



# San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

MAY - 6 2010

Gerardo C. Rios, Chief  
Permits Office (AIR-3)  
U.S. EPA - Region IX  
75 Hawthorne St.  
San Francisco, CA 94105

**Re: Notice of Preliminary Decision – Title V Permit Renewal  
District Facility # C-72  
Project # C-1090006**

Dear Mr. Rios:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Baker Commodities, Inc. for its animal rendering plant located at 16801 West Jensen Avenue in Kerman, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 45-day comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,

David Warner  
Director of Permit Services

#### Attachments

C: Brian Clerico, Permit Services Engineer

**Sayed Sadredin**  
Executive Director/Air Pollution Control Officer

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

**Central Region (Main Office)**  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
Tel: (559) 230-6000 FAX: (559) 230-6061  
[www.valleyair.org](http://www.valleyair.org)

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



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

MAY - 6 2010

Mike Tollstrup, Chief  
Project Assessment Branch  
Air Resources Board  
P O Box 2815  
Sacramento, CA 95812-2815

**Re: Notice of Preliminary Decision - Title V Permit Renewal  
District Facility # C-72  
Project # C-1090006**

Dear Mr. Tollstrup:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Baker Commodities, Inc. for its animal rendering plant located at 16801 West Jensen Avenue in Kerman, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 30-day comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,

A handwritten signature in black ink, appearing to read "David Warner", with a long horizontal flourish extending to the right.

David Warner  
Director of Permit Services

**Attachments**

C: Brian Clerico, Permit Services Engineer

**Sayed Sadredin**  
Executive Director/Air Pollution Control Officer

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

MAY - 6 2010

Jay Pezoldt  
Baker Commodities, Inc.  
16801 W Jensen Ave  
Kerman, CA 93630

**Re: Notice of Preliminary Decision - Title V Permit Renewal  
District Facility # C-72  
Project # C-1090006**

Dear Mr. Pezoldt:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for Baker Commodities, Inc. for its animal rendering plant located at 16801 West Jensen Avenue in Kerman, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. Please submit your written comments on this project within the 30-day comment period which begins on the date of publication of the public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Sincerely,

A handwritten signature in black ink, appearing to read "David Warner", with a long horizontal flourish extending to the right.

David Warner  
Director of Permit Services

Attachments

C: Brian Clerico, Permit Services Engineer

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

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Fresno Bee

**NOTICE OF PRELIMINARY DECISION  
FOR THE PROPOSED RENEWAL OF  
THE FEDERALLY MANDATED OPERATING PERMIT**

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District solicits public comment on the proposed renewal of the Federally Mandated Operating Permit to Baker Commodities, Inc. for its animal rendering plant located at 16801 West Jensen Avenue in Kerman, California.

The District's analysis of the legal and factual basis for this proposed action, project #C-1090006, is available for public inspection at [http://www.valleyair.org/notices/public\\_notices\\_idx.htm](http://www.valleyair.org/notices/public_notices_idx.htm) and the District office at the address below. There are no emission changes associated with this proposed action. This will be the public's only opportunity to comment on the specific conditions of the proposed renewal of the Federally Mandated Operating permit. If requested by the public, the District will hold a public hearing regarding issuance of this renewed permit. For additional information, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900. Written comments on the proposed renewed permit must be submitted within 30 days of the publication date of this notice to DAVID WARNER, DIRECTOR OF PERMIT SERVICES, SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 1990 E. GETTYSBURG AVE, FRESNO, CALIFORNIA 93726-0244.

**SAN JOAQUIN VALLEY  
AIR POLLUTION CONTROL DISTRICT**

**Proposed Title V Permit Renewal Evaluation  
Baker Commodities, Inc.  
C-72**

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# **TITLE V PERMIT RENEWAL EVALUATION**

## **Rendering Plant**

**Engineer:** Brian Clerico  
**Date:** April 30, 2010

**Facility Number:** C-72  
**Facility Name:** Baker Commodities, Inc.  
**Mailing Address:** 16801 W Jensen Ave  
Kerman, CA 93630  
**Contact Name:** Jay Pezoldt  
**Phone:** (559) 846-9393

**Responsible Official:** Jay Pezoldt  
**Title:** Assistant General Manager

**Project # :** S-1090006  
**Deemed Complete:** January 7, 2009

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### **I. PROPOSAL**

Baker Commodities, Inc. was issued a Title V Permit on November 30, 2004. As required by District Rule 2520, the applicant is requesting a permit renewal. The existing Title V Permit shall be reviewed and modified to reflect all applicable District and federal rules updated, removed, or added since the issuance of the initial Title V Permit.

In addition, there are three outstanding Authority to Construct (ATC's) permits – C-72-3-6, '-7-6, and '-8-3 (see Appendix D) – that have been implemented by the facility which have not yet been incorporated into the Title V Permit. The facility has submitted an application for a Minor Modification (project C-1063447) to their Title V Permit to incorporate ATC's C-72-3-6, '-7-6, and '-8-3; however, instead of being incorporated into the Title V Permit under Minor Modification project C-1063447, the ATC's will be incorporated into the Title V Permit with this Title V Permit Renewal.

The purpose of this evaluation is to provide the legal and factual basis for all updated applicable requirements and to determine if the facility will comply with these updated requirements. It also specifically identifies all additions, deletions, and/or changes made to permit conditions or equipment descriptions.

## II. FACILITY LOCATION

Baker Commodities, Inc. is located at 16801 West Jensen Avenue in Kerman, California.

## III. EQUIPMENT LISTING

See Attachment C for a list of all permitted equipment at the facility.

## IV. GENERAL PERMIT TEMPLATE USAGE

The applicant does not propose to use any model general permit templates.

## V. SCOPE OF EPA AND PUBLIC REVIEW

The applicant is not requesting any model general permit templates. Therefore, all federally enforceable conditions in this current Title V Permit will be subject to EPA and public review.

## VI. FEDERALLY ENFORCEABLE REQUIREMENTS

### I. Rules Updated

- District Rule 2020, Exemptions  
(adopted September 19, 1991 ⇒ amended December 20, 2007)
- District Rule 4101, Visible Emissions  
(adopted May 21, 1992 ⇒ amended February 17, 2005)
- District Rule 4306, Boilers, Steam Generators, and Process Heaters – Phase 3 (adopted September 18, 2003 ⇒ amended October 16, 2008)
- District Rule 4621, Gasoline Transfer into Stationary Storage Containers Delivery Vessels, and Bulk Plants  
(adopted April 11, 1991 ⇒ amended December 20, 2007)
- District Rule 4622, Gasoline Transfer into Motor Vehicle Fuel Tanks  
(adopted May 21, 1992 ⇒ amended December 20, 2007)
- District Rule 8011, General Requirements  
(adopted November 15, 2001 ⇒ amended August 19, 2004)

- District Rule 8021, Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities  
(adopted November 15, 2001 ⇒ amended August 19, 2004)
- District Rule 8031, Bulk Materials  
(adopted November 15, 2001 ⇒ amended August 19, 2004)
- District Rule 8041, Carryout and Trackout  
(adopted November 15, 2001 ⇒ amended August 19, 2004)
- District Rule 8051, Open Areas  
(adopted November 15, 2001 ⇒ amended August 19, 2004)
- District Rule 8061, Paved and Unpaved Roads  
(adopted November 15, 2001 ⇒ amended August 19, 2004)
- District Rule 8071, Unpaved Vehicle/Equipment Traffic Areas  
(adopted November 15, 2001 ⇒ amended September 16, 2004)
- 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos
- 40 CFR Part 82, Subparts B and F, Stratospheric Ozone

#### **J. Rules Removed**

No rules have been removed since the initial Title V Permit for this facility was issued.

#### **K. Rules Added**

- 40 CFR Part 64, Compliance Assurance Monitoring (CAM)

#### **L. Rules Not Updated**

- District Rule 1081, Source Sampling (amended December 16, 1993)
- District Rule 1100, Equipment Breakdown (amended December 17, 1992)
- District Rule 1160, Emission Statements (adopted November 18, 1992)
- District Rule 2010, Permits Required (amended December 17, 1992)
- District Rule 2031, Transfer of Permits (amended December 17, 1992)

- District Rule 2040, Applications (amended December 17, 1992)
- District Rule 2070, Standards for Granting Applications (amended December 17, 1992)
- District Rule 2080, Conditional Approval (amended December 17, 1992)
- District Rule 2201, New and Modified Stationary Source Review Rule (adopted September 19, 1991 ⇒ amended December 19, 2002)
- District Rule 2520, Federally Mandated Operating Permits (amended June 21, 2001)
- District Rule 4104, Reduction of Animal Matter (adopted December 17, 1992)
- District Rule 4201, Particulate Matter Concentration (adopted May 21, 1992 ⇒ amended December 19, 2002)
- District Rule 4202, Particulate Matter - Emission Rate (adopted May 21, 1992 ⇒ amended December 19, 2002)
- District Rule 4301, Fuel Burning Equipment (adopted May 21, 1992 ⇒ amended December 19, 2002)
- District Rule 4305, Boilers, Steam Generators, and Process Heaters – Phase 2 (adopted December 16, 1993 ⇒ amended August 21, 2003)
- District Rule 4351, Boilers, Steam Generators, and Process Heaters – Phase 1 (adopted October 20, 1994 ⇒ amended August 21, 2003)
- District Rule 4601, Architectural Coatings (adopted December 17, 1992 ⇒ amended December 17, 2009)

## **VII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE**

For each Title V source, the District issues a single permit that contains both the federally enforceable requirements as well as District-only requirements. The District-only requirements are not a part of the Title V Operating Permits. The terms and conditions that are part of the facility's Title V Permit are designated as "Federally Enforceable Through Title V Permit".

For this facility, the following rules are not federally enforceable and will not be discussed in detail:

## **A. Rules Added**

- District Rule 4320, Advanced Emissions Reduction Options for Boiler, Steam Generators, and Process Heaters Greater Than 5.0 MMBtu/hr (adopted October 16, 2008)

This rule has not yet been adopted into the SIP. Units C-72-7 and '-8 are subject to this rule, and the facility has proposed in their Rule 4320 Emission Control Plan to comply with this rule per Section 5.1.2 by paying an annual emissions fee to the District as specified in Section 5.3 and by complying with the particulate matter control requirements specified in Section 5.4.

### Renewal PTO's C-72-7-9

Conditions #1 and 60 on current PTO will be carried over to the renewal PTO as #1 and 45 and will ensure compliance with this rule.

### Renewal PTO's C-72-8-5

- Conditions #1 and 65 on current PTO will be carried over to the renewal PTO as #1 and 61.

## **B. Rules Not Updated**

- District Rule 1070, Inspections (amended December 17, 1992)

There are no additions, deletions, modifications to any of the Rule 1070-based permit conditions on any of the permits.

- District Rule 4102, Nuisance (Adopted May 21, 1992 ⇒ Amended December 17, 1992)

### Renewal PTO C-72-0-1

There are no additions, deletions, modifications to any of the Rule 4102-based permit conditions.

### Renewal PTO C-72-3-9

There are no additions, deletions, modifications to any of the Rule 4102-based permit conditions.

### Renewal PTO C-72-7-9

Condition #5 on the current PTO was modified to condition #4 on the renewal PTO to include the combustion of denatured yellow grease. There are no other modifications to Rule 4102-based permit conditions.

Renewal PTO C-72-8-5

Condition #3 on the current PTO was modified to condition #4 on the renewal PTO to include the combustion of denatured yellow grease. There are no other modifications to Rule 4102-based permit conditions.

**VIII. FEDERALLY ENFORCEABLE PERMIT REQUIREMENTS**

The purpose of this evaluation is to review changes to federally enforceable requirements; therefore, this section will address rules and permit conditions that have been amended or added since the issuance of the initial Title V Permit.

**A. District Rule 1100 - Equipment Breakdown**

Although Rule 1100 is by itself not federally enforceable, it is referenced as one of the rules on which three federally enforceable conditions are based on the facility-wide permit.

Renewal PTO C-72-0-1 (facility-wide permit):

Conditions #1, 2, and 11 from the current PTO were included as conditions #1, 2, and 11 on the renewal PTO except that the reference to county rules other than Fresno County – where the facility is located – was removed.

**B. District Rule 1081 – Source Sampling**

Renewal PTO C-72-3-9

Renewal PTO C-72-3-9 includes the modifications authorized by ATC C-72-3-6, which is being incorporated into the Title V Permit as part of this renewal. Conditions #30 through 39, which list the approved source test methods and procedures, have been removed from the current PTO C-72-3-10. Removal of these conditions does not constitute any relaxation in the testing requirements since periodic testing was never required and an initial source test for the thermal oxidizer while firing on yellow grease was already conducted in March 6-7, 2002. No periodic source testing has ever been required for the thermal oxidizer because 1) it is a nuisance odor control device and not a criteria pollutant control device, 2) an estimated 80% of the NOx emissions come from the presence of ammonia emitted from the rendering operation; therefore, the fuel itself has only a marginal influence on the amount of NOx emitted.

Renewal PTO C-72-8-5

The rule reference for condition #35 on the current PTO was modified to condition #33 on the renewal PTO by removing references to all county rules other than Fresno County, which is the location for this facility.

**C. District Rule 2020 - Exemptions**

District Rule 2020 lists equipment that is exempt from obtaining permits and specifies recordkeeping requirements to verify such exemptions.

The amendments to this rule – which are not approved for inclusion into the SIP – do not have any affect on current permit requirements.

**Renewal PTO C-72-0-1 (facility-wide permit):**

Condition #4 from the current PTO was included as condition #4 on the renewal PTO.

**D. District Rule 2201 - New and Modified Stationary Source Review (NSR) Rule**

A Title V Permit Renewal does not by itself constitute a “modification” under District Rule 2201. Section 3.25 defines a “modification” as an action including at least one of the following:

- 1) Any change in hours of operation, production rate, or method of operation of an existing emissions unit, which would necessitate a change in permit conditions.
- 2) Any structural change or addition to an existing emissions unit which would necessitate a change in permit conditions. Routine replacement shall not be considered to be a structural change.
- 3) An increase in emissions from an emissions unit caused by a modification of the Stationary Source when the emissions unit is not subject to a daily emissions limitation.
- 4) Addition of any new emissions unit which is subject to District permitting requirements.
- 5) A change in a permit term or condition proposed by an applicant to obtain an exemption from an applicable requirement to which the source would otherwise be subject.

However, since this Renewal is also incorporating ATC's C-72-3-6, '-7-6, and '-8-3 into the Title V Permit, any Rule 2201-based modifications authorized under those ATC's will be addressed here.

**Renewal PTO C-72-0-1 (facility-wide permit):**

There are no Rule 2201-based conditions on this permit.

Renewal PTO C-72-1-4:

There are no changes to any of the existing Rule 2201 conditions #3, 4, 14, 15, and 19.

Renewal PTO C-73-3-9:

ATC C-72-3-6 authorizes the facility to use "denatured yellow grease" to fuel the thermal oxidizer. The thermal oxidizer controls nuisance odors from the rendering plant. "Denatured yellow grease" consists of 99.0% yellow grease and no more than 1.0% diesel fuel by volume. Both yellow grease and diesel are already permitted fuels for the thermal oxidizer. The Rule 2201 modifications authorized by ATC C-76-3-6 are being included in this Title V Renewal application.

The current PTO C-72-3-10 has two virtually identical NSR-based conditions requiring continuous monitoring of the thermal oxidizer temperature: #10 and 45. The conditions will be combined as condition #9 on the Renewal PTO. There are no other changes to any of the Rule 4104-based conditions.

Conditions #14 and 17 have been modified to include reference to the use of denatured yellow grease. Conditions #15 and 16 are new.

Conditions #25 – 29 have been modified to include a reference to denatured yellow grease.

Condition #29 on the current PTO C-76-3-10, which pertains to conducting an "initial" source test on the thermal on yellow grease, was been removed from the Renewal PTO C-76-3-9. Removal of is condition does not constitute any relaxation in the testing requirements since an initial source test for the thermal oxidizer while firing on yellow grease was conducted on March 6-7, 2002. No periodic source testing has ever been required for the thermal oxidizer because 1) it is a nuisance odor control device and not a criteria pollutant control device, 2) an estimated 80% of the NOx emissions come from the presence of ammonia emitted from the rendering operation; therefore, the fuel itself has only a marginal influence on the amount of NOx emitted.<sup>1</sup>

No other Rule 2201-based conditions have been modified from the current PTO.

Renewal PTO C-72-6-2:

There are no Rule 2201-based conditions on this permit.

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<sup>1</sup> The NOx emissions from the thermal oxidizer while firing on natural gas were measured at 0.337 lb-NOx/MMBtu, whereas the NOx emissions from the thermal oxidizer while firing on yellow grease were measured at 0.325 lb-NOx/MMBtu.

Renewal PTO C-73-7-9:

ATC C-72-7-6 authorizes the facility to use "denatured yellow grease" to fuel the boiler, which consists of 99% yellow grease and 1% diesel fuel. The Rule 2201 modifications authorized by ATC C-76-7-6 are being included in this Title V Renewal application.

Condition #4 on current PTO was modified to condition #6 on the renewal PTO to allow the use of denatured yellow grease. Conditions #7 and 8 are new.

Conditions #21, 22, and 24 were modified as #14, 15, and 17 on the renewal PTO.

Conditions #25 and 26 on the current PTO were retained as conditions #18 and 19 on the renewal PTO.

Conditions #27 through 34 on C-72-7-7 were originally removed by ATC C-72-7-4 in project C-1043495; however, in the subsequent Minor Modification to incorporate ATC C-72-7-4 into Baker's Title V Permit, these conditions were retained without explanation. ATC C-72-7-6 had used ATC C-72-7-4 as the base permit, and so in keeping with the assumptions used in the approval of ATC C-72-7-6, conditions #27 through 34 on the current PTO are extraneous and will not be carried over to the Renewal PTO C-72-7-9.

Conditions #51 through 55 on the current PTO were retained as conditions #38 through 42 on the renewal PTO.

Condition #58 on the current PTO was modified to condition #43 on the renewal PTO.

Condition #59 on the current PTO was retained as condition #44 on the renewal PTO.

Renewal PTO C-73-8-5:

ATC C-72-8-3 authorizes the facility to use "denatured yellow grease" to fuel the boiler. Both yellow grease and diesel are already permitted fuels for the boiler, although diesel is only permitted during natural gas curtailment. The Rule 2201 modifications authorized by ATC C-76-8-3 are being included in this Title V Renewal application.

Condition #7 on the current PTO was modified to condition #6 on the renewal PTO to allow the use of denatured yellow grease. Conditions #7 and 8 are new.

Condition #9 on the current PTO was modified to condition #9 on the renewal PTO to allow the use of diesel fuel in denatured yellow grease.

Condition #14 was modified to condition #12 on the renewal PTO to include the use of denatured yellow grease.

Condition #11 was modified to condition #15 on the renewal PTO to include the use of denatured yellow grease.

Condition #18 was modified to condition #19 on the renewal PTO.

Conditions #20 through 25 on the current PTO were modified as conditions #21 through 26 on the renewal PTO.

Condition #38 on the renewal PTO is new. It requires an initial source test to be completed within 60 days of firing on denatured yellow grease. The initial source test has not been performed according to District inspection and source test records; therefore, this condition will be retained.

Condition #40 on the current PTO has been modified to condition #40 on the renewal PTO. This condition pertaining to source test frequency for yellow grease (and denatured yellow grease) was modified to improve its enforceability and to be consistent with the periodic source testing requirement for yellow grease (and denatured yellow grease) on permit C-72-7.

Condition #63 was modified to condition #59 on the renewal PTO to include denatured yellow grease.

Renewal PTO C-72-9-2:

There are no changes to any of the existing Rule 2201 conditions #2, 3, 7, 8, and 10.

**E. District Rule 2520 - Federally Mandated Operating Permits**

Renewal PTO C-72-0-1 (facility-wide permit):

Conditions #5, 8 – 21, 26, and 36 – 40 from the current PTO were included as Conditions #5, 8 – 21, 26, and 36 – 40 on the renewal PTO.

Condition #41 on the current PTO was revised and included as condition #41 on the renewal PTO.

Renewal PTO C-72-1-4:

There is no change to the existing Rule 2520 condition #20.

Renewal PTO C-72-3-9

There is no change to the existing Rule 2520 condition #42.

Renewal PTO C-72-6-2:

There are no Rule 2520-based conditions on this permit.

Renewal PTO C-72-7-9:

There are no changes to the existing Rule 2520 conditions #9, 10, 11, and 46 through 50.

Renewal PTO C-72-8-5:

There are no changes to the existing Rule 2520 conditions #17, 27 through 30, 63, 64, and 65.

Renewal PTO C-72-9-2:

There is no change to the existing Rule 2520 condition #11.

**F. District Rule 4101 - Visible Emissions**

The latest version of District Rule 4101 was approved by EPA for adoption into the SIP effective October 11, 2005 (see August 11, 2005 Federal Register Part 70, page 46770-46772).

Renewal PTO C-72-0-1:

Condition #22 on the current PTO will be included as condition #22 on the renewal PTO with the following revisions:

The rule reference date was changed from 11/15/01 to 2/17/05 and superseded County Rules 401 for all eight counties within SJVUAPCD were removed from the rule reference since Rule 4101 has been adopted into the SIP.

**G. District Rule 4104 - Reduction of Animal Matter**

This rule has not been modified since December 17, 1992; therefore, there are no changes to the rule that require discussion.

Renewal PTO C-76-3-9

The current PTO C-72-3-10 has two virtually identical conditions requiring continuous monitoring of the thermal oxidizer temperature: #10 and 45. The conditions will be combined as condition #9 on the Renewal PTO. There are no other changes to any of the Rule 4104-based conditions.

**H. District Rule 4306, Boilers, Steam Generators, and Process Heaters – Phase 3**

The purpose of this rule is to limit emissions of oxides of nitrogen (NO<sub>x</sub>) and carbon monoxide (CO) from boilers, steam generators, and process heaters.

This rule applies to any gaseous fuel or liquid fuel fired boiler, steam generator, or process heater with a total rated heat input greater than 5 million Btu per hour.

**Section 5.1, NO<sub>x</sub> and CO Emissions Limits**

Section 5.1.1 requires that except for units subject to Sections 5.2, NO<sub>x</sub> and carbon monoxide (CO) emissions shall not exceed the limits specified in the following table.

<b>Rule 4306 Emissions Limits</b>				
<b>Category</b>	<b>Operated on gaseous fuel</b>		<b>Operated on liquid fuel</b>	
	<b>NO<sub>x</sub> Limit</b>	<b>CO Limit</b>	<b>NO<sub>x</sub> Limit</b>	<b>CO Limit</b>
B. Units with a rated heat input greater than 20.0 MMBtu/hr, except for categories C, D, E, F, G, H, and I units	9 ppmv or 0.011 lb/MMBtu	400 ppmv	40 ppmv or 0.052 lb/MMBtu	400 ppmv

Renewal PTO C-72-7-9

Conditions #16 and 17 meet the NO<sub>x</sub> and CO limits of this rule.

Renewal PTO C-72-8-5

Conditions #18 and 19 meet the NO<sub>x</sub> and CO limits of this rule.

**Section 5.2, Low Use**

Since neither C-72-7 nor C-72-8 qualifies as "low use," the requirements of this section do not apply.

**Section 5.3, Startup and Shutdown Provisions**

Since Baker Commodities has not proposed startup or shutdown provisions as allowed by this rule for either C-72-7 or C-72-8, the requirements of this section do not apply.

#### **Section 5.4, Monitoring Provisions**

Section 5.4.2 requires that permit units subject to District Rule 4306, Section 5.1 emissions limits shall either install and maintain Continuous Emission Monitoring (CEM) equipment for NO<sub>x</sub>, CO and O<sub>2</sub>, or install and maintain APCO-approved alternate monitoring.

##### **Renewal PTO C-72-7-9**

Conditions #20 through 23 ensure compliance with emissions monitoring provisions of this rule.

##### **Renewal PTO C-72-8-5**

Conditions #50 through 53 ensure compliance with emissions monitoring provisions of this rule.

#### **Section 5.5, Compliance Determination**

Section 5.5.1 allows the operator to comply with either the applicable heat input (lb/MMBtu) emission limits or the concentration (ppmv) emission limits specified in Section 5.1. The emission limits selected to demonstrate compliance shall be specified in the source test proposal pursuant to Rule 1081 (Source Sampling).

##### **Renewal PTO C-72-7-9**

Condition #26 ensures compliance with this section.

##### **Renewal PTO C-72-8-5**

Condition #34 ensures compliance with this section.

Section 5.5.2 requires that all emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0.

Section 5.5.4 requires that for emissions monitoring pursuant to Sections 5.4.2, 5.4.2.1, and 6.3.1 using a portable NO<sub>x</sub> analyzer as part of an APCO approved Alternate Emissions Monitoring System, emission readings shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15-consecutive-minute sample reading or by taking at least five (5) readings evenly spaced out over the 15-consecutive-minute period.

Renewal PTO C-72-7-9

Condition #22 ensures compliance with Sections 5.5.2 and 5.5.4.

Renewal PTO C-72-8-5

Condition #52 ensures compliance with Sections 5.5.2 and 5.5.4.

Section 5.5.5 requires that for emissions source testing, the arithmetic average of three (3) 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit, the test cannot be used to demonstrate compliance with an applicable limit.

Renewal PTO C-72-7-9

Condition #27 ensures compliance with Section 5.5.5.

Renewal PTO C-72-8-5

Condition #35 ensures compliance with Section 5.5.5.

