



Permit to Operate Modification 5840-07
and
Part 70 Minor Permit Modification 5840-07

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EQUIPMENT OWNER:

Celite Corporation

205129

EQUIPMENT OPERATOR:

Celite Corporation

EQUIPMENT LOCATION:

2500 Miguelito Rd, Lompoc

STATIONARY SOURCE/FACILITY:

Celite Corporation

SSID: 01735

FID: 00012

AUTHORIZED MODIFICATION:

This modification de-permits and implements hour limitations and airflow limitations on select baghouses in order to provide reductions in PM/PM₁₀ emissions and reduce the associated NEI. These “P2 term” reductions in NEI will allow offsets to be avoided for 7 System baghouse emission increases permitted concurrently under ATC-Mod 12105-09.

PROJECT/PROCESS DESCRIPTION:

Celite currently mines and processes diatomaceous earth (DE) at its Lompoc Plant. Celite operates four product lines (3, 5, 6, and 7 Systems) each with “wet end” and “dry end” processing. Wet diatomaceous earth crude is surface mined, crushed, milled and dried and/or calcined at high temperatures. The dried product is classified into a variety of grades and bagged or bulk loaded for shipment to distributors and customers. The Celite Facility ID is 0012 and the Stationary Source ID is 1735.

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CONDITIONS:

9.A Standard Administrative Conditions

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

A.1 Compliance with Permit Conditions

- (a) The permittee shall comply with all permit conditions in Sections 9.A, 9.B and 9.C.
- (b) This permit does not convey property rights or exclusive privilege of any sort.
- (c) Any permit noncompliance constitutes a violation of the Clean Air Act and is grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application.
- (d) It shall not be a defense for the permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (e) A pending permit action or notification of anticipated noncompliance does not stay any permit condition.
- (f) Within a reasonable time period, the permittee shall furnish any information requested by the Control Officer, in writing, for the purpose of determining:
 - (i) compliance with the permit, or
 - (ii) whether or not cause exists to modify, revoke and reissue, or terminate a permit or for an enforcement action. [*Re: 40 CFR Part 70.6, APCD Rules 1303.D.1*]
- (g) In the event that any condition herein is determined to be in conflict with any other condition contained herein, then, if principles of law do not provide to the contrary, the condition most protective of air quality and public health and safety shall prevail to the extent feasible.

A.2 Emergency Provisions. The permittee shall comply with the requirements of the APCD, Rule 505 (Upset/Breakdown rule) and/or APCD Rule 1303.F, whichever is applicable to the emergency situation. In order to maintain an affirmative defense under Rule 1303.F, the permittee shall provide the APCD, in writing, a “notice of emergency” within 2 days of the emergency. The “notice of emergency” shall contain the information/documentation listed in Sections (1) through (5) of Rule 1303.F. [*Re: 40 CFR 70.6, APCD Rule 1303.F*]

A.3 Compliance Plan.

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

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- (b) For all applicable equipment, the permittee shall implement and comply with any specific compliance plan required under any federally-enforceable rules or standards. [*Re: APCD Rule 1302.D.2*]
- A.4 **Right of Entry.** The Regional Administrator of USEPA, the Control Officer, or their authorized representatives, upon the presentation of credentials, shall be permitted to enter upon the premises where a Part 70 Source is located or where records must be kept:
- (a) To inspect the stationary source, including monitoring and control equipment, work practices, operations, and emission-related activity;
- (b) To inspect and duplicate, at reasonable times, records required by this Permit to Operate;
- (c) To sample substances or monitor emissions from the source or assess other parameters to assure compliance with the permit or applicable requirements, at reasonable times. Monitoring of emissions can include source testing. [*Re: APCD Rule 1303.D.2*]
- A.6 **Payment of Fees.** The permittee shall reimburse the APCD for all its Part 70 permit processing and compliance expenses for the stationary source on a timely basis. Failure to reimburse on a timely basis shall be a violation of this permit and of applicable requirements and can result in forfeiture of the Part 70 permit. Operation without a Part 70 permit subjects the source to potential enforcement action by the APCD and the USEPA pursuant to section 502(a) of the Clean Air Act. [*Re: APCD Rules 1303.D.1 and 1304.D.11, 40 CFR 70.6*]
- A.7 **Prompt Reporting of Deviations:** The permittee shall submit a written report to the APCD documenting each and every deviation from the requirements of this permit or any applicable federal requirements within 7 days after discovery of the violation, but not later than 180-days after the date of occurrence. The report shall clearly document 1) the probable cause and extent of the deviation, 2) equipment involved, 3) the quantity of excess pollutant emissions, if any, and 4) actions taken to correct the deviation. The requirements of this condition shall not apply to deviations reported to APCD in accordance with Rule 505. *Breakdown Conditions*, or Rule 1303.F *Emergency Provisions*. [APCD Rule 1303.D.1, 40 CFR 70.6(a) (3)]
- A.8 **Reporting Requirements/Compliance Certification:** The permittee shall submit compliance certification reports to the USEPA and the Control Officer every six months. These reports shall be submitted on APCD forms and shall identify each applicable requirement/condition of the permit, the compliance status with each requirement/condition, the monitoring methods used to determine compliance, whether the compliance was continuous or intermittent, and include detailed information on the occurrence and correction of any deviations (excluding emergency upsets) from permit requirement. The reporting periods shall be each half of the calendar year, e.g., January through June for the first half of the year. These reports shall be submitted by September 1 and March 1, respectively, each year. Supporting monitoring data shall be submitted in accordance with the “Semi-Annual Monitoring/Compliance Verification Report” condition in section 9.C. The permittee shall include a written statement from the responsible official, which certifies the truth, accuracy, and completeness of the reports. [*Re: APCD Rules 1303.D.1, 1302.D.3, 1303.2.c*]

