



JUL 08 2015

Mr. Tony Cordova
South Kern Industrial Center, LLC
PO Box 265
Taft, CA

**Re: Proposed Authority to Construct/Certificate of Conformity (Minor Mod)
District Facility # S-4212
Project # 1150493**

Dear Mr. Cordova:

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 Authorities to Construct authorize modification of biosolids co-composting operation S-4212-2 by converting the aerated static pile (ASP) control system from a negatively aerated system to a positively aerated system.

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

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

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

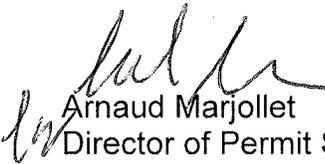
Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

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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

facility is located near Taft in Section 24, T325, R25E. 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

Composting is a biological process where organic materials (e.g. tree trimmings, leaves, biosolids, manure, food waste) are decomposed by microorganisms under a controlled environment to create a soil-like material called compost. In co-composting, biosolids are combined with bulking agents to produce compost. The controlled aerobic degradation or decomposition of nitrogen rich organic wastes (biosolids) with carbon rich materials (biomass "bulking agents") produces compost.

Co-composting is a three-stage process that begins as soon as the materials are combined. The initial stage is referred to as active composting followed by curing, then finishing (processing and/or storage of compost). During the composting process microorganisms such as consume oxygen while metabolizing organic material such as green/wood waste, food waste, livestock manure and biosolids. The microbial activity results in the transformation of the initial mixture into a stable, pathogen-free composted material.

Active and Curing Compost Areas

Currently (pre-project), active area composting is performed in one location at the site, and then the material transferred to the curing phase area. In the proposed positive ASP configuration, the material will no longer be transferred from one location to the other. It will remain in the same pile during the entire composting life cycle (active and curing phase composting) before being screened and stored in the finish compost piles (ready for load out as finished product).

SK is proposing to convert the composting operation from negative to positive ASPs. The negative ASP operation pulled air through the compost piles using an engineered aeration grid designed to ensure an even flow of air through the piles. The use of ASPs provides the ability to control the temperature and oxygen levels in the piles and thereby minimize VOC and odorous emissions.

As stated above, active area composting was performed in one location at the site, and then transferred to the curing phase area. In the proposed positive ASP configuration, the material will no longer be transferred from one location to the other; it will remain in the same pile during the entire composting life cycle (active and curing phase composting) before being screened and stored in the finish compost piles (ready for load out as finished product).

The proposed positively aerated ASP composting areas will consist of an asphaltic concrete pad perforated with holes approximately every three to five feet with underground piping connected to blowers which will allow air to be delivered up through the piles. The area previously referred to as the "primary ASP area" includes ten ASPs within two ASP zones. The nominal height is approximately fifteen feet, with an overall footprint of 15,000 ft², for a total of up to 180,943 ft² ASP surface area. The area previously referred to as "curing phase compost ASP area" also has ten ASPs within two zones. The nominal height of the piles is also approximately fifteen feet, with an overall footprint of 14,520 ft². The piles have an

approximately six to twelve inch underlying base of coarse amendment (air plenum layer) to keep the composting material from plugging the air flow.

Once the piles have been formed, they will not be moved until the composting life cycle is complete (i.e. pathogen and vector attraction reduction time/temperature is reached). Air will be supplied to the pile using blowers and the underground piping system. Air circulation provides the aerobic conditions required for the compost process and minimizes odors associated with anaerobic conditions. The process is under positive pressure, where off-gas and air will be pushed up through the piles and controlled using a finished-compost biofilter layer placed on top of the compost pile. The biofilter layer controls odor and emissions (VOC and NH3). Temperature control is achieved by measurements or a feedback control system that varies the blower operation. Sprinklers on top of the compost piles are used to ensure the biofilter layer does not dry out. SK proposes periodic temperature monitoring of the biofilter layer as a surrogate parameter to establish proposed biofilter operation.

Positive Aeration

As previously mentioned in section I, positive aeration testing was performed as part of a SJVAPCD Technical Assistance Program Proposal (TAP 14-1). The results from that testing, showed that positive aeration using a 24" biofilter layer was able to achieve at least 80% control of VOC and NH3 emissions (BACT requirement listed on the current permit). Additionally, by using positive aeration, the proposed process is expected to have 100% capture efficiency (negative aeration system did not have 100% capture efficiency). The proposed control technique satisfies both BACT requirements and District Rule 4565 – Biosolids, Animal Manure, and Poultry Litter Operations requirements

V. Equipment Listing

Pre-Project Equipment Description (see PTOs in Appendix A):

- S-4212-1-3: BIOSOLIDS AND AMENDMENTS RECEIVING/MIXING OPERATION, INCLUDING AMENDMENT STORAGE AREA, FEED HOPPER WITH WATER SPRAY MISTERS, CONVEYOR DISCHARGING TO AMENDMENT PILES IN MIXING BUILDING, BIOSOLIDS UNLOADING INTO MIXING BUILDING, WITH MIXING BUILDING AND COVERED FEEDSTOCK CONVEYOR VENTED TO MIXING BUILDING BIOFILTER
- S-4212-2-3: BIOSOLIDS CO-COMPOSTING OPERATION INCLUDING TWO NEGATIVELY AERATED STATIC PILE (ASP) ACTIVE COMPOST AREAS, EACH VENTED TO IT'S OWN BIOFILTER (APPROXIMATELY 19,962 SQ FT EACH), AND TWO ASP CURING COMPOST AREAS, EACH VENTED TO IT'S OWN BIOFILTER (APPROXIMATELY 11,234 SQ FT EACH); INCLUDING BLOWER FANS, COOLING FANS, HUMIDIFIERS AND BIOFILTER SURFACE SPRINKLER SYSTEM

Proposed Modification:

- S-4212-1-7: MODIFICATION OF BIOSOLIDS AND AMENDMENTS RECEIVING/MIXING OPERATION, INCLUDING AMENDMENT STORAGE AREA, FEED HOPPER WITH WATER SPRAY MISTERS, CONVEYOR DISCHARGING TO

AMENDMENT PILES IN MIXING BUILDING, BIOSOLIDS UNLOADING INTO MIXING BUILDING, WITH MIXING BUILDING AND COVERED FEEDSTOCK CONVEYOR VENTED TO MIXING BUILDING BIOFILTER: **DELETE SLC**

S-4212-2-6: MODIFICATION OF BIOSOLIDS CO-COMPOSTING OPERATION INCLUDING TWO NEGATIVELY AERATED STATIC PILE (ASP) ACTIVE COMPOST AREAS, EACH VENTED TO IT'S OWN BIOFILTER (APPROXIMATELY 19,962 SQ FT EACH), AND TWO ASP CURING COMPOST AREAS, EACH VENTED TO IT'S OWN BIOFILTER (APPROXIMATELY 11,234 SQ FT EACH); INCLUDING BLOWER FANS, COOLING FANS, HUMIDIFIERS AND BIOFILTER SURFACE SPRINKLER SYSTEM: **CONVERT TO POSITIVE ASP COMPOST OPERATION WITH FINISHED COMPOST BIOFILTER COVER AND DELETE SLC AND REMOVE "ACTIVE" AND "CURING" DESIGNATIONS FOR ASP'S**

Post Project Equipment Description:

S-4212-1-7: BIOSOLIDS AND AMENDMENTS RECEIVING/MIXING OPERATION, INCLUDING AMENDMENT STORAGE AREA, FEED HOPPER WITH WATER SPRAY MISTERS, CONVEYOR DISCHARGING TO AMENDMENT PILES IN MIXING BUILDING, BIOSOLIDS UNLOADING INTO MIXING BUILDING, WITH MIXING BUILDING AND COVERED FEEDSTOCK CONVEYOR VENTED TO MIXING BUILDING BIOFILTER

S-4212-2-6: BIOSOLIDS CO-COMPOSTING OPERATION INCLUDING TWENTY POSITIVELY AERATED STATTC P|LE (ASP) COMPOSTING ZONES, EACH WITH A MAINTAINED FINISHED COMPOST BIOFILTER LAYER CAP; INCLUDING BLOWER FANS AND SURFACE SPRINKLER SYSTEM

VI. Emission Control Technology Evaluation

The co-composting operation produces volatile organic compound emissions (VOCs), ammonia (NH₃) and particulate matter (PM₁₀) emissions. Also, there is the potential for odorous emissions.

The use of the proposed positive ASP technology will result in equivalent VOC, NH₃ and odor emissions than previously permitted negative aeration ASPs.

SK is proposing to convert the composting operation (Permit 3-4212-2) from negative ASPs (vented to four biofilters) to positive ASPs (using finished compost as a biofilter layer) The positive ASP technology is expected to result in:

1. Better overall VOC capture.
2. Better biofilter reliability - the biofilter will have less time to degrade over the 45 day life cycle, in comparison with degradation of the negative ASP biofilters (over 2 years they experience settling, compaction, channeling, and vegetation problems).
3. Reduction of diesel combustion emissions (NO_x, PM, VOC, GHG and associated carcinogens) from non-permitted equipment - as materials transfer will no longer be required during composting process, and

4. Reduction of electricity usage (and associated GHG from associated power) – fan motors required for positive aeration are 50% smaller than negative ASP fan motors,

Positive Aeration

As previously mentioned in section I, Positive Aeration Testing was performed as part of a SJVAPCD Technical Assistance Program Proposal (TAP 14-1). The results from that testing showed that positive aeration using a 24" layer biofilter, was able to exceed the BACT requirement listed on the current permit (at least 80% VOC and NH₃ control).

Additionally, by using positive aeration, the proposed process will have 100% capture of emissions off the pile. (Under negative aeration, not all VOCs were captured off the ASP piles). The proposed control technique satisfies both New Source Review (NSR) Best Available Control Technology (BACT) requirements and District Rule 4565 - "Biosolids. Animal Manure. Poultry Litter Operation" requirements. The proposed method is more effective for controlling VOC and NH₃ emissions, and more economical to install and operate.

