



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

MAY - 6 2010

Rick Spurlock
Rio Bravo Fresno
3350 S Willow Ave
Fresno, CA 93725

**Re: Notice of Preliminary Decision - Title V Permit Renewal
District Facility # C-1820
Project # C-1084429**

Dear Mr. Spurlock:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Rio Bravo Fresno for its biomass cogeneration facility located at 3350 S Willow Ave in Fresno, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 30-day comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,

A handwritten signature in black ink, appearing to read "David Warner", with a long, sweeping horizontal line extending to the right.

David Warner
Director of Permit Services

Attachments
C: Sajjad Ahmad, Permit Services Engineer

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

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San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

MAY - 6 2010

Gerardo C. Rios, Chief
Permits Office (AIR-3)
U.S. EPA - Region IX
75 Hawthorne St.
San Francisco, CA 94105

**Re: Notice of Preliminary Decision – Title V Permit Renewal
District Facility # C-1820
Project # C-1084429**

Dear Mr. Rios:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Rio Bravo Fresno for its biomass cogeneration facility located at 3350 S Willow Ave in Fresno, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 45-day comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,

David Warner
Director of Permit Services

Attachments

C: Sajjad Ahmad, Permit Services Engineer

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San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

MAY - 6 2010

Mike Tollstrup, Chief
Project Assessment Branch
Air Resources Board
P O Box 2815
Sacramento, CA 95812-2815

**Re: Notice of Preliminary Decision - Title V Permit Renewal
District Facility # C-1820
Project # C-1084429**

Dear Mr. Tollstrup:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Rio Bravo Fresno for its biomass cogeneration facility located at 3350 S Willow Ave in Fresno, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 30-day comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,

David Warner
Director of Permit Services

Attachments
C: Sajjad Ahmad, Permit Services Engineer

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Executive Director/Air Pollution Control Officer

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Fresno Bee

**NOTICE OF PRELIMINARY DECISION
FOR THE PROPOSED RENEWAL OF
THE FEDERALLY MANDATED OPERATING PERMIT**

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District solicits public comment on the proposed renewal of the Federally Mandated Operating Permit to Rio Bravo Fresno for its biomass cogeneration facility located at 3350 S Willow Ave in Fresno, California.

The District's analysis of the legal and factual basis for this proposed action, project #C-1084429, is available for public inspection at http://www.valleyair.org/notices/public_notices_idx.htm and the District office at the address below. There are no emission changes associated with this proposed action. This will be the public's only opportunity to comment on the specific conditions of the proposed renewal of the Federally Mandated Operating permit. If requested by the public, the District will hold a public hearing regarding issuance of this renewed permit. For additional information, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900. Written comments on the proposed renewed permit must be submitted within 30 days of the publication date of this notice to DAVID WARNER, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 1990 E. GETTYSBURG AVE, FRESNO, CALIFORNIA 93726-0244.

**SAN JOAQUIN VALLEY
AIR POLLUTION CONTROL DISTRICT**

**Title V Permit Renewal Evaluation
Rio Bravo Fresno
C-1820**

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TITLE V PERMIT RENEWAL EVALUATION
Biomass Cogeneration

Engineer: Sajjad Ahmad
Date: April 16, 2010

Facility Number: C-1820
Facility Name: Rio Bravo Fresno
Mailing Address: 3350 S Willow Ave
Fresno, CA 93725

Contact Name: Rick Spurlock
Phone: (559) 264-4575

Responsible Official: Rick Spurlock
Title: Vice President and Plant Manager

Project #: C-1084429
Deemed Complete: January 8, 2009

I. PROPOSAL

Rio Bravo Fresno (Rio Bravo) was issued a Title V permit on January 13, 2000. As required by District Rule 2520, the applicant is requesting a permit renewal. The existing Title V permit shall be reviewed and modified to reflect all applicable District and federal rules updated, removed, or added since the issuance of the initial Title V permit.

The purpose of this evaluation is to provide the legal and factual basis for all updated applicable requirements and to determine if the facility will comply with these updated requirements. It also specifically identifies all additions, deletions, and/or changes made to permit conditions or equipment descriptions.

II. FACILITY LOCATION

Rio Bravo is located at 3350 S Willow Ave in Fresno.

III. EQUIPMENT LISTING

A detailed facility printout listing all permitted equipment at the facility is included as Attachment C.

IV. GENERAL PERMIT TEMPLATE USAGE

The applicant is not proposing to use any model general permit templates as a part of this Title V renewal project.

V. SCOPE OF EPA AND PUBLIC REVIEW

The applicant is not requesting any model general permit templates. Therefore, all federally enforceable conditions in this current Title V permit will be subject to EPA and public review.

VI. FEDERALLY ENFORCEABLE REQUIREMENTS

A. Rules Updated

- District Rule 2020, Exemptions
(amended July 21, 1994 ⇒ amended September 21, 2006)
- District Rule 2201, New and Modified Stationary Source Review Rule
(amended December 19, 2002) ⇒ amended September 21, 2006)
- District Rule 2520, Federally Mandated Operating Permits
(adopted June 15, 1995 ⇒ amended June 21, 2001)
- District Rule 4101, Visible Emissions
(adopted May 21, 1992 ⇒ amended February 17, 2005)
- District Rule 4601, Architectural Coatings
(amended December 17, 1992 ⇒ amended December 17, 2009)
- 40 CFR Part 60 Subpart Db, Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units

B. Rules Removed

- District Rule 8020, 8030, and 8060, Fugitive Dust (PM₁₀) Emissions (amended April 25, 1996). These rules were removed on November 15, 2001 and were replaced with District Rules 8021, 8031, and 8061.

C. Rules Added

- District Rule 8011, General Requirements (adopted November 15, 2001 and amended August 19, 2004)
- District Rule 8021, Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities (adopted November 15, 2001 and amended August 19, 2004)
- District Rule 8031, Bulk Materials (adopted November 15, 2001 and amended August 19, 2004)
- District Rule 8041, Carryout and Trackout (adopted November 15, 2001 and amended August 19, 2004)
- District Rule 8051, Open Areas (adopted November 15, 2001 and amended August 19, 2004)
- District Rule 8061, Paved and Unpaved Roads (adopted November 15, 2001 and amended August 19, 2004)
- District Rule 8071, Unpaved Vehicle/Equipment Traffic Areas (adopted November 15, 2001 and amended September 16, 2004)
- 40 CFR Part 64, Compliance Assurance Monitoring (CAM)

D. Rules Not Updated

- District Rule 1070, Inspections (amended December 17, 1992)
- District Rule 1080, Stack Monitoring (amended December 17, 1992)
- District Rule 1081, Source Sampling (amended December 16, 1993)
- District Rule 1100, Equipment Breakdown (amended December 17, 1992)

- District Rule 4201, Particulate Matter Concentration (amended December 17, 1992)
- District Rule 4301, Fuel Burning Equipment (amended December 17, 1992)
- District Rule 4801, Sulfur Compounds (amended December 17, 1992)
- 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos
- 40 CFR Part 82, Subparts B and F, Stratospheric Ozone

VII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

For each Title V source, the District issues a single permit that contains the Federally Enforceable requirements, as well as the District-only requirements. The District-only requirements are not a part of the Title V Operating Permits. The terms and conditions that are part of the facility's Title V permit are designated as "Federally Enforceable Through Title V Permit".

For this facility, the following are not federally enforceable and will not be discussed in further detail:

A. Rules Not Updated

District Rule 4102, Nuisance (as amended December 17, 1992)

For this facility, condition 42 of the facility-wide requirements C-1820-0-3 is based on the rule listed above and is not Federally Enforceable through Title V.

VIII. PERMIT REQUIREMENTS

The purpose of this evaluation is to review changes to federally enforceable requirements; therefore, this compliance section will only address rules that have been amended or added since the issuance of the initial Title V permit.

A. District Rule 1100 – Equipment Breakdown

Although Rule 1100 is by itself not federally enforceable, it is referenced as one of the rules on which three federally enforceable conditions are based.

Conditions #1, 2, and 11 on the facility-wide permit PTO C-1820-0-3 ensure facility-wide compliance with the requirements of this rule.

B. District Rule 1080 – Stack Monitoring

This rule grants the APCO the authority to request the installation, use, maintenance, and inspection of continuous monitoring equipment.

Renewal PTO C-1820-1-24:

Condition #6 and 12 from the current PTO was replaced by two conditions #41 and 44 on the Renewal PTO.

Condition #7 from the current PTO was included as condition #43 on the Renewal PTO.

Conditions #10 and 11 from the current PTO were revised and included as condition #45 and 46 on the Renewal PTO. The revision consisted of explicitly referencing the Continuous Opacity Monitor (COM) in the condition. Conditions #51 through 53 from the current PTO were included as conditions #47 through 49 on the Renewal PTO. Fresno County Rule 108 reference was removed as this rule has been superseded by SIP approved District Rule 1080.

C. District Rule 1081 – Source Sampling

The purpose of this rule is to ensure that there are adequate and safe facilities for use in sampling to determine compliance. This rule also specifies methods and procedures for source testing, sample collection, and compliance determination.

Renewal PTO C-1820-1-24:

Compliance with the requirements of this rule is demonstrated with the permit conditions # 45, 48, and 49 on the renewal PTO.

Renewal PTO C-1820-5-12:

Compliance with the requirements of this rule is demonstrated with the permit condition # 11 on the renewal PTO.

D. District Rule 2020 - Exemptions

District Rule 2020 lists equipment which is specifically exempt from obtaining permits and specifies recordkeeping requirements to verify such exemptions. The amendments to this rule do not have any affect on current permit requirements and will therefore not be addressed in this evaluation.

E. District Rule 2201 - New and Modified Stationary Source Review Rule

District Rule 2201 has been amended since this facility's initial Title V permit was issued. This Title V permit renewal does not constitute a modification per section 3.26, defined as an action including at least one of the following items:

- 1) Any change in hours of operation, production rate, or method of operation of an existing emissions unit, which would necessitate a change in permit conditions.
- 2) Any structural change or addition to an existing emissions unit which would necessitate a change in permit conditions. Routine replacement shall not be considered to be a structural change.
- 3) An increase in emissions from an emissions unit caused by a modification of the Stationary Source when the emissions unit is not subject to a daily emissions limitation.
- 4) Addition of any new emissions unit which is subject to District permitting requirements.

- 5) A change in a permit term or condition proposed by an applicant to obtain an exemption from an applicable requirement to which the source would otherwise be subject.

Therefore, the updated requirements of this rule are not applicable to the permits being renewed as a part of this project.

F. District Rule 2520 - Federally Mandated Operating Permits

This rule was amended to incorporate several administrative corrections, clarify rule language, and add procedures for implementing compliance schedules. The only amendments to this rule that will have an effect on current permit requirements are the corrections to Section 9 rule references, as described in the following table:

Old Rule Section	Corrected Rule Section
9.3	9.2
9.4	9.3
9.5	9.4
9.6	9.5
9.7	9.6
9.8	9.7
9.9	9.8
9.10	9.9
9.11	9.10
9.12	9.11
9.13	9.12
9.14	9.13
9.15	9.14
9.16	9.15
9.17	9.16
9.18	9.17
9.19	9.18

Rule 2520, Section 6.4.4, "Other Changes Not Requiring Title V Permit Amendment," allowed the permittee to implement changes, including the addition of new emissions units, without triggering the permit modification or amendment requirements until the time of Title V permit renewal, provided the conditions described in Sections 6.4.4.1 through 6.4.4.2 were met.

All Permits:

- Mapping or identification of specific permit conditions that have been updated due to the change in the reference sections of this Rule is not necessary. Every District Rule 2520 section reference on each permit has been updated according to the table above.

G. District Rule 4101 - Visible Emissions

District Rule 4101 has been submitted to the EPA to replace SIP approved Rule 401 (all counties of the SJVUAPCD). EPA made a preliminary determination that District Rule 4101 is "more stringent" than the county versions previously referenced, per correspondence dated August 20, 1996.

Section 5.0 prohibits the discharge of any air contaminant for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart; or is of such opacity as to obscure an observer's view to a degree equal to or greater than the smoke described in Section 5.1 of Rule 4101.

Condition 22 of the facility-wide requirements of C-1820-0-3 ensures compliance.

H. Rule 4352 – Solid Fuel Fired Boilers, Steam Generators and Process Heaters

The purpose of this rule is to limit emissions of oxides of nitrogen (NO_x) and carbon monoxide (CO) from solid fuel fired boilers, steam generators and process heaters. This rule applies to any boiler, steam generator or process heater fired on solid fuel. Heat may be supplied by liquid or gaseous fuels for start-ups, shutdowns, and during other flame stabilization periods, as deemed necessary by the owner/operator.

This rule applies to permit unit C-1820-1 only.

Renewal PTO C-1820-1-24:

Section 5.1 limits the NO_x at 115 ppmvd at 3%O₂ and CO emissions to 400 ppmvd at 3% O₂ for this type of combustor under 'All Others' fuel type.

Condition #16 on the current PTO states the NO_x NSR emission limit as not to exceed 0.08 lb/MMBtu, 660 lb/day, nor 110 tons/year, which can be shown to be more stringent than the limits in Section 5.1 of this rule:

First these emissions limits are converted in terms of lb-NOx/hr as follows:

$$\frac{0.08 \text{ lb} \cdot \text{NO}_x}{\text{MMBtu}} \times \frac{352 \text{ MMBtu}}{\text{hr}} = \frac{28.16 \text{ lb} - \text{NO}_x}{\text{hr}}$$

$$\frac{660 \text{ lb} \cdot \text{NO}_x}{\text{day}} \times \frac{1 \text{ day}}{24 \text{ hr}} = \frac{27.50 \text{ lb} - \text{NO}_x}{\text{hr}}$$

$$\frac{110 \text{ tons} - \text{NO}_x}{\text{year}} \times \frac{2,000 \text{ lb}}{\text{ton}} \times \frac{1 \text{ year}}{365 \text{ days}} \times \frac{1 \text{ day}}{24 \text{ hr}} = \frac{25.11 \text{ lb} - \text{NO}_x}{\text{hr}}$$

Second the highest of the three numbers, 28.16 lb-NOx/hr, will be used to demonstrate that these limits are more stringent than the limits in Section 5.1 of this rule. F-factor for biomass is taken from a similar unit C-825-5 = 9,973 dscf/MMBtu:

$$\frac{28.16 \text{ lb} \cdot \text{NO}_x}{\text{hr}} \times \frac{1 \text{ lb} \cdot \text{mol}}{46 \text{ lb} \cdot \text{NO}_2} \times \frac{379.5 \text{ ft}^3 \text{ NO}_x}{\text{lb} \cdot \text{mol}} \times \frac{1 \text{ hr}}{352 \text{ MMBtu}} \times \frac{1 \text{ MMBtu}}{9,973 \text{ dscf}} \times \frac{(20.9\% - 3.0\%)}{20.9\%} =$$

$$5.67 \times 10^{-5} \text{ scf NO}_x/\text{dscf exhaust} = 56.7 \text{ ppmv NO}_x \text{ at } 3\% \text{ O}_2$$

Therefore, the current condition #16 meets the requirements of Section 5.1 and will be included as condition #8 on the renewal permit.

Condition #17 on the current PTO states the CO NSR emission limit as not to exceed 22 lb/hr, 528 lb/day, nor 46 tons/year. The hourly emissions rate of 22 lb-CO/hr, will be used to demonstrate that these limits are more stringent than the limits in Section 5.1 of this rule. F-factor for biomass is taken from a similar unit C-825-5 = 9,973 dscf/MMBtu:

$$\frac{22.0 \text{ lb} \cdot \text{CO}}{\text{hr}} \times \frac{1 \text{ lb} \cdot \text{mol}}{28 \text{ lb} \cdot \text{NO}_2} \times \frac{379.5 \text{ ft}^3 \text{ CO}}{\text{lb} \cdot \text{mol}} \times \frac{1 \text{ hr}}{352 \text{ MMBtu}} \times \frac{1 \text{ MMBtu}}{9,973 \text{ dscf}} \times \frac{(20.9\% - 3.0\%)}{20.9\%} =$$

$$7.27 \times 10^{-5} \text{ scf CO/dscf exhaust} = 73 \text{ ppmv CO at } 3\% \text{ O}_2$$

Therefore, the current condition #17 meets the requirements of Section 5.1 and will be included as condition #9 on the renewal permit.

In addition, condition #54 on the current PTO refers to the Tier 1 emission limits for CO that were effective until December 31, 2006. This condition is obsolete and will be removed and CO Tier 2 emission limits will be included on condition #9 on the renewal permit as follows:

- Except during startup periods, the carbon monoxide emissions from the fluidized bed combustor shall not exceed 400 ppmv @ 3% O₂, 22 lb/hour, 528 lb/day, or 46 tons/year. [District NSR Rule and District Rule 4352, 5.1]

Section 5.2 states the following:

All NO_x and CO emission limits shall be based on a block 24-hour average. A violation of the emission limits as measured by the test methods listed in Section 6.4 shall constitute a violation of this rule.

The rule defines a block 24-hour average as follows:

Block 24-hour Average: the arithmetic average of the hourly NO_x emission rates of a unit as measured over 24 one-hour periods, daily, from 12:00 AM to 11:59 PM, excluding periods of system calibration.

