



**San Joaquin Valley**  
AIR POLLUTION CONTROL DISTRICT

JUL 28 2010

Michael Iles  
Corn Products International  
P.O. Box 6129  
Stockton, CA 95206-0129

**Re: Notice of Preliminary Decision - Title V Permit Renewal  
District Facility # N-238  
Project # N-1083751**

Dear Mr. Iles:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Corn Products International for its grain milling and processing facility located at 1021 Industrial Drive in Stockton, 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 underline.

David Warner  
Director of Permit Services

**Attachments**

C: Jerry Sandhu, Permit Services Engineer

**Seyed Sadredin**

Executive Director/Air Pollution Control Officer

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**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  
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[www.valleyair.org](http://www.valleyair.org)

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



**San Joaquin Valley**  
AIR POLLUTION CONTROL DISTRICT

JUL 28 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 # N-238  
Project # N-1083751**

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 Corn Products International for its grain milling and processing facility located at 1021 Industrial Drive in Stockton, 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,

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Director of Permit Services

**Attachments**

C: Jerry Sandhu, Permit Services Engineer

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**San Joaquin Valley**  
**AIR POLLUTION CONTROL DISTRICT**

JUL 28 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 # N-238  
Project # N-1083751**

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 Corn Products International for its grain milling and processing facility located at 1021 Industrial Drive in Stockton, 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,

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David Warner  
Director of Permit Services

**Attachments**

C: Jerry Sandhu, Permit Services Engineer

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Stockton Record

**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 Corn Products International for its grain milling and processing facility located at 1021 Industrial Drive in Stockton, California.

The District's analysis of the legal and factual basis for this proposed action, project #N-1083751, is available for public inspection at [http://www.valleyair.org/notices/public\\_notices\\_idx.htm](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**

**Proposed Title V Permit Renewal Evaluation  
Corn Products International  
N-238**

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**TITLE V PERMIT RENEWAL EVALUATION**  
**Grain Milling and Processing**

**Engineer:** Jerry Sandhu  
**Date:** July 23, 2010

**Facility Number:** N-238  
**Facility Name:** Corn Products International  
**Mailing Address:** P O Box 6129  
Stockton, CA 95206-0129

**Contact Name:** Michael Iles  
**Phone:** (209) 982-1920 ext. 222

**Responsible Official:** Michael Iles  
**Title:** Plant Manager

**Project # :** N-1083751  
**Deemed Complete:** November 3, 2008

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**I. PROPOSAL**

Corn Products International was issued a Title V permit on November 30, 2004. 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**

Corn Products International is located at 1021 Industrial Drive in Stockton, CA.

### 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 does not propose to use any model general permit templates.

### 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 September 21, 2006 ⇒ amended December 20, 2007)
- District Rule 2201, New and Modified Stationary Source Review Rule  
(amended December 18, 2008)
- District Rule 4101, Visible Emissions  
(amended November 15, 2001 ⇒ amended February 17, 2005)
- District Rule 4601, Architectural Coatings  
(amended October 31, 2001 ⇒ amended December 17, 2009)
- District Rule 4703, Stationary Gas Turbines  
(amended August 17, 2006 ⇒ amended September 20, 2007)
- District Rule 8011, General Requirements  
(adopted November 15, 2001 ⇒ amended August 19, 2004)

- District Rule 8021, Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities  
(adopted November 15, 2001 ⇒ amended August 19, 2004)
- District Rule 8031, Bulk Materials  
(adopted November 15, 2001 ⇒ amended August 19, 2004)
- District Rule 8041, Carryout and Trackout  
(adopted November 15, 2001 ⇒ amended August 19, 2004)
- District Rule 8051, Open Areas  
(adopted November 15, 2001 ⇒ amended August 19, 2004)
- District Rule 8061, Paved and Unpaved Roads  
(adopted November 15, 2001 ⇒ amended August 19, 2004)
- District Rule 8071, Unpaved Vehicle/Equipment Traffic Areas  
(adopted November 15, 2001 ⇒ amended September 16, 2004)
- 40 CFR Part 60, Subpart GG, Standards of Performance for Stationary Gas Turbines  
(amended February 24, 2006)
- 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos  
(amended July 20, 2004)
- 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners  
(amended June 18, 2008)
- 40 CFR Part 82, Subpart F, Recycling and Emissions Reduction  
(amended June 18, 2008)
- 40 CFR Part 64, Compliance Assurance Monitoring (CAM)

## **B. Rules Removed**

No rules have been removed.

## **C. Rules Added**

- District Rule 4309, Dryers, Dehydrators, and Ovens  
(adopted December 15, 2005)

#### **D. Rules Not Updated**

- District Rule 1081, Source Sampling  
(amended December 16, 1993)
- District Rule 2010, Permits Required  
(amended December 17, 1992)
- District Rule 2031, Transfer of Permits  
(amended December 17, 1992)
- District Rule 2070, Standards for Granting Applications  
(amended December 17, 1992)
- District Rule 2080, Conditional Approval  
(amended December 17, 1992)
- District Rule 2520, Federally Mandated Operating Permits  
(amended June 21, 2001)
- District Rule 4201, Particulate Matter Concentration  
(amended December 17, 1992)
- District Rule 4202, Particulate Matter - Emission Rate  
(amended December 17, 1992)

### **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 Added**

No rules have been added.

## **B. Rules Not Updated**

- District Rule 1070, Inspections  
(amended December 17, 1992)
- District Rule 1100, Equipment Breakdown  
(amended December 17, 1992)
- District Rule 1160, Emission Statements  
(adopted November 18, 1992)
- District Rule 2040, Applications  
(amended December 17, 1992)
- District Rule 4102, Nuisance  
(as amended December 17, 1992)
- District Rule 4801, Sulfur Compounds  
(amended December 17, 1992)

## **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 2020 - Exemptions**

District Rule 2020 lists equipment, which are specifically exempt from obtaining permits, and specifies recordkeeping requirements to verify such exemptions. The rule was amended in December 20, 2007. The amendments to this rule do not have any affect on current permit requirements and will therefore not be addressed in this evaluation.

Condition 4 of permit -0-2 ensures compliance.

### **B. District Rule 2201 - New and Modified Stationary Source Review Rule**

District Rule 2201 was amended on September 21, 2006, after this facility's Title V permit was last renewed. This Title V permit renewal does not constitute a modification per section 3.25, 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 at this time.

#### **C. District Rule 4101 - Visible Emissions**

The provisions of this rule shall apply to any source operation which emits or may emit air contaminants.

Section 5.0 prohibits the discharge into the atmosphere from any single source of emission whatsoever, any air contaminant, other than uncombined water vapor, for a period or periods aggregating more than three minutes in any one hour which is as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines, or 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 permit -0-2 ensures compliance.

#### **D. District Rule 4309 - Dryers, Dehydrators, and Ovens**

The purpose of this rule is to limit emissions of oxides of nitrogen (NO<sub>x</sub>) and carbon monoxide (CO) from dryers, dehydrators, and ovens. This rule applies to any dryer, dehydrator, or oven that is fired on gaseous fuel, liquid fuel, or is fired on gaseous and liquid fuel sequentially, and the total rated heat input for the unit is 5.0 million British thermal units per hour (5.0 MMBtu/hr) or greater.

The facility has three dryers: N-238-10, -13, and -33. Unit -10 is fired on natural gas, and the dried product comes in direct contact with the

combusted gas. Units -13 and -33 are steam tube dryers with no products of combustion.

Section 3.10 defines a dryer as any device in which material is dried or cured in direct contact with the products of combustion. Therefore, only unit N-238-10 is subject to District Rule 4309.

N-238-10: Natural Gas-Fired Dryer

Table 1 in Section 5.2 specifies NO<sub>x</sub> and CO emissions limits.

Table 1 – NO <sub>x</sub> and CO Limits for Rule 4309 (Referenced @ 19% O <sub>2</sub> )				
Process Description	NO <sub>x</sub> Limit (ppmv)		CO Limit (ppmv)	
	Gaseous Fuel Fired	Liquid Fuel Fired	Gaseous Fuel Fired	Liquid Fuel Fired
Asphalt/Concrete Plants	4.3	12.0	42	64
Milk, Cheese, and Dairy Processing < 20 MMBtu/hr	3.5	3.5	42	42
Milk, Cheese, and Dairy Processing ≥ 20 MMBtu/hr	5.3	5.3	42	42
Other processes not described above	4.3	4.3	42	42

The starch dryer falls under the “Other processes not described above” category. The NO<sub>x</sub> and CO emissions limits for this dryer do not exceed the maximum allowable emissions limits specified above.

Conditions 4 and 5 of permit -10-7 ensure compliance.

Section 5.3 states that the emission limits in Section 5.2 shall not apply during start-up or shutdown periods provided an operator complies with specified requirements. The dryer is not subject to start-up and shutdown provisions and subsequently does not have relaxed emission limits during such periods. Therefore this section is not applicable.

Section 5.4 requires the operators of dryers and ovens subject to the emissions limits specified in Section 5.2 to install continuous emissions monitoring or an alternate monitoring system approved by the APCO. The dryer is using an APCO approved alternate monitoring system.

Conditions 26-29 of permit -10-7 ensure compliance.

Section 5.5.1 states that all emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate.

Condition 18 of permit -10-7 ensures compliance.

Section 5.5.2 states that except as provided in Section 5.5.3, no determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition.

Condition 18 of permit -10-7 ensures compliance.

Section 5.5.3 states that notwithstanding the requirements of Section 5.5.2, the APCO, ARB, and US EPA may approve a longer or shorter period before compliance determination, if an operator submits an application for a Permit to Operate condition which provides justification for the requested duration. The facility has not requested a longer or shorter period of compliance determination for the dryer as specified in Section 5.5.2. Therefore this section is not applicable.

Section 5.5.4 pertains to units equipped with continuous emissions monitoring systems. The dryer is not equipped with continuous emissions monitoring systems. Therefore this section is not applicable.

Section 5.5.5 states that emission readings of NO<sub>x</sub> exhaust concentrations shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15-consecutive-minute sample reading or by taking at least five readings evenly space out over the 15-consecutive-minute period.

Condition 28 of permit -10-7 ensures compliance.

Section 5.5.6 states that for emissions source testing pursuant to Section 6.3.1 to determine compliance with an applicable emissions limit of this rule, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of the three runs individually demonstrate emissions above the applicable limit, the test cannot be used to demonstrate compliance for the unit, even if the averaged emissions of all three test runs is less than the applicable limit.

Condition 20 of permit -10-7 ensures compliance.

Section 6.1.1 lists the recordkeeping requirements for a unit that uses a continuous emissions monitoring system. The dryer does not use a

continuous emissions monitoring system. Therefore this section is not applicable.

Section 6.1.2 states that operators using an alternate emissions monitoring system shall maintain the following records on a periodic basis:

- Total hours of operation.
- Type and quantity of fuel used during operations.
- Measurement for each surrogate parameter.
- Range of allowed values for each surrogate parameter.
- The period for recordkeeping shall be specified in the PTO conditions.

The facility's APCO approved alternate monitoring plan does not require monitoring of surrogate parameters.

Compliance with the hours of operation and fuel usage recordkeeping requirements are assured with condition 31 of permit -10-7.

Section 6.1.3 only applies to dehydrators. Therefore this section is not applicable to the dryers.

Section 6.1.4 states that the operator of a unit subject to Section 5.2 and performing start-up or shutdown of that unit shall keep records of the duration of each start-up and each shutdown. The facility has not proposed start-up or shutdown periods for the dryer. Therefore this section is not applicable.

Section 6.1.5 lists the recordkeeping requirements for an operator of any unit operated under the exemption of Section 4.3. The dryer does not operate under the exemption in Section 4.3. Therefore the requirements in this section do not apply.

Section 6.1.6 states the records and manufacturer's specifications required by Sections 6.1.1 through 6.1.5 shall meet all of the following requirements.

- The records shall be maintained for five (5) calendar years,
- The records shall be made available on-site during normal business hours, and
- The records shall be submitted to the APCO upon request.

Conditions 31 and 38 of permit -10-7 ensure compliance.

Section 6.2 identifies the following test methods as District-approved source testing methods for the pollutants listed:

<b>Pollutant</b>	<b>Units</b>	<b>Test Method Required</b>
NO <sub>x</sub>	ppmv	EPA Method 7E or ARB Method 100
CO	ppmv	EPA Method 10 or ARB Method 100
Stack Gas O <sub>2</sub>	%	EPA Method 3 or 3A, or ARB Method 100
Stack Gas Velocities	ft/min	EPA Method 2
Stack Gas Moisture Content	%	EPA Method 4

Conditions 21-23 of permit -10-7 ensure compliance.

Section 6.3.1 applies to dehydrators. There are no dehydrators at the facility. Therefore, this section is not applicable.

Section 6.3.2 states that after initial source testing, each unit subject to Section 5.2 emission limits shall be source tested at least once every 24 months.

Condition 19 of permit -10-7 ensures compliance.

Section 6.3.3 states source testing requirements for units that operate less than 50 days per calendar year. The dryer operates more than 50 days per calendar year. Therefore this section is not applicable.

Section 6.3.4 states that each exhaust stack of a unit subject to the requirements of Section 4.3 or 5.2 shall be source-tested to demonstrate compliance with the applicable emission limits.

Condition 19 of permit -10-7 ensures compliance.

Section 6.3.5 states the APCO shall be notified according to the provisions of Rule 1081 (Source Sampling).

Conditions 24-25 of permit -10-7 ensure compliance.

Section 6.3.6 states that emissions source testing shall be conducted with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate.

Condition 18 of permit -10-7 ensures compliance.

Section 6.3.7 states that all test results for NOx and CO shall be reported in ppmv, corrected to dry stack conditions and adjusted using the oxygen correction factor.

Condition 30 of permit -10-7 ensures compliance.

Section 6.3.8 states that for the purpose of determining compliance with an applicable emission limit, the arithmetic average of three 30-consecutive-minute test runs shall apply.

Condition 20 of permit -10-7 ensures compliance.

Section 6.3.9 states that if two of the three runs specified by Section 6.3.8 individually demonstrate emissions above the applicable limit, the test cannot be used to demonstrate compliance for the unit, even if the averaged emissions of all three runs is less than the applicable limit.

Condition 20 of permit -10-7 ensures compliance.

Section 6.4 lists the source testing requirements for asphalt/concrete plants. Since this facility is not an asphalt or concrete plant, the requirements of this section do not apply.

Section 7.1 lists the dates that dryers are required to be in compliance with Rule 4309. The dryer at this facility is required to be in compliance with Rule 4309 by December 1, 2008. As demonstrated in the above rule analysis, the dryer at the facility is in compliance with Rule 4309.

#### **E. 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. See conditions 23, 24, 25, and 40 on facility-wide permit N-238-0-2 which ensure compliance with Rule 4601 requirements.

The latest version of District Rule 4601 has not been SIP approved. Attachment C 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.

**F. District Rule 4703 – Stationary Gas Turbines**

The facility has one unit subject to this rule: N-238-18.

**N-238-18: 2800 kW Gas Turbine and Waste Heat Boiler**

The purpose of this rule is to limit NO<sub>x</sub> emissions from stationary gas turbine systems. The provisions of this rule apply to all stationary gas turbine systems, which are subject to District permitting requirements, and with ratings equal to or greater than 0.3 megawatt (MW) and/or a maximum heat input rating of more than 3,000,000 Btu per hour, except as provided in Section 4.0. This permit unit is subject to this rule since its rated capacity is 2.8 MW.

Section 5.1 requires that NO<sub>x</sub> emissions concentrations measured for compliance with Section 5.0 be averaged over a three hour period, using consecutive 15-minute sampling periods in accordance with either the applicable test method in Section 6.4, or, if continuous emission monitors are used, all applicable requirements of 40 CFR Part 60, as detailed in Section 6.2. Any variations from these measurement requirements are subject to APCO and EPA approval prior to implementation.

Section 5.1.1 specifies the Tier 1 NO<sub>x</sub> compliance limits. As discussed below, the stationary gas turbine operates in compliance with the Tier 2 NO<sub>x</sub> emission limits specified in section 5.1.2. The Tier 2 NO<sub>x</sub> emission limits are more stringent than the Tier 1 NO<sub>x</sub> emissions limits. Therefore, compliance with the Tier 1 NO<sub>x</sub> emission limits will be demonstrated with compliance of the Tier 2 NO<sub>x</sub> emission limits and no further discussion is required.

Section 5.1.2 specifies the Tier 2 NO<sub>x</sub> compliance limits for all stationary gas turbines, and states that the owner or operator of any stationary gas turbine system shall not operate such unit under load conditions, except as allowed by Section 5.3, which results in the measured emissions concentration exceeding the applicable emissions limits shown in Table 5-2 of Rule 4703, according to the Tier 2 Compliance Schedules listed in Section 7.2.

<b>Table 5-2: Rule 4703 Tier 2 NO<sub>x</sub> Compliance Limits</b>			
<b>Turbine Rating (MW)</b>	<b>Compliance Option</b>	<b>NO<sub>x</sub> Compliance Limit, ppmvd at 15% O<sub>2</sub></b>	
		<b>Gas Fuel</b>	<b>Liquid Fuel</b>
a) Less than 2.0 Solar Saturn, driving a centrifugal compressor	Standard	50	50
b) No greater than 10 MW, if a DLN System is commercially available for the specific unit, as of April 30, 2003	Standard	25	65
c) No greater than 10 MW, if a DLN System is not commercially available for the specific unit, as of April 30, 2003	Standard	35	65
d) Greater than 10 MW, Combined Cycle.	Standard	5	25
	Enhanced	3	25
e) Greater than 10 MW, Simple cycle, and permit conditions for greater than 877 hrs/yr operation.	Standard	5	25
	Enhanced	3	25
f) Greater than 10 MW, Simple cycle, and permit conditions for no greater than 877 hrs/yr operation.	Standard	25	42
	Enhanced	5	25

This gas-fired unit is subject to Category C of Table 5-2. Additionally, Table 7.1 of Rule 4703 sets a compliance deadline date of April 30, 2003.

Compliance with the NO<sub>x</sub> emissions limits is satisfied by Conditions 8 and 34 on the proposed permit. Condition 26 of the current permit, which listed Tier 1 requirements and is less stringent, has been removed.

Section 5.1.3 specifies Tier 3 NO<sub>x</sub> compliance limits, and states that the owner or operator of any stationary gas turbine system listed in Table 5-3 of Rule 4703 shall not operate such unit under load conditions, except as allowed by Section 5.3, which results in the measured emissions concentration exceeding the applicable emission limits in Table 5-3, according to the Tier 3 Compliance Schedule listed in Section 7.3. Section 7.3 states that operators with no more than two units subject to Section 5.1.3 on September 20, 2007 shall demonstrate and maintain compliance by the earlier of either of the following dates:

- October 1, 2011, or
- Within 90 days following the next Major Overhaul on or after July 1, 2009.

The next Major Overhaul for this unit is scheduled for the end of 2010 or early 2011. Therefore, the unit is not yet subject to the requirements of Section 5.1.3 and no further discussion is required.

Section 5.2 requires that the owner or operator of any stationary gas turbine system shall not operate such unit under load conditions, except as allowed by Section 5.3, which results in the measured CO emissions concentration exceeding the compliance limits listed below:

<b>Rule 4703 Gas Turbine CO Emission Limit</b>	
<b>Stationary Gas Turbine</b>	<b>CO Emission Limit (ppmv @ 15% O<sub>2</sub>)</b>
Units not identified below	200
General Electric Frame 7	25
General Electric Frame 7 with Quiet Combustors	52
< 2.0 MW Solar Saturn gas turbine powering a centrifugal compressor	250

This permit is subject to "Units not identified below." Compliance with the CO emission limit is satisfied by Condition 9 on the proposed permit.

Section 5.3 requires that on and after the date a unit is required, pursuant to Section 7.0, to be in compliance with the emission limits requirements of Section 5.1 or Section 5.2, the applicable emission limits of Sections 5.1 and 5.2 shall not apply during a transitional operation period (bypass transition period, primary re-ignition period, reduced load period, startup or shutdown) provided an operator complies with the requirements specified below:

- The duration of each startup or each shutdown shall not exceed two hours, except as provided in section 5.3.3 below.
- For each bypass transition period, the requirements specified in Section 3.2 shall be met.
- For each primary re-ignition period, the requirements specified in Section 3.20 shall be met.
- Each reduced load period shall not exceed one hour.
- The emission control system shall be in operation and emissions shall be minimized insofar as technologically feasible during each transitional operation period.

- An operator may submit an application to allow more than two hours for each startup or each shutdown or more than one hour for each reduced load period provided the operator meets all of the conditions specified in the rule.

Compliance is satisfied by Conditions 24 through 29 on the proposed permit.

Section 6.1 states that the owner or operator of any existing stationary gas turbine system shall submit to the APCO an emissions control plan of all actions, including a schedule of increments of progress, which will be taken to comply with the requirements of the applicable NO<sub>x</sub> Compliance Limit in Section 5.0 and Compliance Schedule in Section 7.0.

The facility submitted an emission control plan for this unit on January 8, 2009 to satisfy Tier 3 emissions requirements. Therefore, this requirement has already been satisfied and no further discussion is required. Since there are no additional compliance deadlines for which an emissions control plan is required, condition 36 on the current permit has been removed.