**Section 6.1, Recordkeeping**

Section 6.1 requires that the records required by Sections 6.1.1 through 6.1.3 to be maintained for five calendar years and to be made available to the APCO upon request.

Renewal PTO C-72-7-9

Condition #45 ensures compliance with Section 5.5.5.

Renewal PTO C-72-8-5

Condition #62 ensures compliance with Section 5.5.5.

**Section 6.2, Test Methods**

Section 6.2 identifies the District-approved source test methods.

Renewal PTO C-72-7-9

Conditions #33, 36, and 37 ensure compliance with Section 5.5.5.

Renewal PTO C-72-8-5

Conditions #41, 43, and 44 ensure compliance with Section 5.5.5.

### **Section 6.3, Compliance Testing**

Section 6.3.1 requires source testing to determine compliance with NO<sub>x</sub> and CO emission limits not less than once every 12 months. Upon demonstrating compliance on two consecutive compliance source tests, the source test may be deferred for up to 36 months.

#### Renewal PTO C-72-7-9

Conditions #31 and 32 ensure compliance with Section 6.3.1.

#### Renewal PTO C-72-8-5

Conditions #37, 38, and 39 ensure compliance with Section 6.3.1.

### **Section 8.0, Calculations**

Section 8.1 states that all ppmv emission limits (specified in Section 5.1) are referenced at dry stack gas conditions and 3.00 percent by volume stack gas oxygen. Measured emission concentrations shall be corrected to 3.00 percent oxygen. Section 8.2 requires all lb-NO<sub>x</sub>/MMBtu emission rates to be calculated as in terms of the higher heating value (hhv) of the fuel.

#### Renewal PTO C-72-7-9

Condition #34 ensures compliance with Sections 8.1 and 8.2.

#### Renewal PTO C-72-8-5

Condition #42 ensures compliance with Sections 8.1 and 8.2.

## **I. District Rule 4601 - Architectural Coatings**

The purpose of this rule is to limit VOC emissions from architectural coatings. This rule specifies architectural coatings storage, cleanup, and labeling requirements.

The latest version of District Rule 4601 (amended 12/17/09) has not been SIP approved. Attachment E contains the streamlining of the SIP approved District Rule 4601 (10/31/01) to the current District Rule 4601 to show the current rule is as stringent if not more than the SIP approved version.

#### Renewal PTO C-72-0-1:

Conditions #23, 24, and 25 will ensure compliance with the latest version of this rule.

**J. District Rule 4621 – Gasoline Transfer into Stationary Storage Containers, Delivery Vessels, and Bulk Plants**

The purpose of this rule is to limit VOC emissions from stationary storage containers, delivery vessels, and bulk plants and to provide the administrative requirements for determining compliance with this rule.

This rule applies to gasoline delivery vessels, tanks with capacity greater than 250 gallons, but not exceeding 19,800 gallons, located at gasoline bulk plants, and other stationary gasoline storage tanks with capacity greater than 250 gallons except for tanks subject to the requirements of Rule 4623 (Storage of Organic Liquids) Section 5.1 to 5.3.

This rule applies to C-72-6.

C-72-6 is an aboveground gasoline storage tank served by a CARB certified Phase I vapor recovery system (Executive Order G-70-140-A). The storage tank was originally installed in 1985 according to District records. There are two existing conditions that reference Rule 4621 on current Title V PTO C-72-6-1; however, these will be replaced with standard Rule 4621-based conditions, which include requirements for performing maintenance to ensure leak-free operation, and periodic testing. The existing requirement in condition #4 to have the pressure-vacuum valve set to within 10% of the maximum working pressure was removed. In lieu of specifying the pressure-vacuum settings, the District requires the permittee to follow the Executive Order by reference (condition #1).

Rule Requirements:

Section 5.1 states "loading equipment and vapor collection equipment shall be installed, maintained, and operated such that it is leak-free, with no excess organic liquid drainage at disconnect."

Section 3.19.2 defines a leak as the dripping of VOC-containing liquid at a rate of more than three (3) drops per minute, or the detection of any gaseous or vapor emissions with a concentration or total organic compound greater than 10,000 ppmv, as methane, above background when measured in accordance with [EPA Test Method 21].

Therefore, the following permit conditions will be placed on the ATC to ensure compliance with these requirements:

Conditions #4 and 5 on Renewal PTO C-72-6-2 will ensure compliance with Section 5.1.

Section 5.2.1 states "no person shall transfer, or permit the transfer, of gasoline from any delivery vessel into any stationary storage container subject to the

requirements of this rule unless such container is equipped with an ARB certified permanent submerged fill pipe and utilizes an ARB certified Phase I vapor recovery system that is maintained and operated according to manufacturer specifications and the applicable ARB Executive Order."

Since the facility has installed an ARB certified Phase I vapor recovery system, requirements of this section are satisfied and compliance is expected.

Condition #1 on Renewal PTO C-72-6-2 will ensure compliance with Section 5.2.1.

Section 5.4.1 states "all aboveground storage containers shall be constructed and maintained in a leak-free condition."

Condition #3 on Renewal PTO C-72-6-2 will ensure compliance with Section 5.4.1.

Section 5.4.5 states "operators of an aboveground storage container not located at a bulk plant shall conduct and pass the performance test specified in Sections 6.4.9 to determine compliance at least once every 36 months, (no more than 30 days before or after the required performance test date) unless otherwise required under ARB Executive Order."

Conditions #9 and 10 on Renewal PTO C-72-6-2 will ensure compliance with Section 5.4.5.

Section 5.5 states "All Phase I vapor recovery systems shall be inspected according to the frequency specified in Table 1. The person conducting the inspections shall, at a minimum, verify that the fill caps and vapor caps are not missing, damaged, or loose, that the fill cap gasket and vapor cap gaskets are not missing or damaged, that the fill adapter and vapor adapter are securely attached to the risers, that, where applicable, the spring-loaded submerged fill tube seals properly against the coaxial tubing, and the dry break (poppet-valve) is not missing or damaged and that the submerged fill tube is not missing or damaged."

Conditions #7 and 8 on Renewal PTO C-72-6-2 will ensure compliance with Section 5. 5.

Section 5.7.2 states "no person shall operate, or allow the operation of a delivery vessel unless valid State of California decals which attest to the vapor integrity of the container are displayed."

Conditions #6 on Renewal PTO C-72-6-2 will ensure compliance with Section 5. 7.2.

Section 6.1.4 states "all records required to demonstrate compliance with the requirements of this rule shall be retained on the premises for a minimum of five years and made available on site during normal business hours to the APCO, ARB, or EPA, and submitted to the APCO, ARB, or EPA upon request."

Conditions #15 and 16 on Renewal PTO C-72-6-2 will ensure compliance with Section 6.1.4.

Section 6.2.3 states "Operators shall notify the District at least seven days prior to any performance testing." Section 6.2.4 states "Operators shall submit all performance test results to the District within 30 days of test completion."

Condition #14 on Renewal PTO C-72-6-2 will ensure compliance with Sections 6.2.3 and 6.2.4.

Section 6.3.1 states "on and after June 20, 2008, installation and maintenance contractors shall be certified by the ICC for Vapor Recovery System Installation and Repair (VI) and make available onsite proof of ICC certification for VI, and have and make available on site proof of any and all certifications required by the Executive Order and installation and operation manual in order to install or maintain specific systems, or work under the direct and personal supervision of an individual physically present at the work site who possesses and makes available onsite a current certificate from the ICC, indicating he or she has passed the VI exam and all certifications required by the applicable Executive Order.

Section 6.3.2 states "All ICC certifications shall be renewed every 24 months by passing the appropriate exam specific to the certification being sought."

Section 6.3.3 states "Effective on and after March 21, 2008, Gasoline Dispensing Facility Testers wishing to conduct vapor recovery system testing and repair at facilities located within the District, shall be in full compliance with District Rule 1177 (Gasoline Dispensing Facility Tester Certification)."

Conditions #11, 12, and 13 on Renewal PTO C-72-6-2 will ensure compliance with Sections 6.3.2 and 6.3.3.

**K. Rule 4622 – Gasoline Transfer into Stationary Storage Containers, Delivery Vessels, and Bulk Plants**

The purpose of this rule is to limit emissions of gasoline vapors from the transfer of gasoline into motor vehicle fuel tanks. This rule applies to any gasoline storage and dispensing facility at which gasoline is transferred into motor vehicle fuel tanks except as provided in Section 4.0.

This rule applies to C-72-6. However, C-72-6 is "Phase II Exempt" by virtue of throughput limits in Section 4.1. There are three existing conditions (#1, 2, and 3) on the current Title V PTO C-72-6-1 that reference Rule 4622; however, these conditions will be replaced with conditions #2 and 15 on Renewal PTO C-76-6-2 to reflect the latest standard language used. There is no substantive change to the requirements.

Rule Requirements:

Section 4.1 states that except for the provisions of Section 6.1.1 and 6.1.2, requirements of this rule shall not apply to the transfer of gasoline into motor vehicle fuel tanks from any existing storage container, as defined in Section 3.10, with an aggregate dispensing operation throughput of:

4.1.1 less than or equal to 24,000 gallons per calendar year; and

4.1.2 less than or equal to 10,000 gallons in any consecutive 30-day period.

Condition #2 on Renewal PTO C-72-6-2 will ensure compliance with Section 4.1.

Section 6.1 lists the recordkeeping and reporting requirements for exempt operations.

Section 6.1.1 requires gasoline dispensing operations that are exempt under Section 4.1 shall to maintain gasoline throughput records which will allow the gasoline throughput for any 30-day period to be continuously determined. These records shall be maintained on the premises as long as exempt status is claimed.

Section 6.1.2 requires any gasoline dispensing operation previously exempt under Section 4.1 whose gasoline throughput exceeds the exemption levels in Sections 4.1.1 and 4.1.2 to notify the District within 30 days of the date of exceeding the exemption levels.

Conditions #2 and 15 on Renewal PTO C-72-6-2 will ensure compliance with Sections 6.1.1 and 6.1.2.

### **SJVUAPCD Regulation VIII - Fugitive Dust (PM10)**

The following Regulation VIII requirements will be addressed on the facility-wide draft renewal PTO C-72-0-1:

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

The purpose of Regulation VIII (Fugitive PM10 Prohibitions) is to reduce ambient concentrations of fine particulate matter (PM10) by requiring actions to prevent, reduce or mitigate anthropogenic fugitive dust emissions. The provisions of this rule are applicable to specified outdoor fugitive dust sources.

Conditions #29 - 33 on the current PTO will be included as conditions #29 – 33 on Renewal PTO C-72-0-1. The only revision to these conditions will be that they will reference “8/19/04” as the rule amended date instead of “11/15/01.”

Condition #34 on the current PTO was revised to reflect the 9/16/04 amendments to Rule 8071.

#### **M. District Rule 8021 - Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities**

The purpose of this rule is to limit fugitive dust emissions from construction, demolition, excavation, extraction, and other earthmoving activities. This rule applies to any construction, demolition, excavation, extraction, and other earthmoving activities, including, but not limited to, land clearing, grubbing, scraping, travel on site, and travel on access roads to and from the site.

Section 5.0 requires that no person shall perform any construction, demolition, excavation, extraction, or other earthmoving activities unless the appropriate requirements in sections 5.1 and 5.2 are sufficiently implemented to limit VDE to 20% opacity.

Compliance with the provisions of this rule is ensured by condition #29 on Renewal PTO C-72-0-1.

#### **N. District Rule 8031 - Bulk Materials**

The purpose of this rule is to limit fugitive dust emissions from the outdoor handling, storage, and transport of bulk materials.

This rule applies to the outdoor handling, storage, and transport of any bulk material.

Section 5.0 requires that no person shall perform any outdoor handling, storage, and transport of bulk materials unless the appropriate requirements in Table 8031-1 of this rule are sufficiently implemented to limit VDE to 20% opacity or to comply with the conditions for a stabilized surface as defined in Rule 8011.

Compliance with the provisions of this rule is ensured by condition #30 on Renewal PTO C-72-0-1.

**O. District Rule 8041 - Carryout and Trackout**

The purpose of this rule is to limit fugitive dust emissions from carryout and trackout.

This rule applies to all sites that are subject to Rules 8021 (Construction, Demolition, Excavation, Extraction, and other Earthmoving Activities), 8031 (Bulk Materials), and 8071 (Unpaved Vehicle and Equipment Traffic Areas) where carryout or trackout has occurred or may occur.

Section 5.0 requires that an owner/operator shall sufficiently prevent or cleanup carryout and trackout as specified in sections 5.1 through 5.8. The use of blower devices, or dry rotary brushes or brooms, for removal of carryout and trackout on public roads is expressly prohibited. The removal of carryout and trackout from paved public roads does not exempt an owner/operator from obtaining state or local agency permits which may be required for the cleanup of mud and dirt on paved public roads.

Compliance with the provisions of this rule is ensured by condition #31 on Renewal PTO C-72-0-1.

**P. District Rule 8051 - Open Areas**

The purpose of this rule is to limit fugitive dust emissions from open areas.

This rule applies to any open area having 3.0 acres or more of disturbed surface area, that has remained undeveloped, unoccupied, unused, or vacant for more than seven days.

Section 5.0 requires that whenever open areas are disturbed or vehicles are used in open areas, the owner/operator shall implement one or a combination of control measures indicated in Table 8051-1 to comply with the conditions of a stabilized surface at all times and to limit VDE to 20% opacity. In addition

to the requirements of this rule, a person shall comply with all other applicable requirements of Regulation VIII.

Compliance with the provisions of this rule is ensured by condition #32 on Renewal PTO C-72-0-1.

**Q. District Rule 8061 - Paved and Unpaved Roads**

The purpose of this rule is to limit fugitive dust emissions from paved and unpaved roads by implementing control measures and design criteria.

This rule applies to any new or existing public or private paved or unpaved road, road construction project, or road modification project.

Compliance with the provisions of this rule is ensured by condition #33 on Renewal PTO C-72-0-1.

**R. District Rule 8071 - Unpaved Vehicle/Equipment Traffic Area**

The purpose of this rule is to limit fugitive dust emissions from unpaved vehicle and equipment traffic areas by implementing control measures and design criteria.

This rule applies to any unpaved vehicle/equipment traffic area.

Condition #34 was revised to reflect the latest amendment to this rule #34 Renewal PTO C-72-0-1.

**40 CFR Part 60 - Subpart Dc—Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units**

**§ 60.40c Applicability and delegation of authority**

(a) Except as provided in paragraphs (d), (e), (f), and (g) of this section, the affected facility to which this subpart applies is each steam generating unit for which construction, modification,<sup>2</sup> or reconstruction is commenced after June 9, 1989 and that has a maximum design heat input capacity of 29 megawatts (MW) (100 million British thermal units per hour (MMBtu/hr)) or less, but greater than or equal to 2.9 MW (10 MMBtu/hr).

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<sup>2</sup> NSPS Subpart A defines "modification" as "any physical change in, or change in the method of operation of, an existing facility which increases the amount of any air pollutant (to which a standard applies) emitted into the atmosphere by that facility or which results in the emission of any air pollutant (to which a standard applies) into the atmosphere not previously emitted."

Both boilers meet the applicability criteria and none of the exceptions or exemptions listed in (d), (e), (f), and (g) paragraphs apply; therefore, both boilers C-72-7 and C-72-8 are subject to this subpart.

Subpart Dc has emission standards for SO<sub>2</sub> and PM.

**§ 60.42c Standard for sulfur dioxide (SO<sub>2</sub>)**

Paragraphs (a) through (c) concern units that fire on coal. Baker Commodities does not have any coal-fired boilers; therefore, paragraphs (a) through (c) do not apply. The applicable paragraph to units that fire on fuel oil is

(d) On and after the date on which the initial performance test is completed or required to be completed under §60.8, whichever date comes first, no owner or operator of an affected facility that combusts oil shall cause to be discharged into the atmosphere from that affected facility any gases that contain SO<sub>2</sub> in excess of 215 ng/J (0.50 lb/MMBtu) heat input; or, as an alternative, no owner or operator of an affected facility that combusts oil shall combust oil in the affected facility that contains greater than 0.5 weight percent sulfur. The percent reduction requirements are not applicable to affected facilities under this paragraph.

Renewal PTO C-72-7-9:

C-72-7 is not authorized to fire on fuel oil, so paragraph (d) does not apply.

Renewal PTO C-72-8-5:

C-72-8 is authorized to fire on fuel oil, so paragraph (d) does apply.

Conditions #6, 10, 27, 28, and 29 will ensure compliance with 40 CFR 60.42c(d).

(h) For affected facilities listed under paragraphs (h)(1), (2), or (3) of this section, compliance with the emission limits or fuel oil sulfur limits under this section may be determined based on a certification from the fuel supplier, as described under §60.48c(f), as applicable.

(1) Distillate oil-fired affected facilities with heat input capacities between 2.9 and 29 MW (10 and 100 MMBtu/hr).

Renewal PTO C-72-8-5:

C-72-8 falls into the category described by paragraph (h)(1); therefore, compliance with the SO<sub>2</sub> standard may be demonstrated by certification from the fuel supplier.

Condition #29 will ensure compliance with 40 CFR 60.42c(h).

**§ 60.43c Standard for particulate matter (PM)**

Paragraphs (a) and (b) apply to coal and wood fired boilers. Neither C-72-7 nor C-72-8 use wood or coal, so paragraphs (a) and (b) are not applicable.

(c) On and after the date on which the initial performance test is completed or required to be completed under §60.8, whichever date comes first, no owner or operator of an affected facility that can combust coal, wood, or oil and has a heat input capacity of 8.7 MW (30 MMBtu/hr) or greater shall cause to be discharged into the atmosphere from that affected facility any gases that exhibit greater than 20 percent opacity (6-minute average), except for one 6-minute period per hour of not more than 27 percent opacity. Owners and operators of an affected facility that elect to install, calibrate, maintain, and operate a continuous emissions monitoring system (CEMS) for measuring PM emissions according to the requirements of this subpart and are subject to a federally enforceable PM limit of 0.030 lb/MMBtu or less are exempt from the opacity standard specified in this paragraph.

(d) The PM and opacity standards under this section apply at all times, except during periods of startup, shutdown, or malfunction.

(e)(1) On and after the date on which the initial performance test is completed or is required to be completed under §60.8, whichever date comes first, no owner or operator of an affected facility that commences construction, reconstruction, or modification after February 28, 2005, and that combusts coal, oil, wood, a mixture of these fuels, or a mixture of these fuels with any other fuels and has a heat input capacity of 8.7 MW (30 MMBtu/hr) or greater shall cause to be discharged into the atmosphere from that affected facility any gases that contain PM in excess of 13 ng/J (0.030 lb/MMBtu) heat input, except as provided in paragraphs (e)(2), (e)(3), and (e)(4) of this section.

(2) As an alternative to meeting the requirements of paragraph (e)(1) of this section, the owner or operator of an affected facility for which modification commenced after February 28, 2005, may elect to meet the requirements of this paragraph. On and after the date on which the initial performance test is completed or required to be completed under §60.8, whichever date comes first, no owner or operator of an affected facility that commences modification after February 28, 2005 shall cause to be discharged into the atmosphere from that affected facility any gases that contain PM in excess of both:

(i) 22 ng/J (0.051 lb/MMBtu) heat input derived from the combustion of coal, oil, wood, a mixture of these fuels, or a mixture of these fuels with any other fuels; and

(ii) 0.2 percent of the combustion concentration (99.8 percent reduction) when combusting coal, oil, wood, a mixture of these fuels, or a mixture of these fuels with any other fuels.

(3) On and after the date on which the initial performance test is completed or is required to be completed under §60.8, whichever date comes first, no owner or operator of an affected facility that commences modification after February 28, 2005, and that combusts over 30 percent wood (by heat input) on an annual basis and has a heat input capacity of 8.7 MW (30 MMBtu/hr) or greater shall cause to be discharged into the atmosphere from that affected facility any gases that contain PM in excess of 43 ng/J (0.10 lb/MMBtu) heat input.

(4) On and after the date on which the initial performance test is completed or is required to be completed under §60.8, whichever date comes first, an owner or operator of an affected facility that commences construction, reconstruction, or modification after February 28, 2005, and that combusts only oil that contains no more than 0.50 weight percent sulfur or a mixture of 0.50 weight percent sulfur oil with other fuels not subject to a PM standard under §60.43c and not using a post-combustion technology (except a wet scrubber) to reduce PM or SO<sub>2</sub> emissions is not subject to the PM limit in this section.

Renewal PTO C-72-7-9:

C-72-7 is not authorized to fire on fuel oil, so paragraphs (c), (d), and (e) do not apply.

Renewal PTO C-72-8-5:

C-72-8 commenced construction after February 28, 2005, and is authorized to fire on fuel oil. The fuel oil is required by permit condition #10 to have a sulfur content not more than 0.05% by weight; therefore, per paragraph (e)(4) above, C-72-8 is not subject to the PM standard in §60.43c.

Condition #26 from the current PTO is extraneous and will not be carried over to the renewal PTO.

**§ 60.44c Compliance and performance test methods and procedures for sulfur dioxide (SO<sub>2</sub>)**

(g) For oil-fired affected facilities where the owner or operator seeks to demonstrate compliance with the fuel oil sulfur limits under §60.42c based on shipment fuel sampling, the initial performance test shall consist of sampling and analyzing the oil in the initial tank of oil to be fired in the steam generating unit to demonstrate that the oil contains 0.5 weight percent sulfur or less. Thereafter, the owner or operator of the affected facility shall sample the oil in the fuel tank after each new shipment of oil is received, as described under §60.46c(d)(2).

(h) For affected facilities subject to §60.42c(h)(1), (2), or (3) where the owner or operator seeks to demonstrate compliance with the SO<sub>2</sub> standards based on fuel

supplier certification, the performance test shall consist of the certification from the fuel supplier, as described in §60.48c(f), as applicable.

Renewal PTO C-72-7-9:

C-72-7 is not subject to a sulfur dioxide standard.

Renewal PTO C-72-8-5:

C-72-8 is authorized to fire on fuel oil, so paragraph (d) does apply.

Conditions #27, 28, and 29 will ensure compliance with 40 CFR 60.42c(g) and (h).

**§ 60.45c Compliance and performance test methods and procedures for particulate matter (PM)**

There are no PM standards in this subpart that apply to either C-72-7 or C-72-8; therefore, this section is not applicable.

**§ 60.46c Emission monitoring for sulfur dioxide (SO<sub>2</sub>)**

C-72-7 is not subject to the SO<sub>2</sub> standard for this subpart, so this section does not apply to C-72-7.

Paragraphs (a), (b), (c) and (f) apply to units with CEMS for SO<sub>2</sub>. C-72-8 is not equipped with a CEMS for SO<sub>2</sub>; therefore, these sections do not apply.

Paragraphs (d) and (e) apply to C-72-8.

Paragraph (d) specifies the fuel sulfur sampling protocol, sampling frequency and test methods.

Renewal PTO C-72-8-5:

The District has performed a side by side comparison of District requirements and Subpart Dc requirements for SO<sub>2</sub> as part of its Title V Boiler Template (see Attachment F). The conditions approved for use on the template have been in use on the current PTO C-72-8-1 and accepted by the District and EPA as meeting the fuel sulfur testing requirements of Subpart Dc.

Conditions #27 and 28 will ensure compliance with 40 CFR 60.46c(d).

Paragraph (e) allows for supplier certification of the fuel oil sulfur content.

Condition #29 will ensure compliance with 40 CFR 60.46c(e).

**§ 60.47c Emission monitoring for particulate matter**

There are no PM standards in this subpart that apply to either C-72-7 or C-72-8; therefore, this section is not applicable.

**§ 60.48c Reporting and recordkeeping requirements**

The District has performed a side by side comparison of District requirements and Subpart Dc requirements for SO<sub>2</sub> as part of its Title V Boiler Template (see Attachment F). The conditions approved for use on the template have been in use on the current PTO C-72-8-1 and accepted by the District and EPA as meeting the record reporting requirements of Subpart Dc.

Renewal PTO C-72-8-5:

Condition #29 will ensure compliance with 40 CFR 60.48c(f).

**S. 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos**

These regulations apply to demolition or renovation activity, as defined in 40 CFR 61.141. 40 CFR Section 61.150 of this subpart was amended September 18, 2003. Condition #35 of C-72-0-1 ensures compliance with the requirements of this subpart.

**T. 40 CFR Part 64- Compliance Assurance Monitoring (CAM)**

The CAM rule requires facilities to monitor the performance of their emission control equipment.

CAM Section 64.1 Definitions

This section defines the key terms in the CAM rule.

CAM Section 64.2(a) General applicability

Except for certain exemptions enumerated in subpart (b), CAM requirements apply to a pollutant specific emissions unit<sup>3</sup> at a Major Source if the unit satisfies all of the following criteria:

- 1) the unit must have an emission limit for the pollutant; and
- 2) the unit must have add-on controls for the pollutant that enable it to achieve the emission limit; and

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<sup>3</sup> Pollutant-specific emissions unit means an emissions unit considered separately with respect to each regulated air pollutant (Section 64.1).

3) the unit must have a pre-control potential to emit for that pollutant greater than the Major Source threshold.

**CAM Applicability Determinations:**

**Renewal PTO C-72-1-4:**

There are no emission limits on this permit; therefore, CAM is not applicable to C-72-1.