The test methods in Section 6.4 are source test methods, and are not conducted on a 24-hour basis. Moreover, it would be unprecedented to require the source test start exactly at midnight and continue for 24 hours.

In addition, Section 5.5 (see below) only requires CEMS for NO_x, not CO.

Therefore, the following condition will be added to on the Renewal PTO as condition #42:

- Compliance with the daily NO_x emission limit shall be based on a block 24-hour averaging period using CEM system data. [District Rule 4352, 5.2 and 40 CFR 60.44b(i)]

Section 5.3 specifies the requirements pertaining to start-up and shutdown operation.

Condition #20 of the current PTO defines the start-up period in accordance with the previous version of the rule. Three new conditions will be added to the Renewal PTO containing the start-up and shut down provisions of the latest amendment of Rule 4253. Conditions #12 through 14 on the Renewal PTO will satisfy the requirements of Section 5.3.

Section 5.4 allows units that operate at less than 50% of the rated heat input (RHI) to apply for a NO_x and/or CO emissions limit above the emissions limit specified in Section 5.1. There are no current or newly proposed conditions for limiting the heat input to less than 50% of the RHI.

Section 5.5 requires the use of a Continuous Emissions Monitoring system (CEM) to monitor and record NO_x concentrations, CO₂ or O₂ concentrations, as well as the NO_x emission rate for units using ammonia injection as a NO_x control technique. This section also specifies that the CEM systems be operated, maintained, and calibrated pursuant to the requirements of 40 CFR 60.7 (c) and 60.13. CEM systems must also satisfy the Performance Specifications of 40 CFR 60 Appendix B and the Relative Accuracy Test Audit of Appendix F.

Conditions #12 on the current PTO at least in part satisfy the requirements of Section 5.5. This condition will be modified and placed as condition #41 on the Renewal PTO.

Section 6.1 requires the submission of an emissions control plan (ECP) identifying the type of emission controls to be applied and a construction schedule, or source tests, in accordance with Section 6.4, sufficient to demonstrate that the unit is currently in compliance with the emission limits of this rule.

The District has the most recent source test results from December 2008 on file which demonstrate compliance with the emissions limits rule. Therefore, the requirements of this section are satisfied.

Section 6.2 requires the maintenance of a monthly operating log which includes (1) type and quantity of fuel used; (2) the higher heating value (hhv) of each fuel as determined by section 6.4, or as certified by a third party fuel supplier.

Conditions #5 and #30 on the current PTO require the daily record of the type and quantity of fuel used. These conditions from the current PTO were included as conditions #64 and 65 on the Renewal PTO and a Rule 4352, Section 6.2.1 reference was added.

However, none of the current permit conditions require an operating log containing the higher heating values of the fuels used. Therefore, the following new condition #63 will appear on the Renewal PTO:

- Permittee shall record on a monthly basis the higher heating value of all fuels used. [District Rule 4352, 6.2.1]

Section 6.2.2 requires records required by Section 6.2.1 be kept and maintained on-site for five years. Condition #3 on current PTO requires a five-year record keeping but only refers to the amount of "Ashvantage" anti-slag additive used. Therefore, this condition will be modified and included as condition # 62 on the renewal PTO and the following new condition #66 will appear on the Renewal PTO:

- All records required by this permit shall be retained on site for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 2520, 9.4.2 and 4352, 6.2.2]

Section 6.3.1 requires compliance source testing for NOx and CO at least once every 12 months. Condition #43 on the current PTO satisfies this requirement. This condition will be included as condition #36 on the renewal PTO.

Section 6.3.2 requires all emission measurements to be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. Section 6.3.3 requires that no compliance determination be established within two hours after a period in which fuel flow to the unit is zero, or is shut off for 30 minutes or longer.

The current PTO does not have any condition to satisfy these requirements. Therefore, the following new condition #38 will appear on the Renewal PTO.

- All emissions measurements during a source test shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No compliance determination shall be established within two hours after a period in which fuel flow to the unit is zero, or is shut off for 30 minutes or longer. [District Rule 4352, 6.3.2, 6.3.3]

Section 6.4 lists the approved test methods. Condition #43 (NOx, CO, SOx, PM, and PM10 test methods) on the current PTO satisfies Section 6.4. This condition is added as condition # 36 on the renewal PTO.

In addition, the current PTO does not have any condition for higher heating value test methods. Therefore, the following condition is included as condition #37 on the Renewal PTO:

- The higher heating value of all solids fuels shall be certified by a third-party supplier or determined by ASTM Method E711 or other test method(s) with prior written approval of the APCO, ARB, and EPA. [District Rule 4352, 6.4]

I. District Rule 4601 - Architectural Coatings

This rule limits the emissions of VOCs from architectural coatings. It requires limiting the application of any architectural coating to no more than what is listed in the Table of Standards (Section 5.0). This rule further specifies labeling requirements, coatings thinning recommendations, and storage requirements.

The following changes were included in the latest rule amendment that resulted in adding new permit requirements and/or revising current permit requirements:

- The tables outlining the VOC content of different specialty coatings has been largely replaced with the Table of Standards in Section 5.0.
- New labeling, reporting, test methodology and other requirements have been incorporated into the rule in order to allow ARB to administer the Averaging Program as detailed in Section 8.0.
- Current District Rule 4601 (amended 12/17/09) has not been SIP approved. Attachment D contains the streamlining of the SIP approved District Rule 4601 (10/31/01) to the current District Rule 4601 to show the current rule is as stringent if not more than the SIP approved version.

Conditions 23, 24 and 25 of the requirements for this revised facility wide permit C-1820-0-3 will assure compliance with the requirements of this rule.

J. District Rule 8011 - General Requirements

The purpose of Regulation VIII (Fugitive PM₁₀ Prohibitions) is to reduce ambient concentrations of fine particulate matter (PM₁₀) by requiring actions to prevent, reduce or mitigate anthropogenic fugitive dust emissions. The Rules contained in this Regulation have been developed pursuant to United States Environmental Protection Agency guidance for Serious PM₁₀ Nonattainment Areas. The rules are applicable to specified anthropogenic fugitive dust sources. Fugitive dust contains PM₁₀ and particles larger than PM₁₀. Controlling fugitive dust missions when visible emissions are detected will not prevent all PM₁₀ emissions, but will substantially reduce PM₁₀ emissions.

The provisions of this rule are applicable to specified outdoor fugitive dust sources. The definitions, exemptions, requirements, administrative requirements, recordkeeping requirements, and test methods set forth in this rule are applicable to all Rules under Regulation VIII (Fugitive PM₁₀)

Prohibitions) of the Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District.

Conditions 29 through 34 of the facility-wide requirements C-1820-0-3 will ensure compliance with these requirements.

K. District Rule 8021 - Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities

The purpose of this rule is to limit fugitive dust emissions from construction, demolition, excavation, extraction, and other earthmoving activities.

This rule applies to any construction, demolition, excavation, extraction, and other earthmoving activities, including, but not limited to, land clearing, grubbing, scraping, travel on site, and travel on access roads to and from the site. This rule also applies to the construction of new landfill disposal sites or modification to existing landfill disposal sites prior to commencement of landfilling activities.

Section 5.0 requires that no person shall perform any construction, demolition, excavation, extraction, or other earthmoving activities unless the appropriate requirements in sections 5.1 and 5.2 are sufficiently implemented to limit VDE to 20% opacity. In addition to the requirements of this rule, a person shall comply with all other applicable requirements of Regulation VIII.

Condition 29 of the facility-wide requirements C-1820-0-3 will ensure compliance with these requirements.

L. District Rule 8031 - Bulk Materials

The purpose of this rule is to limit fugitive dust emissions from the outdoor handling, storage, and transport of bulk materials.

This rule applies to the outdoor handling, storage, and transport of any bulk material.

Section 5.0 requires that no person shall perform any outdoor handling, storage, and transport of bulk materials unless the appropriate requirements in Table 8031-1 of this rule are sufficiently implemented to limit VDE to 20% opacity or to comply with the conditions for a stabilized surface as defined in Rule 8011. In addition to the requirements of this rule, a person shall comply with all other applicable requirements of Regulation VIII.

Condition 30 of the facility-wide requirements C-1820-0-3 will ensure compliance with these requirements.

M. District Rule 8041 - Carryout and Trackout

The purpose of this rule is to limit fugitive dust emissions from carryout and trackout.

This rule applies to all sites that are subject to Rules 8021 (Construction, Demolition, Excavation, Extraction, and other Earthmoving Activities), 8031 (Bulk Materials), and 8071 (Unpaved Vehicle and Equipment Traffic Areas) where carryout or trackout has occurred or may occur.

Section 5.0 requires that an owner/operator shall sufficiently prevent or cleanup carryout and trackout as specified in sections 5.1 through 5.8. In addition to the requirements of this rule, a person shall comply with all other applicable requirements of Regulation VIII. The use of blower devices, or dry rotary brushes or brooms, for removal of carryout and trackout on public roads is expressly prohibited. The removal of carryout and trackout from paved public roads does not exempt an owner/operator from obtaining state or local agency permits which may be required for the cleanup of mud and dirt on paved public roads.

Condition 31 of the facility-wide requirements C-1820-0-3 will ensure compliance with these requirements.

N. District Rule 8051 - Open Areas

The purpose of this rule is to limit fugitive dust emissions from open areas.

This rule applies to any open area having 3.0 acres or more of disturbed surface area, that has remained undeveloped, unoccupied, unused, or vacant for more than seven days.

Section 5.0 requires that whenever open areas are disturbed or vehicles are used in open areas, the owner/operator shall implement one or a combination of control measures indicated in Table 8051-1 to comply with the conditions of a stabilized surface at all times and to limit VDE to 20% opacity. In addition to the requirements of this rule, a person shall comply with all other applicable requirements of Regulation VIII.

Condition 32 of the facility-wide requirements C-1820-0-3 will ensure compliance with these requirements.

O. District Rule 8061 - Paved and Unpaved Roads

The purpose of this rule is to limit fugitive dust emissions from paved and unpaved roads by implementing control measures and design criteria.

This rule applies to any new or existing public or private paved or unpaved road, road construction project, or road modification project.

Condition 33 of the facility-wide requirements C-1820-0-3 will ensure compliance with these requirements.

P. District Rule 8071 - Unpaved Vehicle/Equipment Traffic Area

The purpose of this rule is to limit fugitive dust emissions from unpaved vehicle and equipment traffic areas by implementing control measures and design criteria.

This rule applies to any unpaved vehicle/equipment traffic area of 1.0 acre or larger.

Condition 34 of the facility-wide requirements C-1820-0-3 will ensure compliance with these requirements.

Q. 40 CFR Part 60 Subpart Db—Standard of Performance for Industrial-Commercial-Institutional Steam Generating Units

Subpart Db applies to each steam generating unit that commences construction, modification, or reconstruction after June 19, 1984, and that has a heat input capacity from fuels combusted in the steam generating unit of greater than 100 MMBtu/hr.

This subpart was amended in January 28, 2009 to add compliance alternatives for owners/operators of certain affected sources, to eliminate the opacity standard for certain facilities voluntarily using PM CEMS, and to correct technical and editorial errors.

1. C-1820-1-24 – 28.5 MW Power Generation System with a 352 MMBtu/hr Circulating Fluidized-Bed Biomass Boiler:

- Conditions 41 through 45, and 64 assure compliance with the requirements of this rule.

R. 40 CFR Part 64-CAM

40 CFR Part 64 requires Compliance Assurance Monitoring (CAM) for units that meet the following three criteria:

- 1) the unit must have an emission limit for the pollutant;
- 2) the unit must have add-on controls for the pollutant; these are devices such as flue gas recirculation (FGR), baghouses, and catalytic oxidizers; and
- 3) the unit must have a pre-control potential to emit of greater than the major source thresholds.

1. C-1820-1-24 – 28.5 MW Power Generation System with a 352 MMBtu/hr Circulating Fluidized-Bed Biomass Boiler:

This permit unit has emissions limits for NO_x, SO_x, PM₁₀, CO, and VOC but it does not have add-on controls for SO_x, CO, and VOC emissions. Therefore, this permit unit is not subject to CAM for SO_x, CO, and VOC emissions.

The boiler has an electrostatic precipitator (ESP) for PM₁₀ control, and an ammonia injection system for control of NO_x. These are add-on controls. However, the boiler is equipped with a continuous emissions monitor (CEM) for NO_x; therefore, the boiler is exempt from CAM requirements for NO_x.¹

To determine CAM applicability for PM₁₀ emissions, the pre-control potential to emit for PM₁₀ is calculated as follow:

Current PTO limit for filterable PM₁₀ = 5.8 lb-PM₁₀/hr (controlled)

The annual controlled PM₁₀ emissions per year = 5.8 lb-PM₁₀/hr × 24 hr/day × 365 day/yr = 50,808 lb-PM₁₀/yr.

With the typical ESP control efficiency being 99% or greater, the pre-control potential to emit for PM₁₀ for the boiler may be estimated as follows:

Controlled PM₁₀ = (1 – 0.99) pre-control PM₁₀

Pre-control PM₁₀ = controlled PM₁₀ / (1 – 0.99)

Pre-control PM₁₀ = 50,808 lb-PM₁₀/yr / (1 – 0.99)

Pre-control PM₁₀ = 5,080,800 lb-PM₁₀/yr

¹ Per FYI 89, Addressing CAM in Title V Permitting Actions, if the unit has a CEM system for the pollutants for which the facility is considered a Major Source, CAM is not applicable and the equipment is exempt from CAM requirements.

The Major Source threshold for PM₁₀ is 140,000 lb-PM₁₀/yr.

Since the pre-control potential to emit for PM₁₀ exceeds the Major Source threshold for PM₁₀, PM₁₀ emissions from this permit unit will be subject to CAM requirements. Although the unit is equipped with a continuous opacity monitor (COM), this device is not regarded as equivalent to CEM for PM₁₀, and so the unit is still subject to CAM requirements for PM₁₀.²

Compliance with CAM for PM₁₀ will be through the establishment of an acceptable range of primary and secondary current and voltage readings for the electrostatic precipitator (ESP) during each annual PM₁₀ source testing and comparing the daily monitoring of the ESP voltage and current with the established acceptable range.

- Conditions 44, 45, and 50 through 55 assure compliance with the requirements of this rule.

2. C-1820-2-6 – Fuel Receiving and Unloading Operation

This permit unit does not have an emissions limit. Therefore, the permit unit is not subject to CAM.

3. C-1820-3-4 – Fuel Handling System

This permit unit does not have an emissions limit. Therefore, the permit unit is not subject to CAM.

4. C-1820-4-3 – One Multiclone Mechanical Dust Collector

This permit unit does not have an emissions limit. Therefore, the permit unit is not subject to CAM.

5. C-1820-5-12 – 238 KVA Research Cottrel Electrostatic Precipitator

This permit unit does not have an emissions limit. Therefore, the permit unit is not subject to CAM.

² Per FYI 89, Addressing CAM in Title V Permitting Actions, Continuous Opacity Monitors (COMs) may be used in a CAM plan, but they are not considered CEMs for particulates; therefore, equipment with COMs may not be exempted from the requirements of CAM. Appropriate opacity ranges must be established for these units based on source tests for particulates should the applicant wish to use COMs as a part of a CAM plan.

6. C-1820-6-6 – Ash Collection System

This unit has two baghouses for control of PM10 emissions. Annual controlled emissions as calculated in project C-1021754 are:

The annual controlled PM10 emissions per year = 1,055 lb-PM10/yr.

With the typical baghouse control efficiency being 99% or greater, the pre-control potential to emit for PM10 for the boiler may be estimated as follows:

Controlled PM10 = $(1 - 0.99)$ pre-control PM10

Pre-control PM10 = controlled PM10 / $(1 - 0.99)$

Pre-control PM10 = 1,055 lb-PM10/yr / $(1 - 0.99)$

Pre-control PM10 = 105,500 lb-PM10/yr

The Major Source threshold for PM10 is 140,000 lb-PM10/yr.

Since this unit does not have a pre-control potential to emit for PM10 greater than the Major Source threshold for PM10; CAM is not applicable to this unit.

7. C-1820-8-3 – Cooling Tower

This permit unit does not have an emissions limit. Therefore, the permit unit is not subject to CAM.

8. C-1820-11-1 – Sand and Limestone Receiving and Storage Operation

This unit has one baghouse for control of PM10 emissions. Current PTO limits the monthly operation of the unit not to exceed 48 hours and a PM10 emission rate of 0.141 lb/hr.

Annual controlled emissions are calculated as:

The annual controlled PM10 emissions per year = 0.141 lb-PM10/hr × 48 hr/month × 12 month/yr = 81 lb-PM10/yr.

With the typical baghouse control efficiency being 99% or greater, the pre-control potential to emit for PM10 for the boiler may be estimated as follows:

Controlled PM10 = $(1 - 0.99)$ pre-control PM10

Pre-control PM10 = controlled PM10 / $(1 - 0.99)$

Pre-control PM10 = 81 lb-PM10/yr / (1 – 0.99)

Pre-control PM10 = 8,122 lb-PM10/yr

The Major Source threshold for PM10 is 140,000 lb-PM10/yr.

