Points	Receiving/Mixing Rate	EF2	Daily & Annual PE2
PM <sub>10</sub>	5 drop points (Receiving/Mixing)	1,325 wet tons/day	0.00033 lb-PM <sub>10</sub> /wet ton	2.2 lb/day
PM <sub>10</sub>	5 drop points (Receiving/Mixing)	146,853 wet tons/year	0.00033 lb-PM <sub>10</sub> /wet ton	242 lb/year
Pollutant	Storage Days	Storage Weight	EF2	Daily & Annual PE2
VOC	10 storage days	13,250 wet tons/day	1.063 lb-VOC/wet ton/day	14,084.8 lb/day
VOC	10 storage days	146,853 wet tons/year	1.063 lb-VOC/wet ton/day	156,105 lb/year
NH <sub>3</sub>	10 storage days	13,250 wet tons/day	0.318 lb-NH <sub>3</sub> /wet ton/day	4,213.5 lb/day
NH <sub>3</sub>	10 storage days	146,853 wet tons/year	0.318 lb-NH <sub>3</sub> /wet ton/day	46,699 lb/year

'269-1:

PM<sub>10</sub>, VOC, and NH<sub>3</sub> Emissions from the Windrow Composting Piles:

The active phase composting process will be controlled with the use of an **integrated** watering system with three windrow turns which will reduce the VOC emissions by 19%. The daily PM<sub>10</sub>, VOC, and NH<sub>3</sub> emissions will be calculated as follows based on the following:

Daily Max Material Transfer Rate: 13,250 wet tons/day (entire max stockpile)  
+ 1,325 wet-tons (received that day) = 14,575 wet-tons/day

Daily Max Active-Phase Composting Weight: 13,250 + (1,325 x 22 days)  
= 42,400 wet tons

Daily Max Curing-Phase Composting Weight: 99,999 - 42,400 = 57,599 wet tons

Annual Composting Weight: 99,999 wet tons/year

Mitigation Measure Control Efficiency (CE): 19%

Daily PE<sub>2PM10</sub> = # of Drop Points × Daily Transfer Rate (wet ton/day)  
× EF<sub>2PM10/Transfer</sub> (lb-PM<sub>10</sub>/wet ton)

Annual PE<sub>2PM10</sub> = # of Drop Points × Annual Transfer Rate (wet ton/year)  
× EF<sub>2PM10/Transfer</sub> (lb-PM<sub>10</sub>/ton)

Daily PE<sub>2VOC/Windrow Active-Phase</sub> = Daily Active-Phase Composting Weight (wet ton) ×  
EF<sub>2Daily VOC/Windrows Active-Phase</sub> (lb/wet ton/day)  
× (1 - CE)

Annual PE<sub>2VOC/Windrow Active-Phase</sub> = Annual Composting Weight (wet ton/year)  
× EF<sub>2VOC/Windrow Active Phase</sub> (lb/wet ton)  
× (1 - CE)

$$\text{Daily PE}_{2\text{VOC/Windrow Curing-Phase}} = \text{Curing-Phase Composting Weight (wet ton)} \\ \times \text{EF}_{2\text{Daily VOC/Windrows Curing-Phase}} \text{ (lb/wet ton/day)}$$

$$\text{Annual PE}_{2\text{VOC/Windrow Curing-Phase}} = \text{Annual Composting Weight (wet ton/year)} \\ \times \text{EF}_{2\text{VOC/Windrow Curing Phase}} \text{ (lb/wet ton)}$$

$$\text{Daily PE}_{\text{NH}_3\text{Windrow Active-Phase}} = \text{Daily Active-Phase Composting Weight (wet ton)} \\ \times \text{EF}_{2\text{Daily NH}_3\text{Windrows Active-Phase}} \text{ (lb/wet ton/day)} \\ \times (1 - \text{CE})$$

$$\text{Annual PE}_{2\text{NH}_3\text{Windrow Active-Phase}} = \text{Annual Composting Weight (wet ton/year)} \\ \times \text{EF}_{\text{NH}_3/\text{Windrows Active-Phase}} \text{ (lb/wet ton)} \\ \times (1 - \text{CE})$$

$$\text{Daily PE}_{2\text{NH}_3\text{Windrow Curing-Phase}} = \text{Daily Curing-Phase Composting Weight (wet ton)} \\ \times \text{EF}_{2\text{Daily NH}_3/\text{Windrows Curing-Phase}} \text{ (lb/wet ton/day)}$$

$$\text{Annual PE}_{2\text{NH}_3\text{Windrow Curing-Phase}} = \text{Annual Composting Weight (wet ton/year)} \\ \times \text{EF}_{2\text{NH}_3/\text{Windrows Curing-Phase}} \text{ (lb/wet ton)}$$

<b>Daily and Annual PE2 for ATC Permit '269-1</b>				
<b>Pollutant</b>	<b>Drop Points</b>	<b>Transfer Rate</b>	<b>EF2</b>	<b>Daily &amp; Annual PE2</b>
PM <sub>10</sub>	2	14,575 wet tons/day	0.00033 lb-PM <sub>10</sub> /wet ton	9.6 lb/day
PM <sub>10</sub>	2	99,999 wet tons/year	0.00033 lb-PM <sub>10</sub> /wet ton	66 lb/year
<b>Pollutant</b>	<b>Control Efficiency (CE)</b>	<b>Composting Weight (wet-tons/day)</b>	<b>EF2 Uncontrolled</b>	<b>Daily PE2 (lb/day)</b>
VOC (Active-Phase)	0.19	42,400	0.233 lb-VOC/wet ton/day	8,002.2
VOC (Curing-Phase)	0	57,599	0.014 lb-VOC/wet ton/day	806.4
<b>Combined Daily VOC</b>				<b>8,808.6</b>
<b>Pollutant</b>	<b>Control Efficiency (CE)</b>	<b>Composting Weight (wet-tons/year)</b>	<b>EF2 Uncontrolled</b>	<b>Annual PE2 (lb/year)</b>
VOC (Active-Phase)	0.19	99,999	5.14 lb-VOC/wet ton	416,336
VOC (Curing Phase)	0	99,999	0.57 lb-VOC/wet ton	56,999
<b>Combined Annual VOC</b>				<b>473,335</b>
<b>Pollutant</b>	<b>Control Efficiency (CE)</b>	<b>Composting Weight (wet-tons/day)</b>	<b>EF2 Uncontrolled</b>	<b>Daily PE2 (lb/day)</b>
NH <sub>3</sub> (Active-Phase)	0.19	42,400	0.017 lb-NH <sub>3</sub> /wet ton/day	583.8
NH <sub>3</sub> (Curing-Phase)	0	57,599	0.0019 lb-NH <sub>3</sub> /wet ton/day	109.4
<b>Combined Daily NH<sub>3</sub></b>				<b>693.2</b>
<b>Pollutant</b>	<b>Control Efficiency (CE)</b>	<b>Composting Weight (wet-tons/year)</b>	<b>EF2 Uncontrolled</b>	<b>Annual PE2 (lb/year)</b>
NH <sub>3</sub> (Active-Phase)	0.19	99,999	0.997 lb-NH <sub>3</sub> /wet ton	80,756
NH <sub>3</sub> (Curing-Phase)	0	99,999	0.111 lb-NH <sub>3</sub> /wet ton	8,991
<b>Combined Annual NH<sub>3</sub></b>				<b>89,747</b>

