Santa Barbara County
Air Pollution Control District

Permit to Operate 13570
and Part 70 Minor Modification 13570

EQUIPMENT OWNER:

Imerys Minerals California, Inc. 205129

EQUIPMENT OPERATOR:

Imerys Minerals California, Inc.

EQUIPMENT LOCATION:

2500 Miguelito Road, Lompoc

STATIONARY SOURCE/FACILITY:

Imerys Minerals California, Inc. SSID: 01735
FID: 00012

EQUIPMENT DESCRIPTION:

The equipment subject to this permit is listed in the table at the end of this permit.

PROJECT/PROCESS DESCRIPTION:

Imerys currently mines and processes diatomaceous earth (DE) at its Lompoc Plant. Imerys operates multiple product lines each with "wet end" and "dry end" processing. Wet diatomaceous earth crude is surface mined, crushed, milled and dried and/or calcined at high temperatures. The dried product is classified into a variety of grades and bagged or bulk loaded for shipment to distributors and customers. Other wet and dry processing of diatomite and other materials occurs on a smaller scale at the Synthetic Silicates Plant. This permit authorizes the long term operations of wet processing equipment, two packers and a baghouse for the Synthetic Silicates processing line. Baghouse 5DC-01 controls the particulate emissions from the wet processing equipment. The two packers are controlled by the existing Silicates Plant Ventilation Baghouse (District Dev. No. 142). The Imerys Facility ID is 0012 and the Stationary Source ID is 1735.

CONDITIONS:

9.A Standard Administrative Conditions

In case of discrepancy between the wording of a condition and the applicable District rule, the wording of the rule shall control. The following federally-enforceable administrative permit conditions apply to the Lompoc Plant:

A.1 **Compliance with Permit Conditions.**

(a) The permittee shall comply with all permit conditions in Sections 9.A, 9.B and 9.C.

(b) This permit does not convey property rights or exclusive privilege of any sort.

(c) Any permit noncompliance constitutes a violation of the Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application

(d) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(e) A pending permit action or notification of anticipated noncompliance does not stay any permit condition.

(f) Within a reasonable time period, the permittee shall furnish any information requested by the Control Officer, in writing, for the purpose of determining:

(i) compliance with the permit, or
(ii) whether or not cause exists to modify, revoke and reissue, or terminate a permit or for an enforcement action.

(g) In the event that any condition herein is determined to be in conflict with any other condition contained herein, then, if principles of law do not provide to the contrary, the condition most protective of air quality and public health and safety shall prevail to the extent feasible. [*Ref: 40 CFR Part 70.6.(a)(6), District Rules1303.D.1*]

A.2 **Emergency Provisions.** For the purpose of seeking regulatory relief the permittee shall comply with the requirements of District Rule 505 (sections A, B.1 and D (Breakdown Conditions) and/or District Rule 1303.F, whichever is applicable to the emergency situation. In order to maintain an affirmative defense under Rule 1303.F, the permittee shall provide the District, in writing, a "notice of emergency" within 2 days of the emergency. The "notice of emergency" shall contain the information/documentation listed in Sections (1) through (5) of Rule 1303.F. [*Ref: 40 CFR 70.6(g), District Rule 1303.F*]

A.3 **Compliance Plan.**

(a) The permittee shall comply with all federally-enforceable requirements that become applicable during the permit term, in a timely manner, as identified in the Compliance Plan.

(b) For all applicable equipment, the permittee shall implement and comply with any specific compliance plan required under any federally-enforceable rules or standards. [*Re: District Rule 1302.D.2*]

A.4 **Risk Management Plan.** Should the Imerys facility, as defined in 40 CFR 68.3, become subject to part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in 40 CRF 68.10. The facility shall certify compliance as part of the annual certification as required by 40 CFR part 70. *[40 CFR 68.10]*

A.5 **Right of Entry.** The Regional Administrator of USEPA, the Control Officer, or their authorized representatives, upon the presentation of credentials, shall be permitted to enter upon the premises where a Part 70 Source is located or where records must be kept:

(a) To inspect the stationary source, including monitoring and control equipment, work practices, operations, and emission-related activity, at reasonable times;

(b) To inspect and duplicate, at reasonable times, records required by this Permit to Operate;

(c) To sample substances or monitor emissions from the source or assess other parameters to assure compliance with the permit or applicable requirements, at reasonable times. Monitoring of emissions can include source testing. [*Ref: District Rule 1303.D.2*]

A.6 **Payment of Fees.** The permittee shall reimburse the District for all its Part 70 permit processing and compliance expenses for the stationary source on a timely basis. Failure to reimburse on a timely basis shall be a violation of this permit and of applicable requirements and can result in forfeiture of the Part 70 permit. Operation without a Part 70 permit subjects the source to potential enforcement action by the District and the USEPA pursuant to section 502(a) of the Clean Air Act. [*Ref: District Rules 1303.D.1 and 1304.D.11, 40 CFR 70.6(a)(7)*]

A.7 **Prompt Reporting of Deviations.** The Permittee shall submit a written report to the District documenting each and every deviation from the requirements of this permit or any applicable federal requirements within seven (7) days after discovery of the violation, but not later than six (6) months days after the date of occurrence. The report shall clearly document 1) the probable cause and extent of the deviation 2) equipment involved, 3) the quantity of excess pollutant emissions, if any, and 4) actions taken to correct the deviation. The requirements of this condition shall not apply to deviations reported to District in accordance with Rule 505 (*Breakdown Conditions),* or Rule 1303.F (*Emergency Provisions). [District Rule 1303.D.1, 40 CFR 70.6(a) (3)]*

A.8 **Reporting Requirements/Compliance Certification.** The permittee shall submit compliance certification reports to the USEPA and the Control Officer every six months. These reports shall be submitted on District forms and shall identify each applicable requirement/condition of the permit, the compliance status with each requirement/condition, the monitoring methods used to determine compliance, whether the compliance was continuous or intermittent, and include detailed information on the occurrence and correction of any deviations (excluding emergency upsets) from permit requirement. The reporting periods shall be each half of the calendar year, e.g., January through June for the first half of the year. These reports shall be submitted by September 1 and March 1, respectively, each year. Supporting monitoring data shall be submitted in accordance with the "Semi-Annual Monitoring/Compliance Verification Report" condition in section 9.C (Parts I&II). The permittee shall include a written statement from the responsible official, which certifies the truth, accuracy, and completeness of the reports. [*Ref: District Rules 1303.D.1, 1302.D.3, 1303.2.c*].