Since this unit does not have a pre-control potential to emit for PM10 greater than the Major Source threshold for PM10; CAM is not applicable to this unit.

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

These regulations apply to demolition or renovation activity, as defined in 40 CFR 61.141. 40 CFR Section 61.150 of this Subpart was amended September 18, 2003, and condition 35 of S-1127-0-1 assures compliance with the requirements.

T. 40 CFR Part 82, Subparts B and F, Stratospheric Ozone

These regulations apply to servicing motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC). Sections of this regulation were amended in 2004 and 2008, and conditions 27 and 28 of S-1127-0-1 assure compliance with the requirements.

IX. PERMIT SHIELD

A permit shield legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Title V permit. Compliance with the terms and conditions of the Operating Permit is considered compliance with all applicable requirements upon which those conditions are based, including those that have been subsumed.

A. Requirements Addressed by Model General Permit Templates

The applicant is not requesting to use any model general permit templates for this Title V renewal project.

B. Requirements not Addressed by Model General Permit Templates

There are no existing permit shields on the current PTO nor has Rio Bravo proposed any new permit shields on the renewal PTO's.

X. PERMIT CONDITIONS

See Attachment A - Draft Renewed Title V Operating Permit.

XI. ATTACHMENTS

- A. Draft Renewed Title V Operating Permit
- B. Previous Title V Operating Permit
- C. Detailed Facility List
- D. Current District Rule 4601 SIP Comparison

ATTACHMENT A

Draft Renewed Title V Operating Permit

San Joaquin Valley Air Pollution Control District

FACILITY: C-1820-0-3

EXPIRATION DATE: 11/30/2009

FACILITY-WIDE REQUIREMENTS

1. {2285} The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. {2286} The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. {2287} The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. {2288} Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (3/21/02). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. {2289} The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.12.1] Federally Enforceable Through Title V Permit
6. {2290} A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. {2291} Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. {2292} The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name: RIO BRAVO FRESNO
Location: 3350 S WILLOW AVE, FRESNO, CA 93725
C-1820-0-3: Apr 30 2010 4:43PM - AHMADS

9. {2293} The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
10. {2294} The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. {2295} Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. {2296} If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
13. {2297} It shall not be a defense for a 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 the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. {2298} The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. {2299} The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. {2300} The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. {2301} The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. {2302} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. {2303} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. {2304} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. {2305} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE
 These terms and conditions are part of the Facility-wide Permit to Operate.

22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (2/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
23. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in the Table of Standards of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. All VOC-containing materials for architectural coatings subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. {2310} With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. {2311} If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. {2312} If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR 82, Subpart B. [40 CFR 82, Subpart B] Federally Enforceable Through Title V Permit
29. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/04) or Rule 8011 (8/19/04). [District Rule 8021 and 8011] Federally Enforceable Through Title V Permit
30. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/04) or Rule 8011 (8/19/04). [District Rule 8031 and 8011] Federally Enforceable Through Title V Permit
31. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/04) or Rule 8011 (8/19/04). [District Rule 8041 and 8011] Federally Enforceable Through Title V Permit
32. Whenever open areas are disturbed or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/04) or Rule 8011 (8/19/04). [District Rule 8051 and 8011] Federally Enforceable Through Title V Permit
33. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/04) or Rule 8011 (8/19/04). [District Rule 8061 and Rule 8011] Federally Enforceable Through Title V Permit
34. Any unpaved vehicle/equipment area that anticipates more than 75 vehicle trips per day shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 100 vehicle trips per day shall comply with the requirements of Section 5.1.2 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/04) or Rule 8011 (8/19/04). [District Rule 8071 and Rule 8011] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

35. {2319} Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit
36. {2320} The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. {2321} The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. {2322} When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. {2323} Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), and Rule 111 (Kern, Tulare, Kings). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601, sections 5.1, 5.2, 5.3, and 5.8 (12/17/09); 8021 (8/19/04); 8031 (8/19/04); 8041 (8/19/04); 8051 (8/19/04); 8061 (8/19/04); and 8071 (9/16/04). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin January 1, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520, 9.5.2] Federally Enforceable Through Title V Permit
42. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
43. When applicable to 40 CFR Part 68, a subject facility shall submit to the proper authority a Risk Management Plan, and comply with all the requirements of Program 1, 2 or 3 when mandated by the regulation. [40 CFR 68] Federally Enforceable Through Title V Permit

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

DRAFT

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1820-1-24

EXPIRATION DATE: 11/30/2009

EQUIPMENT DESCRIPTION:

352 MMBTU/HR CIRCULATING FLUIDIZED-BED BIOMASS COMBUSTOR USED TO PRODUCE STEAM FOR ELECTRICAL POWER GENERATION (28.5 MW), WITH ONE COOLING TOWER, ONE AIR PREHEATER, ONE BARETUBE ECONOMIZER, AND TWO 900 AND ONE 700 HP FANS

PERMIT UNIT REQUIREMENTS

1. No more than 500 lb/day of "Ashvantage" anti-slag additive shall be used in this combustor. [District Rule 2201] Federally Enforceable Through Title V Permit
2. In the event that the use of "Ashvantage" anti-slag additive causes a violation of any applicable requirement of this permit, the operator shall immediately cease usage of the anti-slag additive. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The fuel consumption in the fluidized bed combustor shall not exceed 36 tons at 30% moisture in any one hour. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Ammonia shall be injected into the fluidized bed combustor as necessary to meet the limits in these conditions and whenever the combustor is in full operation. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Filterable PM10 emissions from the exhaust of the electrostatic precipitator shall not exceed 5.8 lb/hr, and condensable PM10 emissions shall not exceed 17.4 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Combustion contaminants shall not exceed 10 lb/hr. Combustion contaminants are defined as particulate matter discharged into the atmosphere from the burning of any kind of material containing carbon in a free or combined state. Lab analysis testing shall be performed during each source test to determine the total amount of non-combustion contaminants, which shall be subtracted from the total particulate measured during the annual PM performance test to determine the total combustion contaminants. [District Rule 4301] Federally Enforceable Through Title V Permit
7. The SOx emissions (calculated as SO2) from the exhaust of the fluidized bed combustor shall not exceed 10.0 lb/hour nor 240 lb/day. [District NSR Rule, District Rule 4301] Federally Enforceable Through Title V Permit
8. Except during startup periods, the NOx emissions (measured as NO2) from the exhaust of the fluidized bed combustor shall not exceed 0.08 lb/MMBTU, 660 lb/day, or 110 tons per year. [District NSR Rule, District Rules 4352, 5.1 and 4301] Federally Enforceable Through Title V Permit
9. Except during startup periods, the carbon monoxide emissions from the fluidized bed combustor shall not exceed 400 ppmv @ 3% O2, 22 lb/hour, 528 lb/day, or 46 tons/year. [District NSR Rule and District Rule 4352, 5.1] Federally Enforceable Through Title V Permit
10. During the startup periods, the NOx emissions (measured as NO2) from the exhaust of the fluidized bed combustor shall not exceed 0.16 lb/MMBTU, 660 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
11. During startup periods, the carbon monoxide emissions from the fluidized bed combustor shall not exceed 44 lb/hour, 528 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

12. Start-up operation is defined as the period of time during which a unit is heated to the operating temperature and pressure from a shutdown status. Shutdown operation is defined as the period of time during which a unit is taken from operational to nonoperational status by allowing it to cool down from its operating temperature and pressure to an ambient temperature. [District Rule 4352, 3.15, 3.18, and 5.3] Federally Enforceable Through Title V Permit
13. The duration of each start-up shall not exceed 96 hours. The duration of each shut down shall not exceed twelve (12) hours. [District Rule 4352, 5.3.1 and 5.3.2] Federally Enforceable Through Title V Permit
14. The emission control system shall be in operation and emissions shall be minimized insofar as technologically feasible during start-up or shutdown. [District Rule 4352, 5.3.3] Federally Enforceable Through Title V Permit
15. The VOC emissions from the exhaust of the fluidized bed combustor shall not exceed 10.4 lb/hour nor 250 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
16. The concentration of filterable PM10 in the exhaust from the electrostatic precipitator shall not exceed 0.010 gr/dscf corrected to 12% CO2. [District NSR Rule and District Rule 4201] Federally Enforceable Through Title V Permit
17. The concentration of ammonia in the exhaust of the fluidized bed combustor shall not exceed 25 ppmv at 3% O2. [District NSR Rule] Federally Enforceable Through Title V Permit
18. The electrostatic precipitator shall be operated in a manner so as to minimize the emissions of particulate matter whenever the fluidized bed combustor is fired. [District NSR Rule] Federally Enforceable Through Title V Permit
19. Only alfalfa, barley, beanstraw, corn, orchard prunings, vineyard prunings, oats, wheat, and forest residues shall be used as offset creditable fuels. [District NSR Rule] Federally Enforceable Through Title V Permit
20. Only grape stems, grape pumice, almond shells, walnut shells, construction wood waste, urban wood waste, and up to 1,500 pounds per quarter of confiscated drugs shall be used as non-creditable fuels. [District NSR Rule] Federally Enforceable Through Title V Permit
21. Fuels shall not be painted, oiled or stained. [District NSR Rule] Federally Enforceable Through Title V Permit
22. The NOx emission factor used to calculate emission offset credits for orchard and vineyard wastes shall be 4.3 lb NOx per ton, for forest residue shall be 4.0 lb NOx per ton and for all other permitted agricultural wastes shall be 4.26 lb NOx per ton. [District NSR Rule] Federally Enforceable Through Title V Permit
23. Open-burn emission factors used to determine the quantity of offsets available from the diversion of biomass (as defined in District Rule 2201, Section 3.10, 4/25/02 version) from open-burning are listed in District Policy SSP 2005 "Open Burn Emission Factors". [District NSR Rule] Federally Enforceable Through Title V Permit
24. The owner/operator shall verify all emissions and related data and make the verifications available upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
25. The owner/operator shall provide certification for all fuel which is assigned offset credit. [District NSR Rule] Federally Enforceable Through Title V Permit
26. The owner/operator shall submit written contracts between the owner/operator and all fuel suppliers annually to the District for approval. [District NSR Rule] Federally Enforceable Through Title V Permit
27. Agreements between each fuel supplier and the owner/operator shall be considered as part of the permit to operate after District approval. [District NSR Rule] Federally Enforceable Through Title V Permit
28. The owner/operator shall be responsible for ensuring that emission credits are properly evaluated according to the provisions of the agreements with fuel suppliers. [District NSR Rule] Federally Enforceable Through Title V Permit
29. The owner/operator shall project and use the proper mix of fuels to ensure that all emissions are offset as required with credits from the use of creditable fuels. [District NSR Rule] Federally Enforceable Through Title V Permit
30. The emission credits for the use of creditable fuels shall be calculated using the protocol approved in the District's December 9, 1999 correspondence to the facility. [District NSR Rule] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

31. Emission offset credit will be calculated using the formula $EC(y) = CO(y-1) + \text{Summation } (1/DF(i) \times T(i) \times EF(i))$, where $EC(y)$ = the amount of offset credit available for the year, $CO(y-1)$ = the amount of offset carryover available from the previous year, i = the i th load of biomass received for the offset year, $DF(i)$ = the distance factor for the i th load of biomass, $T(i)$ = the number of Tons of biomass in the i th load, and $EF(i)$ = the emission factor for the type of biomass in the i th load. [District NSR Rule] Federally Enforceable Through Title V Permit
32. The offset Distance Factor (DF) shall be 1.2 for biomass originating within a 15 mile radius of this facility and 2.0 for biomass originating outside of the 15 mile radius. [District NSR Rule] Federally Enforceable Through Title V Permit
33. The mass ratio of creditable biomass fuel to total biomass fuel shall not be less than 0.48. Grape stems, grape pomace, almond and walnut shells, construction wood waste, urban wood waste and lawn trimmings are not considered biomass fuels. [District NSR Rule] Federally Enforceable Through Title V Permit
34. The owner operator shall curtail operation proportionately and notify the District whenever, due to changes in the quantity or quality of wastes supplied, the emissions exceed the offsets. [District NSR Rule] Federally Enforceable Through Title V Permit
35. All fuels shall be burned on a first-in, first-out basis. Compliance with this condition shall be based on mixed fuel piles (first-mixed, first-burned). [District NSR Rule] Federally Enforceable Through Title V Permit
36. Performance testing shall be conducted annually for NO_x, CO, SO_x, PM and PM(10) at the maximum operating capacity using following test methods; for NO_x EPA Method 7E or ARB Method 100; for CO EPA Method 10 or ARB Method 100; for SO_x EPA Method 6 or 6C ; for PM EPA Method 5 (including back half); and for PM(10) EPA Method 5 (including back half assuming 100% of PM is PM10) or EPA Method 201A in combination with EPA Method 202 or any others test methods and procedures approved by the District. [District Rule 4301, 4352 & 1081] Federally Enforceable Through Title V Permit
37. The higher heating value of all solids fuels shall be certified by a third-party supplier or determined by ASTM Method E711 or other test method(s) with prior written approval of the APCO, ARB, and EPA. [District Rule 4352, 6.4] Federally Enforceable Through Title V Permit
38. All emissions measurements during a source test shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No compliance determination shall be established within two hours after a period in which fuel flow to the unit is zero, or is shut off for 30 minutes or longer. [District Rule 4352, 6.3.2, 6.3.3] Federally Enforceable Through Title V Permit
39. The District must be notified 30 days prior to any performance test, and a test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
40. The results of each performance test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
41. Permittee shall operate a Continuous Emissions Monitoring (CEM) system to monitor and record NO_x concentrations and O₂ concentrations, as well as the NO_x emission rate whenever the unit is operating. The CEM system shall be operated, maintained, and calibrated pursuant to the requirements of 40 CFR 60.7(c), 60.13, and 60.48b. The CEM system must also comply with 40 CFR 60 Appendix B, Performance Specifications 2 and 3, and 40 CFR 60 Appendix F, Quality Assurance Procedures. Per Section 5.1.1 of Appendix F, at least once each calendar year, a Relative Accuracy Test Audit (RATA) must be conducted. Per Sections 5.1.2 and 5.1.3 of Appendix F, a Cylinder Gas Audit (CGA) and a Relative Accuracy Audit (RAA) must be conducted once each calendar quarter, except in the quarter where a RATA is performed. [District Rules 1080 and 4352, 5.5 and 40 CFR 60.7(c), 40 CFR 60.13, and 40 CFR 60.48b] Federally Enforceable Through Title V Permit
42. Compliance with the daily NO_x emission limit shall be based on a block 24-hour averaging period using CEM system data. [District Rule 4352, 5.2 and 40 CFR 60.44b(i)] Federally Enforceable Through Title V Permit
43. The continuous monitoring equipment must be linked to a data acquisition system that is accessible via modem. [District Rules 1080 and 4352, 5.5] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

44. Permittee shall operate a Continuous Opacity Monitoring (COM) system to monitor and record opacity whenever the unit is operating. The COM system shall be operated, maintained, and calibrated pursuant to the requirements of 40 CFR 60.7(c), 60.13, and 60.48b. The COM system must also satisfy Performance Specification 1 of 40 CFR 60 Appendix B. [District Rule 1080 and 40 CFR 60.7(c), 40 CFR 60.13, 40 CFR 60.48b, and 40 CFR 64.3(a) and (d)] Federally Enforceable Through Title V Permit
45. A quarterly CEM and COM report shall be submitted to the District which includes the following: hours of operation, the date and time of each exceedance of emissions limits (including startup, shutdown, malfunctions or any other reason), the quantity of excess emissions, any conversion factors used to calculate excess emissions, the nature and cause of each malfunction, any corrective action taken and any preventive measures adopted, hours of CEM (and COM) down time, and the cause of all CEM (and COM) down time. [District Rules 1080 and 4352, 5.5; 40 CFR 60.49b(h), and 40 CFR 64.3(d)(i)] Federally Enforceable Through Title V Permit
46. Quarterly reports shall be submitted to the District within 30 days after the end of each calendar quarter. [District Rules 1080 and 4352, 5.5] Federally Enforceable Through Title V Permit
47. Results of continuous emissions monitoring must be reduced according to the procedure established in 40 CFR, Part 51, Appendix P, paragraphs 5.0 through 5.3.3, or by other methods deemed equivalent by mutual agreement with the District, the ARB, and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit
48. A violation of NO_x emission standards indicated by the NO_x CEMS shall be reported by the operator to the APCO within 96 hours. [District Rule 1080] Federally Enforceable Through Title V Permit
49. Operator shall notify the APCO no later than eight hours after the detection of a breakdown of the CEMS. Operator shall inform the APCO of the intent to shut down the CEMS at least 24 hours prior to the event. [District Rule 1080] Federally Enforceable Through Title V Permit
50. At the time of each annual source test for PM, the permittee shall establish the acceptable range of primary and secondary current and voltage readings for the electrostatic precipitator. Minimum readings for each parameter shall be established at 15% below the average value measured during the PM source test. Maximum readings for each parameter shall be established at 15% above the average value measured during the PM source test. [40 CFR part 64] Federally Enforceable Through Title V Permit
51. During each day of operation, the permittee shall record electrostatic precipitator voltage and current readings and compare the readings with the acceptable range of current and voltage levels established during the most recent annual PM source test. Upon detecting any excursion from the acceptable range of current or voltage readings, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [40 CFR part 64] Federally Enforceable Through Title V Permit
52. Devices used to measure primary and secondary voltage and current shall be maintained in accordance with the manufacturer's specifications. [40 CFR part 64] Federally Enforceable Through Title V Permit
53. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR part 64] Federally Enforceable Through Title V Permit
54. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR part 64] Federally Enforceable Through Title V Permit
55. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR part 64.8. [40 CFR part 64] Federally Enforceable Through Title V Permit
56. All equipment or systems installed or used to achieve compliance with the terms and conditions of this Title V permit shall be maintained in good working order and be operated as efficiently as possible to minimize air pollution emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
57. The net electrical power output shall not exceed 28.5 MW. [District NSR Rule] Federally Enforceable Through Title V Permit
58. Natural gas, butane, and propane may be used as start-up fuel and combustion stabilization purposes only. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

