



JUN 03 2016

Mr. Dan Deditius
Prison Industry Authority, Avenal
1 Kings Way
Avenal, CA 93204

**Re: Notice of Minor Title V Permit Modification
District Facility # C-954
Project # C-1161300**

Dear Mr. Deditius:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued C-954-3-7 (under project C-1151495) into the Title V operating permit. Authority to Construct C-954-3-7 was issued to authorize the replacement of 3 CNC routers and the installation of one new edge bander for an existing woodworking operation. The equipment is controlled by an existing baghouse dust collection system.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued C-954-3-7, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

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

Thank you for your cooperation in this matter.

Sincerely,


Arnaud Marjollet
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

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

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

TITLE V APPLICATION REVIEW

Minor Modification
Project #: C-1161300

Engineer: Andrea Ogden
Date: May 18, 2016

Facility Number: C-954
Facility Name: Prison Industry Authority -- Avenal
Mailing Address: 1 Kings Way
Avenal, CA 93204

Contact Name: Dan Deditius
Phone: (559) 386-6057

Responsible Official: Dan Deditius
Title: Superintendent

I. PROPOSAL

Prison Industry Authority -- Avenal is proposing a Title V minor permit modification to incorporate recently issued C-954-3-7 (under project C-1151495) into the Title V operating permit. Authority to Construct C-954-3-7 was issued to authorize the replacement of 3 CNC routers and the installation of one new edge bander for an existing woodworking operation. The equipment is controlled by an existing baghouse dust collection system.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

II. FACILITY LOCATION

1 Kings Way, Avenal, CA

III. EQUIPMENT DESCRIPTION

C-954-3-9: WOOD FURNITURE FACTORY LOCATED IN BLDG #290 WITH WOODWORKING OPERATION CONSISTING OF 4 TABLE SAWS, 1 CHOP SAW, 1 BAND SAW, 2 PANEL SAWS, 1 CNC PANEL SAW, 1 CNC SAW, 5 SANDERS, 2 SHAPERS, 1 CLEANER, 1 PLANER, 2 EDGE BANDERS, 5 CNC ROUTERS, 1 PIN ROUTER, 2 DRAWER DOVETAILER AND OTHER

RELATED EQUIPMENT, ALL SERVED BY AN R.P. RICHARDS MODEL 12-216-3464 BAGHOUSE DUST COLLECTOR WITH REVERSE PULSED-JET CLEANING SYSTEM

IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

Prison Industry Authority -- Avenal is proposing a Title V minor permit modification to incorporate recently issued C-954-3-7 (under project C-1151495) into the Title V operating permit. Authority to Construct C-954-3-7 was issued to authorize the replacement of 3 CNC routers and the installation of one new edge bander for an existing woodworking operation. The equipment is controlled by an existing baghouse dust collection system.

C-954-3-7:

All conditions from the current Permit to Operate (C-954-3-6) were included on ATC C-954-3-7. Conditions 1 and 4 through 21 on ATC C-954-3-7 are included on the proposed Permit to Operate.

Permit condition 2 on the current Permit to Operate (condition 3 on ATC C-954-3-7) was not included on the proposed Permit to Operate. This condition is redundant to condition 23 on the facility-wide requirements.

Condition 2 on ATC C-954-3-7 was not added to the proposed Permit to Operate because it is included on the facility-wide requirements as condition 1.

Condition 22 on ATC C-954-3-7 was not added to the proposed Permit to Operate because it has been fulfilled by submitting the application for this project and is not applicable for an Operating Permit.

Conditions 6 and 18 on ATC C-954-3-7 were added to the proposed Permit to Operate as conditions 4 and 16 as daily emission limits as required by Rule 2201.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, these modifications:

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

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permit
- B. Authority to Construct
- C. Emissions Increases
- D. Application
- E. Previous Title V Operating Permit

ATTACHMENT A

Proposed Modified Title V Operating Permit

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-954-3-9

EXPIRATION DATE: 08/31/2017

EQUIPMENT DESCRIPTION:

WOOD FURNITURE FACTORY LOCATED IN BLDG #290 WITH WOODWORKING OPERATION CONSISTING OF 4 TABLE SAWS, 1 CHOP SAW, 1 BAND SAW, 2 PANEL SAWS, 1 CNC PANEL SAW, 1 CNC SAW, 5 SANDERS, 2 SHAPERS, 1 CLEANER, 1 PLANER, 2 EDGE BANDERS, 5 CNC ROUTERS, 1 PIN ROUTER, 2 DRAWER DOVETAILER AND OTHER RELATED EQUIPMENT, ALL SERVED BY AN R.P. RICHARDS MODEL 12-216-3464 BAGHOUSE DUST COLLECTOR WITH REVERSE PULSED-JET CLEANING SYSTEM

PERMIT UNIT REQUIREMENTS

1. 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 Rule 2201] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. Visible emissions from the exhaust of the dust collector serving the woodworking operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The amount of sawdust collected shall not exceed 2,160 pounds per day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The PM10 emissions from the dust collector shall not exceed 1.1 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. All ducting and control equipment shall be in good working order to prevent fugitive particulate emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
7. All filters shall be properly maintained and must be in place during the woodworking operation(s). [District Rule 2201] Federally Enforceable Through Title V Permit
8. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The baghouse 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] Federally Enforceable Through Title V Permit
10. The baghouse shall operate at all times with a minimum differential pressure of 0.5 inches water column and a maximum differential pressure of 4 inches water column. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Dust collector exhaust fan(s) shall be switched on prior to the start-up of any woodworking equipment. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Replacement bags numbering at least 10% of the total number of bags in the baghouse shall be maintained on the premises. [District Rule 2201] 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.

14. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter breakthrough and shall be replaced as needed. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Permittee shall record on a daily basis the amount of sawdust collected in pounds. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Records of dust collector maintenance, inspections, and repairs including all change outs of filter media, 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 2201] Federally Enforceable Through Title V Permit
18. Records of the daily differential operating pressure readings shall be retained on-site. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

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

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ATTACHMENT B

Authority to Construct



AUTHORITY TO CONSTRUCT

PERMIT NO: C-954-3-7

ISSUANCE DATE: 07/28/2015

LEGAL OWNER OR OPERATOR: PRISON INDUSTRY AUTHORITY--AVENAL

MAILING ADDRESS: #1 KINGS WAY
AVENAL, CA 93204

LOCATION: 1 KINGS WAY
AVENAL, CA 93204

EQUIPMENT DESCRIPTION:

MODIFICATION OF WOOD FURNITURE FACTORY LOCATED IN BLDG #290 WITH WOODWORKING OPERATION CONSISTING OF 4 TABLE SAWS, 1 CHOP SAW, 1 BAND SAW, 2 PANEL SAWS, 1 CNC PANEL SAW, 1 CNC SAW, 5 SANDERS, 2 SHAPERS, 1 CLEANER, 1 PLANER, 1 EDGE BANDER, 4 CNC ROUTERS, 1 PIN ROUTER, 2 DRAWER DOVETAILER AND OTHER RELATED EQUIPMENT, ALL SERVED BY AN R.P. RICHARDS MODEL 12-216-3464 BAGHOUSE DUST COLLECTOR WITH REVERSE PULSED-JET CLEANING SYSTEM: REPLACE TWO OF THE FOUR EXISTING CNC ROUTERS WITH THREE NEW CNC ROUTERS (5 TOTAL) AND INSTALL AN ADDITIONAL EDGE BANDER (2 TOTAL)

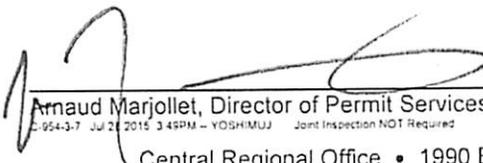
CONDITIONS

1. 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 Rule 2201] Federally Enforceable Through Title V Permit
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. 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
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. Visible emissions from the exhaust of the dust collector serving the woodworking operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The amount of sawdust collected shall not exceed 2,160 pounds per day. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE

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

Seyed Sadredin, Executive Director / APCO



Arnaud Marjollet, Director of Permit Services
C-954-3-7 Jul 28 2015 3:45PM - YOSHIMUJ Joint Inspection NOT Required