**Renewal PTO C-72-3-9:**

The only pollutant that has an emission limit on this permit and has a uncontrolled potential to emit above its major source threshold is NOx. Although the thermal oxidizer listed on C-72-3-9 has a NOx emission limit, and its uncontrolled potential to emit is greater than the major source threshold for NOx (50,000 lb/yr), the thermal oxidizer does not itself have any add-on controls that enable it to meet the NOx emission limits on the permit. Therefore, CAM is not applicable to C-72-3.

**Renewal PTO C-72-6-2:**

There are no emission limits on this permit; therefore, CAM is not applicable to C-72-6.

**Renewal PTO C-72-7-9:**

The permit for C-72-7 has an emission limit for NOx, and the boiler has an add-on control in flue gas recirculation (FGR) that help it meet this limit; however, the uncontrolled potential to emit is not greater than the major source threshold for NOx (50,000 lb/year).

Based on a Memorandum issued by EPA, Roy Sims, Combustion Group, yellow grease has higher NOx emissions than natural gas, but lower NOx emissions than Fuel Oil No. 2. Since no reliable emission factor for uncontrolled NOx emissions from yellow grease were found, a conservatively high estimate can be made by using the Fuel Oil No. 2 NOx emission factor for yellow grease combustion in the following calculations. Thus, the highest uncontrolled NOx emissions would come from firing on yellow grease to maximum extent allowed by the permit (1,730,139 gallons/year) with the remainder natural gas.

Assuming that yellow grease has a heating value of 130.5 MMBtu/10<sup>3</sup> gallons at 60°F (based on source test data included in the application for project C-1010127 for Baker Commodities).

The potential annual amount of Btu given to yellow grease combustion = 1,730,139 gal yellow grease/yr x 130.5 MMBtu/10<sup>3</sup> gallons = 225,783 MMBtu/yr

The maximum annual heat input to the boiler = boiler rating x 8,760 hours/yr

The maximum annual heat input to the boiler = 39.5 MMBtu/hr x 8,760 hours/yr = 346,020 MMBtu/yr

Heat input from natural gas = Total Heat Input – Yellow Grease Heat Input

Heat input from natural gas = 346,020 MMBtu/yr - 225,783 MMBtu/yr

Heat input from natural gas = 120,237 MMBtu/yr

NOx emission factor for natural gas (uncontrolled) = 0.1 lb-NOx/MMBtu<sup>4</sup>

NOx emission factor for yellow grease (uncontrolled) = 0.14 lb-NOx/MMBtu

The uncontrolled potential to emit for the boiler =  $EF_{\text{nat gas}} \times \text{Heat Input}_{\text{nat gas}} + EF_{\text{yellow grease}} \times \text{Heat Input}_{\text{yellow grease}}$

PE (uncontrolled) = 0.1 lb-NOx/MMBtu x 120,237 MMBtu/yr + 0.14 lb-NOx/MMBtu x 225,783 MMBtu/yr

PE (uncontrolled) = 43,633 lb-NOx/year

Since the uncontrolled potential to emit for NOx is not greater than the major source threshold for NOx, CAM is not applicable to C-72-7.

Renewal PTO C-72-8-5:

The permit for C-72-8 has an emission limit for NOx, and the boiler has an add-on control in flue gas recirculation (FGR) that help it meet this limit; however, the uncontrolled potential to emit is not greater than the major source threshold for NOx (50,000 lb/year).

Based on a Memorandum issued by EPA, Roy Sims, Combustion Group, yellow grease has higher NOx emissions than natural gas, but lower NOx emissions than Fuel Oil No. 2. Since no reliable emission factor for uncontrolled NOx emissions from yellow grease were found, a conservatively high estimate can be made by using the fuel oil No. 2 NOx emission factor for yellow grease combustion in the following calculations. Thus, the highest uncontrolled NOx emissions would come from firing on yellow grease to maximum extent allowed by the permit (1,428,610 gallons/year) added to the amount of Diesel No. 2 (13,031 gallons/year) with the remainder natural gas.

<sup>4</sup> AP-42 Table 1.4-1 (7/98)

Assuming that yellow grease has a heating value of 130.5 MMBtu/10<sup>3</sup> gallons at 60°F (based on source test data included in the application for project C-1010127 for Baker Commodities).

The potential annual amount of Btu given to yellow grease combustion = 1,428,610 gal yellow grease/yr x 130.5 MMBtu/10<sup>3</sup> gallons = 186,433 MMBtu/yr

The potential annual amount of Btu given to diesel combustion = 13,031 gal diesel/yr x 137 MMBtu/10<sup>3</sup> gallons = 1,785 MMBtu/yr

The maximum annual heat input to the boiler = boiler rating x 8,760 hours/yr

The maximum annual heat input to the boiler = 37.8 MMBtu/hr x 8,760 hours/yr = 331,128 MMBtu/yr

Heat input from natural gas = Total Heat Input – Yellow Grease Heat Input– Diesel Heat Input

Heat input from natural gas = 331,128 MMBtu/yr – 186,433 MMBtu/yr – 1,785 MMBtu/yr

Heat input from natural gas = 142,910 MMBtu/yr

NOx emission factor for natural gas (uncontrolled) = 0.1 lb-NOx/MMBtu<sup>5</sup>

NOx emission factor for yellow grease and diesel (uncontrolled) = 0.14 lb-NOx/MMBtu

The uncontrolled potential to emit for the boiler =  $EF_{nat\ gas} \times Heat\ Input_{nat\ gas} + EF_{yellow\ grease} \times Heat\ Input_{yellow\ grease} + EF_{diesel} \times Heat\ Input_{diesel}$

PE (uncontrolled) = 0.1 lb-NOx/MMBtu x 142,910 MMBtu/yr + 0.14 lb-NOx/MMBtu x 186,433 MMBtu/yr + 0.14 lb-NOx/MMBtu x 1,785 MMBtu/yr

PE (uncontrolled) = 40,642 lb-NOx/year

Since the uncontrolled potential to emit for NOx is not greater than the major source threshold for NOx, CAM is not applicable to C-72-8.

Renewal PTO C-72-9-2:

The only emission limit on the permit is for PM10. There are no add-on control devices for PM10; therefore, CAM is not applicable to C-72-9.

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<sup>5</sup> AP-42 Table 1.4-1 (7/98)

**U. 40 CFR Part 82, Subparts B and F, Stratospheric Ozone**

These regulations apply to the servicing of motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC). Sections of this regulation were amended in 2004 and 2008. Conditions #27 and 28 of C-72-0-1 ensure compliance with the requirements of this subpart.

**IX. PERMIT SHIELD**

A permit shield legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Title V Permit. Compliance with the terms and conditions of the Operating Permit is considered compliance with all applicable requirements upon which those conditions are based, including those that have been subsumed.

**A. Permit Shields from Model General Permit Templates**

The applicant has not requested the use of any model templates.

**B. Obsolete Permit Shields from Existing Permit Requirements**

There are no obsolete permit shields being removed in this renewal.

**X. PERMIT CONDITIONS**

See Attachment A - Draft Renewed Title V Operating Permit.

**XI. ATTACHMENTS**

- A. Draft Renewal Title V Operating Permit
- B. Previous Title V Operating Permit
- C. Detailed Facility List
- D. Authority to Construct Permits C-72-3-6, '-7-6, and '-8-3
- E. District Rule 4601 Stringency Analysis
- F. SO<sub>2</sub> Testing Requirements from SJVUAPCD Title V Boiler Template SJV-BSG-7-0

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# ATTACHMENT A

Draft Renewed Title V Operating Permit

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# San Joaquin Valley Air Pollution Control District

FACILITY: C-72-0-1

EXPIRATION DATE: 06/30/2009

## FACILITY-WIDE REQUIREMENTS

1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1 and Fresno County Rule 110] Federally Enforceable Through Title V Permit
2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0 and Fresno County Rule 110] Federally Enforceable Through Title V Permit
3. {2287} The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. {2289} The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.12.1] Federally Enforceable Through Title V Permit
6. {2290} A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. {2291} Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. {2292} The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
9. {2293} The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name: BAKER COMMODITIES, INC  
Location: 16801 W JENSEN AVE, KERMAN, CA 93830  
C-72-0-1: Apr 29 2010 4:50PM - CLERICOB

10. {2294} The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. {2295} Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. {2296} If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
13. {2297} It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. {2298} The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. {2299} The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. {2300} The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. {2301} The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. {2302} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. {2303} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. {2304} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. {2305} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit
22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (2/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

23. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in the Table of Standards of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. All VOC-containing materials for architectural coatings subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. {2310} With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. {2311} If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. {2312} If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR 82, Subpart B. [40 CFR 82, Subpart B] Federally Enforceable Through Title V Permit
29. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/04) or Rule 8011 (8/19/04). [District Rule 8021 and 8011] Federally Enforceable Through Title V Permit
30. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/04) or Rule 8011 (8/19/04). [District Rule 8031 and 8011] Federally Enforceable Through Title V Permit
31. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/04) or Rule 8011 (8/19/04). [District Rule 8041 and 8011] Federally Enforceable Through Title V Permit
32. Whenever open areas are disturbed or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/04) or Rule 8011 (8/19/04). [District Rule 8051 and 8011] Federally Enforceable Through Title V Permit
33. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/04) or Rule 8011 (8/19/04). [District Rule 8061 and Rule 8011] Federally Enforceable Through Title V Permit
34. Any unpaved vehicle/equipment traffic area that anticipates more than 50 or more Average Annual Daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment traffic area that anticipates 150 vehicle daily trips (VDT), or 150 VDT that are utilized intermittently for a period of 30 days or less during the calendar year shall comply with the requirements of Section 5.1.2 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/04) or Rule 8011 (8/19/04). [District Rule 8071 and Rule 8011]
35. {2319} Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit

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

36. {2320} The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. {2321} The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. {2322} When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Fresno County Rules 110 and 401. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601, sections 5.1, 5.2, 5.3, and 5.8 (12/17/09); 8021 (8/19/04); 8031 (8/19/04); 8041 (8/19/04); 8051 (8/19/04); 8061 (8/19/04); and 8071 (9/16/04). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin December 1 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit
42. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

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

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# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-72-1-4

EXPIRATION DATE: 06/30/2009

## EQUIPMENT DESCRIPTION:

ANIMAL RENDERING OPERATION INCLUDING A RAW MATERIAL RECEIVING OPERATION EQUIPPED WITH ONE (1) 195' X 175' OUTDOOR RAW MATERIAL UNLOADING CONCRETE SLAB, ONE (1) PRE-BREAKER, ONE RAW MATERIAL CONVEYANCE SCREW SYSTEM, ONE (1) 3,500 LB CAPACITY FEED HOPPER SERVING COOKERS #2 AND #3, AND A PERMIT EXEMPT WASTE WATER LAGOON SYSTEM (DAILY EMISSIONS LESS THAN 2 LBS VOC/DAY)

## PERMIT UNIT REQUIREMENTS

1. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
3. All equipment shall be maintained and operated according to the specifications and plans contained in the permit application except as otherwise specified herein. [District Rule 2201] Federally Enforceable Through Title V Permit
4. All equipment or systems installed or used to achieve compliance with the terms and conditions of this permit shall be maintained in good working order and be operated as efficiently as possible to minimize air pollution emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The Air Pollution Control District shall be immediately notified of any breakdown or malfunction that reduces or disrupts the normal processing of odors required by this permit. [District Rule 4102]
6. The District shall have authority to investigate possible odors alleged to originate from the facility and to make a determination of whether or not a nuisance exists, either in response to a complaint or on its own initiative. [District Rules 1070 and 4102] Federally Enforceable Through Title V Permit
7. The APCO or any authorized representative shall have access to inspect any equipment, operation, records, method required in this permit, to sample emissions from the source or require samples to be taken, or perform any other actions to assure compliance with the requirements of this permit and all District rules and regulations. [District Rule 1070] Federally Enforceable Through Title V Permit
8. The premises of the plant shall be kept clean and free from spillage of raw or finished materials, refuse, and standing pools of water which may present a nuisance condition. All raw material spills shall be cleaned up immediately. [District Rule 4102]
9. Delivery trucks shall be unloaded within 2 hours of entering the property. [District Rule 4102]
10. No storage of raw materials outside of the 195' x 175' unloading pit slab area is permitted. [District NSR Rule and Rule 4102] Federally Enforceable Through Title V Permit
11. Trucks waiting their turn to unload within the 2 hour unload time limitation are not considered storage outside of the 195' x 175' pit slab area. [District Rule 4102]
12. All trucks and truck tires delivering raw material shall be washed clean of raw material and raw material residue prior to exiting the facility premises in order to minimize trackout of raw material or raw material residue. [District Rule 4102]

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

13. All raw material trucks shall be maintained in condition to prevent leakage of any solid or liquid material. [District Rule 4102]
14. The rendering plant shall not be operated unless the odor control system is operating and in full use. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Total facility raw material process rate shall not exceed 1,392,000 pounds (696 tons) per day or 331,128,000 pounds (165,564 tons) per year. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
16. Except during periods of equipment breakdown as determined by the District under Rule 1100, all material received shall be processed within 24 hours of receipt. Raw material shall be monitored to ensure that processing is performed within this time limit using feedstock records and plant output records. [District Rules 1100 and 4102]
17. If raw material cannot be processed within 24 hours of receipt, raw material shall be diverted to other facilities. No further deliveries shall be received until a 24 hour turnaround for raw material is achievable. [District Rule 4102]
18. The owner and/or operator shall comply with all the provisions of District Rule 4102, Nuisance. [District Rule 4102]
19. Permittee shall keep daily and annual records of the amount of raw material received. [District Rule 2201] Federally Enforceable Through Title V Permit
20. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made readily available for District inspection upon request. [District Rules 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

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# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-72-3-9

EXPIRATION DATE: 08/30/2009

## EQUIPMENT DESCRIPTION:

ANIMAL RENDERING OPERATION INCLUDING MEAT AND BONE MEAL COOKING OPERATION WITH ONE (1) HOGGER, ONE SCREEN SCREW AND CONVEYANCE SCREW SYSTEM, ONE (1) BACKUP CLARIFIER, ONE (1) CENTRIFUGE, THREE (3) PRESSORS, EIGHTEEN (18) FAT, YELLOW GREASE, AND TALLOW TANKS, AND THREE (3) DUPPS MODEL 1200 COOKERS SERVED BY ONE 10 MMBTU/HR SPENCER THERMAL OXIDIZER/AFTERBURNER SERIAL #1295 AND ONE 250 HP HURST WASTEHEAT RECOVERY BOILER

## PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained and operated according to the specifications and plans contained in the permit application except as otherwise specified herein. [District NSR Rule] Federally Enforceable Through Title V Permit
2. All equipment or systems installed or used to achieve compliance with the terms and conditions of this permit shall be maintained in good working order and be operated as efficiently as possible to minimize air pollution emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
3. The Air Pollution Control District shall be immediately notified of any breakdown or malfunction that reduces or disrupts the normal processing of odors required by this permit. [District Rule 4102]
4. The District shall have authority to investigate possible odors alleged to originate from the facility and to make a determination of whether or not a nuisance exists, either in response to a complaint or on its own initiative. [District Rules 1070 and 4102] Federally Enforceable Through Title V Permit
5. The APCO or any authorized representative shall have access to inspect any equipment, operation, records, method required in this permit, to sample emissions from the source or require samples to be taken, or perform any other actions to assure compliance with the requirements of this permit and all District rules and regulations. [District Rule 1070] Federally Enforceable Through Title V Permit
6. The rendering plant shall not be operated unless the odor control system is operating and in full use. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The premises of the plant shall be kept clean and free from spillage of raw or finished materials, refuse, and standing pools of water which may present a nuisance condition. All raw material spills shall be cleaned up immediately. [District Rule 4102]
8. All non-condensable emissions and vapors shall be incinerated in the thermal oxidizer at a minimum temperature of 1200 degrees F and a minimum retention time of 0.57 seconds. [District Rules 4102 and 4104] Federally Enforceable Through Title V Permit
9. The thermal oxidizer temperature shall be monitored by a continuously recording temperature device. [District NSR Rule and District Rules 4102 and 4104] Federally Enforceable Through Title V Permit
10. Thermocouple installed at the rear of the thermal oxidizer shall provide accurate temperature readings of flue gas. An audible alarm shall be installed to alert facility personnel to low temperature readings. [District NSR Rule and District Rules 4102 and 4104] Federally Enforceable Through Title V Permit
11. If the District determines that the combustion of yellow grease is causing a nuisance then the facility must cease combustion of this product in the thermal oxidizer/afterburner. [District Rule 4102]

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

12. The sulfur content of the diesel fuel used shall not exceed 0.0015% by weight. [District NSR Rule] Federally Enforceable Through Title V Permit
13. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
14. The thermal oxidizer shall only be fired by PUC-regulated natural gas, yellow grease, or denatured yellow grease as primary fuels, with fuel oil No. 2 (diesel) as backup. [District NSR Rule] Federally Enforceable Through Title V Permit
15. Denatured yellow grease is yellow grease blended with fuel oil No. 2, not to exceed 1.0% fuel oil No. 2 by volume. [District NSR Rule] Federally Enforceable Through Title V Permit
16. Permittee shall maintain records of the gallons of fuel oil and yellow grease blended to make the denatured yellow grease fuel. [District NSR Rule] Federally Enforceable Through Title V Permit
17. Except for diesel fuel used to make denatured yellow grease, diesel fuel shall only be used whenever natural gas, yellow grease, and denatured yellow grease are not available. [District NSR Rule] Federally Enforceable Through Title V Permit
18. The amount of diesel used as fuel in the thermal oxidizer shall not exceed 504 gallons per day. [District NSR Rule] Federally Enforceable Through Title V Permit
19. Emissions from the thermal oxidizer shall not exceed any of the following limits: 0.59 lb-NO<sub>x</sub>/MMBtu, 0.015 lb-VOC/MMBtu, 0.25 lb-SO<sub>x</sub>/MMBtu, 0.7 lb-CO/MMBtu, or 0.16 lb-PM<sub>10</sub>/MMBtu. All emissions measurements shall be averaged over a period of 15 minutes. [District NSR Rule] Federally Enforceable Through Title V Permit
20. NO<sub>x</sub> emissions as a result of firing this thermal oxidizer using any combination of the permitted fuels shall not exceed either of the following limits: 141.6 lb NO<sub>x</sub>/day or 51,684 lb NO<sub>x</sub>/year. [District NSR Rule] Federally Enforceable Through Title V Permit
21. VOC emissions as a result of firing this thermal oxidizer using any combination of the permitted fuels shall not exceed 3.6 lb VOC/day. [District NSR Rule] Federally Enforceable Through Title V Permit
22. SO<sub>x</sub> emissions as a result of firing this thermal oxidizer using any combination of the permitted fuels shall not exceed 60.0 lb SO<sub>x</sub>/day. [District NSR Rule] Federally Enforceable Through Title V Permit
23. CO emissions as a result of firing this thermal oxidizer using any combination of the permitted fuels shall not exceed 168.0 lb CO/day. [District NSR Rule] Federally Enforceable Through Title V Permit
24. PM<sub>10</sub> emissions as a result of firing this thermal oxidizer using any combination of the permitted fuels shall not exceed 38.4 lb PM<sub>10</sub>/day. [District NSR Rule] Federally Enforceable Through Title V Permit
25. Daily and annual NO<sub>x</sub> emissions are calculated as follows: Total pounds of NO<sub>x</sub> emissions = 0.0006 X cubic feet (Natural Gas) + 0.08 X gallons (Yellow Grease/Denatured Yellow Grease) + 0.08 X gallons (Diesel). [District NSR Rule] Federally Enforceable Through Title V Permit
26. Daily VOC emissions are calculated as follows: Total pounds of VOC emissions = 1.5E-05 X cubic feet (Natural Gas) + 0.0020 X gallons (Yellow Grease/Denatured Yellow Grease) + 0.0021 X gallons (Diesel). [District NSR Rule] Federally Enforceable Through Title V Permit
27. Daily SO<sub>x</sub> emissions are calculated as follows: Total pounds of SO<sub>x</sub> emissions = 2.5E-04 X cubic feet (Natural Gas) + 0.033 X gallons (Yellow Grease/Denatured Yellow Grease) + 0.034 X gallons (Diesel). [District NSR Rule] Federally Enforceable Through Title V Permit
28. Daily CO emissions are calculated as follows: Total pounds of CO emissions = 7.0E-04 X cubic feet (Natural Gas) + 0.091 X gallons (Yellow Grease/Denatured Yellow Grease) + 0.096 X gallons (Diesel). [District NSR Rule] Federally Enforceable Through Title V Permit
29. Daily PM<sub>10</sub> emissions are calculated as follows: Total pounds of PM<sub>10</sub> emissions = 1.6E-04 X cubic feet (Natural Gas) + 0.021 X gallons (Yellow Grease/Denatured Yellow Grease) + 0.022 X gallons (Diesel). [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

30. The stack concentration of NO<sub>x</sub> (as NO<sub>2</sub>), CO, and O<sub>2</sub> shall be measured at least on a monthly basis using District approved portable analyzers for any fuel fired during the period since the prior monthly test. Operating on a fuel for emissions monitoring purposes only does not need to be performed, provided compliance with emission limits was shown for that fuel during the previous monthly test. [District Rule 1081] Federally Enforceable Through Title V Permit
31. Concentration measurements shall not be taken until the sample acquisition probe has been exposed to the stack gas for at least 150% of the response time. Measurements shall be taken in triplicate. [District Rule 1081] Federally Enforceable Through Title V Permit
32. A non-resettable, totalizing volumetric fuel flow meter shall be utilized to measure the cubic feet of natural gas combusted in the thermal oxidizer. [District NSR Rule] Federally Enforceable Through Title V Permit
33. A separate non-resettable, totalizing liquid fuel flow meter shall be utilized to measure the gallons of yellow grease combusted in the thermal oxidizer. [District NSR Rule] Federally Enforceable Through Title V Permit
34. A separate non-resettable, totalizing liquid fuel flow meter shall be utilized to measure the gallons of diesel fuel combusted in the thermal oxidizer. [District NSR Rule] Federally Enforceable Through Title V Permit
35. Records of the daily and annual amounts of Natural Gas, Yellow Grease, and Diesel fuels combusted in the thermal oxidizer and of the sulfur content of the diesel fuel shall be maintained. [District NSR Rule] Federally Enforceable Through Title V Permit
36. Emissions from the cookers must be vented to, and condensed in, the air-to-air condensers. [District NSR Rule] Federally Enforceable Through Title V Permit
37. Emissions from the hot crax holding bin and the crax transfer screw must be vented to the 16" 2D-2D cyclone, and then to the thermal oxidizer. [District NSR Rule] Federally Enforceable Through Title V Permit
38. Emissions from the condensers must be vented to the 24" 2D-2D cyclone, and then to the thermal oxidizer. [District NSR Rule] Federally Enforceable Through Title V Permit
39. Emissions from the presses, tallow work tanks, bird machine, screen screw, over press screw, hogger, wet crax transfer elevators, and tallow elevator must be vented to the 36" 2D-2D cyclone and then to the thermal oxidizer. [District NSR Rule] Federally Enforceable Through Title V Permit
40. All non-condensibles from the condensers and vapors from the presses, tallow work tanks, bird machine, screen screw, press screw, hogger, transfer screw, bins and elevators shall be incinerated in the thermal oxidizer at all times during operation. [District NSR Rule] Federally Enforceable Through Title V Permit
41. The owner and/or operator shall comply with all the provisions of District Rule 4102, Nuisance. [District Rule 4102]
42. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made readily available for District inspection upon request. [District Rules 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

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# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-72-6-2

EXPIRATION DATE: 06/30/2009

## EQUIPMENT DESCRIPTION:

GASOLINE DISPENSING OPERATION WITH ONE 1,000 GALLON ABOVEGROUND STORAGE TANK SERVED BY TWO-POINT PHASE I VAPOR RECOVERY SYSTEM (G-70-142-A), AND 1 FUELING POINT WITH PHASE II EXEMPT GASOLINE DISPENSING NOZZLE

## PERMIT UNIT REQUIREMENTS

1. The Phase I vapor recovery system shall be installed and maintained in accordance with the manufacturer specifications and the ARB Executive Order specified in this permit, including applicable rules and regulations of the Division of Measurement Standards of the Department of Food and Agriculture, the Office of the State Fire Marshal of the Department of Forestry and Fire Protection, the Division of Occupational Safety and Health of the Department of Industrial Relations, and the Division of Water Quality of the State Water Resources Control Board that have been made conditions of the certification. [District Rule 4621] Federally Enforceable Through Title V Permit
2. Total gasoline throughput for the facility shall not exceed either of the following: 10,000 gallons in any consecutive 30-day period or 24,000 gallons per calendar year. If throughput exceeds stated limits, the permittee shall submit a complete application for an Authority to Construct (ATC) to the District within 30 days of the loss of exemption and install and test a certified Phase II vapor recovery system within six (6) months from the date the ATC is issued. [District Rule 4622] Federally Enforceable Through Title V Permit
3. The storage container shall be maintained and operated such that it is leak-free. [District Rule 4621, 5.4.1] Federally Enforceable Through Title V Permit
4. The Phase I vapor recovery systems and gasoline dispensing equipment shall be maintained without leaks as determined in accordance with the test method specified in this permit. [District Rule 4621, 5.4.1] Federally Enforceable Through Title V Permit
5. A leak is defined as the dripping of VOC-containing liquid at a rate of more than three (3) drops per minute, or the detection of any gaseous or vapor emissions with a concentration of total organic compound greater than 10,000 ppmv, as methane, above background when measured in accordance with EPA Test Method 21. [District Rule 4621, 3.19.2] Federally Enforceable Through Title V Permit
6. No gasoline delivery vessel shall be operated or be allowed to operate unless valid State of California decals are displayed on the cargo container, which attest to the vapor integrity of the container. [District Rule 4621, 5.7.2] Federally Enforceable Through Title V Permit
7. The permittee shall conduct periodic maintenance inspections based on the greatest monthly throughput of gasoline dispensed by the facility in the previous year as follows: A) less than 2,500 gallons - one day per month; B) 2,500 to less than 25,000 gallons - one day per week; or C) 25,000 gallons or greater - five days per week. All inspections shall be documented within the O & M Manual. [District Rule 4621, 5.5] Federally Enforceable Through Title V Permit
8. Periodic maintenance inspections of the Phase I vapor recovery system shall include, at a minimum, verification that 1) the fill caps and vapor caps are not missing, damaged, or loose; 2) the fill cap gasket and vapor cap gaskets are not missing or damaged; 3) the fill adapter and vapor adapter are securely attached to the risers; 4) where applicable, the spring-loaded submerged fill tube seals properly against the coaxial tubing; 5) the dry break (poppet-valve) is not missing or damaged; and 6) the submerged fill tube is not missing or damaged. [District Rule 4621, 5.5] 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.