59. Records of system maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
60. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [District Rule 4801 and Fresno County Rule 406] Federally Enforceable Through Title V Permit
61. The storage and handling of fuels shall be conducted so as to prevent any fire in the facility's fuel storage area. [District Rule 4101]
62. Permittee shall maintain daily records of the amount of "Ashvantage" anti-slag additive used. [District Rule 2201] Federally Enforceable Through Title V Permit
63. Permittee shall record on a monthly basis the higher heating value of all fuels used. [District Rule 4352, 6.2.1] Federally Enforceable Through Title V Permit
64. Records of all daily fuel consumption shall be maintained on site and submitted to the District with quarterly reports and upon request. [District NSR Rule, District Rule 4352, 6.2.1 and 40 CFR 60.49b(d)] Federally Enforceable Through Title V Permit
65. The owner/operator shall maintain records of the type, quantity, and blend of all biomass received and used on a daily basis and of the certifications that the biomass has historically been burned in the San Joaquin Valley air basin. [District NSR Rule and District Rule 4352, 6.2.1] Federally Enforceable Through Title V Permit
66. All records required by this permit shall be retained on site for a minimum of five years, and shall be made available for District inspection upon request. [District NSR Rule, and District Rules 2520, 9.4.2 and 4352, 6.2.2] Federally Enforceable Through Title V Permit

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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1820-2-6

EXPIRATION DATE: 11/30/2009

EQUIPMENT DESCRIPTION:

BIOMASS FUEL RECEIVING AND UNLOADING OPERATION CONSISTING OF TWO 10'X70' TILTING LIFT PLATFORMS WITH TELESCOPING HYDRAULIC CYLINDERS FOR DUMPING INTO A RECEIVING HOPPER OF 5000 CU.FT CAPACITY. RATING: 365 HP.

PERMIT UNIT REQUIREMENTS

1. Fugitive emissions from all fuel transfer points shall be controlled to prevent excessive dust during operation. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Fogging dust controls shall be operated at all times when handling any fuels. [District NSR Rule] Federally Enforceable Through Title V Permit
3. All conveyor covers shall be maintained securely in place and without leakage. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Operator shall maintain windscreen to prevent fugitive dust from storage piles. All screens shall be repaired within 24 hours. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Visible emissions from each transfer point shall be checked quarterly. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
6. Records of system maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1820-3-4

EXPIRATION DATE: 11/30/2009

EQUIPMENT DESCRIPTION:

FUEL HANDLING SYSTEM CONSISTING OF COLLECTING BELT CONVEYOR, STACKER CONVEYOR, STORAGE, OVERPILE AND UNDERPILE RECLAIMERS, RECLAIM TRANSFER(CHAIN & BELT CONVEYOR, SELF CLEANING MAGNET, SCREEN CONVEYOR, SHREDDER, FEED CONVEYOR & BIN). RATING: 295 HP

PERMIT UNIT REQUIREMENTS

1. Fugitive emissions from all fuel transfer points and storage piles shall be controlled to prevent excessive dust during operation. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Visible emission from each transfer point shall be checked quarterly. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If excessive visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
3. Records of system maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: C-1820-4-3

EXPIRATION DATE: 11/30/2009

EQUIPMENT DESCRIPTION:
ONE MULTICLONE MECHANICAL DUST COLLECTOR.

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PERMIT UNIT REQUIREMENTS

1. The particulate matter concentration exiting the multiclone shall not exceed 0.5 grains/dscf at 12% CO₂. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Multiclone collector shall be strictly maintained at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
3. At no time shall the emissions passing through the multiclone be allowed to bypass the electrostatic precipitator. [District NSR Rule] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1820-5-12

EXPIRATION DATE: 11/30/2009

EQUIPMENT DESCRIPTION:

ONE 238 KVA RESEARCH COTTREL ELECTROSTATIC PRECIPITATOR EXHAUSTING TO ONE 147 FEET HIGH BY 8 FEET DIAMETER CARBON STEEL STACK

PERMIT UNIT REQUIREMENTS

1. Particulate matter concentration shall not exceed 0.010 grains/dscf corrected at 12% CO₂. [District NSR Rule and District Rule 4201] Federally Enforceable Through Title V Permit
2. 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] Federally Enforceable Through Title V Permit
3. Electrostatic Precipitator shall be strictly maintained at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The precipitator automatic rapping system is to be operated to maximize collection efficiency including only one rapping position to be energized at any one time to minimize dust re-entrainment. [District NSR Rule] Federally Enforceable Through Title V Permit
5. All fields shall be operated at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Secondary voltage limit settings shall be maintained between 40 and 80 kilovolts at each cell. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Secondary current (amperage) limit settings shall be maintained between 0.05 and 1.40 amps at cell #1, 0.2 and 1.40 amps at cell #2, and 0.4 and 1.40 amps at cell #3. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Records shall be maintained on the quality and accuracy of all instruments used to verify compliance with the terms and conditions of the Permit to Operate and District regulations. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Data from all monitors shall be submitted quarterly to the District. Malfunctions in the monitoring equipment shall be reported to the District. [District Rule 2520, 9.5.2] Federally Enforceable Through Title V Permit
10. Source testing shall be required annually or as often as deemed necessary by the Air Pollution Control District. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Source testing to measure particulate matter including condensibles and particulate matter not including condensibles, shall be conducted using EPA Methods 5 and 8, and in accordance with Rule 1081, section 6.0 (12/16/93). [District Rule 1081; PSD SJ 76-44] Federally Enforceable Through Title V Permit
12. Each cell voltage and current (amperage) shall be checked and recorded on a daily basis. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1820-6-6

EXPIRATION DATE: 11/30/2009

EQUIPMENT DESCRIPTION:

ASH COLLECTION SYSTEM CONSISTING OF ENCLOSED DRY ASH CONVEYORS COLLECTING DRY ASH FROM THE BOILER, AIR HEATER, AND AIR POLLUTION CONTROL SYSTEM; ONE (1) ENCLOSED DRY ASH ELEVATOR; ONE (1) 4,000 FT³ DRY ASH STORAGE SILO SERVED BY A FLEX-KLEEN MODEL 84 BUBS 9LLG BAGHOUSE; ONE (1) WET ASH UNLOADING SYSTEM WITH A WET PUG MILL; ONE (1) DRY ASH UNLOADING SYSTEM WITH A SLY XP DUST-FREE LOADING SPOUT SERVED BY A DISA MODEL RJCA BAGHOUSE

PERMIT UNIT REQUIREMENTS

1. {14} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
2. {271} All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule]
3. Fugitive emissions from all ash transfer points shall be controlled to prevent excessive dust during operation. [District NSR Rule]
4. Visible emissions from baghouses serving the dry ash silo loading and unloading operations shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201]
5. The baghouses serving the dry ash silo loading and unloading operations shall be maintained and operated according to manufacturer's specifications. [District Rule 2201]
6. A spare set of bags for each baghouse serving the dry ash silo loading and unloading operations shall be maintained on the premises at all times. [District Rule 2201]
7. Each baghouse serving the dry ash silo loading and unloading operations shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201]
8. The pressure differential gage reading range shall be established per manufacturer's recommendation at the time of start-up inspection. [District Rule 2201]
9. Dust collector filters shall be inspected quarterly while in operation for evidence of particulate matter breakthrough and replaced as needed. [District Rule 2520, 9.3.2]
10. Dust collector filters shall be inspected quarterly while not in operation for tears, scuffs, abrasions or holes which might interfere with the PM collection efficiency and shall be replaced as needed. [District Rule 2520, 9.3.2]
11. Visible emissions from all ash transfer points shall be checked quarterly. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If excessive visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2]
12. The maximum combined daily quantity of dry ash and wet ash (on a dry basis) unloaded from the dry ash storage silo shall not exceed 200 ton-dry ash/day. [District Rule 2201]
13. For the wet ash unloading process, compliance with the dry ash maximum daily unloading throughput limit shall be demonstrated utilizing the following calculation: [equivalent quantity of dry ash unloaded from the storage silo (ton-dry ash /day)] = [quantity of wet ash unloaded from the silo (lb-wet ash unloaded/day)] x [1 - wet ash moisture content (lb-water / lb-wet ash)]. [District Rule 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

14. Moisture content of wet ash unloaded from the dry ash storage silo shall be maintained above 10% or greater, by weight. [District Rule 2201]
15. The percent moisture of wet ash unloaded from the dry ash storage silo shall be determined by weighing an approximately 2-lb sample of wet ash, bringing the sample to dryness in a drying oven, then weighing the dried sample; the weight difference is the moisture content. [District Rule 2201]
16. Moisture content of wet ash unloaded from the dry ash storage silo shall be measured on a monthly basis and when requested by the District. [District Rule 2201]
17. PM10 emissions from the baghouse serving the dry ash storage silo loading system shall not exceed 0.0072 lb/ton of dry ash loaded in the silo. [District Rule 2201]
18. PM10 emissions from the baghouse serving the dry ash unloading system shall not exceed 0.02 lb/ton of dry ash loaded in truck. [District Rule 2201]
19. PM10 emissions during the truck closing process, after truck is loaded with dry ash, shall not exceed 0.037 lb/ton of dry ash loaded in truck. [District Rule 2201]
20. Daily records of the total quantity of dry ash, wet ash, and total dry ash calculated as the sum of dry ash and wet ash (on a dry ash basis), unloaded from the dry ash storage silo shall be maintained, retained on-site for a period of at least five (5) years and made available for District inspection upon request. [District Rule 1070]
21. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2]
22. Record of monthly moisture content of the wet ash unloaded from the dry ash storage silo shall be maintained, retained on-site for a period of at least five (5) years and made available for District inspection upon request. [District Rule 1070]

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

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San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: C-1820-8-3

EXPIRATION DATE: 11/30/2009

EQUIPMENT DESCRIPTION:
COOLING TOWER FOR ELECTRIC POWER PRODUCTION

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PERMIT UNIT REQUIREMENTS

1. {2256} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.1] Federally Enforceable Through Title V Permit
2. No hexavalent chromium containing compounds shall be added to the water that is circulating through the cooling tower or will circulate through the cooling tower. [District Rule 7012] Federally Enforceable Through Title V Permit
3. The operator shall maintain records of all circulating water tests performed. Records shall be maintained for at least 5 years and shall be made available to the District upon request. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1820-11-1

EXPIRATION DATE: 11/30/2009

EQUIPMENT DESCRIPTION:

SAND AND LIMESTONE RECEIVING AND STORAGE OPERATION INCLUDING ONE PNEUMATICALLY-FILLED 120-TON STORAGE SILO WITH FABRIC DUST COLLECTOR

PERMIT UNIT REQUIREMENTS

1. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Visible emissions shall not exceed 1/4 Ringelmann or equivalent 5% opacity. [District Rule 4101]
3. Sand and limestone shall not be transferred into silo unless fabric filter baghouse is operating and functioning properly. [District Rule 1070]
4. Collected fines shall be returned to sand and limestone system. [District Rule 1070]
5. Sand and limestone receiving shall not exceed 48 hr/month. [District Rule 1070]
6. Silo fabric filter baghouse particulate matter (PM-10) emission rate shall not exceed 0.141 lb/hr and 0.02 gr/scf. [District Rule 4201, 4202]
7. Fabric filter baghouse shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 1070]
8. Fabric filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 1070]
9. The records of hours of operation of sand and limestone receiving system shall be maintained on a monthly basis. [District Rule 1070]
10. Records of fabric filter baghouse maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 1070]
11. {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 Rule 1070]

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

ATTACHMENT B

Previous Title V Operating Permit

San Joaquin Valley Air Pollution Control District

FACILITY: C-1820-0-2

EXPIRATION DATE: 11/30/2009

FACILITY-WIDE REQUIREMENTS

1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (3/21/02). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.12.1] Federally Enforceable Through Title V Permit
6. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
9. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name: RIO BRAVO FRESNO
Location: 3350 S WILLOW AVE, FRESNO, CA 93725
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10. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
13. It shall not be a defense for a 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 the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit
22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (11/15/01). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

23. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in the Table of Standards of District Rule 4601 (10/31/01) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. All VOC-containing materials for architectural coatings subject to Rule 4601 (10/31/01) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (10/31/01). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR 82, Subpart B. [40 CFR 82, Subpart B] Federally Enforceable Through Title V Permit
29. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8021 and 8011] Federally Enforceable Through Title V Permit
30. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8031 and 8011] Federally Enforceable Through Title V Permit
31. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8041 and 8011] Federally Enforceable Through Title V Permit
32. Whenever open areas are disturbed or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8051 and 8011] Federally Enforceable Through Title V Permit
33. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8061 and Rule 8011] Federally Enforceable Through Title V Permit
34. Any unpaved vehicle/equipment area that anticipates more than 75 vehicle trips per day shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 100 vehicle trips per day shall comply with the requirements of Section 5.1.2 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8071 and Rule 8011] Federally Enforceable Through Title V Permit
35. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), and Rule 111 (Kern, Tulare, Kings). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (11/15/01); 4601, sections 5.1, 5.2, 5.3, 5.8 and 8.0 (10/31/01); 8021 (11/15/01); 8031 (11/15/01); 8041 (11/15/01); 8051 (11/15/01); 8061 (11/15/01); and 8071 (11/15/01). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin January 1, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520, 9.5.2] Federally Enforceable Through Title V Permit
42. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
43. When applicable to 40 CFR Part 68, a subject facility shall submit to the proper authority a Risk Management Plan, and comply with all the requirements of Program 1, 2 or 3 when mandated by the regulation. [40 CFR 68] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1820-1-23

EXPIRATION DATE: 11/30/2009

EQUIPMENT DESCRIPTION:

352 MMBTU/HR CIRCULATING FLUIDIZED-BED BIOMASS COMBUSTOR USED TO PRODUCE STEAM FOR ELECTRICAL POWER GENERATION (28.5 MW), WITH ONE COOLING TOWER, ONE AIR PREHEATER, ONE BARETUBE ECONOMIZER, AND TWO 900 AND ONE 700 HP FANS

PERMIT UNIT REQUIREMENTS

1. No more than 500 lb/day of "Ashvantage" anti-slag additive shall be used in this combustor. [District Rule 2201] Federally Enforceable Through Title V Permit
2. In the event that the use of "Ashvantage" anti-slag additive causes a violation of any applicable requirement of this permit, the operator shall immediately cease usage of the anti-slag additive. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Permittee shall maintain daily records of the amount of "Ashvantage" anti-slag additive used. These records shall be kept and maintained for at least five years, and made readily available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The fuel consumption in the fluidized bed combustor shall not exceed 36 tons at 30% moisture in any one hour. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Records of all daily fuel consumption shall be maintained on site and submitted to the District with quarterly reports and upon request. [District NSR Rule, District Rule 4352 and 40 CFR 60.49b(d)] Federally Enforceable Through Title V Permit
6. A Continuous Emissions Monitoring System shall be in place and operating whenever the facility is operating. NOx (as NO2 corrected to 3% O2), opacity and CO concentrations must be recorded continuously. [District Rule 4352 and 40 CFR 60.48b(b) & (a)] Federally Enforceable Through Title V Permit
7. The continuous monitoring equipment must be linked to a data logger which is compatible with the District's data acquisition system. [District Rule 1080] Federally Enforceable Through Title V Permit
8. Ammonia shall be injected into the fluidized bed combustor as necessary to meet the limits in these conditions and whenever the combustor is in full operation. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Daily summaries of continuous monitoring records for each calendar quarter shall be submitted to the District within 30 days of the end of the calendar quarter. [District Rule 1080 and 40 CFR 60.49b(f)] Federally Enforceable Through Title V Permit
10. A report shall be submitted within 30 days of the end of each calendar quarter identifying the time and date of each exceedance of emissions limits, the excess emissions generated and any conversion factors used to calculate excess emissions. [District Rule 1080] Federally Enforceable Through Title V Permit
11. The quarterly report shall identify each period of excess emissions that occurs during startups, shutdowns, or malfunctions. The nature and cause of each malfunction, corrective action taken, and preventive measures adopted shall also be reported. [District Rule 1080 and 40 CFR 60.49b(h)] Federally Enforceable Through Title V Permit
12. Operation and calibration of the continuous monitoring system shall be in accordance with the requirements of 40 CFR part 60.13. [40 CFR 60.13 and District Rule 1080, 4.0] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: RIO BRAVO FRESNO