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- A.9 **Federally-Enforceable Conditions.** Each federally-enforceable condition in this permit shall be enforceable by the USEPA and members of the public. None of the conditions in the APCD-only enforceable section of this permit are federally-enforceable or subject to the public/USEPA review. [*Re: CAAA, § 502(b)(6), 40 CFR 70.6*]
- A.10 **Recordkeeping Requirements.** Records of required monitoring information shall include the following:
- (a) The date, place as defined in the permit, and time of sampling or measurements;
 - (b) The date(s) analyses were performed;
 - (c) The company or entity that performed the analyses;
 - (d) The analytical techniques or methods used;
 - (e) The results of such analyses; and
 - (f) The operating conditions as existing at the time of sampling or measurement;

The records (electronic or hard copy), as well as all supporting information including calibration and maintenance records, shall be maintained for a minimum of five (5) years from date of initial entry by the permittee and shall be made available to the APCD upon request. [*Re: APCD Rule 1303.D.1.f, 40CFR70.6(a)(3)(ii)(A)*]

- A.11 **Conditions for Permit Reopening.** The permit shall be reopened and revised for cause under any of the following circumstances:
- (a) Additional Requirements: If additional applicable requirements (e.g., NSPS or MACT) become applicable to the source which has an unexpired permit term of three (3) or more years, the permit shall be reopened. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. However, no such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended. All such re-openings shall be initiated only after a 30-day notice of intent to reopen the permit has been provided to the permittee, except that a shorter notice may be given in case of an emergency.
 - (b) Inaccurate Permit Provisions: If the APCD or the USEPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit, the permit shall be reopened. Such re-openings shall be made as soon as practicable.
 - (c) Applicable Requirement: If the APCD or the USEPA determines that the permit must be revised or revoked to assure compliance with any applicable requirement including a federally-enforceable requirement, the permit shall be reopened. Such re-openings shall be made as soon as practicable.

Administrative procedures to reopen and revise/revoke/reissue a permit shall follow the same procedures as apply to initial permit issuance. Re-openings shall affect only those parts of the permit for which cause to reopen exists.

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If a permit is reopened, the expiration date does not change. Thus, if the permit is reopened, and revised, then it will be reissued with the expiration date applicable to the re-opened permit. [Re: 40 CFR 70.7, 40 CFR 70.6]

A.12 **Grounds for Revocation.** Failure to abide by and faithfully comply with this permit or any Rule, Order, or Regulation may constitute grounds for the APCO to petition for permit revocation pursuant to California Health & Safety Code Section 42307 *et seq.*

9.B. Generic Conditions

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

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

- (a) As dark or darker in shade as that designated as No. 1 on the Ringlemann Chart, as published by the United States Bureau of Mines, or
- (b) Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subsection B.2(a) above.