**E. Facility Emissions:**

**1. Pre-Project Stationary Source Potential to Emit (SSPE1):**

SSPE1 calculations are necessary to aid the following determinations:

- If the facility is becoming a new Major Source,
- An offset threshold will be surpassed, or
- A Stationary Source Increase in Permitted Emissions (SSIPE) public notice is triggered

Pursuant to Section 4.9 of District Rule 2201, the Pre-Project Stationary Source Potential to Emit (SSPE1) is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

Since there is not an increase in potential emissions for any pollutant as a result of this project, the facility is not becoming a new Major source, an offset threshold will not be surpassed, nor will an SSIPE public notice be triggered. Therefore, the SSPE1 will not be calculated at this time.

## **2. Post-Project Stationary Source Potential to Emit (SSPE2):**

SSPE2 calculations are necessary to aid the following determinations:

- If the facility is becoming a new Major Source,
- An offset threshold will be surpassed, or
- A Stationary Source Increase in Permitted Emissions (SSIPE) public notice is triggered

Pursuant to Section 4.10 of District Rule 2201, the Post-Project Stationary Source Potential to Emit (SSPE2) is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

Since there is not an increase in potential emissions for any pollutant as a result of this project, the facility is not becoming a new Major source, an offset threshold will not be surpassed, nor will an SSIPE public notice be triggered. Therefore, the SSPE2 will not be calculated at this time.

## **3. Major Source Determination**

A Major Source Determination is necessary in order to:

- Identify new Major Sources and
- Aid Baseline Emissions (BE) determinations, for amount of offsets required calculations

Pursuant to Section 3.24 of District Rule 2201, a major source is a stationary source a Post-Project Stationary Source Potential to Emit (SSPE2), equal to or exceeding one or more of the Major Source threshold values (excluding ERCs banked onsite that have not been used onsite).

Since there is not an increase in potential emissions for any pollutant as a result of this project, the facility is not becoming a new Major source. Also, since this project is exempt from offsets pursuant to Rule 2201, Section 4.6.8, a Major Source

determination is not necessary for offset purposes. Therefore, a Major Source determination will not be made at this time.

**4. Baseline Emissions (BE):**

The BE calculation (in lb/year) is performed on a pollutant-by-pollutant basis to determine the amount of offsets required, where necessary, when the SSPE1 is greater than the offset threshold. This project is exempt from offsets pursuant to Rule 2201, Section 4.6.8. Therefore, BE calculations are not required.

**F. SB-288 Major Modification:**

SB 288 Major Modification is defined in 40 CFR Part 51.165 as "any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act."

The emissions from composting operations are fugitive as defined in Section 3.19 of District Rule 2201 and are not listed as a non-exempt fugitive source in 40 CFR 70.2 (Definitions). Therefore, the emissions from the composting operations under permits '-268-1, and '-269-1 are not included in the determination of a major source as defined in District Rule 2201, Section 3.24. Since this project only involves emissions from composting operations, the proposed project cannot trigger an SB-288 Major modification, and no further calculations are required.

**G. Federal Major Modification:**

District Rule 2201 states that a Federal Major Modification is the same as a "Major Modification" as defined in 40 CFR 51.165 and part D of Title I of the CAA.

Since the composting operations are not included in the 28 specific source categories specified in 40 CFR 51.165, the increases in fugitive emissions are not included in the Federal Major Modification determination. Since this project only involves fugitive emissions from composting operations, the proposed project cannot trigger a Federal Major Modification, no further calculations are required.

## VIII. COMPLIANCE

### Rule 2201 – New and Modified Stationary Source Review Rule:

#### A. Best Available Control Technology (BACT):

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis. Unless exempted pursuant to Section 4.2, BACT is required for the following actions: (1) Any new emissions unit with a potential to emit exceeding 2.0 pounds in any one day, (2) The relocation of an existing emissions unit from one stationary source to another with a potential to emit exceeding 2.0 pounds in any one day, (3) Modifications to an existing emissions unit with a valid Permit to Operate resulting in an Adjusted Increase in Permitted Emissions (AIPE) exceeding 2.0 pounds in any one day, and (4) Any new or modified emissions unit, in a stationary source project, which results in an SB-288 Major modification or Federal Major Modification, as defined in this rule. If the post project Stationary Source Potential to Emit (SSPE2) for Carbon Monoxide is less than 200,000 pounds per year, BACT is not required for Carbon Monoxide.