Location: 3350 S WILLOW AVE, FRESNO, CA 93725

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13. Filterable PM10 emissions from the exhaust of the electrostatic precipitator shall not exceed 5.8 lb/hr, and condensable PM10 emissions shall not exceed 17.4 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Combustion contaminants shall not exceed 10 lb/hr. Combustion contaminants are defined as particulate matter discharged into the atmosphere from the burning of any kind of material containing carbon in a free or combined state. Lab analysis testing shall be performed during each source test to determine the total amount of non-combustion contaminants, which shall be subtracted from the total particulate measured during the annual PM performance test to determine the total combustion contaminants. [District Rule 4301] Federally Enforceable Through Title V Permit
15. The SOx emissions (calculated as SO2) from the exhaust of the fluidized bed combustor shall not exceed 10.0 lb/hour nor 240 lb/day. [District NSR Rule, District Rule 4301] Federally Enforceable Through Title V Permit
16. Except during startup periods, the NOx emissions (measured as NO2) from the exhaust of the fluidized bed combustor shall not exceed 0.08 lb/MMBTU, 660 lb/day, nor 110 tons per year. [District NSR Rule, District Rules 4352 and 4301] Federally Enforceable Through Title V Permit
17. Except during startup periods, the carbon monoxide emissions from the fluidized bed combustor shall not exceed 22 lb/hour, 528 lb/day, nor 46 tons/year. [District NSR Rule and District Rule 4352] Federally Enforceable Through Title V Permit
18. During the startup periods, the NOx emissions (measured as NO2) from the exhaust of the fluidized bed combustor shall not exceed 0.16 lb/MMBTU, 660 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
19. During startup periods, the carbon monoxide emissions from the fluidized bed combustor shall not exceed 44 lb/hour, 528 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
20. Combustor start-up is defined as any period, not exceeding 96 hours, during which the combustor is set in operation and heated from a lower temperature to a steady state operating temperature. [District Rule 4652, 3.1.3] Federally Enforceable Through Title V Permit
21. The VOC emissions from the exhaust of the fluidized bed combustor shall not exceed 10.4 lb/hour nor 250 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
22. The concentration of filterable PM10 in the exhaust from the electrostatic precipitator shall not exceed 0.010 gr/dscf corrected to 12% CO2. [District NSR Rule and District Rule 4201] Federally Enforceable Through Title V Permit
23. The concentration of ammonia in the exhaust of the fluidized bed combustor shall not exceed 25 ppmv at 3% O2. [District NSR Rule] Federally Enforceable Through Title V Permit
24. The electrostatic precipitator shall be operated in a manner so as to minimize the emissions of particulate matter whenever the fluidized bed combustor is fired. [District NSR Rule] Federally Enforceable Through Title V Permit
25. Only alfalfa, barley, beanstraw, corn, orchard prunings, vineyard prunings, oats, wheat, and forest residues shall be used as offset creditable fuels. [District NSR Rule] Federally Enforceable Through Title V Permit
26. Only grape stems, grape pumice, almond shells, walnut shells, construction wood waste, urban wood waste, and up to 1,500 pounds per quarter of confiscated drugs shall be used as non-creditable fuels. [District NSR Rule] Federally Enforceable Through Title V Permit
27. Fuels shall not be painted, oiled or stained. [District NSR Rule] Federally Enforceable Through Title V Permit
28. The NOx emission factor used to calculate emission offset credits for orchard and vineyard wastes shall be 4.3 lb NOx per ton, for forest residue shall be 4.0 lb NOx per ton and for all other permitted agricultural wastes shall be 4.26 lb NOx per ton. [District NSR Rule] Federally Enforceable Through Title V Permit
29. Open-burn emission factors used to determine the quantity of offsets available from the diversion of biomass (as defined in District Rule 2201, Section 3.10, 4/25/02 version) from open-burning are listed in District Policy SSP 2005 "Open Burn Emission Factors" . [District NSR Rule] Federally Enforceable Through Title V Permit
30. The owner/operator shall maintain records of the type, quantity, and blend of all biomass received and used on a daily basis and of the certifications that the biomass has historically been burned in the San Joaquin Valley air basin. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

31. The owner/operator shall verify all emissions and related data and make the verifications available upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
32. The owner/operator shall provide certification for all fuel which is assigned offset credit. [District NSR Rule] Federally Enforceable Through Title V Permit
33. The owner/operator shall submit written contracts between the owner/operator and all fuel suppliers annually to the District for approval. [District NSR Rule] Federally Enforceable Through Title V Permit
34. Agreements between each fuel supplier and the owner/operator shall be considered as part of the permit to operate after District approval. [District NSR Rule] Federally Enforceable Through Title V Permit
35. The owner/operator shall be responsible for ensuring that emission credits are properly evaluated according to the provisions of the agreements with fuel suppliers. [District NSR Rule] Federally Enforceable Through Title V Permit
36. The owner/operator shall project and use the proper mix of fuels to ensure that all emissions are offset as required with credits from the use of creditable fuels. [District NSR Rule] Federally Enforceable Through Title V Permit
37. The emission credits for the use of creditable fuels shall be calculated using the protocol approved in the District's December 9, 1999 correspondence to the facility. [District NSR Rule] Federally Enforceable Through Title V Permit
38. Emission offset credit will be calculated using the formula $EC(y) = CO(y-1) + \text{Summation } (1/DF(i) \times T(i) \times EF(i))$, where $EC(y)$ = the amount of offset credit available for the year, $CO(y-1)$ = the amount of offset carryover available from the previous year, i = the i th load of biomass received for the offset year, $DF(i)$ = the distance factor for the i th load of biomass, $T(i)$ = the number of Tons of biomass in the i th load, and $EF(i)$ = the emission factor for the type of biomass in the i th load. [District NSR Rule] Federally Enforceable Through Title V Permit
39. The offset Distance Factor (DF) shall be 1.2 for biomass originating within a 15 mile radius of this facility and 2.0 for biomass originating outside of the 15 mile radius. [District NSR Rule] Federally Enforceable Through Title V Permit
40. The mass ratio of creditable biomass fuel to total biomass fuel shall not be less than 0.48. Grape stems, grape pomace, almond and walnut shells, construction wood waste, urban wood waste and lawn trimmings are not considered biomass fuels. [District NSR Rule] Federally Enforceable Through Title V Permit
41. The owner operator shall curtail operation proportionately and notify the District whenever, due to changes in the quantity or quality of wastes supplied, the emissions exceed the offsets. [District NSR Rule] Federally Enforceable Through Title V Permit
42. All fuels shall be burned on a first-in, first-out basis. Compliance with this condition shall be based on mixed fuel piles (first-mixed, first-burned). [District NSR Rule] Federally Enforceable Through Title V Permit
43. Performance testing shall be conducted annually for NO_x, CO, SO_x, PM and PM(10) at the maximum operating capacity using following test methods; for NO_x EPA Method 7E or ARB Method 1-100; for CO EPA Method 10 or ARB Method 100; for SO_x EPA Method 6 or 6C ; for PM EPA Method 5 (including back half); and for PM(10) EPA Method 5 (including back half assuming 100% of PM is PM10) or EPA Method 201A in combination with EPA Method 202 or any others test methods and procedures approved by the District. [District Rule 4301, 4352 & 1081] Federally Enforceable Through Title V Permit
44. The District must be notified 30 days prior to any performance test, and a test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
45. The results of each performance test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
46. All equipment or systems installed or used to achieve compliance with the terms and conditions of this Title V permit shall be maintained in good working order and be operated as efficiently as possible to minimize air pollution emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
47. The net electrical power output shall not exceed 28.5 MW. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

48. Natural gas, butane, and propane may be used as start-up fuel and combustion stabilization purposes only. [District NSR Rule] Federally Enforceable Through Title V Permit
49. Records of system maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
50. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [District Rule 4801 and Fresno County Rule 406] Federally Enforceable Through Title V Permit
51. Results of continuous emissions monitoring must be reduced according to the procedure established in 40 CFR, Part 51, Appendix P, paragraphs 5.0 through 5.3.3, or by other methods deemed equivalent by mutual agreement with the District, the ARB, and the EPA. [District Rule 1080; Fresno County Rule 108] Federally Enforceable Through Title V Permit
52. A violation of NOx emission standards indicated by the NOx CEMS shall be reported by the operator to the APCO within 96 hours. [District Rule 1080; Fresno County Rule 108] Federally Enforceable Through Title V Permit
53. Operator shall notify the APCO no later than eight hours after the detection of a breakdown of the CEMS. Operator shall inform the APCO of the intent to shut down the CEMS at least 24 hours prior to the event. [District Rule 1080; Fresno County Rule 108] Federally Enforceable Through Title V Permit
54. Carbon monoxide emissions from the exhaust of the fluidized bed combustor shall not exceed 400 ppmv at 3% O₂, or 310 ppmv at 7% O₂, or 310 ppmv at 12% CO₂. [District Rule 4352, 5.3] Federally Enforceable Through Title V Permit
55. The storage and handling of fuels shall be conducted so as to prevent any fire in the facility's fuel storage area. [District Rule 4101]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1820-2-5

EXPIRATION DATE: 11/30/2009

EQUIPMENT DESCRIPTION:

BIOMASS FUEL RECEIVING AND UNLOADING OPERATION CONSISTING OF TWO 10'X70' TILTING LIFT PLATFORMS WITH TELESCOPING HYDRAULIC CYLINDERS FOR DUMPING INTO A RECEIVING HOPPER OF 5000 CU.FT CAPACITY. RATING: 365 HP.

PERMIT UNIT REQUIREMENTS

1. Fugitive emissions from all fuel transfer points shall be controlled to prevent excessive dust during operation. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Fogging dust controls shall be operated at all times when handling any fuels. [District NSR Rule] Federally Enforceable Through Title V Permit
3. All conveyor covers shall be maintained securely in place and without leakage. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Operator shall maintain windscreen to prevent fugitive dust from storage piles. All screens shall be repaired within 24 hours. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Visible emissions from each transfer point shall be checked quarterly. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
6. Records of system maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1820-3-3

EXPIRATION DATE: 11/30/2009

EQUIPMENT DESCRIPTION:

FUEL HANDLING SYSTEM CONSISTING OF COLLECTING BELT CONVEYOR, STACKER CONVEYOR, STORAGE, OVERPILE AND UNDERPILE RECLAIMERS, RECLAIM TRANSFER(CHAIN & BELT CONVEYOR, SELF CLEANING MAGNET, SCREEN CONVEYOR, SHREDDER, FEED CONVEYOR & BIN). RATING: 295 HP

PERMIT UNIT REQUIREMENTS

1. Fugitive emissions from all fuel transfer points and storage piles shall be controlled to prevent excessive dust during operation. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Visible emission from each transfer point shall be checked quarterly. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If excessive visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
3. Records of system maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1820-4-2

EXPIRATION DATE: 11/30/2009

EQUIPMENT DESCRIPTION:
ONE MULTICLONE MECHANICAL DUST COLLECTOR.

PERMIT UNIT REQUIREMENTS

1. The particulate matter concentration exiting the multiclone shall not exceed 0.5 grains/dscf at 12% CO₂. [District NSR Rule] Federally Enforceable Through Title V Permit .
2. Multiclone collector shall be strictly maintained at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
3. At no time shall the emissions passing through the multiclone be allowed to bypass the electrostatic precipitator. [District NSR Rule] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1820-5-11

EXPIRATION DATE: 11/30/2009

EQUIPMENT DESCRIPTION:

ONE 238 KVA RESEARCH COTTREL ELECTROSTATIC PRECIPITATOR EXHAUSTING TO ONE 147 FEET HIGH BY 8 FEET DIAMETER CARBON STEEL STACK

PERMIT UNIT REQUIREMENTS

1. Particulate matter concentration shall not exceed 0.010 grains/dscf corrected at 12% CO₂. [District NSR Rule and District Rule 4201] Federally Enforceable Through Title V Permit
2. 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] Federally Enforceable Through Title V Permit
3. Electrostatic Precipitator shall be strictly maintained at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The precipitator automatic rapping system is to be operated to maximize collection efficiency including only one rapping position to be energized at any one time to minimize dust re-entrainment. [District NSR Rule] Federally Enforceable Through Title V Permit
5. All fields shall be operated at all times. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Secondary voltage limit settings shall be maintained between 40 and 80 kilovolts at each cell. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Secondary current (amperage) limit settings shall be maintained between 0.05 and 1.40 amps at cell #1, 0.2 and 1.40 amps at cell #2, and 0.4 and 1.40 amps at cell #3. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Records shall be maintained on the quality and accuracy of all instruments used to verify compliance with the terms and conditions of the Permit to Operate and District regulations. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Data from all monitors shall be submitted quarterly to the District. Malfunctions in the monitoring equipment shall be reported to the District. [District Rule 2520, 9.5.2] Federally Enforceable Through Title V Permit
10. Source testing shall be required annually or as often as deemed necessary by the Air Pollution Control District. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Source testing to measure particulate matter including condensibles and particulate matter not including condensibles, shall be conducted using EPA Methods 5 and 8, and in accordance with Rule 1081, section 6.0 (12/16/93). [District Rule 1081; PSD SJ 76-44] Federally Enforceable Through Title V Permit
12. Each cell voltage and current (amperage) shall be checked and recorded on a daily basis. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1820-6-2

EXPIRATION DATE: 11/30/2009

EQUIPMENT DESCRIPTION:

ASH COLLECTION SYSTEM CONSISTING OF ENCLOSED DRY ASH CONVEYORS COLLECTING DRY ASH FROM THE BOILER, AIR HEATER, AND AIR POLLUTION CONTROL SYSTEM; ONE (1) ENCLOSED DRY ASH ELEVATOR; ONE (1) 4,000 FT³ DRY ASH STORAGE SILO SERVED BY A FLEX-KLEEN MODEL 84 BUBS 9LLG BAGHOUSE; ONE (1) WET ASH UNLOADING SYSTEM WITH A WET PUG MILL; ONE (1) DRY ASH UNLOADING SYSTEM WITH A SLY XP DUST-FREE LOADING SPOUT SERVED BY A DISA MODEL RJCA BAGHOUSE

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule]
3. Fugitive emissions from all ash transfer points shall be controlled to prevent excessive dust during operation. [District NSR Rule]
4. Visible emissions from baghouses serving the dry ash silo loading and unloading operations shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201]
5. The baghouses serving the dry ash silo loading and unloading operations shall be maintained and operated according to manufacturer's specifications. [District Rule 2201]
6. A spare set of bags for each baghouse serving the dry ash silo loading and unloading operations shall be maintained on the premises at all times. [District Rule 2201]
7. Each baghouse serving the dry ash silo loading and unloading operations shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201]
8. The pressure differential gage reading range shall be established per manufacturer's recommendation at the time of start-up inspection. [District Rule 2201]
9. Dust collector filters shall be inspected quarterly while in operation for evidence of particulate matter breakthrough and replaced as needed. [District Rule 2520, 9.4.2]
10. Dust collector filters shall be inspected quarterly while not in operation for tears, scuffs, abrasions or holes which might interfere with the PM collection efficiency and shall be replaced as needed. [District Rule 2520, 9.4.2]
11. Visible emissions from all ash transfer points shall be checked quarterly. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If excessive visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.4.2]
12. The maximum combined daily quantity of dry ash and wet ash (on a dry basis) unloaded from the dry ash storage silo shall not exceed 200 ton-dry ash/day. [District Rule 2201]
13. For the wet ash unloading process, compliance with the dry ash maximum daily unloading throughput limit shall be demonstrated utilizing the following calculation: [equivalent quantity of dry ash unloaded from the storage silo (ton-dry ash /day)] = [quantity of wet ash unloaded from the silo (lb-wet ash unloaded/day)] x [1 - wet ash moisture content (lb-water / lb-wet ash)]. [District Rule 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

14. Moisture content of wet ash unloaded from the dry ash storage silo shall be maintained above 10% or greater, by weight. [District Rule 2201]
15. The percent moisture of wet ash unloaded from the dry ash storage silo shall be determined by weighing an approximately 2-lb sample of wet ash, bringing the sample to dryness in a drying oven, then weighing the dried sample; the weight difference is the moisture content. [District Rule 2201]
16. Moisture content of wet ash unloaded from the dry ash storage silo shall be measured on a monthly basis and when requested by the District. [District Rule 2201]
17. PM10 emissions from the baghouse serving the dry ash storage silo loading system shall not exceed 0.0072 lb/ton of dry ash loaded in the silo. [District Rule 2201]
18. PM10 emissions from the baghouse serving the dry ash unloading system shall not exceed 0.02 lb/ton of dry ash loaded in truck. [District Rule 2201]
19. PM10 emissions during the truck closing process, after truck is loaded with dry ash, shall not exceed 0.037 lb/ton of dry ash loaded in truck. [District Rule 2201]
20. Daily records of the total quantity of dry ash, wet ash, and total dry ash calculated as the sum of dry ash and wet ash (on a dry ash basis), unloaded from the dry ash storage silo shall be maintained, retained on-site for a period of at least five (5) years and made available for District inspection upon request. [District Rule 1070]
21. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2]
22. Record of monthly moisture content of the wet ash unloaded from the dry ash storage silo shall be maintained, retained on-site for a period of at least five (5) years and made available for District inspection upon request. [District Rule 1070]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1820-8-2