In the original approval the District established that properly designed biofilters operate with airflows not exceeding 4 cfm/ft². Since the biofilters will be removed this requirement will not be applicable. The positive aeration system will use variable speed drive fans which will supply air to the composting pile on an as needed basis depending on operation parameters such as pile temperature, moisture content, etc. Note that the fans will operate intermittently rather than continuously.

VII. General Calculations

A. Assumptions

- The facility is designed to operate 24 hours/day, 365 days/yr.
- The composting operation (S-4212-2) emits VOC and NH₃ only.
- S-4212-1's throughput limit will not change as a result of this proposal. Daily throughput = 6,466 TPD and annual = 670,000 TPY
- S-4212-2's throughput limit will not change as a result of this proposal. Daily throughput = 6,466 TPD and annual 670,000 TPY (wet tons as mixed and placed in compost piles).
- Composting will result in VOC and NH₃ emissions and potential odors.
- VOC, NH₃ and odors, will be minimized using a finished compost biofilter layer placed on the compost piles.
- 100% capture of emissions - as positive aeration results in all air flow exhausting through the biofilter layer.
- 80% control efficiency for VOC and NH₃ across the biofilter layer using up to 24 inch finished compost biofilter layer.
- Pre and post project emissions from ASPs and their biofilters will not change.
- PM₁₀ emissions during composting (S-4212-2) were assumed to be negligible in the previous approval due to high moisture content of materials handled. The moisture content of the mixture at the active compost phase is 50-65% initially. The processes downstream of the active phase (curing piles, finished product piles etc.) are also relatively high moisture content. The finished product is 30-45% moisture content.
- As shown below in section VIII, converting the SLC plan, currently including S-4212-1 and '2, to individual emission limits for each of the permits is not an NSR modification.

B. Emission Factors

S-4212-1 Mixing Building Biofilter (lb/ton of throughput)	
VOC out	Source
0.00114	S1074218

S-4212-2 VOC and NH3 Emission Factors (lb/ton of throughput)			
	VOC	NH₃	Source
All ASP surfaces with their biofilter caps serving ASPs	0.23826	0.2203	PTO

C. Calculations

1. Pre-Project Potential to Emit (PE1)

PE1, S-4212-1 Mixing Building Biofilter			
Daily Emissions			
	Throughput (tpd)	EF (lb/ton)	lb/day
VOC	6,466	0.00114	7.4

PE1, S-4212-1 Mixing Building Biofilter			
Annual Emissions			
	Throughput (tpy)	EF (lb/ton)	lb/yr
VOC	670,000	0.00114	764

PE1, Unit S-4212-2-3 (ASP composting)				
Daily Emissions				
		Throughput (tpd)	EF (lb/ton)	lb/day
All ASP surfaces and biofilters serving ASPs	VOC	6,466	0.23826	1,450.6
	NH₃	6,466	0.2203	1,424.5

PE1, Unit S-4212-2-3 (ASP composting)				
Annual Emissions				
		Throughput (tpy)	EF (lb/ton)	lb/yr
All ASP surfaces and biofilters serving ASPs	VOC	670,000	0.23826	159,634.2
	NH₃	670,000	0.2203	147,601.0

2. Post Project Potential to Emit (PE2)

PE2, S-4212-1 Mixing Building Biofilter			
Daily Emissions			
	Throughput (tpd)	EF (lb/ton)	lb/day
VOC	6,466	0.00114	7.4

PE2, S-4212-1 Mixing Building Biofilter			
Annual Emissions			
	Throughput (tpy)	EF (lb/ton)	lb/yr
VOC	670,000	0.00114	764

PE2, Unit S-4212-2-6 (ASP composting)				
Daily Emissions				
		Throughput (tpd)	EF (lb/ton)	lb/day
VOC emissions from the biofilter caps serving the co-composting zones	VOC	6,466	0.23826	1540.6
	NH₃	6,466	0.2203	1,424.5

PE2, Unit S-4212-2-1 (ASP composting)				
Annual Emissions				
		Throughput (tpy)	EF (lb/ton)	lb/year
VOC emissions from the Biofilter caps serving the co-composting zones	VOC	670,000	0.23826	159,634
	NH₃	670,000	0.2203	147,601

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.

Pre-Project Stationary Source Potential to Emit (SSPE1) lb/yr						
Permit	NOx	SOx	PM ₁₀	CO	VOC	NH3
S-4212-1-5	0	0	97	0	160,398	40
S-4212-2-5	0	0	0	0		147,554
S-4212-4-0	1,897	52	27	133	47	0
SSPE1	1,897	52	124	133	160,445	147,594

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.

Post-Project Stationary Source Potential to Emit (SSPE2) lb/yr						
Permit	NOx	SOx	PM ₁₀	CO	VOC	NH3
S-4212-1-5	0	0	97	0	764	40
S-4212-2-5	0	0	0	0	159,634	147,554
S-4212-4-0	1,897	52	27	133	47	0
SSPE2	1,897	52	124	133	160,445	147,594

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

Rule 2201 Major Source Determination (lb/year)						
	NO _x	SO _x	PM ₁₀	PM _{2.5}	CO	VOC
SSPE1	1,897	52	124	124	133	160,445
SSPE2	1,897	52	124	124	133	160,445
Major Source Threshold	20,000	140,000	140,000	200,000	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	1.0	80.2	0	0.2	0.1	0.1
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.

Offsets have previously been fully provided for this permit unit. Therefore, pursuant to District Rule 2201, this permitted unit is considered a Fully Offset Emissions Unit.

Therefore Baseline Emissions BE=PE1.

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 a major source for VOC, the project's PE2 is compared to the SB 288 Major Modification Thresholds in the following table in order to determine if the SB 288 Major Modification calculation is required.

SB 288 Major Modification Thresholds			
Pollutant	Project PE2 (lb/year)	Threshold (lb/year)	SB 288 Major Modification Calculation Required?
NO _x	0	50,000	N
SO _x	0	80,000	N
PM ₁₀	0	30,000	N
VOC	160,445	50,000	Y

Since the project's PE2 surpasses the SB 288 Major Modification Thresholds for VOC, the Net Emissions Increase (NEI) will be compared to the SB 288 Major Modification thresholds in order to determine if this project constitutes an SB 288 Major Modification.

The NEI is the total of emission increases for every permit unit addressed in this project and is calculated as follows:

$$NEI = PE2 - BAE$$

Where: PE2 = the sum of all the PE2s for each permit unit in this project
BAE = for units that are fully offset, the BAE = the PE1 for every unit, otherwise, the BAE is the actual annual emissions averaged over the baseline period for every unit.

The unit is fully offset; therefore, the BAE = PE1 in the NEI calculation.

SB 288 Major Modification Calculation and Determination					
Pollutant	PE2 (lb/yr)	PE1 (lb/yr)	NEI (lb/yr)	Thresholds (lb/yr)	SB 288 Major Modification?
NO _x	0	0	0	50,000	N
SO _x	0	0	0	80,000	N
PM ₁₀	0	0	0	30,000	N
VOC	160,445	160,445	0	50,000	N

As demonstrated in the preceding table, 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.

The determination of Federal Major Modification is based on a two-step test. For the first step, only the emission *increases* are counted. Emission decreases may not cancel out the increases for this determination.

Step 1

For existing emissions units, the increase in emissions is calculated as follows.

$$\text{Emission Increase} = \text{PAE} - \text{BAE} - \text{UBC}$$

Where: PAE = Projected Actual Emissions, and
BAE = Baseline Actual Emissions
UBC = Unused baseline capacity

Since this project does not result in an increase in design capacity or potential to emit, and it does not impact the ability of the emission unit to operate at a higher utilization rate, the UBC is the portion of PAE that the emission units could have accommodated during the baseline period.

Therefore, the BAE + UBC is equal to the PE1. Assuming the PAE equals PE2 the emission increase equals PE2 – PE1.

As PE1 equals PE2, the emission increase = 0 lb/yr

The project's combined total emission increases is compared to the Federal Major Modification Thresholds in the following table.

Federal Major Modification Thresholds for Emission Increases			
Pollutant	Total Emissions Increases (lb/yr)	Thresholds (lb/yr)	Federal Major Modification?
NO _x	0	0	N
VOC	0	0	N
PM ₁₀	0	30,000	N
PM _{2.5}	0	20,000	N
SO _x	0	80,000	N

Since none of the Federal Major Modification Thresholds are being surpassed with this project, this project does not constitute a Federal Major Modification and no further analysis is required.

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)

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	80.2	0	0	0	0
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.

VIII. Compliance

Rule 2201 New and Modified Stationary Source Review Rule

This rule shall apply to all new stationary sources and all modifications to existing stationary sources which are subject to the District permit requirements and after construction emit or may emit one or more affected pollutant.

Pursuant to section 3.25.1 a “modification” is an action including at least one of the following items:

- Any change in hours of operation, production rate, or method of operation of an existing emissions unit, which would necessitate a change in permit conditions.
- Any structural change or addition to an existing emissions unit which would necessitate a change in permit conditions. Routine replacement shall not be considered to be a structural change.

- An increase in emissions from an emissions unit caused by a modification of the Stationary Source when the emissions unit is not subject to a daily emissions limitation.
- Addition of any new emissions unit which is subject to District permitting requirements.
- A change in a permit term or condition proposed by an applicant to obtain an exemption from an applicable

Removing S-4212-1 from the SLC plan is not a “modification” and the facility is not new; therefore, the revision proposed for S-4212-1 is not subject to this 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

$$\text{AIPE} = \text{PE2} - \text{HAPE}$$

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)

$$\text{HAPE} = \text{PE1} \times (\text{EF2}/\text{EF1})$$

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

$$AIPE = PE2 - (PE1 * (EF2 / EF1))$$

Since EF1 = EF2 the AIPE = PE2 - PE1

Since PE2 equals PE1 the AIPE = 0.0 lb/day

As demonstrated above, the AIPE is not greater than 2.0 lb/day. 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 or Federal Major Modification. 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	1,897	52	124	133	160,445
Offset Thresholds	20,000	54,750	29,200	200,000	20,000
Offsets triggered?	No	No	No	No	Yes

2. Quantity of Offsets Required

As seen above, the facility is an existing Major Source for VOC and the SSPE2 is greater than the offset thresholds. Therefore offset calculations will be required for this project.