However, BACT shall not be required for the following:

4.2.3 For existing facilities, the installation or modification of an emission control technique performed solely for the purpose of compliance with the requirements of District, State or Federal air pollution control laws, regulations, or orders, as approved by the APCO, shall be exempt from Best Available Control Technology for all air pollutants, provided all of the following conditions are met:

4.2.3.1 There shall be no increase in the physical or operational design of the existing facility, except for those changes to the design needed for the installation or modification of the emission control technique itself;

4.2.3.2 There shall be no increase in the permitted rating or permitted operating schedule of the permitted unit;

4.2.3.3 There shall be no increase in emissions from the stationary source that will cause or contribute to any violation of a National Ambient Air Quality Standard, Prevention of Significant Deterioration increment, or Air Quality Related Value in Class I areas; and

4.2.3.4 The project shall not result in an increase in permitted emissions or potential to emit of more than 25 tons per year of NO<sub>x</sub>, or 25 tons per year of VOC, or 15 tons per year of SO<sub>x</sub>, or 15 tons per year of PM<sub>10</sub>, or 50 tons per year of CO.

4.2.3.5 The project shall not constitute a Federal Major Modification.

C-268-1:

The proposed modification to the green and food waste material receiving, storage, and mixing operation is solely for compliance with District Rule 4566 requirements and will only result in the facility processing, removing, or covering the feedstock piles within 10

days of receiving organic waste materials. The modification does not result in an increase in the physical or operational design or permitted limits of this operation. There is also no increase in permitted emissions for any affected pollutant. As determined in Section VII.G. of this document the proposed project does not constitute a Federal Major Modification. Therefore, the emission units under this operation are exempt from BACT requirements.

'-269-1:

The proposed modification to the open windrow active and curing phase green and food waste composting operation is also solely for compliance with District Rule 4566 requirements and will only result in the facility turning the active-phase windrows three turns during processing and to install an integrated watering system for VOC control. The modification does not result in an increase in the physical or operational design or permitted limits of this operation. There is also no increase in permitted emissions for any affected pollutant. As determined in Section VII.G. of this document the proposed project does not constitute a Federal Major Modification. Therefore, the emission units under this operation are exempt from BACT requirements.

**B. Offsets:**

Offset Applicability:

The proposed modifications are solely for compliance with Rule 4566, and are exempt from offsets if the following criteria are satisfied. Rule 2201, Section 4.6.8 provides the following exemption from offsets.

Emission offsets shall not be required for the following:

- 4.6.8 For existing facilities, the installation or modification of an emission control technique performed solely for the purpose of compliance with the requirements of District, State or Federal air pollution control laws, regulations, or orders, as approved by the APCO, shall be exempt from offset requirements for all air pollutants provided all of the following conditions are met:
- 4.6.8.1 There shall be no increase in the physical or operational design of the existing facility, except for those changes to the design needed for the installation or modification of the emission control technique itself;
  - 4.6.8.2 There shall be no increase in the permitted rating or permitted operating schedule of the permitted unit;
  - 4.6.8.3 There shall be no increase in emissions from the stationary source that will cause or contribute to any violation of a National Ambient Air Quality Standard, Prevention of Significant Deterioration increment, or Air Quality Related Value in Class I areas; and
  - 4.6.8.4 The project shall not result in an increase in permitted emissions or potential to emit of more than 25 tons per year of NO<sub>x</sub>, or 25 tons per year

of VOC, or 15 tons per year of SO<sub>x</sub>, or 15 tons per year of PM-10, or 50 tons per year of CO.

As determined above, the proposed modifications are solely for compliance with District Rule 4566 requirements. The modifications do not result in an increase in the physical or operational design or permitted limits of these operations. There are no increases in permitted emissions for any affected pollutant. Therefore, offsets are not required.

## **C. Public Notification:**

### **1. Applicability**

District Rule 2201, section 5.4, requires a public notification for the affected pollutants from the following types of projects:

- New Major Sources
- SB-288 and Federal Major Modifications
- New emission units with a PE > 100 lb/day of any one pollutant
- Modifications with SSPE1 below an offset threshold and SSPE2 above an offset threshold on a pollutant by pollutant basis  
(Existing Facility Offset Threshold Exceedance Notification)
- New stationary sources with SSPE2 exceeding offset thresholds  
(New Facility Offset Threshold Exceedance Notification)
- Any permitting action with a SSIPE exceeding 20,000 lb/yea0r for any one pollutant. (SSIPE Notice)

#### **a. New Major Source Notice Determination:**

A New Major Source is a new facility, which is also a major source. Since this is not a new facility, public noticing is not required for this project for New Major Source purposes.

#### **b. SB-288 and Federal Major Modification Notice Determination:**

As determined in Section VII.F. and G. of this document, this project does not trigger SB-288 or Federal Major Modification. Therefore, public notice is not required for SB-288 or Federal Major Modification purposes.

#### **c. PE Notification:**

As indicated in Section VII.C.2.A. (Daily PE2 Calculations) above, the proposed project will not result in the installation of new emission units with an increase in emissions of greater than 100 lb/day for any pollutant. Therefore, public noticing will be not required for PE > 100 lb/day purposes.

**d. Existing Facility - Offset Threshold Notification**

Public notification is required if the Pre-Project Stationary Source Potential to Emit (SSPE1) is increased from a level below the offset threshold to a level exceeding the emissions offset threshold, for any pollutant.

There is no increase in permitted emissions as a result of this project. Therefore, the SSPE is not increasing with this project and an offset threshold cannot be surpassed as a result of this project. A public notice will not be required for offset threshold purposes.

**e. New Facility - Offset Threshold Notification**

This is an existing facility. This section does not require a public notification.

**f. SSIPE Notification:**

An SSIPE exceeding 20,000 pounds per year for any one pollutant triggers public notice, where  $SSIPE = SSPE2 - SSPE1$ .

There is no increase in permitted emissions as a result of this project. Therefore, the SSIPE is zero for all pollutants and public notice will not be required for SSIPE purposes.

**2. Public Notice Action**

Rule 2201, Section 5.5 details the actions taken by the District when public noticing is triggered according to the application types above. As indicated above the public noticing requirements is not triggered for this project. Therefore, public notification and publication requirements as indicated in section 5.5 of this rule are not required.

**D. Daily Emission Limits:**

Daily Emissions Limitations (DELs) and other enforceable conditions are required by Section 3.16 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. Per Sections 3.16.1 and 3.16.2, the DEL must be contained in the latest Authority to Construct (ATC) permit and contained in or enforced by the latest Permit to Operate (PTO) and enforceable, in a practicable manner, on a daily basis. DELs are also required to enforce the applicability of BACT.