A.9 **Federally-enforceable Conditions.** Each federally enforceable condition in this permit shall be enforceable by the USEPA and members of the public. None of the conditions in the District-only enforceable section of this permit are federally enforceable or subject to the public/USEPA review [*Ref: CAAA, § 502(b)(6), 40 CFR 70.6(b)*]

A.10 **Recordkeeping Requirements**. The permittee shall maintain records of required monitoring information that include the following:

(a) The date, place as defined in the permit, and time of sampling or measurements;
(b) The date(s) analyses were performed;
(c) The company or entity that performed the analyses;
(d) The analytical techniques or methods used;
(e) The results of such analyses; and
(f) The operating conditions as existing at the time of sampling or measurement;

The records (electronic or hard copy), as well as all supporting information including calibration and maintenance records, shall be maintained for a minimum of five (5) years from date of initial entry by the permittee and shall be made available to the District upon request. "Supporting information" includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all logs and reports required by the permit. [*Ref: District Rule 1303.D.1.f, 40 CFR 70.6(a)(3)(ii)(A)*]

A.11 **Conditions for Permit Reopening.** The permit shall be reopened and revised for cause under any of the following circumstances:

(a) Additional Requirements: If additional applicable requirements (e.g., NSPS or MACT) become applicable to the source which has an unexpired permit term of three (3) or more years, the permit shall be reopened. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. However, no such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended. All such re-openings shall be initiated only after a 30 day notice of intent to

reopen the permit has been provided to the permittee, except that a shorter notice may be given in case of an emergency.

(b) Inaccurate Permit Provisions: If the District or the USEPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit, the permit shall be reopened. Such re-openings shall be made as soon as practicable.

(c) Applicable Requirement: If the District or the USEPA determines that the permit must be revised or revoked to assure compliance with any applicable requirement including a federally enforceable requirement, the permit shall be reopened. Such re-openings shall be made as soon as practicable.

Administrative procedures to reopen a permit shall follow the same procedures as apply to initial permit issuance. Re-openings shall affect only those parts of the permit for which cause to reopen exists. If the permit is re-opened, and revised, it will be reissued with the expiration date that was listed in the permit before the re-opening. [*Ref: 40 CFR 70.7(f), 40 CFR 70.6(a)*]

A.12 **Indemnity and Separation Clauses**. The Permittee shall defend, indemnify and hold harmless the District or its agents, officers and employees from any claim, action or proceeding against the District or its agents, officers or employees, to attack, set aside, void, or annul, in whole or in part, the approval granted herein. In the event that the District fails promptly to notify the Permittee of any such claim, action or proceeding, or that the District fails to cooperate fully in the defense of said claim, this condition shall thereafter be of no force or effect. In the event that any condition contained herein is determined to be invalid, then all remaining conditions shall remain in force.

9.B Generic Conditions

In case of discrepancy between the wording of a condition and an applicable federal or District rule, the wording of the rule shall control. The generic conditions listed below apply to all emission units regardless of their category or emission rates. These conditions are federally enforceable. Compliance with these requirements is discussed in Section 3.

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

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

(a) As dark or darker in shade as that designated as No. 1 on the Ringlemann Chart, as published by the United States Bureau of Mines, or

(b) Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subsection B.2(a) above.

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

B.3 **Nuisance (Rule 303).** No pollutant emissions from any source at Imerys shall create nuisance conditions. No operations shall endanger health, safety or comfort, nor shall they damage any property or business. [*Ref: District Rule 303*]

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

B.5 **Dust and Fumes - North Zone (Rule 306).** Imerys shall not discharge into the atmosphere, from any source, particulate matter in excess of the concentrations listed in Table 306 (a) of Rule 306. [*Ref: District Rule 306*]

B.6 **Specific Contaminants (Rule 309).** Imerys shall not discharge into the atmosphere from any single source, sulfur compounds or combustion contaminants in excess of the applicable standards listed in Sections A and E of Rule 309. [*Ref: District Rule 309*].

B.7 **Sulfur Content of Fuels (Rule 311).** Imerys shall not burn fuel oil #6 with a sulfur content in excess of 0.5% (by weight), fuel oil #2 with a sulfur content in excess of 0.05% (by weight), #4 fuel oil with sulfur content in excess of 0.31% (by weight) or, gaseous fuel (including propane) in excess of 796 ppmvd or 50 gr/100scf (calculated as H_2S). Imerys shall demonstrate compliance and maintain records for the different fuel types as follows [*Ref: District Rule 311*]:

(a) Fuel oil #2, #4, #6: The permittee shall comply with (i) or (ii)

(i) For each calendar year in which #2, #4 or #6 fuel oil was used, Imerys shall obtain the total sulfur content of the liquid fuel (of each) measured in accordance with ASTM D-2622, D-129, D-1552 or an equivalent reference method which has been previously approved, in writing, by the District.

(ii) Imerys shall maintain written documentation of the total sulfur content of the fuel on a per shipment or quarterly basis. Such documentation shall consist of at least one of the following:

(1) vendor certification
(2) vendor bill of lading
(3) vendor laboratory analysis
(4) equivalent reference testing results which have prior written District approval

(b) Diesel Oil or Gasoline; : The permittee shall comply with (i) or (ii)

(i) Annually, Imerys shall obtain measurements of the total sulfur content of the liquid fuel in accordance with ASTM D-2622, D-129, D-1552 or an equivalent reference method which has been previously approved, in writing, by the District.

(ii) Imerys shall maintain written documentation of the total sulfur content of the fuel on a per shipment basis or quarterly basis. Such documentation shall consist of at least one of the following:

(1) vendor certification
(2) vendor bill of lading
(3) vendor laboratory analysis
(4) equivalent reference testing results which have prior written District approval

(c) Natural gas or Propane: Imerys shall maintain billing records or other data showing that the fuel gas or propane is obtained from a natural gas utility. These records shall be obtained at least annually. Compliance shall also be based on fuel samples obtained during source testing when required by the source test plan.

B.8 **Organic Solvents (Rule 317).** Imerys shall comply with the emission standards listed in Section B of Rule 317. Compliance with this condition shall be based on Imerys's compliance with Rule 317. *[Ref: District Rule 317]*

B.9 **Solvent Cleaning Operations (Rule 321).** Imerys shall comply with the operating requirements of this rule when performing solvent cleaning operations unless relieved by rule exemption. Compliance with this condition shall be based on Imerys's compliance with Condition 9.C.9 of this permit. *[Ref: District Rule 321]*

B.10 **Metal Surface Coating Thinner and Reducer (Rule 322).** The use of photochemically reactive solvents as thinners or reducers in metal surface coatings is prohibited. Compliance with this condition shall be based on Imerys's compliance with Condition 9.C.9 of this permit and facility inspections. *[Ref: District Rule 322]*

B.11 **Architectural Coatings (Rule 323).** Imerys shall comply with the coating ROC content and handling standards listed in Section D of Rule 323 as well as the Administrative requirements listed in Section F of Rule 323. Compliance with this condition shall be based on Imerys's compliance with Condition 9.C.9 of this permit and facility inspections. *[Ref: District Rule 323]*

B.12 **Disposal and Evaporation of Solvents (Rule 324).** Imerys shall not dispose through atmospheric evaporation of more than one and a half gallons of any photochemically reactive solvent per day. Compliance with this condition shall be based on Imerys's compliance with Condition 9.C.9 of this permit and facility inspections. *[Ref: District Rule 324]*