Section 6.2.1 states that except for units subject to Section 6.2.3, for turbines with exhaust gas NO<sub>x</sub> control devices, the owner or operator shall either install, operate, and maintain continuous emissions monitoring equipment for NO<sub>x</sub> and oxygen, as identified in Rule 1080 (Stack Monitoring), or install and maintain APCO-approved alternate monitoring. This unit does not have an exhaust gas control device. Therefore, this section does not apply.

Section 6.2.2 requires that except for units subject to Section 6.2.3, for turbines without exhaust-gas NO<sub>x</sub> control devices and without continuous emissions monitoring equipment, the owner or operator shall monitor operational characteristics recommended by the turbine manufacturer or emission control system supplier, and approved by the APCO.

Section 6.2.3 applies to units greater than 10 MW. Therefore, this section does not apply and the unit is instead subject to Section 6.2.2. Compliance with Section 6.2.2 is assured with unit-specific Conditions 4 through 7 on the proposed permit.

Section 6.2.4 requires that the owner or operator shall maintain all records for a period of five years from the date of data entry and shall make such records available to the APCO upon request. Condition 43 of the proposed permit ensures compliance.

Section 6.2.5 requires that the owner or operator shall submit to the APCO, before issuance of the Permit to Operate, information correlating the control

system operating parameters to the associated measured NO<sub>x</sub> output. This information may be used by the APCO to determine compliance when there is no continuous emission monitoring system for NO<sub>x</sub> available or when the continuous emission monitoring system is not operating properly. This is a startup requirement for which compliance has already been assured. No additional conditions are required.

Section 6.2.6 requires that the owner or operator shall maintain a stationary gas turbine system operating log that includes, on a daily basis, the actual local time start-up and stop time, length and reason for reduced load periods, total hours of operation, type and quantity of fuel used (liquid/gas). Condition 41 of the proposed permit ensures compliance.

Section 6.2.7 requires that the owner or operator shall maintain a stationary gas turbine system operating log for units exempt under Section 4.2 that includes, on a daily basis, the actual local start-up time and stop time, total hours of operation, and cumulative hours of operation to date for the calendar year. This unit is not exempt under Section 4.2. Therefore, this section is not applicable.

Section 6.2.8 requires that the operator performing start-up or shutdown of a unit shall keep records of the duration of start-up or shutdown. Condition 41 of the proposed permit ensures compliance.

Section 6.3.1 requires annual source testing for exhaust gas NO<sub>x</sub> and CO concentrations. Condition 10 of the proposed permit ensures compliance.

Section 6.3.2 requires biennial source testing for gas turbine systems operating less than 877 hours per year. This permit unit operates more than 877 hours per year, and is therefore not applicable to this requirement.

Section 6.3.3 requires that the owner or operator of any unit with an intermittently operated auxiliary burner shall demonstrate compliance with the auxiliary burner both on and off. This unit does not have an auxiliary burner. Therefore, this section does not apply. Condition 38 of the current permit has been removed since it is not applicable.

Sections 6.4.1 through 6.4.3 requires that the following test measures shall be used unless otherwise approved by the APCO and EPA.

- Oxides of nitrogen emissions for compliance tests shall be determined by using EPA Method 7E or EPA Method 20.
- Carbon monoxide emissions for compliance tests shall be determined by using EPA Test Methods 10 or 10B.

- Oxygen content of the exhaust gas shall be determined by using EPA Methods 3, 3A, or 20.

Conditions 32 and 34 of the proposed permit ensure compliance.

Sections 6.4.4 and 6.4.5 list the test methods for determining the HHV and LHV of fuels. Since the permit unit is already in compliance with Tier 2 limits, and HHV or LHV is only required for Tier 1 emission limits, HHV and LHV measurements are not required.

Section 6.5 applies only to exempt and emergency standby units. This unit does not fall under either category. Therefore, this section does not apply.

Section 7.0 lists the compliance schedule for stationary gas turbines. As previously discussed in Section 5.1 above, the unit already complies with Tier 2 NO<sub>x</sub> requirements and is not yet required to meet Tier 3 requirements. No further discussion is required.

#### **G. District Rule 8011 - General Requirements**

The purpose of Regulation VIII (Fugitive PM<sub>10</sub> Prohibitions) is to reduce ambient concentrations of fine particulate matter (PM<sub>10</sub>) by requiring actions to prevent, reduce or mitigate anthropogenic fugitive dust emissions. The provisions of this rule are applicable to specified outdoor fugitive dust sources.

Conditions 29 through 34 of permit -0-2 ensure compliance with the requirements of Rule 8011.

#### **H. 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.

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.

Compliance with the provisions of this rule is ensured by condition 29 of permit -0-2.

**I. 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.

Compliance with the provisions of this rule is ensured by condition 30 of permit -0-2.

**J. 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. 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.

Compliance with the provisions of this rule is ensured by condition 31 of permit -0-2.

**K. 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.

Compliance with the provisions of this rule is ensured by condition 32 of permit -0-2.

**L. 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.

Compliance with the provisions of this rule is ensured by condition 33 of permit -0-2.

**M. 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.

Compliance with the provisions of this rule is ensured by condition 34 of permit -0-2.

**N. 40 CFR Part 60, Subpart GG, Standards of Performance for Stationary Gas Turbines**

40 CFR Part 60 Subpart GG applies to all stationary gas turbines with a heat input greater than 10.7 gigajoules per hour (10.2 MMBtu/hr), that commence construction, modification or reconstruction after 10/03/77. Therefore, this subpart applies to the gas turbine, unit N-238-18.

NO<sub>x</sub> requirement from 60.332

Section 60.332(c) requires that a stationary gas turbine with a heat input rate greater than 10 MMBtu/hr but less than or equal to 100 MMBtu/hr shall comply with the NO<sub>x</sub> emission limit calculated using the following equation:

$$STD = 0.0150 \frac{(14.4)}{Y} + F ; \text{ where}$$

STD = allowable ISO corrected NO<sub>x</sub> emission concentration in % by volume @ 15% O<sub>2</sub> on dry basis

Y = Manufacturer's rated heat rate at manufacturer's rated load (kJ/w-hr) or, actual measured heat rate based on lower heating value of fuel as measured at actual peak load for the facility. The Y shall not exceed 14.4 kJ/w-hr.

F = NO<sub>x</sub> emission allowance for fuel-bound nitrogen.

For this gas turbine unit,

Heat input rate = 14,594 Btu/kW-hr (per turbine manufacturer)

$$Y = \left( 14,594 \frac{Btu}{kW - hr} \right) \times \left( \frac{1 \text{ kJ}}{0.9478 \text{ Btu}} \right) \times \left( \frac{1 \text{ kW}}{1,000 \text{ w}} \right) = 15.4 \frac{\text{kJ}}{\text{w} - \text{hr}}$$

Since Y exceeds 14.4 kJ/w-hr, Y is set equal to 14.4 kJ/w-hr.

F = 0; for conservative calculations

$$STD = 0.0150 \frac{(14.4)}{14.4} + 0 = 0.015 \% \text{ by volume @ } 15\% \text{ O}_2 \text{ (150 ppmv @ } 15\% \text{ O}_2)$$

The unit is required to achieve NO<sub>x</sub> emissions of 35 ppmv @ 15% O<sub>2</sub>, which is significantly lower than the NO<sub>x</sub> emissions limit of Section 60.332(c). Condition 8 on the proposed permit ensures compliance.

Condition 26 of the current permit, which is less stringent, has been removed.

SO<sub>x</sub> requirement from 60.333(a)

Section 60.333 (a) prohibits the discharge of any gases, which contain sulfur dioxide in excess of 0.015 percent by volume at 15 percent oxygen and on a dry basis.

Previous District-issued Title V permits have generally used a sulfur content of 5 gr/100 scf of gas, as limited by General Order 58-B of the PUC which is equivalent to 0.017% by weight. But natural gas suppliers in California (PG&E, SOCal Gas, etc) regulate the quality of the gas as following:

- Pacific Gas & Electric (PG&E) has a transportation agreement to deliver gas with a maximum total sulfur content of 1.0 gr/100 scf (actual: 0.3 to 0.5 gr/100 scf, based on source testing).
- Southern California Edison's (SoCal Gas) Standard Specifications for Natural Gas and Substitute Fuel Gases (from SoCal Gas Company Procedures, 12/26/85) has a recommended total sulfur limit of 0.75 gr/100 scf.
- Mojave Gas Company's FERC Gas Tariff General Terms and Conditions (12/30/91) requires delivered natural gas to contain no more than 0.75 gr/100 scf total sulfur.

The California Air Resource Board (ARB), in their document Guidance for Power Plant Siting (Stationary Source Div., 6/99), also determined that 1.0 gr S/100 scf is the sulfur content of gas supplied by a utility regulated by the Public Utilities Commission (PUC).

All natural gas that is regulated enters the PUC pipeline for distribution to consumers and is tested to assure that its composition conforms to above standards. Therefore, total sulfur content of 1.0 gr/100 scf is consistent with quality of gas supplied by the utilities.

Compliance is expected as shown by the following calculations at 1 grain of total sulfur per 100 standard cubic feet of gas, assuming all sulfur is converted to SO<sub>2</sub>.

$$\begin{aligned} \%S(\text{lb/lbNG}) &= \left( \frac{1 \text{ gr}}{100 \text{ scf}} \right) \left( \frac{1 \text{ lb}}{7000 \text{ gr}} \right) \left( \frac{24.5 \text{ L}}{\text{mol NG}} \right) \left( \frac{1 \text{ mol}}{16 \text{ g}} \right) \left( \frac{454 \text{ g}}{1 \text{ lb}} \right) \left( \frac{0.035 \text{ scf}}{1 \text{ L}} \right) (100) \\ &= 0.00348\% \text{ sulfur by weight} \end{aligned}$$

$$\begin{aligned} \text{lb SO}_2/\text{scf gas} &= (0.000348)(1 \text{ lb}/23.8 \text{ scf gas})(64 \text{ lb SO}_2/32 \text{ lb S}) \\ &= 2.92 \text{ E-6 lb SO}_2/\text{scf gas} \end{aligned}$$

$\text{lb SO}_2/V_{\text{exhaust}} = (\text{lb SO}_2/\text{scf gas}) \div (\text{F factor}) (\text{Btu content of natural gas})$

$$\left( \frac{\text{lb SO}_2}{V_{\text{exhaust}}} \right) = \frac{\left( 2.92 \text{ E} - 6 \frac{\text{lb SO}_2}{\text{scf gas}} \right) \left( \frac{10^6 \text{ Btu}}{\text{MMBtu}} \right)}{\left( 8710 \frac{\text{dscf}}{\text{MMBtu}} \right) \left( 1000 \frac{\text{Btu}}{\text{scf}} \right)} = 3.35 \text{ E} - 7 \frac{\text{lb SO}_2}{\text{dscf exhaust}}$$

$$V_{\text{SO}_2}/V_{\text{exhaust}} = nRT/P$$

where,

$n = \text{moles SO}_2 = (3.35 \text{ E} - 7 \text{ lb SO}_2/\text{dscf exhaust}) / (64 \text{ lb SO}_2/\text{lb-mol})$

$R = \text{universal gas constant} = 10.73 \text{ psi-ft}^3/\text{lb-mol-R}$

$T = \text{standard temperature} = 60 \text{ }^\circ\text{F} = 520 \text{ }^\circ\text{R}$

$P = \text{standard pressure} = 14.7 \text{ psi}$

$$\text{Therefore, } \left( \frac{V_{\text{SO}_2}}{V_{\text{exhaust}}} \right) = \frac{\left( \frac{3.35 \text{ E} - 6 \text{ lb SO}_2}{\text{dscf exhaust}} \right) \left( \frac{10.73 \text{ psi-ft}^3}{\text{lb-mole-}^\circ\text{R}} \right) (520 \text{ }^\circ\text{R})}{\left( \frac{64 \text{ lb SO}_2}{\text{lb-mol}} \right) (14.7 \text{ psi})} = 1.99 \text{ E} - 6 \frac{\text{dscf}}{\text{dscf exhaust}}$$

$$= 1.99 \text{ ppmv dry}$$

Diluting it to 15% O<sub>2</sub>

$$\text{ppmv @ 15\% O}_2 = \text{ppmv dry} \times \left( \frac{20.9 - 15}{20.9} \right) = 0.56 \text{ ppmv}$$

0.56 ppmv << 150 ppmv.

To ensure compliance with this limit, condition 20 on the current permit has been replaced with condition 19 on proposed permit -18-4.

#### SO<sub>x</sub> requirement from 60.333(b)

Section 60.333 (b) also prohibits the owner or operator from burning in any stationary gas turbine any fuel, which contains sulfur in excess of 0.8 percent by weight.

Natural gas with fuel sulfur content of 1.0 gr/100 scf or less assures compliance with the 0.8% sulfur by weight limit of New Source Performance Standard, Subpart GG - 40 CFR Subpart 60.333(b). This standard can be converted to an expression of weight percent of sulfur in the natural gas (ng):

$$\begin{aligned} \%S(\text{lb/lbNG}) &= \left( \frac{1 \text{ gr}}{100 \text{ scf}} \right) \left( \frac{1 \text{ lb}}{7000 \text{ gr}} \right) \left( \frac{24.5 \text{ L}}{\text{mol NG}} \right) \left( \frac{1 \text{ mol}}{16 \text{ g}} \right) \left( \frac{454 \text{ g}}{1 \text{ lb}} \right) \left( \frac{0.035 \text{ scf}}{1 \text{ L}} \right) (100) \\ &= 0.00348\% \text{ sulfur by weight} \end{aligned}$$

Thus natural gas with fuel sulfur content of 1.0 gr/100 scf or less assures compliance with the 0.8% sulfur by weight limit of New Source Performance Standard, Subpart GG - 40 CFR Subpart 60.333(b).

To ensure compliance, condition 21 on the current permit has been carried over and is included as condition 20 on proposed permit -18-4. Additionally, condition 23 on the current permit, which allowed the burning of fuel with a sulfur content greater than 0.8% by weight, has been removed.

#### Monitoring of Operations from 60.334

Section 60.334(a) requires the owner/operator of any stationary gas turbine using water or steam injection to control NO<sub>x</sub> emissions to install, calibrate, maintain and operate a continuous monitoring system to monitor and record the fuel consumption and the ratio of water to fuel fired. To ensure compliance, condition 17 on the current permit has been carried over and is included as condition 16 on proposed permit -18-4.

Section 60.334(c) allows the use of previously approved NO<sub>x</sub> monitoring systems for units that do not use steam or water injection to control NO<sub>x</sub> emissions. This permit unit uses water injection. Therefore this section is not applicable.

Section 60.334(d, e, and f) contain requirements for gas turbines that commenced construction after July 8, 2004. These requirements are not applicable, because this gas turbine commenced construction prior to July 8, 2004.

Section 60.334(h) requires monitoring of sulfur content and nitrogen content of the fuel being fired in the turbine. In determining the sulfur and nitrogen content of the fuel, Section 60.335(e) allows the analysis to be performed by the owner/operator, service contractor, fuel vendor, or any other qualified agency. To ensure compliance, conditions 22, 24, and 25 on the current permit have been carried over and are included as conditions 21, 22, and 23 on proposed permit -18-4.

Section 60.334(j) requires the owner/operator to submit reports of excess emissions and monitor downtime, in accordance with §60.7(c), for all periods including startup, shutdown, and malfunction. To ensure compliance,

condition 29 on the current permit has been carried over and is included as condition 30 on proposed permit -18-4.

Test Methods and Procedures from 60.335

Section 60.335(b) requires that the monitoring device of Section 60.334(a) shall be used to determine the fuel consumption and the water-to-fuel ratio necessary to comply with Section 60.332 at 30, 50, 75, and 100 percent of peak load or at four points in the normal operating range of the gas turbine, including the minimum point in the range and peak load. All loads shall be corrected to ISO conditions using the appropriate equations supplied by the manufacturer. To ensure compliance, conditions 30 and 34 on the current permit have been carried over and are included as conditions 31 and 34 on proposed permit -18-4.

Section 60.335(c) provides alternatives to the reference methods and procedures specified in this section. This is not applicable, as the affected units in this project do not use these alternatives.

**O. 40 CFR Part 61, Subpart M, National Emissions Standards for Asbestos**

These regulations apply to demolition or renovation activity, as defined in 40 CFR 61.141. 40 CFR Section 61.156 of this Subpart was amended on July 20, 2004. However, the amendments to this section do not have any affect on current permit requirements and will therefore not be addressed in this evaluation.

Compliance with the provisions of this rule is ensured by condition 35 of permit -0-2.

**P. 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners**

There are applicable requirements from Title VI of the CAA (Stratospheric Ozone) that apply to all sources in general. These requirements pertain to air conditioners, chillers and refrigerators located at a Title V source and to disposal of air conditioners or maintenance/recharging/disposal of motor vehicle air conditioners (MVAC). These requirements are addressed in condition 28 of permit -0-2.

**Q. 40 CFR Part 82, Subpart F, Recycling and Emissions Reduction**

There are applicable requirements from Title VI of the CAA (Stratospheric Ozone) that apply to all sources in general. These requirements pertain to

air conditioners, chillers and refrigerators located at a Title V source and to disposal of air conditioners or maintenance/recharging/disposal of motor vehicle air conditioners (MVAC). These requirements are addressed in condition 27 of permit -0-2.

**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.

Major Source Thresholds (9/21/06 Revision of Rule 2201)

Pollutant	lb/year	ton/year
NO <sub>x</sub>	50,000	25
SO <sub>x</sub>	140,000	70
PM <sub>10</sub>	140,000	70
CO	200,000	100
VOC	50,000	25

1. N-238-1-2: Corn Receiving and Storage Operation With a Baghouse and Bin Vent Filter

This permit unit does not have emissions limits for NO<sub>x</sub>, SO<sub>x</sub>, CO, and VOC. Therefore, this permit unit is not subject to CAM for NO<sub>x</sub>, SO<sub>x</sub>, CO, and VOC.

This unit may be subject to CAM for PM<sub>10</sub> since there are PM limits and the unit has add-on controls in the form of a baghouse and bin vent filter.

PM emissions from silo storage are limited to 0.6 lb/hr, and PM emissions from unloading are limited to 0.6 lb/hr. Per District Policy, in the absence of PM<sub>10</sub> emission factors or speciation data, it will be assumed that 50% of the total suspended PM is PM<sub>10</sub>. It will also conservatively be assumed that the combined capture efficiency of the baghouse and bin vent filter is 99%.

Therefore, uncontrolled PM<sub>10</sub> emissions are calculated as follows:

$$[2 \times ((0.6 \text{ lb-PM/hr}) \div (1 - 0.99))] \times 24 \text{ hr/day} \times 365 \text{ day/yr} = 1,051,200 \text{ lb-PM/yr}$$

$$1,051,200 \text{ lb-PM/yr} \times 0.50 \text{ lb-PM}_{10}/\text{lb-PM} = 525,600 \text{ lb-PM}_{10}/\text{yr}$$

This permit is subject to CAM for PM<sub>10</sub> since there is a PM limit, it has add-on controls in the form of a baghouse, and the pre-control PM<sub>10</sub> potential to emit is greater than the major source threshold of 140,000 pounds PM<sub>10</sub>/year as shown above.

In order to determine if a 15-minute monitoring interval is required, we will determine if post-control emissions also exceed the Major Source threshold for PM<sub>10</sub> emissions:

$$2 \times (0.6 \text{ lb-PM/hr} \times 24 \text{ hr/day} \times 365 \text{ day/yr}) = 10,512 \text{ lb-PM/yr}$$

$$10,512 \text{ lb-PM/yr} \times 0.50 \text{ lb-PM}_{10}/\text{lb-PM} = 5,256 \text{ lb-PM}_{10}/\text{yr}$$

Since the post-control annual emissions do not exceed the Major Source threshold for PM<sub>10</sub> of 140,000 lb/year, a once-daily monitoring interval is sufficient to determine compliance with CAM.

The CAM requirements on the current permit will be carried over to proposed permit -1-2. CAM is satisfied for this unit by checking for visible emissions on a daily basis and by maintaining a differential pressure gauge on the baghouse. Additionally, monitoring the pressure gauge each day that the baghouse operates will be required.

Conditions 8-10, 12-14, and 16-17 on the proposed PTO ensure compliance.

## 2. N-238-2-2: Corn Cleaning Operation With Baghouses and Bin Vent Filter

This permit unit does not have emissions limits for NO<sub>x</sub>, SO<sub>x</sub>, CO, and VOC. Therefore, this permit unit is not subject to CAM for NO<sub>x</sub>, SO<sub>x</sub>, CO, and VOC.

This unit may be subject to CAM for PM<sub>10</sub> since there are PM limits and the unit has add-on controls in the form of baghouses and a bin vent filter.

PM emissions from the elevator are limited to 0.017 lb/hr, PM emissions from cleaning are limited to 0.175 lb/hr, and PM emissions from silo cleaning are limited to 0.014 lb/hr. Per District Policy, in the absence of PM<sub>10</sub> emission factors or speciation data, it will be assumed that 50% of the total suspended PM is PM<sub>10</sub>. The elevator is vented to the bin vent filter and the cleaning operations vent to baghouses. It will conservatively be assumed that the capture efficiency of the baghouses is 99% and the bin vent filter is 90%.