'-268-1:

The DELs for the organic waste material receiving, storage, and mixing operations will be based on the maximum quantity of material received along with the emission rate in pounds emitted per wet ton of material received and processed. The following permit conditions will be included on the permit:

- *The quantity of organic material received shall not exceed either of the following limits: 1,325 wet tons/day or 146,853 wet ton/year (equivalent to 378,000 cubic yards/year). [District Rule 2201]*

- *The quantity of organic waste materials stockpiled prior to composting at this facility shall be less than 100,000 wet ton/year. [District Rules 2201 and 4566]*
- *PM<sub>10</sub> emissions from the receiving, handling, and mixing of the organic waste materials shall not exceed 0.00165 lb-PM<sub>10</sub>/wet ton. [District Rule 2201]*
- *Emissions from the organic material stockpiling shall not exceed either of the following limits: 1.063 lb-VOC/wet ton or 0.318 lb-NH<sub>3</sub>/wet ton. [District Rule 2201]*

C-269-1:

Since the daily VOC emissions from the organic waste composting operations are daily average values based on a typical composting life cycle, the DELs for this permit will be based on the calculated daily emissions as determined in Section VII (General Calculations) of this document. In addition, the emissions will also be limited by the maximum quantity of material received for composting. The following permit conditions will be placed on the permit:

- *PM<sub>10</sub> emissions from the organic material composting operation shall not exceed 0.00066 lb-PM<sub>10</sub>/wet ton. [District Rule 2201]*
- *VOC emissions from the organic material composting operation shall not exceed either of the following limits: 8,808.6 lb/day or 473,335 lb/year. [District Rules 2201 and 4566]*
- *NH<sub>3</sub> emissions from the organic material composting operation shall not exceed either of the following limits: 693.2 lb/day or 89,747 lb/year. [District Rule 2201]*

## **E. Compliance Assurance**

The following measures shall be taken to ensure continued compliance with District Rules.

### **1. Source Testing**

These operations will not be utilizing control equipment, which requires source testing by District Policy APR 1705 (Source Testing Frequency). Therefore, source testing for these operations will not be required.

### **2. Monitoring**

There are no Rule 2201 monitoring requirements for these operations.

### **3. Record Keeping**

There are no Rule 2201 recordkeeping requirements for these operations. Per District Rule 4566 (Organic Material Composting Operations), these operations are subject to recordkeeping requirements. Refer to Section VIII under Rule 4566 for a discussion of the recordkeeping requirements.

There are no Rule 2201 recordkeeping requirements for these operations. Per District Rule 4566 (Organic Material Composting Operations), these operations are subject to recordkeeping requirements. Refer to Section VIII under Rule 4566 for a discussion of the recordkeeping requirements.

#### **4. Reporting**

There are no Rule 2201 reporting requirements for these operations.

#### **Rule 2520 - Federally Mandated Operating Permits**

This facility is subject to this Rule and has received their Title V Operating Permit. The proposed changes under this project are to modify existing permits for Rule 4566 compliance.

In accordance with Rule 2520, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
  - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
  - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

As discussed above, the facility has applied for a Certificate of Conformity (COC). Therefore, the facility must apply to modify their Title V permit with an administrative amendment, prior to operating with the proposed modifications. Continued compliance with this rule is expected. The facility may operate under the ATC upon submittal of the Title V administrative amendment application.

- Rule 4101 - Visible Emissions**
- Rule 4102 - Nuisance**
- Rule 4202 - Particulate Matter - Emission Rate**
- Rule 8011 - General Requirements**
- Rule 8031 - Bulk Materials**
- Rule 8041 - Carryout and Trackout**
- Rule 8061 - Paved and Unpaved Roads**
- Rule 8071 - Unpaved Vehicle/Equipment Traffic Areas**

The modified permit units are subject to a variety of requirements in fulfillment of these rules, which are expressly stated in the existing Permits to Operation (PTOs), included in Appendix B of this document. These requirements are not being modified as part of this proposed project, and the applicable permit conditions will not be changed. No further discussion is required.

### **Rule 4566 - Organic Material Composting Operations**

#### **Sections 1.0 (Purpose) and 2.0 (Applicability):**

The purpose of this rule is to limit the emissions volatile organic compounds (VOC) from composting operations. Per Section 2.0, this rule applies to composting facilities that compost and/or stockpile organic material.

This facility will stockpile and compost green and food waste organic materials. Therefore, the facility's stockpiling operation and composting operation are subject to the requirements of this rule.

#### **Section 5.1 (Stockpile Requirements):**

Section 5.1.1 requires operators of a composting operation with a total annual throughput of < 100,000 wet tons per year of organic material shall comply with one of the following within 10-days of receipt of the organic material at the facility:

- 5.1.1.1 Remove the organic material from the facility;
- 5.1.1.2 Start the active phase of composting;
- 5.1.1.3 Cover the organic material with a waterproof cover that have at least a six-foot overlap of adjacent sheets and be securely anchored; or
- 5.1.1.4 Implement an APCO approved alternative mitigation measure, not listed above.

The facility is proposing to reduce and limit their annual quantity of organic material received for composting to less than 100,000 wet tons per year to comply with Section 5.1.1 of this rule. Therefore, the following permit condition will be included on ATC permit '268-1 to enforce the requirements of this section

- *The quantity of organic material received at this facility for composting shall be less than 100,000 wet tons/year. [District Rules 2201 and 4566]*

To comply with the requirements of Section 5.1, the facility proposes to perform one of the following within 10 days of receiving organic materials at the facility: (a). Remove

the organic material; (b). Start the active phase of composting; or (c). Cover the organic material with a waterproof cover that have at least a six-foot overlap of adjacent sheets and be securely anchored. The following condition will be included in ATC permit '-268-1 to assure compliance with the requirements of this section:

- *The operator shall perform one of the following to organic material within 10 days of receipt at the facility to satisfy the stockpile requirements: (a). Remove the organic material from the facility; (b). Place the organic material in the active-phase composting windrow and start active phase composting; (c). Cover the organic material with a waterproof cover that have at least a six-foot overlap of adjacent sheets and be securely anchored. [District Rules 2201 and 4566]*

### **Section 5.2 (Composting Requirements):**

Section 5.2.1 requires an operator of a composting operation with a total throughput of < 200,000 wet tons per year of organic material shall comply with Section 5.2.1.1 or Section 5.2.1.2 during the active phase of composting.