B.3 **Nuisance (Rule 303):** No pollutant emissions from any source at the permittee shall create nuisance conditions. Operations shall not endanger health, safety or comfort, nor shall they damage any property or business. [Re: APCD Rule 303]

9.C Requirements and Equipment Specific Conditions

The following emission limits and operational limits supersede the corresponding limits of the baghouses permitted herein. The *Monitoring, Recordkeeping* and *Reporting* requirements augment the corresponding requirements of the baghouses permitted herein. All other permit conditions in PTO/Part-70 Permit 5840-R3 remain unchanged and in full force.

C.1 **Baghouses.** The following equipment is included in this emissions unit category:

Device Name	Process Line	APCD DeviceNo
3 Automatic Packing Station Baghouse (345)	Multiple	108
Crude Bin Ventilation Baghouse	Celpure	8073
Soda Ash Bin Baghouse	Celpure	8074

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- (a) Emission Limits: Mass emissions from baghouses listed above shall not exceed the limits listed in Table 3 and Table 4.
- (b) Operational Limits: The following operational limits shall apply:
 - (i) *Operating Schedule*. The equipment listed above shall not exceed the hours of operation specified in the Table 1.
 - (ii) *Air Flow Rate*. The baghouses listed above shall not exceed the airflow rate specified in Table 1.
- (c) Monitoring: The following monitoring conditions shall apply:
 - (i) *Hours of Operation*. Celite shall monitor the daily hours of operation of the Soda Ash Baghouse and the Crude Bin Vent Baghouse in accordance with the *Process Monitor Plan for PTO Mod 5840-07, including 345BH and 773BH* (approved 2/24/2010).
 - (ii) *Air Flow Rate*. Celite shall monitor the air flow rate of baghouse 345BH in accordance with the *Process Monitor Plan for PTO Mod 5840-07, including 345BH and 773BH* (approved 2/24/2010).
- (d) Recordkeeping. Celite shall keep the following records to demonstrate compliance with emission limits, operation limits and monitoring requirements above.
 - (i) *Hours of Operation*. Celite shall record the daily hours of operation of the Soda Ash Baghouse and the Crude Bin Vent Baghouse.
 - (ii) *Air Flow Rate*. Celite shall continuously record the air flow rate of baghouse 345BH.
- (e) Reporting On a semi-annual basis, a report detailing the previous six month's activities shall be provided to the APCD. The report must list all the data required by condition 9.C.13 of PTO 5840-R3 (*Semi-Annual Monitoring/Compliance Verification Reports*). In addition, this report shall include:
 - (i) *Hours of Operation*. The daily hours of operation of the Soda Ash Baghouse and the Crude Bin Vent Baghouse.
 - (ii) *Air Flow Rate*. The peak (second-by-second) air flow rate of baghouse 345BH, reported on a weekly basis.

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C.2 **Documents Incorporated by Reference.** The documents listed below, including any APCD-approved updates thereof, are incorporated herein and shall have the full force and effect of a permit condition for this operating permit. These documents shall be implemented for the life of the project.

- (a) Process Monitor Plan for PTO 5840-07, including 345BH and 773BH (approved 2/24/2010)

9.D APCD-Only Conditions

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

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

- (a) The USEPA has provided written comments to the APCD and these comments require no modification to this permit. The APCD will issue a letter stating that this permit is a final Part 70 permit. The effective date that this permit will be considered a final Part 70 permit will be the date stamped on the APCD's letter.
- (b) After the USEPA has provided the APCD written comments that require a modification to this permit, the APCD will modify this permit to address the USEPA's comments and issue the Part 70 permit as final. The re-issued permit will supersede this permit in its entirety.

AIR POLLUTION CONTROL OFFICER

DATE

Attachments:

- Permit Evaluation for Permit to Operate Modification 5840-07.

Note:

- 1. Next Reevaluation Due: March 2010
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TABLE 1 - Operating Equipment Description

Part 70/APCD PTO 5840-07

Celite Corporation - Lompoc Plant

Equipment Description			Equipment Specification		Operating Limitations		
Equipment Item	Process Line	APCD DeviceNo	Size	Units	On-line		
					(hr/day)	(hr/qtr)	(hr/yr)
3 Automatic Packing Station Baghouse (345)	Line 3	108	20,000	scf/minute	24	2130	8520
Crude Bin Ventilation Baghouse	Celpure	8073	2,811	scf/minute	1	365	365
Soda Ash Bin Baghouse	Celpure	8074	600	scf/minute	12	104	416

