



SEP 01 2016

Mr. Ron Knoepfle
Barbosa Cabinets, Inc.
2020 E. Grant Line Road
Tracy, CA 95304

**Re: Proposed Authority to Construct/Certificate of Conformity (Minor Mod)
District Facility # N-4065
Project # N-1161519**

Dear Mr. Knoepfle:

Enclosed for your review is the District's analysis of an application for Authorities to Construct for the facility identified above. You requested that Certificates of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. The modification involves limiting the hours of operation of a countertop manufacturing operation when served by a LMC 360 IRWD baghouse to eight (8) hours per day and revising the allowable pressure differential range on baghouse pressure gauges.

After addressing all comments made during the 45-day EPA comment period, the District intends to issue the Authorities to Construct with Certificates of Conformity. Prior to operating with modifications authorized by the Authorities to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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Mr. Ron Knoepfle
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Thank you for your cooperation in this matter.

Sincerely,


Arnaud Marjollet
Director of Permit Services

Enclosures

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

San Joaquin Valley Air Pollution Control District
Authority to Construct Application Review
Modification to Woodworking Operation

Facility Name:	Barbosa Cabinets, Inc.	Date:	August 25, 2016
Mailing Address:	2020 E. Grant Line Road Tracy, CA 95304	Engineer:	Steve Leonard
		Lead Engineer:	Richard Karrs August 29, 2016
Contact Person:	Ron Knoepfle		
Telephone:	209-830-3524		
Cell:	209-407-7285		
E-Mail:	Ron.knoepfle@barcab.com		
Application #(s):	N-4065-5-4, '-6-4		
Project #:	N-1161519		
Deemed Complete:	July 14, 2016		

I. Proposal

Barbosa Cabinets, Inc. (Barbosa) currently operates wood working equipment under Permits to Operate N-4065-5-3 and N-4065-6-3. Each operation is served by a large baghouse. The following modifications are proposed:

N-4065-5-4:

At times, the facility operates its countertop manufacturing equipment but not the remainder of the equipment operating under this permit. The countertop operation consists of eight currently permitted saws and two currently permitted shapers. They normally operate the large baghouse during this scenario. When only the countertop manufacturing section is in operation, the equipment listed is served by a smaller LMC 360 IRWD 915 RBO 36-15 baghouse. The large baghouse and the smaller baghouse do not operate simultaneously. During normal operation, the large baghouse will serve all of the permitted equipment, including the countertop manufacturing equipment. To satisfy the requirements of 40 CFR Part 64, Compliance Assurance Monitoring (CAM), the countertop manufacturing operation will only operate a maximum of eight hours per day when served by the smaller baghouse. Additionally, the baghouses are sized that filter loading and back pressure readings are generally lower than the values listed on the current permit. In this project the minimum pressure shall be lowered from 2 inches of water column pressure to 0.5 inches of water column pressure.

N-4064-6-4:

The woodworking operation is served by a LMC 594-LP-12 baghouse. The baghouse is sized that filter loading and back pressure readings are generally lower than the values listed on the current permit. In this project the minimum pressure shall be lowered from 2 inches of water column pressure to 0.5 inches of water column pressure.

Barbosa received their Title V Permit on November 10, 2014. This modification can be classified as a Title V minor modification pursuant to Rule 2520, and can be processed with a Certificate of Conformity (COC). Since the facility has specifically requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct. Barbosa must apply to administratively amend their Title V Permit.

II. Applicable Rules

Rule 2201	New and Modified Stationary Source Review Rule (2/18/16)
Rule 2410	Prevention of Significant Deterioration (6/16/11)
Rule 2520	Federally Mandated Operating Permits (6/21/01)
Rule 4101	Visible Emissions (2/17/05)
Rule 4102	Nuisance (12/17/92)
Rule 4201	Particulate Matter Concentration (12/17/92)
Rule 4202	Particulate Matter – Emission Rate (12/17/92)
CH&SC 42301.6	School Notice
Public Resources Code 21000-21177:	California Environmental Quality Act (CEQA)
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387:	CEQA Guidelines
40 CFR Part 64	Compliance Assurance Monitoring (CAM)

III. Project Location

The facility is located at 2020 Grant Line Road in Tracy, CA. The equipment is not located within 1,000 feet of the outer boundary of a K-12 school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

IV. Process Description

Wood is formed into commercial and residential cabinet parts utilizing various types of woodworking equipment. The particulate matter generated is controlled by industrial baghouses.

V. Equipment Listing

Pre-Project Equipment Description:

- N-4065-5-3: WOODWORKING OPERATION CONSISTING OF 19 SAWS, 2 BORING MACHINES, 1 DOWEL INSERTER, 3 HINGE INSERTERS, 5 SANDERS, 2 TENONERS, 1 PLANER, 3 ROUTERS, 13 SHAPERS, 3 MOLDERS AND 3 SHAPE AND SAND MACHINES ALL SERVED BY AN LMC MODEL 594-LP-12 BAGHOUSE. WHEN OPERATING ALONE, THE COUNTERTOP MANUFACTURING PORTION OF THE EQUIPMENT WILL BE SERVED BY THE LMC 594-LP-12 BAGHOUSE OR AN LMC 360 IRWD 915 RBO 36-15 BAGHOUSE. THE COUNTERTOP MANUFACTURING OPERATION CONSISTS OF 8 OF THE ABOVE LISTED SAWS AND TWO OF THE ABOVE LISTED SHAPERS
- N-4065-6-3: WOOD WORKING OPERATION CONSISTING OF 39 SAWS, 4 BORING MACHINES, 2 DOWEL INSERTERS, 5 HINGE INSERTERS, 13 SANDERS, 1 PLANER, 1 PLANER/SANDER, 3 DRILLS, 2 DRILL ROUTERS, 1 SHAPER, 1 SHAPER/SANDER, 2 JOINTERS AND 3 EDGE BANDERS AND FILTER CLEANING BOOTH ALL SERVED BY AN LMC MODEL 594-LP-12 BAGHOUSE

Proposed Modification:

- N-4065-5-4: MODIFICATION OF WOODWORKING OPERATION CONSISTING OF 19 SAWS, 2 BORING MACHINES, 1 DOWEL INSERTER, 3 HINGE INSERTERS, 5 SANDERS, 2 TENONERS, 1 PLANER, 3 ROUTERS, 13 SHAPERS, 3 MOLDERS AND 3 SHAPE AND SAND MACHINES ALL SERVED BY AN LMC MODEL 594-LP-12 BAGHOUSE. WHEN OPERATING ALONE, THE COUNTERTOP MANUFACTURING PORTION OF THE EQUIPMENT WILL BE SERVED BY THE LMC 594-LP-12 BAGHOUSE OR AN LMC 360 IRWD 915 RBO 36-15 BAGHOUSE. THE COUNTERTOP MANUFACTURING OPERATION CONSISTS OF 8 OF THE ABOVE LISTED SAWS AND TWO OF THE ABOVE LISTED SHAPERS: LIMIT HOURS OF OPERATION FOR EQUIPMENT SERVED BY LMC 360 IRWD 915 RBO 36-15 BAGHOUSE TO 2 HOURS/DAY AND REVISE THE PRESSURE DIFFERENTIAL RANGE ON THE LMC 594-LP-12 BAGHOUSE
- N-4065-6-4: MODIFICATION OF WOOD WORKING OPERATION CONSISTING OF 39 SAWS, 4 BORING MACHINES, 2 DOWEL INSERTERS, 5 HINGE INSERTERS, 13 SANDERS, 1 PLANER, 1 PLANER/SANDER, 3 DRILLS, 2 DRILL ROUTERS, 1 SHAPER, 1 SHAPER/SANDER, 2 JOINTERS AND 3 EDGE BANDERS AND FILTER CLEANING BOOTH ALL SERVED BY AN LMC MODEL 594-LP-12 BAGHOUSE: REVISE BAGHOUSE PRESSURE DIFFERENTIAL RANGE