5.2.1.1 For windrow composting only, implement at least three turns during the active-phase and one of the mitigation measures for the Watering System in Table 1.

5.2.1.2 Implement an APCO and EPA approved alternative mitigation measure that demonstrates at least a 19% reduction (by weight) in VOC emissions.

The facility is proposing to comply with section 5.2.1 via the 19% reduction (by weight) in VOC emissions through the use of their integrated watering system.

The facility is proposing to comply with Section 5.2.1 with the use of an integrated watering system. The following condition will be included in ATC permit '-269-1 to assure compliance with the requirements of this section:

- *The operator shall install, maintain, and utilize an integrated watering system to apply water to the surface of each active-phase composting windrow. For windrows that will be turned on the same day and will require the same water volume, mechanically turn the first windrow while operating the integrated watering system. Within three hours after turning the first windrow, the operator shall test the windrow for adequate water by taking a sample of the organic material in the windrow and passing a "Ball Test". The "Ball Test" is performed by taking a sample of the compostable material between the vertical midpoint and the peak of the windrow, at least three inches below the outer surface. There should be at least enough water to form a ball when compressed by hand, but the ball may break when tapped. If the ball crumbles during the hand pressure test, apply additional water and mechanically turn the same windrow, then retest until the material passes the ball test. Subsequent windrows shall not be turned until the initial windrow passes the ball test. Utilize the established water volume for the remaining windrows to be turned with the same water volume on the same day. Repeat this method for windrows that will be turned with a different water application rate. If a rain event occurs prior to turning the windrow, application of additional water to the surface of the windrow will*

*not be required if the material passes the ball test as previously described. [District Rule 4566]*

## **Section 6.0 (Administrative Requirements)**

### Facility Emission Mitigation Plan (FEMP):

Section 6.1 requires an operator to submit a Facility Emission Mitigation Plan (FEMP) along with an Authority to Construct (ATC) application, in accordance with Rule 2010 (Permits Required), to incorporate the approved mitigation measures from the facility's FEMP as applicable permit conditions. The operator has satisfied these requirements with the submission of their FEMP along with the ATC permit applications for this project.

### Recordkeeping:

Section 6.3.2 requires an operator subject to this rule to maintain an operations log. The operations log shall include the following information on a daily basis: (a). The date the organic material arrives on site; (b). The type of organic material received on site; and (c). The weight (in wet tons) of each type of organic material received on site.

Section 6.3.3 requires an operator of a composting facility subject to the stockpile requirements to maintain an operations log, which includes the following information on a daily basis: (a). The date of which each stockpile was initially formed; (b). The date and action taken on each stockpile to satisfy the stockpile requirements; and (c). Other information necessary to determine compliance with the requirements.

The following permit conditions apply to assure compliance with the recordkeeping requirements of Sections 6.3.2 and 6.3.3:

- *A daily operations log shall be maintained and shall include the following:*
    - (a) The date, type, and weight (in wet tons) of each organic material received;*
    - (b) The date each stockpile was initially formed;*
    - (c) The date and action taken on each stockpile to satisfy the stockpile requirements;*
    - (d) Total quantity and type of each organic material stored for composting (in wet tons);*
    - (e) Total quantity and type of each organic material mixed for composting (in wet tons);*
    - (f) Any other information necessary to demonstrate compliance with Rule 4566.*
- [District Rules 1070 & 4566]*

Section 6.3.4.1 requires an operator of a composting facility subject to the composting requirements for a watering system to maintain an operations log, which includes the following information on a daily basis: (a). Record the date and time the organic material from the windrow was tested for compliance; (b). Indicate whether the windrow passes the ball test and, if applicable, all corrective actions taken; (c). Record the date and time

the windrow was turned; (d). Record other information necessary to determine compliance with the requirements.

The following permit condition will be used to assure compliance with the recordkeeping requirements of Section 6.3.4.1:

- *A daily operations log shall be maintained and shall include the following:*
    - (a) *The date and time the organic material from the windrow was tested for adequate water content using the "ball test" and indicate if the material passed the ball test. If the windrow material did not pass the ball test indicate the corrective actions taken;*
    - (b) *The date and time each windrow was turned;*
    - (c) *Total quantity of organic material transferred from the stockpiles to the active-phase composting windrows (in wet tons);*
    - (d) *Total quantity of active-phase composting windrows (in wet tons);*
    - (e) *Total quantity of curing-phase composting windrows (in wet tons);*
    - (f) *Any other information necessary to demonstrate compliance with Rule 4566.*
- [District Rules 1070 & 4566]*

Section 6.3.5 requires an operator to retain all applicable records, as specified in the recordkeeping requirements of Section 6.0, on site for a period of five years and the records shall be made available to the APCO upon request. The following permit condition will be used to assure compliance with the requirements of Section 6.3.5:

- *{Modified 3246} All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request.*  
*[District Rules 1070 & 4566]*

## **Section 7.0 (Compliance Schedule)**

Section 7.1 requires operators of a composting facility subject to the composting operation requirements of this rule to submit a complete Facility Emission Mitigation Plan (FEMP) and Authority-to-Construct (ATC) application that complies with all applicable requirements of this rule by the dates indicated in Table 2 of this rule.

For operators proposing to comply with the watering system requirements the compliance date is February 18, 2012. This facility has satisfied this requirement with the submission of their completed FEMP and ATC permit applications under this project.