TABLE 2 - Equipment Emission Factors Federally Enforceable

Part 70/APCD PTO 5840-07

Celite Corporation - Lompoc Plant

Equipment Description			Emission Factors						References	
Equipment Item	Process Line	APCD DeviceNo	NOx	ROC	CO	SOx	PM	PM10		Units
3 Automatic Packing Station Baghouse	Line 3	108					0.007	0.002	gr/dscf	ATC 8202-01
Crude Bin Ventilation Baghouse	Celpure	8073					0.005	0.005	gr/dscf	ATC/PTO 11107
Soda Ash Bin Baghouse	Celpure	8074					0.005	0.005	gr/dscf	ATC/PTO 11107

TABLE 3 - Short Term Emissions															
Part 70/APCD PTO 5840-07															
Celite Corporation - Lompoc Plant															
Equipment Description			NOx		ROC		CO		SOx		PM		PM10		Federal Enforceability
Equipment Item	Process Line	APCD DeviceNo	lb/hr	lb/day											
3 Automatic Packing Station Baghouse	Line 3	108	--	--	--	--	--	--	--	--	1.20	28.80	0.34	8.23	FE
Crude Bin Ventilation Baghouse	Celpure	8073	--	--	--	--	--	--	--	--	0.12	0.12	0.12	0.12	FE
Soda Ash Bin Baghouse	Celpure	8074	--	--	--	--	--	--	--	--	0.03	0.31	0.03	0.31	FE

TABLE 4 - Long Term Emissions															
Part 70/APCD PTO 5840-07															
Celite Corporation - Lompoc Plant															
Equipment Description			NOx		ROC		CO		SOx		PM		PM10		Federal Enforceability
Equipment Item	Process Line	APCD DeviceNo	TPQ	TPY	TPQ	TPY	TPQ	TPY	TPQ	TPY	TPQ	TPY	TPQ	TPY	
3 Automatic Packing Station Baghouse	Line 3	108	--	--	--	--	--	--	--	--	1.28	5.11	0.37	1.46	FE
Crude Bin Ventilation Baghouse	Celpure	8073	--	--	--	--	--	--	--	--	0.005	0.022	0.005	0.022	FE
Soda Ash Bin Baghouse	Celpure	8074	--	--	--	--	--	--	--	--	0.001	0.005	0.001	0.005	FE

Table 5 Equipment List

PTO Mod 05840 07 / FID: 00012 Celite Corporation / SSID: 01735

A PERMITTED EQUIPMENT

1 Crude Bin Ventilation Baghouse

<i>Device ID #</i>	008073	<i>Device Name</i>	Crude Bin Ventilation Baghouse
<i>Rated Heat Input</i>		<i>Physical Size</i>	1620.00 scf/Minute
<i>Manufacturer</i>	DCE Sintamatic	<i>Operator ID</i>	DC1
<i>Model</i>	CS 138FP	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	1620 cfm, 0.00044 gr/acf Electronically limited to 1 hour/day		

2 Soda Ash Bin Baghouse

<i>Device ID #</i>	008074	<i>Device Name</i>	Soda Ash Bin Baghouse
<i>Rated Heat Input</i>		<i>Physical Size</i>	600.00 Cubic Feet/Minute
<i>Manufacturer</i>	Sintamatic	<i>Operator ID</i>	DC2
<i>Model</i>	CSI 12 K5	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Associated with Soda Ash Bin Dust Collector (CP42) Electronically limited to 12 hours/day		

3 3 automatic packing station Baghouse (345)

<i>Device ID #</i>	000108	<i>Device Name</i>	3 automatic packing station Baghouse (345)
<i>Rated Heat Input</i>		<i>Physical Size</i>	20000.00 scf/Minute
<i>Manufacturer</i>	Fabric Filters Northwest	<i>Operator ID</i>	345BH
<i>Model</i>	16 oz Polypropylene	<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Ventilation 3 A/P Packing equipment; Negative pressure; Bag Diam. (in): 5.0; Bag Length (ft): 12.0; Total Cloth Area: 8671; Est. A/C Ratio: 4.0 Electronically limited to 20,000 scfm		

B DE-PERMITTED EQUIPMENT

1 DE Bin Baghouse

<i>Device ID #</i>	008080	<i>Device Name</i>	DE Bin Baghouse
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	DCE Sintamatic	<i>Operator ID</i>	DC13
<i>Model</i>	CSI 12 K5	<i>Serial Number</i>	
<i>Depermitted</i>		<i>Facility Transfer</i>	
<i>Device</i>	600cfm, 0.00044 gf/acf		
<i>Description</i>			