Post Project Equipment Description:

N-4065-5-4: WOODWORKING OPERATION CONSISTING OF 19 SAWS, 2 BORING MACHINES, 1 DOWEL INSERTER, 3 HINGE INSERTERS, 5 SANDERS, 2 TENONERS, 1 PLANER, 3 ROUTERS, 13 SHAPERS, 3 MOLDERS AND 3 SHAPE AND SAND MACHINES ALL SERVED BY AN LMC MODEL 594-LP-12 BAGHOUSE. WHEN OPERATING ALONE, THE COUNTERTOP MANUFACTURING PORTION OF THE EQUIPMENT WILL BE SERVED BY THE LMC 594-LP-12 BAGHOUSE OR AN LMC 360 IRWD 915 RBO 36-15 BAGHOUSE. THE COUNTERTOP MANUFACTURING OPERATION CONSISTS OF 8 OF THE ABOVE LISTED SAWS AND TWO OF THE ABOVE LISTED SHAPERS

N-4065-6-4: WOOD WORKING OPERATION CONSISTING OF 39 SAWS, 4 BORING MACHINES, 2 DOWEL INSERTERS, 5 HINGE INSERTERS, 13 SANDERS, 1 PLANER, 1 PLANER/SANDER, 3 DRILLS, 2 DRILL ROUTERS, 1 SHAPER, 1 SHAPER/SANDER, 2 JOINTERS AND 3 EDGE BANDERS AND FILTER CLEANING BOOTH ALL SERVED BY AN LMC MODEL 594-LP-12 BAGHOUSE

VI. Emission Control Technology Evaluation

Particulate matter less than 10 microns in aerodynamic diameter (PM_{10}) are the only pollutant of concern emitted from the woodworking and countertop manufacturing operations. The three baghouse dust collector controls emission points for the entire facility. The baghouse is expected to have a control efficiency of 99% if properly designed.

The existing baghouses are functioning properly. The minimum filter loading pressure, as read on the magnahelic gauge, has proven to be lower than described in the current permit conditions, indicating sufficient filter count and cleaning intervals. Lowering the minimum pressure reading range will not affect performance.

VII. General Calculations

A. Assumptions

- All baghouses are existing units with no modifications
- Baghouse $PM_{2.5}$ and PM_{10} emissions are based on CFM and grain loading (gr/dscf)
- Revised lower pressure gauge limit has no impact on emissions
- LMC 594-LP-12 Baghouses can operate up to 24 hours/day
- LMC 360 IRWD 915 RBO 36-15 Baghouse operates up to 8 hours/day
- Baghouse efficiency conservatively assumed at 99% control of PM_{10}

To streamline emission calculations, $PM_{2.5}$ emissions are assumed to be equal to PM_{10} emissions. Only if needed to determine if a project is a Federal major modification for $PM_{2.5}$, will specific $PM_{2.5}$ emission calculations be performed.

B. Emission Factors

LMC 594-LP-12 BAGHOUSE:

90,000 dscfm and 0.003 gr-PM₁₀/dscf (current PTO)

LMC 360 IRWD 915 RBO 36-15 BAGHOUSE: (current PTO)

4,800 dscfm and 0.004 gr-PM₁₀/dscf

C. Calculations

1. Pre-Project Potential to Emit (PE1)

The potential to emit for the operation is calculated as follows, and summarized in the table below:

N-4065-5-3:

$$PE1_{\text{woodworking operation}} = PE1_{594\text{-LP-12 Baghouse}} + PE1_{360\text{ IRWD 915 Baghouse}}$$

LMC 594-LP-12 Baghouse:

$$\begin{aligned} PE_1 &= (90,000 \text{ dscfm})(0.003 \text{ gr-PM}_{10}/\text{dscf})(1 \text{ lbs}/7,000 \text{ gr})(1,440 \text{ min}/\text{day}) \\ &= 55.5 \text{ lbs-PM}_{10}/\text{day} \end{aligned}$$

$$\begin{aligned} PE_1 &= (55.5 \text{ lbs-PM}_{10}/\text{day})(365 \text{ days}/\text{year}) \\ &= 20,273 \text{ lbs-PM}_{10}/\text{year} \end{aligned}$$

LMC 360 IRWD 915 Baghouse:

$$\begin{aligned} PE_1 &= (4,800 \text{ dscfm})(0.004 \text{ gr-PM}_{10}/\text{dscf})(1 \text{ lbs}/7,000 \text{ gr})(1,440 \text{ min}/\text{day}) \\ &= 3.9 \text{ lbs-PM}_{10}/\text{day} \end{aligned}$$

$$\begin{aligned} PE_1 &= (3.9 \text{ lbs-PM}_{10}/\text{day})(365 \text{ days}/\text{year}) \\ &= 1,442 \text{ lbs-PM}_{10}/\text{year} \end{aligned}$$

The baghouses will not operate simultaneously, but they could operate during the same day. Since both the emission factor and the flow rate are different for each baghouse, the worst case emissions scenario is not obvious. The first step in determining the worst case emissions scenario will be to calculate the hourly emissions from each unit.

LMC 594-LP-12 Baghouse:

Flow Rate: 90,000 dscf/min

EF_{PM10}: 0.003 gr/dscf

$$PE1_{PM10} = (90,000 \text{ dscf}/\text{min})(0.003 \text{ gr}/\text{dscf})(60 \text{ min}/\text{hr})(\text{lb}/7000 \text{ gr}) = 2.3 \text{ lb}/\text{hr}$$

LMC 360 IRWD 915 Baghouse:

Flow Rate: 4,800 dscf/min
 EF_{PM10}: 0.004 gr/dscf

$$PE_{1PM10} = (4,800 \text{ dscf/min})(0.004 \text{ gr/dscf})(60 \text{ min/hr})(\text{lb}/7000 \text{ gr}) = 0.2 \text{ lb/hr}$$

Worst Case Scenario:

As can be seen, the hourly emissions from the currently permitted operating scenario of the LMC 594-LP-12 Baghouse operating 24 hrs./day are worst case. The daily potential to emit is:

$$PE_{1PM10} = (90,000 \text{ dscf/min})(0.003 \text{ gr/dscf})(1,440 \text{ min/day})(1 \text{ lb}/7,000 \text{ gr}) = 55.5 \text{ lb/day}$$

PE1		
Pollutant	Daily Emissions (lb/day)	Annual Emissions (lb/year)
PM ₁₀	55.5	20,273

N-4065-6-3:

LMC 594-LP-12 Baghouse:

$$PE_1 = (90,000 \text{ dscfm})(0.003 \text{ gr-PM}_{10}/\text{dscf})(1 \text{ lbs}/7,000 \text{ gr})(1,440 \text{ min/day}) = 55.5 \text{ lbs-PM}_{10}/\text{day}$$

$$PE_1 = (55.5 \text{ lbs-PM}_{10}/\text{day})(365 \text{ days/year}) = 20,273 \text{ lbs-PM}_{10}/\text{year}$$

PE1		
Pollutant	Daily Emissions (lb/day)	Annual Emissions (lb/year)
PM ₁₀	55.5	20,273

2. Post Project Potential to Emit (PE2)

The potential to emit for the operation is calculated as follows, and summarized in the table below:

N-4065-5-3:

$$PE_{2\text{woodworking operation}} = PE_{2594-LP-12 \text{ Baghouse}} + PE_{2360 \text{ IRWD 915 Baghouse}}$$

LMC 594-LP-12 Baghouse:

$$\begin{aligned} PE_2 &= (90,000 \text{ dscfm})(0.003 \text{ gr-PM}_{10}/\text{dscf})(1 \text{ lbs}/7,000 \text{ gr})(1,440 \text{ min}/\text{day}) \\ &= 55.5 \text{ lbs-PM}_{10}/\text{day} \end{aligned}$$

$$\begin{aligned} PE_2 &= (55.5 \text{ lbs-PM}_{10}/\text{day})(365 \text{ days}/\text{year}) \\ &= 20,273 \text{ lbs-PM}_{10}/\text{year} \end{aligned}$$

LMC 360 IRWD 915 Baghouse:

$$\begin{aligned} PE_2 &= (4,800 \text{ dscfm})(0.004 \text{ gr-PM}_{10}/\text{dscf})(1 \text{ lbs}/7,000 \text{ gr})(480 \text{ min}/\text{day}) \\ &= 1.3 \text{ lbs-PM}_{10}/\text{day} \end{aligned}$$

$$\begin{aligned} PE_2 &= (1.3 \text{ lbs-PM}_{10}/\text{day})(365 \text{ days}/\text{year}) \\ &= 480 \text{ lbs-PM}_{10}/\text{year} \end{aligned}$$

The baghouses will not operate simultaneously, but they could operate during the same day. Since both the emission factor and the flow rate are different for each baghouse, the worst case emissions scenario is not obvious. The first step in determining the worst case emissions scenario will be to calculate the hourly emissions from each unit.