Section 7.2.1 requires operators of a composting operation subject to the stockpile requirements shall be in full compliance with all stockpile requirements on and after August 18, 2012. The following permit condition applies to assure compliance with the compliance schedule requirements of Section 7.2.1:

- *The facility shall be in full compliance with all applicable stockpile requirements of District Rule 4566 on and after August 18, 2012. [District Rule 4566]*

Section 7.3.1 requires an operator of a composting operation with a total throughput of less than 200,000 wet tons per year of organic material to be in full compliance with the

applicable Watering System requirements of Section 5.2.1 by August 18, 2012. The following permit condition applies to assure compliance with the compliance schedule requirements of Section 7.3.1:

- *The facility shall be in full compliance with all applicable composting requirements of District Rule 4566 for a Watering System on and after August 18, 2012. [District Rule 4566]*

**Conclusion:**

Conditions will be incorporated into these ATC permits in order to ensure compliance with each section of this rule. Therefore, compliance with District Rule 4566 requirements is expected.

**California Health & Safety Code 41700 (Health Risk Assessment)**

The District's Risk Management Policy for Permitting New and Modified Sources (APR 1905, 3/2/01) requires that a risk management review be performed for all projects that result in any increases in emissions of hazardous air pollutants. This project is to modify existing permits with no increase in hazardous air pollutants. Therefore, a risk management review is not required.

**California Health & Safety Code 42301.6 (School Notice)**

The facility is proposing to modified these permit units, which will not result in an increase in hazardous air emissions; therefore school noticing requirements of California Health and Safety Code Section 42301.6 is not required for this project.

**California Environmental Quality Act (CEQA)**

The California Environmental Quality Act (CEQA) requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The San Joaquin Valley Unified Air Pollution Control District (District) adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities.
- Identify the ways that environmental damage can be avoided or significantly reduced.
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible.
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

The District performed an Engineering Evaluation (this document) for the proposed project and determined that all project specific emission units are exempt from Best Available Control Technology (BACT) requirements. Furthermore, the District conducted a Risk Management Review and concludes that potential health impacts are less than significant.

Issuance of permits for emissions units not subject to BACT requirements and with health impact less than significant is a matter of ensuring conformity with applicable District rules and regulations and does not require discretionary judgment or deliberation. Thus, the District concludes that this permitting action constitutes a ministerial approval. Section 21080 of the Public Resources Code exempts from the application of CEQA those projects over which a public agency exercises only ministerial approval. Therefore, the District finds that this project is exempt from the provisions of CEQA.

To ensure that issuance of these permits does not conflict with any conditions imposed by any local agency permit processes, the following permit condition will be listed on each ATC permit as follows:

- *This permit does not authorize the facility to operate without the required permits from other local, state or federal agency and does not authorize the violation of any conditions established for this facility in the Conditional Use Permit (CUP), Special Use Permit (SUP), Site Approval, Site Plan Review (SPR), or other approval documents issued by a local, state, or federal agency. [District Rules 2070 and 2080, and Public Resources Code 21000-21177: California Environmental Quality Act].*

## IX. RECOMMENDATION

Compliance with all applicable rules and regulations is expected. Issue Authority to Construct (ATC) permits '-268-1 and '-269-1 subject to the permit conditions on the attached draft Authority to Construct permits in Appendix A.

## X. BILLING INFORMATION

Permit Number	Fee Schedule	Fee Description	Previous Fee Schedule
C-447-268-1	3020-06	Miscellaneous	3020-06
C-447-269-1	3020-06	Miscellaneous	3020-06

## XI. APPENDICES

- Appendix A: Draft Authority to Construct (ATC) Permits
- Appendix B: Current Permits to Operate (PTOs)
- Appendix C: QNEC
- Appendix D: Emissions Profiles

# **APPENDIX A**

## **Draft ATC Permits**

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: DRAFT  
**DRAFT**

**PERMIT NO:** C-447-268-1

**LEGAL OWNER OR OPERATOR:** E & J GALLO WINERY  
**MAILING ADDRESS:** 5610 E OLIVE AVE  
FRESNO, CA 93727

**LOCATION:** 5610 E OLIVE AVE  
FRESNO, CA 93727

**EQUIPMENT DESCRIPTION:**  
MODIFICATION OF GREEN WASTE ORGANIC MATERIAL RECEIVING, STORAGE (STOCKPILING), AND MIXING  
OPERATION: TO ADD RULE 4566 COMPLIANCE MEASURES

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. This permit does not authorize the facility to operate without the required permits from other local, state or federal agency and does not authorize the violation of any conditions established for this facility in the Conditional Use Permit (CUP), Special Use Permit (SUP), Site Approval, Site Plan Review (SPR), or other approval documents issued by a local, state or federal agency. [District Rules 2070 & 2080, and Public Resources Code 21000-21177: California Environmental Quality Act]
4. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. {15} No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
6. All materials for processing shall be maintained adequately moist to prevent visible emissions in excess of 20% opacity [District Rule 4101]

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT.** This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director, APCO

**DAVID WARNER**, Director of Permit Services  
C-447-268-1: Sep 18 2012 2:07PM -- CLEMENTIS : Joint Inspection NOT Required