The quantity of offsets in pounds per year for VOC is calculated as follows for sources with an SSPE1 greater than the offset threshold levels before implementing the project being evaluated.

Offsets Required (lb/year) = $(\Sigma[PE2 - BE] + ICCE) \times DOR$, for all new or modified emissions units in the project,

Where,

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

BE = Baseline Emissions, (lb/year)

ICCE = Increase in Cargo Carrier Emissions, (lb/year)

DOR = Distance Offset Ratio, determined pursuant to Section 4.8

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 = HAE

As calculated in Section VII.C.6 above, the BE from this unit are equal to the PE1 since the unit is Fully Offset.

Also, there is only one emissions unit associated with this project and there are no increases in cargo carrier emissions. Therefore offsets can be determined as follows:

Offsets Required (lb/year) = $([PE2 - BE] + ICCE) \times DOR$

PE2 (VOC) = 160,445 lb/year

BE (VOC) = 160,445 lb/year

ICCE = 0 lb/year

Offsets Required (lb/year) = $([160,445 - 160,445] + 0) \times DOR$
= 0 lb VOC/year

As demonstrated in the calculation above, the amount of offsets is zero. Therefore, 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	1897	1897	20,000 lb/year	No
SO _x	52	52	54,750 lb/year	No
PM ₁₀	124	124	29,200 lb/year	No
CO	133	133	200,000 lb/year	No
VOC	160,445	160,445	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	SSPE1 (lb/year)	SSPE2 (lb/year)	SSIPE (lb/year)	SSIPE Public Notice Threshold	Public Notice Required?
NO _x	1897	1897	0	20,000 lb/year	No
SO _x	52	52	0	20,000 lb/year	No
PM ₁₀	124	124	0	20,000 lb/year	No
CO	133	133	0	20,000 lb/year	No
VOC	160,445	160,445	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.

e. Title V Significant Permit Modification

As shown in the Discussion of Rule 2520 below, this project does not constitute a Title V significant modification. Therefore, public noticing for Title V significant modifications is required for this project.

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.

Proposed Rule 2201 (DEL) Conditions:

S-4212-2-6:

- Maximum quantity of feedstock (mixed biosolids and amendments) introduced into co-compost +ASPs shall not exceed 6,466 tons/day nor 670,000 tons/year (based on a rolling 12 months). [District Rules 2201 and 4565]
- VOC emissions from this permit unit (includes all +ASP surfaces with their biofilter caps) shall not exceed 0.23826 b/ton throughput. Throughput is defined as wet ton, as mixed, feedstock introduced into compost ASPs. [District Rules 2201 and 4565]
- VOC emissions from the biofilter caps serving the co-composting zones shall not exceed 1,540.6 lb/day or 159,634 lb/year. [District Rules 2201 and 4565]
- NH3 emissions from the +ASPs shall not exceed 0.2203lb/ton throughput. Throughput is defined as wet ton, as mixed, feedstock introduced into compost +ASPs. [District Rules 2201 and 4565] N
- NH3 emissions from the biofilter caps serving the co-composting zones shall not exceed 1424.5 lb/day. [District Rules 2201 and 4565] N

E. Compliance Assurance

1. Source Testing

Demonstration of compliance with biofilter cap VOC daily emissions limit (DEL) and control efficiency shall be performed during the third composting cycle after conversion to the +ASP system (120 to 180 days after implementation of this ATC) and not less than once every two years thereafter. [District Rules 2201 and 4565] N

2. Monitoring

- Every +ASP biofilter cap temperature and moisture shall be monitored monthly by sampling at least one location on each +ASP. Samples shall be taken at two depths beneath the surface. Samples shall be analyzed at in-house laboratory within 48 hours of collection. After collection of biofilter media samples, any sample holes shall be re-drilled immediately with the excavated material. [District Rules 2201 and 4565]
- Biofilter caps shall be checked visually at least weekly for compaction, moisture level, channeling (cracks), or noticeable increase in detectable odors. [District Rules 2201 and 4565] N
- Biofilter cap media temperature shall be monitored weekly with automatic or manual temperature probe(s) inserted into a minimum of four representative test points along an approximate diagonal transect line for each ASP zone. If manual probes are utilized the probe shall remain in place for 30 to 90 seconds to allow the temperature reading to stabilize before recording the temperature. [District Rules 2201 and 4565] N
- If any +ASP/biofilter cap media temperature reading is out of range, then the biofilter cap moisture shall be tested, and recorded, for the corresponding zone(s). [District Rules 2201 and 4565] N
- If any biofilter cap monitoring parameter is out of range, the applicant shall perform the necessary maintenance to return the media parameter(s) to the permitted range within one week of detecting the problem. All grids which tested out of range shall be re-tested within one week. If any grid is still out of range additional biofilter media shall be added within ten days until the monitoring parameters are documented to be within appropriate operational ranges. [District Rules 2201 and 4565] N

3. Recordkeeping

Recordkeeping is required to demonstrate compliance with the offset, public notification and daily emission limit requirements of Rule 2201. The following condition(s) are listed on the permit to operate:

- Records shall be kept that demonstrate that the facility meets the Rule 4565 class one mitigation measures selected each day that a mitigation measure is performed. [District Rules 2201 and 4565] N

- Operator shall maintain an inspection logbook which contains the quarterly VOC hydrocarbon analyzer readings in ppmv for each inspection location (on surface of the +ASP/biofilter cap), along with the date of the inspection. [District Rules 2201 and 4565] N
- Records shall be kept of wet tons per day of biosolids fed into the feedstock mixing operation, daily amendment mix ratio, monthly biofilter temperature, moisture readings, weekly biofilter cap temperature and blower inlet pressure readings, associated biofilter cap zone locations, and annual VOC emissions on a 12 month rolling average. Records shall be kept of visual inspections and actions taken to correct compaction (and/or high +ASP/biofilter cap blower fan pressure(s)), channeling, excessive vegetative growth or a noticeable increase in odors, including date of inspection and date actions were taken to correct problem(s). Records shall be kept of dates and hours each +ASP fan is taken out of service for maintenance and/or repair. [District Rules 2201 and 4565] N
- All records shall be retained on-site for a period of at least five years and made readily available for District inspection upon request. [District Rules 2201 and 4565]
- The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR Part 64.9. [40 CFR Part 64.9] N

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 composting 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. However, no subparts of 40 CFR Part 61 or 40 CFR Part 63 apply to composting operations.

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). As the materials handled have a high moisture, visible emissions are not expected to exceed Ringelmann 1 or 20% opacity. Also, based on past inspections of the facility 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

Section 3.1 prohibits discharge of dust, fumes, or total particulate matter into the atmosphere from any single source operation in excess of 0.1 grain per dry standard cubic foot.

The equipment is currently in compliance with the requirements of this rule and the proposed modification is not expected to affect compliance. Continued compliance is expected.

Rule 4565 Biosolids, Animal Manure and Poultry Litter Operations (3/15/2007)

SK operates a co-composting facility that is subject to the requirements of Section 5.3.3, 5.4, 5.5, and 5.7 of the rule.

Section 5.3 states that operators of composting/co-composting facilities with throughputs at least 100,000 wet tons per year shall meet either 5.3.3.1 or 5.3.3.2.

Section 5.3.3.1 requires the operator to implement at least four (4) Class One mitigation measures in addition to one (1) Class Two mitigation measure for active composting.

Section 5.3.3.2 requires the operator to implement at least two (2) Class One mitigation measures, in addition to one (1) Class Two mitigation measure for active composting and one (1) Class Two mitigation measure for curing composting.

Table 2 – Composting/Co-composting Facility Mitigation Measures	
<i>Class One Mitigation Measures</i>	
1.	Scrape or sweep, at least once a day, all areas where compostable material is mixed, screened, or stored such that no compostable material greater than one inch (1") in height is visible in the areas scraped or swept immediately after scraping or sweeping, except for compostable material in process piles or storage piles.
2.	Maintain a minimum oxygen concentration of at least five percent (5%), by volume, in the free air space of every active and curing compost pile.
3.	Maintain the moisture content of every active and curing compost pile between 40% and 70%, by weight.
4.	Manage every active pile such that the initial carbon to nitrogen ratio of every pile is at least twenty (20) to one (1).
5.	Cover all active compost piles within 3 hours of each turning with one of the following: a waterproof covering; at least six (6) inches of finished compost; or at least six (6) inches of soil.
6.	Cover all curing compost piles within 3 hours of each turning with one of the following: a waterproof covering; at least six (6) inches of finished compost; or at least six (6) inches of soil.
7.	Implement an alternative Class One mitigation measure(s) not listed above that demonstrates at least a 10% reduction, by weight, in VOC emissions.
<i>Class Two Mitigation Measures</i>	
8.	Conduct all active composting in aerated static pile(s) vented to a VOC emission control device with a VOC control efficiency of at least 80% by weight.
9.	Conduct all active composting in an in-vessel composting system vented to a VOC emission control device with a VOC control efficiency of at least 80% by weight.
10.	Conduct all curing composting in aerated static pile(s) vented to a VOC emission control device with a VOC control efficiency of at least 80% by weight.
11.	Conduct all curing composting in an in-vessel composting system vented to a VOC emission control device with a VOC control efficiency of at least 80% by weight.
12.	Implement an alternative Class Two mitigation measure(s) not listed above that demonstrates at least 80% reduction, by weight, in VOC emissions.

SK will implement items 1, 3, 8 and 10 of the options listed in Section 5.3 Table 2; therefore the facility is in compliance with the requirements of this section.

Section 5.4 establishes the following standards for VOCs from Aerated Static Piles and In-Vessel Systems.

Section 5.4.1 states that in addition to the requirements of Section 5.3, an aerated static pile shall have no measurable increase (< 0.45 ppmv increase) over background levels of hydrocarbons within three feet of any surface of the aerated static pile.