LMC 594-LP-12 Baghouse:

Flow Rate: 90,000 dscf/min
EF_{PM10}: 0.003 gr/dscf

$$PE_{2PM10} = (90,000 \text{ dscf}/\text{min})(0.003 \text{ gr}/\text{dscf})(60 \text{ min}/\text{hr})(\text{lb}/7000 \text{ gr}) = 2.3 \text{ lb}/\text{hr}$$

LMC 360 IRWD 915 Baghouse:

Flow Rate: 4,800 dscf/min
EF_{PM10}: 0.004 gr/dscf

$$PE_{2PM10} = (4,800 \text{ dscf}/\text{min})(0.004 \text{ gr}/\text{dscf})(60 \text{ min}/\text{hr})(\text{lb}/7000 \text{ gr}) = 0.2 \text{ lb}/\text{hr}$$

Worst Case Scenario:

As can be seen, the hourly emissions from the currently permitted operating scenario of the LMC 594-LP-12 Baghouse operating 24 hrs./day are worst case. The daily potential to emit is:

$$\begin{aligned} PE_{2PM10} &= (90,000 \text{ dscf}/\text{min})(0.003 \text{ gr}/\text{dscf})(1,440 \text{ min}/\text{day})(1 \text{ lb}/7,000 \text{ gr}) \\ &= 55.5 \text{ lb}/\text{day} \end{aligned}$$

PE2		
Pollutant	Daily Emissions (lb/day)	Annual Emissions (lb/year)
PM ₁₀	55.5	20,273

N-4065-6-3:

LMC 594-LP-12 Baghouse:

$$PE_2 = (90,000 \text{ dscfm})(0.003 \text{ gr-PM}_{10}/\text{dscf})(1 \text{ lbs}/7,000 \text{ gr})(1,440 \text{ min}/\text{day})$$

$$= 55.5 \text{ lbs-PM}_{10}/\text{day}$$

$$PE_2 = (55.5 \text{ lbs-PM}_{10}/\text{day})(365 \text{ days}/\text{year})$$

$$= 20,273 \text{ lbs-PM}_{10}/\text{year}$$

PE2		
Pollutant	Daily Emissions (lb/day)	Annual Emissions (lb/year)
PM ₁₀	55.5	20,273

3. Pre-Project Stationary Source Potential to Emit (SSPE1)

Pursuant to District Rule 2201, the SSPE1 is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of Emission Reduction Credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions (AER) that have occurred at the source, and which have not been used on-site.

SSPE1 (lb/year)							
Permit Unit	NO _x	SO _x	PM ₁₀	CO	VOC		
N-4065-5-3	0	0	29,200 ¹	0	40,000 ¹		
N-4065-6-3	0	0		0			
N-4065-7-1	0	0		0			
N-4065-8-1	0	0		0			
N-4065-9-1	0	0		0			
N-4065-10-1	0	0		0			
N-4065-11-1	0	0		0			
N-4065-12-1	0	0		0			
N-4065-13-1	0	0		0			
N-4065-14-1	0	0		0			
N-4065-15-1	0	0		0			
N-4065-16-1	147	1		16			
SSPE1	147	1		29,200		16	40,000

4. Post Project Stationary Source Potential to Emit (SSPE2)

Pursuant to District Rule 2201, the SSPE2 is the PE from all units with valid ATCs or PTOs at the Stationary Source and the quantity of ERCs which have been banked since September 19, 1991 for AER that have occurred at the source, and which have not been used on-site.

¹ The facility has specific limiting conditions for VOC and PM₁₀ of 40,000 lb/yr and 29,200 lb/yr respectively.

SSPE2 (lb/year)					
Permit Unit	NO _x	SO _x	PM ₁₀	CO	VOC
N-4065-5-4	0	0	29,200 ²	0	40,000 ²
N-4065-6-4	0	0		0	
N-4065-7-1	0	0		0	
N-4065-8-1	0	0		0	
N-4065-9-1	0	0		0	
N-4065-10-1	0	0		0	
N-4065-11-1	0	0		0	
N-4065-12-1	0	0		0	
N-4065-13-1	0	0		0	
N-4065-14-1	0	0		0	
N-4065-15-1	0	0		0	
N-4065-16-1	147	1		16	
SSPE2	147	1		29,200	

5. Major Source Determination

Rule 2201 Major Source Determination:

Pursuant to District Rule 2201, a Major Source is a stationary source with a SSPE2 equal to or exceeding one or more of the following threshold values. For the purposes of determining major source status the following shall not be included:

- any ERCs associated with the stationary source
- Emissions from non-road IC engines (i.e. IC engines at a particular site at the facility for less than 12 months)
- Fugitive emissions, except for the specific source categories specified in 40 CFR 51.165

² The facility has specific limiting conditions for VOC and PM₁₀ of 40,000 lb/yr and 29,200 lb/yr respectively.

Rule 2201 Major Source Determination (lb/year)						
	NO_x	SO_x	PM₁₀	PM_{2.5}	CO	VOC
SSPE1	147	1	29,200	29,200	16	40,000
SSPE2	147	1	29,200	29,200	16	40,000
Major Source Threshold	20,000	140,000	140,000	140,000	200,000	20,000
Major Source?	No	No	No	No	No	Yes

Note: PM2.5 assumed to be equal to PM10

This source is an existing Major Source for VOC emissions and will remain a Major Source for VOC. No change in other pollutants are proposed or expected as a result of this project.

Rule 2410 Major Source Determination:

The facility or the equipment evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21 (b)(1)(iii). Therefore the PSD Major Source threshold is 250 tpy for any regulated NSR pollutant.

PSD Major Source Determination (tons/year)						
	NO₂	VOC	SO₂	CO	PM	PM₁₀
Estimated Facility PE before Project Increase	0	20	0	0	15	15
PSD Major Source Thresholds	250	250	250	250	250	250
PSD Major Source ? (Y/N)	N	N	N	N	N	N

As shown above, the facility is not an existing PSD major source for any regulated NSR pollutant expected to be emitted at this facility.

6. Baseline Emissions (BE)

The BE calculation (in lb/year) is performed pollutant-by-pollutant for each unit within the project to calculate the QNEC, and if applicable, to determine the amount of offsets required.

Pursuant to District Rule 2201, BE = PE1 for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,

- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, located at a Major Source.

otherwise,

BE = Historic Actual Emissions (HAE), calculated pursuant to District Rule 2201.

This project involves equipment that has only PM10 emissions, therefore, BE will be determined only for PM10. The facility is a non-Major source for PM10. Per section 3.7 of District Rule 2201, the BE for non-Major Source pollutants is equal to the potential to emit of that pollutant.

The potential PM10 emissions from each operation involved in this project is 20,273 lb/yr but the facility SLC for PM10 is 29,200 lb/yr. The Baseline Emissions for PM10 are 29,200 lb/yr.

7. SB 288 Major Modification

SB 288 Major Modification is defined in 40 CFR Part 51.165 as "any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act."