2 Alternate Materials Baghouse

<i>Device ID #</i>	008081	<i>Device Name</i>	Alternate Materials Baghouse
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	DCE Sintamatic	<i>Operator ID</i>	DC14
<i>Model</i>	CSI 12K5	<i>Serial Number</i>	
<i>Depermitted</i>		<i>Facility Transfer</i>	
<i>Device</i>	600 cfm, 0.00044 gr/acf		
<i>Description</i>			



PERMIT EVALUATION FOR PERMIT TO OPERATE MODIFICATION 5840-07

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1.0 BACKGROUND

- 1.1 General: Celite mines and processes diatomaceous earth (DE) at its Lompoc Plant. Celite operates two product lines (6, and 7 Systems) each with “wet end” and “dry end” processing. Wet diatomaceous earth crude is surface mined, crushed, milled and dried and/or calcined at high temperatures. The dried product is classified into a variety of grades and bagged or bulk loaded for shipment to distributors and customers. In early 2008 System 7 was redesigned with some existing equipment removed and new equipment installed. The SCDP for System #7 has been extended several times to allow for troubleshooting, repair of equipment, and completion of compliance testing. A PTO has not yet been issued pending completion of the SCDP as currently specified in ATC12105-07. The Celite Facility ID is 0012 and the Stationary Source ID is 1735.

ATC-Mod 12105-08 (issued 12/29/2009) allowed for the installation of three new dampers and a new variable speed blower to redirect some of the hot gasses from the kiln exhaust stream to a different location in the 7 System process. This new configuration will be fully modular, and will allow the system to direct variable amounts of kiln exhaust at different locations throughout the process. As a result of this modification, Celite needs to exhaust 8,000 scfm to the atmosphere from baghouse BH773, an existing baghouse associated with the dry end of System 7. This modification is being permitted concurrently with this permit, under ATC 12150-09. Celite has elected to reduce the hours of operation on the Soda Ash Baghouse and the Crude Bin Vent Baghouse, as well as reduce airflow through Baghouse 345 in order to reduce NEI and maintain the stationary source NEI levels below offset thresholds. Celite has also elected to de-permit the Alternate Materials Baghouse and the DE Bin Baghouse.

- 1.2 Project Description: The hours of operation for the Soda Ash Baghouse and the Crude Bin Vent Baghouse are being limited to 12 hours per day and 1 hour per day, respectively. The electric starters for these baghouses will provide a feedback signal to a programmable logic controller (PLC). The PLC will be programmed to shutdown the baghouses when the maximum hours of operation are reached. The operational data will be available on Celite’s Pi server. Additionally, the maximum airflow rate through baghouse 345 is being limited to 20,000 scfm. An insertion style flow meter will monitor the flow rate through the baghouse and the signal will be sent to the PLC, which will trigger an alarm in the control room if the maximum air flow is reached or exceeded. The airflow data will be available on Celite’s Pi server.

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2.0 ENGINEERING ANALYSIS

- 2.1 Equipment/Processes: This permit modifies the hours of operation of the Soda Ash Baghouse and the Crude Bin Vent Baghouse, reduces airflow through Baghouse 345 and de-permits the Alternate Materials Baghouse and the DE Bin Baghouse.
- 2.2 Emission Controls: See Part 70 Operating Permit and Permit to Operate 5840-R3 for this section.
- 2.3 Emission Factors: Emission factors for each equipment item are based on those used in PTO 5840-R3.
- 2.4 Reasonable Worst Case Emission Scenario: Worst case emissions for the applicable baghouses have been modified to reflect 12 hours per day for the Soda Ash BH, 1 hour per day for the Crude Bin Vent BH and a limited flow rate of 20,000 scfm for 345 BH.
- 2.6 Special Calculations: None.
- 2.7 BACT Analyses: Best Available Control Technology was not required for this project.
- 2.8 Enforceable Operational Limits: The permit has enforceable operating conditions that ensure the control device is operated properly.
- 2.9 Monitoring Requirements: Monitoring of the equipment's operational limits are required to ensure that these are enforceable. This permit requires monitoring the operating parameters for the Soda Ash Baghouse, the Crude Bin Vent Baghouse, and the 345 Baghouse.
- 2.10 Recordkeeping and Reporting Requirements: The permit requires that the data which is monitored be recorded and reported to the APCD.