9. The permittee shall conduct all periodic vapor recovery system performance tests specified in this permit, no more than 30 days before or after the required compliance testing date, unless otherwise required under the applicable ARB Executive Order. [District Rule 4621, 5.4.5] Federally Enforceable Through Title V Permit
10. The permittee shall perform and pass a Static Leak Test for Aboveground Tanks using ARB TP-201.3B or TP-206.3 at least once every 36 months. [District Rule 4621, 5.4.5] Federally Enforceable Through Title V Permit
11. A person conducting testing of, or repairs to, a certified vapor recovery system shall be in compliance with District Rule 1177 (Gasoline Dispensing Facility Tester Certification). [District Rule 4621, 6.3.1] Federally Enforceable Through Title V Permit
12. A person performing installation of, or maintenance on, a certified Phase I vapor recovery system shall be certified by the ICC for Vapor Recovery System Installation and Repair, or work under the direct and personal supervision of an individual physically present at the work site who is certified. The ICC certification shall be renewed every 24 months. [District Rule 4621, 6.3.1] Federally Enforceable Through Title V Permit
13. Proof of the ICC certification and all other certifications required by the Executive Order and installation and operation manual shall be made available onsite. [District Rule 4621, 6.3.1] Federally Enforceable Through Title V Permit
14. The permittee shall notify the District at least 7 days prior to each performance test. The test results shall be submitted to the District no later than 30 days after the completion of each test. [District Rule 4621, 6.2.3 and 6.2.4] Federally Enforceable Through Title V Permit
15. The permittee shall maintain monthly and annual gasoline throughput records. [District Rules 4621 and 4622, 6.1.4] Federally Enforceable Through Title V Permit
16. All records required by this permit shall be retained on-site for a period of at least five years and shall be made available for District inspection upon request. [District Rule 4621, 6.1.4] Federally Enforceable Through Title V Permit

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

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# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-72-7-9

EXPIRATION DATE: 06/30/2009

## EQUIPMENT DESCRIPTION:

39.5 MMBTU/HR ERIE CITY IRON WORKS MODEL 95355 NATURAL GAS OR YELLOW GREASE FIRED BOILER WITH A TODD MODEL RMB ULTRA LOW NOX BURNER AND FORCED DRAFT FLUE GAS RECIRCULATION SYSTEM

## PERMIT UNIT REQUIREMENTS

1. {4194} Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320]
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
3. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. If the District determines that the combustion of yellow grease or denatured yellow grease is causing a nuisance then the facility must cease combustion of this product in the boiler. [District Rule 4102]
5. {450} Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rule 4201 and District Rule 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
6. This boiler shall only be fired on PUC-regulated natural gas, yellow grease, or denatured yellow grease. [District NSR Rule and District Rule 4301, 5.2.1] Federally Enforceable Through Title V Permit
7. Denatured yellow grease is yellow grease blended with fuel oil No. 2, not to exceed 1.0% fuel oil No. 2 by volume. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Permittee shall maintain records of the gallons of fuel oil and yellow grease blended to make the denatured yellow grease fuel. [District NSR Rule] Federally Enforceable Through Title V Permit
9. {2813} Operator shall record all dates on which the unit is fired on any fuel other than PUC-regulated natural gas. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
10. {2804} Operator shall maintain copies of fuel invoices and supplier certifications. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
11. Operator shall provide that fuel hhv be certified by third party fuel supplier or determined annually by: ASTM D 240 or D 2382 for liquid hydrocarbon fuels; ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.3.2; 4305, 6.2.1; 4306, 6.2.1; and 4351, 6.2.1] Federally Enforceable Through Title V Permit
12. Operator shall monitor and record for each unit the hhv and cumulative annual use of each fuel. [District Rules 4305, 6.1.1; 4306, 6.1.1; and 4351, 6.1.1] 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. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the unit shall be utilized and maintained. Volumetric flow measurements shall be periodically compensated for temperature and pressure. [District NSR Rule and District Rules 4305 and 4306, 5.4.1] Federally Enforceable Through Title V Permit
14. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of yellow grease (and denatured yellow grease) combusted in the unit shall be utilized and maintained. Volumetric flow measurements shall be periodically compensated for temperature and pressure. [District NSR Rule and District Rule 4305 and 4306, 5.4.1] Federally Enforceable Through Title V Permit
15. The combined amount of yellow grease and denatured yellow grease combusted in the unit shall not exceed any of the following limits: 4,736 gallons per day or 1,730,139 gallons per year. [District NSR Rule] Federally Enforceable Through Title V Permit
16. When fired on natural gas, emissions rates from the unit shall not exceed any of the following limits: 9 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.011 lb-NO<sub>x</sub>/MMBtu, 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, 200 ppmvd CO @ 3% O<sub>2</sub> or 0.146 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District NSR Rule and District Rules 4305 and 4306, 5.1] Federally Enforceable Through Title V Permit
17. When fired on yellow grease or denatured yellow grease, emissions rates from the unit shall not exceed any of the following limits: 40 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.052 lb-NO<sub>x</sub>/MMBtu, 0.002 lb-SO<sub>x</sub>/MMBtu, 0.016 lb-PM<sub>10</sub>/MMBtu, 200 ppmvd CO @ 3% O<sub>2</sub> or 0.166 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District NSR Rule and District Rules 4305 and 4306, 5.1] Federally Enforceable Through Title V Permit
18. The amount of NO<sub>x</sub> emissions from this unit as a result of firing any combination of permitted fuels shall not exceed any of the following limits: 34.1 lb-NO<sub>x</sub> per day or 12,457 lb-NO<sub>x</sub> per year. [District NSR Rule] Federally Enforceable Through Title V Permit
19. Annual and daily NO<sub>x</sub> emissions shall be calculated as:  $[(1.1E-05 \text{ lb-NO}_x/\text{scf}) \times (\text{amount of natural gas usage in scf}) + (7.2E-03 \text{ lb-NO}_x/\text{gal}) \times (\text{amount of yellow grease usage in gallons})]$ . [District NSR Rule] Federally Enforceable Through Title V Permit
20. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306, 5.4.2] Federally Enforceable Through Title V Permit
21. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306, 5.4.2] Federally Enforceable Through Title V Permit
22. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305 and 4306, 5.4.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

23. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306, 5.4.2] Federally Enforceable Through Title V Permit
24. Operator shall ensure that all required source testing conforms to the compliance testing procedures described in District Rule 1081. [District Rule 1081] Federally Enforceable Through Title V Permit
25. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
26. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306, 5.5.1] Federally Enforceable Through Title V Permit
27. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305 and 4306, 5.5.5] Federally Enforceable Through Title V Permit
28. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
29. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
30. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305 and 4306, 5.5.2] Federally Enforceable Through Title V Permit
31. Source testing to measure natural gas combustion NO<sub>x</sub> and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305 and 4306, 6.3.1] Federally Enforceable Through Title V Permit
32. Source testing to measure yellow grease combustion NO<sub>x</sub> and CO emissions from this unit shall be performed within 60 days of the combined amount of yellow grease and denatured yellow grease usage exceeding 29,877 gallons during any rolling 12-month period unless compliance with yellow grease NO<sub>x</sub> and CO emissions has been demonstrated within 12 months prior to the date of the exceedance. After demonstrating compliance on two (2) consecutive source tests when the unit is fired on yellow grease, the unit shall be tested within 60 days of the combined amount of yellow grease and denatured yellow grease usage exceeding 29,877 gallons during any rolling 12-month period unless compliance with yellow grease NO<sub>x</sub> and CO emissions has been demonstrated within 36 months prior to the date of the exceedance. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to the rolling 12-month period according to the requirements described above. [District NSR Rule and District Rules 4305 and 4306, 6.3.1] Federally Enforceable Through Title V Permit
33. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305 and 4306, 6.2.2 and 6.2.5] Federally Enforceable Through Title V Permit
34. Nitrogen oxide (NO<sub>x</sub>) emission concentrations in ppmv referenced at dry stack emissions shall be corrected to 3% O<sub>2</sub> and lb/MMBtu rates shall be calculated as lb NO<sub>2</sub>/MMBtu of heat input (hhv). [District Rules 4305, 8.1; 4306, 8.1, 8.2; and 4351, 8.1] 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.

35. When calculating NOx emission limit for natural gas based on heat input (lb/MMBtu), fuel hhv shall be certified by third party supplier or ASTM D 1826-88 or D 1945-81 in conjunction with ASTM D 3588-89. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
36. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305 and 4306, 6.2.3] Federally Enforceable Through Title V Permit
37. Stack gas oxygen (O2) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305 and 4306, 6.2.4] Federally Enforceable Through Title V Permit
38. Source testing to measure concentrations of volatile organic compounds (VOC) shall be conducted using EPA methods 18 or 25, or CARB method 100. [District NSR Rule] Federally Enforceable Through Title V Permit
39. Source testing to measure concentrations of oxides of sulfur (SOx) as SO2 shall be conducted using EPA Methods 6 or 8, or CARB Method 100. [District NSR Rule] Federally Enforceable Through Title V Permit
40. Source testing to measure concentrations of PM10 shall be conducted using EPA Method 201 and 202, or EPA Method 201a and 202. [District NSR Rule] Federally Enforceable Through Title V Permit
41. In lieu of performing a source test for PM10, the results of the total particulate test may be used for compliance with the PM10 emissions limit. If this option is used, then all of the particulate emissions will be considered to be PM10. [District NSR Rule] Federally Enforceable Through Title V Permit
42. Source testing to measure concentrations of total particulate emissions shall be conducted using CARB Method 5. [District NSR Rule] Federally Enforceable Through Title V Permit
43. The permittee shall maintain records of daily, monthly, and annual yellow grease and denatured yellow grease usage and the dates the unit operated on yellow grease or denatured yellow grease. [District NSR Rule and District Rule 1070] Federally Enforceable Through Title V Permit
44. The permittee shall maintain records of daily, monthly, and annual natural gas usage. [District NSR Rule] Federally Enforceable Through Title V Permit
45. {4253} Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and Rule 4320]
46. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070; 2520, 9.4.2; 4305, and 4306, 6.1] Federally Enforceable Through Title V Permit
47. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: SJVUAPCD Rule 4801. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
48. {2814} Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rule 4201 and 4301. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
49. {2815} Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rule 4305, Sec. 4.2, 5.1.1, 5.1.2,, 5.4, 6.1.1, 6.2 (excepting 6.2.3), 6.3, 8.1 and Rule 4351 Sec 4.2, 5.2.2.1, 5.2.2.2, 6.1.1, 6.2 (excepting 6.2.3), 8.1. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
50. {2810} The requirements of 40 CFR 72.6(b) are not applicable because this is not an affected unit under the acid rain provisions. The requirements of 40 CFR 60.40c do not apply to this source because it is not used to produce electricity for sale. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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

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# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-72-8-5

EXPIRATION DATE: 06/30/2009

## EQUIPMENT DESCRIPTION:

37.8 MMBTU/HR HURST MODEL SERIES 500 NATURAL GAS/YELLOW GREASE-FIRED BOILER EQUIPPED WITH JOHN ZINC/GORDON PIATT ULTRA LOW-NOX BURNER MODEL RMB-GO-90-E2-30-F9H WITH FORCED FGR

## PERMIT UNIT REQUIREMENTS

1. {4194} Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320]
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
3. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. If the District determines that the combustion of yellow grease or denatured yellow grease is causing a nuisance then the facility must cease combustion of this product in the boiler. [District Rule 4102]
5. {450} Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rule 4201 and District Rule 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
6. The boiler shall only be fired by PUC-regulated natural gas, yellow grease, or denatured yellow grease as primary fuels, with fuel oil #2 (diesel) as backup. [District NSR Rule and District Rule 4301, 5.2.1 and 40 CFR § 60.42c(d)] Federally Enforceable Through Title V Permit
7. Denatured yellow grease is yellow grease blended with fuel oil No. 2, not to exceed 1.0% fuel oil No.2 by volume. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Permittee shall maintain records of the gallons of fuel oil and yellow grease blended to make the denatured yellow grease fuel. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Except for diesel fuel used to make denatured yellow grease, this unit shall only be fired on fuel oil #2 (diesel) during natural gas curtailment for no more than 168 cumulative hours in a calendar year plus 48 hours per calendar year for equipment testing. [District NSR Rule and District Rule 4306, 4.2.1] Federally Enforceable Through Title V Permit
10. The sulfur content of the diesel fuel used shall not exceed 0.05% by weight. [District NSR Rule and 40 CFR § 60.42c(d) and 40 CFR § 60.43c(e)(4)] Federally Enforceable Through Title V Permit
11. Natural gas consumption shall not exceed 771,264 scf per day. [District NSR Rule] Federally Enforceable Through Title V Permit
12. The combined amount of yellow grease and denatured yellow grease combusted in this boiler shall not exceed 3,914 gallons per day. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The amount of Fuel Oil #2 (Diesel) used as fuel in the boiler shall not exceed either of the following limits: 1,448 gallons per day or 13,031 gallons per year. [District NSR Rule] Federally Enforceable Through Title V Permit

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

14. A non-resettable, totalizing volumetric fuel flow meter shall be utilized to measure the cubic feet of natural gas combusted in the boiler. [District NSR Rule and District Rules 4305 and 4306, 5.4.1] Federally Enforceable Through Title V Permit
15. A separate non-resettable, totalizing liquid fuel flow meter to measure, in gallons, the yellow grease (and denatured yellow grease) combusted in the boiler shall be utilized. [District NSR Rule and District Rules 4305 and 4306, 5.4.1] Federally Enforceable Through Title V Permit
16. A separate non-resettable, totalizing liquid fuel flow meter shall be utilized to measure the gallons of Fuel Oil #2 (Diesel) combusted in the boiler. [District NSR Rule and District Rule 4306, 4.2.1] Federally Enforceable Through Title V Permit
17. Operator shall provide that fuel hhv be certified by third party fuel supplier or determined annually by: ASTM D 240 or D 2382 for liquid hydrocarbon fuels; ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.3.2; 4305, 6.2.1; 4306, 6.2.1; and 4351, 6.2.1] Federally Enforceable Through Title V Permit
18. Emissions shall not exceed any of the following limits when fired on natural gas: 9 ppmv NO<sub>x</sub> @ 3% O<sub>2</sub> (0.011 lb NO<sub>x</sub>/MMBtu), 0.00285 lb SO<sub>x</sub>/MMBtu, 0.0076 lb PM<sub>10</sub>/MMBtu, 175 ppmv CO @ 3% O<sub>2</sub> (0.1295 lb CO/MMBtu), or 0.0042 lb VOC/MMBtu. All emissions measurements shall be averaged over a period of 15 minutes. [District NSR Rule and District Rules 4305 and 4306, 5.1] Federally Enforceable Through Title V Permit
19. Emissions shall not exceed any of the following limits when fired on yellow grease or denatured yellow grease: 40 ppmv NO<sub>x</sub> @ 3% O<sub>2</sub> (0.0546 lb NO<sub>x</sub>/MMBtu), 0.002 lb SO<sub>x</sub>/MMBtu, 0.016 lb PM<sub>10</sub>/MMBtu, 200 ppmv CO @ 3% O<sub>2</sub> (0.166 lb CO/MMBtu) or 0.0056 lb VOC/MMBtu. All emissions measurements shall be averaged over a period of 15 minutes. [District NSR Rule and District Rules 4305 and 4306, 5.1] Federally Enforceable Through Title V Permit
20. Emissions shall not exceed any of the following limits when fired on Fuel Oil #2: 19.2 lb NO<sub>x</sub>/1,000 gal (0.140 lb-NO<sub>x</sub>/MMBtu), 7.1 lb SO<sub>x</sub>/1,000 gal, 2.0 lb PM<sub>10</sub>/1,000 gal, 5.5 lb CO/1,000 gal, or 0.137 lb VOC/1,000 gal. All emissions measurements shall be averaged over a period of 15 minutes. [District NSR Rule and District Rule 4306, 4.2.2] Federally Enforceable Through Title V Permit
21. Ongoing compliance with the daily or annual NO<sub>x</sub> emissions limit is calculated as follows: Total pounds of NO<sub>x</sub> emissions = 1.1E-05 X cubic feet (Natural Gas) + 0.0072 X gallon (Yellow Grease and Denatured Yellow Grease) + 0.0192 X gallon (Fuel Oil #2). [District NSR Rule and District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
22. NO<sub>x</sub> emissions as a result of firing this boiler using any combination of Natural Gas, Yellow Grease, Denatured Yellow Grease, and Fuel Oil #2 shall not exceed either of the following: 27.8 lb NO<sub>x</sub>/day or 3,642 lb NO<sub>x</sub>/year. [District NSR Rule and District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
23. VOC emissions as a result of firing this boiler using any combination of Natural Gas, Yellow Grease, Denatured Yellow Grease, and Fuel Oil #2 shall not exceed 3.2 lb VOC/day. [District NSR Rule] Federally Enforceable Through Title V Permit
24. SO<sub>x</sub> emissions as a result of firing this boiler using any combination of Natural Gas, Yellow Grease, Denatured Yellow Grease, and Fuel Oil #2 shall not exceed 10.3 lb SO<sub>x</sub>/day. [District NSR Rule] Federally Enforceable Through Title V Permit
25. CO emissions as a result of firing this boiler using any combination of Natural Gas, Yellow Grease, Denatured Yellow Grease, and Fuel Oil #2 shall not exceed 99.9 lb CO/day. [District NSR Rule] Federally Enforceable Through Title V Permit
26. PM<sub>10</sub> emissions as a result of firing this boiler using any combination of Natural Gas, Yellow Grease, Denatured Yellow Grease, and Fuel Oil #2 shall not exceed 8.2 lb PM<sub>10</sub>/day. [District NSR Rule] Federally Enforceable Through Title V Permit

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

27. If the unit is fired on diesel fuel that is not supplier-certified 0.05% sulfur content or less, then the sulfur content of the fuel being fired in the unit shall be determined using ASTM method D 1072, D 3031, D 4084 or D 3246. [District Rule 2520, 9.3.2 and 40 CFR § 60.42c(d), 40 CFR § 60.44c(g), and 40 CFR § 60.46c(d)] Federally Enforceable Through Title V Permit
28. If the unit is fired on diesel fuel that is not supplier-certified 0.05% sulfur content or less, the sulfur content of each fuel source shall be tested weekly, except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be semi-annually. [District Rule 2520, 9.4.2 and 40 CFR § 60.42c(d), 40 CFR § 60.44c(g), and 40 CFR § 60.46c(d)] Federally Enforceable Through Title V Permit
29. Operator shall maintain copies of fuel invoices and supplier certifications. [District Rule 2520, 9.4.2 and 40 CFR § 60.42c(d)(h), 40 CFR § 60.44c(h), 40 CFR § 60.46c(e), and 40 CFR 60.48c(f)] Federally Enforceable Through Title V Permit
30. {2813} Operator shall record all dates on which the unit is fired on any fuel other than PUC-regulated natural gas. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
31. Operator shall monitor and record for each unit the hhv and cumulative annual use of each fuel. [District Rules 4305, 6.1.1, 4306, 6.1.1 and District Rule 4351, 6.1.1] Federally Enforceable Through Title V Permit
32. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
33. Operator shall ensure that all required source testing conforms to the compliance testing procedures described in District Rule 1081. [District Rule 1081 and Fresno County Rule 108.1] Federally Enforceable Through Title V Permit
34. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306, 5.5.1] Federally Enforceable Through Title V Permit
35. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305 and 4306, 5.5.5] Federally Enforceable Through Title V Permit
36. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
37. Source testing to measure NOx and CO combustion emissions from this boiler while firing on denatured yellow grease shall be conducted within 60 days of initial firing on denatured yellow grease. [District NSR Rule and District Rules 4102, 4305 and 4306, 6.3.1] Federally Enforceable Through Title V Permit
38. Source testing to measure natural gas combustion NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305 and 4306, 6.3.1] Federally Enforceable Through Title V Permit
39. Source testing to measure yellow grease combustion NOx and CO emissions from this unit shall be performed within 60 days of the combined amount of yellow grease and denatured yellow grease usage exceeding 29,958 gallons during any rolling 12-month period unless compliance with yellow grease NOx and CO emissions has been demonstrated within 12 months prior to the date of the exceedance. After demonstrating compliance on two (2) consecutive source tests when the unit is fired on yellow grease, the unit shall be tested within 60 days of the combined amount of yellow grease and denatured yellow grease usage exceeding 29,958 gallons during any rolling 12-month period unless compliance with yellow grease NOx and CO emissions has been demonstrated within 36 months prior to the date of the exceedance. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to the rolling 12-month period according to the requirements described above. [District NSR Rule and District Rules 4305 and 4306, 6.3.1] 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.

40. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
41. Source testing to measure concentrations of oxides of nitrogen (as NO<sub>2</sub>, ppmv) shall be conducted using EPA Method 7E or CARB Method 100; EPA Method 19 for NO<sub>x</sub> emission rate (lb/MMBtu). [District Rules 4305 and 4306, 6.2.2 and 6.2.5] Federally Enforceable Through Title V Permit
42. Nitrogen oxide (NO<sub>x</sub>) emission concentrations in ppmv referenced at dry stack emissions shall be corrected to 3% O<sub>2</sub> and lb/MMBtu rates shall be calculated as lb NO<sub>2</sub>/MMBtu of heat input (hhv). [District Rules 4305, 8.1, 4306, 8.1, 8.2; and 4351, 8.1] Federally Enforceable Through Title V Permit
43. Source testing to measure concentrations of carbon monoxide (CO) shall be conducted using EPA Method 10 or CARB Method 100. [District Rules 4305 and 4306, 6.2.3] Federally Enforceable Through Title V Permit
44. Source testing to measure the stack gas oxygen shall be conducted using EPA Methods 3 or 3A, or CARB Method 100. [District Rules 4305 and 4306, 6.2.4] Federally Enforceable Through Title V Permit
45. Source testing to measure concentrations of oxides of sulfur (SO<sub>x</sub>) as SO<sub>2</sub> shall be conducted using EPA Methods 6 or 8, or CARB Method 100. [District NSR Rule] Federally Enforceable Through Title V Permit
46. Source testing to measure concentrations of PM<sub>10</sub> shall be conducted using EPA Method 201 and 202, or EPA Method 201a and 202, or CARB Method 501 and 5. [District NSR Rule] Federally Enforceable Through Title V Permit
47. In lieu of performing a source test for PM<sub>10</sub>, the results of the total particulate test may be used for compliance with the PM<sub>10</sub> emissions limit. If this option is used, then all of the particulate emissions will be considered to be PM<sub>10</sub>. [District NSR Rule] Federally Enforceable Through Title V Permit
48. Source testing to measure concentrations of total particulate emissions shall be conducted using CARB Method 5. [District NSR Rule] Federally Enforceable Through Title V Permit
49. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305 and 4306, 5.5.2] Federally Enforceable Through Title V Permit
50. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306, 5.4.2] Federally Enforceable Through Title V Permit
51. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306, 5.4.2] Federally Enforceable Through Title V Permit

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

52. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305 and 4306, 5.5.2, 5.5.4] Federally Enforceable Through Title V Permit
53. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306, 5.4.2] Federally Enforceable Through Title V Permit
54. If the unit is fired on back-up fuel (i.e. diesel) for a period exceeding 48 cumulative hours in a calendar year, the permittee shall monitor and record the stack concentration of NO<sub>x</sub> at least once during that year using an APCO approved portable NO<sub>x</sub> analyzer. Monitoring for back-up fuel NO<sub>x</sub> emissions shall not be required when the unit is operating on primary fuel, i.e. the unit need not be fired on back-up fuel solely to perform monitoring. [District Rule 4306, 6.1.1] Federally Enforceable Through Title V Permit
55. Back-up fuel NO<sub>x</sub> emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4306, 6.1.1] Federally Enforceable Through Title V Permit
56. The permittee shall maintain records of: (1) the date and time of back-up fuel NO<sub>x</sub> measurements, (2) the measured back-up fuel NO<sub>x</sub> concentration (in ppmv or lb/MMBtu) corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4306, 6.1.1] Federally Enforceable Through Title V Permit
57. The permittee shall maintain records of daily consumption of natural gas. [District NSR Rule and District Rule 1070] Federally Enforceable Through Title V Permit
58. The permittee shall maintain records of dates the boiler operated on yellow grease or denatured yellow grease and the daily and annual amount of yellow grease and denatured yellow grease that was combusted in the boiler (in gallons). [District NSR Rule and District Rule 1070] Federally Enforceable Through Title V Permit
59. The permittee shall maintain records of daily and annual amount of fuel oil that was combusted in the boiler (in gallons). [District NSR Rule and District Rule 1070] Federally Enforceable Through Title V Permit
60. The permittee shall monitor and record the cumulative annual hours of operation when fired on fuel oil No. 2 during natural gas curtailment and testing. [District Rules 4305 and 4306, 6.1.1] Federally Enforceable Through Title V Permit
61. {4253} Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and Rule 4320]
62. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306, 6.1] Federally Enforceable Through Title V Permit
63. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 1081, 4201, 4301, and 4801. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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

64. {2810} The requirements of 40 CFR 72.6(b) are not applicable because this is not an affected unit under the acid rain provisions. The requirements of 40 CFR 60.40c do not apply to this source because it is not used to produce electricity for sale. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
65. {2815} Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rule 4305, Sec. 4.2, 5.1.1, 5.1.2,, 5.4, 6.1.1, 6.2 (excepting 6.2.3), 6.3, 8.1 and Rule 4351 Sec 4.2, 5.2.2.1, 5.2.2.2, 6.1.1, 6.2 (excepting 6.2.3), 8.1. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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

DRAFT

# San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-72-9-2

EXPIRATION DATE: 06/30/2009

## EQUIPMENT DESCRIPTION:

MEAT AND BONE MEAL STORAGE AND LOADOUT SYSTEM EQUIPPED WITH ONE (1) GRINDER, ONE (1) ELEVATOR, THREE (3) TRANSFER CONVEYORS, ONE FINISHED MATERIAL CONVEYANCE SCREW SYSTEM AND TWO (2) MEAT AND BONE MEAL BINS

## PERMIT UNIT REQUIREMENTS

1. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. All equipment shall be maintained and operated according to the specifications and plans contained in the permit application except as otherwise specified herein. [District NSR Rule] Federally Enforceable Through Title V Permit
3. All equipment or systems installed or used to achieve compliance with the terms and conditions of this permit shall be maintained in good working order and be operated as efficiently as possible to minimize air pollution emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The Air Pollution Control District shall be immediately notified of any breakdown or malfunction that reduces or disrupts the normal processing of odors required by this permit. [District Rule 4102]
5. The District shall have authority to investigate possible odors alleged to originate from the facility and to make a determination of whether or not a nuisance exists, either in response to a complaint or on its own initiative. [District Rules 1070 and 4102] Federally Enforceable Through Title V Permit
6. The APCO or any authorized representative shall have access to inspect any equipment, operation, records, method required in this permit, to sample emissions from the source or require samples to be taken, or perform any other actions to assure compliance with the requirements of this permit and all District rules and regulations. [District Rule 1070] Federally Enforceable Through Title V Permit
7. Total meat and bone meal loaded into delivery trucks shall not exceed 346,000 pounds (173 tons) per day or 82,344,000 (41,172 tons) per year. [District NSR Rule and District Rule 4102] Federally Enforceable Through Title V Permit
8. Daily emissions from the meat and bone meal (MBM) handling operation shall not exceed 0.4 lb PM10/day. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Tallow and yellow grease storage tanks shall be kept in good operating condition. These tanks shall not contribute to a nuisance condition. [District Rule 4102]
10. Permittee shall keep daily and annual records of the amount of meat and bone meal produced. [District NSR Rule] Federally Enforceable Through Title V Permit
11. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made readily available for District inspection upon request. [District Rules 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

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# ATTACHMENT B

Previous Title V Operating Permit

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# San Joaquin Valley Air Pollution Control District

FACILITY: C-72-0-0

EXPIRATION DATE: 06/30/2009

## FACILITY-WIDE REQUIREMENTS

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1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (3/21/02). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.12.1] Federally Enforceable Through Title V Permit
6. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
9. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name: BAKER COMMODITIES, INC  
Location: 18801 W JENSEN AVE, KERMAN, CA 93630  
C-72-0-0: Apr 29 2010 4:49PM - CLERICOB

10. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
13. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit
22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (11/15/01). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

23. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in the Table of Standards of District Rule 4601 (10/31/01) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. All VOC-containing materials for architectural coatings subject to Rule 4601 (10/31/01) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (10/31/01). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR 82, Subpart B. [40 CFR 82, Subpart B] Federally Enforceable Through Title V Permit
29. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8021 and 8011] Federally Enforceable Through Title V Permit
30. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8031 and 8011] Federally Enforceable Through Title V Permit
31. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8041 and 8011] Federally Enforceable Through Title V Permit
32. Whenever open areas are disturbed or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8051 and 8011] Federally Enforceable Through Title V Permit
33. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8061 and Rule 8011] Federally Enforceable Through Title V Permit
34. Any unpaved vehicle/equipment area that anticipates more than 75 vehicle trips per day shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 100 vehicle trips per day shall comply with the requirements of Section 5.1.2 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8071 and Rule 8011] Federally Enforceable Through Title V Permit
35. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit

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

36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), and Rule 111 (Kern, Tulare, Kings). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (11/15/01); 4601, sections 5.1, 5.2, 5.3, 5.8 and 8.0 (10/31/01); 8021 (11/15/01); 8031 (11/15/01); 8041 (11/15/01); 8051 (11/15/01); 8061 (11/15/01); and 8071 (11/15/01). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. On November 30, 2004, the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report are based upon this initial permit issuance date, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-72-1-3

**EXPIRATION DATE:** 06/30/2009

**EQUIPMENT DESCRIPTION:**

ANIMAL RENDERING OPERATION INCLUDING A RAW MATERIAL RECEIVING OPERATION EQUIPPED WITH ONE (1) 195' X 175' OUTDOOR RAW MATERIAL UNLOADING CONCRETE SLAB, ONE (1) PRE-BREAKER, ONE RAW MATERIAL CONVEYANCE SCREW SYSTEM, ONE (1) 3,500 LB CAPACITY FEED HOPPER SERVING COOKERS #2 AND #3, AND A PERMIT EXEMPT WASTE WATER LAGOON SYSTEM (DAILY EMISSIONS LESS THAN 2 LBS VOC/DAY)

## PERMIT UNIT REQUIREMENTS

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1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
3. All equipment shall be maintained and operated according to the specifications and plans contained in the permit application except as otherwise specified herein. [District NSR Rule] Federally Enforceable Through Title V Permit
4. All equipment or systems installed or used to achieve compliance with the terms and conditions of this permit shall be maintained in good working order and be operated as efficiently as possible to minimize air pollution emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The Air Pollution Control District shall be immediately notified of any breakdown or malfunction that reduces or disrupts the normal processing of odors required by this permit. [District Rule 4102]
6. The District shall have authority to investigate possible odors alleged to originate from the facility and to make a determination of whether or not a nuisance exists, either in response to a complaint or on its own initiative. [District Rules 1070 and 4102] Federally Enforceable Through Title V Permit
7. The APCO or any authorized representative shall have access to inspect any equipment, operation, records, method required in this permit, to sample emissions from the source or require samples to be taken, or perform any other actions to assure compliance with the requirements of this permit and all District rules and regulations. [District Rule 1070] Federally Enforceable Through Title V Permit
8. The premises of the plant shall be kept clean and free from spillage of raw or finished materials, refuse, and standing pools of water which may present a nuisance condition. All raw material spills shall be cleaned up immediately. [District Rule 4102]
9. Delivery trucks shall be unloaded within 2 hours of entering the property. [District Rule 4102]
10. No storage of raw materials outside of the 195' x 175' unloading pit slab area is permitted. [District NSR Rule and Rule 4102] Federally Enforceable Through Title V Permit
11. Trucks waiting their turn to unload within the 2 hour unload time limitation are not considered storage outside of the 195' x 175' pit slab area. [District Rule 4102]
12. All trucks and truck tires delivering raw material shall be washed clean of raw material and raw material residue prior to exiting the facility premises in order to minimize trackout of raw material or raw material residue. [District Rule 4102]

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

13. All raw material trucks shall be maintained in condition to prevent leakage of any solid or liquid material. [District Rule 4102]
14. The rendering plant shall not be operated unless the odor control system is operating and in full use. [District NSR Rule] Federally Enforceable Through Title V Permit
15. Total facility raw material process rate shall not exceed 1,392,000 pounds (696 tons) per day or 331,128,000 pounds (165,564 tons) per year. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
16. Except during periods of equipment breakdown as determined by the District under Rule 1100, all material received shall be processed within 24 hours of receipt. Raw material shall be monitored to ensure that processing is performed within this time limit using feedstock records and plant output records. [District Rules 1100 and 4102]
17. If raw material cannot be processed within 24 hours of receipt, raw material shall be diverted to other facilities. No further deliveries shall be received until a 24 hour turnaround for raw material is achievable. [District Rule 4102]
18. The owner and/or operator shall comply with all the provisions of District Rule 4102, Nuisance. [District Rule 4102]
19. Permittee shall keep daily and annual records of the amount of raw material received. [District Rule 2201] Federally Enforceable Through Title V Permit
20. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made readily available for District inspection upon request. [District Rules 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-72-3-10

**EXPIRATION DATE:** 06/30/2009

**EQUIPMENT DESCRIPTION:**

ANIMAL RENDERING OPERATION INCLUDING MEAT AND BONE MEAL COOKING OPERATION WITH ONE (1) HOGGER, ONE SCREEN SCREW AND CONVEYANCE SCREW SYSTEM, ONE (1) BACKUP CLARIFIER, ONE (1) CENTRIFUGE, THREE (3) PRESSORS, EIGHTEEN (18) FAT, YELLOW GREASE, AND TALLOW TANKS, AND THREE (3) DUPPS MODEL 1200 COOKERS SERVED BY ONE 10 MMBTU/HR SPENCER THERMAL OXIDIZER/AFTERBURNER SERIAL #1295 AND ONE 250 HP HURST WASTEHEAT RECOVERY BOILER

## PERMIT UNIT REQUIREMENTS

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1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. All equipment shall be maintained and operated according to the specifications and plans contained in the permit application except as otherwise specified herein. [District NSR Rule] Federally Enforceable Through Title V Permit
3. All equipment or systems installed or used to achieve compliance with the terms and conditions of this permit shall be maintained in good working order and be operated as efficiently as possible to minimize air pollution emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The Air Pollution Control District shall be immediately notified of any breakdown or malfunction that reduces or disrupts the normal processing of odors required by this permit. [District Rule 4102]
5. The District shall have authority to investigate possible odors alleged to originate from the facility and to make a determination of whether or not a nuisance exists, either in response to a complaint or on its own initiative. [District Rules 1070 and 4102] Federally Enforceable Through Title V Permit
6. The APCO or any authorized representative shall have access to inspect any equipment, operation, records, method required in this permit, to sample emissions from the source or require samples to be taken, or perform any other actions to assure compliance with the requirements of this permit and all District rules and regulations. [District Rule 1070] Federally Enforceable Through Title V Permit
7. The rendering plant shall not be operated unless the odor control system is operating and in full use. [District NSR Rule] Federally Enforceable Through Title V Permit
8. The premises of the plant shall be kept clean and free from spillage of raw or finished materials, refuse, and standing pools of water which may present a nuisance condition. All raw material spills shall be cleaned up immediately. [District Rule 4102]
9. All non-condensable emissions and vapors shall be incinerated in the thermal oxidizer at a minimum temperature of 1200 degrees F and a minimum retention time of 0.57 seconds. [District Rules 4102 and 4104] Federally Enforceable Through Title V Permit
10. Incineration temperature shall be monitored by a continuously recording temperature device. [District NSR Rule and District Rules 4102 and 4104] Federally Enforceable Through Title V Permit
11. Thermocouple installed at the rear of the thermal oxidizer shall provide accurate temperature readings of flue gas. An audible alarm shall be installed to alert facility personnel to low temperature readings. [District NSR Rule and District Rules 4102 and 4104] 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. If the District determines that the combustion of yellow grease is causing a nuisance then the facility must cease combustion of this product in the thermal oxidizer/afterburner. [District Rule 4102]
13. The sulfur content of the diesel fuel used shall not exceed 0.0015% by weight. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
15. The thermal oxidizer shall be fired only by PUC quality natural gas or yellow grease as primary fuels or diesel as backup fuel. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Diesel fuel shall only be used whenever natural gas and yellow grease are not available. [District NSR Rule] Federally Enforceable Through Title V Permit
17. The amount of Diesel used as fuel in the thermal oxidizer shall not exceed 504 gallons per day. [District NSR Rule] Federally Enforceable Through Title V Permit
18. Emissions from the thermal oxidizer shall not exceed any of the following limits: 0.59 lb-NO<sub>x</sub>/MMBtu, 0.015 lb-VOC/MMBtu, 0.25 lb-SO<sub>x</sub>/MMBtu, 0.7 lb-CO/MMBtu, or 0.16 lb-PM<sub>10</sub>/MMBtu. All emissions measurements shall be averaged over a period of 15 minutes. [District NSR Rule] Federally Enforceable Through Title V Permit
19. NO<sub>x</sub> emissions as a result of firing this thermal oxidizer using any combination of the permitted fuels shall not exceed either of the following limits: 141.6 lb NO<sub>x</sub>/day or 51,684 lb NO<sub>x</sub>/year. [District NSR Rule] Federally Enforceable Through Title V Permit
20. VOC emissions as a result of firing this thermal oxidizer using any combination of the permitted fuels shall not exceed 3.6 lb VOC/day. [District NSR Rule] Federally Enforceable Through Title V Permit
21. SO<sub>x</sub> emissions as a result of firing this thermal oxidizer using any combination of the permitted fuels shall not exceed 60.0 lb SO<sub>x</sub>/day. [District NSR Rule] Federally Enforceable Through Title V Permit
22. CO emissions as a result of firing this thermal oxidizer using any combination of the permitted fuels shall not exceed 168.0 lb CO/day. [District NSR Rule] Federally Enforceable Through Title V Permit
23. PM<sub>10</sub> emissions as a result of firing this thermal oxidizer using any combination of the permitted fuels shall not exceed 38.4 lb PM<sub>10</sub>/day. [District NSR Rule] Federally Enforceable Through Title V Permit
24. Daily or annual NO<sub>x</sub> emissions are calculated as follows: Total pounds of NO<sub>x</sub> emissions = 0.0006 X cubic feet (Natural Gas) + 0.08 X gallon (Yellow Grease) + 0.08 X gallon (Diesel). [District NSR Rule] Federally Enforceable Through Title V Permit
25. Daily VOC emissions are calculated as follows: Total pounds of VOC emissions = 1.5E-05X cubic feet (Natural Gas) + 0.0020 X gallon (Yellow Grease) + 0.0021 X gallon (Diesel). [District NSR Rule] Federally Enforceable Through Title V Permit
26. Daily SO<sub>x</sub> emissions are calculated as follows: Total pounds of SO<sub>x</sub> emissions = 2.5E-04 X cubic feet (Natural Gas) + 0.033 X gallon (Yellow Grease) + 0.034 X gallon (Diesel). [District NSR Rule] Federally Enforceable Through Title V Permit
27. Daily CO emissions are calculated as follows: Total pounds of CO emissions = 7.0E-04 X cubic feet (Natural Gas) + 0.091 X gallon (Yellow Grease) + 0.096 X gallon (Diesel). [District NSR Rule] Federally Enforceable Through Title V Permit
28. Daily PM<sub>10</sub> emissions are calculated as follows: Total pounds of PM<sub>10</sub> emissions = 1.6E-04 X cubic feet (Natural Gas) + 0.021 X gallon (Yellow Grease) + 0.022 X gallon (Diesel). [District NSR Rule] Federally Enforceable Through Title V Permit
29. Initial source testing shall be required for yellow grease within 60 days of initial use of this fuel. The District shall be notified upon initial usage of the this fuel. The initial source test for yellow grease shall be conducted to determine compliance with the NO<sub>x</sub>, CO, VOC, PM<sub>10</sub>, and SO<sub>x</sub> emissions. [District NSR Rule] Federally Enforceable Through Title V Permit

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

30. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
31. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
32. Source testing to measure concentrations of oxides of nitrogen shall be conducted using EPA Method 19 for NOx emission rate (lb/MMBtu). [District Rule 1081] Federally Enforceable Through Title V Permit
33. Source testing to measure concentrations of carbon monoxide (CO) shall be conducted using EPA Method 10 or CARB Method 100. [District Rule 1081] Federally Enforceable Through Title V Permit
34. Source testing to measure the stack gas oxygen shall be conducted using EPA Methods 3 or 3A, or CARB Method 100. [District Rule 1081] Federally Enforceable Through Title V Permit
35. Source testing to measure concentrations of volatile organic compounds (VOC) shall be conducted using EPA methods 18 or 25, or CARB method 100. [District Rule 1081] Federally Enforceable Through Title V Permit
36. Source testing to measure concentrations of oxides of sulfur (SOx) as SO2 shall be conducted using EPA Methods 6 or 8, or CARB Method 100. [District Rule 1081] Federally Enforceable Through Title V Permit
37. Source testing to measure concentrations of PM10 shall be conducted using EPA Method 201 and 202, or EPA Method 201a and 202, or CARB Method 501 and 5. [District Rule 1081] Federally Enforceable Through Title V Permit
38. Source testing to measure concentrations of total particulate emissions shall be conducted using CARB Method 5. [District Rule 1081] Federally Enforceable Through Title V Permit
39. In lieu of performing a source test for PM10, the results of the total particulate test may be used for compliance with the PM10 emissions limit. If this option is used, then all of the particulate emissions will be considered to be PM10. [District Rule 1081] Federally Enforceable Through Title V Permit
40. The stack concentration of NOx (as NO2), CO, and O2 shall be measured at least on a monthly basis using District approved portable analyzers for any fuel fired during the period since the prior monthly test. Operating on a fuel for testing purposes only need not be performed, provided compliance with emission limits was shown for that fuel during the previous monthly test. [District Rule 1081] Federally Enforceable Through Title V Permit
41. Concentration measurements shall not be taken until the sample acquisition probe has been exposed to the stack gas for at least 150% of the response time. Measurements shall be taken in triplicate. [District Rule 1081] Federally Enforceable Through Title V Permit
42. A non-resettable, totalizing volumetric fuel flow meter shall be utilized to measure the cubic feet of natural gas combusted in the thermal oxidizer. [District NSR Rule] Federally Enforceable Through Title V Permit
43. A separate non-resettable, totalizing liquid fuel flow meter shall be utilized to measure the gallons of yellow grease combusted in the thermal oxidizer. [District NSR Rule] Federally Enforceable Through Title V Permit
44. A separate non-resettable, totalizing liquid fuel flow meter shall be utilized to measure the gallons of diesel fuel combusted in the thermal oxidizer. [District NSR Rule] Federally Enforceable Through Title V Permit
45. The thermal oxidizer temperature shall be monitored by a continuously recording temperature device. [District NSR Rule] Federally Enforceable Through Title V Permit
46. Records of the daily and annual amounts of Natural Gas, Yellow Grease, and Diesel fuels combusted in the thermal oxidizer and of the sulfur content of the diesel fuel shall be maintained. [District NSR Rule] Federally Enforceable Through Title V Permit
47. Emissions from the cookers must be vented to, and condensed in, the air-to-air condensers. [District NSR Rule] Federally Enforceable Through Title V Permit
48. Emissions from the hot crax holding bin and the crax transfer screw must be vented to the 16" 2D-2D cyclone, and then to the thermal oxidizer. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

49. Emissions from the condensers must be vented to the 24" 2D-2D cyclone, and then to the thermal oxidizer. [District NSR Rule] Federally Enforceable Through Title V Permit
50. Emissions from the presses, tallow work tanks, bird machine, screen screw, over press screw, hogger, wet crax transfer elevators, and tallow elevator must be vented to the 36" 2D-2D cyclone and then to the thermal oxidizer. [District NSR Rule] Federally Enforceable Through Title V Permit
51. All non-condensibles from the condensers and vapors from the presses, tallow work tanks, bird machine, screen screw, press screw, hogger, transfer screw, bins and elevators shall be incinerated in the thermal oxidizer at all times during operation. [District NSR Rule] Federally Enforceable Through Title V Permit
52. The owner and/or operator shall comply with all the provisions of District Rule 4102, Nuisance. [District Rule 4102]
53. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made readily available for District inspection upon request. [District Rules 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-72-6-1

**EXPIRATION DATE:** 06/30/2009

**EQUIPMENT DESCRIPTION:**

ONE 1,000 GALLON ABOVEGROUND STORAGE TANK SERVED BY PHASE I VAPOR RECOVERY SYSTEM (G-70-142-A) WITH ONE (1) EMCO-WHEATON GASOLINE DISPENSING NOZZLE

## PERMIT UNIT REQUIREMENTS

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1. The vapor recovery systems and their components shall be installed, operated, and maintained in accordance with the State certification requirements. [District Rules 4621, 4622, and 1081] Federally Enforceable Through Title V Permit
2. Total gasoline throughput for the facility shall not exceed either of the following: 10,000 gallons in any consecutive 30-day period or 24,000 gallons per calendar year. Records shall be maintained to demonstrate compliance with these limits. [District Rule 4622] Federally Enforceable Through Title V Permit
3. Records of monthly gasoline throughput shall be maintained, retained on the premises for at least five years and made available for District inspection upon request. [District Rule 4622] Federally Enforceable Through Title V Permit
4. Aboveground storage tank(s) shall be equipped with pressure/vacuum valves set to within 10 percent of the maximum working pressure of the tank. [District Rule 4621] 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: C-72-7-7

EXPIRATION DATE: 06/30/2009

## EQUIPMENT DESCRIPTION:

39.5 MMBTU/HR ERIE CITY IRON WORKS MODEL 95355 NATURAL GAS OR YELLOW GREASE-FIRED BOILER WITH A TODD MODEL RMB ULTRA LOW NOX BURNER AND FORCED DRAFT FLUE GAS RECIRCULATION SYSTEM

## PERMIT UNIT REQUIREMENTS

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1. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320]
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% CO<sub>2</sub>, nor 10 lb/hr. [District Rule 4201 and District Rule 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
4. Unit shall be fired on PUC-regulated natural gas or on yellow grease. [District Rule 4301, 5.2.1 and 40 CFR § 60.42c(d)] Federally Enforceable Through Title V Permit
5. If the District determines that the combustion of yellow grease is causing a nuisance then the facility must cease combustion of this product in the boiler. [District Rule 4102]
6. Operator shall ensure that all required source testing conforms to the compliance testing procedures described in District Rule 1081. [District Rule 1081] Federally Enforceable Through Title V Permit
7. Operator shall record all dates on which the unit is fired on any fuel other than PUC-regulated natural gas. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
8. Operator shall maintain copies of fuel invoices and supplier certifications. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
9. On and after July 1, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320]
10. Operator shall provide that fuel hhv be certified by third party fuel supplier or determined annually by: ASTM D 240 or D 2382 for liquid hydrocarbon fuels; ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.3.2; 4305, 6.2.1; 4306, 6.2.1; and 4351, 6.2.1] Federally Enforceable Through Title V Permit
11. Operator shall monitor and record for each unit the hhv and cumulative annual use of each fuel. [District Rules 4305, 6.1.1; 4306, 6.1.1 and District Rule 4351, 6.1.1] Federally Enforceable Through Title V Permit
12. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: SJVUAPCD Rule 4801. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

13. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rule 4201 and 4301. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
14. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rule 4305, Sec. 4.2, 5.1.1, 5.1.2., 5.4, 6.1.1, 6.2 (excepting 6.2.3), 6.3, 8.1 and Rule 4351 Sec 4.2, 5.2.2.1, 5.2.2.2, 6.1.1, 6.2 (excepting 6.2.3), 8.1. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
15. The requirements of 40 CFR 72.6(b) are not applicable because this is not an affected unit under the acid rain provisions. The requirements of 40 CFR 60.40c do not apply to this source because it is not used to produce electricity for sale. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
16. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
17. Nitrogen oxide (NO<sub>x</sub>) emission concentrations in ppmv referenced at dry stack emissions shall be corrected to 3% O<sub>2</sub> and lb/MMBtu rates shall be calculated as lb NO<sub>2</sub>/MMBtu of heat input (hhv). [District Rule 4305, 8.1 and 4351, 8.1] Federally Enforceable Through Title V Permit
18. When calculating NO<sub>x</sub> emission limit for natural gas based on heat input (lb/MMBtu), fuel hhv shall be certified by third party supplier or ASTM D 1826-88 or D 1945-81 in conjunction with ASTM D 3588-89. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
19. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
20. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the unit shall be installed, utilized and maintained. Volumetric flow measurements shall be periodically compensated for temperature and pressure. [District NSR Rule and District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
21. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of yellow grease combusted in the unit shall be installed, utilized and maintained. Volumetric flow measurements shall be periodically compensated for temperature and pressure. [District NSR Rule and District Rule 4305 and 4306] Federally Enforceable Through Title V Permit
22. The amount of yellow grease combusted in the unit shall not exceed any of the following limits: 5,028 gallons per day or 1,735,082 gallons per year. [District NSR Rule] Federally Enforceable Through Title V Permit
23. When fired on natural gas, emissions rates from the unit shall not exceed any of the following limits: 9 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.011 lb-NO<sub>x</sub>/MMBtu, 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, 200 ppmvd CO @ 3% O<sub>2</sub> or 0.146 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District NSR Rule and District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
24. When fired on yellow grease, emissions rates from the unit shall not exceed any of the following limits: 40 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.052 lb-NO<sub>x</sub>/MMBtu, 0.002 lb-SO<sub>x</sub>/MMBtu, 0.016 lb-PM<sub>10</sub>/MMBtu, 200 ppmvd CO @ 3% O<sub>2</sub> or 0.166 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District NSR Rule and District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
25. The amount of NO<sub>x</sub> emissions from this unit as a result of firing any combination of permitted fuels shall not exceed any of the following limits: 34.1 lb-NO<sub>x</sub> per day or 12,457 lb-NO<sub>x</sub> per year. [District NSR Rule] Federally Enforceable Through Title V Permit
26. Annual and daily NO<sub>x</sub> emissions shall be calculated as: [(1.1E-05 lb-NO<sub>x</sub>/scf) x (amount of natural gas usage in scf) + (7.2E-03 lb-NO<sub>x</sub>/gal) x (amount of yellow grease usage in gallons)]. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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27. VOC emissions as a result of firing this boiler using any combination of the permitted fuels shall not exceed 5.2 lb VOC/day. [District NSR Rule] Federally Enforceable Through Title V Permit
28. Ongoing compliance with the daily VOC emissions limit is calculated as follows: Total pounds of VOC emissions =  $5.5E-06 \times$  cubic feet (Natural Gas) +  $0.0007 \times$  gallon (Yellow Grease). [District NSR Rule] Federally Enforceable Through Title V Permit
29. SO<sub>x</sub> emissions as a result of firing this boiler using any combination of the permitted fuels shall not exceed 2.7 lb SO<sub>x</sub>/day. [District NSR Rule] Federally Enforceable Through Title V Permit
30. Ongoing compliance with the daily SO<sub>x</sub> emissions limit is calculated as follows: Total pounds of SO<sub>x</sub> emissions =  $2.9E-06 \times$  cubic feet (Natural Gas). [District NSR Rule] Federally Enforceable Through Title V Permit
31. CO emissions as a result of firing this boiler using any combination of the permitted fuels shall not exceed 140.3 lb CO/day. [District NSR Rule] Federally Enforceable Through Title V Permit
32. Ongoing compliance with the daily CO emissions limit is calculated as follows: Total CO emissions =  $1.48E-04 \times$  cubic feet (Natural Gas) +  $0.022 \times$  gallon (Yellow Grease). [District NSR Rule] Federally Enforceable Through Title V Permit
33. PM<sub>10</sub> emissions as a result of firing this boiler using any combination of the permitted fuels shall not exceed 14.2 lb PM<sub>10</sub>/day. [District NSR Rule] Federally Enforceable Through Title V Permit
34. Ongoing compliance with the daily PM<sub>10</sub> emissions limit is calculated as follows: Total pounds of PM<sub>10</sub> emissions =  $7.6E-06 \times$  cubic feet (Natural Gas) +  $0.0022 \times$  gallon (Yellow Grease). [District NSR Rule] Federally Enforceable Through Title V Permit
35. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
36. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
37. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
38. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
39. Concentration measurements shall not be taken until the sample acquisition probe has been exposed to the stack gas for at least 150% of the response time. Measurements shall be taken in triplicate. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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40. If water vapor is not removed prior to measurement, the absolute humidity in the gas stream must be determined so that the gas concentrations may be reported on a dry basis. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
41. If water vapor creates an interference with the measurement of any component, then the water vapor must be removed from the gas stream prior to concentration measurements. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
42. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
43. Source testing to measure natural gas-combustion NO<sub>x</sub> and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
44. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
45. Source testing to measure yellow grease combustion NO<sub>x</sub> and CO emissions from this unit shall be conducted if the amount of yellow grease combusted exceeds 29,877 gallons during the previous 12 months from the date of the proposed source test. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District NSR Rule and District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
46. The source plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
47. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
48. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
49. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
50. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
51. Source testing to measure concentrations of volatile organic compounds (VOC) shall be conducted using EPA methods 18 or 25, or CARB method 100. [District NSR Rule] Federally Enforceable Through Title V Permit
52. Source testing to measure concentrations of oxides of sulfur (SO<sub>x</sub>) as SO<sub>2</sub> shall be conducted using EPA Methods 6 or 8, or CARB Method 100. [District NSR Rule] Federally Enforceable Through Title V Permit
53. Source testing to measure concentrations of PM<sub>10</sub> shall be conducted using EPA Method 201 and 202, or EPA Method 201a and 202. [District NSR Rule] Federally Enforceable Through Title V Permit
54. In lieu of performing a source test for PM<sub>10</sub>, the results of the total particulate test may be used for compliance with the PM<sub>10</sub> emissions limit. If this option is used, then all of the particulate emissions will be considered to be PM<sub>10</sub>. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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55. Source testing to measure concentrations of total particulate emissions shall be conducted using CARB Method 5. [District NSR Rule] Federally Enforceable Through Title V Permit
56. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
57. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
58. The permittee shall maintain records of daily, monthly, and annual yellow grease usage and the dates the unit operated on yellow grease. [District NSR Rule and District Rule 1070] Federally Enforceable Through Title V Permit
59. The permittee shall maintain records of daily, monthly, and annual natural gas usage. [District NSR Rule] Federally Enforceable Through Title V Permit
60. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and Rule 4320]
61. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070; 2520, 9.4.2; 4305, and 4306] 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:** C-72-8-1

**EXPIRATION DATE:** 06/30/2009

**EQUIPMENT DESCRIPTION:**

37.8 MMBTU/HR HURST MODEL SERIES 500 NATURAL GAS/YELLOW GREASE-FIRED BOILER EQUIPPED WITH JOHN ZINC/GORDON PIATT ULTRA LOW-NOX BURNER MODEL RMB-GO-90-E2-30-F9H WITH FORCED FGR

## PERMIT UNIT REQUIREMENTS

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1. Pursuant to Rule 4320, beginning in 2010 the operator shall pay an annual emission fee to the District for NOx emissions from this unit for the previous calendar year. Payments are due by July 1 of each year. Payments shall continue annually until either the unit is permanently removed from service in the District or the operator demonstrates compliance with the applicable NOx emission limit listed in Rule 4320. [District Rule 4320]
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. If the District determines that the combustion of yellow grease is causing a nuisance then the facility must cease combustion of this product in the boiler. [District Rule 4102] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% CO<sub>2</sub>, nor 10 lb/hr. [District Rule 4201 and District Rule 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
5. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
6. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The boiler shall only be fired by PUC grade natural gas or yellow grease as primary fuels, with fuel oil #2 as backup. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Unit shall be fired on PUC-regulated natural gas, yellow grease, or on diesel fuel not exceeding 0.05 % sulfur by weight. [District Rule 4301, 5.2.1 and 40 CFR § 60.42c(d)] Federally Enforceable Through Title V Permit
9. This unit shall only be fired on fuel oil #2 (Diesel) during natural gas curtailment for no more than 168 cumulative hours in a calendar year plus 48 hours per calendar year for equipment testing. [District Rule 4306] Federally Enforceable Through Title V Permit
10. A non-resettable, totalizing volumetric fuel flow meter shall be utilized to measure the cubic feet of natural gas combusted in the boiler. [District Rule 2201] Federally Enforceable Through Title V Permit
11. A separate non-resettable, totalizing liquid fuel flow meter to measure, in gallons, the yellow grease combusted in the boiler shall be utilized. [District Rule 2201] Federally Enforceable Through Title V Permit
12. A separate non-resettable, totalizing liquid fuel flow meter shall be utilized to measure the gallons of Fuel Oil #2 (Diesel) combusted in the boiler. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Natural gas consumption shall not exceed 771,264 scf per day. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
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14. The maximum amount of yellow grease combusted shall not exceed 3,914 gallons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The amount of Fuel Oil #2 (Diesel) used as fuel in the boiler shall not exceed either of the following limits: 1,448 gallons per day or 13,031 gallons per year. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Operator shall provide that fuel hhv be certified by third party fuel supplier or determined annually by: ASTM D 240 or D 2382 for liquid hydrocarbon fuels; ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.3.2; 4305, 6.2.1; 4306, 6.2.1; and 4351, 6.2.1] Federally Enforceable Through Title V Permit
17. Emissions shall not exceed any of the following limits when fired on natural gas: 9 ppmv NOx @ 3% O2 (0.011 lb NOx/MMBtu), 0.00285 lb SOx/MMBtu, 0.0076 lb PM10/MMBtu, 175 ppmv CO @ 3% O2 (0.1295 lb CO/MMBtu), or 0.0042 lb VOC/MMBtu. All emissions measurements shall be averaged over a period of 15 minutes. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Emissions shall not exceed any of the following limits when fired on yellow grease: 40 ppmv NOx @ 3% O2 (0.0546 lb NOx/MMBtu), 0.002 lb SOx/MMBtu, 0.016 lb PM10/MMBtu, 200 ppmv CO @ 3% O2 (0.166 lb CO/MMBtu) or 0.0056 lb VOC/MMBtu. All emissions measurements shall be averaged over a period of 15 minutes. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Emissions shall not exceed any of the following limits when fired on Fuel Oil #2: 19.2 lb NOx/1,000 gal, 7.1 lb SOx/1,000 gal, 2.0 lb PM10/1,000 gal, 5.5 lb CO/1,000 gal, or 0.137 lb VOC/1,000 gal. All emissions measurements shall be averaged over a period of 15 minutes. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Ongoing compliance with the daily or annual NOx emissions limit is calculated as follows: Total pounds of NOx emissions =  $1.1E-05 \times \text{cubic feet (Natural Gas)} + 0.0072 \times \text{gallon (Yellow Grease)} + 0.0192 \times \text{gallon (Fuel Oil \#2)}$ . [District Rules 2201, 4305 and 4306] Federally Enforceable Through Title V Permit
21. NOx emissions as a result of firing this boiler using any combination of Natural Gas, Yellow Grease and Fuel Oil #2 shall not exceed either of the following: 27.8 lb NOx/day or 10,147 lb NOx/year. [District Rules 2201, 4305 and 4306] Federally Enforceable Through Title V Permit
22. VOC emissions as a result of firing this boiler using any combination of Natural Gas, Yellow Grease and Fuel Oil #2 shall not exceed 3.2 lb VOC/day. [District Rule 2201] Federally Enforceable Through Title V Permit
23. SOx emissions as a result of firing this boiler using any combination of Natural Gas, Yellow Grease and Fuel Oil #2 shall not exceed 10.3 lb SOx/day. [District Rule 2201] Federally Enforceable Through Title V Permit
24. CO emissions as a result of firing this boiler using any combination of Natural Gas, Yellow Grease and Fuel Oil #2 shall not exceed 99.9 lb CO/day. [District Rule 2201] Federally Enforceable Through Title V Permit
25. PM10 emissions as a result of firing this boiler using any combination of Natural Gas, Yellow Grease and Fuel Oil #2 shall not exceed 8.2 lb PM10/day. [District Rule 2201] Federally Enforceable Through Title V Permit
26. If the unit has a heat input capacity greater than 30 MMBtu/hr, and is at any time fired on oil, the operator shall, while fired on oil, limit the opacity of any discharged gases to 20% opacity (6 minute average) except for one 6 minute period per hour of not more than 27% opacity; Method 9 shall be used for determining the opacity of stack emissions at annual inspections while firing on diesel fuel. [40 CFR § 60.43c (c)(d) and 60.45c(a)(7)] Federally Enforceable Through Title V Permit
27. Nitrogen oxide (NOx) emission concentrations in ppmv referenced at dry stack emissions shall be corrected to 3% O2 and lb/MMBtu rates shall be calculated as lb NO2/MMBtu of heat input (hhv). [District Rules 4305, 8.1, Rule 4306, 8.1 and 4351, 8.1] Federally Enforceable Through Title V Permit
28. If the unit is fired on diesel fuel that is not supplier-certified 0.05% sulfur content or less, then the sulfur content of the fuel being fired in the unit shall be determined using ASTM method D 1072, D 3031, D 4084 or D 3246. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
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29. If the unit is fired on diesel fuel that is not supplier-certified 0.05% sulfur content or less, the sulfur content of each fuel source shall be tested weekly, except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be semi-annually. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
30. Operator shall maintain copies of fuel invoices and supplier certifications. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
31. On and after July 1, 2010, the permittee shall submit an analysis showing the fuel's sulfur content at least once every year. Valid purchase contracts, supplier certifications, tariff sheets, or transportation contracts may be used to satisfy this requirement, provided they establish the fuel parameters mentioned above. [District Rule 4320]
32. Operator shall record all dates on which the unit is fired on any fuel other than PUC-regulated natural gas. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
33. Operator shall monitor and record for each unit the hhv and cumulative annual use of each fuel. [District Rules 4305, 6.1.1, 4306, 6.1.1 and District Rule 4351, 6.1.1] Federally Enforceable Through Title V Permit
34. Operator shall maintain all records for at least five years and conform to the recordkeeping requirements described in District Rule 2520. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
35. Operator shall ensure that all required source testing conforms to the compliance testing procedures described in District Rule 1081. [District Rule 1081, and County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), and 110 (Madera)] Federally Enforceable Through Title V Permit
36. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
37. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
38. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
39. Source testing to measure NO<sub>x</sub> and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
40. If the unit is fired on both natural gas and Yellow Grease during any calendar year, additional source testing for NO<sub>x</sub> and CO emissions shall be performed for any fuel that is fired for more than 100 hours during that calendar year and has not been previously tested as a part of the facility's annual source testing requirement. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
41. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
42. Source testing shall be required for the combustion of yellow grease (if the amount of yellow grease combusted exceeds 29,877 gallons during the 12 months from the anniversary date of the source test). [District Rules 2201, 4305 and 4306] Federally Enforceable Through Title V Permit
43. Source testing to measure concentrations of oxides of nitrogen (as NO<sub>2</sub>, ppmv) shall be conducted using EPA Method 7E or CARB Method 100; EPA Method 19 for NO<sub>x</sub> emission rate (lb/MMBtu). [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
44. Source testing to measure concentrations of carbon monoxide (CO) shall be conducted using EPA Method 10 or CARB Method 100. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
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45. Source testing to measure the stack gas oxygen shall be conducted using EPA Methods 3 or 3A, or CARB Method 100. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
46. Source testing to measure concentrations of oxides of sulfur (SOx) as SO2 shall be conducted using EPA Methods 6 or 8, or CARB Method 100. [District Rule 2201] Federally Enforceable Through Title V Permit
47. Source testing to measure concentrations of PM10 shall be conducted using EPA Method 201 and 202, or EPA Method 201a and 202, or CARB Method 501 and 5. [District Rule 2201] Federally Enforceable Through Title V Permit
48. In lieu of performing a source test for PM10, the results of the total particulate test may be used for compliance with the PM10 emissions limit. If this option is used, then all of the particulate emissions will be considered to be PM10. [District Rule 2201] Federally Enforceable Through Title V Permit
49. Source testing to measure concentrations of total particulate emissions shall be conducted using CARB Method 5. [District Rule 2201] Federally Enforceable Through Title V Permit
50. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
51. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
52. The permittee shall monitor and record the stack concentration of NOx, CO, and O2 at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
53. If either the NOx or CO concentrations corrected to 3% O2, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
54. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
55. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 3% O2, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306] 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.

56. If the unit is fired on back-up fuel for a period exceeding 48 cumulative hours in a calendar year, the permittee shall monitor and record the stack concentration of NO<sub>x</sub> at least once during that year using an APCO approved portable NO<sub>x</sub> analyzer. Monitoring for back-up fuel NO<sub>x</sub> emissions shall not be required when the unit is operating on primary fuel, i.e. the unit need not be fired on back-up fuel solely to perform monitoring. [District Rule 4306] Federally Enforceable Through Title V Permit
57. Back-up fuel NO<sub>x</sub> emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4306] Federally Enforceable Through Title V Permit
58. The permittee shall maintain records of: (1) the date and time of back-up fuel NO<sub>x</sub> measurements, (2) the measured back-up fuel NO<sub>x</sub> concentration (in ppmv or lb/MMBtu) corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4306] Federally Enforceable Through Title V Permit
59. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 1081, 4201, 4301, and 4801. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
60. The requirements of 40 CFR 72.6(b) are not applicable because this is not an affected unit under the acid rain provisions. The requirements of 40 CFR 60.40c do not apply to this source because it is not used to produce electricity for sale. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
61. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rule 4305, Sec. 4.2, 5.1.1, 5.1.2., 5.4, 6.1.1, 6.2 (excepting 6.2.3), 6.3, 8.1 and Rule 4351 Sec 4.2, 5.2.2.1, 5.2.2.2, 6.1.1, 6.2 (excepting 6.2.3), 8.1. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
62. The permittee shall maintain records of daily consumption of natural gas. [District Rule 1070] Federally Enforceable Through Title V Permit
63. The permittee shall maintain records of dates the boiler operated on yellow grease and the daily and annual amount of yellow grease that was combusted in the boiler (in gallons). [District Rule 1070] Federally Enforceable Through Title V Permit
64. The permittee shall maintain records of daily and annual amount of fuel oil that was combusted in the boiler (in gallons). [District Rule 1070] Federally Enforceable Through Title V Permit
65. Permittee shall maintain records of annual heat input (MMBtu) for this unit on a calendar year basis. Such records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070 and Rule 4320]
66. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-72-9-1

**EXPIRATION DATE:** 06/30/2009

**EQUIPMENT DESCRIPTION:**

MEAT AND BONE MEAL STORAGE AND LOADOUT SYSTEM EQUIPPED WITH ONE (1) GRINDER, ONE (1) ELEVATOR, THREE (3) TRANSFER CONVEYORS, ONE FINISHED MATERIAL CONVEYANCE SCREW SYSTEM AND TWO (2) MEAT AND BONE MEAL BINS

## PERMIT UNIT REQUIREMENTS

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1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. All equipment shall be maintained and operated according to the specifications and plans contained in the permit application except as otherwise specified herein. [District NSR Rule] Federally Enforceable Through Title V Permit
3. All equipment or systems installed or used to achieve compliance with the terms and conditions of this permit shall be maintained in good working order and be operated as efficiently as possible to minimize air pollution emissions. [District NSR Rule] Federally Enforceable Through Title V Permit
4. The Air Pollution Control District shall be immediately notified of any breakdown or malfunction that reduces or disrupts the normal processing of odors required by this permit. [District Rule 4102]
5. The District shall have authority to investigate possible odors alleged to originate from the facility and to make a determination of whether or not a nuisance exists, either in response to a complaint or on its own initiative. [District Rules 1070 and 4102] Federally Enforceable Through Title V Permit
6. The APCO or any authorized representative shall have access to inspect any equipment, operation, records, method required in this permit, to sample emissions from the source or require samples to be taken, or perform any other actions to assure compliance with the requirements of this permit and all District rules and regulations. [District Rule 1070] Federally Enforceable Through Title V Permit
7. Total meat and bone meal loaded into delivery trucks shall not exceed 346,000 pounds (173 tons) per day or 82,344,000 (41,172 tons) per year. [District NSR Rule and District Rule 4102] Federally Enforceable Through Title V Permit
8. Daily emissions from the meat and bone meal (MBM) handling operation shall not exceed 0.4 lb PM10/day. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Tallow and yellow grease storage tanks shall be kept in good operating condition. These tanks shall not contribute to a nuisance condition. [District Rule 4102]
10. Permittee shall keep daily and annual records of the amount of meat and bone meal produced. [District NSR Rule] Federally Enforceable Through Title V Permit
11. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made readily available for District inspection upon request. [District Rules 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

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# ATTACHMENT C

Detailed Facility List

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**Detailed Facility Report**  
For Facility=72  
Sorted by Facility Name and Permit Number

BAKER COMMODITIES, INC 16801 W JENSEN AVE KERMAN, CA 93630	FAC # STATUS: TELEPHONE:	C 72 A (209) 846-9393	TYPE: TOXIC ID:	TitleV 41255	EXPIRE ON: AREA: INSP. DATE:	06/30/2009 3 / 308 09/10
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PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
C-72-1-3	1240 HP RENDERING PLANT	3020-01 G	1	815.00	815.00	A	ANIMAL RENDERING OPERATION INCLUDING A RAW MATERIAL RECEIVING OPERATION EQUIPPED WITH ONE (1) 195' X 175' OUTDOOR RAW MATERIAL UNLOADING CONCRETE SLAB, ONE (1) PRE-BREAKER, ONE RAW MATERIAL CONVEYANCE SCREW SYSTEM, ONE (1) 3,500 LB CAPACITY FEED HOPPER SERVING COOKERS #2 AND #3, AND A PERMIT EXEMPT WASTE WATER LAGOON SYSTEM (DAILY EMISSIONS LESS THAN 2 LBS VOC/DAY)
C-72-2-6	39 MMBtu/hr	3020-02 H	1	1,030.00	1,030.00	D	39 MMBTU/HR BABCOCK & WILCOX STEAM BOILER #1 MODEL #1944, WITH GORDON-PIATT LOW-NOX GAS BURNERS AND FLUE GAS RECIRCULATION (FGR), FIRED BY NATURAL GAS AND YELLOW GREASE AS ALTERNATE PRIMARY FUELS
C-72-3-10	10 MMBTU/HR THERMAL OXIDIZER	3020-02 G	1	815.00	815.00	A	ANIMAL RENDERING OPERATION INCLUDING MEAT AND BONE MEAL COOKING OPERATION WITH ONE (1) HOGGER, ONE SCREEN SCREW AND CONVEYANCE SCREW SYSTEM, ONE (1) BACKUP CLARIFIER, ONE (1) CENTRIFUGE, THREE (3) PRESSORS, EIGHTEEN (18) FAT, YELLOW GREASE, AND TALLOW TANKS, AND THREE (3) DUPPS MODEL 1200 COOKERS SERVED BY ONE 10 MMBTU/HR SPENCER THERMAL OXIDIZER/AFTERBURNER SERIAL #1295 AND ONE 250 HP HURST WASTEHEAT RECOVERY BOILER
C-72-6-1	NOZZLE	3020-11 A	1	34.00	34.00	A	ONE 1,000 GALLON ABOVEGROUND STORAGE TANK SERVED BY PHASE I VAPOR RECOVERY SYSTEM (G-70-142-A) WITH ONE (1) EMCO-WHEATON GASOLINE DISPENSING NOZZLE
C-72-7-7	39.5 MMBTU/HR BOILER	3020-02 H	1	1,030.00	1,030.00	A	39.5 MMBTU/HR ERIE CITY IRON WORKS MODEL 95355 NATURAL GAS OR YELLOW GREASE-FIRED BOILER WITH A TODD MODEL RMB ULTRA LOW NOX BURNER AND FORCED DRAFT FLUE GAS RECIRCULATION SYSTEM
C-72-8-1	37,800 KBTU/HR BOILER	3020-02 H	1	1,030.00	1,030.00	A	37.8 MMBTU/HR HURST MODEL SERIES 500 NATURAL GAS/YELLOW GREASE-FIRED BOILER EQUIPPED WITH JOHN ZINC/GORDON PIATT ULTRA LOW-NOX BURNER MODEL RMB-GO-90-E2-30-F9H WITH FORCED FGR
C-72-9-1	200 electrical HP	3020-01 E	1	412.00	412.00	A	MEAT AND BONE MEAL STORAGE AND LOADOUT SYSTEM EQUIPPED WITH ONE (1) GRINDER, ONE (1) ELEVATOR, THREE (3) TRANSFER CONVEYORS, ONE FINISHED MATERIAL CONVEYANCE SCREW SYSTEM AND TWO (2) MEAT AND BONE MEAL BINS

Number of Facilities Reported: 1

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# ATTACHMENT D

AUTHORITY TO CONSTRUCT PERMITS

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**San Joaquin Valley**  
AIR POLLUTION CONTROL DISTRICT

**AUTHORITY TO CONSTRUCT**

**PERMIT NO:** C-72-3-6

**ISSUANCE DATE:** 03/12/2007

**LEGAL OWNER OR OPERATOR:** BAKER COMMODITIES, INC  
**MAILING ADDRESS:** PO BOX 416  
KERMAN, CA 93630

**LOCATION:** 16801 W JENSEN AVE  
KERMAN, CA 93630

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF ONE 10 MMBTU/HR SPENCER NATURAL GAS, YELLOW GREASE, AND FUEL OIL NO. 2 (AS BACKUP) FIRED THERMAL OXIDIZER/AFTERBURNER SERIAL #1295 AND ONE 250 HP HERCULES WASTEHEAT RECOVERY BOILER AS THE CONTROL DEVICE OF THE RENDERING PLANT WHEREIN VAPORS AND NON-CONDENSIBLES ARE INCINERATED: ALLOW USE OF DENATURED YELLOW GREASE (YELLOW GREASE BLENDED WITH UP TO 1.0% FUEL OIL NO. 2 CONTENT BY VOLUME) AS FUEL

**CONDITIONS**

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. All equipment shall be constructed, maintained and operated according to the specifications and plans contained in the permit application except as otherwise specified herein. [District NSR Rule] Federally Enforceable Through Title V Permit
3. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. If the District determines that the combustion of yellow grease or denatured yellow grease is causing a nuisance then the facility must cease combustion of this product in the thermal oxidizer/afterburner. [District Rule 4102]
5. The APCO or any authorized representative, upon request, shall have access to inspect any equipment, operation, or method required in this permit, and to sample emissions from the source or require samples to be taken. [District Rule 1081] Federally Enforceable Through Title V Permit
6. All non-condensable vapors shall be incinerated in the thermal oxidizer at all times during operation at a minimum temperature of 1,200 degrees F and retention time of at least 0.57 second. [District NSR Rule and District Rule 4104] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 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.