Therefore, uncontrolled PM<sub>10</sub> emissions are calculated as follows:

$$\begin{aligned} & [(0.017 \text{ lb-PM/hr}) \div (1 - 0.90)] \times 24 \text{ hr/day} \times 365 \text{ day/yr} = 1,489 \text{ lb-PM/yr} \\ & [(0.175 \text{ lb-PM/hr}) \div (1 - 0.99)] \times 24 \text{ hr/day} \times 365 \text{ day/yr} = 153,300 \text{ lb-PM/yr} \\ & [(0.014 \text{ lb-PM/hr}) \div (1 - 0.99)] \times 24 \text{ hr/day} \times 365 \text{ day/yr} = 12,264 \text{ lb-PM/yr} \end{aligned}$$

$$(1,489 \text{ lb-PM/yr} + 153,300 \text{ lb-PM/yr} + 12,264 \text{ lb-PM/yr}) \times 0.50 \text{ lb-PM}_{10}/\text{lb-PM} = 83,527 \text{ lb-PM}_{10}/\text{yr}$$

This permit is not subject to CAM because the pre-control PM<sub>10</sub> potential to emit is less than the major source threshold of 140,000 pounds PM<sub>10</sub>/year as shown above.

### 3. N-238-8-2: Gluten Milling, Transfer, and Storage With a Dust Collector

This permit unit does not have emissions limits for NO<sub>x</sub>, SO<sub>x</sub>, CO, and VOC. Therefore, this permit unit is not subject to CAM for NO<sub>x</sub>, SO<sub>x</sub>, CO, and VOC.

This unit may be subject to CAM for PM<sub>10</sub> since there are PM limits and the unit has add-on controls in the form of a baghouse.

PM emissions from the baghouse are limited to 0.036 lb/hr. Per District Policy, in the absence of PM<sub>10</sub> emission factors or speciation data, it will be assumed that 50% of the total suspended PM is PM<sub>10</sub>. It will be assumed that the capture efficiency of the baghouse is 99%.

Therefore, uncontrolled PM<sub>10</sub> emissions are calculated as follows:

$$[(0.036 \text{ lb-PM/hr}) \div (1 - 0.99)] \times 24 \text{ hr/day} \times 365 \text{ day/yr} = 31,536 \text{ lb-PM/yr}$$

$$31,536 \text{ lb-PM/yr} \times 0.50 \text{ lb-PM}_{10}/\text{lb-PM} = 15,768 \text{ lb-PM}_{10}/\text{yr}$$

This permit is not subject to CAM because the pre-control PM<sub>10</sub> potential to emit is less than the major source threshold of 140,000 pounds PM<sub>10</sub>/year as shown above.

### 4. N-238-9-4: Gluten Loadout System With a Baghouse

This permit unit does not have emissions limits for NO<sub>x</sub>, SO<sub>x</sub>, CO, and VOC. Therefore, this permit unit is not subject to CAM for NO<sub>x</sub>, SO<sub>x</sub>, CO, and VOC.

This unit may be subject to CAM for PM<sub>10</sub> since there are PM limits and the unit has add-on controls in the form of a baghouse.

PM<sub>10</sub> emissions from the baghouse are limited to 0.004 lb-PM<sub>10</sub>/ton of material processed. The quantity of material processed is limited to 150

ton/day. It will be assumed that the capture efficiency of the baghouse is 99%.

Therefore, uncontrolled PM<sub>10</sub> emissions are calculated as follows:

$$[0.004 \text{ PM}_{10}/\text{ton} \div (1 - 0.99)] \times 150 \text{ ton/day} \times 365 \text{ day/yr} = 21,900 \text{ lb-PM/yr}$$

This permit is not subject to CAM because the pre-control PM<sub>10</sub> potential to emit is less than the major source threshold of 140,000 pounds PM<sub>10</sub>/year as shown above.

5. N-238-10-7: 21 MMBtu/hr Starch Dryer With Two Cyclones Served by Two Gas Scrubbers

This permit unit has emissions limits for NO<sub>x</sub>, SO<sub>x</sub>, CO, and VOC but it does not have add-on controls for these criteria pollutants. Therefore, this permit unit is not subject to CAM for NO<sub>x</sub>, SO<sub>x</sub>, CO, and VOC.

This unit may be subject to CAM for PM<sub>10</sub> since there are PM<sub>10</sub> limits and the unit has add-on controls in the form cyclones and wet scrubbers that are used only to control PM<sub>10</sub>.

PM<sub>10</sub> emissions from the dryer are limited to 0.24 lb-PM<sub>10</sub>/ton of starch dried. The quantity of starch dried is limited to 320 ton/day. Since the cyclones are prior to the scrubbers, only the scrubber control efficiency will be used for calculations to be conservative. The manufacturer has verified 99% PM<sub>10</sub> control efficiency for the scrubbers.

Therefore, uncontrolled PM<sub>10</sub> emissions are calculated as follows:

$$[0.24 \text{ PM}_{10}/\text{ton} \div (1 - 0.99)] \times 320 \text{ ton/day} \times 365 \text{ day/yr} = 2,803,200 \text{ lb-PM}_{10}/\text{yr}$$

This permit is subject to CAM for PM<sub>10</sub> since there is a PM<sub>10</sub> limit, it has add-on controls in the form of cyclones and scrubbers, and the pre-control PM<sub>10</sub> potential to emit is greater than the major source threshold of 140,000 pounds PM<sub>10</sub>/year as shown above.

In order to determine if a 15-minute monitoring interval is required, we will determine if post-control emissions also exceed the Major Source threshold for PM<sub>10</sub> emissions:

$$0.24 \text{ PM}_{10}/\text{ton} \times 320 \text{ ton/day} \times 365 \text{ day/yr} = 28,032 \text{ lb-PM}_{10}/\text{yr}$$

Since the post-control annual emissions do not exceed the Major Source threshold for PM<sub>10</sub> of 140,000 lb/year, a once-daily monitoring interval is sufficient to determine compliance with CAM.

The CAM requirements on the current permit will be carried over to proposed permit -10-7. CAM is satisfied for this unit by maintaining a differential pressure gauge on the scrubbers within a level recommended by the manufacturer, and by maintaining a liquid recirculation rate for each scrubber within a level recommended by the manufacturer. Additionally, monitoring the pressure gauge and liquid recirculation rate each day that the dryer operates will be required.

Conditions 10-11, 14-15, and 34-38 on the proposed PTO ensure compliance.

#### 6. N-238-11-3: Starch Transfer and Storage Served by a Dust Collector

This permit unit does not have emissions limits for NO<sub>x</sub>, SO<sub>x</sub>, CO, and VOC. Therefore, this permit unit is not subject to CAM for NO<sub>x</sub>, SO<sub>x</sub>, CO, and VOC.

This unit may be subject to CAM for PM<sub>10</sub> since there are PM limits and the unit has add-on controls in the form of a baghouse.

PM emissions from the baghouse are limited to 0.041 lb/hr. Per District Policy, in the absence of PM<sub>10</sub> emission factors or speciation data, it will be assumed that 50% of the total suspended PM is PM<sub>10</sub>. It will be assumed that the capture efficiency of the baghouse is 99%.

Therefore, uncontrolled PM<sub>10</sub> emissions are calculated as follows:

$$[(0.041 \text{ lb-PM/hr}) \div (1 - 0.99)] \times 24 \text{ hr/day} \times 365 \text{ day/yr} = 35,916 \text{ lb-PM/yr}$$

$$35,916 \text{ lb-PM/yr} \times 0.50 \text{ lb-PM}_{10}/\text{lb-PM} = 17,958 \text{ lb-PM}_{10}/\text{yr}$$

This permit is not subject to CAM because the pre-control PM<sub>10</sub> potential to emit is less than the major source threshold of 140,000 pounds PM<sub>10</sub>/year as shown above.

#### 7. N-238-12-2: Bulk Starch Loadout Served by a Dust Collector

This permit unit does not have emissions limits for NO<sub>x</sub>, SO<sub>x</sub>, CO, and VOC. Therefore, this permit unit is not subject to CAM for NO<sub>x</sub>, SO<sub>x</sub>, CO, and VOC.

This unit may be subject to CAM for PM<sub>10</sub> since there are PM limits and the unit has add-on controls in the form of a baghouse.

PM emissions from the baghouse are limited to 0.041 lb/hr. Per District Policy, in the absence of PM<sub>10</sub> emission factors or speciation data, it will be assumed that 50% of the total suspended PM is PM<sub>10</sub>. It will be assumed that the capture efficiency of the baghouse is 99%.

Therefore, uncontrolled PM<sub>10</sub> emissions are calculated as follows:

$$[(0.041 \text{ lb-PM/hr}) \div (1 - 0.99)] \times 24 \text{ hr/day} \times 365 \text{ day/yr} = 35,916 \text{ lb-PM/yr}$$

$$35,916 \text{ lb-PM/yr} \times 0.50 \text{ lb-PM}_{10}/\text{lb-PM} = 17,958 \text{ lb-PM}_{10}/\text{yr}$$

This permit is not subject to CAM because the pre-control PM<sub>10</sub> potential to emit is less than the major source threshold of 140,000 pounds PM<sub>10</sub>/year as shown above.

8. N-238-13-6: Germ Dryer Served by a Cyclone, a Particulate Scrubber, and a SO<sub>x</sub> Scrubber

This permit unit does not have emissions limits for NO<sub>x</sub> and CO. Therefore, this permit unit is not subject to CAM for NO<sub>x</sub> and CO.

This permit unit has an emissions limit for VOC, but it does not have an add-on control for VOC. Therefore, this permit unit is not subject to CAM for VOC.

This unit may be subject to CAM for SO<sub>x</sub> and PM<sub>10</sub> since there are SO<sub>x</sub> and PM<sub>10</sub> emissions limits, and the unit has add-on controls for these two pollutants in the form of a particulate scrubber and a SO<sub>x</sub> scrubber.

PM<sub>10</sub> emissions are limited to 0.62 lb/hr and SO<sub>x</sub> emissions are limited to 0.50 lb/hr. The manufacturer of the particulate scrubber has verified a 99% PM<sub>10</sub> control efficiency, and the manufacturer of the SO<sub>x</sub> scrubber has verified a control efficiency of 81.9%

Uncontrolled PM<sub>10</sub> emissions are calculated as follows:

$$[0.62 \text{ lb/hr} \div (1 - 0.99)] \times 24 \text{ hr/day} \times 365 \text{ day/yr} = 543,120 \text{ lb-PM}_{10}/\text{yr}$$

Uncontrolled SO<sub>x</sub> emissions are calculated as follows:

$$[0.50 \text{ lb/hr} \div (1 - 0.819)] \times 24 \text{ hr/day} \times 365 \text{ day/yr} = 24,199 \text{ lb-SO}_x/\text{yr}$$

This permit is not subject to CAM for SO<sub>x</sub> since the pre-control SO<sub>x</sub> potential to emit is less than the major source threshold of 140,000 pounds SO<sub>x</sub>/year as shown above.

This permit is subject to CAM for PM<sub>10</sub> since there is a PM<sub>10</sub> limit, it has add-on controls in the form of a particulate scrubber, and the pre-control PM<sub>10</sub> potential to emit is greater than the major source threshold of 140,000 pounds PM<sub>10</sub>/year as shown above.

In order to determine if a 15-minute monitoring interval is required, we will determine if post-control emissions also exceed the Major Source threshold for PM<sub>10</sub> emissions:

$$0.62 \text{ lb/hr} \times 24 \text{ hr/day} \times 365 \text{ day/yr} = 5,431 \text{ lb-PM}_{10}/\text{yr}$$

Since the post-control annual emissions do not exceed the Major Source threshold for PM<sub>10</sub> of 140,000 lb/year, a once-daily monitoring interval is sufficient to determine compliance with CAM.

The CAM requirements on the current permit will be carried over to proposed permit -13-6. CAM is satisfied for this unit by maintaining a liquid to gas ratio for the scrubber within a level recommended by the manufacturer. Additionally, daily monitoring records of the scrubber liquid flow rate will be required.

Conditions 5, 12-14, and 17-18 on the proposed PTO ensure compliance.

#### 9. N-238-14-2: Germ Transfer and Storage Served by a Baghouse

This permit unit does not have emissions limits for NO<sub>x</sub>, SO<sub>x</sub>, CO, and VOC. Therefore, this permit unit is not subject to CAM for NO<sub>x</sub>, SO<sub>x</sub>, CO, and VOC.

This unit may be subject to CAM for PM<sub>10</sub> since there are PM limits and the unit has add-on controls in the form of a baghouse.

PM emissions from the baghouse are limited to 0.043 lb/hr. Per District Policy, in the absence of PM<sub>10</sub> emission factors or speciation data, it will be assumed that 50% of the total suspended PM is PM<sub>10</sub>. It will be assumed that the capture efficiency of the baghouse is 99%.

Therefore, uncontrolled PM<sub>10</sub> emissions are calculated as follows:

$$[(0.043 \text{ lb-PM/hr}) \div (1 - 0.99)] \times 24 \text{ hr/day} \times 365 \text{ day/yr} = 37,668 \text{ lb-PM/yr}$$

$$37,668 \text{ lb-PM/yr} \times 0.50 \text{ lb-PM}_{10}/\text{lb-PM} = 18,834 \text{ lb-PM}_{10}/\text{yr}$$

This permit is not subject to CAM because the pre-control PM<sub>10</sub> potential to emit is less than the major source threshold of 140,000 pounds PM<sub>10</sub>/year as shown above.

10. N-238-15-2: Bulk Germ Loadout

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

11. N-238-16-2: Filter-Aid Receiving and Storage Served by a Baghouse

This permit unit does not have emissions limits for NO<sub>x</sub>, SO<sub>x</sub>, CO, and VOC. Therefore, this permit unit is not subject to CAM for NO<sub>x</sub>, SO<sub>x</sub>, CO, and VOC.

This unit may be subject to CAM for PM<sub>10</sub> since there are PM limits and the unit has add-on controls in the form of a baghouse.

PM emissions from the baghouse are limited to 0.01 lb/hr. Per District Policy, in the absence of PM<sub>10</sub> emission factors or speciation data, it will be assumed that 50% of the total suspended PM is PM<sub>10</sub>. It will be assumed that the capture efficiency of the baghouse is 99%.

Therefore, uncontrolled PM<sub>10</sub> emissions are calculated as follows:

$$[(0.01 \text{ lb-PM/hr}) \div (1 - 0.99)] \times 24 \text{ hr/day} \times 365 \text{ day/yr} = 8,760 \text{ lb-PM/yr}$$

$$8,760 \text{ lb-PM/yr} \times 0.50 \text{ lb-PM}_{10}/\text{lb-PM} = 4,380 \text{ lb-PM}_{10}/\text{yr}$$

This permit is not subject to CAM because the pre-control PM<sub>10</sub> potential to emit is less than the major source threshold of 140,000 pounds PM<sub>10</sub>/year as shown above.

12. N-238-17-2: Carbon Receiving and Storage Served by a Baghouse

This permit unit does not have emissions limits for NO<sub>x</sub>, SO<sub>x</sub>, CO, and VOC. Therefore, this permit unit is not subject to CAM for NO<sub>x</sub>, SO<sub>x</sub>, CO, and VOC.

This unit may be subject to CAM for PM<sub>10</sub> since there are PM limits and the unit has add-on controls in the form of a baghouse.

PM emissions from the baghouse are limited to 0.01 lb/hr. Per District Policy, in the absence of PM<sub>10</sub> emission factors or speciation data, it will be assumed

that 50% of the total suspended PM is PM<sub>10</sub>. It will be assumed that the capture efficiency of the baghouse is 99%.

Therefore, uncontrolled PM<sub>10</sub> emissions are calculated as follows:

$$[(0.01 \text{ lb-PM/hr}) \div (1 - 0.99)] \times 24 \text{ hr/day} \times 365 \text{ day/yr} = 8,760 \text{ lb-PM/yr}$$

$$8,760 \text{ lb-PM/yr} \times 0.50 \text{ lb-PM}_{10}/\text{lb-PM} = 4,380 \text{ lb-PM}_{10}/\text{yr}$$

This permit is not subject to CAM because the pre-control PM<sub>10</sub> potential to emit is less than the major source threshold of 140,000 pounds PM<sub>10</sub>/year as shown above.

13. N-238-18-4: 2800 kW Gas Turbine and a Delta Waste Heat Boiler

This permit unit does not have an add-on control device for any pollutant. Therefore, the permit unit is not subject to CAM.

14. N-238-19-4: 12,000 Gallon Aboveground Salt Slurry Storage Tank

This permit unit does not have an add-on control device for any pollutant. Therefore, the permit unit is not subject to CAM.

15. N-238-24-6: First Grind Overflow Tank Served by a SO<sub>x</sub> Scrubber and a Biofilter (The Control Equipment Also Serves N-238-33)

This permit unit does not have emissions limits for NO<sub>x</sub>, PM<sub>10</sub>, and CO. Therefore, this permit unit is not subject to CAM for NO<sub>x</sub>, PM<sub>10</sub>, and CO.

This unit may be subject to CAM for SO<sub>x</sub> and VOC since there are SO<sub>x</sub> and VOC emissions limits, and the unit has add-on controls for these two pollutants in the form of a SO<sub>x</sub> scrubber and VOC biofilter.

Combined SO<sub>x</sub> emissions for units -24 and -33 are limited to 1.25 lb/hr and combined VOC emissions for units -24 and -33 are limited to 0.33 lb/hr. The manufacturer of the SO<sub>x</sub> scrubber has verified a control efficiency of 81.9%, and the manufacturer of the biofilter has verified a control efficiency of 96.3%.

Uncontrolled SO<sub>x</sub> emissions are calculated as follows:

$$[1.25 \text{ lb/hr} \div (1 - 0.819)] \times 24 \text{ hr/day} \times 365 \text{ day/yr} = 60,497 \text{ lb-SO}_x/\text{yr}$$

Uncontrolled VOC emissions are calculated as follows:

$$[0.33 \text{ lb/hr} \div (1 - 0.963)] \times 24 \text{ hr/day} \times 365 \text{ day/yr} = 78,130 \text{ lb-VOC/yr}$$

This permit is not subject to CAM for SO<sub>x</sub> since the pre-control SO<sub>x</sub> potential to emit is less than the major source threshold of 140,000 pounds SO<sub>x</sub>/year as shown above.

This permit is subject to CAM for VOC since there is a VOC limit, it has add-on controls in the form of a biofilter, and the pre-control VOC potential to emit is greater than the major source threshold of 50,000 pounds VOC/year as shown above.

In order to determine if a 15-minute monitoring interval is required, we will determine if post-control emissions also exceed the Major Source threshold for VOC emissions:

$$0.33 \text{ lb/hr} \times 24 \text{ hr/day} \times 365 \text{ day/yr} = 2,891 \text{ lb-VOC/yr}$$

Since the post-control annual emissions do not exceed the Major Source threshold for VOC of 50,000 lb/year, a once-daily monitoring interval is sufficient to determine compliance with CAM.

In order to satisfy CAM requirements, the current permit requires the following: daily records of the biofilter temperature and water flow (condition 15 on PTO -24-5), a water flow rate through the biofilter sprays that is at least 4 gal/min (condition 16), a timeframe for corrective action if the water flow rate through the biofilter sprays is less than 4 gal/min (condition 17), a manufacturer's recommended temperature range for the biofilter (condition 18), daily monitoring of the air flow temperature through the biofilter media (condition 19), and maintenance of the temperature gauge and biofilter spray nozzles (conditions 20 and 21).

However, the biofilter manufacturer does not recommend water sprays for this system because the inlet flue gas is already saturated since the air stream passes through two wet scrubbers prior to entering the biofilter. Consequently, the facility is proposing to remove references to the biofilter water sprays. Since the humidity of the air flow entering the biofilter is dependent on the scrubber sprays, CAM references will be added to the existing monitoring and recordkeeping conditions for the scrubber.

The following changes have been made (additions shown in underline, deletions shown in strikethrough):

Condition 4 of the current permit has been modified as follows, and added to the proposed permit as condition 4.

- The scrubber sprays and/or nozzles shall be strictly maintained in optimum working condition. [District NSR Rule and 40 CFR Part 64]

Condition 5 of the current permit has been modified as follows, and added to the proposed permit as condition 5.

- A minimum liquid to gas ratio of 4 gpm per 1,000 cfm shall be provided for each scrubber. [District NSR Rule and 40 CFR Part 64]

Condition 6, shown below, has been added to the proposed permit.

- If the liquid to gas ratio of the scrubber is less than 4 gpm per 1,000 cfm during operation, the permittee shall correct the liquid to gas ratio to a minimum of 4 gpm per 1,000 cfm as soon as possible, but no longer than 1 hour of operation after detection. If the liquid to gas ratio continues to be less than 4 gpm per 1,000 cfm after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. [40 CFR part 64]

Condition 14 of the current permit has been modified as follows, and added to the proposed permit as condition 17.

- Records of the SO<sub>x</sub> scrubber liquid flow rate shall be observed and recorded ~~weekly~~ daily during operation of this unit. 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 and 40 CFR Part 64]

Condition 15 of the current permit has been modified as follows, and added to the proposed permit as condition 18.