Since this facility is not a major source for any of the pollutants addressed in this project, this project does not constitute an SB 288 major modification.

8. Federal Major Modification

District Rule 2201 states that a Federal Major Modification is the same as a "Major Modification" as defined in 40 CFR 51.165 and part D of Title I of the CAA.

Since this facility is not a major source for any of the pollutants addressed in this project, this project does not constitute a Federal Major Modification.

9. Rule 2410 – Prevention of Significant Deterioration (PSD) Applicability Determination

Rule 2410 applies to any pollutant regulated under the Clean Air Act, except those for which the District has been classified nonattainment. The pollutants which must be addressed in the PSD applicability determination for sources located in the SJV and which are emitted in this project are: (See 52.21 (b) (23) definition of significant)

- PM
- PM10

I. Project Emissions Increase - New Major Source Determination

The post-project potentials to emit from all new and modified units are compared to the PSD major source thresholds to determine if the project constitutes a new major source subject to PSD requirements.

The facility or the equipment evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21 (b)(1)(i). The PSD Major Source threshold is 250 tpy for any regulated NSR pollutant.

PSD Major Source Determination: Potential to Emit (tons/year)						
	NO2	VOC	SO2	CO	PM	PM10
Total PE from New and Modified Units	0	20	0	0	15	15
PSD Major Source threshold	250	250	250	250	250	250
New PSD Major Source?	N	N	N	N	N	N

As shown in the table above, the potential to emit for the project, by itself, does not exceed any PSD major source threshold. Therefore Rule 2410 is not applicable and no further analysis is required.

10. Quarterly Net Emissions Change (QNEC)

The QNEC is calculated solely to establish emissions that are used to complete the District's PAS emissions profile screen. There are no changes in emissions as a result of this project, therefore; QNEC = 0.

VIII. Compliance Determination

Rule 2201 New and Modified Stationary Source Review Rule

A. Best Available Control Technology (BACT)

1. BACT Applicability

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis. Unless specifically exempted by Rule 2201, BACT shall be required for the following actions*:

- a. Any new emissions unit with a potential to emit exceeding two pounds per day,
- b. The relocation from one Stationary Source to another of an existing emissions unit with a potential to emit exceeding two pounds per day,
- c. Modifications to an existing emissions unit with a valid Permit to Operate resulting in an AIPE exceeding two pounds per day, and/or
- d. Any new or modified emissions unit, in a stationary source project, which results in an SB 288 Major Modification or a Federal Major Modification, as defined by the rule.

*Except for CO emissions from a new or modified emissions unit at a Stationary Source with an SSPE2 of less than 200,000 pounds per year of CO.

a. New emissions units – PE > 2 lb/day

As discussed in Section I above, there are no new emissions units associated with this project. Therefore BACT for new units with PE > 2 lb/day purposes is not triggered.

b. Relocation of emissions units – PE > 2 lb/day

As discussed in Section I above, there are no emissions units being relocated from one stationary source to another; therefore BACT is not triggered.

c. Modification of emissions units – AIPE > 2 lb/day

$$\text{AIPE} = \text{PE}_2 - \text{HAPE}$$

Where,

AIPE = Adjusted Increase in Permitted Emissions, (lb/day)

PE₂ = Post-Project Potential to Emit, (lb/day)

HAPE = Historically Adjusted Potential to Emit, (lb/day)

$$\text{HAPE} = \text{PE}_1 \times (\text{EF}_2/\text{EF}_1)$$

Where,

PE₁ = The emissions unit's PE prior to modification or relocation, (lb/day)

EF₂ = The emissions unit's permitted emission factor for the pollutant after modification or relocation. If EF₂ is greater than EF₁ then EF₂/EF₁ shall be set to 1

EF₁ = The emissions unit's permitted emission factor for the pollutant before the modification or relocation

$$\text{AIPE} = \text{PE}_2 - (\text{PE}_1 * (\text{EF}_2 / \text{EF}_1))$$

$$\begin{aligned} \text{PE}_1 &= (4,800 \text{ dscfm})(0.004 \text{ gr-PM}_{10}/\text{dscf})(1 \text{ lbs}/7,000 \text{ gr})(1,440 \text{ min}/\text{day}) \\ &= 3.9 \text{ lbs-PM}_{10}/\text{day} \end{aligned}$$

$$PE_1 = (3.9 \text{ lbs-PM}_{10}/\text{day})(365 \text{ days/year})$$

$$= 1,442 \text{ lbs-PM}_{10}/\text{year}$$

N-4065-5-4:

LMC 360 IRWD 915 Baghouse:

$$AIPE = 0.3 - (3.9 * (0.004/0.004))$$

$$= 0.3 - 3.9 * 1$$

$$= 0.0 \text{ lb/day}$$

As demonstrated above, the AIPE is not greater than 2.0 lb/day for PM₁₀ emissions for any baghouse. Therefore BACT is not triggered.

d. SB 288/Federal Major Modification

As discussed in Sections VII.C.7 and VII.C.8 above, this project does not constitute an SB 288 and/or Federal Major Modification for NO_x emissions. Therefore BACT is not triggered for any pollutant.

B. Offsets

1. Offset Applicability

Offset requirements shall be triggered on a pollutant by pollutant basis and shall be required if the SSPE2 equals to or exceeds the offset threshold levels in Table 4-1 of Rule 2201.

The SSPE2 is compared to the offset thresholds in the following table.

Offset Determination (lb/year)					
	NO _x	SO _x	PM ₁₀	CO	VOC
SSPE2	147	1	<29,200	16	40,000
Offset Thresholds	20,000	54,750	29,200	200,000	20,000
Offsets triggered?	No	No	No	No	Yes*

*Project does not involve equipment that emits VOCs

2. Quantity of Offsets Required

As seen above, the SSPE2 is not greater than the offset thresholds for PM₁₀, which is the only pollutant involved in this project; therefore offset calculations are not necessary and offsets will not be required for this project.

C. Public Notification

1. Applicability

Public noticing is required for:

- a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications,
- b. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,
- c. Any project which results in the offset thresholds being surpassed, and/or
- d. Any project with an SSiPE of greater than 20,000 lb/year for any pollutant.
- e. Any project which results in a Title V significant permit modification

a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications

New Major Sources are new facilities, which are also Major Sources. Since this is not a new facility, public noticing is not required for this project for New Major Source purposes.

As demonstrated in Sections VII.C.7 and VII.C.8, this project does not constitute an SB 288 or Federal Major Modification; therefore, public noticing for SB 288 or Federal Major Modification purposes is not required.

b. PE > 100 lb/day

Applications which include a new emissions unit with a PE greater than 100 pounds during any one day for any pollutant will trigger public noticing requirements. There are no new emissions units associated with this project. Therefore public noticing is not required for this project for PE > 100 lb/day.

c. Offset Threshold

The SSPE1 and SSPE2 are compared to the offset thresholds in the following table.

Offset Thresholds				
Pollutant	SSPE1 (lb/year)	SSPE2 (lb/year)	Offset Threshold	Public Notice Required?
NO _x	147	147	20,000 lb/year	No
SO _x	1	1	54,750 lb/year	No
PM ₁₀	<29,200	<29,200	29,200 lb/year	No
CO	16	16	200,000 lb/year	No
VOC	40,000	40,000	20,000 lb/year	No

As detailed above, there were no thresholds surpassed with this project; therefore public noticing is not required for offset purposes.

d. SSIPE > 20,000 lb/year

Public notification is required for any permitting action that results in a SSIPE of more than 20,000 lb/year of any affected pollutant. According to District policy, the SSIPE = SSPE2 – SSPE1. The SSIPE is compared to the SSIPE Public Notice thresholds in the following table.