Monitoring of the facility will be used to demonstrate that VOC emissions are not detectable above the surface of the ASPs; compliance with this requirement is expected.

Section 5.4.2 states that in addition to the requirements of Section 5.3, an in-vessel composting operation shall have no measurable increase (< 0.45 ppmv increase) over background levels of hydrocarbons outside the in-vessel enclosure, including any opening that occurs briefly for access or maintenance. This section does not apply to the SK facility

Section 5.4.3 states "An operator shall test for VOCs once each calendar quarter."

SK maintains a log of quarterly VOC monitoring data

Section 5.4.3.1 specifies that the location and number of test points for aerated static pile composting system shall be determined using TMECC 02.01-B (Selection of Sampling Locations for Windrows and Piles)

SK conducts sampling at the locations determined using TMECC 02.01-B methodology; however, this method is strictly for use in pulling compost material samples. Based on a portion of the methodology, SK will take VOC data from the ASP's at 50 foot intervals, thereby monitoring two (2) locations per each ASP batch, which will result in 40 locations.

Section 5.4.3.2 specifies "The openings of an in-vessel composting system shall be tested according to the test method specified in Section 6.2.3.2." This section does not apply to the SK facility

Section 5.4.3.3 specifies that "The hydrocarbon analyzer shall meet the requirements specified in Section 6.2.4.2."

SK has an Eagle Analyzer from RKI Instruments. This analyzer is a (4) gas/VOC/Ammonia Detection Monitor. This monitor does not require Nitrogen nor flame, both of which are fire/safety hazards at a compost facility. SK previously requested, and received, approval by the APCO for this alternate analyzer.

Section 5.4.4 states "In lieu of complying with the applicable requirements of Sections 5.4.1 or 5.4.2, an operator may monitor one or more alternative parameters. The operator must demonstrate, to the satisfaction of the APCO and EPA that the alternative parameter(s) correlates to the composting system capturing as much of the VOC emissions as technologically practical."

SK is approved to take VOC monitoring data from the ASP's at 50 foot intervals, thereby monitoring two (2) locations per each ASP batch which will result in 40 locations in the ASP piles.

Section 5.4.5 states "In lieu of complying with the requirements of Section 5.4.3, an operator may use a different analyzer or test on a different schedule if the operator demonstrates, to the satisfaction of the APCO and EPA, that the alternate analyzer or alternate schedule is as indicative of system performance as the requirements Section 5.4.3."

SK has an Eagle Analyzer from RKI Instruments. This analyzer is a (4) gas/VOC/Ammonia Detection Monitor. This monitor does not require Nitrogen nor flame, both of which are fire safety hazards at a compost facility. SK was previously approved by the District to use this alternate analyzer.

Section 5.5.1 states "In addition to complying with the applicable requirements of Section 5.3, an operator using a biofilter as a VOC emission control device shall maintain all biofilters at their facility in such a manner that each biofilter complies with the following conditions at all times when it is in operation:

5.5.1.1 The biofilter media temperature is between 70 degrees Fahrenheit and 110 degrees Fahrenheit (permit was previously modified to say 90-115 deg F),

5.5.1.2 The moisture content of the biofilter media is between 40.0% and 70.0% by weight (permit was previously modified to say 45-80% humidity).

5.5.1.3 The pH of the biofilter media is between 6.5 and 8.0 (permit was previously modified to say 4.5-8.0).

5.5.1.4 Visual inspection - The biofilter media is free of observable rodent burrows, cracks, and channeling. Weed coverage shall be less than 10% of the exposed surface of the biofilter."

SK maintains a log of their monitoring data. Past District analysis has determined that pH is no indicator of biofilter life, but it will still be monitored to satisfy Rule 4565 requirements. The other parameters will continue to be monitored to ensure proper biofilter operation as well, on the biofilter layer covering the positive aerated static piles.

Section 5.5.2: Biofilter Monitoring Schedule

5.5.2.1 The biofilter media shall be tested for the following properties at least once per calendar month in five separate evenly spaced locations throughout the biofilter: temperature, moisture, and pH.

5.5.2.2 Visual inspection of biofilter media shall be performed at least once each week.

5.5.3 In lieu of complying with the requirements of Section 5.5.1, an operator may be held to a different range of values or monitor alternative parameter(s) if the operator demonstrates, to the satisfaction of the APCO and EPA, that the range of values or alternate parameter(s) is as indicative of system performance as the applicable requirements Section 5.5.1. The alternate range of the parameters listed in 5.5.1 or alternate monitoring parameter can be demonstrated by a source test."

SK maintains a log of preceding monitoring data

5.7.1 The VOC emission control device (biofilter or non-biofilter) shall be tested for VOC control efficiency within ninety days of installation and every two years thereafter. VOC emission control devices with an active Permit-to-Operate on March 15, 2007 shall be tested for VOC control efficiency on or before September 30, 2007, and every two years thereafter.

5.7.2 The source test must be conducted under representative operating conditions with respect to seasonal conditions, compost composition, process throughput, processing of materials, and pile geometries.

5.7.3 An operator of a biofilter may request a longer time between installation and source test if the operator shows, to the satisfaction of the APCO and EPA, that a longer time is necessary. In no case shall the time between installation and the source test be greater than six (6) months.

The applicant has proposed to test the biofilter within 120 to 180 days after implementation of this ATC and not less than once every two years thereafter.

6.1.1: Exempt Operations Records

The co-composting operations at SK are not exempt from Rule 4565; therefore this section of the rule does not apply to SKIC.

6.1.2 Landfill Records

SK does not landfill biosolids; therefore this section does not apply.

6.1.3 Land Application Records

SK does not land-apply biosolids; therefore this section does not apply.

6.1.4 Composting Facility Records

An operator of a composting facility subject to this rule shall keep the following records:

6.1.4.1 Throughput Records

On a daily basis, an operator shall record the quantity of materials received that would be used in the compost/co-compost operation. These materials include, but are not limited to, material that may be recovered from the composting process for reuse in another batch of compostable material; biosolids; animal manure; poultry litter; and green waste.

Records shall be kept of wet tons per day of biosolids fed into the feedstock mixing operation, daily amendment mix ratio, monthly biofilter temperature, moisture readings, weekly Biofilter cap temperature and blower inlet pressure readings, associated biofilter cap zone locations, and annual VOC emissions on a 12 month rolling average. Records shall be kept of visual inspections and actions taken to correct compaction (and/or high +ASP/biofilter cap blower fan pressure(s)), channeling, excessive vegetative growth or a noticeable increase in odors, including date of inspection and date actions were taken to correct problem(s). Records shall be kept of dates and hours each +ASP fan is taken out of service for maintenance and/or repair. [District Rules 2201 and 4565]

All records shall be retained on-site for a period of at least five years and made readily available for District inspection upon request. [District Rules 1070 and 4565 6.1.8]

6.1.5 Class One Mitigation Measure Records

An operator shall keep records that demonstrate that the facility meets the Class One mitigation measures selected for the facility each day that a mitigation measure is performed.

For operators using an approved alternative Class One mitigation measure, the operator shall keep records for the alternative mitigation measure each day the alternative mitigation measure is performed.

Records shall be kept that demonstrate that the facility meets the Rule 4565 class one mitigation measures selected each day that a mitigation measure is performed. [District Rule 4565 6.1.4.2]

6.1.4.3 Class Two Mitigation Measure Records

An operator shall keep records according to 6.1.5 through 6.1.7, as applicable, for the composting operations subject to Class Two mitigation measures. See following sections for compliance discussion.

6.1.5 VOC Inspection Records

The operator shall maintain an inspection logbook. The following information shall be contained in the logbook:

6.1.5.1 The date of the VOC inspection.

6.1.5.2 The reading of the portable hydrocarbon analyzer in ppmv for each inspection location.

6.1.5.3 If an alternate parameter is monitored, list the parameter monitored and record the level of the alternate parameter for each inspection location.

Operator shall maintain an inspection logbook which contains the quarterly VOC hydrocarbon analyzer readings in ppmv for each inspection location (on surface of the ASP), along with the date of the inspection. [District Rule 4565 6.1.5]

6.1.6 Biofilter Records

In addition to the records required in Section 6.1.4, an operator using a biofilter as a VOC emission control device shall keep records with the following information:

6.1.6.1 Date of biofilter monitoring.

6.1.6.2 The parameter monitored and the test results for the parameter monitored.

6.1.6.3 If an alternate parameter is monitored, list the parameter monitored and record the level of the alternate parameter for each location.

Records shall be kept of wet tons per day of biosolids fed into the feedstock mixing operation, daily amendment mix ratio, monthly biofilter temperature, moisture and pH readings, weekly biofilter media temperature and exhaust blower discharge pressure readings, associated biofilter grid locations, and annual VOC emissions on a 12 month rolling average. Records shall be kept of visual inspections and actions taken to correct compaction (and/or high biofilter blower fan pressure(s)), channeling, excessive vegetative growth or a noticeable increase in odors, including date of inspection and date actions

were taken to correct problem(s). Records shall be kept of dates and hours each biofilter fan is shutdown for maintenance and/or repair. [District Rules 1070 and 4565 6.1]

6.1.7 Non-Biofilter VOC Emission Control Device Records

SKIC uses biofilter control devices; therefore this section does not apply.

6.1.8 Records retention

Records are required to be kept on-site for a period of five years. The following recordkeeping condition will be listed ATC permit S-4212-2-5 to ensure compliance:

All records shall be retained on-site for a period of at least five years and made readily available for District inspection upon request. [District Rules 1070 and 4565 6.1.8]

6.2 Test Methods

The test methods identified in Rule 4565 have been listed on the permits. Compliance with section 6.2 is expected.