- Records of the biofilter temperature ~~and water flow from sprays~~ shall be observed and recorded daily, during operation of this unit. 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 and 40 CFR part 64]

Condition 16 of the current permit, shown below, has been removed.

- ~~During operation the water flow rate through the biofilter sprays shall not be less than 4 gal/minute. [40 CFR part 64]~~

Condition 17 of the current permit, shown below, has been removed.

- ~~If the water flow rate through the biofilter sprays is less than 4 gal/minute during operation, the permittee shall correct the water flow rate to exceed 4 gal/minute, as soon as possible, but no longer than 1 hour of operation after detection. If the water flow rate continues to be less than 4 gal/minute after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. [40 CFR part 64]~~

Condition 21 of the current permit, shown below, has been removed.

- ~~The biofilter spray nozzles shall be maintained per manufacturer's recommendations. [40 CFR part 64]~~

Additionally, conditions 20-23 on the proposed permit ensure compliance with CAM requirements.

16. N-238-25-4: Gluten Dewatering Filter and Vacuum Systems With a SO<sub>x</sub> Scrubber on the Exhaust Stream

This permit unit does not have emissions limits for NO<sub>x</sub>, PM<sub>10</sub>, and CO. Therefore, this permit unit is not subject to CAM for NO<sub>x</sub>, PM<sub>10</sub>, and CO.

This permit unit has an emissions limit for VOC, but it does not have an add-on control for VOC. Therefore, this permit unit is not subject to CAM for VOC.

This unit may be subject to CAM for SO<sub>x</sub> since there is a SO<sub>x</sub> emissions limit and the unit has an add-on control for SO<sub>x</sub> in the form of a scrubber.

SO<sub>x</sub> emissions are limited to 0.146 lb/hr. During previous permitting projects for the unit, a control efficiency of 41.7% was established for the scrubber.

Uncontrolled SO<sub>x</sub> emissions are calculated as follows:

$$[0.146 \text{ lb/hr} \div (1 - 0.417)] \times 24 \text{ hr/day} \times 365 \text{ day/yr} = 2,194 \text{ lb-SO}_x\text{/yr}$$

This permit is not subject to CAM for SO<sub>x</sub> since the pre-control SO<sub>x</sub> potential to emit is less than the major source threshold of 140,000 pounds SO<sub>x</sub>/year as shown above.

17. N-238-29-2: Sulfurous Acid Plant Consisting of: An Elemental Sulfur Burner and Two Absorbers Vented to a Scrubber with a Mist Eliminator; Twelve Steep Tanks and One Draw Tank Vented to a Scrubber Serving the Acid Plant

This permit unit does not have emissions limits for NO<sub>x</sub>, PM<sub>10</sub>, CO, and VOC. Therefore, this permit unit is not subject to CAM for NO<sub>x</sub>, PM<sub>10</sub>, CO, and VOC.

This unit may be subject to CAM for SO<sub>x</sub> since there is a SO<sub>x</sub> emissions limit and the unit has an add-on control for SO<sub>x</sub> in the form of a scrubber.

SO<sub>x</sub> emissions are limited to 0.7 lb/ton of sulfur burned. The quantity of sulfur burned in any one day is limited to 6,000 lb/day (3 ton/day). The control efficiency of the scrubber is listed as at least 99%

Uncontrolled SO<sub>x</sub> emissions are calculated as follows:

$$[0.7 \text{ SO}_x/\text{ton} \div (1 - 0.99)] \times 3 \text{ ton/day} \times 365 \text{ day/yr} = 76,650 \text{ lb-SO}_x/\text{yr}$$

This permit is not subject to CAM for SO<sub>x</sub> since the pre-control SO<sub>x</sub> potential to emit is less than the major source threshold of 140,000 pounds SO<sub>x</sub>/year as shown above.

18. N-238-30-2: Soda Ash Receiving and Storage with One 60,000 Gallon Storage Tank Served by a Wet Scrubber

This permit unit does not have emissions limits for NO<sub>x</sub>, SO<sub>x</sub>, CO, and VOC. Therefore, this permit unit is not subject to CAM for NO<sub>x</sub>, SO<sub>x</sub>, CO, and VOC.

This unit may be subject to CAM for PM<sub>10</sub> since there is a PM<sub>10</sub> limit and the unit has an add-on control in the form a wet scrubber.

PM<sub>10</sub> emissions from the dryer are limited to 0.002 lb-PM<sub>10</sub>/ton of material received. The quantity of material received is limited to 54 ton/day. The control efficiency of the scrubber is 99% for PM<sub>10</sub>.

Therefore, uncontrolled PM<sub>10</sub> emissions are calculated as follows:

$$[0.002 \text{ PM}_{10}/\text{ton} \div (1 - 0.99)] \times 54 \text{ ton/day} \times 365 \text{ day/yr} = 3,942 \text{ lb-PM}_{10}/\text{yr}$$

This permit is not subject to CAM for PM<sub>10</sub> since the pre-control PM<sub>10</sub> potential to emit is less than the major source threshold of 140,000 pounds PM<sub>10</sub>/year as shown above.

19.N-238-33-2: Gluten Dryer Served by a Cyclone, a Particulate Matter Scrubber, a SO<sub>x</sub> Scrubber, and a Biofilter (The Control Equipment Also Serves N-238-24)

This permit unit does not have emissions limits for NO<sub>x</sub> and CO. Therefore, this permit unit is not subject to CAM for NO<sub>x</sub> and CO.

This unit may be subject to CAM for SO<sub>x</sub>, PM<sub>10</sub>, and VOC since there are SO<sub>x</sub>, PM<sub>10</sub>, and VOC emissions limits, and the unit has add-on controls for these three pollutants in the form of a SO<sub>x</sub> scrubber, a PM<sub>10</sub> scrubber, and VOC biofilter.

Combined SO<sub>x</sub> emissions for units -24 and -33 are limited to 1.25 lb/hr and combined VOC emissions for units -24 and -33 are limited to 0.33 lb/hr. The PM<sub>10</sub> emission limit for unit -33 is 1.04 lb/hr. The manufacturer of the SO<sub>x</sub> scrubber has verified a control efficiency of 81.9%, and the manufacturer of the biofilter has verified a control efficiency of 96.3%. A control efficiency of 99% will be used for the particulate scrubber.

Uncontrolled SO<sub>x</sub> emissions are calculated as follows:

$$[1.25 \text{ lb/hr} \div (1 - 0.819)] \times 24 \text{ hr/day} \times 365 \text{ day/yr} = 60,497 \text{ lb-SO}_x/\text{yr}$$

Uncontrolled VOC emissions are calculated as follows:

$$[0.33 \text{ lb/hr} \div (1 - 0.963)] \times 24 \text{ hr/day} \times 365 \text{ day/yr} = 78,130 \text{ lb-VOC/yr}$$

Uncontrolled PM<sub>10</sub> emissions are calculated as follows:

$$[1.04 \text{ lb/hr} \div (1 - 0.99)] \times 24 \text{ hr/day} \times 365 \text{ day/yr} = 911,040 \text{ lb-PM}_{10}/\text{yr}$$

This permit is not subject to CAM for SO<sub>x</sub> since the pre-control SO<sub>x</sub> potential to emit is less than the major source threshold of 140,000 pounds SO<sub>x</sub>/year as shown above.

This permit is subject to CAM for VOC since there is a VOC limit, it has add-on controls in the form of a biofilter, and the pre-control VOC potential to emit is greater than the major source threshold of 50,000 pounds VOC/year as shown above.

Additionally, this permit is subject to CAM for PM<sub>10</sub> since there is a PM<sub>10</sub> limit, it has add-on controls in the form of a particulate scrubber, and the pre-control PM<sub>10</sub> potential to emit is greater than the major source threshold of 140,000 pounds PM<sub>10</sub>/year as shown above.

In order to determine if a 15-minute monitoring interval is required, we will determine if post-control emissions also exceed the Major Source threshold for VOC and PM<sub>10</sub> emissions:

$$0.33 \text{ lb/hr} \times 24 \text{ hr/day} \times 365 \text{ day/yr} = 2,891 \text{ lb-VOC/yr}$$

$$1.04 \text{ lb/hr} \times 24 \text{ hr/day} \times 365 \text{ day/yr} = 9,110 \text{ lb-PM}_{10}\text{/yr}$$

Since the post-control annual emissions for VOC and PM<sub>10</sub> do not exceed the Major Source thresholds for either pollutant, a once-daily monitoring interval is sufficient to determine compliance with CAM.

In order to satisfy CAM requirements, the current permit requires the following: daily records of the PM scrubber liquid flow rate (condition 17 on PTO -33-1), daily records of the biofilter temperature and water flow (condition 18), a water flow rate through the biofilter sprays that is at least 4 gal/min (condition 19), a timeframe for corrective action if the water flow rate through the biofilter sprays is less than 4 gal/min (condition 20), a manufacturer's recommended temperature range for the biofilter (condition 21), daily monitoring of the air flow temperature through the biofilter media (condition 22), and maintenance of the temperature gauge and biofilter spray nozzles (conditions 23 and 24).

However, as previously discussed under CAM for unit -24, the biofilter manufacturer does not recommend water sprays for this system because the inlet flue gas is already saturated since the air stream passes through two wet scrubbers prior to entering the biofilter. Consequently, the facility is proposing to remove references to the biofilter water sprays. Since the humidity of the air flow entering the biofilter is dependent on the scrubber sprays, CAM references will be added to the existing monitoring and recordkeeping conditions for the SO<sub>x</sub> and PM scrubbers.

The following changes have been made (additions shown in underline, deletions shown in strikethrough):

Condition 4 of the current permit has been modified as follows, and added to the proposed permit as condition 4.

- The scrubber sprays and/or nozzles shall be strictly maintained in optimum working condition. [District NSR Rule and 40 CFR Part 64]

Condition 5 of the current permit has been modified as follows, and added to the proposed permit as condition 5.

- A minimum liquid to gas ratio of 4 gpm per 1,000 cfm shall be provided for each scrubber. [District NSR Rule and 40 CFR Part 64]

Condition 6, shown below, has been added to the proposed permit.

- If the liquid to gas ratio of the scrubber is less than 4 gpm per 1,000 cfm during operation, the permittee shall correct the liquid to gas ratio to a minimum of 4 gpm per 1,000 cfm as soon as possible, but no longer than 1 hour of operation after detection. If the liquid to gas ratio continues to be less than 4 gpm per 1,000 cfm after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. [40 CFR Part 64]

Condition 16 of the current permit has been modified as follows, and added to the proposed permit as condition 20.

- Records of the SO<sub>x</sub> scrubber liquid flow rate shall be observed and recorded ~~weekly~~ daily during operation of this unit. 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 and 40 CFR Part 64]

Condition 18 of the current permit has been modified as follows, and added to the proposed permit as condition 22.

- Records of the biofilter temperature ~~and water flow from sprays~~ shall be observed and recorded daily, during operation of this unit. 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 and 40 CFR part 64]

Condition 19 of the current permit, shown below, has been removed.

- ~~• During operation the water flow rate through the biofilter sprays shall not be less than 4 gal/minute. [40 CFR part 64]~~

Condition 20 of the current permit, shown below, has been removed.

- ~~• If the water flow rate through the biofilter sprays is less than 4 gal/minute during operation, the permittee shall correct the water flow rate to exceed 4 gal/minute, as soon as possible, but no longer than 1 hour of operation after detection. If the water flow rate continues to be less than 4 gal/minute after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. [40 CFR part 64]~~

Condition 24 of the current permit, shown below, has been removed.

- ~~• The biofilter spray nozzles shall be maintained per manufacturer's recommendations. [40 CFR part 64]~~

Additionally, conditions 23-26 on the proposed permit ensure compliance with CAM 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 does not propose to use any model general permit templates.

### **B. Requirements not Addressed by Model General Permit Templates**

The applicant is not proposing any new permit shields.

**C. Obsolete Permit Shields From Existing Permit Requirements**

Condition 42 from permit -18-3 has been modified as follows and added to proposed permit -18-4 as condition 38. The deleted sections and District Rule 4703 have been amended since the initial Title V permit was issued. Therefore a permit shield from these requirements is obsolete.

- Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: 40 CFR 60.332(a), (a)(1), (a)(2), (b), and (f), 60.333 (a) and (b); ~~60.334(a), (b)(2), (c)(1), (c)(2), and (c)(3), and 60.335(b), (c)(2), (c)(3), and (d); District Rule 4703 (as amended 4/25/02), Sections 5.1.1, 5.2, 6.1, 6.3.1, 6.3.3, 6.4, 6.4.5, and 6.4.6 as of the date of permit issuance.~~ A permit shield is granted from these requirements. [District Rule 2520, 13.2]

Condition 43 from permit -18-3 has been modified as follows and added to proposed permit -18-4 as condition 39. The deleted sections have been amended since the initial Title V permit was issued. Therefore a permit shield from these requirements is obsolete.

- Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: 40 CFR 60.7(b), ~~60.8, 60.8(d), 60.13, and 60.13(b);~~ District Rule 1081 (as amended 12/16/93) as of the date of permit issuance. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Y

**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

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# ATTACHMENT A

Draft Renewed Title V Operating Permit

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# San Joaquin Valley Air Pollution Control District

FACILITY: N-238-0-2

EXPIRATION DATE: 03/31/2009

## 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. 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 (12/20/07). [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
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

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: CORN PRODUCTS INTERNATIONAL  
Location: 1021 INDUSTRIAL DR, STOCKTON, CA 95206  
N-238-0-2 : Apr 29 2010 3:38PM - SANDHUG

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 Rules 8011 and 8021] 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 Rules 8011 and 8031] 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 Rules 8011 and 8041] 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 Rules 8011 and 8051] 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 Rules 8011 and Rule 8061] 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 Rules 8011 and Rule 8071] 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, 5.8 and 8.0 (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. {118} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
42. Particulate matter (PM) emissions from the entire facility shall not exceed 25 pounds per hour or 250 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
43. The PM10 limit from the entire facility shall not exceed 200 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
44. On December 31, 2004, the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin January 1 of every year, 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] 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:** N-238-1-2

**EXPIRATION DATE:** 03/31/2009

**EQUIPMENT DESCRIPTION:**

CORN RECEIVING AND STORAGE CONSISTING OF: RECEIVING PITS, VARIOUS CONVEYING EQUIPMENT, THREE HOPPERS ALL VENTED TO A CARTER-DAY MODEL 376-RF8 BAGHOUSE, AND TWO STORAGE BINS EACH EQUIPPED WITH A BIN VENT FILTER

## PERMIT UNIT REQUIREMENTS

1. 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 NSR Rule] Federally Enforceable Through Title V Permit
2. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency based on the manufacturer's recommendation. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Particulate matter emissions from each baghouse shall not exceed 0.002 grains/dscf in concentration. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Particulate matter emissions from unloading shall not exceed 0.6 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Particulate matter emissions from silos 1 and 2 shall not exceed 0.6 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The owner/operator shall check for visible emissions on a daily basis. If any particulate matter emissions are visible, the baghouse and bin vent filter shall be inspected for any tears, abrasions, or holes in the fabric. Any defective or damaged material shall be repaired or replaced. [District Rules 4201, 4202, & 2520 Section 9.3.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
9. Visible emissions from each baghouse shall be evaluated using EPA method 22 for a period of at least 6 minutes at least once during each day the baghouse is operated. 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 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
10. Baghouse and bin vent filter shall be inspected at least quarterly when the unit is 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 and 40 CFR part 64] Federally Enforceable Through Title V Permit
11. Visible emissions from baghouse serving the hoppers shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2520, 9.3.2] 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. 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
13. 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
14. 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
15. Records of quarterly checks of the pressure drop across the bags shall be maintained. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
16. Records of baghouse and bin vent filter 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 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
17. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [40 CFR Part 64] Federally Enforceable Through Title V Permit
18. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070 and 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:** N-238-2-2

**EXPIRATION DATE:** 03/31/2009

**EQUIPMENT DESCRIPTION:**

CORN CLEANING OPERATION WITH: THREE DRAG CONVEYORS AND ONE ELEVATOR VENTED TO A BIN FILTER; ASPERATED CORN CLEANER, TWO HOPPERS, AND VARIOUS CONVEYORS VENTED TO A CARTER-DAY BAGHOUSE; AND ONE CORN CLEANINGS HOPPER VENTED TO A CARTER-DAY BAGHOUSE

## PERMIT UNIT REQUIREMENTS

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1. 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 NSR Rule] Federally Enforceable Through Title V Permit
2. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency based on the manufacturer's recommendation. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Particulate matter emissions from each baghouse shall not exceed 0.002 grains/dscf. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Particulate matter emissions from the elevator shall not exceed 0.017 pounds in any one hour. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Particulate matter emissions from cleaning shall not exceed 0.175 pounds in any one hour. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Particulate matter emissions from the cleaning silo shall not exceed 0.014 pounds in any one hour. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Visible emissions from the baghouse 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 within 48 hours. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. Dust collector system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
11. Dust collector 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 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. Visible emissions from baghouse serving the conveyors shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2520, 9.3.2] 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.

13. Records of baghouse and bin vent filter 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
14. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070 and 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:** N-238-8-2

**EXPIRATION DATE:** 03/31/2009

**EQUIPMENT DESCRIPTION:**

GLUTEN MILLING, TRANSFER, AND STORAGE SERVED BY A CARTER-DAY DUST COLLECTOR, TYPE R-F

## PERMIT UNIT REQUIREMENTS

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1. 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 NSR Rule] Federally Enforceable Through Title V Permit
2. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency based on the manufacturer's recommendation. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Particulate matter emissions from the baghouse shall be no more than 0.002 grain/scf and 0.036 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Visible emissions from the baghouse 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
7. Visible emissions from baghouse serving the gluten milling, transfer and storage shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. Dust collector system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
9. Dust collector 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 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. Records of quarterly checks of the pressure drop across the bags shall be maintained. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
11. Records of duct 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] Federally Enforceable Through Title V Permit
12. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070 and 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: N-238-9-4

EXPIRATION DATE: 03/31/2009

## EQUIPMENT DESCRIPTION:

BULK GLUTEN LOADOUT SYSTEM WITH A STATIONARY HOOD AND A W.W. SLY MODEL XP-10 RETRACTABLE LOADING SPOUT SERVED BY AN ALANCO MODEL 378-RFP-FILTER BAGHOUSE

## PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. The baghouse shall be equipped with an operational pressure differential gauge to indicate the pressure drop across the bags. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Visible emissions from the baghouse serving the gluten meal loadout operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Material removed from baghouse shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Replacement bags numbering at least 10% of the total number of bags in the baghouse using each type of bag shall be maintained on the premises. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District NSR Rule] Federally Enforceable Through Title V Permit
7. All ducting from the loading spout to the baghouse shall be properly maintained to prevent fugitive dust emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
8. PM10 emissions shall not exceed 0.004 pounds per ton of material processed. [District NSR Rule] Federally Enforceable Through Title V Permit
9. The quantity of material processed by the gluten meal loadout system shall not exceed 150 tons in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Visible emissions from the baghouse 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
11. Dust collector system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. Dust collector 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 2520, 9.3.2] Federally Enforceable Through Title V Permit
13. Records of quarterly checks of the pressure drop across the bags shall be maintained. [District Rule 2520, 9.3.2] 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. A record of the daily amount of material processed by the system shall be kept on the premises at all times and shall be made available for the District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
15. Records of duct 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] Federally Enforceable Through Title V Permit
16. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070 and 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: N-238-10-7

EXPIRATION DATE: 03/31/2009

## EQUIPMENT DESCRIPTION:

ONE (1) PCC/BLOOM MODEL S103-020 STARCH DRYER SERVED BY TWO (2) DUCON MULTIVANE GAS SCRUBBERS, TYPE L, MODEL II, AND TWO (2) CYCLONES

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Exhaust from the turbine and heat recovery boiler unit permitted under N-238-18 may be vented to the starch dryer. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Emissions from the turbine and heat recovery boiler unit permitted under N-238-18 are not accounted for in the permitted emission limits for the starch dryer. [District Rule 2201] Federally Enforceable Through Title V Permit
4. NOx emissions from the starch dryer shall not exceed 4.3 ppmvd @ 19% O2 referenced as NO2. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
5. CO emissions from the starch dryer shall not exceed 42 ppmvd @ 19% O2. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
6. SOx emissions from the starch dryer burner shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
7. PM10 emissions from the starch dryer shall not exceed 0.24 pounds per ton of starch dried. [District Rule 2201] Federally Enforceable Through Title V Permit
8. No more than 320 tons of starch shall be dried in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. VOC emissions from the starch dryer shall not exceed 20 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Each scrubber shall be equipped with an operational differential pressure gauge to measure the pressure drop across the scrubber (i.e. outlet and inlet sections of the scrubber). [District Rule 2201, 40 CFR Part 64] Federally Enforceable Through Title V Permit
11. The differential pressure across each scrubber shall not exceed 10.0 inches of water column. Upon detecting any excursion, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [District Rule 2520, 40 CFR Part 64] Federally Enforceable Through Title V Permit
12. Each scrubber liquid supply shall have an operational pressure gauge at the inlet to the scrubber. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The scrubber sprays and/or nozzles shall be maintained in optimum working condition and shall be inspected at least once every 12 months. A record of the date of inspection, identification of the equipment, identification of the individual performing the inspection, and any corrective action taken shall be maintained on site. [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. Each scrubber shall be equipped with an operational liquid flow meter. [40 CFR Part 64] Federally Enforceable Through Title V Permit
15. For each scrubber, the liquid recirculation flow rate shall not be less than 83 gallons per minute (equivalent to 3 gpm/1,000 cfm for each fan rated at 27,500 cfm). Upon detecting any excursion, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [District Rule 2201, 40 CFR Part 64] Federally Enforceable Through Title V Permit
16. There shall be no leaks from the by-pass stacks. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The starch dryer shall be fired exclusively on PUC-quality natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
18. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 4309] Federally Enforceable Through Title V Permit
19. Source testing to measure NO<sub>x</sub> and CO emissions from the starch dryer shall be conducted at least once every twenty-four months for each exhaust stack. Source testing shall be conducted when the exhaust from the turbine and waste heat recovery boiler unit permitted under N-238-18 is not being vented to the starch dryer. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
20. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309] Federally Enforceable Through Title V Permit
21. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309] Federally Enforceable Through Title V Permit
22. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
23. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
24. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
25. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
26. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications given in District Policy SSP-3005 (Emissions Monitoring for Rule 4309) or approved by the APCO. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309] 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.