B.13 **Motor Vehicle and Mobile Equipment Coating Operations (Rule 339).** Imerys shall comply with the requirements of this rule when performing coating operations unless relieved by rule exemption. Compliance with this condition shall be based on Imerys's compliance with Condition 9.C.9 of this permit. *[Ref: District Rule 339]*

B.14 **Adhesives and Sealants (Rule 353).** The permittee shall not use adhesives, adhesive bonding primers, adhesive primers, sealants, sealant primers, or any other primers, unless the permittee complies with the following:

(a) Such materials used are purchased or supplied by the manufacturer or suppliers in containers of 16 fluid ounces or less; or alternately

(b) When the permittee uses such materials from containers larger than 16 fluid ounces and the materials are not exempt by Rule 353, Section B.1, the total reactive organic compound emissions from the use of such material shall not exceed 200 pounds per year unless the substances used and the operational methods comply with Sections D, E, F, G, and H of Rule 353. Compliance shall be demonstrated by recordkeeping in accordance with Section B.2 and/or Section O of Rule 353. *[Ref: District Rule 353]*

B.15 **Emergency Episode Plan.** Imerys shall implement the District-approved Emergency Episode Plan issued for the Lompoc Plant as necessary. [*Ref: District Rule 1303, 40 CFR 70.6*]

B.16 **CARB Registered Portable Equipment.** State registered portable equipment shall comply with State registration requirements. A copy of the State registration shall be readily available whenever the equipment is at the facility. *[Ref: District Rule 202]*

B.17 **Rule 360 Compliance.** Any boiler or hot water heater rated at or less than 2.000 MMBtu/hr and manufactured after October 17, 2003 shall be certified per the provisions of Rule 360. An ATC/PTO permit shall be obtained prior to installation of any grouping of Rule 360 applicable boilers or hot water heaters whose combined system design heat input rating exceeds 2.000 MMBtu/hr *[Ref: District Rule 360]*

9.C *Equipment Specific Conditions*

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

C.1 **Emissions Limitations**. Mass emissions and concentrations of PM and PM_{10} from the exhaust stack of the Silicates Plant Baghouse 5DC-01 (Dev. No. 114326) shall not exceed the limits listed below. Compliance shall be based on the operational, monitoring, recordkeeping and reporting conditions of this permit.

(a) Baghouse Mass Emission Limits:

Device Name	Imerys ID	Dev. No.	PM			PM_{10}		
			lb/hr	lb/day	TPY	lb/hr	lb/day	TPY
Baghouse 5DC-01	5DC-01	114326	0.09	2.06	0.38	0.09	2.06	0.38

(b) Baghouse Stack Concentration: The particulate concentration in the exhaust from baghouse 5DC-01 shall not exceed 0.005 gr/dscf.

C.2 **Operating Limitations.** The equipment permitted herein is subject to the following operational restrictions:

(a) Throughput: The combined throughput for Silicates Packer #1 and Silicates Packer #2 shall not exceed 3.30 dry short tons per hour, 79.20 dry short tons per day and 28,908 dry short tons per year of diatomaceous earth.

(b) Enclosed Equipment: All product processing, handling, storage, and packaging equipment permitted herein shall be completely enclosed with any particulate effluent vented to a permitted baghouse.

(c) Visible Emissions: Fugitive emissions from equipment permitted herein shall not exceed 7% opacity. No visible fugitive emissions shall be emitted from any building or structure enclosing this permitted equipment. Compliance with this condition shall be based on the monitoring conditions of this permit.

(d) Baghouse Stack Flow Rate: The maximum exhaust flow rate shall not exceed 2,000 dscfm for baghouse 5DC-01;

(e) Baghouse Pressure Drop: Except during startup operations (defined as powering up the exhaust blower associated with the baghouse and ending with the pressure drop across the baghouse reaching steady state or when the elapsed time since powering up reaches 3 hours,

whichever is sooner), the baghouse pressure drop across baghouse 5DC-01 shall remain between 0.5-6.0 inches H_2O, inclusive.

C.3 **Monitoring.** The equipment permitted herein is subject to the following monitoring requirements:

(a) Imerys shall monitor the packing rate for Silicates Packer #1 and Silicates Packer #2 in dry short tons per day.

(b) Baghouse 5DC-01shall be equipped with District-approved pressure monitoring instrumentation to monitor the pressure drop across the baghouse, in inches H_2O.

(c) Imerys shall obtain a daily reading of the pressure drop when Baghouse 5DC-01 is operational. If the pressure drops falls outside the permitted range, immediate corrective action to return the pressure drop to the range stated in Condition C.2(e) shall be taken.

(d) Once each calendar quarter, Imerys shall perform a fugitive emission inspection for a one-minute period on all equipment permitted herein. If visible emissions are detected during any inspection, then a USEPA Method 9 visible emission evaluation (VEE) shall immediately be performed on the emitting equipment for a six-minute period. A certified Method 9 observer shall perform the VEE and maintain logs in accordance with EPA Method 9.

(e) Once each calendar quarter, Imerys shall use EPA Method 22 to obtain a reading of visible emissions from any building enclosing bagging or packing equipment/operations permitted herein. The Method 22 readings shall be a minimum of five minutes and shall be taken from buildings where bagging or packing operations are being conducted.

C.4 **Recordkeeping**. Imerys shall keep the following records to demonstrate compliance with emission limits, operation limits and monitoring requirements above.

(a) Imerys shall record the packing rate for Silicates Packer #1 and Silicates Packer #2 in dry short tons per day.

(b) Imerys shall record whether or not daily visible emissions are present or the date and initials of a responsible person when the baghouse is non-operational (per condition C.6(a)).

(c) Daily pressure drop across the baghouse, when operational.

(d) For all baghouse malfunction, maintenance, pressure drop and visible emission correction activities:
   i) Date of malfunction, preventive maintenance activity or pressure drop correction activity;
   ii) Description of activity;

iii) Date and time taken to remedy the malfunction or perform maintenance;
iv) If equipment is shut down because the visible emissions could not be eliminated within 24 hours, the date and time of shutdown of the equipment the affected baghouse serves, and the date and time of startup of the equipment served.

(e) For each quarterly Method 9 opacity reading required by Condition C.6(b): the name and most recent Method 9 certification date of the reader, the name of the baghouse, the date and time of the reading, and the reading.

(f) For each quarterly Method 22 fugitive reading required by Condition C.3(e): the date and time of the reading, and whether visible emissions were observed.

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

C.5 **Reporting**. On a semi-annual basis, a report detailing the previous six month's activities shall be provided to the District. The report must list all the data required by condition 9.C.15 of PTO 5840-R4 (*Semi-Annual Monitoring/Compliance Verification Reports).* In addition, this report shall include:

(a) Throughput. The packing rate for Silicates Packer #1 and Silicates Packer #2 in dry short tons per day and totaled for the year.

(b) Visible Emission Observations. Results of daily visible emission observation for which visible emissions were detected for baghouse 5DC-01.