The following biofilter cap test methods shall be used: biofilter temperature - EPA method 170.1, moisture content -TMECC 03.09 (Total solids and moisture at 70+1 to 5 degrees centigrade), VOC leaks - EPA Method 21 (VOC leaks), and hydrocarbon analyzer for VOCs calibrated with certified zero and 10 ppmv methane standards. [District Rules 2201 and 4565] N

District witnessed source testing to determine surface VOC concentrations, flowrate, and destruction efficiency across selected +ASP biofilter caps shall be performed by an independent testing laboratory certified for SCAQMD test methods 25.3, and 201 .1 . [District Rules 2201 and 4565] N

Operator may use an alternate test method to those listed above for which written approval of the APCO has been obtained. [District Rules 1081 and 4565 6.2.6]
Compliance with Rule 4565 is expected.

California Health & Safety Code 42301.6 (School Notice)

The District has verified that this site is located within 1,000 feet of a school. However, pursuant to California Health and Safety Code 42301.6, since this project will not result in an increase in emissions, 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) are exempt from Best Available Control Technology (BACT) requirements. Furthermore, the District has determined that potential emission increases would have a less than significant health impact on sensitive receptors.

Issuance of permits for emissions units not subject to BACT requirements and with health impact less than significant 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.

IX. Recommendation

Compliance with all applicable rules and regulations is expected. Issue ATC S-4212-1-7 and '2-6 subject to the permit conditions on the attached draft ATCs in **Appendix B**.

X. Billing Information

Annual Permit Fees			
Permit Number	Fee Schedule	Fee Description	Annual Fee
S-4212-1-7	3020-01 F	400 bhp	\$607
S-4212-2-6	3020-01 F	400 to 800 bhp	\$607

Appendixes

- A: Current PTOs
- B: Draft ATC

Appendix A
Current PTOs

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-4212-1-3

EXPIRATION DATE: 02/29/2016

EQUIPMENT DESCRIPTION:

BIOSOLIDS AND AMENDMENTS RECEIVING/MIXING OPERATION, INCLUDING AMENDMENT STORAGE AREA, FEED HOPPER WITH WATER SPRAY MISTERS, CONVEYOR DISCHARGING TO AMENDMENT PILES IN MIXING BUILDING, BIOSOLIDS UNLOADING INTO MIXING BUILDING, WITH MIXING BUILDING AND COVERED FEEDSTOCK CONVEYOR VENTED TO MIXING BUILDING BIOFILTER

PERMIT UNIT REQUIREMENTS

1. Air pollution equipment (blower fans, ducting, biofilter, etc) shall be properly maintained in good operating condition at all times, except for times of maintenance and/or repair allowed by conditions below. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Each biofilter blower fan may be shut down for a total of 48 hours per 6-month time period for the purpose of maintenance and/or repair. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Feedstock mixing shall be performed in the mixing building, and mixing building shall be vented to biofilter. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Conveyors transferring feedstock from mixing building to feedstock pad shall be covered and ventilated to receiving building biofilter. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Biofilter shall be equipped with operational humidifier and sprinkler systems, and shall be used as needed to maintain optimum biofilter media moisture content. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Amendment feed hopper shall be equipped with operational mist type water spray, and used as needed to ensure visible emissions do not exceed 5% opacity for more than 3 minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
7. VOC destruction efficiency across the biofilter serving the mixing building shall not be less than 80%, or total VOC emission rate from mixing building shall not exceed 2 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. NH3 destruction efficiency across the biofilter serving the mixing building shall not be less than 80%, or total NH3 emission rate from mixing building shall not exceed 2 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. There shall be no visible emissions greater than 5% opacity for more than three minutes in any one hour, from receiving/mixing operation amendment truck unloading, feed hopper loading, outdoor conveyor transfer points, or feed stock stacking conveyor. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Maximum quantity of biosolids introduced into the feedstock mixers shall not exceed 350,000 wet tons on a rolling 12-month basis. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Maximum quantity of amendment introduced into the feedstock mixing operation shall not exceed 320,000 wet tons on a rolling 12-month basis. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Maximum quantity of feedstock discharged from the mixing operation shall not exceed 6,466 wet tons per day. [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. Emissions from amendment feed hopper shall not exceed 0.0001 lb-PM10/ton. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Emissions from amendment conveyor transfer points shall not exceed 4.5E-5 lb-PM10/ton. [District Rule 2201] Federally Enforceable Through Title V Permit
15. VOC emissions from the biofilter serving the mixing building shall not exceed 7.4 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Combined VOC emissions from S-4212-1, '-2 and '-7 shall not exceed 160,398 lb/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
17. NH3 emissions from the biofilter shall not exceed 0.4 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Biofilter media shall be maintained such that the pH remains between 5.0 and 8.0, moisture content between 40 and 80% and temperature between 50 and 95 degrees F, as measured at a depth of at least 2 feet below the media surface. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Biofilter discharge surface, for testing and monitoring purposes, shall be divided into sixteen uniformly sized areas (grids). When source testing the biofilter, a minimum of 8 representative grid points shall be used. [District Rule 1070] Federally Enforceable Through Title V Permit
20. Biofilter exhaust blower discharge pressure shall not exceed 5.0 psig. [District Rule 2201] Federally Enforceable Through Title V Permit
21. Biofilter exhaust blower discharge pressure shall be monitored weekly to ensure system pressure is within permitted operating range. [District Rule 1081] Federally Enforceable Through Title V Permit
22. Biofilter moisture, pH and temperature shall be monitored monthly by sampling one central grid location. Samples shall be taken at two depths beneath the surface. Samples shall be analyzed at in-house laboratory within 48 hours of collection. After collection of biofilter media samples, any sample holes shall be re-filled immediately with the excavated material. [District Rule 1081] Federally Enforceable Through Title V Permit
23. Biofilter media shall be "fluffed" or replaced as needed to maintain the exhaust blower discharge pressure within the normal operating range. [District Rule 2201] Federally Enforceable Through Title V Permit
24. Vegetative growth shall not exceed 10% of the total biofilter surface. [District Rule 2201] Federally Enforceable Through Title V Permit
25. Biofilter shall be checked visually at least weekly for compaction, channeling (cracks), vegetative growth or noticeable increase in detectable odors. [District Rule 2201] Federally Enforceable Through Title V Permit
26. Biofilter media temperature shall be monitored weekly by inserting a manual temperature probe into each biofilter grid location, waiting approximately 30 to 90 seconds for the temperature to stabilize, then recording the temperature. [District Rule 1081] Federally Enforceable Through Title V Permit
27. If any biofilter media temperature reading is out of range, then the biofilter moisture and pH shall be tested, and recorded, for the corresponding grid(s). [District Rule 1081] Federally Enforceable Through Title V Permit
28. If any biofilter monitoring parameter is out of range, the applicant shall perform the necessary maintenance to return the media parameter(s) to the permitted range within 1 week of detecting the problem. All grids which tested out of range shall be re-tested within one week. [District Rule 2201] Federally Enforceable Through Title V Permit
29. Demonstration of compliance with biofilter VOC daily emissions limit (DEL) and control efficiency shall be made within 60 days of replacement of spent media which requires more than 50% of the biofilter media to be replaced. If any ASP biofilters are replacing media concurrent with the replacement of the mixing building biofilter media, then the ASP biofilter source testing may be used as representative testing in demonstrating compliance with VOC control efficiency requirement for the mixing building biofilter. [District Rules 1070 and 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.

30. District witnessed source testing of biofilter performed to measure VOC and NH₃ inlet concentrations, inlet flowrate, and VOC and NH₃ destruction efficiencies across the biofilter, shall be performed by an independent testing laboratory certified for SCAQMD methods 25.3, 207.1, 1.1, 1.2, 2.1, 2.2, 2.3, 3.1 and 4.1. [District Rule 1070] Federally Enforceable Through Title V Permit
31. The following biofilter test methods shall be used: Biofilter temperature - EPA method 170.1, moisture content - TMECC 03.09 (Total solids and moisture at 70+/-5 degrees centigrade), media pH - TMECC 04.11-A (1:5 slurry pH), VOC leaks - EPA Method 21 (VOC leaks), and hydrocarbon analyzer for VOCs calibrated with certified zero and 10 ppmv methane standards. [District Rule 1081] Federally Enforceable Through Title V Permit
32. Operator may use an alternate test method to those listed above for which written approval of the APCO has been obtained. [District Rule 1081] Federally Enforceable Through Title V Permit
33. District shall be notified at least 30 days prior to any compliance source testing, and a source test plan shall be submitted for approval at least 15 days prior to testing. Official test results and field test data from compliance testing shall be submitted within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
34. The following operating parameters shall be documented during times of testing: biofilter exhaust blower discharge pressure and temperature, biofilter air flow, biofilter media temperature (all 16 grids), moisture content and pH (Only two samples of moisture and pH required, samples to be taken at one central location (from at least two feet deep)). Moisture and pH shall also be sampled, and recorded, for every grid in which the temperature is found to be out of the permitted range. [District Rule 1070] Federally Enforceable Through Title V Permit
35. VOC and NH₃ samples shall be analyzed by a lab certified by SCAQMD to perform identified SCAQMD test methods. [District Rule 1081] Federally Enforceable Through Title V Permit
36. Records shall be kept of wet tons per day of biosolids fed into the feedstock mixing operation, daily amendment mix ratio, monthly biofilter temperature, moisture and pH readings, weekly biofilter media temperature and exhaust blower discharge pressure readings, associated biofilter grid locations, and annual VOC emissions on a 12 month rolling average. Records shall be kept of visual inspections and actions taken to correct compaction (and/or high biofilter blower fan pressure(s)), channeling, excessive vegetative growth or a noticeable increase in odors, including date of inspection and date actions were taken to correct problem(s). Records shall be kept of dates and hours each biofilter fan is shutdown for maintenance and/or repair. Records shall be retained on-site for a period of at least five years and made readily available for District inspection upon request. [District Rule 1070] 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: S-4212-2-3

EXPIRATION DATE: 02/29/2016

EQUIPMENT DESCRIPTION:

BIOSOLIDS CO-COMPOSTING OPERATION INCLUDING TWO NEGATIVELY AERATED STATIC PILE (ASP) ACTIVE COMPOST AREAS, EACH VENTED TO IT'S OWN BIOFILTER (APPROXIMATELY 19,962 SQ FT EACH), AND TWO ASP CURING COMPOST AREAS, EACH VENTED TO IT'S OWN BIOFILTER (APPROXIMATELY 11,234 SQ FT EACH); INCLUDING BLOWER FANS, COOLING FANS, HUMIDIFIERS AND BIOFILTER SURFACE SPRINKLER SYSTEM

PERMIT UNIT REQUIREMENTS

1. Active and curing phase composting shall be performed in negatively-aerated static piles (ASPs) with engineered, under pile, grid aeration system venting to a biofilter. [District Rules 2201 and 4565] Federally Enforceable Through Title V Permit
2. ASP biofilters shall be equipped with operational humidifier and sprinkler systems, and shall be used, as needed, to maintain optimum biofilter media moisture content. [District Rules 2201 and 4565] Federally Enforceable Through Title V Permit
3. Air pollution equipment (blower fans, ducting, biofilters, etc) shall be properly maintained in good operating condition at all times, except for times of maintenance and/or repair allowed by conditions below. [District Rules 2201 and 4565] Federally Enforceable Through Title V Permit
4. Each biofilter blower fan may be shut down for a total of 48 hours per 6-month time period for the purpose of maintenance and/or repair. [District Rule 2201] Federally Enforceable Through Title V Permit
5. All active phase ASPs shall be covered with finished compost or wood chips. [District Rule 2201] Federally Enforceable Through Title V Permit
6. VOC destruction efficiency across each biofilter serving the active phase compost ASPs shall not be less than 80%, or total VOC emission rate shall not exceed 2 pounds in any one day. [District Rules 2201 and 4565] Federally Enforceable Through Title V Permit
7. NH3 destruction efficiency across each biofilter serving the active phase compost ASPs shall not be less than 80%, or total NH3 emission rate shall not exceed 2 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Maximum quantity of feedstock (mixed biosolids and amendments) introduced into active phase compost ASPs shall not exceed 6,466 tons/day nor 670,000 tons/year (based on a rolling 12 months). [District Rule 2201] Federally Enforceable Through Title V Permit
9. VOC emissions from this permit unit (includes all ASP surfaces and biofilters serving ASPs) shall not exceed 0.23826 lb/ton throughput. Throughput is defined as wet ton, as mixed, feedstock introduced into active phase compost ASPs. [District Rule 2201] Federally Enforceable Through Title V Permit
10. VOC emissions from the biofilters serving the active and curing phase composting shall not exceed 1,135.1 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Combined VOC emissions from S-4212-1, '-2 and '-7 shall not exceed 160,398 lb/yr. [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.

12. NH₃ emissions from this permit unit (includes all ASP surfaces and biofilters serving ASPs) shall not exceed 0.2203 lb/ton throughput. Throughput is defined as wet ton, as mixed, feedstock introduced into active phase compost ASPs. [District Rule 2201] Federally Enforceable Through Title V Permit
13. NH₃ emissions from the biofilters serving the active and curing phase composting shall not exceed 279.6 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Permittee shall implement at least two (2) Rule 4565 class one mitigation measures, in addition to one (1) class two mitigation measures for active composting and one (1) class two mitigation measure for curing composting. [District Rule 4565] Federally Enforceable Through Title V Permit
15. Biofilter media shall be maintained such that the pH remains between 4.5 and 8.0, moisture content between 45 and 80% and temperature between 90 and 115 degree F, as measured at a depth of at least 2 feet below the media surface. [District Rules 2201 and 4565; and 40 CFR 64.3] Federally Enforceable Through Title V Permit
16. Aerated Static Piles shall have no measurable increase (<0.45 ppmv increase) over background levels of hydrocarbons within three feet of any surface of any aerated static pile. Testing shall be performed once per quarter in accordance with the requirements of Rule 4565 section 5.4 using a District approved analyzer. [District Rule 4565 and 40 CFR 64.3] Federally Enforceable Through Title V Permit
17. Every ASP biofilter temperature, moisture and pH shall be monitored monthly by sampling at least one central grid location. Samples shall be taken at two depths beneath the surface. Samples shall be analyzed at in-house laboratory within 48 hours of collection. After collection of biofilter media samples, any sample holes shall be re-filled immediately with the excavated material. [District Rules 1081 and 4565; and 40 CFR 64.3] Federally Enforceable Through Title V Permit
18. Biofilter exhaust blower discharge pressure shall not exceed 5.0 psig. [District Rules 2201 and 4565; and 40 CFR 64.3] Federally Enforceable Through Title V Permit
19. Biofilter discharge surface, for testing and monitoring purposes, shall be divided into sixteen uniformly sized areas (grids). When source testing the biofilter, a minimum of 8 representative grid points shall be used. [District Rule 1070] Federally Enforceable Through Title V Permit
20. ASP Biofilter exhaust blower discharge pressures shall be monitored daily to ensure system pressures are within permitted operating range. [District Rules 1081 and 4565; and 40 CFR 64.3] Federally Enforceable Through Title V Permit
21. Biofilter media shall be "fluffed" or replaced, as needed, to maintain the exhaust blower discharge pressures within the permitted operating range. [District Rule 2201 and 40 CFR 64.3] Federally Enforceable Through Title V Permit
22. Vegetative growth shall not exceed 10% of the total biofilter surface. [District Rules 2201 and 4565; and 40 CFR 64.3] Federally Enforceable Through Title V Permit
23. Biofilter shall be checked visually at least weekly for compaction, channeling (cracks), vegetative growth or noticeable increase in detectable odors. [District Rules 2201 and 4565; and 40 CFR 64.3] Federally Enforceable Through Title V Permit
24. Biofilter media temperature shall be monitored weekly by inserting a manual temperature probe into each biofilter grid location, waiting approximately 30 to 90 seconds for the temperature to stabilize, then recording the temperature. [District Rule 1081 and 40 CFR 64.3] Federally Enforceable Through Title V Permit
25. If any ASP biofilter media temperature reading is out of range, then the biofilter moisture and pH shall be tested, and recorded, for the corresponding grid(s). [District Rule 1081 and 40 CFR 64.3] Federally Enforceable Through Title V Permit
26. If any biofilter monitoring parameter is out of range, the applicant shall perform the necessary maintenance to return the media parameter(s) to the permitted range within 1 week of detecting the problem. All grids which tested out of range shall be re-tested within one week. If any grid is still out of range during the re-test, then source testing of the biofilter shall be performed within 60 days to show compliance with the emissions limit and VOC control efficiency of the biofilter. [District Rule 2201 and 40 CFR 64.3] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

27. Demonstration of compliance with biofilter VOC daily emissions limit (DEL) and control efficiency shall be performed no less than once every two years and within 60 days of replacement of spent media or a maintenance (or repair) event which requires more than 50% of the biofilter media to be disturbed. [District Rules 1070, 2201, and 4565; and 40 CFR 64.3] Federally Enforceable Through Title V Permit
28. The following biofilter test methods shall be used: Biofilter temperature - EPA method 170.1, moisture content - TMECC 03.09 (Total solids and moisture at 70+/-5 degrees centigrade), media pH - TMECC 04.11-A (1:5 slurry pH), VOC leaks - EPA Method 21 (VOC leaks), and hydrocarbon analyzer for VOCs calibrated with certified zero and 10 ppmv methane standards. [District Rules 1081 and 4565; and 40 CFR 64.3] Federally Enforceable Through Title V Permit
29. District witnessed source testing to determine inlet and outlet VOC concentrations, flowrate, and destruction efficiency across every biofilter shall be performed not less than once every two years by an independent testing laboratory certified for SCAQMD test methods 25.3, 207.1, 1.1, 1.2, 2.1, 2.2, 2.3, 3.1 and 4.1. [District Rules 1070 and 4565] Federally Enforceable Through Title V Permit
30. Operator may use an alternate test method to those listed above for which written approval of the APCO has been obtained. [District Rules 1081 and 4565] Federally Enforceable Through Title V Permit
31. District shall be notified at least 30 days prior to any compliance source testing, and a source test plan shall be submitted for approval at least 15 days prior to testing. Official test results and field test data from compliance testing shall be submitted within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
32. The following operating parameters shall be documented during times of testing: biofilter exhaust blower discharge pressure and temperature, biofilter air flow, biofilter media temperature (all 16 grids), moisture content and pH (Only two samples of moisture and pH required, samples to be taken at one central location (from at least two feet deep)). Moisture and pH shall also be sampled, and recorded, for every grid in which the temperature is found to be out of the permitted range. [District Rule 1070] Federally Enforceable Through Title V Permit
33. VOC samples shall be analyzed by a lab certified by SCAQMD to perform identified SCAQMD test methods. [District Rule 1081] Federally Enforceable Through Title V Permit
34. Records shall be kept that demonstrate that the facility meets the Rule 4565 class one mitigation measures selected each day that a mitigation measure is performed. [District Rule 4565] Federally Enforceable Through Title V Permit
35. Operator shall maintain an inspection logbook which contains the quarterly VOC hydrocarbon analyzer readings in ppmv for each inspection location (on surface of the ASP), along with the date of the inspection. [District Rule 4565] Federally Enforceable Through Title V Permit
36. Records shall be kept of wet tons per day of biosolids fed into the feedstock mixing operation, daily amendment mix ratio, monthly biofilter temperature, moisture and pH readings, weekly biofilter media temperature and exhaust blower discharge pressure readings, associated biofilter grid locations, and annual VOC emissions on a 12 month rolling average. Records shall be kept of visual inspections and actions taken to correct compaction (and/or high biofilter blower fan pressure(s)), channeling, excessive vegetative growth or a noticeable increase in odors, including date of inspection and date actions were taken to correct problem(s). Records shall be kept of dates and hours each biofilter fan is shutdown for maintenance and/or repair. [District Rules 1070 and 4565] Federally Enforceable Through Title V Permit
37. All records shall be retained on-site for a period of at least five years and made readily available for District inspection upon request. [District Rules 1070 and 4565] Federally Enforceable Through Title V Permit
38. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7. [40 CFR 64.7] Federally Enforceable Through Title V Permit
39. If the District or EPA determine that a quality improvement plan is required under 40 CFR part 64.7(d)(2), the permittee shall develop and implement the quality improvement plan in accordance with 40 CFR part 64.8. [40 CFR 64.8] Federally Enforceable Through Title V Permit
40. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR Part 64.9. [40 CFR 64.9] Federally Enforceable Through Title V Permit