27. If either the NO<sub>x</sub> or CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rule 4309] Federally Enforceable Through Title V Permit
28. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309] Federally Enforceable Through Title V Permit
29. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range [District Rule 4309] Federally Enforceable Through Title V Permit
30. All test results for NO<sub>x</sub> and CO shall be reported in ppmv @ 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), corrected to dry stack conditions. [District Rule 4309] Federally Enforceable Through Title V Permit
31. A daily log containing total hours of operation, type and quantity of fuel used and the amount of starch processed shall be kept on the premises, and shall be made available for District inspection upon request. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
32. Sulfur compound emissions shall not exceed 0.2% by volume, 2,000 ppmv, on a dry basis averaged over 15 consecutive minutes. [County Rules 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus)] Federally Enforceable Through Title V Permit
33. This unit shall be fired exclusively on PUC-quality natural gas which has a sulfur content of less than or equal to 0.017% by weight. [County Rules 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus County)] Federally Enforceable Through Title V Permit
34. Scrubber liquid recirculation rate (gpm) through each scrubber, and differential pressure across each scrubber (inches of water column) shall be observed and recorded at least once a day while the dryer is in operation. The records shall include date of inspection, identification of the equipment, identification of the individual performing the inspection, and the corrective action taken. [District Rule 2520, 9.4.2 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
35. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7 for the scrubbers. [40 CFR Part 64] Federally Enforceable Through Title V Permit
36. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR Part 64.9 for the scrubbers. [40 CFR Part 64] Federally Enforceable Through Title V Permit
37. If the District or EPA determines per 40 CFR 64.7(d)(2) that a Quality Improvement Plan is required, 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
38. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070, 2520, 9.4.2 and 4309, and 40 CFR Part 64] 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:** N-238-11-3

**EXPIRATION DATE:** 03/31/2009

**EQUIPMENT DESCRIPTION:**

STARCH TRANSFER AND STORAGE SERVED BY A CARTER-DAY DUST COLLECTOR, TYPE R-F

## PERMIT UNIT REQUIREMENTS

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1. Visible emissions from truck or railcar loading operations shall be less than 20% opacity. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Particulate matter emissions from the baghouse shall be no more than 0.002 grain/scf and 0.041 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
3. 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 NSR Rule] Federally Enforceable Through Title V Permit
4. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency based on the manufacturer's recommendation. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The flexible air suction hoses shall be used at all times during truck and railcar loading. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Visible emissions from the baghouse 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
9. Visible emissions from baghouse serving the starch transfer and storage shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. Dust collector system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
11. Dust collector 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 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. Records of quarterly checks of the pressure drop across the bags shall be maintained. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
13. Records of duct 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] 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. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rule 1070 and 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:** N-238-12-2

**EXPIRATION DATE:** 03/31/2009  
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**EQUIPMENT DESCRIPTION:**

BULK STARCH LOADOUT SERVED BY A CARTER-DAY DUST COLLECTOR

## PERMIT UNIT REQUIREMENTS

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1. Visible emissions from truck or railcar loading operations shall be less than 20% opacity. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Particulate matter emissions from the baghouse shall be no more than 0.002 grain/scf and 0.041 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
3. 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 NSR Rule] Federally Enforceable Through Title V Permit
4. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency based on the manufacturer's recommendation. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The flexible air suction hoses shall be used at all times during truck and railcar loading. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Visible emissions from the baghouse 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
9. Visible emissions from baghouse serving the bulk starch loadout shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. Dust collector system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
11. Dust collector 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 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. Records of quarterly checks of the pressure drop across the bags shall be maintained. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
13. Records of duct 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] 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. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070 and 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:** N-238-13-6

**EXPIRATION DATE:** 03/31/2009

**EQUIPMENT DESCRIPTION:**

ONE (1) GERM DRYER SERVED BY A CYCLONE, A DUCON TYPE L MODEL II PARTICULATE SCRUBBER, AND A PPC INDUSTRIES MODEL 616PFG SOX SCRUBBER.

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Each scrubber shall have an operational differential pressure gauge. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Each scrubber liquid supply (at inlet to scrubber) shall have an operational flow meter. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The scrubber sprays and/or nozzles shall be strictly maintained in optimum working condition. [District NSR Rule] Federally Enforceable Through Title V Permit
5. A minimum liquid to gas ratio of 4 gpm per 1,000 cfm shall be provided for each scrubber. Upon detecting any excursion, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [District NSR Rule and 40 CFR part 64] Federally Enforceable Through Title V Permit
6. The emissions from this unit shall be ducted to the control devices at all times that the equipment is in operation except for SOx scrubber maintenance. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Except for SOx scrubber maintenance, the SOx emissions shall not exceed 0.50 pounds per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
8. VOC emissions shall not exceed 1.90 pounds per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
9. PM10 emissions shall not exceed 0.62 pounds per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The exhaust gases may be bypassed through the bypass duct after the particulate scrubber and prior to the SOx scrubber in the event of SOx scrubber maintenance. [District NSR Rule] Federally Enforceable Through Title V Permit
11. The exhaust gases may be bypassed for a period not to exceed 200 hours per year for maintenance of the SOx scrubber. [District NSR Rule] Federally Enforceable Through Title V Permit
12. 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
13. 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

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

14. 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
15. Records shall be kept indicating the date and time and duration of time maintenance was performed such that the exhaust gases were bypassed from the SOx scrubber. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Records of the SOx scrubber liquid flow rate shall be observed and recorded weekly during operation of this unit. 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
17. Records of the PM10 particulate scrubber liquid flow rate shall be observed and recorded daily during operation of this unit. 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 and 40 CFR part 64] Federally Enforceable Through Title V Permit
18. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rule 1070 and District Rule 2520, 9.4.2 and 40 CFR part 64] 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: N-238-14-2

EXPIRATION DATE: 03/31/2009

## EQUIPMENT DESCRIPTION:

GERM TRANSFER AND STORAGE SERVED BY A CARTER-DAY BAGHOUSE, TYPE R-F

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## PERMIT UNIT REQUIREMENTS

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1. 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 NSR Rule] Federally Enforceable Through Title V Permit
2. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency based on the manufacturer's recommendation. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Particulate matter emissions from the baghouse shall be no more than 0.002 grains/scf and 0.043 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Visible emissions from the baghouse 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
7. Visible emissions from baghouse serving the germ transfer and storage shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. Dust collector system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
9. Dust collector 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 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. Records of quarterly checks of the pressure drop across the bags shall be maintained. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
11. Records of duct 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] Federally Enforceable Through Title V Permit
12. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070 and 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: N-238-15-2

EQUIPMENT DESCRIPTION:  
BULK GERM LOADOUT

EXPIRATION DATE: 03/31/2009

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## PERMIT UNIT REQUIREMENTS

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1. See facility-wide permit N-238-0 for the requirements applicable to this permit unit. [District Rule 2080] Federally Enforceable Through Title V Permit

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-238-16-2

**EXPIRATION DATE:** 03/31/2009

**EQUIPMENT DESCRIPTION:**

FILTER-AID RECEIVING AND STORAGE SERVED BY A CARTER-DAY BAGHOUSE, TYPE R-F

## PERMIT UNIT REQUIREMENTS

1. 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 NSR Rule] Federally Enforceable Through Title V Permit
2. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency based on the manufacturer's recommendation. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Particulate matter emissions from the baghouse shall be no more than 0.002 grain/scf and 0.01 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Visible emissions from the baghouse 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
7. Visible emissions from baghouse serving the filter-aid receiving and storage shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. Dust collector system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
9. Dust collector 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 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. Records of quarterly checks of the pressure drop across the bags shall be maintained. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
11. Records of duct 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] Federally Enforceable Through Title V Permit
12. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070 and 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:** N-238-17-2

**EXPIRATION DATE:** 03/31/2009

**EQUIPMENT DESCRIPTION:**

CARBON RECEIVING AND STORAGE SERVED BY A CARTER-DAY BAGHOUSE, MODEL 28 RE6

## PERMIT UNIT REQUIREMENTS

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1. 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 NSR Rule] Federally Enforceable Through Title V Permit
2. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency based on the manufacturer's recommendation. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Particulate matter emissions from the baghouse shall be no more than 0.002 grain/scf and 0.01 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Visible emissions from the baghouse 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
7. Visible emissions from baghouse serving the carbon receiving and storage shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. Dust collector system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
9. Dust collector 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 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. Records of quarterly checks of the pressure drop across the bags shall be maintained. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
11. 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] Federally Enforceable Through Title V Permit
12. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070 and 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:** N-238-18-4

**EXPIRATION DATE:** 03/31/2009

**EQUIPMENT DESCRIPTION:**

ONE (1) SOLAR TURBINE INCORPORATED CENTAUR 2800 KW (ISO) CONTINUOUS DUTY INDUSTRIAL GAS TURBINE GENERATOR AND A DELTA WASTE HEAT BOILER, MODEL 3L-227

## PERMIT UNIT REQUIREMENTS

1. Permittee shall comply in full with all applicable monitoring, recordkeeping, and reporting requirements of Rule 4001 (New Source Performance Standards, 40 CFR Part 60, Subpart GG). [District Rule 4001] Federally Enforceable Through Title V Permit
2. Permittee shall comply with all applicable requirements of Rule 4703. [District Rule 4703] Federally Enforceable Through Title V Permit
3. The turbine shall be fired on natural gas only. [District NSR Rule] Federally Enforceable Through Title V Permit
4. A minimum water to fuel ratio of 0.57 by weight shall be injected directly into the combustion chamber when operating at full load. [District NSR Rule and District Rule 4703] Federally Enforceable Through Title V Permit
5. During start-up and shut down the water to fuel injection ratio shall be maintained at a minimum of 0.57 by weight. [District NSR Rule and District Rule 4703] Federally Enforceable Through Title V Permit
6. The permittee shall maintain and operate a continuous monitoring system to monitor and record the fuel consumption and the ratio of water to fuel being fired in the turbine. [District Rule 4001 and District Rule 4703] Federally Enforceable Through Title V Permit
7. A flowmeter shall be installed at water injection system's water inlet to the turbine. The flow meter shall be equipped with flow totalizer. [District NSR Rule and District Rule 4703] Federally Enforceable Through Title V Permit
8. NOx emissions shall not exceed 35 ppmv at 15% O<sub>2</sub>. [District Rule 4703] Federally Enforceable Through Title V Permit
9. CO emissions shall not exceed 120 ppmv at 15% O<sub>2</sub>. [District Rule 4703] Federally Enforceable Through Title V Permit
10. Source testing to demonstrate compliance with NOx and CO emission limits shall be conducted not less than once every 12 months or as required by the District. [District NSR Rule, District Rule 1081 and District Rule 4703] Federally Enforceable Through Title V Permit
11. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
12. NOx concentrations shall be determined using EPA Method 7E or 20 [District Rule 4703] Federally Enforceable Through Title V Permit
13. CO concentrations shall be determined using EPA Method 10 or 10B. [District Rule 4703] Federally Enforceable Through Title V Permit
14. O<sub>2</sub> concentrations shall be determined using EPA Methods 3, 3A, or 20. [District Rule 4703] 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.

15. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
16. {2352} The owner or operator shall install, operate and maintain in calibration a system which continuously measures and records: control system operating parameters, elapsed time of operation of the turbine, and the fuel consumption and the ratio of water to fuel being fired in the turbine. [40 CFR 60.334(a)] Federally Enforceable Through Title V Permit
17. {2255} The owner or operator shall be required to conform to the compliance testing and sampling procedures described in District Rule 1081 (as amended 12/16/93). [District Rule 1081] Federally Enforceable Through Title V Permit
18. {2256} Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.1] Federally Enforceable Through Title V Permit
19. Sulfur compound emissions shall not exceed 0.015% by volume, 150 ppmv, on a dry basis averaged over 15 consecutive minutes. [40 CFR 60.333(a)] Federally Enforceable Through Title V Permit
20. {2258} This unit shall be fired exclusively on PUC-quality natural gas which has a sulfur content of less than or equal to 0.017% by weight. [40 CFR 60.333(b); County Rules 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus County)] Federally Enforceable Through Title V Permit
21. If this unit is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [40 CFR 60.334(h)(1)] Federally Enforceable Through Title V Permit
22. {2261} If this unit is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the turbine shall be determined using ASTM method D 1072, D 4084 or D 3246. [40 CFR 60.335(d)] Federally Enforceable Through Title V Permit
23. {2262} If this unit is fired on PUC-regulated natural gas, then maintain on file copies of natural gas bills. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
24. Transitional Operation Period shall be defined as any of the following periods: bypass transition period, primary re-ignition period, reduced load period, start-up or shutdown. [District Rule 4703, 3.33] Federally Enforceable Through Title V Permit
25. Reduced Load Period shall be defined as the time during which a gas turbine is operated at less than rated capacity in order to change the exhaust gas diverter gate not exceeding one hour. [District Rule 4703, 3.23] Federally Enforceable Through Title V Permit
26. Start-up shall be defined as the period of time during which a unit is brought from a shutdown status to its operating temperature and pressure, including the time required by the unit's emission control system to reach full operation. [District Rule 4703] Federally Enforceable Through Title V Permit
27. Shutdown shall be defined as the period of time during which a unit is taken from an operational to a non-operational status by allowing it to cool down from its operating temperature to ambient temperature as the fuel supply to the unit is completely turned off. [District Rule 4703] Federally Enforceable Through Title V Permit
28. The duration of each startup or shutdown shall not exceed two hours. [District Rule 4703] Federally Enforceable Through Title V Permit
29. The emission control systems shall be in operation and emissions shall be minimized insofar as technologically feasible during each transitional operation period. [District Rule 4703] 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.

30. The owner or operator shall report periods of excess emissions that are defined as follows: any one-hour period during which the average water-to-fuel ratio, as measured by the continuous monitoring system, falls below the water-to-fuel ratio determined to demonstrate compliance with the NO<sub>x</sub> emission limit. Each report shall include the average water-to-fuel ratio, average fuel consumption, ambient conditions, and gas turbine load. [40 CFR 60.334(j)] Federally Enforceable Through Title V Permit
31. The continuous monitor of fuel, water, and water-to-fuel ratio system shall be used to determine the fuel consumption and the water-to-fuel ratio necessary to comply with the NO<sub>x</sub> emission limits at 30, 50, 75, and 100% of peak load or at four points in the normal operating range of the gas turbine, including the minimum point in the range and peak load. All loads shall be corrected to ISO conditions using the appropriate equations supplied by the manufacturer. [40 CFR 60.335(b)] Federally Enforceable Through Title V Permit
32. {2268} The owner or operator shall provide source test information annually regarding the exhaust gas NO<sub>x</sub> and CO concentration corrected to 15% O<sub>2</sub> (dry). EPA Methods 7E or 20 shall be used for NO<sub>x</sub> emissions. EPA Methods 10 or 10B shall be used for CO emissions. EPA Methods 3, 3A, or 20 shall be used for Oxygen content of the exhaust gas. [40 CFR 60.8(a) and District Rule 4703, 5.1, 6.3.1, 6.4.1, 6.4.2, and 6.4.3] Federally Enforceable Through Title V Permit
33. {2270} All continuous monitoring systems and monitoring devices shall be installed and operational prior to conducting performance tests. Verification of operational status shall, as a minimum, include completion of the manufacturer's written requirements or recommendations for installation, operation, and calibration of the device. [40 CFR 60.13(b)] Federally Enforceable Through Title V Permit
34. {2353} Results of continuous monitoring system shall be averaged over a three hour period, using consecutive 15-minute sampling periods in accordance with either EPA Method 7E or EPA Method 20 for NO<sub>x</sub>, EPA Test Methods 10 or 10B for CO, or EPA Methods 3, 3A, or 20 for O<sub>2</sub>. [40 CFR 60.335(c)(3) and 60.13 and District Rule 4703, 5.1, 6.4] Federally Enforceable Through Title V Permit
35. The owner or operator shall not operate the gas turbine under load conditions, excluding the transitional operation period, which results in the measured CO emissions concentration exceeding 200 ppmv @ 15% O<sub>2</sub>. [District Rule 4703, 5.2] Federally Enforceable Through Title V Permit
36. {2279} Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: Rules 108.1 (Fresno, Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus), and 110 (Madera) as of the date of permit issuance. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
37. {2280} Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: Rules 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus) as of the date of permit issuance. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
38. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: 40 CFR 60.332(a), (a)(1), (a)(2), (b), and (f), 60.333 (a) and (b). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
39. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: 40 CFR 60.7(b); District Rule 1081 (as amended 12/16/93) as of the date of permit issuance. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. Permittee shall maintain records of the occurrence and duration of any start-up or shutdown. [District Rule 4703] Federally Enforceable Through Title V Permit
41. The owner or operator shall maintain a stationary gas turbine operating log that includes, on a daily basis, the actual local start-up and stop time, length and reason for reduced load periods, total hours of operation, type and quantity of fuel used. [40 CFR 60.332(a) and (b) and District Rule 4703, 6.2.6] Federally Enforceable Through Title V Permit
42. {2271} The owner or operator of a stationary gas turbine system shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] 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.

43. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070 and 4703] 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: N-238-19-4

EXPIRATION DATE: 03/31/2009

**EQUIPMENT DESCRIPTION:**

ONE (1) 12,000 GALLON ABOVE GROUND SALT SLURRY STORAGE TANK

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**PERMIT UNIT REQUIREMENTS**

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1. Visible emissions from the vent of the salt storage tank shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The quantity of salt received shall not exceed 60,000 pounds during any one day and shall not exceed 120,000 pounds during any one month. [District NSR Rule] Federally Enforceable Through Title V Permit
3. PM10 emission rate shall not exceed 0.003 pounds per ton of salt received. [District NSR Rule] Federally Enforceable Through Title V Permit
4. A minimum of 7.7 gpm of water shall be added during transfer of the salt from the trucks to the storage tank. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Permittee shall maintain a daily record of the date and quantity of salt received. [District NSR Rule] Federally Enforceable Through Title V Permit
6. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rule 1070 and 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:** N-238-24-6

**EXPIRATION DATE:** 03/31/2009

**EQUIPMENT DESCRIPTION:**

FIRST GRIND OVERFLOW TANK SERVED BY A PPC INDUSTRIES MODEL 616PFG SOX SCRUBBER AND A BIOTON MODEL 2-2-34 BIOFILTER (THE CONTROL EQUIPMENT ALSO SERVES N-238-33)

## PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Each scrubber shall have an operational differential pressure gauge. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Each scrubber liquid supply (at inlet to scrubber) shall have an operational flow meter. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The scrubber sprays and/or nozzles shall be strictly maintained in optimum working condition. [District NSR Rule and 40 CFR Part 64] Federally Enforceable Through Title V Permit
5. A minimum liquid to gas ratio of 4 gpm per 1,000 cfm shall be provided for each scrubber. [District NSR Rule and 40 CFR Part 64] Federally Enforceable Through Title V Permit
6. If the liquid to gas ratio of the scrubber is less than 4 gpm per 1,000 cfm during operation, the permittee shall correct the liquid to gas ratio to a minimum of 4 gpm per 1,000 cfm as soon as possible, but no longer than 1 hour of operation after detection. If the liquid to gas ratio continues to be less than 4 gpm per 1,000 cfm after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. [40 CFR Part 64] Federally Enforceable Through Title V Permit
7. The emissions from this unit shall be ducted to the control devices at all times that the equipment is in operation except for SOx scrubber and biofilter maintenance or a complete biofilter bed change out. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Except for SOx scrubber and biofilter maintenance, or a complete biofilter bed change out, the combined SOx emissions from the equipment operating under Permits to Operate N-238-33 and N-238-24 shall not exceed 1.25 pounds per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Except for SOx scrubber and biofilter maintenance, or a complete biofilter bed change out, the combined VOC emissions from the equipment operating under Permits to Operate N-238-33 and N-238-24 shall not exceed 0.33 pounds per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The exhaust gases may be bypassed through the bypass duct prior to the SOx scrubber in the event of SOx scrubber or biofilter maintenance, or for complete biofilter bed change out. [District NSR Rule] Federally Enforceable Through Title V Permit
11. The exhaust gases may be bypassed for a period not to exceed 200 hours per year for maintenance of the SOx scrubber or the biofilter. [District NSR Rule] Federally Enforceable Through Title V Permit
12. The exhaust gases may be bypassed for a period not to exceed 340 hours per year for the complete biofilter bed change out. [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.