EXPIRATION DATE: 11/30/2009

EQUIPMENT DESCRIPTION:

COOLING TOWER FOR ELECTRIC POWER PRODUCTION

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.1] Federally Enforceable Through Title V Permit
2. No hexavalent chromium containing compounds shall be added to the water that is circulating through the cooling tower or will circulate through the cooling tower. [District Rule 7012] Federally Enforceable Through Title V Permit
3. The operator shall maintain records of all circulating water tests performed. Records shall be maintained for at least 5 years and shall be made available to the District upon request. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-1820-11-0

EXPIRATION DATE: 11/30/2009

EQUIPMENT DESCRIPTION:

SAND AND LIMESTONE RECEIVING AND STORAGE OPERATION INCLUDING ONE PNEUMATICALLY-FILLED 120-TON STORAGE SILO WITH FABRIC DUST COLLECTOR

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Visible emissions shall not exceed 1/4 Ringelmann or equivalent 5% opacity. [District Rule 4101]
3. Sand and limestone shall not be transferred into silo unless fabric filter baghouse is operating and functioning properly. [District Rule 1070]
4. Collected fines shall be returned to sand and limestone system. [District Rule 1070]
5. Sand and limestone receiving shall not exceed 48 hr/month. [District Rule 1070]
6. Silo fabric filter baghouse particulate matter (PM-10) emission rate shall not exceed 0.141 lb/hr and 0.02 gr/scf. [District Rule 4201, 4202]
7. Fabric filter baghouse shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 1070]
8. Fabric filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 1070]
9. The records of hours of operation of sand and limestone receiving system shall be maintained on a monthly basis. [District Rule 1070]
10. Records of fabric filter baghouse maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 1070]
11. 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]

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

ATTACHMENT C

Detailed Facility List

Detailed Facility Report
For Facility=1820 and excluding Deleted Permits
Sorted by Facility Name and Permit Number

RIO BRAVO FRESNO 3350 S WILLOW AVE FRESNO, CA 93725	FAC # STATUS: TELEPHONE:	C 1820 A (559) 264-4575	TYPE: TitleV TOXIC ID: 40233	EXPIRE ON: 11/30/2009 AREA: 7 / INSP. DATE: 11/10
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PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
C-1820-1-23	28,500 kW	3020-08A F	1	8,171.00	8,171.00	A	352 MMBTU/HR CIRCULATING FLUIDIZED-BED BIOMASS COMBUSTOR USED TO PRODUCE STEAM FOR ELECTRICAL POWER GENERATION (28.5 MW), WITH ONE COOLING TOWER, ONE AIR PREHEATER, ONE BARETUBE ECONOMIZER, AND TWO 900 AND ONE 700 HP FANS
C-1820-2-5	electrical generator component	999-99	1	0.00	0.00	A	BIOMASS FUEL RECEIVING AND UNLOADING OPERATION CONSISTING OF TWO 10'X70' TILTING LIFT PLATFORMS WITH TELESCOPING HYDRAULIC CYLINDERSFOR DUMPING INTO A RECEIVING HOPPER OF 5000 CU.FT CAPACITY. RATING: 365 HP.
C-1820-3-3	electrical generator component	999-99	1	0.00	0.00	A	FUEL HANDLING SYSTEM CONSISTING OF COLLECTING BELT CONVEYOR, STACKER CONVEYOR, STORAGE, OVERPILE AND UNDERPILE RECLAIMERS, RECLAIM TRANSFER(CHAIN & BELT CONVEYOR, SELF CLEANING MAGNET, SCREEN CONVEYOR, SHREDDER, FEED CONVEYOR & BIN). RATING: 295 HP
C-1820-4-2	electrical generator component	999-99	1	0.00	0.00	A	ONE MULTICLONE MECHANICAL DUST COLLECTOR.
C-1820-5-11	electrical generator component	999-99	1	0.00	0.00	A	ONE 238 KVA RESEARCH COTTREL ELECTROSTATIC PRECIPITATOR EXHAUSTING TO ONE 147 FEET HIGH BY 8 FEET DIAMETER CARBON STEEL STACK
C-1820-6-2	electrical generation component	999-99	1	0.00	0.00	A	ASH COLLECTION SYSTEM CONSISTING OF ENCLOSED DRY ASH CONVEYORS COLLECTING DRY ASH FROM THE BOILER, AIR HEATER, AND AIR POLLUTION CONTROL SYSTEM; ONE (1) ENCLOSED DRY ASH ELEVATOR; ONE (1) 4,000 FT3 DRY ASH STORAGE SILO SERVED BY A FLEX-KLEEN MODEL 84 BUBS 9LLG BAGHOUSE; ONE (1) WET ASH UNLOADING SYSTEM WITH A WET PUG MILL; ONE (1) DRY ASH UNLOADING SYSTEM WITH A SLY XP DUST-FREE LOADING SPOUT SERVED BY A DISA MODEL RJCA BAGHOUSE
C-1820-8-2	electrical generator component	999-99	1	0.00	0.00	A	COOLING TOWER FOR ELECTRIC POWER PRODUCTION
C-1820-11-0	Electrical Generation Component	999-99	1	0.00	0.00	A	SAND AND LIMESTONE RECEIVING AND STORAGE OPERATION INCLUDING ONE PNEUMATICALLY-FILLED 120-TON STORAGE SILO WITH FABRIC DUST COLLECTOR

Number of Facilities Reported: 1

ATTACHMENT D

CURRENT DISTRICT RULE 4601 SIP COMPARISON

Stringency Comparison of District Rule 4601 Non-SIP Version (12/17/09) to Current SIP Version (10/31/01)

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
2.0 Applicability	This rule is applicable to any person who supplies, sells, offers for sale, applies, or solicits the application of any architectural coating, or who manufactures any architectural coating for use within the District.	This rule is applicable to any person who supplies, sells, offers for sale, applies, or solicits the application of any architectural coating, or who manufactures, blends or repackages any architectural coating for use within the District.	No change in the applicability, therefore, non-SIP version of rule is as stringent as SIP version.
4.0 Exemptions	<p>The provisions of this rule shall not apply to:</p> <p>4.1 Any architectural coating that is sold or manufactured for use outside of the District or for shipment to other manufacturers for reformulation or repackaging.</p> <p>4.2 Any architectural coating that is sold in a containers with a volume of one liter (1.057 quarts) or less.</p> <p>4.3 Any aerosol coating product.</p>	<p>4.1 The provisions of this rule shall not apply to:</p> <p>4.1.1 Any architectural coating that is supplied, sold, offered for sale, or manufactured for use outside of the District or for shipment to other manufacturers for reformulation or repackaging.</p> <p>4.1.2 Any aerosol coating product.</p> <p>4.2 With the exception of Section 6.2, the provisions of this rule shall not apply to any architectural coating that is sold in a container with a volume of one liter (1.057 quarts) or less.</p>	The only change is to require reporting requirements as discussed in Section 6.2 of the non-SIP approved version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.
5.0 Requirements	Note: Section 5.0 requirements refer to Table of Standards, Table of Standards 1, and Table of Standards 2. These tables are included as Attachment X.		
	<p>5.1 VOC Content Limits: Except as provided in Sections 5.2, 5.3, 5.8 and 8.0, no person shall;</p> <p>5.1.1 manufacture, blend, or repackage for sale within the District;</p> <p>5.1.2 supply, sell, or offer for sale within the district;</p> <p>5.1.3 solicit for application or apply within the District any architectural coating with a VOC content in excess of the corresponding limit specified in the Table of Standards, after the specified effective date in the Table of Standards.</p>	<p>5.1 VOC Content Limits: Except as provided in Sections 5.2 and 5.3, no person shall: manufacture, blend, or repackage for use within the District; or supply, sell, or offer for sale within the District; or solicit for application or apply within the District any architectural coating with a VOC content in excess of the corresponding limit specified in the Table of Standards 1 or the Table of Standards 2, after the specified effective date in the Table of Standards 1 or the Table of Standards 2. Limits are expressed as VOC Regulatory, thinned to the manufacturer's maximum thinning recommendation, excluding any colorant added to tint bases.</p>	Sections 5.8 and 8.0 of the SIP version are not included in the non-SIP version. As discussed in corresponding sections the non-SIP version is more stringent. The Table of Standards and Table of Standards 1 have the same VOC limits. Table of Standard 2 is more stringent as discussed below. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.
	<p>5.2 Most Restrictive VOC Limit: If anywhere on the container of any architectural coating, or any label or sticker affixed to the container, or in any sales, advertising, or technical literature supplied by a manufacturer or anyone acting on their behalf, any representation is made that indicates that the coating meets the definition of or is recommended for use for more than one of the coating categories listed in the Table of Standards, then the most restrictive VOC content limit shall apply. This provision does not apply to the following coating categories:</p> <p>5.2.1 Lacquer coatings (including lacquer sanding sealers)</p> <p>5.2.2 Metallic pigmented coatings</p> <p>5.2.3 Shellacs</p> <p>5.2.4 Fire-retardant coatings</p> <p>5.2.5 Pretreatment wash primers</p> <p>5.2.6 Industrial maintenance coatings</p> <p>5.2.7 Low-solids coatings</p>	<p>5.2 Most Restrictive VOC Limit: If a coating meets the definition in Section 3.0 for one or more specialty coating categories listed in the Table of Standards 1 or the Table of Standards 2, then that coating is not required to meet the VOC limits for Flat, Nonflat, or Nonflat – High Gloss coatings, but is required to meet the VOC limit for the applicable specialty coating listed in the Table of Standards 1 or the Table of Standards 2.</p> <p>5.2.1 Effective until December 31, 2010, with the exception of the specialty coating categories specified in Section 5.2.3.1 through 5.2.3.15, if a coating is recommended for use in more than one of the specialty coating categories listed in the Table of Standards 1, the most restrictive (or lowest) VOC content limit shall apply.</p> <p>5.2.2 Effective on and after January 1, 2011, with the exception of the</p>	The VOC limit of the non-SIP version is at least as stringent as the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>5.2.8 Wood preservatives 5.2.9 High temperature coatings 5.2.10 Temperature-indicator safety coatings 5.2.11 Antenna coatings 5.2.12 Antifouling coatings 5.2.13 Flow coatings 5.2.14 Bituminous roof primers 5.2.15 Specialty primers, sealers and undercoaters</p>	<p>specialty coating categories specified in Sections 5.2.3.2, 5.2.3.3, 5.2.3.5 through 5.2.3.9, and 5.2.3.14 through 5.2.3.18, if a coating is recommended for use in more than one of the specialty coating categories listed in the Table of Standards 2, the most restrictive (or lowest) VOC content limit shall apply.</p> <p>5.2.3 This requirement applies to: usage recommendations that appear anywhere on the coating container, anywhere on any label or sticker affixed to the container, or in any sales, advertising, or technical literature supplied by a manufacturer or anyone acting on their behalf.</p> <p>5.2.3.1 Lacquer coatings (including lacquer sanding sealers) 5.2.3.2 Metallic pigmented coatings 5.2.3.3 Shellacs 5.2.3.4 Fire-retardant coatings 5.2.3.5 Pretreatment wash primers 5.2.3.6 Industrial maintenance coatings 5.2.3.7 Low-solids coatings 5.2.3.8 Wood preservatives 5.2.3.9 High temperature coatings 5.2.3.10 Temperature-indicator safety coatings 5.2.3.11 Antenna coatings 5.2.3.12 Antifouling coatings 5.2.3.13 Flow coatings 5.2.3.14 Bituminous roof primers 5.2.3.15 Specialty primers, sealers and undercoaters 5.2.3.16 Aluminum roof coatings 5.2.3.17 Zinc-rich primers 5.2.3.18 Wood Coatings</p>	
	<p>5.3 Sell-Through of Coatings: 5.3.1 A coating manufactured prior to the January 1, 2003 or January 1, 2004 effective date specified for that coating in the Table of Standards may be sold, supplied, or offered for sale for up to three years after the specified effective date. In addition, a coating manufactured before the effective date specified for that coating in the Table of Standards may be applied at any time, both before and after the specified effective date, so long as the coating complied with the standards in effect at the time the coating was manufactured. This Section 5.3 does not apply to any coating that does not display the date or date-code required by Section 6.1.1. 5.3.2 A coating included in an approved Averaging Program that does not comply with the specified limit in the</p>	<p>5.3 Sell-Through of Coatings: A coating manufactured prior to the effective date specified for that coating in the Table of Standards 1 or the Table of Standards 2, and that complied with the standards in effect at the time the coating was manufactured, may be sold, supplied, or offered for sale for up to three years after the specified effective date. In addition, a coating manufactured before the effective date specified for that coating in the Table of Standards 1 or the Table of Standards 2 may be applied at any time, both before and after the specified effective date, so long as the coating complied with the standards in effect at the time the coating was manufactured. This Section 5.3 does not apply to any coating that does not display the date or date-code required by Section 6.1.1.</p>	<p>The VOC limit of the non-SIP version is at least as stringent as the SIP version. Section 5.3.2 was removed it is no longer applicable in the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</p>

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>Table of Standards may be sold, supplied, or offered for sale for up to three years after the end of the compliance period specified in the approved Averaging Program. In addition, such a coating may be applied at any time, both during and after the compliance period. This Section 5.3.2 does not apply to any coating that does not display on the container either the statement: "This product is subject to architectural coatings averaging provisions in California" or a substitute symbol specified by the Executive Officer of the California Air Resources Board (ARB). This Section 5.3.2 shall remain in effect until January 1, 2008.</p>		
	<p>5.4 Painting Practices: All architectural coating containers used to apply the contents therein to a surface directly from the container by pouring, siphoning, brushing, rolling, padding, ragging or other means, shall be closed when not in use. These architectural coating containers include, but are not limited to, drums, buckets, cans, pails, trays or other application containers. Containers of any VOC containing materials used for thinning and cleanup shall also be closed when not in use.</p>	<p>5.4 Painting Practices: All architectural coating containers used to apply the contents therein to a surface directly from the container by pouring, siphoning, brushing, rolling, padding, ragging or other means, shall be closed when not in use. These architectural coating containers include, but are not limited to, drums, buckets, cans, pails, trays or other application containers. Containers of any VOC-containing materials used for thinning and cleanup shall also be closed when not in use.</p>	<p>No change in the requirements, therefore, non-SIP version of rule is as stringent as SIP version.</p>
	<p>5.5 Thinning: No person who applies or solicits the application of any architectural coating shall apply a coating that is thinned to exceed the applicable VOC limit specified in the Table of Standards.</p>	<p>5.5 Thinning: No person who applies or solicits the application of any architectural coating shall apply a coating that is thinned to exceed the applicable VOC limit specified in the Table of Standards 1 or the Table of Standards 2.</p>	<p>The VOC limit of the non-SIP version is at least as stringent as the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</p>
	<p>5.6 Rust Preventative Coatings: Effective January 1, 2004, no person shall apply or solicit the application of any rust preventative coating for industrial use, unless such a rust preventative coating complies with the industrial maintenance coating VOC limit specified in the Table of Standards.</p>	<p>5.6 Rust Preventative Coatings: Effective through December 31, 2010, no person shall apply or solicit the application of any rust preventative coating for industrial use, unless such a rust preventative coating complies with the industrial maintenance coating VOC limit specified in the Table of Standards 1.</p>	<p>The VOC limit of the non-SIP version is at least as stringent as the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</p>
	<p>5.7 Coatings Not Listed in the Table of Standards: For any coating that does not meet any of the definitions for the specialty coatings categories listed in the Table of Standards, the VOC content limit shall be determined by classifying the coating as a flat coating or a nonflat coating, based on its gloss, as defined in Sections 3.21, 3.36 and 3.37 and the corresponding flat or nonflat VOC limit shall apply.</p>	<p>5.7 Coatings Not Listed in the Table of Standards 1 or the Table of Standards 2: For any coating that does not meet any of the definitions for the specialty coatings categories listed in the Table of Standards 1 or the Table of Standards 2, the VOC content limit shall be determined by classifying the coating as a Flat, Nonflat, or Nonflat – High Gloss coating, based on its gloss, and the corresponding Flat, Nonflat, or Nonflat – High Gloss VOC limit in the Table of Standards 1 or the Table of Standards 2 shall apply.</p>	<p>The VOC limit of the non-SIP version is at least as stringent as the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</p>
	<p>5.8 Lacquers: Notwithstanding the provisions of Section 3.1, a person or facility may add up to 10 percent by volume of VOC to a lacquer to avoid blushing of the finish during days with relative humidity greater</p>	<p>---</p>	<p>This section has been removed. The operation is required to meet the lacquer VOC limit regardless of</p>