(c) Visible Emission Inspections (Method 9). For baghouse 5DC-01, the results of the quarterly visible emission inspections obtained by the use of USEPA Method 9, which include the date and time of reading, name of reader, most recent Method 9 certification date of reader, baghouse name, individual interval readings required by Method 9, and the final reading.

(d) Fugitive Visible Emission Inspections. For fugitive emissions, the results of the quarterly inspection which include the date and time of reading, name of reader, equipment item and whether fugitive emissions were observed. If a Method 9 was performed, the results of the quarterly visible emission inspections obtained by the use of USEPA Method 9, which include the date and time of reading, name of reader, most recent Method 9 certification date of reader, baghouse name, individual interval readings required by Method 9, and the final reading.

(e) Pressure Drop for Baghouses. The days baghouse 5DC-01 pressure drop is outside the range, the actual pressure drop readings and all corrective actions implemented to return the pressure drop to the value listed in Condition C.2(e) of this permit.

(f) Hours of Operation. On a monthly basis, the operating hours for baghouse 5DC-01

C.6 **Baghouse Maintenance and Inspection.** Imerys shall comply with the following baghouse maintenance and inspection practices:

(a) Visible Emission Observations: For baghouse 5DC-01, Imerys shall observe the baghouse daily when operational. On any day the baghouse is not operating, Imerys shall have a responsible person make a written entry in the applicable baghouse operation log noting that the baghouse was not in operation. The responsible person shall certify the entry by initialing or signing their name next to the entry. Imerys shall perform a visual inspection of the baghouse and baghouse exhaust once per day. If visible emissions are observed during the daily observation, corrective action shall be immediately implemented. If visible emissions are not eliminated within 24 hours, Imerys shall shut down the equipment controlled by the baghouse until corrective action that eliminates visible emissions is completed or obtain a variance from the District Hearing Board.

(b) Visible Emissions Inspections (Method 9): Once each calendar quarter, Imerys shall use EPA Method 9 performed by a certified observer to obtain a reading of visible emissions from the stack of baghouse 5DC-01. The Method 9 readings shall be taken in calendar quarters during which the baghouse operated and shall be taken when the baghouse is operating due to operation of some or all of the equipment it serves.

(c) Baghouse 5DC-01 shall be maintained consistently with the District-approved baghouse inspection and maintenance plan (approved 4/5/2012).

C.7 **Source Testing.** The following source testing provisions shall apply:

Imerys shall conduct source testing of baghouse 5DC-01 in accordance with Table 7a at the end of this condition. Baghouse 5DC-01 shall be added to Baghouse Equipment Source Test Grouping number 3 of Table 9.11 of PTO 5840-R4, and shall be tested according to the frequency schedule outlined in Condition C.11 of PTO 5840-R4.

The permittee shall submit a written source test plan to the District for approval at least thirty (30) days prior to initiation of source testing. The source test plan shall be prepared consistent with the District's Source Test Procedures Manual (revised May 1990 and all subsequent revisions). Written District approval of this plan shall be obtained prior to commencement of source testing. The District shall be notified at least ten (10) calendar days prior to the start of source testing activity to arrange for a mutually agreeable source test date when District personnel may observe the test.

Source test results shall be submitted to the District within forty-five (45) calendar days following the date of source test completion and shall be consistent with the requirements approved within the source test plan. Source test results shall document the permittee's compliance status with the permitted emission limits. All District costs associated with the review and approval of all plans and reports and the witnessing of tests shall be paid by the permittee as provided for by Rule 210.

A source test for an item of equipment shall be performed on the scheduled day of testing (the test day mutually agreed to) unless circumstances beyond the control of the operator prevent completion of the test on the scheduled day. Such circumstances include mechanical malfunction of the equipment to be tested, malfunction of the source test equipment, delays in source test contractor arrival and/or set-up, or unsafe conditions on site. Except in cases of an emergency, the operator shall seek and obtain District approval before deferring or discontinuing a scheduled test, or performing maintenance on the equipment item on the scheduled test day. If the test can not be completed on the scheduled day, then the test shall be rescheduled for another time with prior authorization by the District. Once the sample probe has been inserted into the exhaust stream of the equipment unit to be tested (or extraction of the sample has begun), the test shall proceed in accordance with the approved source test plan. In no case shall a test run be aborted except in the case of an emergency or unless approval is first obtained from the District. Failing to perform the source test of an equipment item on the scheduled test day without a valid reason and without District's authorization shall constitute a violation of this permit. If a test is postponed due to an emergency, written documentation of the emergency event shall be submitted to the District by the close of the business day following the scheduled test day.

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

Table 7a. Source Test Requirements [a]

Eqpmt ID/ Group No.	Equipment or Product	Test Requirements (units)	USEPA Method	Pollutants
Dev. No. 114326	Baghouse 5DC-01	Mass emission rate (lb/hr) Outlet concentration (gr/dscf)	5 5/17	PM/PM_{10}
		Outlet flow rate (dscfm)	2	PM/PM_{10}

[a] PM is total suspended particulates; and use of $PM:PM_{10}$ ratio = 1 allows testing for PM only.

C.8 **Testing Facilities**. The permittee shall provide testing facilities at each baghouse in accordance with Rule 205.E and as specified below:

(a) Sampling ports adequate for test methods applicable to the equipment being tested. This includes (i) constructing the air pollution control system such that volumetric flow rates and pollutant emission rates can be accurately determined by applicable test methods and procedures and (ii) providing a stack or duct free of cyclonic flow as demonstrated by applicable EPA, CARB and District test methods and procedures.

(b) Safe sampling platform(s).

(c) Safe access to sampling platform(s).

(d) Utilities for sampling and testing equipment.

C.9 **Equipment Maintenance.** The equipment listed in this permit shall be properly maintained and kept in good condition at all times. The equipment manufacturer's maintenance manual, maintenance procedures and/or maintenance checklists (if any) shall be kept on site.

C.10 **Documents Incorporated by Reference.** The documents listed below, including any District-approved updates thereof, are incorporated herein by reference and shall have the full force and effect of a permit condition for this permit. These documents shall be implemented for the life of the Project and shall be made available to District inspection staff upon request.

(a) *Baghouse 5DC-01 Inspection and Maintenance Plan* (Approved 4/5/2012).

9.D District-Only Conditions

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

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

(a) The USEPA has provided written comments to the District and these comments require no modification to this permit. The District will issue a letter stating that this permit is a final Part 70 permit. The effective date that this permit will be considered a final Part 70 permit will be the date stamped on the District's letter.

(b) After the USEPA has provided the District written comments that require a modification to this permit, the District will modify this permit to address the USEPA's comments and issue the Part 70 permit as final. The re-issued permit will supersede this permit in its entirety.