13. During operation the biofilter temperature shall not exceed 110 degrees F and shall not be less than 60 degrees F. [40 CFR part 64] Federally Enforceable Through Title V Permit
14. The temperature of the air flow through the biofilter media shall be monitored daily during operation. [40 CFR part 64] Federally Enforceable Through Title V Permit
15. The temperature gauge (probe) monitoring the air flow through the biofilter media shall be maintained per manufacturer's recommendations. [40 CFR part 64] Federally Enforceable Through Title V Permit
16. Biofilter shall be thoroughly inspected annually for biofilter media deterioration, and shall be replaced or repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
17. Records of the SOx scrubber liquid flow rate shall be observed and recorded daily during operation of this unit. 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 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
18. Records of the biofilter temperature shall be observed and recorded daily, during operation of this unit. 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 and 40 CFR part 64] Federally Enforceable Through Title V Permit
19. Records shall be kept indicating the date and time and duration of time maintenance was performed such that the exhaust gases were bypassed from the SOx scrubber and the biofilter or when a complete biofilter bed change out was performed. [District NSR Rule] Federally Enforceable Through Title V Permit
20. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7 for the scrubbers. [40 CFR Part 64] Federally Enforceable Through Title V Permit
21. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR Part 64.9 for the scrubbers. [40 CFR Part 64] Federally Enforceable Through Title V Permit
22. If the District or EPA determines per 40 CFR 64.7(d)(2) that a Quality Improvement Plan is required, 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
23. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rule 1070 and District Rule 2520, 9.4.2 and 40 CFR part 64] 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:** N-238-25-4

**EXPIRATION DATE:** 03/31/2009

**EQUIPMENT DESCRIPTION:**

GLUTEN DEWATERING FILTER AND VACUUM SYSTEMS WITH A SOX SCRUBBER ON THE EXHAUST STREAM

## PERMIT UNIT REQUIREMENTS

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1. The scrubber sprays and/or nozzles shall be strictly maintained in optimum working condition. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The pH of the scrubbing liquid shall be maintained at 6.5 or greater with a purge flow rate of 6.0 gallons per minute. A continuous monitoring device shall be installed and maintained to measure the pH of the scrubbing liquid. [District NSR Rule] Federally Enforceable Through Title V Permit
3. A minimum liquid to gas ratio of 17.7 gpm per 1,000 cfm shall be provided for this scrubber or the liquid recirculation rate shall be at least 230 gpm for sufficient contact. [District NSR Rule] Federally Enforceable Through Title V Permit
4. A liquid flow meter to monitor the liquid recirculation flow rate shall be installed and maintained in proper working order. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The SOx emissions shall not exceed 0.146 pounds per hour while the exhaust gases are passed through the SOx scrubber. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The SOx emissions shall not exceed 0.250 pounds per hour while the exhaust gases are bypassed from the SOx scrubber during scrubber maintenance. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The VOC emissions shall not exceed 2.083 pounds per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The exhaust gases may be bypassed around the SOx scrubber in the event of SOx scrubber maintenance for a period not to exceed 48 hours per year. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Liquid flow meter shall be observed and recorded weekly during operation of this unit. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. Records shall be kept indicating the date and time and duration of time maintenance was performed such that the exhaust gases were bypassed around the SOx scrubber. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Records of the SOx scrubber liquid flow rate shall be observed and recorded weekly during operation of this unit. 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
12. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rule 1070 and 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:** N-238-29-3

**EXPIRATION DATE:** 03/31/2009

**EQUIPMENT DESCRIPTION:**

SULFUROUS ACID PLANT CONSISTING OF: AN ELEMENTAL SULFUR BURNER AND TWO ABSORBERS VENTED TO A LUNDBERG SCRUBBER WITH A MIST ELIMINATOR; TWELVE STEEP TANKS (69,000 GAL. EACH) AND ONE DRAW TANK VENTED TO THE LINDBERG SCRUBBER SERVING THE ACID PLANT

## PERMIT UNIT REQUIREMENTS

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1. Scrubber sprays and/or nozzles shall be maintained in optimum working condition. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The scrubber and the scrubber fluid shall be maintained such that the scrubber provides at least 99% control of the SO<sub>2</sub> emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The mist eliminator shall be properly maintained and must be operating during the sulfurous acid production process. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The sulfur dioxide (SO<sub>2</sub>) emissions concentration shall not exceed 0.7 pounds per ton of elemental sulfur burned in the sulfur burner. [District NSR Rule] Federally Enforceable Through Title V Permit
5. No more than 6,000 pounds of elemental sulfur shall be burned in the sulfur burner during any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [District Rule 4801] Federally Enforceable Through Title V Permit
7. Records of the daily amount of elemental sulfur burned shall be kept on the premises. Records shall be maintained for a period of at least five years and shall be made available for District inspection upon request. [District Rules 2201 and 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:** N-238-30-2

**EXPIRATION DATE:** 03/31/2009

**EQUIPMENT DESCRIPTION:**

SODA ASH RECEIVING AND STORAGE WITH ONE (1) 60,000 GALLON STORAGE TANK SERVED BY A DUCON MULTIVANE WET SCRUBBER (TYPE L, SIZE 18).

## PERMIT UNIT REQUIREMENTS

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1. There shall be no visible emissions from the scrubber. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The scrubber shall have operational differential pressure indicator. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Scrubber sprays and/or nozzles shall be maintained in optimum working condition. [District NSR Rule] Federally Enforceable Through Title V Permit
4. All emissions from soda ash slurry storage tank shall be vented through the scrubber. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The PM10 emission concentration shall not exceed 0.002 lbs per ton of material received. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The maximum amount of material received shall not exceed 54 tons in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Daily records of the amount of material received shall be maintained, retained on the premises for a minimum of five years, and made available for District inspection upon request. [District Rules 2201 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
8. Records of the PM10 scrubber pressure differential shall be observed and recorded weekly during soda ash unloading. 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: N-238-33-2

EXPIRATION DATE: 03/31/2009

## EQUIPMENT DESCRIPTION:

DAVENPORT, MODEL RSTD, GLUTEN DRYER SERVED BY A CYCLONE, A PARTICULATE MATTER SCRUBBER, A PPC INDUSTRIES MODEL 616PFG SOX SCRUBBER, AND A BIOTON MODEL 2-2-34 BIOFILTER (THE SOX & VOC CONTROLS ARE SHARED WITH PERMIT N-238-24)

## PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Each scrubber shall have an operational differential pressure gauge. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Each scrubber liquid supply (at inlet to scrubber) shall have an operational flow meter. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The scrubber sprays and/or nozzles shall be strictly maintained in optimum working condition. [District NSR Rule and 40 CFR Part 64] Federally Enforceable Through Title V Permit
5. A minimum liquid to gas ratio of 4 gpm per 1,000 cfm shall be provided for each scrubber. [District NSR Rule and 40 CFR Part 64] Federally Enforceable Through Title V Permit
6. If the liquid to gas ratio of the scrubber is less than 4 gpm per 1,000 cfm during operation, the permittee shall correct the liquid to gas ratio to a minimum of 4 gpm per 1,000 cfm as soon as possible, but no longer than 1 hour of operation after detection. If the liquid to gas ratio continues to be less than 4 gpm per 1,000 cfm after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. [40 CFR Part 64] Federally Enforceable Through Title V Permit
7. The emissions from this unit shall be ducted to the control devices at all times that the equipment is in operation except for SOx scrubber and biofilter maintenance or a complete biofilter bed change out. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Except for SOx scrubber and biofilter maintenance, or a complete biofilter bed change out, the combined SOx emissions from the equipment operating under Permits to Operate N-238-33 and N-238-24 shall not exceed 1.25 pounds per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Except for SOx scrubber and biofilter maintenance, or a complete biofilter bed change out, the combined VOC emissions from the equipment operating under Permits to Operate N-238-33 and N-238-24 shall not exceed 0.33 pounds per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
10. PM10 emissions shall not exceed 1.04 pounds per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
11. The exhaust gases may be bypassed through the bypass duct after the particulate scrubber and prior to the SOx scrubber in the event of SOx scrubber or biofilter maintenance, or for complete biofilter bed change out. [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. The exhaust gases may be bypassed for a period not to exceed 200 hours per year for maintenance of the SOx scrubber or the biofilter. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The exhaust gases may be bypassed for a period not to exceed 340 hours per year for the complete biofilter bed change out. [District NSR Rule] Federally Enforceable Through Title V Permit
14. The District shall be notified of any breakdown conditions in accordance with Rule 1100 (Equipment Breakdown). [District Rule 1100]
15. During operation the biofilter temperature shall not exceed 110 degrees F and shall not be less than 60 degrees F. [40 CFR part 64] Federally Enforceable Through Title V Permit
16. The temperature of the air flow through the biofilter media shall be monitored daily during operation. [40 CFR part 64] Federally Enforceable Through Title V Permit
17. The temperature gauge (probe) monitoring the air flow through the biofilter media shall be maintained per manufacturer's recommendations. [40 CFR part 64] Federally Enforceable Through Title V Permit
18. Biofilter shall be thoroughly inspected annually for biofilter media deterioration and shall be replaced or repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
19. Records shall be kept indicating the date and time and duration of time maintenance was performed such that the exhaust gases were bypassed from the SOx scrubber and the biofilter or when a complete biofilter bed change out was performed. [District NSR Rule] Federally Enforceable Through Title V Permit
20. Records of the SOx scrubber liquid flow rate shall be observed and recorded daily during operation of this unit. 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 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
21. Records of the PM10 particulate scrubber liquid flow rate shall be observed and recorded daily during operation of this unit. 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 and 40 CFR part 64] Federally Enforceable Through Title V Permit
22. Records of the biofilter temperature shall be observed and recorded daily, during operation of this unit. 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 and 40 CFR part 64] Federally Enforceable Through Title V Permit
23. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7 for the scrubbers. [40 CFR Part 64] Federally Enforceable Through Title V Permit
24. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR Part 64.9 for the scrubbers. [40 CF Part 64] Federally Enforceable Through Title V Permit
25. If the District or EPA determines per 40 CFR 64.7(d)(2) that a Quality Improvement Plan is required, 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
26. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rule 1070 and District Rule 2520, 9.4.2 and 40 CFR part 64] 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

Previous Title V Operating Permit

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# Permit to Operate

**FACILITY:** N-238

**EXPIRATION DATE:** 03/31/2009

**LEGAL OWNER OR OPERATOR:**

CORN PRODUCTS INTERNATIONAL

**MAILING ADDRESS:**

PO BOX 6129  
STOCKTON, CA 95206-0129

**FACILITY LOCATION:**

1021 INDUSTRIAL DR  
STOCKTON, CA 95206

**FACILITY DESCRIPTION:**

GRAIN MILLING AND PROCESSING - WET CORN MILLING

The Facility's Permit to Operate may include Facility-wide Requirements as well as requirements that apply to specific permit units.

This Permit to Operate remains valid through the permit expiration date listed above, subject to payment of annual permit fees and compliance with permit conditions and all applicable local, state, and federal regulations. This permit is valid only at the location specified above, and becomes void upon any transfer of ownership or location. Any modification of the equipment or operation, as defined in District Rule 2201, will require prior District approval. This permit shall be posted as prescribed in District Rule 2010.

**Seyed Sadredin**  
Executive Director / APCO

**David Warner**  
Director of Permit Services

# San Joaquin Valley Air Pollution Control District

FACILITY: N-238-0-1

EXPIRATION DATE: 03/31/2009

## FACILITY-WIDE REQUIREMENTS

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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: CORN PRODUCTS INTERNATIONAL  
Location: 1021 INDUSTRIAL DR, STOCKTON, CA 95206  
N-238-0-1: Apr 8 2010 4:13PM -- SANDHUG

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. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
42. Particulate matter (PM) emissions from the entire facility shall not exceed 25 pounds per hour or 250 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
43. The PM10 limit from the entire facility shall not exceed 200 pounds per day. [District NSR Rule] Federally Enforceable Through Title V Permit
44. On December 31, 2004, the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report are based upon this initial permit issuance date, 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] 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:** N-238-1-1

**EXPIRATION DATE:** 03/31/2009

**EQUIPMENT DESCRIPTION:**

CORN RECEIVING AND STORAGE CONSISTING OF: RECEIVING PITS, VARIOUS CONVEYING EQUIPMENT, AND THREE HOPPERS ALL VENTED TO A CARTER-DAY MODEL 376-RF8 BAGHOUSE; AND TWO STORAGE BINS EACH EQUIPPED WITH A BIN VENT FILTER.

## PERMIT UNIT REQUIREMENTS

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1. 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 NSR Rule] Federally Enforceable Through Title V Permit
2. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency based on the manufacturer's recommendation. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Particulate matter emissions from each baghouse shall not exceed 0.002 grains/dscf in concentration. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Particulate matter emissions from unloading shall not exceed 0.6 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Particulate matter emissions from silos 1 and 2 shall not exceed 0.6 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Records of quarterly checks of the pressure drop across the bags shall be maintained. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
9. The owner/operator shall check for visible emissions on a daily basis. If any particulate matter emissions are visible, the baghouse and bin vent filter shall be inspected for any tears, abrasions, or holes in the fabric. Any defective or damaged material shall be repaired or replaced. [District Rules 4201, 4202, 2520 Section 9.3.2 and 40 CFR part 64] Federally Enforceable Through Title V Permit
10. Visible emissions from each baghouse shall be evaluated using EPA method 22 for a period of at least 6 minutes at least once during each day the baghouse is operated. 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 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
11. Baghouse and bin vent filter shall be inspected at least quarterly when the unit is 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 and 40 CFR part 64] 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. Visible emissions from baghouse serving the hoppers shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
13. Records of baghouse and bin vent filter 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 and 40 CFR part 64] Federally Enforceable Through Title V Permit
14. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rule 1070 and 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:** N-238-2-1

**EXPIRATION DATE:** 03/31/2009

**EQUIPMENT DESCRIPTION:**

CORN CLEANING OPERATION WITH: THREE DRAG CONVEYORS AND ONE ELEVATOR VENTED TO A BIN FILTER; ASPERATED CORN CLEANER, TWO HOPPERS, AND VARIOUS CONVEYORS VENTED TO A CARTER-DAY BAGHOUSE; AND ONE CORN CLEANINGS HOPPER VENTED TO A CARTER-DAY BAGHOUSE.

## PERMIT UNIT REQUIREMENTS

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1. 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 NSR Rule] Federally Enforceable Through Title V Permit
2. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency based on the manufacturer's recommendation. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Particulate matter emissions from each baghouse shall not exceed 0.002 grains/dscf. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Particulate matter emissions from the elevator shall not exceed 0.017 pounds in any one hour. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Particulate matter emissions from cleaning shall not exceed 0.175 pounds in any one hour. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Particulate matter emissions from the cleaning silo shall not exceed 0.014 pounds in any one hour. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Visible emissions from the baghouse 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 within 48 hours. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. Dust collector system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
11. Dust collector 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 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. Visible emissions from baghouse serving the conveyors shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2520, 9.3.2] 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.

13. Records of baghouse and bin vent filter 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
14. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rule 1070 and 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:** N-238-8-1

**EXPIRATION DATE:** 03/31/2009

**EQUIPMENT DESCRIPTION:**

GLUTEN MILLING, TRANSFER, AND STORAGE SERVED BY A CARTER-DAY DUST COLLECTOR, TYPE R-F.

## PERMIT UNIT REQUIREMENTS

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1. 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 NSR Rule] Federally Enforceable Through Title V Permit
2. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency based on the manufacturer's recommendation. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Particulate matter emissions from the baghouse shall be no more than 0.002 grain/scf and 0.036 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Records of quarterly checks of the pressure drop across the bags shall be maintained. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
7. Visible emissions from the baghouse 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
8. Visible emissions from baghouse serving the gluten milling, transfer and storage shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
9. Dust collector system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. Dust collector 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 2520, 9.3.2] Federally Enforceable Through Title V Permit
11. Records of duct 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] Federally Enforceable Through Title V Permit
12. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rule 1070 and 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:** N-238-9-3

**EXPIRATION DATE:** 03/31/2009

**EQUIPMENT DESCRIPTION:**

BULK GLUTEN LOADOUT SYSTEM WITH A STATIONARY HOOD AND A W.W. SLY, MODEL XP-10, RETRACTABLE LOADING SPOUT SERVED BY A ALANCO, MODEL 378-RLP-FILTER, BAGHOUSE.

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
2. The baghouse shall be equipped with an operational pressure differential gauge to indicate the pressure drop across the bags. [District NSR Rule]
3. Visible emissions from the baghouse serving the gluten meal loadout operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Material removed from baghouse shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Replacement bags numbering at least 10% of the total number of bags in the baghouse using each type of bag shall be maintained on the premises. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District NSR Rule] Federally Enforceable Through Title V Permit
7. All ducting from the loading spout to the baghouse shall be properly maintained to prevent fugitive dust emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
8. PM10 emissions shall not exceed 0.004 pounds per ton of material processed. [District NSR Rule] Federally Enforceable Through Title V Permit
9. The quantity of material processed by the gluten meal loadout system shall not exceed 150 tons in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
10. A record of the daily amount of material processed by the system shall be kept on the premises at all times and shall be made available for the District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
11. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rule 1070 and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
12. Records of quarterly checks of the pressure drop across the bags shall be maintained. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
13. Visible emissions from the baghouse 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
14. Dust collector system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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15. Dust collector 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 2520, 9.3.2] Federally Enforceable Through Title V Permit
16. Records of duct 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] 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:** N-238-10-9

**EXPIRATION DATE:** 03/31/2009

**EQUIPMENT DESCRIPTION:**

STARCH FLASH DRYER EQUIPPED WITH A 21 MMBTU/HR COEN QLN BURNER AND TWO STARCH RECOVERY CYCLONES SERVED BY TWO DUCON MULTIVANE GAS SCRUBBERS TYPE L MODEL II

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [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. Exhaust from the turbine and heat recovery boiler unit permitted under N-238-18 may be vented to the starch dryer. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Emissions from the turbine and heat recovery boiler unit permitted under N-238-18 are not accounted for in the permitted emission limits for the starch dryer. [District Rule 2201] Federally Enforceable Through Title V Permit
5. NOx emissions from the starch dryer shall not exceed 4.3 ppmvd @ 19% O2 referenced as NO2. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
6. CO emissions from the starch dryer shall not exceed 42 ppmvd @ 19% O2. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
7. SOx emissions from the starch dryer burner shall not exceed 0.00285 lb/MMBtu. [District Rule 2201] Federally Enforceable Through Title V Permit
8. PM10 emissions from the starch dryer shall not exceed 0.24 pounds per ton of starch dried. [District Rule 2201] Federally Enforceable Through Title V Permit
9. No more than 320 tons of starch shall be dried in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. VOC emissions from the starch dryer shall not exceed 20 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Each scrubber shall be equipped with an operational differential pressure gauge to measure the pressure drop across the scrubber (i.e. outlet and inlet sections of the scrubber). [District Rule 2201, 40 CFR Part 64] Federally Enforceable Through Title V Permit
12. The differential pressure across each scrubber shall not exceed 10.0 inches of water column. Upon detecting any excursion, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [District Rule 2520, 40 CFR Part 64] Federally Enforceable Through Title V Permit
13. Each scrubber liquid supply shall have an operational pressure gauge at the inlet to the scrubber. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
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14. The scrubber sprays and/or nozzles shall be maintained in optimum working condition and shall be inspected at least once every 12 months. A record of the date of inspection, identification of the equipment, identification of the individual performing the inspection, and any corrective action taken shall be maintained on site. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Each scrubber shall be equipped with an operational liquid flow meter. [40 CFR Part 64] Federally Enforceable Through Title V Permit
16. For each scrubber, the liquid recirculation flow rate shall not be less than 83 gallons per minute (equivalent to 3 gpm/1,000 cfm for each fan rated at 27,500 cfm). Upon detecting any excursion, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [District Rule 2201, 40 CFR Part 64] Federally Enforceable Through Title V Permit
17. There shall be no leaks from the by-pass stacks. [District Rule 2201] Federally Enforceable Through Title V Permit
18. The starch dryer shall be fired exclusively on PUC-quality natural gas. [District Rule 2201] Federally Enforceable Through Title V Permit
19. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 4309] Federally Enforceable Through Title V Permit
20. Source testing to measure NO<sub>x</sub> and CO emissions from the starch dryer shall be conducted at least once every twenty-four months. Source testing shall be conducted when the exhaust from the turbine and waste heat recovery boiler unit permitted under N-238-18 is not being vented to the starch dryer. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
21. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rule 4309] Federally Enforceable Through Title V Permit
22. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis. [District Rule 4309] Federally Enforceable Through Title V Permit
23. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
24. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rule 4309] Federally Enforceable Through Title V Permit
25. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
26. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
27. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications given in District Policy SSP-3005 (Emissions Monitoring for Rule 4309) or approved by the APCO. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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28. If either the NO<sub>x</sub> or CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rule 4309] Federally Enforceable Through Title V Permit
29. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309] Federally Enforceable Through Title V Permit
30. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range [District Rule 4309] Federally Enforceable Through Title V Permit
31. All test results for NO<sub>x</sub> and CO shall be reported in ppmv @ 19% O<sub>2</sub> (or no correction if measured above 19% O<sub>2</sub>), corrected to dry stack conditions. [District Rule 4309] Federally Enforceable Through Title V Permit
32. A daily log containing total hours of operation, type and quantity of fuel used and the amount of starch processed shall be kept on the premises, and shall be made available for District inspection upon request. [District Rules 2201 and 4309] Federally Enforceable Through Title V Permit
33. Sulfur compound emissions shall not exceed 0.2% by volume, 2,000 ppmv, on a dry basis averaged over 15 consecutive minutes. [County Rules 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus)] Federally Enforceable Through Title V Permit
34. This unit shall be fired exclusively on PUC-quality natural gas which has a sulfur content of less than or equal to 0.017% by weight. [County Rules 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus County)] Federally Enforceable Through Title V Permit
35. Scrubber liquid recirculation rate (gpm) through each scrubber, and differential pressure across each scrubber (inches of water column) shall be observed and recorded at least once a day while the dryer is in operation. The records shall include date of inspection, identification of the equipment, identification of the individual performing the inspection, and the corrective action taken. [District Rule 2520, 9.4.2 and 40 CFR part 64] Federally Enforceable Through Title V Permit
36. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7 for the scrubbers. [40 CFR Part 64] Federally Enforceable Through Title V Permit
37. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR Part 64.9 for the scrubbers. [40 CFR Part 64] Federally Enforceable Through Title V Permit
38. If the District or EPA determines per 40 CFR 64.7(d)(2) that a Quality Improvement Plan is required, 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
39. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rules 1070, 2520, 9.4.2 and 4309 and 40 CFR part 64] Federally Enforceable Through Title V Permit

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-238-11-2

**EXPIRATION DATE:** 03/31/2009

**EQUIPMENT DESCRIPTION:**

STARCH TRANSFER AND STORAGE SERVED BY A CARTER-DAY DUST COLLECTOR, TYPE R-F.