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

Appendix B
Draft ATCs

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-4212-1-7

LEGAL OWNER OR OPERATOR: SOUTH KERN INDUSTRIAL CENTER LLC
MAILING ADDRESS: PO BOX 265
TAFT, CA 93268

LOCATION: 2653 SANTIAGO ROAD
TAFT, CA 93268

EQUIPMENT DESCRIPTION:

MODIFICATION OF BIOSOLIDS AND AMENDMENTS RECEIVING/MIXING OPERATION, INCLUDING AMENDMENT STORAGE AREA, FEED HOPPER WITH WATER SPRAY MISTERS, CONVEYOR DISCHARGING TO AMENDMENT PILES IN MIXING BUILDING, BIOSOLIDS UNLOADING INTO MIXING BUILDING, WITH MIXING BUILDING AND COVERED FEEDSTOCK CONVEYOR VENTED TO MIXING BUILDING BIOFILTER: DELETE SLC AND REMOVE "ACTIVE" AND "CURING" DESIGNATIONS FOR ASP'S

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. This ATC shall be implemented concurrently with ATC S-4212-2-7. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Air pollution equipment (blower fans, ducting, biofilter, etc) shall be properly maintained in good operating condition at all times, except for times of maintenance and/or repair allowed by conditions below. [District Rule 2201] Federally Enforceable Through Title V Permit
5. At least one of two biofilter bower fans shall be operating at all times except for down for a total of 48 hours per 6-month time period for the purpose of maintenance and/or repair. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 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 Marjolle, Director of Permit Services

S-4212-1-7, Jul 7 2015 7:02AM -- TORID : Joint Inspection NOT Required

6. Feedstock mixing shall be performed in the mixing building, and mixing building shall be vented to biofilter. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Conveyors transferring feedstock from mixing building to feedstock pad shall be covered and ventilated to receiving building biofilter. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Biofilter shall be equipped with operational humidifier and sprinkler systems, and shall be used as needed to maintain optimum biofilter media moisture content. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Amendment feed hopper shall be equipped with operational mist type water spray, and used as needed to ensure visible emissions do not exceed 5% opacity for more than 3 minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
10. VOC destruction efficiency across the biofilter serving the mixing building shall not be less than 80%, or total VOC emission rate from mixing building shall not exceed 2 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. NH₃ destruction efficiency across the biofilter serving the mixing building shall not be less than 80%, or total NH₃ emission rate from mixing building shall not exceed 2 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. There shall be no visible emissions greater than 5% opacity for more than three minutes in any one hour, from receiving/mixing operation amendment truck unloading, feed hopper loading, outdoor conveyor transfer points, or feed stock stacking conveyor. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Maximum quantity of biosolids introduced into the feedstock mixers shall not exceed 350,000 wet tons on a rolling 12-month basis. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Maximum quantity of amendment introduced into the feedstock mixing operation shall not exceed 320,000 wet tons on a rolling 12-month basis. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Maximum quantity of feedstock discharged from the mixing operation shall not exceed 6,466 wet tons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Emissions from amendment feed hopper shall not exceed 0.0001 lb-PM₁₀/ton. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Emissions from amendment conveyor transfer points shall not exceed 4.5E-5 lb-PM₁₀/ton. [District Rule 2201] Federally Enforceable Through Title V Permit
18. VOC emissions from the biofilter serving the mixing building shall not exceed 7.4 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
19. NH₃ emissions from the biofilter shall not exceed 0.4 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Biofilter media shall be maintained such that the pH remains between 5.0 and 8.0, moisture content between 40 and 80% and temperature between 50 and 95 degrees F, as measured at a depth of at least 2 feet below the media surface. [District Rule 2201] Federally Enforceable Through Title V Permit
21. Biofilter discharge surface, for testing and monitoring purposes, shall be divided into sixteen uniformly sized areas (grids). When source testing the biofilter, a minimum of 8 representative grid points shall be used. [District Rule 1070] Federally Enforceable Through Title V Permit
22. Biofilter exhaust blower discharge pressure shall not exceed 5.0 psig. [District Rule 2201] Federally Enforceable Through Title V Permit
23. Biofilter exhaust blower discharge pressure shall be monitored weekly to ensure system pressure is within permitted operating range. [District Rule 1081] Federally Enforceable Through Title V Permit
24. Biofilter moisture, pH and temperature shall be monitored monthly by sampling one central grid location. Samples shall be taken at two depths beneath the surface. Samples shall be analyzed at in-house laboratory within 48 hours of collection. After collection of biofilter media samples, any sample holes shall be re-filled immediately with the excavated material. [District Rule 1081] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

25. Biofilter media shall be "fluffed" or replaced as needed to maintain the exhaust blower discharge pressure within the normal operating range. [District Rule 2201] Federally Enforceable Through Title V Permit
26. Vegetative growth shall not exceed 10% of the total biofilter surface. [District Rule 2201] Federally Enforceable Through Title V Permit
27. Biofilter shall be checked visually at least weekly for compaction, channeling (cracks), vegetative growth or noticeable increase in detectable odors. [District Rule 2201] Federally Enforceable Through Title V Permit
28. Biofilter media temperature shall be monitored weekly by inserting a manual temperature probe into each biofilter grid location, waiting approximately 30 to 90 seconds for the temperature to stabilize, then recording the temperature. [District Rule 1081] Federally Enforceable Through Title V Permit
29. If any biofilter media temperature reading is out of range, then the biofilter moisture and pH shall be tested, and recorded, for the corresponding grid(s). [District Rule 1081] Federally Enforceable Through Title V Permit
30. If any biofilter monitoring parameter is out of range, the applicant shall perform the necessary maintenance to return the media parameter(s) to the permitted range within 1 week of detecting the problem. All grids which tested out of range shall be re-tested within one week. [District Rule 2201] Federally Enforceable Through Title V Permit
31. Demonstration of compliance with biofilter VOC daily emissions limit (DEL) and control efficiency shall be made within 60 days of replacement of spent media which requires more than 50% of the biofilter media to be replaced. If any ASP biofilters are replacing media concurrent with the replacement of the mixing building biofilter media, then the ASP biofilter source testing may be used as representative testing in demonstrating compliance with VOC control efficiency requirement for the mixing building biofilter. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
32. District witnessed source testing of biofilter performed to measure VOC and NH₃ inlet concentrations, inlet flowrate, and VOC and NH₃ destruction efficiencies across the biofilter, shall be performed by an independent testing laboratory certified for SCAQMD methods 25.3, 207.1, 1.1, 1.2, 2.1, 2.2, 2.3, 3.1 and 4.1. [District Rule 1070] Federally Enforceable Through Title V Permit
33. The following biofilter test methods shall be used: Biofilter temperature - EPA method 170.1, moisture content - TMECC 03.09 (Total solids and moisture at 70+/-5 degrees centigrade), media pH - TMECC 04.11-A (1:5 slurry pH), VOC leaks - EPA Method 21 (VOC leaks), and hydrocarbon analyzer for VOCs calibrated with certified zero and 10 ppmv methane standards. [District Rule 1081] Federally Enforceable Through Title V Permit
34. Operator may use an alternate test method to those listed above for which written approval of the APCO has been obtained. [District Rule 1081] Federally Enforceable Through Title V Permit
35. District shall be notified at least 30 days prior to any compliance source testing, and a source test plan shall be submitted for approval at least 15 days prior to testing. Official test results and field test data from compliance testing shall be submitted within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
36. The following operating parameters shall be documented during times of testing: biofilter exhaust blower discharge pressure and temperature, biofilter air flow, biofilter media temperature (all 16 grids), moisture content and pH (Only two samples of moisture and pH required, samples to be taken at one central location (from at least two feet deep)). Moisture and pH shall also be sampled, and recorded, for every grid in which the temperature is found to be out of the permitted range. [District Rule 1070] Federally Enforceable Through Title V Permit
37. VOC and NH₃ samples shall be analyzed by a lab certified by SCAQMD to perform identified SCAQMD test methods. [District Rule 1081] Federally Enforceable Through Title V Permit
38. Records shall be kept of wet tons per day of biosolids fed into the feedstock mixing operation, daily amendment mix ratio, monthly biofilter temperature, moisture and pH readings, weekly biofilter media temperature and exhaust blower discharge pressure readings, associated biofilter grid locations, and annual VOC emissions on a 12 month rolling average. Records shall be kept of visual inspections and actions taken to correct compaction (and/or high biofilter blower fan pressure(s)), channeling, excessive vegetative growth or a noticeable increase in odors, including date of inspection and date actions were taken to correct problem(s). Records shall be kept of dates and hours each biofilter fan is shutdown for maintenance and/or repair. Records shall be retained on-site for a period of at least five years and made readily available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
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PERMIT NO: S-4212-2-6

LEGAL OWNER OR OPERATOR: SOUTH KERN INDUSTRIAL CENTER LLC
MAILING ADDRESS: PO BOX 265
TAFT, CA 93268

LOCATION: 2653 SANTIAGO ROAD
TAFT, CA 93268

EQUIPMENT DESCRIPTION:

MODIFICATION OF BIOSOLIDS CO-COMPOSTING OPERATION INCLUDING TWO NEGATIVELY AERATED STATIC PILE (ASP) ACTIVE COMPOST AREAS, EACH VENTED TO IT'S OWN BIOFILTER (APPROXIMATELY 19,962 SQ FT EACH), AND TWO ASP CURING COMPOST AREAS, EACH VENTED TO IT'S OWN BIOFILTER (APPROXIMATELY 11,234 SQ FT EACH); INCLUDING BLOWER FANS, COOLING FANS, HUMIDIFIERS AND BIOFILTER SURFACE SPRINKLER SYSTEM: CONVERT TO POSITIVE ASP COMPOST OPERATION WITH FINISHED COMPOST BIOFILTER COVER AND DELETE SLC AND REMOVE "ACTIVE" AND "CURING" DESIGNATIONS FOR ASP'S