3.0 REEVALUATION REVIEW (not applicable)

4.0 REGULATORY REVIEW

- 4.1 Partial List of Applicable Rules: This project is anticipated to operate in compliance with the following rules:

- Rule 101. Compliance of Existing Facilities
- Rule 202. Exemptions to Rule 201
- Rule 205. Standards for Granting Permits
- Rule 303. Nuisance
- Rule 505. Breakdown Procedures
- Rule 801. New Source Review
- Rule 802. Nonattainment Review
- Rule 803. Prevention of Significant Deterioration

- 4.2 Rules Requiring Review: None

- 4.3 NEI Calculations: The net emission increase calculation is used to determine whether certain requirements must be applied to a project (e.g., offsets, AQIA, PSD BACT). The NEI values for

ATTACHMENT A

Attachment A - Stationary Source NEI
Part 70/APCD PTO 5840-07
Celite Corporation - Lompoc and Celpure Plants

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

Permit No.	Date Issued	NOx		ROC		CO		SOx		PM		PM10	
		lb/day	ton/yr										
PTO-Mod 5840-07	TBD												
Totals		0.00											

II. Stationary Source "P1s"

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

Permit No.	Date Issued	NOx		ROC		CO		SOx		PM		PM10	
		lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
PTO 5840-R2 ¹	Jun-03					145.40	25.25	3.60	0.23	10.46	4.25	12.12	2.13
A/P 11107	Dec-03									1.90	0.33	1.90	0.33
PTO 11008	Mar-04									6.48	1.15	1.85	0.33
PTO 11083	Apr-04									0.55	0.03	0.55	0.03
ATC/PTO 11224	Sep-04									16.07	2.57	16.07	2.57
PTO 11007	Mar-05									0.59	0.10	0.59	0.10
ATC/PTO 11224-01	Apr-06									0.48	0.08	0.48	0.08
ATC 12091	Oct-06									16.24	2.96	16.24	2.96
ATC 12208	Jan-07									19.84	3.62	19.84	3.62
ATC 12091-01 ²	Mar-07									0.00	0.00	0.00	0.00
ATC 12105	Jun-07	48.53	8.86	10.74	1.96	147.41	26.90	84.63	15.45	151.81	27.32	145.45	26.42
ATC 12208-01 ³	Aug-07									0.00	0.00	0.00	0.00
ATC 12091-02	Sep-07									11.31	2.06	11.31	2.06
ATC 12208-02	Dec-07									7.16	1.31	7.16	1.31
ATC 12315	Jan-08									33.08	1.59	16.06	0.79
ATC 12105-01	Jan-08									57.79	10.55	57.79	10.55
ATC 12091-03	Jun-08									2.06	0.38	2.06	0.38
PTO 12398 ⁴	Jul-08									23.15	4.22	23.15	4.22
PTO 12315	Mar-09										1.43		0.68
PTO 12208	Mar-09									0.49	0.09	0.49	0.09
ATC-Mod 12105-09	TBD									8.23	1.50	8.23	1.50
Totals		48.53	8.86	10.74	1.96	292.81	52.15	88.23	15.68	367.69	65.54	341.34	60.15

- Notes:
1. Stationary source (Lompoc and Celpure Plant) NEI as found in Table 5.6 of P170 PTO 5840-R2 issued 6/24/03
 2. PTE remains the same under modification ATC 12091-01 as PTE under ATC 12091; therefore, no increase in PTE.
 3. PTE remains the same under modification ATC 12208-01 as PTE under ATC 12208; therefore, no increase in PTE.
 4. P1 includes ATC 12398 project plus an increase of 3.35 lb/day PM/PM10 incorporated in PTO 12398.

III. Stationary Source "P2" NEI-90 Decreases

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

Permit No.	Date Issued	NOx		ROC		CO		SOx		PM		PM10	
		lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
PTO 11083	Apr-04									0.24	0.03	0.24	0.03
ATC 12105-01	Jan-08	28.06	5.12	6.21	1.13	85.25	15.56	12.68	2.32	80.84	14.75	80.84	14.75
PTO-Mod 5840-07	TBD									21.25	3.62	9.40	1.52
Totals		28.06	5.12	6.21	1.13	85.25	15.56	12.68	2.32	102.33	18.40	90.48	16.30

IV. Stationary Source Pre-90 "D" Decreases

Enter all stationary source "D" decreases below:

Permit No.	Date Issued	NOx		ROC		CO		SOx		PM		PM10	
		lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
ATC 12105-01 ^{1,2}	Jan-08	20.47	3.74	2.04	0.37	121.90	22.15	75.55	13.36	201.13	38.18	176.05	32.13
Totals		20.47	3.74	2.04	0.37	121.90	22.15	75.55	13.36	201.13	38.18	176.05	32.13

Notes: 1. "D"-Term values in table above excludes reductions which are subject to DOI 047 ERC application (see table below).