AIR POLLUTION CONTROL OFFICER

NOV 0 1 2012

DATE

Attachments:

- Permit Equipment List(s)
- Permit Evaluation for Permit to Operate 13570

Notes:

- Reevaluation Due Date: March 1, 2015
- Stationary sources are subject to an annual emission fee (see Fee Schedule B-3 of Rule 210).
- Annual reports are due by March 1st of each year.
- This permit supersedes ATC 13570-01 and ATC 13570-02

PERMIT EQUIPMENT LIST - TABLE A

PTO 13570 / FID: 00012 Imerys Minerals California, Inc. / SSID: 01735

A PERMITTED EQUIPMENT

1 Synthetic Silicate Production Line

1.1 Synthetic Silicate (processing line)

1.1.1 Silicates Plant 40 kgal Stirred Tank #1

Device ID #	**113824**	***Device Name***	**Silicates Plant 40 kgal Stirred Tank #1**
Rated Heat Input		*Physical Size*	40000.00 Gallons
Manufacturer		*Operator ID*	
Model		*Serial Number*	
Location Note			
Device Description	Used for proprietary wet processing of product.		

1.1.2 Silicates Plant 40 kgal Stirred Tank #2

Device ID #	**113825**	***Device Name***	**Silicates Plant 40 kgal Stirred Tank #2**
Rated Heat Input		*Physical Size*	40000.00 Gallons
Manufacturer		*Operator ID*	
Model		*Serial Number*	
Location Note			
Device Description	Used for proprietary wet processing of product.		

1.1.3 Silicates Plant 10 kgal Stirred Tank #1

Device ID #	**113828**	***Device Name***	**Silicates Plant 10 kgal Stirred Tank #1**
Rated Heat Input		*Physical Size*	10000.00 Gallons
Manufacturer		*Operator ID*	
Model		*Serial Number*	
Location Note			
Device Description	Used for proprietary wet processing of product.		

1.1.4 Silicates Plant 10 kgal Stirred Tank #2

Device ID #	**113966**	***Device Name***	**Silicates Plant 10 kgal Stirred Tank #2**
Rated Heat Input		*Physical Size*	10000.00 Gallons
Manufacturer		*Operator ID*	
Model		*Serial Number*	
Location Note			
Device Description	Used for proprietary wet processing of product.		

1.1.5 Silicates Plant Filter Press

Device ID #	**113829**	***Device Name***	**Silicates Plant Filter Press**
Rated Heat Input		*Physical Size*	800.00 Square Feet
Manufacturer		*Operator ID*	
Model		*Serial Number*	
Location Note			
Device Description	Used to filter product.		

1.1.6 Silicates Plant 10 kgal Storage Tank #1

Device ID #	**113832**	***Device Name***	**Silicates Plant 10 kgal Storage Tank #1**
Rated Heat Input		*Physical Size*	10000.00 Gallons
Manufacturer		*Operator ID*	
Model		*Serial Number*	
Location Note			
Device Description			

1.1.7 Silicates Plant 10 kgal Storage Tank #2

Device ID #	**113963**	***Device Name***	**Silicates Plant 10 kgal Storage Tank #2**
Rated Heat Input		*Physical Size*	10000.00 Gallons
Manufacturer		*Operator ID*	
Model		*Serial Number*	
Location Note			
Device Description			

1.1.8 Silicates Plant Baghouse 5DC-01

Device ID #	**114326**	***Device Name***	**Silicates Plant Baghouse 5DC-01**
Rated Heat Input		*Physical Size*	2000.00 scf/Minute
Manufacturer	MikroPul	*Operator ID*	5DC-01
Model	36S-10-30TR"B"	*Serial Number*	tbd
Location Note	Controls 40 kgal stirred tank.		
Device Description	2000 scfm maximum airflow rating. 36 bags, 3398 square feet total filtration area. Air to cloth ratio: 2.36 ft/min. MikroTex bags, 16 oz polyester with PTFE membrane. Guaranteed to 0.005 gr/dscf. Pressure Drop Range 0.5 - 6.0 in H20.		

1.2 Synthetic Silicate (Packing)

1.2.1 Silicates Packing Station

Device ID #	**103402**	***Device Name***	**Silicates Packing Station**
Rated Heat Input		*Physical Size*	24.00 Tons/Hour
Manufacturer		*Operator ID*	
Model		*Serial Number*	
Location Note			
Device Description	Packing System		

1.2.2 Silicates Packer #1

Device ID #	**113830**	***Device Name***	**Silicates Packer #1**
Rated Heat Input		*Physical Size*	1.65 Tons/Hour
Manufacturer		*Operator ID*	
Model		*Serial Number*	
Location Note			
Device Description			

1.2.3 Silicates Packer #2

Device ID #	**113831**	***Device Name***	**Silicates Packer #2**
Rated Heat Input		*Physical Size*	1.65 Tons/Hour
Manufacturer		*Operator ID*	
Model		*Serial Number*	
Location Note			
Device Description			

1.2.4 Silicate Plant Ventilation Baghouse (Pack Area)

Device ID #	**000142**	*Device Name*	**Silicate Plant Ventilation Baghouse (Pack Area)**
Rated Heat Input		*Physical Size*	42000.00 scf/Minute
Manufacturer	Mikro-Pulsaire	*Operator ID*	SPVBH
Model	Polypropylene	*Serial Number*	
Location Note			
Device Description	Ventilation packer and spillage, blow off booth, belt dryer, conveyors, AW packer, bulk packing unit; Negative pressure; Bag Diam. (in): 4.5; Bag Length (ft): 10.0; Total Cloth Area: 8588; enclosed		

B EXEMPT EQUIPMENT

1 Silicates Plant Tank

Device ID #	**113823**	*Device Name*	**Silicates Plant Tank**
Rated Heat Input		*Physical Size*	51000.00 Gallons
Manufacturer		*Operator ID*	
Model		*Serial Number*	
Part 70 Insig?	No	*District Rule Exemption:*	
Location Note			
Device Description	Permit exempt per Rule 202.V.9.a		

Santa Barbara County
Air Pollution Control District

PERMIT EVALUATION FOR PERMIT TO OPERATE 13570 AND PART 70 MINOR MODIFICATION 13570

1.0 BACKGROUND

1.1 General: Imerys mines and processes diatomaceous earth (DE) at its Lompoc Plant. Imerys operates multiple product lines each with "wet end" and "dry end" processing. Wet diatomaceous earth crude is surface mined, crushed, milled and dried and/or calcined at high temperatures. The dried product is classified into a variety of grades and bagged or bulk loaded for shipment to distributors and customers. In early 2008 System 7 was redesigned with some existing equipment removed and new equipment installed. The SCDP for System #7 has been extended several times to allow for troubleshooting, repair of equipment, and completion of compliance testing. A PTO has not yet been issued pending completion of the SCDP as currently specified in ATC12105-17. The Imerys Facility ID is 0012 and the Stationary Source ID is 1735.

On November 15, 2010, Imerys submitted an application for the installation of new wet processing equipment and two new packers for the Silicates processing line. This application was deemed incomplete on December 15, 2010 and an incompleteness response was received on March 4, 2011. Final ATC 13570 for the installation of the new Silicates Line equipment was issued on June 28, 2011. An application to modify ATC 13570 to include the addition of a new baghouse to control the wet processing equipment was received on July 25, 2011, and final ATC 13570-01 was issued on November 10, 2011.