Sayed Sadredin, Executive Director / APCO

  
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DAVID WARNER, Director of Permit Services

C-72-3-6 : Mar 20 2007 1:54PM - CLERIODB Joint Inspection NOT Required

7. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
8. The thermal oxidizer shall only be fired by PUC-regulated natural gas, yellow grease, or denatured yellow grease as primary fuels, with fuel oil No. 2 (diesel) as backup. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Denatured yellow grease is yellow grease blended with fuel oil No. 2, not to exceed 1.0% fuel oil No. 2 by volume. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Permittee shall maintain records of the gallons of fuel oil and yellow grease blended to make the denatured yellow grease fuel. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Except for diesel fuel used to make denatured yellow grease, diesel fuel shall only be used whenever natural gas, yellow grease, and denatured yellow grease are not available. [District NSR Rule] Federally Enforceable Through Title V Permit
12. The sulfur content of the diesel fuel used shall not exceed 0.05% by weight. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The amount of Diesel used as fuel in the thermal oxidizer shall not exceed 504 gallons per day. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Emissions from the thermal oxidizer shall not exceed any of the following limits: 0.59 lb-NO<sub>x</sub>/MMBtu, 0.015 lb-VOC/MMBtu, 0.25 lb-SO<sub>x</sub>/MMBtu, 0.7 lb-CO/MMBtu, or 0.16 lb-PM<sub>10</sub>/MMBtu. All emissions measurements shall be averaged over a period of 15 minutes. [District NSR Rule] Federally Enforceable Through Title V Permit
15. NO<sub>x</sub> emissions as a result of firing this thermal oxidizer using any combination of the permitted fuels shall not exceed either of the following limits: 141.6 lb NO<sub>x</sub>/day or 51,684 lb NO<sub>x</sub>/year. [District NSR Rule] Federally Enforceable Through Title V Permit
16. VOC emissions as a result of firing this thermal oxidizer using any combination of the permitted fuels shall not exceed 3.6 lb VOC/day. [District NSR Rule] Federally Enforceable Through Title V Permit
17. SO<sub>x</sub> emissions as a result of firing this thermal oxidizer using any combination of the permitted fuels shall not exceed 60.0 lb SO<sub>x</sub>/day. [District NSR Rule] Federally Enforceable Through Title V Permit
18. CO emissions as a result of firing this thermal oxidizer using any combination of the permitted fuels shall not exceed 168.0 lb CO/day. [District NSR Rule] Federally Enforceable Through Title V Permit
19. PM<sub>10</sub> emissions as a result of firing this thermal oxidizer using any combination of the permitted fuels shall not exceed 38.4 lb PM<sub>10</sub>/day. [District NSR Rule] Federally Enforceable Through Title V Permit
20. Daily or annual NO<sub>x</sub> emissions are calculated as follows: Total pounds of NO<sub>x</sub> emissions = 0.0006 X cubic feet (Natural Gas) + 0.08 X gallon (Yellow Grease/Denatured Yellow Grease) + 0.08 X gallon (Diesel). [District NSR Rule] Federally Enforceable Through Title V Permit
21. Daily VOC emissions are calculated as follows: Total pounds of VOC emissions = 1.5E-05X cubic feet (Natural Gas) + 0.0020 X gallon (Yellow Grease/Denatured Yellow Grease) + 0.0021 X gallon (Diesel). [District NSR Rule] Federally Enforceable Through Title V Permit
22. Daily SO<sub>x</sub> emissions are calculated as follows: Total pounds of SO<sub>x</sub> emissions = 2.5E-04 X cubic feet (Natural Gas) + 0.033 X gallon (Yellow Grease/Denatured Yellow Grease) + 0.034 X gallon (Diesel). [District NSR Rule] Federally Enforceable Through Title V Permit
23. Daily CO emissions are calculated as follows: Total pounds of CO emissions = 7.0E-04 X cubic feet (Natural Gas) + 0.091 X gallon (Yellow Grease/Denatured Yellow Grease) + 0.096 X gallon (Diesel). [District NSR Rule] Federally Enforceable Through Title V Permit
24. Daily PM<sub>10</sub> emissions are calculated as follows: Total pounds of PM<sub>10</sub> emissions = 1.6E-04 X cubic feet (Natural Gas) + 0.021 X gallon (Yellow Grease/Denatured Yellow Grease) + 0.022 X gallon (Diesel). [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

25. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
26. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
27. Source testing to measure concentrations of oxides of nitrogen shall be conducted using EPA Method 19 for NOx emission rate (lb/MMBtu). [District Rule 1081] Federally Enforceable Through Title V Permit
28. Source testing to measure concentrations of carbon monoxide (CO) shall be conducted using EPA Method 10 or CARB Method 100. [District Rule 1081] Federally Enforceable Through Title V Permit
29. Source testing to measure the stack gas oxygen shall be conducted using EPA Methods 3 or 3A, or CARB Method 100. [District Rule 1081] Federally Enforceable Through Title V Permit
30. Source testing to measure concentrations of volatile organic compounds (VOC) shall be conducted using EPA methods 18 or 25, or CARB method 100. [District Rule 1081] Federally Enforceable Through Title V Permit
31. Source testing to measure concentrations of oxides of sulfur (SOx) as SO2 shall be conducted using EPA Methods 6 or 8, or CARB Method 100. [District Rule 1081] Federally Enforceable Through Title V Permit
32. Source testing to measure concentrations of PM10 shall be conducted using EPA Method 201 and 202, or EPA Method 201a and 202, or CARB Method 501 and 5. [District Rule 1081] Federally Enforceable Through Title V Permit
33. Source testing to measure concentrations of total particulate emissions shall be conducted using CARB Method 5. [District Rule 1081] Federally Enforceable Through Title V Permit
34. In lieu of performing a source test for PM10, the results of the total particulate test may be used for compliance with the PM10 emissions limit. If this option is used, then all of the particulate emissions will be considered to be PM10. [District Rule 1081] Federally Enforceable Through Title V Permit
35. The stack concentration of NOx (as NO2), CO, and O2 shall be measured at least on a monthly basis using District approved portable analyzers for any fuel fired during the period since the prior monthly test. Operating on a fuel for testing purposes only need not be performed, provided compliance with emission limits was shown for that fuel during the previous monthly test. [District Rule 1081] Federally Enforceable Through Title V Permit
36. Concentration measurements shall not be taken until the sample acquisition probe has been exposed to the stack gas for at least 150% of the response time. Measurements shall be taken in triplicate. [District Rule 1081] Federally Enforceable Through Title V Permit
37. A non-resettable, totalizing volumetric fuel flow meter shall be utilized to measure the cubic feet of natural gas combusted in the thermal oxidizer. [District NSR Rule] Federally Enforceable Through Title V Permit
38. A separate non-resettable, totalizing liquid fuel flow meter shall be utilized to measure the gallons of yellow grease (and denatured yellow grease) combusted in the thermal oxidizer. [District NSR Rule] Federally Enforceable Through Title V Permit
39. A separate non-resettable, totalizing liquid fuel flow meter shall be utilized to measure the gallons of diesel fuel combusted in the thermal oxidizer. [District NSR Rule] Federally Enforceable Through Title V Permit
40. The thermal oxidizer temperature shall be monitored by a continuously recording temperature device. [District NSR Rule and District Rule 4104] Federally Enforceable Through Title V Permit
41. Records of the daily and annual amounts of Natural Gas, Yellow Grease, Denatured Yellow Grease, and Diesel fuels combusted in the thermal oxidizer and of the sulfur content of the diesel fuel shall be maintained, retained on the premises for at least five years, and made available for District inspection on request. [District Rule 1070] Federally Enforceable Through Title V Permit



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

**AUTHORITY TO CONSTRUCT**

**PERMIT NO:** C-72-7-6

**ISSUANCE DATE:** 03/12/2007

**LEGAL OWNER OR OPERATOR:** BAKER COMMODITIES, INC  
**MAILING ADDRESS:** PO BOX 416  
 KERMAN, CA 93630

**LOCATION:** 16801 W JENSEN AVE  
 KERMAN, CA 93630

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 39.5 MMBTU/HR ERIE CITY IRON WORKS MODEL 95355 NATURAL GAS AND YELLOW GREASE-FIRED BOILER WITH A TODD MODEL RMB ULTRA LOW NOX BURNER AND FORCED DRAFT FLUE GAS RECIRCULATION SYSTEM: ALLOW USE OF DENATURED YELLOW GREASE (YELLOW GREASE BLENDED WITH UP TO 1.0% FUEL OIL NO. 2 CONTENT BY VOLUME) AS FUEL

**CONDITIONS**

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. Authority to Construct C-72-7-4 shall be implemented concurrently or prior to the modification authorized by this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
4. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. If the District determines that the combustion of yellow grease or denatured yellow grease is causing a nuisance then the facility must cease combustion of this product in the boiler. [District Rule 4102]
6. Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% CO2, nor 10 lb/hr. [District Rule 4201 and District Rule 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
7. This boiler shall only be fired on PUC-regulated natural gas, yellow grease, or denatured yellow grease. [District NSR Rule and District Rule 4301, 5.2.1 and 40 CFR § 60.42c(d)] Federally Enforceable Through Title V Permit
8. Denatured yellow grease is yellow grease blended with fuel oil No. 2, not to exceed 1.0% fuel oil No.2 by volume. [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 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 Sagredin, Executive Director / APCO

*David Warner*  
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 DAVID WARNER, Director of Permit Services

C-72-7-6 Mar 29 2007 1:54PM - CLER/COB Joint Inspection NOT Required

9. Permittee shall maintain records of the gallons of fuel oil and yellow grease blended to make the denatured yellow grease fuel. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Operator shall record all dates on which the unit is fired on any fuel other than PUC-regulated natural gas. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
11. Operator shall maintain copies of fuel invoices and supplier certifications. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
12. Operator shall provide that fuel hhv be certified by third party fuel supplier or determined annually by: ASTM D 240 or D 2382 for liquid hydrocarbon fuels; ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.3.2; 4305, 6.2.1; 4306, 6.2.1; and 4351, 6.2.1] Federally Enforceable Through Title V Permit
13. Operator shall monitor and record for each unit the hhv and cumulative annual use of each fuel. [District Rules 4305, 6.1.1; 4306, 6.1.1; and 4351, 6.1.1] Federally Enforceable Through Title V Permit
14. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of natural gas combusted in the unit shall be utilized and maintained. Volumetric flow measurements shall be periodically compensated for temperature and pressure. [District NSR Rule and District Rules 4305 and 4306, 5.4.1] Federally Enforceable Through Title V Permit
15. A non-resettable, totalizing mass or volumetric fuel flow meter to measure the amount of yellow grease (and denatured yellow grease) combusted in the unit shall be utilized and maintained. Volumetric flow measurements shall be periodically compensated for temperature and pressure. [District NSR Rule and District Rule 4305 and 4306, 5.4.1] Federally Enforceable Through Title V Permit
16. The combined amount of yellow grease and denatured yellow grease combusted in the unit shall not exceed any of the following limits: 4,736 gallons per day or 1,730,139 gallons per year. [District NSR Rule] Federally Enforceable Through Title V Permit
17. When fired on natural gas, emissions rates from the unit shall not exceed any of the following limits: 9 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.011 lb-NO<sub>x</sub>/MMBtu, 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, 200 ppmvd CO @ 3% O<sub>2</sub> or 0.146 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District NSR Rule and District Rules 4305 and 4306, 5.1] Federally Enforceable Through Title V Permit
18. When fired on yellow grease or denatured yellow grease, emissions rates from the unit shall not exceed any of the following limits: 40 ppmvd NO<sub>x</sub> @ 3% O<sub>2</sub> or 0.052 lb-NO<sub>x</sub>/MMBtu, 0.002 lb-SO<sub>x</sub>/MMBtu, 0.016 lb-PM<sub>10</sub>/MMBtu, 200 ppmvd CO @ 3% O<sub>2</sub> or 0.166 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District NSR Rule and District Rules 4305 and 4306, 5.1] Federally Enforceable Through Title V Permit
19. The amount of NO<sub>x</sub> emissions from this unit as a result of firing any combination of permitted fuels shall not exceed any of the following limits: 34.1 lb-NO<sub>x</sub> per day or 12,457 lb-NO<sub>x</sub> per year. [District NSR Rule] Federally Enforceable Through Title V Permit
20. Annual and daily NO<sub>x</sub> emissions shall be calculated as:  $[(1.1E-05 \text{ lb-NO}_x/\text{scf}) \times (\text{amount of natural gas usage in scf}) + (7.2E-03 \text{ lb-NO}_x/\text{gal}) \times (\text{amount of yellow grease usage in gallons})]$ . [District NSR Rule] Federally Enforceable Through Title V Permit
21. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306, 5.4.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

22. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306, 5.4.2] Federally Enforceable Through Title V Permit
23. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305 and 4306, 5.4.2] Federally Enforceable Through Title V Permit
24. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306, 5.4.2] Federally Enforceable Through Title V Permit
25. Operator shall ensure that all required source testing conforms to the compliance testing procedures described in District Rule 1081. [District Rule 1081] Federally Enforceable Through Title V Permit
26. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
27. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306, 5.5.1] Federally Enforceable Through Title V Permit
28. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305 and 4306, 5.5.5] Federally Enforceable Through Title V Permit
29. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
30. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
31. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305 and 4306, 5.5.2] Federally Enforceable Through Title V Permit
32. Source testing to measure NO<sub>x</sub> and CO combustion emissions from this boiler while firing on denatured yellow grease shall be conducted within 60 days of initial firing on denatured yellow grease. [District NSR Rule and District Rules 4102, 4305 and 4306, 6.3.1] Federally Enforceable Through Title V Permit
33. Source testing to measure natural gas combustion NO<sub>x</sub> and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305 and 4306, 6.3.1] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

34. Source testing to measure yellow grease combustion NO<sub>x</sub> and CO emissions from this unit shall be performed within 60 days of the combined amount of yellow grease and denatured yellow grease usage exceeding 29,877 gallons during any rolling 12-month period unless compliance with yellow grease NO<sub>x</sub> and CO emissions has been demonstrated within 12 months prior to the date of the exceedance. After demonstrating compliance on two (2) consecutive source tests when the unit is fired on yellow grease, the unit shall be tested within 60 days of the combined amount of yellow grease and denatured yellow grease usage exceeding 29,877 gallons during any rolling 12-month period unless compliance with yellow grease NO<sub>x</sub> and CO emissions has been demonstrated within 36 months prior to the date of the exceedance. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to the rolling 12-month period according to the requirements described above. [District NSR Rule and District Rules 4305 and 4306, 6.3.1] Federally Enforceable Through Title V Permit
35. NO<sub>x</sub> emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305 and 4306, 6.2.2 and 6.2.5] Federally Enforceable Through Title V Permit
36. Nitrogen oxide (NO<sub>x</sub>) emission concentrations in ppmv referenced at dry stack emissions shall be corrected to 3% O<sub>2</sub> and lb/MMBtu rates shall be calculated as lb NO<sub>2</sub>/MMBtu of heat input (hhv). [District Rule 4305, 8.1 and 4351, 8.1] Federally Enforceable Through Title V Permit
37. When calculating NO<sub>x</sub> emission limit for natural gas based on heat input (lb/MMBtu), fuel hhv shall be certified by third party supplier or ASTM D 1826-88 or D 1945-81 in conjunction with ASTM D 3588-89. [District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
38. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305 and 4306, 6.2.3] Federally Enforceable Through Title V Permit
39. Stack gas oxygen (O<sub>2</sub>) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305 and 4306, 6.2.4] Federally Enforceable Through Title V Permit
40. Source testing to measure concentrations of volatile organic compounds (VOC) shall be conducted using EPA methods 18 or 25, or CARB method 100. [District NSR Rule] Federally Enforceable Through Title V Permit
41. Source testing to measure concentrations of oxides of sulfur (SO<sub>x</sub>) as SO<sub>2</sub> shall be conducted using EPA Methods 6 or 8, or CARB Method 100. [District NSR Rule] Federally Enforceable Through Title V Permit
42. Source testing to measure concentrations of PM<sub>10</sub> shall be conducted using EPA Method 201 and 202, or EPA Method 201a and 202. [District NSR Rule] Federally Enforceable Through Title V Permit
43. In lieu of performing a source test for PM<sub>10</sub>, the results of the total particulate test may be used for compliance with the PM<sub>10</sub> emissions limit. If this option is used, then all of the particulate emissions will be considered to be PM<sub>10</sub>. [District NSR Rule] Federally Enforceable Through Title V Permit
44. Source testing to measure concentrations of total particulate emissions shall be conducted using CARB Method 5. [District NSR Rule] Federally Enforceable Through Title V Permit
45. The permittee shall maintain records of daily, monthly, and annual yellow grease and denatured yellow grease usage and the dates the unit operated on yellow grease or denatured yellow grease. [District NSR Rule and District Rule 1070] Federally Enforceable Through Title V Permit
46. The permittee shall maintain records of daily, monthly, and annual natural gas usage. [District NSR Rule] Federally Enforceable Through Title V Permit
47. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070; 2520, 9.4.2; 4305, and 4306, 6.1] Federally Enforceable Through Title V Permit
48. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following subsumed requirements: SJVUAPCD Rule 4801. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

49. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rule 4201 and 4301. A permit shield is granted from these requirements. [District Rule 2520, 13.2]  
Federally Enforceable Through Title V Permit
50. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rule 4305, Sec. 4.2, 5.1.1, 5.1.2,, 5.4, 6.1.1, 6.2 (excepting 6.2.3), 6.3, 8.1 and Rule 4351 Sec 4.2, 5.2.2.1, 5.2.2.2, 6.1.1, 6.2 (excepting 6.2.3), 8.1. A permit shield is granted from these requirements. [District Rule 2520, 13.2]  
Federally Enforceable Through Title V Permit
51. The requirements of 40 CFR 72.6(b) are not applicable because this is not an affected unit under the acid rain provisions. The requirements of 40 CFR 60.40c do not apply to this source because it is not used to produce electricity for sale. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit



**San Joaquin Valley**  
AIR POLLUTION CONTROL DISTRICT

**AUTHORITY TO CONSTRUCT**

**PERMIT NO:** C-72-8-3

**ISSUANCE DATE:** 03/12/2007

**LEGAL OWNER OR OPERATOR:** BAKER COMMODITIES, INC  
**MAILING ADDRESS:** PO BOX 416  
KERMAN, CA 93630

**LOCATION:** 16801 W JENSEN AVE  
KERMAN, CA 93630

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 37.8 MMBTU/HR HURST MODEL SERIES 500 NATURAL GAS, YELLOW GREASE, AND FUEL OIL NO. 2 (AS BACK-UP) FIRED BOILER WITH JOHN ZINC/GORDON PIATT ULTRA LOW-NOX BURNER MODEL RMB-GO-90-E2-30-F9H AND FORCED DRAFT FLUE GAS RECIRCULATION: ALLOW USE OF DENATURED YELLOW GREASE (YELLOW GREASE BLENDED WITH UP TO 1.0% FUEL OIL NO. 2 CONTENT BY VOLUME) AS FUEL

**CONDITIONS**

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
3. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. If the District determines that the combustion of yellow grease or denatured yellow grease is causing a nuisance then the facility must cease combustion of this product in the boiler. [District Rule 4102]
5. Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% CO<sub>2</sub>, nor 10 lb/hr. [District Rule 4201 and District Rule 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
6. The boiler shall only be fired by PUC-regulated natural gas, yellow grease, or denatured yellow grease as primary fuels, with fuel oil #2 (diesel) as backup. [District NSR Rule and District Rule 4301, 5.2.1 and 40 CFR § 60.42c(d)] Federally Enforceable Through Title V Permit
7. Denatured yellow grease is yellow grease blended with fuel oil No. 2, not to exceed 1.0% fuel oil No.2 by volume. [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 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

*P. Warner*  
DAVID WARNER, Director of Permit Services

C-72-8-3 Mar 20 2007 1:54PM - CLERICOB : Joint Inspection NOT Required

8. Permittee shall maintain records of the gallons of fuel oil and yellow grease blended to make the denatured yellow grease fuel. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Except for diesel fuel used to make denatured yellow grease, this unit shall only be fired on fuel oil #2 (diesel) during natural gas curtailment for no more than 168 cumulative hours in a calendar year plus 48 hours per calendar year for equipment testing. [District NSR Rule and District Rule 4306, 4.2.1] Federally Enforceable Through Title V Permit
10. The sulfur content of the diesel fuel used shall not exceed 0.05% by weight. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Natural gas consumption shall not exceed 771,264 scf per day. [District NSR Rule] Federally Enforceable Through Title V Permit
12. The combined amount of yellow grease and denatured yellow grease combusted in this boiler shall not exceed 3,914 gallons per day. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The amount of Fuel Oil #2 (Diesel) used as fuel in the boiler shall not exceed either of the following limits: 1,448 gallons per day or 13,031 gallons per year. [District NSR Rule] Federally Enforceable Through Title V Permit
14. A non-resettable, totalizing volumetric fuel flow meter shall be utilized to measure the cubic feet of natural gas combusted in the boiler. [District NSR Rule and District Rules 4305 and 4306, 5.4.1] Federally Enforceable Through Title V Permit
15. A separate non-resettable, totalizing liquid fuel flow meter to measure, in gallons, the yellow grease (and denatured yellow grease) combusted in the boiler shall be utilized. [District NSR Rule and District Rules 4305 and 4306, 5.4.1] Federally Enforceable Through Title V Permit
16. A separate non-resettable, totalizing liquid fuel flow meter shall be utilized to measure the gallons of Fuel Oil #2 (Diesel) combusted in the boiler. [District NSR Rule and District Rule 4306, 4.2.1] Federally Enforceable Through Title V Permit
17. Operator shall provide that fuel hhv be certified by third party fuel supplier or determined annually by: ASTM D 240 or D 2382 for liquid hydrocarbon fuels; ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rule 2520, 9.3.2; 4305, 6.2.1; 4306, 6.2.1; and 4351, 6.2.1] Federally Enforceable Through Title V Permit
18. Emissions shall not exceed any of the following limits when fired on natural gas: 9 ppmv NO<sub>x</sub> @ 3% O<sub>2</sub> (0.011 lb NO<sub>x</sub>/MMBtu), 0.00285 lb SO<sub>x</sub>/MMBtu, 0.0076 lb PM<sub>10</sub>/MMBtu, 175 ppmv CO @ 3% O<sub>2</sub> (0.1295 lb CO/MMBtu), or 0.0042 lb VOC/MMBtu. All emissions measurements shall be averaged over a period of 15 minutes. [District NSR Rule and District Rules 4305 and 4306, 5.1] Federally Enforceable Through Title V Permit
19. Emissions shall not exceed any of the following limits when fired on yellow grease or denatured yellow grease: 40 ppmv NO<sub>x</sub> @ 3% O<sub>2</sub> (0.0546 lb NO<sub>x</sub>/MMBtu), 0.002 lb SO<sub>x</sub>/MMBtu, 0.016 lb PM<sub>10</sub>/MMBtu, 200 ppmv CO @ 3% O<sub>2</sub> (0.166 lb CO/MMBtu) or 0.0056 lb VOC/MMBtu. All emissions measurements shall be averaged over a period of 15 minutes. [District NSR Rule and District Rules 4305 and 4306, 5.1] Federally Enforceable Through Title V Permit
20. Emissions shall not exceed any of the following limits when fired on Fuel Oil #2: 19.2 lb NO<sub>x</sub>/1,000 gal (0.140 lb-NO<sub>x</sub>/MMBtu), 7.1 lb SO<sub>x</sub>/1,000 gal, 2.0 lb PM<sub>10</sub>/1,000 gal, 5.5 lb CO/1,000 gal, or 0.137 lb VOC/1,000 gal. All emissions measurements shall be averaged over a period of 15 minutes. [District NSR Rule and District Rule 4306, 4.2.2] Federally Enforceable Through Title V Permit
21. Ongoing compliance with the daily or annual NO<sub>x</sub> emissions limit is calculated as follows: Total pounds of NO<sub>x</sub> emissions = 1.1E-05 X cubic feet (Natural Gas) + 0.0071 X gallon (Yellow Grease and Denatured Yellow Grease) + 0.0192 X gallon (Fuel Oil #2). [District NSR Rule and District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
22. NO<sub>x</sub> emissions as a result of firing this boiler using any combination of Natural Gas, Yellow Grease, Denatured Yellow Grease, and Fuel Oil #2 shall not exceed either of the following: 27.8 lb NO<sub>x</sub>/day or 3,642 lb NO<sub>x</sub>/year. [District NSR Rule and District Rules 4305 and 4306] Federally Enforceable Through Title V Permit
23. VOC emissions as a result of firing this boiler using any combination of Natural Gas, Yellow Grease, Denatured Yellow Grease, and Fuel Oil #2 shall not exceed 3.2 lb VOC/day. [District NSR Rule] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