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	than 70 percent and temperature below 65°F, at the time of application, provided that the coating contains acetone and no more than 550 grams of VOC per liter of coating, less water and exempt compounds, prior to the addition of VOC.		temperature and humidity. Therefore, non-SIP version of rule is as stringent as SIP version
	5.9 Averaging Compliance Option: On or after January 1, 2003, in lieu of compliance with the specified limits in The Table of Standards for floor coatings; industrial maintenance coatings; primers, sealers, and undercoaters; quick-dry primers, sealers, and undercoaters; quick-dry enamels; roof coatings; bituminous roof coatings; rust preventative coatings; stains; waterproofing sealers, as well as flats and non-flats (excluding recycled coatings), manufacturers may average designated coatings such that their actual cumulative emissions from the averaged coatings are less than or equal to the cumulative emissions that would have been allowed under those limits over a compliance period not to exceed one year. Such manufacturers must also comply with the averaging provisions contained in Section 8.0, as well as maintain and make available for inspection records for at least three years after the end of the compliance period. This Section 5.9 and Section 8.0 shall cease to be effective on January 1, 2005, after which averaging will no longer be allowed.	---	This section is removed from the non-SIP version, it is no longer applicable. Therefore, non-SIP version of rule is as stringent as SIP version.
	---	5.8 Prior to January 1, 2011, any coating that meets a definition in Section 3.0 for a coating category listed in the Table of Standards 2 and complies with the applicable VOC limit in the Table of Standards 2 and with Sections 5.2 and 6.1 (including those provision of Section 6.1 otherwise effective on January 1, 2011) shall be considered in compliance with this rule.	Table of Standards 2 is more stringent than the VOC limits of Table of Standards in the SIP-Approved version. Therefore, non-SIP version of rule is as stringent as SIP version.
6.0 Administrative Requirements	Table of Standards (See Attachment X for Table)	Table of Standards 1 (Effective through 12/31/10) (See Attachment X for Table)	The non-SIP rule requirements are the same as the Table of Standards in the SIP approved rule, except Table of Standards 1 expires at which time Table of Standards 2 is in effect. As discussed below these standards are more stringent. Therefore, non-SIP version of rule is as stringent as SIP version.
6.0 Administrative Requirements		Table of Standards 2 (Effective on and after 1/1/11) (See Attachment X for Table)	The requirements of Table of Standards 2 are more stringent than the Table of Standards in the SIP rule. Therefore, non-SIP version of rule is as stringent as SIP version.
6.0 Administrative Requirements	6.1 Labeling Requirements: Each manufacturer of any architectural coating subject to this rule shall display the information listed in Sections	6.1 Labeling Requirements: Each manufacturer of any architectural coating subject to this rule shall display the	The non-SIP approved rule contain sections listed in the SIP rule plus

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	<p>6.1.1 through 6.1.9 on the coating container (or label) in which the coating is sold or distributed.</p> <p>6.1.1 Date Code: The date the coating was manufactured, or a date code representing the date, shall be indicated on the label, lid or bottom of the container. If the manufacturer uses a date code for any coating, the manufacturer shall file an explanation of each code with the Executive Officer of the ARB.</p> <p>6.1.2 Thinning Recommendations: A statement of the manufacturer's recommendation regarding thinning of the coating shall be indicated on the label or lid of the container. This requirement does not apply to the thinning of architectural coatings with water. If thinning of the coating prior to use is not necessary, the recommendation must specify that the coating is to be applied without thinning.</p> <p>6.1.3 VOC Content: Each container of any coating subject to this rule shall display either the maximum or actual VOC content of the coating, as supplied, including the maximum thinning as recommended by the manufacturer. VOC content shall be displayed in grams of VOC per liter of coating. VOC content displayed shall be calculated using product formulation data, or shall be determined using the test methods in Section</p> <p>6.3.1. The equations in Sections 3.25 or 3.26, as appropriate, shall be used to calculate VOC content.</p> <p>6.1.4 Industrial Maintenance Coatings: In addition to the information specified in Sections 6.1.1, 6.1.2 and 6.1.3, each manufacturer of any industrial maintenance coating subject to this rule shall display on the label or lid of the container in which the coating is sold or distributed one or more of the following descriptions listed in Section 6.1.4.1 through 6.1.4.3.</p> <p>6.1.4.1 "For industrial use only"</p> <p>6.1.4.2 "For professional use only"</p> <p>6.1.4.3 "Not for residential use" or "Not intended for residential use"</p> <p>6.1.5 Clear Brushing Lacquers: Effective January 1, 2003, the labels of all clear brushing lacquers shall prominently display the statements "For brush application only," and "This product must not be thinned or sprayed."</p> <p>6.1.6 Rust Preventative Coatings: Effective January 1, 2003, the labels of all rust preventative coatings shall prominently display the statement "For Metal Substrates Only"</p> <p>6.1.7 Specialty Primers, Sealers and Undercoaters: Effective January 1, 2003, the labels of all specialty primers, sealers and undercoaters shall prominently</p>	<p>information listed in Sections 6.1.1 through 6.1.14 on the coating container (or label) in which the coating is sold or distributed.</p> <p>6.1.1 Date Code: The date the coating was manufactured, or a date code representing the date, shall be indicated on the label, lid or bottom of the container. If the manufacturer uses a date code for any coating, the manufacturer shall file an explanation of each code with the Executive Officer of the ARB.</p> <p>6.1.2 Thinning Recommendations: A statement of the manufacturer's recommendation regarding thinning of the coating shall be indicated on the label or lid of the container. This requirement does not apply to the thinning of architectural coatings with water. If thinning of the coating prior to use is not necessary, the recommendation must specify that the coating is to be applied without thinning.</p> <p>6.1.3 VOC Content: Each container of any coating subject to this rule shall display one of the following values, in grams of VOC per liter of coating:</p> <p>6.1.3.1 Maximum VOC Content, as determined from all potential product formulations; or</p> <p>6.1.3.2 VOC Content, as determined from actual formulation data; or</p> <p>6.1.3.3 VOC Content, as determined using the test methods in Section 6.3.2.</p> <p>If the manufacturer does not recommend thinning, the container must display the VOC Content, as supplied. If the manufacturer recommends thinning, the container must display the VOC Content, including the maximum amount of thinning solvent recommended by the manufacturer. If the coating is a multicomponent product, the container must display the VOC content as mixed or catalyzed. If the coating contains silanes, siloxanes, or other ingredients that generate ethanol or other VOCs during the curing process, the VOC content must include the VOCs emitted during curing.</p> <p>6.1.4 Faux Finishing Coatings: Effective January 1, 2011, the labels of all clear topcoat Faux Finishing coatings shall prominently display the statement "This product can only be sold or used as part of a Faux Finishing coating system".</p> <p>6.1.5 Industrial Maintenance Coatings: Each manufacturer of any industrial maintenance coating subject to this rule shall display on the label or lid of</p>	<p>additional requirements not found in the SIP version. Therefore, non-SIP version of rule is as stringent as SIP version.</p>

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	<p>display one or more of the descriptions listed in Section</p> <p>6.1.7.1 through 6.1.7.5.</p> <p>6.1.7.1 For blocking stains.</p> <p>6.1.7.2 For fire-damaged substrates.</p> <p>6.1.7.3 For smoke-damaged substrates.</p> <p>6.1.7.4 For water-damaged substrates.</p> <p>6.1.7.5 For excessively chalky substrates.</p> <p>6.1.8 Quick Dry Enamels: Effective January 1, 2003, the labels of all quick dry enamels shall prominently display the words "Quick Dry" and the dry hard time.</p> <p>6.1.9 Non-flat – High Gloss Coatings: Effective January 1, 2003, the labels of all non-flat – high gloss coatings shall prominently display the words "High Gloss".</p>	<p>the container in which the coating is sold or distributed one or more of the following descriptions listed in Section 6.1.5.1 through 6.1.5.3.</p> <p>6.1.5.1 "For industrial use only"</p> <p>6.1.5.2 "For professional use only"</p> <p>6.1.5.3 "Not for residential use" or "Not intended for residential use"</p> <p>6.1.6 Clear Brushing Lacquers: The labels of all clear brushing lacquers shall prominently display the statements "For brush application only," and "This product must not be thinned or sprayed." (Category deleted effective January 1, 2011.)</p> <p>6.1.7 Rust Preventative Coatings: The labels of all rust preventative coatings shall prominently display the statement "For Metal Substrates Only".</p> <p>6.1.8 Specialty Primers, Sealers and Undercoaters: Effective until December 31, 2010, the labels of all specialty primers, sealers and undercoaters shall prominently display one or more of the descriptions listed in Section 6.1.8.1 through 6.1.8.5. Effective on and after January 1, 2011, the labels of all specialty primers, sealers, and undercoaters shall prominently display one or more of the descriptions listed in Sections 6.1.8.1 through 6.1.8.3. On and after January 1, 2011, Sections 6.1.8.4 and 6.1.8.5 will be no longer effective.</p> <p>6.1.8.1 For fire-damaged substrates.</p> <p>6.1.8.2 For smoke-damaged substrates.</p> <p>6.1.8.3 For water-damaged substrates.</p> <p>6.1.8.4 For excessively chalky substrates.</p> <p>6.1.8.5 For blocking stains.</p> <p>6.1.9 Quick Dry Enamels: The labels of all quick dry enamels shall prominently display the words "Quick Dry" and the dry hard time. (Category deleted effective January 1, 2011.)</p> <p>6.1.10 Reactive Penetrating Sealers: Effective January 1, 2011, the labels of all Reactive Penetrating Sealers shall prominently display the statement "Reactive Penetrating Sealer."</p> <p>6.1.11 Stone Consolidants: Effective January 1, 2011, the labels of all Stone Consolidants shall prominently display the statement "Stone Consolidant - For Professional Use Only."</p> <p>6.1.12 Nonflat– High Gloss Coatings: The labels of all Nonflat – high gloss coatings shall prominently display the words "High Gloss."</p>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
		<p>6.1.13 Wood Coatings: Effective January 1, 2011, the labels of all Wood Coatings shall prominently display the statement "For Wood Substrates Only."</p> <p>6.1.14 Zinc Rich Primers: Effective January 1, 2011, the labels of all Zinc Rich Primers shall prominently display one or more of the following descriptions listed in Section 6.1.14.1 through 6.1.14.3.</p> <p>6.1.14.1 "For industrial use only"</p> <p>6.1.14.2 "For professional use only"</p> <p>6.1.14.3 "Not for residential use" or "Not intended for residential use"</p>	
	<p>6.2 Reporting Requirements</p> <p>6.2.1 Clear Brushing Lacquers: Each manufacturer of clear brushing lacquers shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of clear brushing lacquers sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.2 Rust Preventative Coatings: Each manufacturer of rust preventative coatings shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of rust preventative coatings sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.3 Specialty Primers, Sealers and Undercoaters: Each manufacturer of specialty primers, sealers and undercoaters shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of specialty primers, sealers and undercoaters sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.4 Toxic Exempt Compounds: For each architectural coating that contains perchloroethylene or methylene chloride, the manufacturer shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB the following information for products sold in the State during the preceding year:</p> <p>6.2.4.1 the product brand name and a copy of the product label with legible usage instructions;</p>	<p>6.2 Reporting Requirements</p> <p>The reporting requirements specified in Sections 6.2.1 through 6.2.6 shall apply until December 31, 2010.</p> <p>6.2.1 Clear Brushing Lacquers: Each manufacturer of clear brushing lacquers shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of clear brushing lacquers sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.2 Rust Preventative Coatings: Each manufacturer of rust preventative coatings shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of rust preventative coatings sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.3 Specialty Primers, Sealers and Undercoaters: Each manufacturer of specialty primers, sealers and undercoaters shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of specialty primers, sealers and undercoaters sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.4 Toxic Exempt Compounds: For each architectural coating that contains perchloroethylene or methylene chloride, the manufacturer shall, on or before April 1 of each calendar year beginning in the year 2004, submit an</p>	<p>Until December 31, 2010 both versions of the rule have the same reporting requirements. After that date the non-SIP approved rule includes very specific information to be kept and is required for all architectural coatings. Therefore, non-SIP version of rule is as stringent as SIP version.</p>

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>6.2.4.2 the product category listed in the Table of Standards to which the coating belongs;</p> <p>6.2.4.3 the total sales in California during the calendar year to the nearest gallon;</p> <p>6.2.4.4 the volume percent, to the nearest 0.10 percent, of perchloroethylene and methylene chloride in the coating.</p> <p>6.2.5 Recycled Coatings: Manufacturers of recycled coatings must submit a letter to the Executive Officer of the ARB certifying their status as a Recycled Paint Manufacturer. The manufacturer shall, on or before April 1 of each calendar year beginning with the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall include, for all recycled coatings, the total number of gallons distributed in the State during the preceding year, and shall describe the method used by the manufacturer to calculate State distribution.</p> <p>6.2.6 Bituminous Coatings: Each manufacturer of bituminous roof coatings or bituminous roof primers shall, on or before April 1 of each calendar year beginning with the year 2004, submit an annual report to the Executive Officer of ARB. The report shall specify the number of gallons of bituminous roof coatings or bituminous roof primers sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p>	<p>annual report to the Executive Officer of the ARB the following information for products sold in the State during the preceding year:</p> <p>6.2.4.1 the product brand name and a copy of the product label with legible usage instructions;</p> <p>6.2.4.2 the product category listed in the Table of Standards 1 or the Table of Standards 2 to which the coating belongs;</p> <p>6.2.4.3 the total sales in California during the calendar year to the nearest gallon;</p> <p>6.2.4.4 the volume percent, to the nearest 0.10 percent, of perchloroethylene and methylene chloride in the coating.</p> <p>6.2.5 Recycled Coatings: Manufacturers of recycled coatings must submit a letter to the Executive Officer of the ARB certifying their status as a Recycled Paint Manufacturer. The manufacturer shall, on or before April 1 of each calendar year beginning with the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall include, for all recycled coatings, the total number of gallons distributed in the State during the preceding year, and shall describe the method used by the manufacturer to calculate State distribution.</p> <p>6.2.6 Bituminous Coatings: Each manufacturer of bituminous roof coatings or bituminous roof primers shall, on or before April 1 of each calendar year beginning with the year 2004, submit an annual report to the Executive Officer of ARB. The report shall specify the number of gallons of bituminous roof coatings or bituminous roof primers sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate state sales.</p> <p>6.2.7 Effective on and after January 1, 2011, Sales Data: All sales data listed in Sections 6.2.7.1 to 6.2.7.14 shall be maintained on-site by the responsible official for a minimum of three years. A responsible official from each manufacturer shall upon request of the Executive Officer of the ARB, or his or her delegate, provide data concerning the distribution and sales of architectural coatings. Sales data submitted by the responsible official to the Executive Officer of the ARB may be claimed as confidential, and such information shall be handled in accordance with the procedures specified in Title 17,</p>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
		<p>California Code of Regulations Sections 91000-91022. The responsible official shall within 180 days provide information, including, but not limited to the data listed in Sections 6.2.7.1 through 6.2.7.14:</p> <p>6.2.7.1 the name and mailing address of the manufacturer;</p> <p>6.2.7.2 the name, address and telephone number of a contact person;</p> <p>6.2.7.3 the name of the coating product as it appears on the label and the applicable coating category;</p> <p>6.2.7.4 whether the product is marketed for interior or exterior use or both;</p> <p>6.2.7.5 the number of gallons sold in California in containers greater than one liter (1.057 quart) and equal to or less than one liter (1.057 quart);</p> <p>6.2.7.6 the VOC Actual content and VOC Regulatory content in grams per liter. If thinning is recommended, list the VOC Actual content and VOC Regulatory content after maximum recommended thinning. If containers less than one liter have a different VOC content than containers greater than one liter, list separately. If the coating is a multi-component product, provide the VOC content as mixed or catalyzed;</p> <p>6.2.7.7 the names and CAS numbers of the VOC constituents in the product;</p> <p>6.2.7.8 the names and CAS numbers of any compounds in the product specifically exempted from the VOC definition;</p> <p>6.2.7.9 whether the product is marketed as solvent-borne, waterborne, or 100% solids;</p> <p>6.2.7.10 description of resin or binder in the product;</p> <p>6.2.7.11 whether the coating is a single-component or multi-component product;</p> <p>6.2.7.12 the density of the product in pounds per gallon;</p> <p>6.2.7.13 the percent by weight of: solids, all volatile materials, water, and any compounds in the product specifically exempted from the VOC definition; and</p> <p>6.2.7.14 the percent by volume of: solids, water, and any compounds in the product specifically exempted from the VOC definition.</p>	