As described in section 1.3 of this Permit Evaluation, during Source Compliance Demonstration Period (SCDP) source testing, the airflow through baghouse 5DC-01 was recorded at a level in excess of the permit limit in ATC 13570-01. As a result of this exceedance, Imerys submitted an ATC modification application to increase the maximum flow rate of this baghouse to 2000scfm. The resultant NEI emission increases are addressed in section 4.3 of this Evaluation and in Attachment C. This permit action is effectively a simultaneous ATC modification and PTO with the modification rolled directly into the PTO. This permit also serves to modify Part 70 Permit 5840-R4.

1.2 Project Description: This project includes the installation of new wet processing equipment, a baghouse to control particulate emissions from the wet processing equipment, and two new packers for the Silicates processing line. The new wet processing equipment consists of two 40,000 gallon stirred tanks, two 10,000 gallon stirred tanks, two 10,000 gallon storage tanks, one 5,100 gallon storage tank, and a filter press for wet diatomaceous earth processing. A new 2000 scfm baghouse

(5DC-01) has been installed to control emissions from the new wet processing equipment. Two new packers were installed and replaced two existing Silicates packers (included in District Dev. No. 103402). The two new packers are controlled by the existing Silicates Plant Ventilation Baghouse (District Dev. No. 142). The total permitted airflow through the Silicates Plant Ventilation Baghouse did not change as a result of these new packers, so there has been no increase in total permitted emissions from this baghouse. The new packers and new baghouse are considered new sources of emissions at the facility, and the emissions have been counted as a Net Emissions Increase (NEI) "I" term for the facility. The removal of the two existing Silicates packers would qualify for an NEI "D" term if the actual emissions due to the packers could be calculated. As no actual emissions data or equipment usage data was provided with the ATC application, no "D" term was calculated for this project.

1.3 Compliance/SCDP: The new silicates plant equipment was inspected during SCDP and no compliance issues with the terms and conditions of ATC 13570-01 were found. Source testing of baghouse 5DC-01 was conducted on March 8, 2012 in accordance with the SCDP and source testing conditions of ATC 13570-01. The results of this source test showed the baghouse to be in compliance with the PM and PM_{10} emission limits of ATC 13570-01, however, the air flow through baghouse 5DC-01 was recorded at 1,949 scfm which exceeded the originally permitted limit of 870 scfm. The maximum airflow for baghouse 5DC-01 was increased by ATC 13570-02 and the resulting PTE and NEI increase in PM and PM_{10} are reflected in the IDS and NEI tables shown in this permit.

2.0 ENGINEERING ANALYSIS

2.1 Equipment/Processes: Four stirred tanks, two liquid storage tanks, two packers, one baghouse and one filter press have been installed. The new packing system is a fully enclosed system and transfers material into the bags without any airflow through the packers. The new packers have replaced two existing packers included in District Dev. No. 103402, while four packers have remained. To ensure capture of fugitive dust, 500 scfm of ventilation air is used for each packer hood. The 1000 scfm of total airflow is ventilated to the existing Silicates Plant Ventilation Baghouse (District Dev. No. 142). The total permitted airflow from the Silicates Plant Ventilation Baghouse remains unchanged, and there is no overall increase in permitted emissions from this baghouse. A new baghouse permitted at 2000 scfm maximum airflow rate has been installed to control particulate emissions from the new wet processing equipment.

2.2 Emission Controls: The fugitive emissions from the new packers are controlled by the existing Silicates Plant Ventilation Baghouse (District Dev. No. 142). This baghouse is a Mikro-Pulsaire negative pressure baghouse equipped with 729 polypropylene bags, a total cloth area of 8588 square feet and a maximum airflow for 42,000 scfm. The fugitive emissions from the new wet processing equipment are controlled by baghouse 5DC-01. This baghouse is a Mikropul negative pressure baghouse equipped with 36 polyester bags with PTFE membranes, a total cloth area of 3398 square feet and a maximum airflow of 2000 scfm.

2.3 Emissions: Potential PM/PM_{10} emissions from the Silicates Plant Ventilation baghouse and Silicates Plant Baghouse DC5-01 are based on the maximum rated airflow. The baghouse exhaust blower air flow rating for the negative pressure Silicates Plant Ventilation baghouse is permitted at 42,000 scfm. The maximum air flow rating for the negative pressure baghouse 5DC-01 is permitted at 2000 scfm. The guaranteed outlet grain loading concentration of 0.0072 gr/dscf for the Silicates Plant ventilation baghouse and 0.005 gr/dscf for baghouse 5DC-01 and an operating schedule of 8,760 hours per year was used for emissions calculations. The general equation for particulate matter emissions is:

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

where: E = mass emission rate
EF = emission factor
Q = exhaust flow rate

The grain loading concentration is a guaranteed limit provided by the manufacturer. A copy of the vendor guarantees is located in the project file. For permitting purposes, Imerys has assumed that the PM/PM_{10} ratio is 1:1.

2.4 Reasonable Worst Case Emission Scenario: 24 hours per day and 8,760 hours per year.

2.5 Special Calculations: None.

2.6 BACT Analyses: Best Available Control Technology was not required for this project.

2.7 Enforceable Operational Limits: The permit has enforceable operating conditions that ensure the equipment is operated properly.

2.8 Monitoring Requirements: Monitoring of the equipment's operational limits are required to ensure that these are enforceable. The permitted pressure drop range is 0.5-6 inches as listed in permit condition 2. Periodic source testing of this unit is also required.

2.9 Recordkeeping and Reporting Requirements: The permit requires that the data which is monitored be recorded and reported to the District.

3.0 REEVALUATION REVIEW (not applicable)

4.0 REGULATORY REVIEW

4.1 Partial List of Applicable Rules:

Rule 201.	Permits Required
Rule 202.	Exemptions to Rule 201
Rule 205.	Standards for Granting Permits
Rule 301.	Circumvention
Rule 302.	Visible Emissions
Rule 303.	Nuisance
Rule 304.	Particulate Matter - Northern Zone
Rule 306.	Dust and Fumes - Northern Zone
Rule 801.	New Source Review
Rule 802.	Nonattainment Review
Rule 803.	Prevention of Significant Deterioration
Rule 810.	Federal Prevention of Significant Deterioration
40CFR60 Subpart OOO	Standards of Performance for Non-metallic Mineral Processing Plants

4.2 Rules Requiring Review:

4.2.1 40 CFR Part 60 {*New Source Performance Standards*}: Subpart OOO applies to nonmetallic mineral processing plant crushers, grinding mills, screening operations, bucket elevators, belt conveyors, bagging operations, storage bins and enclosed truck or rail car loading stations constructed, reconstructed or modified, as defined by the standard, after August 31, 1983. The product packer units are an integral part of a nonmetallic mineral processing plant operation and are subject to Subpart OOO. Section 60.670 (d) (1) of Subpart OOO provides an exemption from the Standards for Particulate Matter, Monitoring and Test Methods provisions for an existing facility replaced by a piece of equipment of equal or smaller size. In this case, two existing packers, rated at 4.0 ton/hour each, have been replaced by new packers rated at 1.65 ton/hr each, and therefore qualify for the Section 60.670 (d) (1) exemption. The new packers will comply with the reporting and recordkeeping requirements of Section 60.676.