7. The permittee is allowed to receive the following wastes for the composting operation: green waste, residential food waste, and construction wood waste. Green waste is defined as any organic waste material generated from gardening, agriculture, or landscaping activities including, but not limited to grass clippings, leave, tree and shrub trimmings, and plant remains. Residential food waste is defined as table scraps, vegetable and fruit peelings, meat, bones and fish, egg shells, solid dairy products, coffee grounds, bread and toast, paper waste including, but not limited to, napkins, towels, plates, coffee filters, and tea bags. Construction wood waste is defined as any untreated wood materials, including but not limited to, lumber, paper, and cardboard from construction. [District Rule 2010]
8. The permittee is prohibited to receive the following wastes for the composting operation: biosolids, animal manure, and poultry litter. Biosolids is defined as organic material resulting from the treatment of sewage sludge or wastewater. Animal manure is defines as non-human animal excretions and waste, including, but not limited to, dried solids and urine from cows, cattle, or swine. Poultry litter is defined as poultry excretions and waste, including, but not limited to dried solids and urine from chickens, turkeys, geese, or ducks. [District Rule 2010]
9. The quantity of organic material received shall not exceed either of the following limits: 1,325 wet tons/day or 146,853 wet ton/year (equivalent to 378,000 cubic yards/year). [District Rule 2201]
10. The quantity of organic material stockpiled at this facility for composting shall be less than 100,000 wet tons/year. [District Rules 2201 and 4566]
11. Emissions from organic material stockpiling shall not exceed either of the following limits: 1.063 lb-VOC/wet ton/day or 0.318 lb-NH<sub>3</sub>/wet ton/day. [District Rule]
12. PM<sub>10</sub> emissions from the receiving, handling, and mixing of the organic waste materials shall not exceed 0.00165 lb-PM<sub>10</sub>/wet ton. [District Rule 2201]
13. Within 10 days of receipt of the organic material to be composted, the permittee shall perform one of the following: (a). Remove the organic material from the facility; (b). Place the organic material in the active-phase composting windrow and start active phase composting; (c). Cover the organic material with a waterproof cover that have at least a six-foot overlap of adjacent sheets and be securely anchored. [District Rules 2201 and 4566]
14. A daily operations log shall be maintained and shall include the following: (a) The date, type, and weight (in wet tons) of each organic material received; (b). The date each stockpile was initially formed; (c). The date and action taken on each stockpile to satisfy the stockpile requirements; (d). Total quantity and type of each organic waste material stored for composting (in wet tons); (e). Total quantity and type of each organic waste material mixed for composting (in wet tons); and (f). Any other information necessary to demonstrate compliance with Rule 4566. [District Rules 2201 and 4566]
15. A cumulative annual log shall be maintained and shall indicate the total quantity and type of each organic waste material received (in wet tons). The records shall be updated at least monthly. [District Rule 2201]
16. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 2201 and 4566]
17. The facility shall be in full compliance with all applicable stockpile requirements of District Rule 4566 on and after August 18, 2012. [District Rule 4566]

DRAFT

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: DRAFT  
**DRAFT**

**PERMIT NO:** C-447-269-1

**LEGAL OWNER OR OPERATOR:** E & J GALLO WINERY  
**MAILING ADDRESS:** 5610 E OLIVE AVE  
FRESNO, CA 93727

**LOCATION:** 5610 E OLIVE AVE  
FRESNO, CA 93727

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF OPEN WINDROW ACTIVE AND CURING PHASE GREEN WASTE COMPOSTING OPERATION: TO ADD RULE 4566 COMPLIANCE MEASURES, INCLUDING AN INTEGRATED WATERING SYSTEM

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. This permit does not authorize the facility to operate without the required permits from other local, state or federal agency and does not authorize the violation of any conditions established for this facility in the Conditional Use Permit (CUP), Special Use Permit (SUP), Site Approval, Site Plan Review (SPR), or other approval documents issued by a local, state, or federal agency. [District Rules 2070 and 2080, and Public Resources Code 21000-21177: California Environmental Quality Act]
4. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. {15} No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
6. All materials for processing shall be maintained adequately moist to prevent visible emissions in excess of 20% opacity. [District Rule 4101]

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director, APCO

**DAVID WARNER**, Director of Permit Services  
C-447-269-1: Sep 16 2012 2:05PM - CLEMENTB : Joint Inspection NOT Required

7. PM10 emissions from the organic material composting operation shall not exceed 0.00066 lb-PM10/wet ton. [District Rule 2201]
8. The total quantity of organic materials composted shall be less than 100,000 wet tons/year. [District Rules 2201 and 4566]
9. VOC emissions from the organic material composting operation shall not exceed either of the following limits: 8,808.6 lb/day or 473,335 lb/year. [District Rules 2201 and 4566]
10. NH3 emissions from the organic material composting operation shall not exceed either of the following limits: 693.2 lb/day or 89,747 lb/year. [District Rule 2201]
11. The operator shall install, maintain, and utilize an integrated watering system to apply water to the surface of each active-phase composting windrow. For windrows that will be turned on the same day and will require the same water volume, mechanically turn the first windrow while operating the integrated watering system. Within three hours after turning the first windrow, the operator shall test the windrow for adequate water by taking a sample of the organic material in the windrow and passing a "Ball Test". The "Ball Test" is performed by taking a sample of the compostable material between the vertical midpoint and the peak of the windrow, at least three inches below the outer surface. There should be at least enough water to form a ball when compressed by hand, but the ball may break when tapped. If the ball crumbles during the hand pressure test, apply additional water and mechanically turn the same windrow, then retest until the material passes the ball test. Subsequent windrows shall not be turned until the initial windrow passes the ball test. Utilize the established water volume for the remaining windrows to be turned with the same water volume on the same day. Repeat this method for windrows that will be turned with a different water application rate. If a rain event occurs prior to turning the windrow, application of additional water to the surface of the windrow will not be required if the material passes the ball test as previously described. [District Rule 4566]
12. A daily operations log shall be maintained and shall include the following: (a). The date and time the organic material from the windrow was tested for adequate water content using the "Ball Test" and indicate if the material passed the ball test. If the windrow material did not pass the ball test indicate the corrective action taken; (b). The date and time each windrow was turned; (c). Total quantity of organic material transferred from the feedstock piles to the active-phase composting windrows (in wet tons); (d). Total quantity of active phase composting piles utilized onsite (in wet tons); (e). Total quantity of curing phase composting piles utilized onsite (in wet tons); and (f). Any other information necessary to demonstrate compliance with Rule 4566. [District Rules 4566 and 1070]
13. A cumulative annual log shall be maintained and shall include the following: (a). Total quantity of active-phase composting piles utilized onsite (in wet tons); (b). Total quantity of curing phase composting piles utilized onsite (in wet tons). The records shall be updated at least monthly. [District Rules 2201 and 1070]
14. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 2201, 4566, and 1070]
15. The facility shall be in full compliance with all applicable composting requirements of District Rule 4566 for a Watering System on and after August 18, 2012. [District Rule 4566]