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	<p>6.3 Test Methods</p> <p>6.3.1 VOC Content of Coatings: To determine the physical properties of a coating in order to perform the calculations in Section 3.26 and 3.27, the reference method for VOC content is U.S. EPA Method 24, except as provided in Sections 6.3.2 and 6.3.15. An alternative method to determine the VOC content of coatings is SCAQMD Method 304-91 (Revised February 1996), incorporated by reference in Section 6.3.14. The exempt compounds content shall be determined by SCAQMD Method 303-91 (Revised August 1996), incorporated by reference in Section 6.3.12. To determine the VOC content of a coating, the manufacturer may use U.S. EPA Method 24, or an alternative method as provided in Section 6.3.2, formulation data, or any other reasonable means for predicting that the coating has been formulated as intended (e.g., quality assurance checks, recordkeeping). However, if there are any inconsistencies between the results of a Method 24 test and any other means for determining VOC content, the Method 24 test results will govern, except when an alternative method is approved as specified in Section 6.3.2. The District Air Pollution Control Officer (APCO) may require the manufacturer to conduct a Method 24 analysis.</p> <p>6.3.2 Alternative Test Methods: Other test methods demonstrated to provide results that are acceptable for purposes of determining compliance with Section 6.3.1, after review and approved in writing by the staffs of the District, the ARB and the U.S. EPA, may also be used. 6.3.3 Methacrylate Traffic Marking Coatings: Analysis of methacrylate multicomponent coatings used as traffic marking coatings shall be conducted according to a modification of U.S. EPA Method 24 (40 CFR 59, subpart D, Appendix A), incorporated by reference in Section 6.3.15. This method has not been approved for methacrylate multicomponent coatings used for other purposes than as traffic marking coatings or for other classes of multicomponent coatings.</p> <p>6.3.4 Flame Spread Index: The flame spread index of a fire-retardant coating shall be determined by ASTM Designation E 84-99, "Standard Test Method for Surface Burning Characteristics of Building Materials"(see Section 3, Fire-Retardant Coating).</p> <p>6.3.5 Fire Resistance Rating: The fire</p>	<p>6.3 Test Methods</p> <p>The test methods listed below shall be used to demonstrate compliance with this rule. Alternate equivalent test methods may be used provided the test methods have been approved by the APCO and EPA.</p> <p>6.3.1 Calculation of VOC Content: For the purpose of determining compliance with the VOC content limits in the Table of Standards 1 or the Table of Standards 2, the VOC content of a coating shall be determined as defined in Section 3.77, 3.78, or 3.79 as appropriate. The VOC content of a tint base shall be determined without colorant that is added after the tint base is manufactured. If the manufacturer does not recommend thinning, the VOC Content must be calculated for the product as supplied. If the manufacturer recommends thinning, the VOC Content must be calculated including the maximum amount of thinning solvent recommended by the manufacturer. If the coating is a multi-component product, the VOC content must be calculated as mixed or catalyzed. If the coating contains silanes, siloxanes, or other ingredients that generate ethanol or other VOC during the curing process, the VOC content must include the VOCs emitted during curing.</p> <p>6.3.2 VOC Content of Coatings: To determine the physical properties of a coating in order to perform the calculations in Section 3.77 and 3.79, the reference method for VOC content is EPA Method 24, except as provided in Sections 6.3.3 and 6.3.16. An alternative method to determine the VOC content of coatings is SCAQMD Method 304-91 (Revised February 1996). The exempt compounds content shall be determined by SCAQMD Method 303-91 (Revised 1993), BAAQMD Method 43 (Revised 1996), or BAAQMD Method 41 (Revised 1995), as applicable. To determine the VOC content of a coating, the manufacturer may use EPA Method 24, or an alternative method as provided in Section 6.3.3, formulation data, or any other reasonable means for predicting that the coating has been formulated as intended (e.g., quality assurance checks, recordkeeping). However, if there are any inconsistencies between the results of EPA Method 24 test and any other means for determining VOC content, the EPA Method 24</p>	<p>The non-SIP version includes all the requirements of the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</p>

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>resistance rating of a fire-resistive coating shall be determined by ASTM Designation E 119-98, "Standard Test Methods for Fire Tests of Building Construction Materials"(see Section 3, Fire-Resistive Coating).</p> <p>6.3.6 Gloss Determination: The gloss of a coating shall be determined by ASTM Designation D 523-89 (1999), "Standard Test Method for Specular Gloss"(see Section 3, Flat Coating, Nonflat Coating, Nonflat-High Gloss Coating and Quick-Dry Enamel).</p> <p>6.3.7 Metal Content of Coatings: The metallic content of a coating shall be determined by SCAQMD Method 318-95, Determination of Weight Percent Elemental Metal in Coatings by X-Ray Diffraction, <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i> (see Section 3, Metallic Pigmented Coating).</p> <p>6.3.8 Acid Content of Coatings: The acid content of a coating shall be determined by ASTM Designation D 1613-96, "Standard Test Method for Acidity in Volatile Solvents and Chemical Intermediates Used in Paint, Varnish, Lacquer and related products"(see Section 3, Pre-Treatment Wash Primer).</p> <p>6.3.9 Drying Times: The set-to-touch, dry-hard, dry-to-touch and dry-to-recoat times of a coating shall be determined by ASTM Designation D 1640-95, "Standard Test Methods for Drying, Curing, or Film Formation of Organic Coatings at Room Temperature" (see Section 3, Quick-Dry Enamel and Quick-Dry Primer, Sealer and Undercoater) The tack-free time of a quickdry enamel coating shall be determined by the Mechanical Test Method of ASTM Designation D 1640-95.</p> <p>6.3.10 Surface Chalkiness: The chalkiness of a surface shall be determined using ASTM Designation D4214-98, "Standard Test Methods for Evaluating the Degree of Chalking of Exterior Paint Films"(see Section 3, Specialty Primer, Sealer and Undercoater).</p> <p>6.3.11 Exempt Compounds—Siloxanes: Exempt compounds that are cyclic, branched, or linear completely methylated siloxanes, shall be analyzed as exempt compounds for compliance with Section 6 by BAAQMD Method 43, "Determination of Volatile Methylsiloxanes in Solvent-Based Coatings, Inks, and Related Materials," <i>BAAQMD Manual of Procedures</i>, Volume III, adopted 11/6/96 (see Section 3, Volatile Organic Compound, and Section 6.3.1).</p> <p>6.3.12 Exempt Compounds—</p>	<p>test results will govern, except when an alternative method is approved as specified in Section 6.3.3. The District Air Pollution Control Officer (APCO) may require the manufacturer to conduct an EPA Method 24 analysis.</p> <p>6.3.3 Alternative Test Methods: Other test methods demonstrated to provide results that are acceptable for purposes of determining compliance with Section 6.3.2 4, after review and approved in writing by the staffs of the District, ARB and EPA, may also be used.</p> <p>6.3.4 Methacrylate Traffic Marking Coatings: Analysis of methacrylate multicomponent coatings used as traffic marking coatings shall be conducted according to a modification of EPA Method 24 (40 CFR 59, subpart D, Appendix A). This method has not been approved for methacrylate multicomponent coatings used for other purposes than as traffic marking coatings or for other classes of multicomponent coatings.</p> <p>6.3.5 Flame Spread Index: The flame spread index of a fire-retardant coating shall be determined by ASTM E84-07, "Standard Test Method for Surface Burning Characteristics of Building Materials" (see Section 3.0, Fire-Retardant Coating).</p> <p>6.3.6 Fire Resistance Rating: The fire resistance rating of a fire-resistive coating shall be determined by ASTM E119-07, "Standard Test Methods for Fire Tests of Building Construction Materials" (see Section 3.0, Fire-Resistive Coating).</p> <p>6.3.7 Gloss Determination: The gloss of a coating shall be determined by ASTM D523-89 (1999), "Standard Test Method for Specular Gloss" (see Section 3.0, Flat Coating, Nonflat Coating, Nonflat-High Gloss Coating and Quick-Dry Enamel).</p> <p>6.3.8 Metal Content of Coatings: The metallic content of a coating shall be determined by SCAQMD Method 318-95, Determination of Weight Percent Elemental Metal in Coatings by X-Ray Diffraction, <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i> (see Section 3.0, Metallic Pigmented Coating, Aluminum Roof Coating and Faux Finish).</p> <p>6.3.9 Acid Content of Coatings: The acid content of a coating shall be determined by ASTM D1613-06, "Standard Test Method for Acidity in Volatile Solvents and Chemical Intermediates Used in Paint, Varnish, Lacquer and related products" (see Section 3.0, Pre-Treatment Wash Primer).</p>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>Parachlorobenzotrifluoride (PCBTF): The exempt compound parachlorobenzotrifluoride, shall be analyzed as an exempt compound for compliance with Section 6 by BAAQMD Method 41, "Determination of Volatile Organic Compounds in Solvent Based Coatings and Related Materials Containing Parachlorobenzotrifluoride," <i>BAAQMD Manual of Procedures</i>, Volume III, adopted 12/20/95 (see Section 3, Volatile Organic Compound, and Section 6.3.1).</p> <p>6.3.13 Exempt Compounds: The content of compounds under U.S. EPA Method 24 shall be analyzed by SCAQMD Method 303-91 (Revised 1996), "Determination of Exempt Compounds," <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i> (see Section 3, Volatile Organic Compound, and Section 6.3.1).</p> <p>6.3.14 VOC Content of Coatings: The VOC content of a coating shall be determined by U.S. EPA Method 24 as it exists in appendix A of 40 <i>Code of Federal Regulations</i> (CFR) part 60, "Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings"(see Section 6.3.1).</p> <p>6.3.15 Alternative VOC Content of Coatings: The VOC content of coatings may be analyzed either by U.S. EPA Method 24 or SCAQMD Method 304-91 (Revised 1996), "Determination of Volatile Organic Compounds (VOC) in Various Materials," <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i> (see Section 6.3.1).</p> <p>6.3.16 Methacrylate Traffic Marking Coatings: The VOC content of methacrylate multicomponent coatings used as traffic marking coatings shall be analyzed by the procedures in 40 CFR part 59, subpart D, appendix A, "Determination of Volatile Matter Content of Methacrylate Multicomponent Coatings Used as Traffic Marking Coatings" (September 11, 1998) (see Section 6.3.3).</p>	<p>6.3.10 Drying Times: The set-to-touch, dry-hard, dry-to-touch and dry-to-recoat times of a coating shall be determined by ASTM D1640-95, "Standard Test Methods for Drying, Curing, or Film Formation of Organic Coatings at Room Temperature" (see Section 3.0, Quick-Dry Enamel and Quick-Dry Primer, Sealer and Undercoater) The tack-free time of a quick-dry enamel coating shall be determined by the Mechanical Test Method of ASTM D1640-95. (Category deleted effective January 1, 2011.)</p> <p>6.3.11 Surface Chalkiness: The chalkiness of a surface shall be determined using ASTM D4214-98, "Standard Test Methods for Evaluating the Degree of Chalking of Exterior Paint Films"(see Section 3, Specialty Primer, Sealer and Undercoater). (Category deleted effective January 1, 2011.)</p> <p>6.3.12 Exempt Compounds—Siloxanes: Exempt compounds that are cyclic, branched, or linear completely methylated siloxanes, shall be analyzed as exempt compounds for compliance with Section 6 by BAAQMD Method 43, "Determination of Volatile Methylsiloxanes in Solvent-Based Coatings, Inks, and Related Materials," <i>BAAQMD Manual of Procedures</i>, Volume III, adopted 11/6/96 (see Section 3.0, Volatile Organic Compound, and Section 6.3.2).</p> <p>6.3.13 Exempt Compounds—Parachlorobenzotrifluoride (PCBTF): The exempt compound parachlorobenzotrifluoride, shall be analyzed as an exempt compound for compliance with Section 6 by BAAQMD Method 41, "Determination of Volatile Organic Compounds in Solvent Based Coatings and Related Materials Containing Parachlorobenzotrifluoride," <i>BAAQMD Manual of Procedures</i>, Volume III, adopted 12/20/95 (see Section 3.0, Volatile Organic Compound, and Section 6.3.2).</p> <p>6.3.14 Exempt Compounds: The content of compounds under U.S. EPA Method 24 shall be analyzed by SCAQMD Method 303-91 (Revised 1993), "Determination of Exempt Compounds," <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i> (see Section 3.0, Volatile Organic Compound, and Section 6.3.2).</p> <p>6.3.15 VOC Content of Coatings: The VOC content of a coating shall be determined by EPA Method 24 as it exists in appendix A of 40 <i>Code of</i></p>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
		<p><i>Federal Regulations (CFR) part 60, "Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings" (see Section 6.3.2).</i></p> <p>6.3.16 Alternative VOC Content of Coatings: The VOC content of coatings may be analyzed either by U.S. EPA Method 24 or SCAQMD Method 304-91 (Revised 1996), "Determination of Volatile Organic Compounds (VOC) in Various Materials," <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples.</i></p> <p>6.3.17 Methacrylate Traffic Marking Coatings: The VOC content of methacrylate multicomponent coatings used as traffic marking coatings shall be analyzed by the procedures in 40 CFR part 59, subpart D, appendix A, "Determination of Volatile Matter Content of Methacrylate Multicomponent Coatings Used as Traffic Marking Coatings" (September 11, 1998).</p> <p>6.3.18 Hydrostatic Pressure for Basement Specialty Coatings: The hydrostatic pressure resistance for basement specialty coatings shall be analyzed using ASTM D7088-04, "Standard Practice for Resistance to Hydrostatic Pressure for Coatings Used in Below Grade Applications Applied to Masonry".</p> <p>6.3.19 Tub and Tile Refinish Coating Adhesion: The adhesion of tub and tile coating shall be determined by ASTM D4585-99, "Standard Practice for Testing Water Resistance of Coatings Using Controlled Condensation" and ASTM D3359-02, "Standard Test Methods for Measuring Adhesion by Tape Test".</p> <p>6.3.20 Tub and Tile Refinish Coating Hardness: The hardness of tub and tile refinish coating shall be determined by ASTM D3363-05, "Standard Test Method for Film Hardness by Pencil Test".</p> <p>6.3.21 Tub and Tile Refinish Coating Abrasion Resistance: Abrasion resistance of tub and tile refinish coating shall be analyzed by ASTM D4060-07, "Standard Test Methods for Abrasion Resistance of Organic Coatings by the Taber Abraser".</p> <p>6.3.22 Tub and Tile Refinish Coating Water Resistance: Water resistance of tub and tile refinish coatings shall be determined by ASTM D4585-99, "Standard Practice for Testing Water Resistance of Coatings Using Controlled Condensation" and ASTM D714-02e1, "Standard Test Method</p>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
		<p>for Evaluating Degree of Blistering of Paints".</p> <p>6.3.23 Waterproofing Membrane: Waterproofing membrane shall be tested by ASTM C836-06, "Standard Specification for High Solids Content, Cold Liquid-Applied Elastomeric Waterproofing Membrane for Use with Separate Wearing Course".</p> <p>6.3.24 Mold and Mildew Growth for Basement Specialty Coatings: Mold and mildew growth resistance for basement specialty coatings shall be determined by ASTM D3273-00, "Standard Test Method for Resistance to Growth of Mold on the Surface of Interior Coatings in an Environmental Chamber" and ASTM D3274-95, "Standard Test Method for Evaluating Degree of Surface Disfigurement of Paint Films by Microbial (Fungal or Algal) Growth or Soil and Dirt Accumulation".</p> <p>6.3.25 Reactive Penetrating Sealer Water Repellency: Reactive penetrating sealer water repellency shall be analyzed by ASTM C67-07, "Standard Test Methods for Sampling and Testing Brick and Structural Clay Tile"; or ASTM C97-02, "Standard Test Methods for Absorption and Bulk Specific Gravity of Dimension Stone"; or ASTM C140-06, "Standard Test Methods for Sampling and Testing Concrete Masonry Units and Related Units".</p> <p>6.3.26 Reactive Penetrating Sealer Water Vapor Transmission: Reactive penetrating sealer water vapor transmission shall be analyzed ASTM E96/E96M-05, "Standard Test Method for Water Vapor Transmission of Materials".</p> <p>6.3.27 Reactive Penetrating Sealer - Chloride Screening Applications: Reactive penetrating sealers shall be analyzed by National Cooperative Highway Research Report 244 (1981), "Concrete Sealers for the Protection of Bridge Structures".</p> <p>6.3.28 Stone Consolidants: Stone consolidants shall be tested using ASTM E2167-01, "Standard Guide for Selection and Use of Stone Consolidants".</p>	
7.0 Compliance Schedule	Persons subject to this rule shall be in compliance with this rule by October 31, 2001.	Persons subject to this rule shall be in compliance with this rule by the dates specified within the rule.	No change in the requirements, therefore, non-SIP version of rule is as stringent as SIP version.
8.0 Averaging Compliance Option	8.1 On or after January 1, 2003, in lieu of compliance with the specified limits in the Table of Standards for floor coatings; industrial maintenance coatings; primers, sealers, and undercoaters; quick-dry primers, sealers, and undercoaters; quick-dry enamels; roof coatings; rust		No change in the requirements, therefore, non-SIP version of rule is as stringent as SIP version.

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>preventative coatings; stains; waterproofing sealers, as well as flats and non-flats (excluding recycled coatings), manufacturers may average designated coatings such that their actual cumulative emissions from the averaged coatings are less than or equal to the cumulative emissions that would have been allowed under those limits over a compliance period not to exceed one year. Such manufacturers must also comply with the averaging provisions contained in this Section, as well as maintain and make available for inspection records for at least three years after the end of the compliance period. This Section shall cease to be effective on January 1, 2005, after which averaging will no longer be allowed.</p> <p>Per Section 8.1, averaging is no longer applicable. Therefore, Section 8.2 through 8.14 are not listed.</p>		

District Rule 4601 was amended (12/17/2009). As analyzed, each amended section of the non-SIP version of the rule is at least as stringent as, or more stringent than the corresponding section of the SIP version of the rule. Therefore, it is concluded that overall the non-SIP version of the rule is more stringent than the SIP version of the rule.