The existing Silicates Plat Ventilation Baghouse is already subject to the requirements of NSPS Subpart OOO under PTO 5840-R4. The new baghouse 5DC-01 is not subject to NSPS Subpart OOO because it does not serve a crusher, grinding mill, screening operation, bucket elevator, belt conveyor, bagging operation, storage bin or enclosed truck or rail car loading station.

4.3 NEI Calculations: The net emission increase calculation is used to determine whether certain requirements must be applied to a project (e.g., offsets, AQIA, PSD BACT). The NEI values for the stationary source (the I, P1, P2 and D term of the NEI calculation) are documented in Attachment "B". The airflow increase for baghouse 5DC-01 authorized by ATC 13570-02 (which

has been rolled directly into this permit) resulted in an increase in the potential to emit, and a corresponding P1 increase to the NEI calculation. See Attachment "C" for emission increase calculations.

5.0 AQIA

The project was not subject to the Air Quality Impact Analysis requirements of Regulation VIII.

6.0 OFFSETS/ERCs

6.1 General: The emission offset thresholds of Regulation VIII is not exceeded as a result of this permit modification.

6.2 Offsets: Offsets are not required for this permitting action.

6.3 ERCs: This source does generate emission reduction credits

7.0 AIR TOXICS

An air toxics health risk assessment was not performed for this permitting action.

8.0 CEQA / LEAD AGENCY

The ATC being rolled directly into this permit is for a modification to the existing source involving negligible expansion of use. Pursuant to Section 15061(b)(3) of the California Environmental Quality Act ("CEQA") Guidelines, the proposed modifications authorized by this ATC permit are exempt from CEQA because the project does not have the potential for causing a significant effect on the environment. Further, no cross-media impacts are projected.

This permit is exempt from CEQA pursuant to the Environmental Review Guidelines for the Santa Barbara County APCD (revised November 16, 2000). Appendix A (*APCD Projects Exempt from CEQA* and *Equipment or Operations Exempt from CEQA*} provides an exemption specifically for permits to operate and reevaluations thereof. No further action is necessary.

9.0 SCHOOL NOTIFICATION

A school notice pursuant to the requirements of H&SC §42301.6 was not required.

10.0 PUBLIC and AGENCY NOTFICATION PROCESS/COMMENTS ON DRAFT PERMIT

10.1 This project was not subject to public notice.

10.2 The permittee was issued a draft permit on October 5, 2012. The permittee submitted comments on October 25, 2012. The District responses to those comments appear in Attachment D of this permit.

11.0 FEE DETERMINATION

Fees for the District's work efforts are assessed on a cost reimbursement basis. The Project Code is 205129.

12.0 RECOMMENDATION

It is recommended that this permit be granted with the conditions as specified in the permit.

David Harris	10/29/2012		10/31/12
AQ Engineer/Technician	Date	Supervisor	Date

13.0 ATTACHMENT(S)

A. IDS Tables
B. Stationary Source NEI Table
C. Emission Increase Calculations
D. Response to Comments

Permit to Operate 13570
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ATTACHMENT A
IDS Tables

PERMIT POTENTIAL TO EMIT

	NO_x	ROC	CO	SO_x	PM	PM_{10}
lb/day					2.06	2.06
lb/hr						
TPQ						
TPY					0.38	0.38

FACILITY POTENTIAL TO EMIT

	NO_x	ROC	CO	SO_x	PM	PM_{10}
lb/day	53,820.60	6,553.52	406,915.76	57,880.07	26,764.59	26,720.00
lb/hr						
TPQ						
TPY	9,218.40	1,195.62	785.74	10,517.97	4,882.75	4,874.84

FACILITY NEI90

	NO_x	ROC	CO	SO_x	PM	PM_{10}
lb/day	5.85	54.61	376.18	3.36	55.64	78.38
lb/hr						
TPQ						
TPY	1.07	9.97	67.47	0.61	7.47	12.39

Notes:
(1) Emissions in these tables are from IDS.
(2) Because of rounding, values in these tables shown as 0.00 are less than 0.005, but greater than zero.

Permit to Operate 13570
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ATTACHMENT B
Stationary Source NEI

ATTACHMENT B - Stationary Source NEI
PTO 13570
Imerys Minerals California - Lompoc Plant

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

Permit No.	Date Issued	NOx		ROC		CO		SOx		PM		PM10	
		lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
PTO 13570	TBD												
Totals		**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**

II. Stationary Source "P1s"

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

Permit No.	Date Issued	NOx		ROC		CO		SOx		PM		PM10	
		lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
PTO 5840-R2[1]	6/1/2003					145.40	25.25	3.60	0.23	10.46	4.25	12.12	2.13
A/P 11107	12/26/2003									1.90	0.33	1.90	0.33
PTO 11008	3/8/2004									6.48	1.15	1.85	0.33
PTO 11083	4/12/2004									0.55	0.03	0.55	0.03
ATC/PTO 11224	9/1/2004									16.07	2.57	16.07	2.57
PTO 11007	3/24/2005									0.59	0.10	0.59	0.10
ATC/PTO 11224-01	4/28/2006									0.48	0.08	0.48	0.08
ATC 12091	10/26/2006									16.24	2.96	16.24	2.96
ATC 12208	1/31/2007									19.84	3.62	19.84	3.62
ATC 12091-01[2]	3/26/2007									0.00	0.00	0.00	0.00
ATC 12105	6/11/2007	48.53	8.86	10.74	1.96	147.41	26.90	84.63	15.45	151.81	27.32	145.45	26.42
ATC 12208-01[3]	8/31/2007									0.00	0.00	0.00	0.00
ATC 12091-02	9/25/2007									11.31	2.06	11.31	2.06
ATC 12208-02	12/28/2007									7.16	1.31	7.16	1.31
ATC 12315	1/11/2008									33.08	1.59	16.06	0.79
ATC 12105-01	1/25/2008									57.79	10.55	57.79	10.55
ATC 12091-03	6/6/2008									2.06	0.38	2.06	0.38
PTO 12398[4]	7/8/2008									23.15	4.22	23.15	4.22
ATC-Mod 12315-03	3/9/2009										1.43		0.68
ATC-Mod 12208-03	3/9/2009									0.49	0.09	0.49	0.09
ATC-Mod 12105-09	3/1/2010									15.97	2.92	15.97	2.92
ATC-Mod 12105-11	5/12/2010	5.85	1.07	1.29	0.23	17.76	3.25	3.36	0.61	1.80	0.33	1.80	0.33
ATC 13544	10/8/2010									0.36	0.07	0.36	0.07
ATC/PTO 13675	5/10/2011	47.22	4.25	7.08	0.64	97.06	8.74	17.97	1.62	9.84	0.89	9.84	0.89
ATC 13570-01	11/10/2011									2.38	0.43	2.38	0.43
ATC 12105-17	9/14/2012			50.83	9.28	272.76	49.78			17.78	3.24	17.78	3.24
ATC 13570-02	TBD									1.16	0.21	1.16	0.21
Totals		**101.60**	**14.18**	**69.95**	**12.11**	**680.39**	**113.91**	**109.56**	**17.91**	**408.74**	**72.12**	**382.39**	**66.73**