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## **APPENDIX B**

### **Current PTOs**

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-447-268-0

**EXPIRATION DATE:** 06/30/2016

**EQUIPMENT DESCRIPTION:**

GREEN WASTE ORGANIC MATERIAL RECEIVING, STORAGE, AND MIXING OPERATION

## PERMIT UNIT REQUIREMENTS

---

1. All materials for processing shall be maintained adequately moist to prevent visible emissions in excess of 20% opacity. [District Rule 4101]
2. The permittee is allowed to receive the following wastes for the composting operation: green waste, residential food waste, and construction wood waste. Green waste is defined as any organic waste material generated from gardening, agriculture, or landscaping activities including, but not limited to, grass clippings, leaves, tree and shrub trimmings, and plant remains. Residential food waste is defined as table scraps, vegetable and fruit peelings, meat, bones and fish, egg shells, solid dairy products, coffee grounds, bread and toast, paper waste including, but not limited to, napkins, towels, plates, coffee filters, and tea bags. Construction wood waste is defined as any untreated wood materials, including but not limited to, lumber, paper, and cardboard from construction. [District Rule 2010]
3. The permittee is prohibited to receive the following wastes for the composting operation: biosolids, animal manure, and poultry litter. Biosolids is defined as organic material resulting from the treatment of sewage sludge or wastewater. Animal manure is defined as non-human animal excretions and waste, including, but not limited to, dried solids and urine from cows, cattle, or swine. Poultry litter is defined as poultry excretions and waste, including, but not limited to, dried solids and urine from chickens, turkeys, geese, or ducks. [District Rule 2010]
4. The quantity of green waste materials received shall not exceed 1,325 wet tons in any one day and 207,900 wet tons in any one calendar year (based on the Solid Waste Facility Permit, SWIS #: 10-AA-0182). [District Rule 2010]
5. A daily log shall be maintained and shall include the following: (a). Total quantity and type of each organic waste material received (in wet tons); (b). Total quantity and type of each organic waste material mixed for composting (in wet tons). [District Rule 1070]
6. A cumulative annual log shall be maintained and shall include the following: (a). Total quantity and type of each organic waste material received (in wet tons); (b). Total quantity and type of each organic waste material mixed for composting (in wet tons). The records shall be updated at least monthly. [District Rule 1070]
7. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
8. Whenever any portion of the site becomes inactive, the permittee shall restrict access and periodically stabilize any disturbed surface to comply with the conditions for a stabilized surface as defined in District Rule 8011. [District Rules 8071 and 8011]
9. This permit does not authorize the facility to operate without the required permits from other local, state, or federal agency and does not authorize the violation of any conditions established for this facility in the Conditional Use Permit (CUP), Special Use Permit (SUP), Site Approval, Site Plan Review (SPR), or other approval documents issued by a local, state, or federal agency. [District Rules 2070 and 2080]

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-447-269-0

**EXPIRATION DATE:** 06/30/2016

**EQUIPMENT DESCRIPTION:**

OPEN WINDROW ACTIVE AND CURING PHASE GREEN WASTE COMPOSTING OPERATION

## PERMIT UNIT REQUIREMENTS

---

1. All materials for processing shall be maintained adequately moist to prevent visible emissions in excess of 20% opacity. [District Rule 4101]
2. A daily log shall be maintained and shall include the following: (a). Total quantity and type of each organic waste material received (in wet tons); (b). Total quantity and type of each organic waste material mixed for composting (in wet tons). [District Rule 1070]
3. A cumulative annual log shall be maintained and shall include the following: (a). Total quantity and type of each organic waste material received (in wet tons); (b). Total quantity and type of each organic waste material mixed for composting (in wet tons). The records shall be updated at least monthly. [District Rule 1070]
4. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]
5. Whenever any portion of the site becomes inactive, the permittee shall restrict access and periodically stabilize any disturbed surface to comply with the conditions for a stabilized surface as defined in District Rule 8011. [District Rules 8071 and 8011]
6. This permit does not authorize the facility to operate without the required permits from other local, state, or federal agency and does not authorize the violation of any conditions established for this facility in the Conditional Use Permit (CUP), Special Use Permit (SUP), Site Approval, Site Plan Review (SPR), or other approval documents issued by a local, state, or federal agency. [District Rules 2070 and 2080]

These terms and conditions are part of the Facility-wide Permit to Operate.

## **APPENDIX C**

### **QNEC**

**Quarterly Net Emissions Change (QNEC):**

The QNEC is calculated solely to establish emissions that are used to complete the District's PAS emission profile for each permit unit. It is assumed that each unit's annual emission changes are evenly distributed throughout the year. Therefore, for the proposed modifications:

$$\text{QNEC (lb/qtr)} = [\text{Annual PE2 (lb/year)} - \text{Annual PE1 (lb/year)}] \div 4 \text{ Quarters/year}$$

<b>QNEC for ATC Permit '-268-1</b>			
<b>Pollutant</b>	<b>Annual PE2 (lb/year)</b>	<b>Annual PE1 (lb/year)</b>	<b>QNEC* (lb/qtr)</b>
PM <sub>10</sub>	242	343	-25.25
VOC	156,105	3,093,968	-734,465.75

<b>QNEC for ATC Permit '-269-1</b>			
<b>Pollutant</b>	<b>Annual PE2 (lb/year)</b>	<b>Annual PE1 (lb/year)</b>	<b>QNEC (lb/qtr)</b>
PM <sub>10</sub>	66	137	-17.75
VOC	473,335	1,187,109	-178,443.5

\*Whole numbers entered into emission profile.

## **APPENDIX D**

### **Emissions Profiles**

Permit #: C-447-268-1	<b>Last Updated</b>
Facility: E & J GALLO WINERY	07/31/2012 CLEMENTB

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	242.0	0.0	156105.0
Daily Emis. Limit (lb/Day)	0.0	0.0	2.2	0.0	14084.8
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	-25.0	0.0	-734465.0
Q2:	0.0	0.0	-25.0	0.0	-734466.0
Q3:	0.0	0.0	-25.0	0.0	-734466.0
Q4:	0.0	0.0	-26.0	0.0	-734466.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: C-447-269-1	Last Updated
Facility: E & J GALLO WINERY	07/31/2012 CLEMENTB

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	66.0	0.0	473335.0
Daily Emis. Limit (lb/Day)	0.0	0.0	9.6	0.0	8808.6
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	-17.0	0.0	-178443.0
Q2:	0.0	0.0	-18.0	0.0	-178443.0
Q3:	0.0	0.0	-18.0	0.0	-178444.0
Q4:	0.0	0.0	-18.0	0.0	-178444.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					