## PERMIT UNIT REQUIREMENTS

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1. Visible emissions from truck or railcar loading operations shall be less than 20% opacity. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Particulate matter emissions from the baghouse shall be no more than 0.002 grain/scf and 0.041 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
3. 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 NSR Rule] Federally Enforceable Through Title V Permit
4. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency based on the manufacturer's recommendation. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The flexible air suction hoses shall be used at all times during truck and railcar loading. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Records of quarterly checks of the pressure drop across the bags shall be maintained. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
9. Visible emissions from the baghouse 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
10. Visible emissions from baghouse serving the starch transfer and storage shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
11. Dust collector system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. Dust collector 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 2520, 9.3.2] Federally Enforceable Through Title V Permit
13. Records of duct 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] 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. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rule 1070 and 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:** N-238-12-1

**EXPIRATION DATE:** 03/31/2009

**EQUIPMENT DESCRIPTION:**

BULK STARCH LOADOUT SERVED BY A CARTER-DAY DUST COLLECTOR

## PERMIT UNIT REQUIREMENTS

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1. Visible emissions from truck or railcar loading operations shall be less than 20% opacity. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Particulate matter emissions from the baghouse shall be no more than 0.002 grain/scf and 0.041 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
3. 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 NSR Rule] Federally Enforceable Through Title V Permit
4. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency based on the manufacturer's recommendation. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The flexible air suction hoses shall be used at all times during truck and railcar loading. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Records of quarterly checks of the pressure drop across the bags shall be maintained. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
9. Visible emissions from the baghouse 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
10. Visible emissions from baghouse serving the bulk starch loadout shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
11. Dust collector system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. Dust collector 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 2520, 9.3.2] Federally Enforceable Through Title V Permit
13. Records of duct 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] 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. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rule 1070 and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-238-13-5

**EXPIRATION DATE:** 03/31/2009

**EQUIPMENT DESCRIPTION:**

ONE (1) GERM DRYER SERVED BY A CYCLONE, A DUCON TYPE L MODEL II PARTICULATE SCRUBBER, AND A PPC INDUSTRIES MODEL 616PFG SOX SCRUBBER.

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
2. Each scrubber shall have an operational differential pressure gauge. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Each scrubber liquid supply (at inlet to scrubber) shall have an operational flow meter. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The scrubber sprays and/or nozzles shall be strictly maintained in optimum working condition. [District NSR Rule] Federally Enforceable Through Title V Permit
5. A minimum liquid to gas ratio of 4 gpm per 1,000 cfm shall be provided for each scrubber. [District NSR Rule and 40 CFR part 64] Federally Enforceable Through Title V Permit
6. The emissions from this unit shall be ducted to the control devices at all times that the equipment is in operation except for SOx scrubber maintenance. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Except for SOx scrubber maintenance, the SOx emissions shall not exceed 0.50 pounds per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
8. VOC emissions shall not exceed 1.90 pounds per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
9. PM10 emissions shall not exceed 0.62 pounds per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The exhaust gases may be bypassed through the bypass duct after the particulate scrubber and prior to the SOx scrubber in the event of SOx scrubber maintenance. [District NSR Rule] Federally Enforceable Through Title V Permit
11. The exhaust gases may be bypassed for a period not to exceed 200 hours per year for maintenance of the SOx scrubber. [District NSR Rule] Federally Enforceable Through Title V Permit
12. Records shall be kept indicating the date and time and duration of time maintenance was performed such that the exhaust gases were bypassed from the SOx scrubber. [District NSR Rule] Federally Enforceable Through Title V Permit
13. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rule 1070 and District Rule 2520, 9.4.2 and 40 CFR part 64] Federally Enforceable Through Title V Permit
14. Records of the SOx scrubber liquid flow rate shall be observed and recorded weekly during operation of this unit. 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

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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15. Records of the PM10 particulate scrubber liquid flow rate shall be observed and recorded daily during operation of this unit. 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 and 40 CFR part 64] 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:** N-238-14-1

**EXPIRATION DATE:** 03/31/2009

**EQUIPMENT DESCRIPTION:**

GERM TRANSFER AND STORAGE SERVED BY A CARTER-DAY BAGHOUSE, TYPE R-F.

## PERMIT UNIT REQUIREMENTS

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1. 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 NSR Rule] Federally Enforceable Through Title V Permit
2. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency based on the manufacturer's recommendation. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Particulate matter emissions from the baghouse shall be no more than 0.002 grains/scf and 0.043 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Records of quarterly checks of the pressure drop across the bags shall be maintained. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
7. Visible emissions from the baghouse 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
8. Visible emissions from baghouse serving the germ transfer and storage shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
9. Dust collector system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. Dust collector 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 2520, 9.3.2] Federally Enforceable Through Title V Permit
11. Records of duct 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] Federally Enforceable Through Title V Permit
12. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rule 1070 and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-238-15-1

**EXPIRATION DATE:** 03/31/2009

**EQUIPMENT DESCRIPTION:**  
BULK GERM LOADOUT

## PERMIT UNIT REQUIREMENTS

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1. See facility-wide permit N-238-0 for the requirements applicable to this permit unit. [District Rule 2080] 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:** N-238-16-1

**EXPIRATION DATE:** 03/31/2009

**EQUIPMENT DESCRIPTION:**

FILTER-AID RECEIVING AND STORAGE SERVED BY A CARTER-DAY BAG HOUSE, TYPE R-F.

## PERMIT UNIT REQUIREMENTS

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1. 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 NSR Rule] Federally Enforceable Through Title V Permit
2. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency based on the manufacturer's recommendation. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Particulate matter emissions from the baghouse shall be no more than 0.002 grain/scf and 0.01 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Records of quarterly checks of the pressure drop across the bags shall be maintained. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
7. Visible emissions from the baghouse 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
8. Visible emissions from baghouse serving the filter-aid receiving and storage shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
9. Dust collector system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. Dust collector 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 2520, 9.3.2] Federally Enforceable Through Title V Permit
11. Records of duct 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] Federally Enforceable Through Title V Permit
12. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rule 1070 and 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:** N-238-17-1

**EXPIRATION DATE:** 03/31/2009

**EQUIPMENT DESCRIPTION:**

CARBON RECEIVING AND STORAGE SERVED BY A CARTER-DAY BAGHOUSE, MODEL 28 RF6.

## PERMIT UNIT REQUIREMENTS

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1. 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 NSR Rule] Federally Enforceable Through Title V Permit
2. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse using each type of bag shall be maintained on the premises. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency based on the manufacturer's recommendation. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Particulate matter emissions from the baghouse shall be no more than 0.002 grain/scf and 0.01 lb/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Records of quarterly checks of the pressure drop across the bags shall be maintained. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
7. Visible emissions from the baghouse 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
8. Visible emissions from baghouse serving the carbon receiving and storage shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
9. Dust collector system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
10. Dust collector 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 2520, 9.3.2] Federally Enforceable Through Title V Permit
11. 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] Federally Enforceable Through Title V Permit
12. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rule 1070 and 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:** N-238-18-3

**EXPIRATION DATE:** 03/31/2009

**EQUIPMENT DESCRIPTION:**

ONE (1) SOLAR TURBINE INCORPORATED CENTAUR 2800 KW (ISO) CONTINUOUS DUTY INDUSTRIAL GAS TURBINE GENERATOR AND A DELTA WASTE HEAT BOILER, MODEL 3L-227.

## PERMIT UNIT REQUIREMENTS

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1. Permittee shall comply in full with all applicable monitoring, recordkeeping, and reporting requirements of Rule 4001 (New Source Performance Standards, 40 CFR Part 60, Subpart GG). [District Rule 4001] Federally Enforceable Through Title V Permit
2. Permittee shall comply with all applicable requirements of Rule 4703. [District Rule 4703] Federally Enforceable Through Title V Permit
3. The turbine shall be fired on natural gas only. [District NSR Rule] Federally Enforceable Through Title V Permit
4. A minimum water to fuel ratio of 0.57 by weight shall be injected directly into the combustion chamber when operating at full load. [District NSR Rule and District Rule 4703] Federally Enforceable Through Title V Permit
5. During start-up and shut down the water to fuel injection ratio shall be maintained at a minimum of 0.57 by weight. [District NSR Rule and District Rule 4703] Federally Enforceable Through Title V Permit
6. The permittee shall maintain and operate a continuous monitoring system to monitor and record the fuel consumption and the ratio of water to fuel being fired in the turbine. [District Rule 4001 and District Rule 4703] Federally Enforceable Through Title V Permit
7. A flowmeter shall be installed at water injection system's water inlet to the turbine. The flow meter shall be equipped with flow totalizer. [District NSR Rule and District Rule 4703] Federally Enforceable Through Title V Permit
8. NOx emissions shall not exceed 35 ppmv at 15% O<sub>2</sub>. [District Rule 4703] Federally Enforceable Through Title V Permit
9. CO emissions shall not exceed 120 ppmv at 15% O<sub>2</sub>. [District Rule 4703] Federally Enforceable Through Title V Permit
10. Source testing to demonstrate compliance with NOx and CO emission limits shall be conducted not less than once every 12 months or as required by the District. [District NSR Rule, District Rule 1081 and District Rule 4703] Federally Enforceable Through Title V Permit
11. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
12. NOx concentrations shall be determined using EPA Method 7E or 20 [District Rule 4703] Federally Enforceable Through Title V Permit
13. CO concentrations shall be determined using EPA Method 10 or 10B. [District Rule 4703] Federally Enforceable Through Title V Permit
14. O<sub>2</sub> concentrations shall be determined using EPA Methods 3, 3A, or 20. [District Rule 4703] 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.

15. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
16. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
17. The owner or operator shall install, operate and maintain in calibration a system which continuously measures and records: control system operating parameters, elapsed time of operation of the turbine, and the fuel consumption and the ratio of water to fuel being fired in the turbine. [40 CFR 60.334(a)] Federally Enforceable Through Title V Permit
18. The owner or operator shall be required to conform to the compliance testing and sampling procedures described in District Rule 1081 (as amended 12/16/93). [District Rule 1081] Federally Enforceable Through Title V Permit
19. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201, 3.1] Federally Enforceable Through Title V Permit
20. Sulfur compound emissions shall not exceed 0.2% by volume, 2,000 ppmv, on a dry basis averaged over 15 consecutive minutes. [40 CFR 60.333(a); County Rules 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus)] Federally Enforceable Through Title V Permit
21. This unit shall be fired exclusively on PUC-quality natural gas which has a sulfur content of less than or equal to 0.017% by weight. [40 CFR 60.333(b); County Rules 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus County)] Federally Enforceable Through Title V Permit
22. If this unit is not fired on PUC-regulated natural gas, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be quarterly. If a test shows noncompliance with the sulfur content requirement, the source must return to weekly testing until eight consecutive weeks show compliance. [40 CFR 60.334(b)(2)] Federally Enforceable Through Title V Permit
23. If this unit is not fired on PUC-regulated natural gas, the operator shall submit a semiannual report listing any daily period during which the sulfur content of the fuel being fired in the gas turbine exceeds 0.8% by weight. [40 CFR 60.334(c)(2.)] Federally Enforceable Through Title V Permit
24. If this unit is not fired on PUC-regulated natural gas, then the sulfur content of the natural gas being fired in the turbine shall be determined using ASTM method D 1072, D 4084 or D 3246. [40 CFR 60.335(d)] Federally Enforceable Through Title V Permit
25. If this unit is fired on PUC-regulated natural gas, then maintain on file copies of natural gas bills. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
26. The owner or operator shall not exceed the following applicable Tier 1 NO<sub>x</sub> emission rate of: A. (If Rating <10 MW) 42 ppmvd @ 15% O<sub>2</sub>, excluding the thermal stabilization periods or reduced load periods; B. (If Rating 10 MW or greater) (9 x EFF / 25) ppmvd @ 15% O<sub>2</sub>, under load conditions, excluding thermal stabilization periods or reduced load periods, where EFF (efficiency) is the higher of EFF1 {100% x (3,412 Btu/kW-hr) / (Actual Heat Rate at HHV, Btu/kW-hr)} or EFF2 {EFFmfr x (LHV / HHV)} where actual heat rate is a ratio of the heat input to power output taking into account the manufacturer's listed turbine efficiency, HHV is the higher heating value of the fuel, LHV is the lower heating value of the fuel, and EFFmfr is the manufacturer's continuous rated percent efficiency of the gas turbine with air pollution equipment at LHV. An EFF that is less than 25 shall be assigned a value of 25. [40 CFR 60.332(a)(1) and (a)(2) District Rule 4703, 5.1.1] Federally Enforceable Through Title V Permit
27. Reduced Load Period shall be defined as the time during which a gas turbine is operated at less than rated capacity in order to change the exhaust gas diverter gate not exceeding one hour. [District Rule 4703, 3.19] Federally Enforceable Through Title V Permit
28. Thermal Stabilization Period shall be defined as the start up or shut down time during which the exhaust gas is not within the normal operating range, not to exceed two hours. [District Rule 4703, 3.25] 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.

29. The owner or operator shall report periods of excess emissions that are defined as follows: any one-hour period during which the average water-to-fuel ratio, as measured by the continuous monitoring system, falls below the water-to-fuel ratio determined to demonstrate compliance with the NO<sub>x</sub> emission limit. Each report shall include the average water-to-fuel ratio, average fuel consumption, ambient conditions, and gas turbine load. [40 CFR 60.334(c)(1)] Federally Enforceable Through Title V Permit
30. The continuous monitor of fuel, water, and water-to-fuel ratio system shall be used to determine the fuel consumption and the water-to-fuel ratio necessary to comply with the NO<sub>x</sub> emission limits at 30, 50, 75, and 100% of peak load or at four points in the normal operating range of the gas turbine, including the minimum point in the range and peak load. All loads shall be corrected to ISO conditions using the appropriate equations supplied by the manufacturer. [40 CFR 60.335(c)(2)] Federally Enforceable Through Title V Permit
31. The owner or operator shall provide source test information annually regarding the exhaust gas NO<sub>x</sub> and CO concentration corrected to 15% O<sub>2</sub> (dry). EPA Methods 7E or 20 shall be used for NO<sub>x</sub> emissions. EPA Methods 10 or 10B shall be used for CO emissions. EPA Methods 3, 3A, or 20 shall be used for Oxygen content of the exhaust gas. [40 CFR 60.8(a) and District Rule 4703, 5.1, 6.3.1, 6.4.1, 6.4.2, and 6.4.3] Federally Enforceable Through Title V Permit
32. All continuous monitoring systems and monitoring devices shall be installed and operational prior to conducting performance tests. Verification of operational status shall, as a minimum, include completion of the manufacturer's written requirements or recommendations for installation, operation, and calibration of the device. [40 CFR 60.13(b)] Federally Enforceable Through Title V Permit
33. The owner or operator of a stationary gas turbine system shall maintain all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
34. Results of continuous monitoring system shall be averaged over a three hour period, using consecutive 15-minute sampling periods in accordance with either EPA Method 7E or EPA Method 20 for NO<sub>x</sub>, EPA Test Methods 10 or 10B for CO, or EPA Methods 3, 3A, or 20 for O<sub>2</sub>. [40 CFR 60.335(c)(3) and 60.13 and District Rule 4703, 5.1, 6.4] Federally Enforceable Through Title V Permit
35. The owner or operator shall not operate the gas turbine under load conditions, excluding the thermal stabilization period or reduced load period, which results in the measured CO emissions concentration exceeding 200 ppmv @ 15% O<sub>2</sub>. [District Rule 4703, 5.2] Federally Enforceable Through Title V Permit
36. The owner or operator of any existing stationary gas turbine system (unless exempted because all turbines are under ownership or control and have NO<sub>x</sub> and CO emissions limits which are shown on the current Permit to Operate and which do not exceed the applicable Compliance Limits in Section 5.0) shall submit to the APCO for approval, an emissions control plan of all actions. The control plan shall include a schedule of increments of progress that will be taken to comply with the requirements of the applicable NO<sub>x</sub> Compliance Limit in Section 5.0 and Compliance Schedule in Section 7.0 of District Rule 4703 (as amended 4/25/02). [District Rule 4703, 6.1] Federally Enforceable Through Title V Permit
37. The owner or operator shall maintain a stationary gas turbine operating log that includes, on a daily basis, the actual local start-up and stop time, length and reason for reduced load periods, total hours of operation, type and quantity of fuel used. [40 CFR 60.332(a) and (b) and District Rule 4703, 6.2.6] Federally Enforceable Through Title V Permit
38. Any gas turbine with an intermittently operated auxiliary burner shall demonstrate compliance with the auxiliary burner both on and off. [40 CFR 60.335(b) and District Rule 4703, 6.3.3] Federally Enforceable Through Title V Permit
39. The HHV and LHV of the fuel combusted shall be determined using ASTM D3588, ASTM 1826, or ASTM 1945. [40 CFR 60.332(a) and (b) and District Rule 4703, 6.4.5] Federally Enforceable Through Title V Permit
40. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: Rules 108.1 (Fresno, Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus), and 110 (Madera) as of the date of permit issuance. A permit shield is granted from these requirements. [District Rule 2520, 13.2] 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.

41. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: Rules 404 (Madera), 406 (Fresno), and 407 (Kings, Merced, San Joaquin, Tulare, Kern, and Stanislaus) as of the date of permit issuance. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
42. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: 40 CFR 60.332(a), (a)(1), (a)(2), (b), and (f), 60.333 (a) and (b); 60.334(a), (b)(2), (c)(1), (c)(2), and (c)(3), and 60.335(b), (c)(2), (c)(3), and (d); District Rule 4703 (as amended 4/25/02), Sections 5.1.1, 5.2, 6.1, 6.3.1, 6.3.3, 6.4, 6.4.5, and 6.4.6 as of the date of permit issuance. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
43. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following applicable requirements: 40 CFR 60.7(b), 60.8, 60.8(d), 60.13, and 60.13(b); District Rule 1081 (as amended 12/16/93) as of the date of permit issuance. A permit shield is granted from these requirements. [District Rule 2520, 13.2] 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:** N-238-19-3

**EXPIRATION DATE:** 03/31/2009

**EQUIPMENT DESCRIPTION:**

ONE (1) 12,000 GALLON ABOVE GROUND SALT SLURRY STORAGE TANK.

## **PERMIT UNIT REQUIREMENTS**

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1. Visible emissions from the vent of the salt storage tank shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The quantity of salt received shall not exceed 60,000 pounds during any one day and shall not exceed 120,000 pounds during any one month. [District NSR Rule] Federally Enforceable Through Title V Permit
3. PM10 emission rate shall not exceed 0.003 pounds per ton of salt received. [District NSR Rule] Federally Enforceable Through Title V Permit
4. A minimum of 7.7 gpm of water shall be added during transfer of the salt from the trucks to the storage tank. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Permittee shall maintain a daily record of the date and quantity of salt received. [District NSR Rule] Federally Enforceable Through Title V Permit
6. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rule 1070 and 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:** N-238-24-5

**EXPIRATION DATE:** 03/31/2009

**EQUIPMENT DESCRIPTION:**

FIRST GRIND OVERFLOW TANK SERVED BY A PPC INDUSTRIES MODEL 616PFG SOX SCRUBBER AND A BIOTON MODEL 2-2-34 BIOFILTER (THE CONTROL EQUIPMENT ALSO SERVES N-238-33).