SSIPE Public Notice Thresholds					
Pollutant	SSPE2 (lb/year)	SSPE1 (lb/year)	SSIPE (lb/year)	SSIPE Public Notice Threshold	Public Notice Required?
NO _x	147	147	0	20,000 lb/year	No
SO _x	1	1	0	20,000 lb/year	No
PM ₁₀	<29,200	<29,200	0	20,000 lb/year	No
CO	16	16	0	20,000 lb/year	No
VOC	40,000	40,000	0	20,000 lb/year	No

As demonstrated above, the SSIPEs for all pollutants were less than 20,000 lb/year; therefore public noticing for SSIPE purposes is not required.

2. Public Notice Action

As discussed above, this project will not result in emissions, for any pollutant, which would subject the project to any of the noticing requirements listed above. Therefore, public notice will not be required for this project.

D. Daily Emission Limits (DELs)

DELs and other enforceable conditions are required by Rule 2201 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. The DEL must be contained in the latest ATC and contained in or enforced by the latest PTO and enforceable, in a practicable manner, on a daily basis. DELs are also required to enforce the applicability of BACT.

For this woodworking operation served by two baghouses, the DELs are stated in the form of emission factors (gr-PM₁₀/dscfm), the maximum baghouse exhaust flowrate, and the maximum operational time, 24 hours per day, unless specified differently.

Proposed Rule 2201 (DEL) Conditions:

N-4065-5-4:

- The baghouses shall not operate simultaneously.
- The exhaust flow rate of the LMC 594-LP-12 baghouse shall not exceed 90,000 dscf/min.
- The PM₁₀ emissions from the LMC 594-LP-12 baghouse shall not exceed 0.003 gr/dscf of exhaust flow.
- The exhaust flow rate of the LMC 360 IRWD 915 RBO 36-15 baghouse shall not exceed 4,800 dscf/min.
- The PM₁₀ emissions from the LMC 360 IRWD 915 RBO 36-15 baghouse shall not exceed 0.004 gr/dscf of exhaust flow.
- When countertop manufacturing operation equipment is being served by the LMC 360 IRWD 915 RBO 36-15 baghouse, operation shall not exceed eight (8) hours per day.

N-4065-6-4:

- The baghouse exhaust flow rate shall not exceed 90,000 dscf/min.
- The PM₁₀ emissions shall not exceed 0.003 gr/dscf of exhaust flow.

E. Compliance Assurance

1. Source Testing

The existing LMC 594-LP-12 baghouses were previously source tested as required by the District Source Testing policy (APR-1705). The emissions from the LMC 360 IRWD 915 baghouse is less than the 30 lb/day testing threshold specified in APR-1705, therefore, it need not be source tested.

2. Monitoring

District guidance document FYI 125 requires that baghouse pressure differential gauge readings be monitored daily. The large LMC 594-LP-12 baghouses have pressure gauges, the smaller LMC 360 IRWD 915 baghouse does not have one or require one.

3. Recordkeeping

The emissions from these units will be limited in terms of exhaust flow and PM10 concentration; and the facility has a facility-wide PM10 emission limit. Records of the cumulative annual operating hours of each baghouse, as well as of the cumulative annual facility-wide PM₁₀ emissions will be required. This project imposes a two hour/day operating limit on the countertop making operation when served by the stand-alone LMC 360 IRWD 915 baghouse. Daily recordkeeping of the hours of operation shall be required for this occurrence.

District guidance document FYI 125 requires that records of the daily pressure differential gauge readings and of all filter media change-outs be kept. Such records are currently required.

4. Reporting

No reporting is required to demonstrate compliance with Rule 2201.

Rule 2410 Prevention of Significant Deterioration

As shown in Section VII. C. 9. above, this project does not result in a new PSD major source or PSD major modification. No further discussion is required.

Rule 2520 Federally Mandated Operating Permits

This facility is subject to this Rule, and has received their Title V Operating Permit. The proposed modification is a Minor Modification to the Title V Permit.

In accordance with Rule 2520, these modifications:

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

5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

As discussed above, the facility has applied for a Certificate of Conformity (COC). Therefore, the facility must apply to modify their Title V permit with an administrative amendment prior to operating with the proposed modifications. Continued compliance with this rule is expected. The facility may construct/operate under the ATC upon submittal of the Title V administrative amendment/minor modification application.

Rule 4001 New Source Performance Standards (NSPS)

This rule incorporates NSPS from Part 60, Chapter 1, Title 40, Code of Federal Regulations (CFR); and applies to all new sources of air pollution and modifications of existing sources of air pollution listed in 40 CFR Part 60. However, no subparts of 40 CFR Part 60 apply to woodworking operations.

Rule 4002 National Emission Standards for Hazardous Air Pollutants (NESHAPs)

This rule incorporates NESHAPs from Part 61, Chapter I, Subchapter C, Title 40, CFR and the NESHAPs from Part 63, Chapter I, Subchapter C, Title 40, CFR; and applies to all sources of hazardous air pollution listed in 40 CFR Part 61 or 40 CFR Part 63.

The requirements of 40 CFR Part 63, Subpart JJ (National Emission Standards for Wood Furniture Manufacturing Operations) are applicable to facilities that are a Major HAP source (as defined in 40 CFR 63.2 – Definitions).

The facility is below Major HAP Source thresholds. Therefore, the requirements of this regulation do not apply.

Rule 4101 Visible Emissions

Rule 4101 states that no person shall discharge into the atmosphere emissions of any air contaminant aggregating more than 3 minutes in any hour which is as dark as or darker than Ringelmann 1 (or 20% opacity).

The wood working equipment is served by baghouses that are expected to provide 99% or greater PM10 control. District Policy SSP 1005 requires that the visible emissions from such equipment be limited to less than 5% opacity for a period or periods aggregating more than 3 minutes in any one hour. Continued compliance is expected.

Rule 4102 Nuisance

Rule 4102 prohibits discharge of air contaminants which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected as a result of these operations, provided the equipment is well maintained. Therefore, compliance with this rule is expected.

California Health & Safety Code 41700 (Health Risk Assessment)

District Policy APR 1905 – *Risk Management Policy for Permitting New and Modified Sources* specifies that for an increase in emissions associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite.

As demonstrated above, there are no increases in emissions associated with this project, therefore a health risk assessment is not necessary and no further risk analysis is required.

Rule 4201 Particulate Matter Concentration

This rule limits the particulate matter emission concentration to 0.1 gr/dscf of exhaust flow.

Existing LMC 594-LP-12 Baghouses:

The unit currently serving permit unit N-4065-6 (which is identical to the unit serving permit unit N-4065-5) was source tested and the PM₁₀ emission concentration was shown to be less than 0.001 gr/dscf. The PM₁₀ emissions from each unit will be limited to 0.003 gr/dscf. Since all of the particulate matter emissions from a baghouse would be expected to be PM₁₀, compliance with the total particulate matter emission standard of this rule is expected.

Existing Baghouse LMC 360 IRWD 915 RBO 35-15:

Per District guidance document FYI- 87, the baghouse emission is expected to be 0.004 gr-PM₁₀/dscf of exhaust flow, or less. Compliance is expected.

Rule 4202 Particulate Matter – Emission Rate

Currently Permitted Configuration (N-4065-5 and N-4065-6):

Compliance during operation under the currently permitted configuration was shown during the processing of project N-1061345. No changes to this operating scenario are proposed; therefore, continued compliance is expected.

Countertop Equipment Operating Alone:

Throughput: 0.5 tons/day
Op. Schedule: 2-8 hr/day
Hourly Throughput: 0.5 tons / 2 hr = 0.25 tons/hr
Expected PM: 0.25 lb/hr (VII.C.1 of this document - assumes a PM10 to PM ratio of 1 which is typical for fabric filter collectors)

The applicable equation is:

$E_{\max} = 3.59 P^{0.62}$, where $P < 30$ tons/hr
E = Maximum allowable emissions in lb/hr
P = Process weight in tons/hr (1.56)

$$E_{\max} = 3.59 (0.2)^{0.62} = 1.3 \text{ lb/hr}$$

E_{\max} is higher than the proposed emission rate therefore compliance with this rule is expected.