Notes:

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

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ATTACHMENT B
Stationary Source NEI

III. Stationary Source "P2" NEI-90 Decreases

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

Permit No.	Date Issued	NOx		ROC		CO		SOx		PM		PM10	
		lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
PTO 11083	4/12/2004									0.24	0.03	0.24	0.03
ATC 12105-01	1/25/2008	28.06	5.12	6.21	1.13	85.25	15.56	12.68	2.32	80.84	14.75	80.84	14.75
PTO-Mod 5840-07	3/1/2010									38.28	6.64	14.27	2.39
ATC 12105-14	2/16/2011									13.25	2.42	13.25	2.42
ATC/PTO 13675	5/10/2011	47.22	4.25	7.08	0.64	97.06	8.74	17.97	1.62	9.84	0.89	9.84	0.89
ATC 12398-02	7/10/2012									9.52	1.74	9.52	1.74
Totals		**75.28**	**9.37**	**13.29**	**1.77**	**182.31**	**24.30**	**30.65**	**3.94**	**151.97**	**26.47**	**127.96**	**22.21**

IV. Stationary Source Pre-90 "D" Decreases

Enter all stationary source "D" decreases below:

Permit No.	Date Issued	NOx		ROC		CO		SOx		PM		PM10	
		lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
ATC 12105-01[1,2]	1/25/2008	20.47	3.74	2.04	0.37	121.90	22.15	75.55	13.36	201.13	38.18	176.05	32.13
Totals		**20.47**	**3.74**	**2.04**	**0.37**	**121.90**	**22.15**	**75.55**	**13.36**	**201.13**	**38.18**	**176.05**	**32.13**

Notes: 1. "D"-Term values in table above excludes reductions which are subject to DOI 047 ERC application (see table below).
This is necessary so that NEI remains non-negative per Rule 801

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

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

V. Calculated Stationary Source NEI-90

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

Term	NOx		ROC		CO		SOx		PM		PM10	
	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
I	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
P1	101.60	14.18	69.95	12.11	680.39	113.91	109.56	17.91	408.74	72.12	382.39	66.73
P2	75.28	9.37	13.29	1.77	182.31	24.30	30.65	3.94	151.97	26.47	127.96	22.21
D	20.47	3.74	2.04	0.37	121.90	22.15	75.55	13.36	201.13	38.18	176.05	32.13
NEI-90	**5.85**	**1.07**	**54.61**	**9.97**	**376.18**	**67.47**	**3.36**	**0.61**	**55.64**	**7.47**	**78.38**	**12.39**

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

Permit to Operate 13570
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ATTACHMENT C
Emissions Increase Calculations

Attachment C - Net Emission Increase Calculations
ATC 13570-02
Imerys Minerals California - Lompoc Plant

Equipment Description		PM				PM10			
Equipment Item	District DeviceNo	lb/day previous	lb/day revised	ton/yr previous	ton/yr revised	lb/day previous	lb/day revised	ton/yr previous	ton/yr revised
Baghouse 5DC-01	109866	0.89	2.06	0.16	0.38	0.89	2.06	0.16	0.38
Total Emission Increases		**1.16 lb/day**		**0.21 ton/yr**		**1.16 lb/day**		**0.21 ton/yr**	

Permit to Operate 13570
and Part 70 Minor Modification 13570

ATTACHMENT D
Response to Comments

The following are the District responses to comments on the draft permit by Imerys Minerals California in a letter dated October 25, 2012:

1. Imerys Comment:
   Page 10, Condition 9.C.3.c. Imerys notes that the condition referencing the pressure drop range is Condition 9.C.2.e (not C.2.c as listed).

   District Response:
   Condition 9.C.3(c) was revised to reference the correct condition in the final permit.

2. Imerys Comment:
   Equipment List, Page 5, Item 1.2.4. Imerys requests that the equipment size be revised to 42,000 scfm, as referenced in this permit's Permit Evaluation as well as PTO 5840, Table 5.1

   District Response:
   The Silicate Plant Ventilation Baghouse (District Dev. No. 142) was corrected to reflect its permitted airflow rate of 42,000 scfm in the Permit Equipment List.

3. Imerys Comment:
   Attachment B, Stationary Source NEI Table. Please confirm P1 values; Imerys calculates the P1 term from the increase from 870 scfm to 2000 scfm to be 1.162 lb/day and 0.212 ton/year PM/PM10.

   District Response:
   The NEI P1-term presented in the draft permit was incorrect due to rounding errors. The net emissions increase calculations have been corrected in the final permit, and agree with Imerys' calculated values.

Santa Barbara County
Air Pollution Control District

NOV 0 1 2012

Certified Mail 7011 3500 0002 7298 4153
Return Receipt Requested

Sara Wallon
Imerys Minerals California, Inc.
2500 Miguelito Road
Lompoc, CA 93436

FID: 00012
Permit: P 13570
SSID: 01735

Re: Final Permit to Operate 13570

Dear Ms. Wallon:

Enclosed is the final Permit to Operate (PTO) No. 13570 for wet processing equipment, packers and a baghouse for the Silicates processing line at 2500 Miguelito Road in Lompoc.

Please carefully review the enclosed documents to ensure that they accurately describe your facility and that the conditions are acceptable to you. Note that your permitted emission limits may, in the future, be used to determine emission fees.

You should become familiar with all District rules pertaining to your facility. This permit does not relieve you of any requirements to obtain authority or permits from other governmental agencies.

This permit requires you to:

- Follow the conditions listed on your permit. Pay careful attention to the recordkeeping and reporting requirements.
- Ensure that a copy of the enclosed permit is posted or kept readily available near the permitted equipment.
- Promptly report changes in ownership, operator, or your mailing address to the District.

If you are not satisfied with the conditions of this permit, **you have thirty (30) days from the date of this issuance to appeal this permit to the Air Pollution Control District Hearing Board** (ref: California Health and Safety Code, §42302.1). Any contact with District staff to discuss the terms of this permit will not stop or alter the 30-day appeal period.

Please include the facility identification (FID) and permit numbers as shown at the top of this letter on all correspondence regarding this permit. If you have any questions, please contact David Harris of my staff at (805) 961-8824.

Sincerely,

Michael Goldman, Manager
Engineering & Compliance Division

enc: Final PTO 13570
Final Permit Evaluation
Air Toxics "Hot Spots" Fact Sheet District Form 12B

cc: Imerys Minerals California, Inc. 00012 Project File
ECD Chron File
Ben Ellenberger (Cover letter only)
David Harris (Cover letter only)
Ms. Felicia Kaminsky, M.F. Strange & Associates

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