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. This ATC shall be implemented concurrently with ATC S-4212-1-7. [District Rule 2201] Federally Enforceable Through Title V Permit
4. All materials for processing shall be maintained adequately moist to prevent visible emissions in excess of 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
5. Co-composting shall be performed in positively aerated static piles (+ASPs) with a biofilter layer and an engineered, under pile, grid aeration system. [District Rules 2201 and 4565] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director, APCO

Arnaud Marjollet, Director of Permit Services

S-4212-2-6, Jul 7 2015 7:02AM - TORID : Joint Inspection NOT Required

6. Water shall be applied as needed to maintain optimum biofilter cap media temperature and moisture content. [District Rules 2201 and 4565] Federally Enforceable Through Title V Permit
7. Air pollution equipment (variable speed drive blower fans, ducting, etc.) shall be properly maintained in accordance with manufacturer recommendations, except for times of maintenance and/or repair allowed by conditions below. [District Rules 2201 and 4565] Federally Enforceable Through Title V Permit
8. Mechanical equipment associated with each +ASP may be taken out of service for a total of 48 hours per 6-month time period for the purpose of maintenance and/or repair. [District Rules 2020 and 2201] Federally Enforceable Through Title V Permit
9. Each +ASP shall be covered with at least 24" of finished compost within two days of constructing the +ASP (placing feedstock in that +ASP zone). [District Rules 2201 and 4565] Federally Enforceable Through Title V Permit
10. The VOC destruction efficiency across each biofilter cap serving the co-compost +ASPs shall not be less than 80%, or, the total VOC emission rate shall not exceed 2 pounds in any one day. [District Rules 2201 and 4565] Federally Enforceable Through Title V Permit
11. The NH₃ destruction efficiency across each biofilter cap serving the co-compost +ASPs shall not be less than 80%, or, the total NH₃ emission rate shall not exceed 2 pounds in any one day. [District Rules 2201 and 4565] Federally Enforceable Through Title V Permit
12. Maximum quantity of feedstock (mixed biosolids and amendments) introduced into co-compost +ASPs shall not exceed 6,466 tons/day nor 670,000 tons/year (based on a rolling 12 months). [District Rules 2201 and 4565] Federally Enforceable Through Title V Permit
13. VOC emissions from this permit unit (includes all +ASP surfaces with their biofilter caps) shall not exceed 0.23826 b/ton throughput. Throughput is defined as wet ton, as mixed, feedstock introduced into compost ASPs. [District Rules 2201 and 4565] Federally Enforceable Through Title V Permit
14. VOC emissions from the biofilter caps serving the co-composting zones shall not exceed 1,540.6 lb/day or 159,634 lb/year. [District Rules 2201 and 4565] Federally Enforceable Through Title V Permit
15. NH₃ emissions from the +ASPs shall not exceed 0.2203lb/ton throughput. Throughput is defined as wet ton, as mixed, feedstock introduced into compost +ASPs. [District Rules 2201 and 4565] Federally Enforceable Through Title V Permit
16. NH₃ emissions from the biofilter caps serving the co-composting zones shall not exceed 1424.5 lb/day. [District Rules 2201 and 4565] Federally Enforceable Through Title V Permit
17. Permittee shall implement at least two (2) Rule 4565 class one mitigation measures, in addition to one (1) class two mitigation measures for active composting and one (1) class two mitigation measure for curing composting. [District Rules 2201 and 4565] Federally Enforceable Through Title V Permit
18. Each biofilter cap aeration fan shall operate as needed to maintain moisture content between 45 and 80% and temperature between 80 and 120 degree F, as measured at an appropriate depth below the media surface. [District Rules 2201 and 4565] Federally Enforceable Through Title V Permit
19. +ASPs shall have no measurable increase (<0.45 ppmv increase) over background levels of hydrocarbons within three feet of any surface of any +ASP/biofilter caps. Testing shall be performed once per quarter in accordance with the requirements of Rule 4565 section 5.4 using a District approved analyzer. [District Rules 2201 and 4565] Federally Enforceable Through Title V Permit
20. Every +ASP biofilter cap temperature and moisture shall be monitored monthly by sampling at least one location on each +ASP. Samples shall be taken at two depths beneath the surface. Samples shall be analyzed at in-house laboratory within 48 hours of collection. After collection of biofilter media samples, any sample holes shall be filled immediately with the excavated material. [District Rules 2201 and 4565] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

21. +ASP biofilter cap surface, for source testing purposes, shall be divided into two rectangular sub-zones uniformly sized areas (two half zones per zone). When source testing the +ASP/biofilter cap, a minimum of four representative test points shall be used testing along diagonal transect lines per sub-zones with six points along the line with testing on the four inner points on the transect line. Testing shall be performed on eight days of the 45 day compost life-cycle (recommended Day 1,3,5,7,14,21,28,45) for a total of 48 flux samples with an additional 10% QC samples (5% blank samples and 5% replicate samples) [District Rules 2201 and 4565] Federally Enforceable Through Title V Permit
22. Biofilter media cap shall be maintained at a depth of 18" to 24", as needed, to maintain the effective biofilter layer on the compost surface. [District Rules 2201 and 4565] Federally Enforceable Through Title V Permit
23. Biofilter caps shall be checked visually at least weekly for compaction, moisture level, channeling (cracks), or noticeable increase in detectable odors. [District Rules 2201 and 4565] Federally Enforceable Through Title V Permit
24. Biofilter cap media temperature shall be monitored weekly with automatic or manual temperature probe(s) inserted into a minimum of 4 representative test points along an approximate diagonal transect line for each ASP zone. If manual probes are utilized the probe shall remain in place for 30 to 90 seconds to allow the temperature reading to stabilize before recording the temperature. [District Rules 2201 and 4565] Federally Enforceable Through Title V Permit
25. If any +ASP/biofilter cap media temperature reading is out of range, then the biofilter cap moisture shall be tested, and recorded, for the corresponding zone(s). [District Rules 2201 and 4565] Federally Enforceable Through Title V Permit
26. If any biofilter cap monitoring parameter is out of range, the applicant shall perform the necessary maintenance to return the media parameter(s) to the permitted range within one week of detecting the problem. All grids which tested out of range shall be re-tested within one week. If any grid is still out of range additional biofilter media shall be added within ten days until the monitoring parameters are documented to be within appropriate operational ranges. [District Rules 2201 and 4565] Federally Enforceable Through Title V Permit
27. Demonstration of compliance with biofilter cap VOC daily emissions limit (DEL) and control efficiency shall be performed during the third composting cycle after conversion to the +ASP system (120 to 180 days after implementation of this ATC) and not less than once every two years thereafter. [District Rules 2201 and 4565] Federally Enforceable Through Title V Permit
28. The following biofilter cap test methods shall be used: biofilter temperature - EPA method 170.1, moisture content - TMECC 03.09 (Total solids and moisture at 70+1 to 5 degrees centigrade), VOC leaks - EPA Method 21 (VOC leaks), and hydrocarbon analyzer for VOCs calibrated with certified zero and 10 ppmv methane standards. [District Rules 2201 and 4565] Federally Enforceable Through Title V Permit
29. District witnessed source testing to determine surface VOC concentrations, flowrate, and destruction efficiency across selected +ASP biofilter caps shall be performed by an independent testing laboratory certified for SCAQMD test methods 25.3, and 201.1. [District Rules 2201 and 4565] Federally Enforceable Through Title V Permit
30. Operator may use an alternate test method to those listed above for which written approval of the APCO has been obtained. [District Rules 2201 and 4565] Federally Enforceable Through Title V Permit
31. District shall be notified at least 30 days prior to any compliance source testing, and a source test plan shall be submitted for approval at least 15 days prior to testing. Official test results and field test data from compliance testing shall be submitted within 60 days thereafter. [District Rules 2201 and 4565] Federally Enforceable Through Title V Permit
32. VOC samples shall be analyzed by a lab certified by SCAQMD to perform identified SCAQMD test methods. [District Rules 2201 and 4565] Federally Enforceable Through Title V Permit
33. Records shall be kept that demonstrate that the facility meets the Rule 4565 class one mitigation measures selected each day that a mitigation measure is performed. [District Rules 2201 and 4565] Federally Enforceable Through Title V Permit
34. Operator shall maintain an inspection logbook which contains the quarterly VOC hydrocarbon analyzer readings in ppmv for each inspection location (on surface of the +ASP/biofilter cap), along with the date of the inspection. [District Rules 2201 and 4565] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

35. Records shall be kept of wet tons per day of biosolids fed into the feedstock mixing operation, daily amendment mix ratio, monthly biofilter cap temperature, moisture readings, weekly biofilter cap temperature and blower inlet pressure readings, associated biofilter cap zone locations, and annual VOC emissions on a 12 month rolling average. Records shall be kept of visual inspections and actions taken to correct compaction (and/or high +ASP/biofilter cap blower fan pressure(s)), channeling, excessive vegetative growth or a noticeable increase in odors, including date of inspection and date actions were taken to correct problem(s). Records shall be kept of dates and hours each +ASP fan is taken out of service for maintenance and/or repair. [District Rules 2201 and 4565] Federally Enforceable Through Title V Permit
36. All records shall be retained on-site for a period of at least five years and made readily available for District inspection upon request. [District Rules 2201 and 4565] Federally Enforceable Through Title V Permit
37. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7 [40 CFR Part 64.7] Federally Enforceable Through Title V Permit
38. If the District or EPA determine that a quality improvement plan is required under 40 CFR part 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 64.8] Federally Enforceable Through Title V Permit
39. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR Part 64.9. [40 CFR Part 64.9] Federally Enforceable Through Title V Permit

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