California Health & Safety Code 42301.6 (School Notice)

The District has verified that this site is not located within 1,000 feet of a school. Therefore, pursuant to California Health and Safety Code 42301.6, a school notice is not required.

California Environmental Quality Act (CEQA)

CEQA requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The District adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities;
- Identify the ways that environmental damage can be avoided or significantly reduced;
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

The District performed an Engineering Evaluation (this document) for the proposed project and determined that all project specific emission unit(s) do not trigger Best Available Control Technology (BACT) and do not trigger Toxic Best Available Control Technology (T-BACT) requirements.

Issuance of permits for emissions units not subject to BACT or T-BACT requirements is a matter of ensuring conformity with applicable District rules and regulations and does not require discretionary judgment or deliberation. Thus, the District concludes that this permitting action constitutes a ministerial approval. Section 21080 of the Public Resources Code exempts from the application of CEQA those projects over which a public agency exercises only ministerial approval. Therefore, the District finds that this project is exempt from the provisions of CEQA.

40 CFR Part 64 Compliance Assurance Monitoring (CAM)

§64.2 — Applicability

This section 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.

a. N-4065-5-3: WOODWORKING OPERATION CONSISTING OF 19 SAWS, 2 BORING MACHINES, 1 DOWEL INSERTER, 3 HINGE INSERTERS, 5 SANDERS, 2 TENONERS, 1 PLANER, 3 ROUTERS, 13 SHAPERS, 3 MOLDERS AND 3 SHAPE AND SAND MACHINES ALL SERVED BY AN LMC MODEL 594-LP-12 BAGHOUSE. WHEN OPERATING ALONE, THE COUNTERTOP MANUFACTURING PORTION OF THE EQUIPMENT WILL BE SERVED BY THE LMC 594-LP-12 BAGHOUSE OR AN LMC 360 IRWD 915 RBO 36-15 BAGHOUSE. THE COUNTERTOP MANUFACTURING OPERATION CONSISTS OF 8 OF THE ABOVE LISTED SAWS AND TWO OF THE ABOVE LISTED SHAPERS

This permit unit has two emissions units, each with an emission limit and an add-on control device (baghouse) for PM₁₀.

Woodworking Operation/LMC Model 594-LP-12 Baghouse:

The post-control PE = 90,000 dscfm x 0.003 gr/dscf x (1 lb/7,000 gr) x 1,440 min/day x 365 days/yr = 20,273 lb-PM₁₀/yr.

Considering a baghouse control efficiency of 99%, the pre-control PE = 20,273 lb/yr / (1 — 0.99) = 2,027,300 lb-PM₁₀/yr.

Since the pre-control PE is greater than the PM₁₀ major source threshold (140,000 lb/yr) CAM is required for this unit and has been satisfied with the previous permitting actions.

Countertop manufacturing operation/LMC 360 IRWD 915 RBO 36-15 Baghouse:

The post-control PE1 = 4,800 dscfm x 0.004 gr/ dscf x (1 lb/7,000 gr) x 1,440 min/day x 365 days/yr = 1,442 lb-PM₁₀/yr.

Considering a baghouse control efficiency of 99%, the pre-control PE1 = 1,442 lb/yr $1(1 - 0.99) = 144,200$ lb-PM₁₀/yr.

Since the pre-control PE1 is greater than the PM₁₀ major source threshold (140,000 lb/yr) CAM is applicable to this unit.

The LMC 360 IRWD 915 RBO 36-15 baghouse is only operated periodically when countertops are being manufactured and the rest of the woodworking processes are idle and using the LMC Model 594-LP-12 baghouse would consume needless amounts of electrical power.

With this project, the potential to emit from the countertop manufacturing operation in stand-alone mode is limited to no more than eight (8) hours per day through an enforceable permit condition.

As such, the post-project PE2 measured at the baghouse = 4,800 dscfm x 0.004 gr/ dscf x (1 lb/7,000 gr) x 480 min/day x 365 days/yr = 480 lb-PM₁₀/yr.

Considering a baghouse control efficiency of 99%³, the pre-control PE2 = 480 lb/yr $1(1 - 0.99) = 48,055$ lb-PM₁₀/yr.

Since the pre-control PE2 is not greater than the PM₁₀ major source threshold (140,000 lb/yr) CAM is not applicable to this operation and the baghouse PM₁₀ control unit.

b. N-4065-6-3: WOOD WORKING OPERATION CONSISTING OF 39 SAWS, 4 BORING MACHINES, 2 DOWEL INSERTERS, 5 HINGE INSERTERS, 13 SANDERS, 1 PLANER, 1 PLANER/SANDER, 3 DRILLS, 2 DRILL ROUTERS, 1 SHAPER, 1 SHAPER/SANDER, 2 JOINTERS AND 3 EDGE BANDERS AND FILTER CLEANING BOOTH ALL SERVED BY AN LMC MODEL 594-LP-12 BAGHOUSE

This unit has an emission limit and an add-on control device (baghouse) for PM₁₀.

The post-control PE = 90,000 dscfm x 0.003 gr/dscf x (1 lb/7,000 gr) x 1,440 min/day x 365 days/yr = 20,273 lb-PM₁₀/yr.

Considering a baghouse control efficiency of 99%, the pre-control PE = 20,273 lb/yr / (1 — 0.99) = 2,027,300 lb/yr.

Since the pre-control PE is greater than the PM₁₀ major source threshold (140,000 lb/yr) CAM is required for this unit and has been satisfied with the previous permitting actions.

IX. Recommendation

Compliance with all applicable rules and regulations is expected. Issue ATCs N-4065-5-4 & '6-4 subject to the permit conditions on the attached draft ATCs in **Appendix A**.

X. Billing Information

Annual Permit Fees			
Permit Number	Fee Schedule	Fee Description	Annual Fee
N-4065-5-4	3020-01-G	1,399 electric hp	\$893.00
N-4065-6-4	3020-01-G	1,173 electric hp	\$893.00

Appendixes

- A: Draft ATCs N-4065-5-4 & '6-4
- B: Current PTOs N-4065-5-3 & '6-3
- C: SSPE Calculations
- D: Emission Profiles
- E: Compliance Certification

APPENDIX A

Draft ATCs N-4065-5-4 & '-6-4

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: N-4065-5-4

LEGAL OWNER OR OPERATOR: BARBOSA CABINETS, INC.
MAILING ADDRESS: 2020 E GRANT LINE RD
TRACY, CA 95304

LOCATION: 2020 E GRANT LINE RD
TRACY, CA 95304

EQUIPMENT DESCRIPTION:

MODIFICATION OF WOODWORKING OPERATION CONSISTING OF 19 SAWS, 2 BORING MACHINES, 1 DOWEL INSERTER, 3 HINGE INSERTERS, 5 SANDERS, 2 TENONERS, 1 PLANER, 3 ROUTERS, 13 SHAPERS, 3 MOLDERS AND 3 SHAPE AND SAND MACHINES ALL SERVED BY AN LMC MODEL 594-LP-12 BAGHOUSE. WHEN OPERATING ALONE, THE COUNTERTOP MANUFACTURING PORTION OF THE EQUIPMENT WILL BE SERVED BY THE LMC 594-LP-12 BAGHOUSE OR AN LMC 360 IRWD 915 RBO 36-15 BAGHOUSE. THE COUNTERTOP MANUFACTURING OPERATION CONSISTS OF 8 OF THE ABOVE LISTED SAWS AND TWO OF THE ABOVE LISTED SHAPERS: LIMIT HOURS OF OPERATION FOR EQUIPMENT SERVED BY LMC 360 IRWD 915 RBO 36-15 BAGHOUSE TO 2 HOURS/DAY AND REVISE THE PRESSURE DIFFERENTIAL RANGE ON THE LMC 594-LP-12 BAGHOUSE