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
2. Each scrubber shall have an operational differential pressure gauge. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Each scrubber liquid supply (at inlet to scrubber) shall have an operational flow meter. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The scrubber sprays and/or nozzles shall be strictly maintained in optimum working condition. [District NSR Rule] Federally Enforceable Through Title V Permit
5. A minimum liquid to gas ratio of 4 gpm per 1,000 cfm shall be provided for each scrubber. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The emissions from this unit shall be ducted to the control devices at all times that the equipment is in operation except for SOx scrubber and biofilter maintenance or a complete biofilter bed change out. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Except for SOx scrubber and biofilter maintenance, or a complete biofilter bed change out, the combined SOx emissions from the equipment operating under Permits to Operate N-238-33 and N-238-24 shall not exceed 1.25 pounds per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Except for SOx scrubber and biofilter maintenance, or a complete biofilter bed change out, the combined VOC emissions from the equipment operating under Permits to Operate N-238-33 and N-238-24 shall not exceed 0.33 pounds per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
9. The exhaust gases may be bypassed through the bypass duct prior to the SOx scrubber in the event of SOx scrubber or biofilter maintenance, or for complete biofilter bed change out. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The exhaust gases may be bypassed for a period not to exceed 200 hours per year for maintenance of the SOx scrubber or the biofilter. [District NSR Rule] Federally Enforceable Through Title V Permit
11. The exhaust gases may be bypassed for a period not to exceed 340 hours per year for the complete biofilter bed change out. [District NSR Rule] Federally Enforceable Through Title V Permit
12. Records shall be kept indicating the date and time and duration of time maintenance was performed such that the exhaust gases were bypassed from the SOx scrubber and the biofilter or when a complete biofilter bed change out was performed. [District NSR Rule] Federally Enforceable Through Title V Permit
13. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rule 1070 and District Rule 2520, 9.4.2 and 40 CFR part 64] 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. Records of the SO<sub>x</sub> scrubber liquid flow rate shall be observed and recorded weekly during operation of this unit. 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
15. Records of the biofilter temperature and water flow from sprays shall be observed and recorded daily, during operation of this unit. 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 and 40 CFR part 64] Federally Enforceable Through Title V Permit
16. During operation the water flow rate through the biofilter sprays shall not be less than 4 gal/minute. [40 CFR part 64] Federally Enforceable Through Title V Permit
17. If the water flow rate through the biofilter sprays is less than 4 gal/minute during operation, the permittee shall correct the water flow rate to exceed 4 gal/minute, as soon as possible, but no longer than 1 hour of operation after detection. If the water flow rate continues to be less than 4 gal/minute after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. [40 CFR part 64] Federally Enforceable Through Title V Permit
18. During operation the biofilter temperature shall not exceed 110 degrees F and shall not be less than 60 degrees F. [40 CFR part 64] Federally Enforceable Through Title V Permit
19. The temperature of the air flow through the biofilter media shall be monitored daily during operation. [40 CFR part 64] Federally Enforceable Through Title V Permit
20. The temperature gauge (probe) monitoring the air flow through the biofilter media shall be maintained per manufacturer's recommendations. [40 CFR part 64] Federally Enforceable Through Title V Permit
21. The biofilter spray nozzles shall be maintained per manufacturer's recommendations. [40 CFR part 64] Federally Enforceable Through Title V Permit
22. Biofilter shall be thoroughly inspected annually for spray nozzle malfunction, biofilter media deterioration and shall be replaced or repaired as needed. [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:** N-238-25-3

**EXPIRATION DATE:** 03/31/2009

**EQUIPMENT DESCRIPTION:**

GLUTEN DEWATERING FILTER AND VACUUM SYSTEMS WITH A SOX SCRUBBER ON THE EXHAUST STREAM.

## PERMIT UNIT REQUIREMENTS

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1. The scrubber sprays and/or nozzles shall be strictly maintained in optimum working condition. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The pH of the scrubbing liquid shall be maintained at 6.5 or greater with a purge flow rate of 6.0 gallons per minute. A continuous monitoring device shall be installed and maintained to measure the pH of the scrubbing liquid. [District NSR Rule] Federally Enforceable Through Title V Permit
3. A minimum liquid to gas ratio of 17.7 gpm per 1,000 cfm shall be provided for this scrubber or the liquid recirculation rate shall be at least 230 gpm for sufficient contact. [District NSR Rule] Federally Enforceable Through Title V Permit
4. A liquid flow meter to monitor the liquid recirculation flow rate shall be installed and maintained in proper working order. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The SOx emissions shall not exceed 0.146 pounds per hour while the exhaust gases are passed through the SOx scrubber. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The SOx emissions shall not exceed 0.250 pounds per hour while the exhaust gases are bypassed from the SOx scrubber during scrubber maintenance. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The VOC emissions shall not exceed 2.083 pounds per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The exhaust gases may be bypassed around the SOx scrubber in the event of SOx scrubber maintenance for a period not to exceed 48 hours per year. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Records shall be kept indicating the date and time and duration of time maintenance was performed such that the exhaust gases were bypassed around the SOx scrubber. [District NSR Rule] Federally Enforceable Through Title V Permit
10. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rule 1070 and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
11. Liquid flow meter shall be observed and recorded weekly during operation of this unit. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
12. Records of the SOx scrubber liquid flow rate shall be observed and recorded weekly during operation of this unit. 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:** N-238-29-2

**EXPIRATION DATE:** 03/31/2009

**EQUIPMENT DESCRIPTION:**

SULFUROUS ACID PLANT CONSISTING OF: AN ELEMENTAL SULFUR BURNER AND TWO ABSORBERS VENTED TO A LUNDBERG SCRUBBER WITH A MIST ELEMINATOR; TWELVE STEEP TANKS (69,000 GAL. EACH) AND ONE DRAW TANK VENTED TO THE LINDBERG SCRUBBER SERVING THE ACID PLANT.

## PERMIT UNIT REQUIREMENTS

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1. Scrubber sprays and/or nozzles shall be maintained in optimum working condition. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The scrubber and the scrubber fluid shall be maintained such that the scrubber provides at least 99% control of the SO<sub>2</sub> emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The mist eliminator shall be properly maintained and must be operating during the sulfurous acid production process. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The sulfur dioxide (SO<sub>2</sub>) emissions concentration shall not exceed 0.7 pounds per ton of elemental sulfur burned in the sulfur burner. [District NSR Rule] Federally Enforceable Through Title V Permit
5. No more than 6,000 pounds of elemental sulfur shall be burned in the sulfur burner during any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Records of the daily amount of elemental sulfur burned shall be kept on the premises. Records shall be maintained for a period of at least five years and shall be made available for District inspection upon request. [District NSR Rule and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
7. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [District Rule 4801] 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:** N-238-30-1

**EXPIRATION DATE:** 03/31/2009

**EQUIPMENT DESCRIPTION:**

SODA ASH RECEIVING AND STORAGE WITH ONE (1) 60,000 GALLON STORAGE TANK SERVED BY A DUCON MULTIVANE WET SCRUBBER (TYPE L, SIZE 18).

## PERMIT UNIT REQUIREMENTS

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1. There shall be no visible emissions from the scrubber. [District NSR Rule] Federally Enforceable Through Title V Permit
2. The scrubber shall have operational differential pressure indicator. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Scrubber sprays and/or nozzles shall be maintained in optimum working condition. [District NSR Rule] Federally Enforceable Through Title V Permit
4. All emissions from soda ash slurry storage tank shall be vented through the scrubber. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The PM10 emission concentration shall not exceed 0.002 lbs per ton of material received. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The maximum amount of material received shall not exceed 54 tons in any one day. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Daily records of the amount of material received shall be maintained, retained on the premises for a minimum of five years, and made available for District inspection upon request. [District NSR Rule and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
8. Records of the PM10 scrubber pressure differential shall be observed and recorded weekly during soda ash unloading. 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

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** N-238-33-1

**EXPIRATION DATE:** 03/31/2009

**EQUIPMENT DESCRIPTION:**

DAVENPORT, MODEL RSTD, GLUTEN DRYER SERVED BY A CYCLONE, A PARTICULATE MATTER SCRUBBER, A PPC INDUSTRIES, MODEL 616PFG, SOX SCRUBBER, AND A BIONTON, MODEL 2-2-34, BIOFILTER (THE SOX & VOC CONTROLS ARE SHARED WITH PERMIT N-238-24).

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
2. Each scrubber shall have an operational differential pressure gauge. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Each scrubber liquid supply (at inlet to scrubber) shall have an operational flow meter. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The scrubber sprays and/or nozzles shall be strictly maintained in optimum working condition. [District NSR Rule] Federally Enforceable Through Title V Permit
5. A minimum liquid to gas ratio of 4 gpm per 1,000 cfm shall be provided for each scrubber. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The emissions from this unit shall be ducted to the control devices at all times that the equipment is in operation except for SOx scrubber and biofilter maintenance or a complete biofilter bed change out. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Except for SOx scrubber and biofilter maintenance, or a complete biofilter bed change out, the combined SOx emissions from the equipment operating under Permits to Operate N-238-33 and N-238-24 shall not exceed 1.25 pounds per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Except for SOx scrubber and biofilter maintenance, or a complete biofilter bed change out, the combined VOC emissions from the equipment operating under Permits to Operate N-238-33 and N-238-24 shall not exceed 0.33 pounds per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
9. PM10 emissions shall not exceed 1.04 pounds per hour. [District NSR Rule] Federally Enforceable Through Title V Permit
10. The exhaust gases may be bypassed through the bypass duct after the particulate scrubber and prior to the SOx scrubber in the event of SOx scrubber or biofilter maintenance, or for complete biofilter bed change out. [District NSR Rule] Federally Enforceable Through Title V Permit
11. The exhaust gases may be bypassed for a period not to exceed 200 hours per year for maintenance of the SOx scrubber or the biofilter. [District NSR Rule] Federally Enforceable Through Title V Permit
12. The exhaust gases may be bypassed for a period not to exceed 340 hours per year for the complete biofilter bed change out. [District NSR Rule] Federally Enforceable Through Title V Permit
13. Records shall be kept indicating the date and time and duration of time maintenance was performed such that the exhaust gases were bypassed from the SOx scrubber and the biofilter or when a complete biofilter bed change out was performed. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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14. All records shall be retained for a minimum of 5 years, and shall be made available for District inspection upon request. [District Rule 1070 and District Rule 2520, 9.4.2 and 40 CFR part 64] Federally Enforceable Through Title V Permit
15. The District shall be notified of any breakdown conditions in accordance with Rule 1100 (Equipment Breakdown). [District Rule 1100]
16. Records of the SO<sub>x</sub> scrubber liquid flow rate shall be observed and recorded weekly during operation of this unit. 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
17. Records of the PM<sub>10</sub> particulate scrubber liquid flow rate shall be observed and recorded daily during operation of this unit. 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 and 40 CFR part 64] Federally Enforceable Through Title V Permit
18. Records of the biofilter temperature and water flow from sprays shall be observed and recorded daily, during operation of this unit. 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 and 40 CFR part 64] Federally Enforceable Through Title V Permit
19. During operation the water flow rate through the biofilter sprays shall not be less than 4 gal/minute. [40 CFR part 64] Federally Enforceable Through Title V Permit
20. If the water flow rate through the biofilter sprays is less than 4 gal/minute during operation, the permittee shall correct the water flow rate to exceed 4 gal/minute, as soon as possible, but no longer than 1 hour of operation after detection. If the water flow rate continues to be less than 4 gal/minute after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. [40 CFR part 64] Federally Enforceable Through Title V Permit
21. During operation the biofilter temperature shall not exceed 110 degrees F and shall not be less than 60 degrees F. [40 CFR part 64] Federally Enforceable Through Title V Permit
22. The temperature of the air flow through the biofilter media shall be monitored daily during operation. [40 CFR part 64] Federally Enforceable Through Title V Permit
23. The temperature gauge (probe) monitoring the air flow through the biofilter media shall be maintained per manufacturer's recommendations. [40 CFR part 64] Federally Enforceable Through Title V Permit
24. The biofilter spray nozzles shall be maintained per manufacturer's recommendations. [40 CFR part 64] Federally Enforceable Through Title V Permit
25. Biofilter shall be thoroughly inspected annually for spray nozzle malfunction, biofilter media deterioration and shall be replaced or repaired as needed. [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.

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# ATTACHMENT C

Stringency Comparison for District Rule 4601

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**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	<b>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.</b>		
	<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</p> <p>5.2.9 High temperature coatings</p> <p>5.2.10 Temperature-indicator safety coatings</p> <p>5.2.11 Antenna coatings</p> <p>5.2.12 Antifouling coatings</p> <p>5.2.13 Flow coatings</p> <p>5.2.14 Bituminous roof primers</p> <p>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)</p> <p>5.2.3.2 Metallic pigmented coatings</p> <p>5.2.3.3 Shellacs</p> <p>5.2.3.4 Fire-retardant coatings</p> <p>5.2.3.5 Pretreatment wash primers</p> <p>5.2.3.6 Industrial maintenance coatings</p> <p>5.2.3.7 Low-solids coatings</p> <p>5.2.3.8 Wood preservatives</p> <p>5.2.3.9 High temperature coatings</p> <p>5.2.3.10 Temperature-indicator safety coatings</p> <p>5.2.3.11 Antenna coatings</p> <p>5.2.3.12 Antifouling coatings</p> <p>5.2.3.13 Flow coatings</p> <p>5.2.3.14 Bituminous roof primers</p> <p>5.2.3.15 Specialty primers, sealers and undercoaters</p> <p>5.2.3.16 Aluminum roof coatings</p> <p>5.2.3.17 Zinc-rich primers</p> <p>5.2.3.18 Wood Coatings</p>	
	<p>5.3 Sell-Through of Coatings:</p> <p>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.</p> <p>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:</p> <p>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.
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.
		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.
<b>6.0 Administrative Requirements</b>	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

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<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 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>	

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		<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>

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	<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>	
<b>7.0 Compliance Schedule</b>	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.	<b>No change in the requirements, therefore, non-SIP version of rule is as stringent as SIP version.</b>
<b>8.0 Averaging Compliance Option</b>	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		<b>No change in the requirements, therefore, non-SIP version of rule is as stringent as SIP version.</b>

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.

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# ATTACHMENT D

Detailed Facility List

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**Detailed Facility Report**  
For Facility=238 and excluding Deleted Permits  
Sorted by Facility Number and Permit Number

<b>CORN PRODUCTS INTERNATIONAL</b> 1021 INDUSTRIAL DR STOCKTON, CA 95206	FAC # STATUS: TELEPHONE:	<b>N 238</b> <b>A</b> <b>(209) 982-1920</b>	TYPE: TOXIC ID:	<b>TitleV</b> <b>20302</b>	EXPIRE ON: AREA: INSP. DATE:	<b>03/31/2009</b> <b>2 /</b> <b>04/11</b>
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PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
N-238-1-1	606 HP	3020-01 F	1	607.00	607.00	A	CORN RECEIVING AND STORAGE CONSISTING OF: RECEIVING PITS, VARIOUS CONVEYING EQUIPMENT, AND THREE HOPPERS ALL VENTED TO A CARTER-DAY MODEL 376-RF8 BAGHOUSE; AND TWO STORAGE BINS EACH EQUIPPED WITH A BIN VENT FILTER.
N-238-2-1	286 HP	3020-01 E	1	412.00	412.00	A	CORN CLEANING OPERATION WITH: THREE DRAG CONVEYORS AND ONE ELEVATOR VENTED TO A BIN FILTER; ASPERATED CORN CLEANER, TWO HOPPERS, AND VARIOUS CONVEYORS VENTED TO A CARTER-DAY BAGHOUSE; AND ONE CORN CLEANINGS HOPPER VENTED TO A CARTER-DAY BAGHOUSE.
N-238-8-1	106.5 HP	3020-01 D	1	314.00	314.00	A	GLUTEN MILLING, TRANSFER, AND STORAGE SERVED BY A CARTER-DAY DUST COLLECTOR, TYPE R-F.
N-238-9-3	155 hp	3020-01 D	1	314.00	314.00	A	BULK GLUTEN LOADOUT SYSTEM WITH A STATIONARY HOOD AND A W.W. SLY, MODEL XP-10, RETRACTABLE LOADING SPOUT SERVED BY A ALANCO, MODEL 378-RLP-FILTER, BAGHOUSE.
N-238-10-9	21 MMBtu/hr	3020-02 H	1	1,030.00	1,030.00	A	STARCH FLASH DRYER EQUIPPED WITH A 21 MMBTU/HR COEN QLN BURNER AND TWO STARCH RECOVERY CYCLONES SERVED BY TWO DUCON MULTIVANE GAS SCRUBBERS TYPE L MODEL II
N-238-11-2	543.5 HP	3020-01 F	1	607.00	607.00	A	STARCH TRANSFER AND STORAGE SERVED BY A CARTER-DAY DUST COLLECTOR, TYPE R-F.
N-238-12-1	29.8 HP	3020-01 B	1	117.00	117.00	A	BULK STARCH LOADOUT SERVED BY A CARTER-DAY DUST COLLECTOR
N-238-13-5	176 HP	3020-01 D	1	314.00	314.00	A	ONE (1) GERM DRYER SERVED BY A CYCLONE, A DUCON TYPE L MODEL II PARTICULATE SCRUBBER, AND A PPC INDUSTRIES MODEL 616PFG SOX SCRUBBER.
N-238-14-1	73 HP	3020-01 C	1	197.00	197.00	A	GERM TRANSFER AND STORAGE SERVED BY A CARTER-DAY BAGHOUSE, TYPE R-F.
N-238-15-1	8 HP	3020-01 A	1	87.00	87.00	A	BULK GERM LOADOUT
N-238-16-1	5,500 CU FT (41,000 GALLONS)	3020-05 C	1	135.00	135.00	A	FILTER-AID RECEIVING AND STORAGE SERVED BY A CARTER-DAY BAG HOUSE, TYPE R-F.
N-238-17-1	54 HP	3020-01 C	1	197.00	197.00	A	CARBON RECEIVING AND STORAGE SERVED BY A CARTER-DAY BAGHOUSE, MODEL 28 RF6.
N-238-18-3	2,800 kW	3020-08A C	1	1,533.00	1,533.00	A	ONE (1) SOLAR TURBINE INCORPORATED CENTAUR 2800 KW (ISO) CONTINUOUS DUTY INDUSTRIAL GAS TURBINE GENERATOR AND A DELTA WASTE HEAT BOILER, MODEL 3L-227.
N-238-19-3	12,000 GAL. SALT STORAGE TANK	3020-05 B	1	93.00	93.00	A	ONE (1) 12,000 GALLON ABOVE GROUND SALT SLURRY STORAGE TANK.

**Detailed Facility Report**  
For Facility=238 and excluding Deleted Permits  
Sorted by Facility Number and Permit Number

PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
N-238-24-5	CONTAINER 6,800 GALS	3020-05 B	1	93.00	93.00	A	FIRST GRIND OVERFLOW TANK SERVED BY A PPC INDUSTRIES MODEL 616PFG SOX SCRUBBER AND A BIOTON MODEL 2-2-34 BIOFILTER (THE CONTROL EQUIPMENT ALSO SERVES N-238-33).
N-238-25-3	375 hp electric motor	3020-01 E	1	412.00	412.00	A	GLUTEN DEWATERING FILTER AND VACUUM SYSTEMS WITH A SOX SCRUBBER ON THE EXHAUST STREAM.
N-238-29-2	356 HP	3020-01 E	1	412.00	412.00	A	SULFUROUS ACID PLANT CONSISTING OF: AN ELEMENTAL SULFUR BURNER AND TWO ABSORBERS VENTED TO A LUNDBERG SCRUBBER WITH A MIST ELEMINATOR; TWELVE STEEP TANKS (69,000 GAL. EACH) AND ONE DRAW TANK VENTED TO THE LINDBERG SCRUBBER SERVING THE ACID PLANT.
N-238-30-1	60,000 GALLONS	3020-05 D	1	185.00	185.00	A	SODA ASH RECEIVING AND STORAGE WITH ONE (1) 60,000 GALLON STORAGE TANK SERVED BY A DUCON MULTIVANE WET SCRUBBER (TYPE L, SIZE 18).
N-238-33-1	226.5 HP	3020-01 E	1	412.00	412.00	A	DAVENPORT, MODEL RSTD, GLUTEN DRYER SERVED BY A CYCLONE, A PARTICULATE MATTER SCRUBBER, A PPC INDUSTRIES, MODEL 616PFG, SOX SCRUBBER, AND A BIOTON, MODEL 2-2-34, BIOFILTER (THE SOX & VOC CONTROLS ARE SHARED WITH PERMIT N-238-24).

Number of Facilities Reported: 1