7. The PM10 emissions from the dust collector shall not exceed 1.1 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. All ducting and control equipment shall be in good working order to prevent fugitive particulate emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
9. All filters shall be properly maintained and must be in place during the woodworking operation(s). [District Rule 2201] Federally Enforceable Through Title V Permit
10. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The baghouse 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] Federally Enforceable Through Title V Permit
12. The baghouse shall operate at all times with a minimum differential pressure of 0.5 inches water column and a maximum differential pressure of 4 inches water column. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Dust collector exhaust fan(s) shall be switched on prior to the start-up of any woodworking equipment. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Replacement bags numbering at least 10% of the total number of bags in the baghouse shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter breakthrough and shall be replaced as needed. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Permittee shall record on a daily basis the amount of sawdust collected in pounds. [District Rule 2201]
19. Records of dust collector maintenance, inspections, and repairs including all change outs of filter media, 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 2201] Federally Enforceable Through Title V Permit
20. Records of the daily differential operating pressure readings shall be retained on-site. [District Rule 2201] Federally Enforceable Through Title V Permit
21. Records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
22. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit

ATTACHMENT C

Emissions Increases

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
C-954-3-7	0	0	0	0	0
TOTAL	0	0	0	0	0

ATTACHMENT D

Application



San Joaquin Valley Air Pollution Control District

www.valleyair.org



Permit Application For:

ADMINISTRATIVE AMENDMENT MINOR MODIFICATION SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: <i>Prison Industry Authority, Avenal State Prison</i>	
2. MAILING ADDRESS:	
STREET/P.O. BOX: <i>1 Kings Way P.O. Box 8</i>	
CITY: <i>Avenal</i>	STATE: <i>CA</i> 9-DIGIT ZIP CODE: <i>93204</i>
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:	
STREET: <i>1 Kings Way</i> CITY: <i>Avenal</i>	INSTALLATION DATE: <i>January 15, 2016</i>
¼ SECTION TOWNSHIP RANGE	
4. GENERAL NATURE OF BUSINESS: <i>Furniture Manufacturing</i>	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) <i>Modification of wood furniture factory located in bldg #290. Replace 2 of the 4 existing CNC Routers with 3 New CNC Routers and install additional 1 Edge bander</i>	
6. TYPE OR PRINT NAME OF APPLICANT: <i>Dan Deditius</i>	TITLE OF APPLICANT: <i>Superintendent</i>
7. SIGNATURE OF APPLICANT: 	DATE: <i>4/14/16</i>
	PHONE: <i>(559) 386-6057</i> FAX: <i>(559) 386-</i> EMAIL: <i>dan.deditius@calpfa.ca.gov</i>

For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: \$ _____	CHECK#: _____
	DATE PAID: _____	
	PROJECT NO: _____	FACILITY ID: _____



San Joaquin Valley Unified Air Pollution Control District



TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

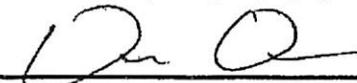
- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: <u>Prison Industry Authority</u>	FACILITY ID: <u>06-21</u>
1. Type of Organization: <input type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input checked="" type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: <u>Avernal State Prison</u>	
3. Agent to the Owner: <u>Dan Dedertius</u>	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:


Signature of Responsible Official

4/14/10
Date

Dan Dedertius
Name of Responsible Official (please print)

Title of Responsible Official (please print)

ATTACHMENT E

Previous Title V Operating Permit

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-954-3-6

EXPIRATION DATE: 08/31/2017

EQUIPMENT DESCRIPTION:

WOOD FURNITURE FACTORY LOCATED IN BLDG #290 WITH WOODWORKING OPERATION CONSISTING OF 4 TABLE SAWS, 1 CHOP SAW, 1 BAND SAW, 2 PANEL SAWS, 1 CNC PANEL SAW, 1 CNC SAW, 5 SANDERS, 2 SHAPERS, 1 CLEANER, 1 PLANER, 1 EDGE BANDER, 4 CNC ROUTERS, 1 PIN ROUTER, 2 DRAWER DOVETAILER AND OTHER RELATED EQUIPMENT, ALL SERVED BY AN R.P. RICHARDS MODEL 12-216-3464 BAGHOUSE DUST COLLECTOR WITH REVERSE PULSED-JET CLEANING SYSTEM

PERMIT UNIT REQUIREMENTS

1. 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 Rule 2201] 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
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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

13. Replacement bags numbering at least 10% of the total number of bags in the baghouse shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
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17. Records of the daily differential operating pressure readings shall be retained on-site. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

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