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Visible emissions from the baghouses serving the woodworking equipment shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rules 2201 and 4201] Federally Enforceable Through Title V Permit
4. The baghouses serving this permit unit shall not operate simultaneously. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

Arnaud Marjolle, Director of Permit Services
N-4065-5-4 : Aug 30 2016 1:03PM -- LEONARDS : Joint Inspection NOT Required

5. The exhaust flow rate of the LMC 594-LP-12 baghouse shall not exceed 90,000 dscfm. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The PM10 emissions from the LMC 594-LP-12 baghouse shall not exceed 0.003 gr/dscf of exhaust flow. [District Rules 2201 and 4201] Federally Enforceable Through Title V Permit
7. The exhaust flow rate of the LMC 360 IRWD 915 RBO 36-15 baghouse shall not exceed 4,800 dscfm. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The PM10 emissions from the LMC 360 IRWD 915 RBO 36-15 baghouse shall not exceed 0.004 gr/dscf of exhaust flow. [District Rules 2201 and 4201] Federally Enforceable Through Title V Permit
9. When countertop manufacturing operation equipment is being served by the LMC 360 IRWD 915 RBO 36-15 baghouse, operation shall not exceed eight (8) hours per day. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The LMC 594-LP-12 baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
11. The LMC 594-LP-12 baghouse shall operate at all times with a minimum differential pressure of 0.5 inches of water column and a maximum differential pressure of 4 inches of water column. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
12. The differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
13. 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 Rule 2201] Federally Enforceable Through Title V Permit
14. The baghouses shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E=3.59 \times P^{0.62}$ if P is less than or equal to 30 tons per hour, or $E=17.31 \times P^{0.16}$ if P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
18. Visible emissions from the LMC 594-LP-12 baghouse shall be evaluated using EPA Method 22 for a period of at least 6 minutes at least once during each day that this baghouse is operated. Records of visible emissions evaluations shall be maintained. [40 CFR Part 64] Federally Enforceable Through Title V Permit
19. If visible emissions from the LMC 594-LP-12 baghouse are observed, the permittee shall investigate the cause of visible emissions and take corrective action to minimize emissions and prevent recurrence of emissions as expeditiously as practicable. [40 CFR Part 64] Federally Enforceable Through Title V Permit
20. During each day of operation, the permittee shall record the pressure drop of the LMC 594-LP-12 baghouse, and compare the readings to the acceptable range. Upon detecting any excursion from the acceptable pressure drop range, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [40 CFR Part 64] Federally Enforceable Through Title V Permit
21. 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
22. 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

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CONDITIONS CONTINUE ON NEXT PAGE

23. 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
24. Records of the number of hours of operation of the LMC 594-LP-12 baghouse, on a rolling 12-month basis, shall be kept. The records shall be updated at least monthly. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
25. Records of the number of hours of operation of the LMC 360 IRWD 915 RBO 36-15 baghouse, on a daily basis, shall be kept whenever the baghouse is operated. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
26. Records of all maintenance of the baghouse, including all change outs of filter media, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
27. Records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 1070 and 2520] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: N-4065-6-4

LEGAL OWNER OR OPERATOR: BARBOSA CABINETS, INC.
MAILING ADDRESS: 2020 E GRANT LINE RD
TRACY, CA 95304

LOCATION: 2020 E GRANT LINE RD
TRACY, CA 95304

EQUIPMENT DESCRIPTION:

MODIFICATION OF WOOD WORKING OPERATION CONSISTING OF 39 SAWS, 4 BORING MACHINES, 2 DOWEL INSERTERS, 5 HINGE INSERTERS, 13 SANDERS, 1 PLANER, 1 PLANER/SANDER, 3 DRILLS, 2 DRILL ROUTERS, 1 SHAPER, 1 SHAPER/SANDER, 2 JOINTERS AND 3 EDGE BANDERS AND FILTER CLEANING BOOTH ALL SERVED BY AN LMC MODEL 594-LP-12 BAGHOUSE: REVISE BAGHOUSE PRESSURE DIFFERENTIAL RANGE

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Visible emissions from the baghouses serving the woodworking equipment shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rules 2201 and 4201] Federally Enforceable Through Title V Permit
4. The exhaust flow rate of the baghouse shall not exceed 90,000 dscfm. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The PM10 emissions from the baghouse shall not exceed 0.003 gr/dscf of exhaust flow. [District Rules 2201 and 4201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

DRAFT

Arnaud Marjollet, Director of Permit Services

N-4065-6-4 : Aug 30 2016 1:03PM - LEONARDS : Joint Inspection NOT Required

6. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. The baghouse shall operate at all times with a minimum differential pressure of 0.5 inches of water column and a maximum differential pressure of 4 inches of water column. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
8. The differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
9. 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 Rule 2201] Federally Enforceable Through Title V Permit
10. The baghouse shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E=3.59 \times P^{0.62}$ if P is less than or equal to 30 tons per hour, or $E=17.31 \times P^{0.16}$ if P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
14. Visible emissions from the baghouse shall be evaluated using EPA Method 22 for a period of at least 6 minutes at least once during each day that the woodworking equipment is are operated. Records of visible emissions evaluations shall be maintained. [40 CFR Part 64] Federally Enforceable Through Title V Permit
15. If visible emissions from the baghouse are observed, the permittee shall investigate the cause of visible emissions and take corrective action to minimize emissions and prevent recurrence of emissions as expeditiously as practicable. [40 CFR Part 64] Federally Enforceable Through Title V Permit
16. During each day of operation, the permittee shall record the pressure drops of the baghouse and compare the readings to the acceptable range. Upon detecting any excursion from the acceptable pressure drop range, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [40 CFR Part 64] Federally Enforceable Through Title V Permit
17. 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
18. 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
19. 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
20. Records of the number of hours of operation of each baghouse, on a rolling 12-month basis, shall be kept. The records shall be kept separately for each baghouse and shall be updated at least monthly. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
21. Records of all maintenance of the baghouse, including all change outs of filter media, shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
22. Records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rules 1070 and 2520] Federally Enforceable Through Title V Permit

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APPENDIX B

Current PTOs N-4065-5-3 & '6-3

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-4065-5-3

EXPIRATION DATE: 02/28/2019

EQUIPMENT DESCRIPTION:

WOODWORKING OPERATION CONSISTING OF 19 SAWS, 2 BORING MACHINES, 1 DOWEL INSERTER, 3 HINGE INSERTERS, 5 SANDERS, 2 TENONERS, 1 PLANER, 3 ROUTERS, 13 SHAPERS, 3 MOLDERS AND 3 SHAPE AND SAND MACHINES ALL SERVED BY AN LMC MODEL 594-LP-12 BAGHOUSE. WHEN OPERATING ALONE, THE COUNTERTOP MANUFACTURING PORTION OF THE EQUIPMENT WILL BE SERVED BY THE LMC 594-LP-12 BAGHOUSE OR AN LMC 360 IRWD 915 RBO 36-15 BAGHOUSE. THE COUNTERTOP MANUFACTURING OPERATION CONSISTS OF 8 OF THE ABOVE LISTED SAWS AND TWO OF THE ABOVE LISTED SHAPERS

PERMIT UNIT REQUIREMENTS

1. Visible emissions from the baghouses serving the woodworking equipment shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The baghouses serving this permit unit shall not operate simultaneously. [District Rule 2201] Federally Enforceable Through Title V Permit
3. The exhaust flow rate of the LMC 594-LP-12 baghouse shall not exceed 90,000 dscfm. [District Rule 2202] Federally Enforceable Through Title V Permit
4. The PM10 emissions from the LMC 594-LP-12 baghouse shall not exceed 0.003 gr/dscf of exhaust flow. [District Rules 2201 and 4201] Federally Enforceable Through Title V Permit
5. The exhaust flow rate of the LMC 360 IRWD 915 RBO 36-15 baghouse shall not exceed 4,800 dscfm. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The PM10 emissions from the LMC 360 IRWD 915 RBO 36-15 baghouse shall not exceed 0.004 gr/dscf of exhaust flow. [District Rules 2201 and 4201] Federally Enforceable Through Title V Permit
7. The LMC 594-LP-12 baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
8. The LMC 594-LP-12 baghouse shall operate at all times with a minimum differential pressure of 2 inches of water column and a maximum differential pressure of 4 inches of water column. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
9. The differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
10. 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 Rule 2201] Federally Enforceable Through Title V Permit
11. The baghouses shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [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.

13. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Records of all maintenance of the baghouse, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Records of the number of hours of operation of each baghouse, on a rolling 12-month basis, shall be kept. The records shall be kept separately for each baghouse and shall be updated at least monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E=3.59 \times P^{0.62}$ if P is less than or equal to 30 tons per hour, or $E=17.31 \times P^{0.16}$ if P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
18. Visible emissions from the LMC 594-LP-12 baghouse shall be evaluated using EPA Method 22 for a period of at least 6 minutes at least once during each day that this baghouse is operated. Records of visible emissions evaluations shall be maintained. [40 CFR Part 64] Federally Enforceable Through Title V Permit
19. If visible emissions from the LMC 594-LP-12 baghouse are observed, the permittee shall investigate the cause of visible emissions and take corrective action to minimize emissions and prevent recurrence of emissions as expeditiously as practicable. [40 CFR Part 64] Federally Enforceable Through Title V Permit
20. During each day of operation, the permittee shall record the pressure drop of the LMC 594-LP-12 baghouse, and compare the readings to the acceptable range. Upon detecting any excursion from the acceptable pressure drop range, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [40 CFR Part 64] Federally Enforceable Through Title V Permit
21. 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
22. 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
23. 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
24. Within 6 months of this initial Title V permit being issued, the permittee shall apply for, and fully implement, an Authority to Construct to reduce the pre-control potential to emit for PM10 emissions from the countertop manufacturing operation when controlled by the LMC 360 IRWD 915 RBO 36-15 baghouse to a level not greater than the major source threshold; or submit a Compliance Assurance Monitoring plan for PM10 emissions from the countertop manufacturing operation when controlled by the LMC 360 IRWD 915 RBO 36-15 baghouse pursuant to the requirements of 40 CFR Part 64. [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-4065-6-3

EXPIRATION DATE: 02/28/2019

EQUIPMENT DESCRIPTION:

WOOD WORKING OPERATION CONSISTING OF 39 SAWS, 4 BORING MACHINES, 2 DOWEL INSERTERS, 5 HINGE INSERTERS, 13 SANDERS, 1 PLANER, 1 PLANER/SANDER, 3 DRILLS, 2 DRILL ROUTERS, 1 SHAPER, 1 SHAPER/SANDER, 2 JOINTERS AND 3 EDGE BANDERS AND FILTER CLEANING BOOTH ALL SERVED BY AN LMC MODEL 594-LP-12 BAGHOUSE

PERMIT UNIT REQUIREMENTS

1. Visible emissions from the baghouses serving the woodworking equipment shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The exhaust flow rate of the baghouse shall not exceed 90,000 dscfm. [District Rule 2202] Federally Enforceable Through Title V Permit
3. The PM10 emissions from the baghouse shall not exceed 0.003 gr/dscf of exhaust flow. [District Rules 2201 and 4201] Federally Enforceable Through Title V Permit
4. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
5. The baghouse shall operate at all times with a minimum differential pressure of 2 inches of water column and a maximum differential pressure of 4 inches of water column. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
6. The differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
7. 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 Rule 2201] Federally Enforceable Through Title V Permit
8. The baghouse shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Records of all maintenance of the baghouse, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Records of the number of hours of operation of each baghouse, on a rolling 12-month basis, shall be kept. The records shall be kept separately for each baghouse and shall be updated at least monthly. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

14. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E=3.59 \times P^{0.62}$ if P is less than or equal to 30 tons per hour, or $E=17.31 \times P^{0.16}$ if P is greater than 30 tons per hour. [District Rule 4202] Federally Enforceable Through Title V Permit
15. Visible emissions from the baghouse shall be evaluated using EPA Method 22 for a period of at least 6 minutes at least once during each day that the woodworking equipment is are operated. Records of visible emissions evaluations shall be maintained. [40 CFR Part 64] Federally Enforceable Through Title V Permit
16. If visible emissions from the baghouse are observed, the permittee shall investigate the cause of visible emissions and take corrective action to minimize emissions and prevent recurrence of emissions as expeditiously as practicable. [40 CFR Part 64] Federally Enforceable Through Title V Permit
17. During each day of operation, the permittee shall record the pressure drops of the baghouse and compare the readings to the acceptable range. Upon detecting any excursion from the acceptable pressure drop range, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [40 CFR Part 64] Federally Enforceable Through Title V Permit
18. 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
19. 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
20. 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

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

APPENDIX C

SSPE Calculations

Detailed SSPE Report

Region	Facility	Unit	Mod	NOx	SOx	PM10	CO	VOC	Number of Outstanding ATCs
N	4065	0	1						0
N	4065	5	3	0	0	29200	0	0	0
N	4065	6	3	0	0	0	0	0	0
N	4065	7	1	0	0	0	0	40000	0
N	4065	8	1	0	0	0	0	0	0
N	4065	9	1	0	0	0	0	0	0
N	4065	10	1	0	0	0	0	0	0
N	4065	11	1	0	0	0	0	0	0
N	4065	12	1	0	0	0	0	0	0
N	4065	13	1	0	0	0	0	0	0
N	4065	14	1	0	0	0	0	0	0
N	4065	15	1	0	0	0	0	0	0
N	4065	16	1	147	1	2	16	5	0
SSPE (lbs)				147	1	29202	16	40005	

Thursday, August 25, 2016

Page 1 of 1

Notes:

Blank values for a particular permit unit do not necessarily reflect zero emissions. For units with blank values, the PE must still be determined based on physical PE or as limited by permit condition.

For permits that show outstanding ATCs, consult PAS ATC Emission Profile records to determine what the highest PE is for each pollutant.

ATCs for new units (e.g. S-XXXX-X-0) must be added in separately.

ERC's for onsite reductions must be added in separately per Rule 2201 as well.

APPENDIX D

Emission Profiles

Permit #: N-4065-6-4	Last Updated
Facility: BARBOSA CABINETS, INC.	08/25/2016 LEONARDS

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	0.0
Daily Emis. Limit (lb/Day)	0.0	0.0	55.5	0.0	0.0
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: N-4065-5-4	Last Updated
Facility: BARBOSA CABINETS, INC.	08/25/2016 LEONARDS

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	29200.0	0.0	0.0
Daily Emis. Limit (lb/Day)	0.0	0.0	55.5	0.0	0.0
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	0.0	0.0	0.0
Q2:	0.0	0.0	0.0	0.0	0.0
Q3:	0.0	0.0	0.0	0.0	0.0
Q4:	0.0	0.0	0.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

APPENDIX E
Compliance Certification



San Joaquin Valley Unified Air Pollution Control District



TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: Barbosa Cabinets, Inc.	FACILITY ID: N -4065
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name:	
3. Agent to the Owner:	

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

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

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

Ron Barbosa
Signature of Responsible Official

4/22/16
Date

Ron BARBOSA
Name of Responsible Official (please print)

EXECUTIVE VICE PRESIDENT
Title of Responsible Official (please print)

**San Joaquin Valley
Unified Air Pollution Control District**

Certification of Truth and Accuracy

Company Name:	Facility ID: -
---------------	----------------

I declare, under penalty of perjury under the laws of the state of California that based on information and belief formed after reasonable inquiry, the statements and information provided in the document are true, accurate, and complete:

Ron Barbosa

Signature of Responsible Official

4/22/16

Date

RON BARBOSA

Name of Responsible Official (please print)

EXECUTIVE VICE PRESIDENT

Title of Responsible Official (please print)