This is necessary so that NEI remains non-negative per Rule 801

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

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

V. Calculated Stationary Source NEI-90

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

Term	NOx		ROC		CO		SOx		PM		PM10	
	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr	lb/day	ton/yr
I	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
P1	48.53	8.86	10.74	1.96	292.81	52.15	88.23	15.68	367.69	65.54	341.34	60.15
P2	28.06	5.12	6.21	1.13	85.25	15.56	12.68	2.32	102.33	18.40	90.48	16.30
D	20.47	3.74	2.04	0.37	121.90	22.15	75.55	13.36	201.13	38.18	176.05	32.13
NEI-90	0.00	0.00	2.49	0.46	85.66	14.44	0.00	0.00	64.23	8.95	74.81	11.72

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

ATTACHMENT B

Attachment B - Emission Reduction Calculations Part 70/APCD PTO 5840-07 Celite Corporation - Lompoc Plant										
Equipment Description			PM				PM10			
Equipment Item	Process Line	APCD DeviceNo	lb/day previous	lb/day revised	ton/yr previous	ton/yr revised	lb/day previous	lb/day revised	ton/yr previous	ton/yr revised
3 Automatic Packing Station Baghouse (345)	Line 3	108	45.39	28.80	8.06	5.11	12.97	8.23	2.30	1.46
Crude Bin Ventilation Baghouse	Celpure	8073	2.89	0.12	0.50	0.02	2.89	0.12	0.50	0.02
Soda Ash Bin Baghouse	Celpure	8074	0.62	0.31	0.01	0.01	0.62	0.31	0.01	0.01
Alternate Materials Baghouse	Celpure	8081	0.79	0.00	0.10	0.00	0.79	0.00	0.10	0.00
DE Bin Baghouse	Celpure	8080	0.79	0.00	0.10	0.00	0.79	0.00	0.10	0.00
Totals			50.48	29.23	8.76	5.14	18.06	8.66	3.00	1.49
Total P2 Decreases			21.25 lb/day		3.62 ton/yr		9.40 lb/day		1.52 ton/yr	

ATTACHMENT C

The following are the APCD responses to comments on the draft permit by Celite in the letter dated February 23, 2010:

1. Celite Comment: Page 6, Condition C.1. The 345BH is listed as being part of Process Line 3. Celite notes that this baghouse operates independent of the 3 System.

APCD Response: Comment noted. Process line entry for 345BH corrected to reflect use on multiple process lines.

2. Celite Comment: Page 6, Condition C.1.(c)(i). Celite will resubmit the process monitor plan under the new title "Process Monitor Plan for PTO Mod 5840-07, including 345BH and 773BH".

APCD Response: Plan title updated to reflect most recent submittal.

3. Celite Comment: Page 7, Condition C.1.(e)(ii)

Celite requests the requirement for reporting the daily average airflow rate of BH345 be modified to be a report of the peak monthly airflow rate of BH345. As described in the Process Monitor Plan for 345BH and 773BH, the airflow to BH345 will be continuously monitored and recorded. Celite proposes that submittal of the peak airflow will effectively prove to the District that airflow has not exceeded the 20,000 scfm limit. Celite PI Server will retain the backup individual hourly and daily data.

APCD Response: The reporting condition was modified to require the peak air flow rate (on a second-by-second basis) rather than the average, but this requirement shall be reported on a weekly basis.

4. Celite Comment: Table 4 Long Term Emissions and Attachment B

Celite notes that the ton per year emissions for the Soda Ash Baghouse are listed as 0.01 tpy for both PM and PM10. Celite calculates the maximum PM and PM10 potential to emit from this baghouse as 0.003 tpy based on the annual operating hours of 416 hours per year. Please confirm value or list to three significant figures so that we may track on the written permit.

APCD Response: Soda Ash baghouse and Crude Bin Vent baghouse long term emission tables have been revised to show three significant figures.