24. SOx emissions as a result of firing this boiler using any combination of Natural Gas, Yellow Grease, Denatured Yellow Grease, and Fuel Oil #2 shall not exceed 10.3 lb SOx/day. [District NSR Rule] Federally Enforceable Through Title V Permit
25. CO emissions as a result of firing this boiler using any combination of Natural Gas, Yellow Grease, Denatured Yellow Grease, and Fuel Oil #2 shall not exceed 99.9 lb CO/day. [District NSR Rule] Federally Enforceable Through Title V Permit
26. PM10 emissions as a result of firing this boiler using any combination of Natural Gas, Yellow Grease, Denatured Yellow Grease, and Fuel Oil #2 shall not exceed 8.2 lb PM10/day. [District NSR Rule] Federally Enforceable Through Title V Permit
27. If the unit has a heat input capacity greater than 30 MMBtu/hr, and is at any time fired on oil, the operator shall, while fired on oil, limit the opacity of any discharged gases to 20% opacity (6 minute average) except for one 6 minute period per hour of not more than 27% opacity; Method 9 shall be used for determining the opacity of stack emissions at annual inspections while firing on diesel fuel. [40 CFR § 60.43c (c)(d) and 60.45c(a)(7)] Federally Enforceable Through Title V Permit
28. If the unit is fired on diesel fuel that is not supplier-certified 0.05% sulfur content or less, then the sulfur content of the fuel being fired in the unit shall be determined using ASTM method D 1072, D 3031, D 4084 or D 3246. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
29. If the unit is fired on diesel fuel that is not supplier-certified 0.05% sulfur content or less, the sulfur content of each fuel source shall be tested weekly, except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be semi-annually. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
30. Operator shall maintain copies of fuel invoices and supplier certifications. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
31. Operator shall record all dates on which the unit is fired on any fuel other than PUC-regulated natural gas. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
32. Operator shall monitor and record for each unit the hhv and cumulative annual use of each fuel. [District Rules 4305, 6.1.1, 4306, 6.1.1 and District Rule 4351, 6.1.1] Federally Enforceable Through Title V Permit
33. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
34. Operator shall ensure that all required source testing conforms to the compliance testing procedures described in District Rule 1081. [District Rule 1081, and County Rules 108 (Kings), 108.1 (Fresno, Merced, San Joaquin, Tulare, Kern, and Stanislaus), and 110 (Madera)] Federally Enforceable Through Title V Permit
35. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305 and 4306, 5.5.1] Federally Enforceable Through Title V Permit
36. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305 and 4306, 5.5.5] Federally Enforceable Through Title V Permit
37. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
38. Source testing to measure NOx and CO combustion emissions from this boiler while firing on denatured yellow grease shall be conducted within 60 days of initial firing on denatured yellow grease. [District NSR Rule and District Rules 4102, 4305 and 4306, 6.3.1] Federally Enforceable Through Title V Permit
39. Source testing to measure natural gas combustion NOx and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305 and 4306, 6.3.1] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

40. Source testing to measure yellow grease combustion NO<sub>x</sub> and CO emissions from this unit shall be performed within 60 days of the combined amount of yellow grease and denatured yellow grease usage exceeding 29,958 gallons during any rolling 12-month period unless compliance with yellow grease NO<sub>x</sub> and CO emissions has been demonstrated within 12 months prior to the date of the exceedance. After demonstrating compliance on two (2) consecutive source tests when the unit is fired on yellow grease, the unit shall be tested within 60 days of the combined amount of yellow grease and denatured yellow grease usage exceeding 29,958 gallons during any rolling 12-month period unless compliance with yellow grease NO<sub>x</sub> and CO emissions has been demonstrated within 36 months prior to the date of the exceedance. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to the rolling 12-month period according to the requirements described above. [District NSR Rule and District Rules 4305 and 4306, 6.3.1] Federally Enforceable Through Title V Permit
41. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
42. Source testing to measure concentrations of oxides of nitrogen (as NO<sub>2</sub>, ppmv) shall be conducted using EPA Method 7E or CARB Method 100; EPA Method 19 for NO<sub>x</sub> emission rate (lb/MMBtu). [District Rules 4305 and 4306, 6.2.2 and 6.2.5] Federally Enforceable Through Title V Permit
43. Nitrogen oxide (NO<sub>x</sub>) emission concentrations in ppmv referenced at dry stack emissions shall be corrected to 3% O<sub>2</sub> and lb/MMBtu rates shall be calculated as lb NO<sub>2</sub>/MMBtu of heat input (hhv). [District Rules 4305, 8.1, Rule 4306, 8.1 and 4351, 8.1] Federally Enforceable Through Title V Permit
44. Source testing to measure concentrations of carbon monoxide (CO) shall be conducted using EPA Method 10 or CARB Method 100. [District Rules 4305 and 4306, 6.2.3] Federally Enforceable Through Title V Permit
45. Source testing to measure the stack gas oxygen shall be conducted using EPA Methods 3 or 3A, or CARB Method 100. [District Rules 4305 and 4306, 6.2.4] Federally Enforceable Through Title V Permit
46. Source testing to measure concentrations of oxides of sulfur (SO<sub>x</sub>) as SO<sub>2</sub> shall be conducted using EPA Methods 6 or 8, or CARB Method 100. [District NSR Rule] Federally Enforceable Through Title V Permit
47. Source testing to measure concentrations of PM<sub>10</sub> shall be conducted using EPA Method 201 and 202, or EPA Method 201a and 202, or CARB Method 501 and 5. [District NSR Rule] Federally Enforceable Through Title V Permit
48. In lieu of performing a source test for PM<sub>10</sub>, the results of the total particulate test may be used for compliance with the PM<sub>10</sub> emissions limit. If this option is used, then all of the particulate emissions will be considered to be PM<sub>10</sub>. [District NSR Rule] Federally Enforceable Through Title V Permit
49. Source testing to measure concentrations of total particulate emissions shall be conducted using CARB Method 5. [District NSR Rule] Federally Enforceable Through Title V Permit
50. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305 and 4306, 5.5.2] Federally Enforceable Through Title V Permit
51. The permittee shall monitor and record the stack concentration of NO<sub>x</sub>, CO, and O<sub>2</sub> at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305 and 4306, 5.4.2] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

52. If either the NO<sub>x</sub> or CO concentrations corrected to 3% O<sub>2</sub>, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305 and 4306, 5.4.2] Federally Enforceable Through Title V Permit
53. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305 and 4306, 5.4.2] Federally Enforceable Through Title V Permit
54. The permittee shall maintain records of: (1) the date and time of NO<sub>x</sub>, CO, and O<sub>2</sub> measurements, (2) the O<sub>2</sub> concentration in percent and the measured NO<sub>x</sub> and CO concentrations corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305 and 4306, 5.4.2] Federally Enforceable Through Title V Permit
55. If the unit is fired on back-up fuel (i.e. diesel) for a period exceeding 48 cumulative hours in a calendar year, the permittee shall monitor and record the stack concentration of NO<sub>x</sub> at least once during that year using an APCO approved portable NO<sub>x</sub> analyzer. Monitoring for back-up fuel NO<sub>x</sub> emissions shall not be required when the unit is operating on primary fuel, i.e. the unit need not be fired on back-up fuel solely to perform monitoring. [District Rule 4306, 6.1.1] Federally Enforceable Through Title V Permit
56. Back-up fuel NO<sub>x</sub> emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the permit-to-operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4306, 6.1.1] Federally Enforceable Through Title V Permit
57. The permittee shall maintain records of: (1) the date and time of back-up fuel NO<sub>x</sub> measurements, (2) the measured back-up fuel NO<sub>x</sub> concentration (in ppmv or lb/MMBtu) corrected to 3% O<sub>2</sub>, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4306, 6.1.1] Federally Enforceable Through Title V Permit
58. The permittee shall maintain records of daily consumption of natural gas. [District NSR Rule and District Rule 1070] Federally Enforceable Through Title V Permit
59. The permittee shall maintain records of dates the boiler operated on yellow grease or denatured yellow grease and the daily and annual amount of yellow grease and denatured yellow grease that was combusted in the boiler (in gallons). [District NSR Rule and District Rule 1070] Federally Enforceable Through Title V Permit
60. The permittee shall maintain records of daily and annual amount of fuel oil that was combusted in the boiler (in gallons). [District NSR Rule and District Rule 1070] Federally Enforceable Through Title V Permit
61. The permittee shall monitor and record the cumulative annual hours of operation when fired on fuel oil No. 2 during natural gas curtailment and testing. [District Rules 4305 and 4306, 6.1.1] Federally Enforceable Through Title V Permit
62. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, and 4306, 6.1] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

63. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rules 1081, 4201, 4301, and 4801. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
64. The requirements of 40 CFR 72.6(b) are not applicable because this is not an affected unit under the acid rain provisions. The requirements of 40 CFR 60.40c do not apply to this source because it is not used to produce electricity for sale. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
65. Compliance with permit conditions in the Title V permit shall be deemed compliance with the following requirements: SJVUAPCD Rule 4305, Sec. 4.2, 5.1.1, 5.1.2., 5.4, 6.1.1, 6.2 (excepting 6.2.3), 6.3, 8.1 and Rule 4351 Sec 4.2, 5.2.2.1, 5.2.2.2, 6.1.1, 6.2 (excepting 6.2.3), 8.1. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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# ATTACHMENT E

District Rule 4601 Stringency Analysis

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**Stringency Comparison of District Rule 4601 Non-SIP Version (12/17/09) to Current SIP Version (10/31/01)**

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
2.0 Applicability	This rule is applicable to any person who supplies, sells, offers for sale, applies, or solicits the application of any architectural coating, or who manufactures any architectural coating for use within the District.	This rule is applicable to any person who supplies, sells, offers for sale, applies, or solicits the application of any architectural coating, or who manufactures, blends or repackages any architectural coating for use within the District.	No change in the applicability, therefore, non-SIP version of rule is as stringent as SIP version.
4.0 Exemptions	<p>The provisions of this rule shall not apply to:</p> <p>4.1 Any architectural coating that is sold or manufactured for use outside of the District or for shipment to other manufacturers for reformulation or repackaging.</p> <p>4.2 Any architectural coating that is sold in a containers with a volume of one liter (1.057 quarts) or less.</p> <p>4.3 Any aerosol coating product.</p>	<p>4.1 The provisions of this rule shall not apply to:</p> <p>4.1.1 Any architectural coating that is supplied, sold, offered for sale, or manufactured for use outside of the District or for shipment to other manufacturers for reformulation or repackaging.</p> <p>4.1.2 Any aerosol coating product.</p> <p>4.2 With the exception of Section 6.2, the provisions of this rule shall not apply to any architectural coating that is sold in a container with a volume of one liter (1.057 quarts) or less.</p>	The only change is to require reporting requirements as discussed in Section 6.2 of the non-SIP approved version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.
5.0 Requirements	<b>Note: Section 5.0 requirements refer to Table of Standards, Table of Standards 1, and Table of Standards 2. These tables are included as Attachment X.</b>		
	<p>5.1 VOC Content Limits: Except as provided in Sections 5.2, 5.3, 5.8 and 8.0, no person shall;</p> <p>5.1.1 manufacture, blend, or repackage for sale within the District;</p> <p>5.1.2 supply, sell, or offer for sale within the district;</p> <p>5.1.3 solicit for application or apply within the District any architectural coating with a VOC content in excess of the corresponding limit specified in the Table of Standards, after the specified effective date in the Table of Standards.</p>	<p>5.1 VOC Content Limits: Except as provided in Sections 5.2 and 5.3, no person shall: manufacture, blend, or repackage for use within the District; or supply, sell, or offer for sale within the District; or solicit for application or apply within the District any architectural coating with a VOC content in excess of the corresponding limit specified in the Table of Standards 1 or the Table of Standards 2, after the specified effective date in the Table of Standards 1 or the Table of Standards 2. Limits are expressed as VOC Regulatory, thinned to the manufacturer's maximum thinning recommendation, excluding any colorant added to tint bases.</p>	Sections 5.8 and 8.0 of the SIP version are not included in the non-SIP version. As discussed in corresponding sections the non-SIP version is more stringent. The Table of Standards and Table of Standards 1 have the same VOC limits. Table of Standard 2 is more stringent as discussed below. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.
	<p>5.2 Most Restrictive VOC Limit: If anywhere on the container of any architectural coating, or any label or sticker affixed to the container, or in any sales, advertising, or technical literature supplied by a manufacturer or anyone acting on their behalf, any representation is made that indicates that the coating meets the definition of or is recommended for use for more than one of the coating categories listed in the Table of Standards, then the most restrictive VOC content limit shall apply. This provision does not apply to the following coating categories:</p> <p>5.2.1 Lacquer coatings (including lacquer sanding sealers)</p> <p>5.2.2 Metallic pigmented coatings</p> <p>5.2.3 Shellacs</p> <p>5.2.4 Fire-retardant coatings</p> <p>5.2.5 Pretreatment wash primers</p> <p>5.2.6 Industrial maintenance coatings</p> <p>5.2.7 Low-solids coatings</p>	<p>5.2 Most Restrictive VOC Limit: If a coating meets the definition in Section 3.0 for one or more specialty coating categories listed in the Table of Standards 1 or the Table of Standards 2, then that coating is not required to meet the VOC limits for Flat, Nonflat, or Nonflat – High Gloss coatings, but is required to meet the VOC limit for the applicable specialty coating listed in the Table of Standards 1 or the Table of Standards 2.</p> <p>5.2.1 Effective until December 31, 2010, with the exception of the specialty coating categories specified in Section 5.2.3.1 through 5.2.3.15, if a coating is recommended for use in more than one of the specialty coating categories listed in the Table of Standards 1, the most restrictive (or lowest) VOC content limit shall apply.</p> <p>5.2.2 Effective on and after January 1, 2011, with the exception of the</p>	The VOC limit of the non-SIP version is at least as stringent as the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>5.2.8 Wood preservatives            5.2.9 High temperature coatings            5.2.10 Temperature-indicator safety coatings            5.2.11 Antenna coatings            5.2.12 Antifouling coatings            5.2.13 Flow coatings            5.2.14 Bituminous roof primers            5.2.15 Specialty primers, sealers and undercoaters</p>	<p>specialty coating categories specified in Sections 5.2.3.2, 5.2.3.3, 5.2.3.5 through 5.2.3.9, and 5.2.3.14 through 5.2.3.18, if a coating is recommended for use in more than one of the specialty coating categories listed in the Table of Standards 2, the most restrictive (or lowest) VOC content limit shall apply.</p> <p>5.2.3 This requirement applies to: usage recommendations that appear anywhere on the coating container, anywhere on any label or sticker affixed to the container, or in any sales, advertising, or technical literature supplied by a manufacturer or anyone acting on their behalf.</p> <p>5.2.3.1 Lacquer coatings (including lacquer sanding sealers)            5.2.3.2 Metallic pigmented coatings            5.2.3.3 Shellacs            5.2.3.4 Fire-retardant coatings            5.2.3.5 Pretreatment wash primers            5.2.3.6 Industrial maintenance coatings            5.2.3.7 Low-solids coatings            5.2.3.8 Wood preservatives            5.2.3.9 High temperature coatings            5.2.3.10 Temperature-indicator safety coatings            5.2.3.11 Antenna coatings            5.2.3.12 Antifouling coatings            5.2.3.13 Flow coatings            5.2.3.14 Bituminous roof primers            5.2.3.15 Specialty primers, sealers and undercoaters            5.2.3.16 Aluminum roof coatings            5.2.3.17 Zinc-rich primers            5.2.3.18 Wood Coatings</p>	
	<p>5.3 Sell-Through of Coatings:            5.3.1 A coating manufactured prior to the January 1, 2003 or January 1, 2004 effective date specified for that coating in the Table of Standards may be sold, supplied, or offered for sale for up to three years after the specified effective date. In addition, a coating manufactured before the effective date specified for that coating in the Table of Standards may be applied at any time, both before and after the specified effective date, so long as the coating complied with the standards in effect at the time the coating was manufactured. This Section 5.3 does not apply to any coating that does not display the date or date-code required by Section 6.1.1.            5.3.2 A coating included in an approved Averaging Program that does not comply with the specified limit in the</p>	<p>5.3 Sell-Through of Coatings:            A coating manufactured prior to the effective date specified for that coating in the Table of Standards 1 or the Table of Standards 2, and that complied with the standards in effect at the time the coating was manufactured, may be sold, supplied, or offered for sale for up to three years after the specified effective date. In addition, a coating manufactured before the effective date specified for that coating in the Table of Standards 1 or the Table of Standards 2 may be applied at any time, both before and after the specified effective date, so long as the coating complied with the standards in effect at the time the coating was manufactured. This Section 5.3 does not apply to any coating that does not display the date or date-code required by Section 6.1.1.</p>	<p>The VOC limit of the non-SIP version is at least as stringent as the SIP version. Section 5.3.2 was removed it is no longer applicable in the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</p>

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>Table of Standards may be sold, supplied, or offered for sale for up to three years after the end of the compliance period specified in the approved Averaging Program. In addition, such a coating may be applied at any time, both during and after the compliance period. This Section 5.3.2 does not apply to any coating that does not display on the container either the statement: "This product is subject to architectural coatings averaging provisions in California" or a substitute symbol specified by the Executive Officer of the California Air Resources Board (ARB). This Section 5.3.2 shall remain in effect until January 1, 2008.</p>		
	<p>5.4 Painting Practices: All architectural coating containers used to apply the contents therein to a surface directly from the container by pouring, siphoning, brushing, rolling, padding, ragging or other means, shall be closed when not in use. These architectural coating containers include, but are not limited to, drums, buckets, cans, pails, trays or other application containers. Containers of any VOC containing materials used for thinning and cleanup shall also be closed when not in use.</p>	<p>5.4 Painting Practices: All architectural coating containers used to apply the contents therein to a surface directly from the container by pouring, siphoning, brushing, rolling, padding, ragging or other means, shall be closed when not in use. These architectural coating containers include, but are not limited to, drums, buckets, cans, pails, trays or other application containers. Containers of any VOC-containing materials used for thinning and cleanup shall also be closed when not in use.</p>	<p>No change in the requirements, therefore, non-SIP version of rule is as stringent as SIP version.</p>
	<p>5.5 Thinning: No person who applies or solicits the application of any architectural coating shall apply a coating that is thinned to exceed the applicable VOC limit specified in the Table of Standards.</p>	<p>5.5 Thinning: No person who applies or solicits the application of any architectural coating shall apply a coating that is thinned to exceed the applicable VOC limit specified in the Table of Standards 1 or the Table of Standards 2.</p>	<p>The VOC limit of the non-SIP version is at least as stringent as the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</p>
	<p>5.6 Rust Preventative Coatings: Effective January 1, 2004, no person shall apply or solicit the application of any rust preventative coating for industrial use, unless such a rust preventative coating complies with the industrial maintenance coating VOC limit specified in the Table of Standards.</p>	<p>5.6 Rust Preventative Coatings: Effective through December 31, 2010, no person shall apply or solicit the application of any rust preventative coating for industrial use, unless such a rust preventative coating complies with the industrial maintenance coating VOC limit specified in the Table of Standards 1.</p>	<p>The VOC limit of the non-SIP version is at least as stringent as the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</p>
	<p>5.7 Coatings Not Listed in the Table of Standards: For any coating that does not meet any of the definitions for the specialty coatings categories listed in the Table of Standards, the VOC content limit shall be determined by classifying the coating as a flat coating or a nonflat coating, based on its gloss, as defined in Sections 3.21, 3.36 and 3.37 and the corresponding flat or nonflat VOC limit shall apply.</p>	<p>5.7 Coatings Not Listed in the Table of Standards 1 or the Table of Standards 2: For any coating that does not meet any of the definitions for the specialty coatings categories listed in the Table of Standards 1 or the Table of Standards 2, the VOC content limit shall be determined by classifying the coating as a Flat, Nonflat, or Nonflat – High Gloss coating, based on its gloss, and the corresponding Flat, Nonflat, or Nonflat – High Gloss VOC limit in the Table of Standards 1 or the Table of Standards 2 shall apply.</p>	<p>The VOC limit of the non-SIP version is at least as stringent as the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</p>
	<p>5.8 Lacquers: Notwithstanding the provisions of Section 3.1, a person or facility may add up to 10 percent by volume of VOC to a lacquer to avoid blushing of the finish during days with relative humidity greater</p>	<p>--</p>	<p>This section has been removed. The operation is required to meet the lacquer VOC limit regardless of</p>

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	than 70 percent and temperature below 65°F, at the time of application, provided that the coating contains acetone and no more than 550 grams of VOC per liter of coating, less water and exempt compounds, prior to the addition of VOC.		temperature and humidity. Therefore, non-SIP version of rule is as stringent as SIP version
	5.9 Averaging Compliance Option: On or after January 1, 2003, in lieu of compliance with the specified limits in The Table of Standards for floor coatings; industrial maintenance coatings; primers, sealers, and undercoaters; quick-dry primers, sealers, and undercoaters; quick-dry enamels; roof coatings; bituminous roof coatings; rust preventative coatings; stains; waterproofing sealers, as well as flats and non-flats (excluding recycled coatings), manufacturers may average designated coatings such that their actual cumulative emissions from the averaged coatings are less than or equal to the cumulative emissions that would have been allowed under those limits over a compliance period not to exceed one year. Such manufacturers must also comply with the averaging provisions contained in Section 8.0, as well as maintain and make available for inspection records for at least three years after the end of the compliance period. This Section 5.9 and Section 8.0 shall cease to be effective on January 1, 2005, after which averaging will no longer be allowed.	---	This section is removed from the non-SIP version, it is no longer applicable. Therefore, non-SIP version of rule is as stringent as SIP version.
	---	5.8 Prior to January 1, 2011, any coating that meets a definition in Section 3.0 for a coating category listed in the Table of Standards 2 and complies with the applicable VOC limit in the Table of Standards 2 and with Sections 5.2 and 6.1 (including those provision of Section 6.1 otherwise effective on January 1, 2011) shall be considered in compliance with this rule.	Table of Standards 2 is more stringent than the VOC limits of Table of Standards in the SIP-Approved version. Therefore, non-SIP version of rule is as stringent as SIP version.
	Table of Standards (See Attachment X for Table)	Table of Standards 1 (Effective through 12/31/10) (See Attachment X for Table)	The non-SIP rule requirements are the same as the Table of Standards in the SIP approved rule, except Table of Standards 1 expires at which time Table of Standards 2 is in effect. As discussed below these standards are more stringent. Therefore, non-SIP version of rule is as stringent as SIP version.
		Table of Standards 2 (Effective on and after 1/1/11) (See Attachment X for Table)	The requirements of Table of Standards 2 are more stringent than the Table of Standards in the SIP rule. Therefore, non-SIP version of rule is as stringent as SIP version.
<b>6.0 Administrative Requirements</b>	6.1 Labeling Requirements: Each manufacturer of any architectural coating subject to this rule shall display the information listed in Sections	6.1 Labeling Requirements: Each manufacturer of any architectural coating subject to this rule shall display the	The non-SIP approved rule contain sections listed in the SIP rule plus

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>6.1.1 through 6.1.9 on the coating container (or label) in which the coating is sold or distributed.</p> <p>6.1.1 Date Code: The date the coating was manufactured, or a date code representing the date, shall be indicated on the label, lid or bottom of the container. If the manufacturer uses a date code for any coating, the manufacturer shall file an explanation of each code with the Executive Officer of the ARB.</p> <p>6.1.2 Thinning Recommendations: A statement of the manufacturer's recommendation regarding thinning of the coating shall be indicated on the label or lid of the container. This requirement does not apply to the thinning of architectural coatings with water. If thinning of the coating prior to use is not necessary, the recommendation must specify that the coating is to be applied without thinning.</p> <p>6.1.3 VOC Content: Each container of any coating subject to this rule shall display either the maximum or actual VOC content of the coating, as supplied, including the maximum thinning as recommended by the manufacturer. VOC content shall be displayed in grams of VOC per liter of coating. VOC content displayed shall be calculated using product formulation data, or shall be determined using the test methods in Section</p> <p>6.3.1. The equations in Sections 3.25 or 3.26, as appropriate, shall be used to calculate VOC content.</p> <p>6.1.4 Industrial Maintenance Coatings: In addition to the information specified in Sections 6.1.1, 6.1.2 and 6.1.3, each manufacturer of any industrial maintenance coating subject to this rule shall display on the label or lid of the container in which the coating is sold or distributed one or more of the following descriptions listed in Section 6.1.4.1 through 6.1.4.3.</p> <p>6.1.4.1 "For industrial use only"</p> <p>6.1.4.2 "For professional use only"</p> <p>6.1.4.3 "Not for residential use" or "Not intended for residential use"</p> <p>6.1.5 Clear Brushing Lacquers: Effective January 1, 2003, the labels of all clear brushing lacquers shall prominently display the statements "For brush application only," and "This product must not be thinned or sprayed."</p> <p>6.1.6 Rust Preventative Coatings: Effective January 1, 2003, the labels of all rust preventative coatings shall prominently display the statement "For Metal Substrates Only"</p> <p>6.1.7 Specialty Primers, Sealers and Undercoaters: Effective January 1, 2003, the labels of all specialty primers, sealers and undercoaters shall prominently</p>	<p>information listed in Sections 6.1.1 through 6.1.14 on the coating container (or label) in which the coating is sold or distributed.</p> <p>6.1.1 Date Code: The date the coating was manufactured, or a date code representing the date, shall be indicated on the label, lid or bottom of the container. If the manufacturer uses a date code for any coating, the manufacturer shall file an explanation of each code with the Executive Officer of the ARB.</p> <p>6.1.2 Thinning Recommendations: A statement of the manufacturer's recommendation regarding thinning of the coating shall be indicated on the label or lid of the container. This requirement does not apply to the thinning of architectural coatings with water. If thinning of the coating prior to use is not necessary, the recommendation must specify that the coating is to be applied without thinning.</p> <p>6.1.3 VOC Content: Each container of any coating subject to this rule shall display one of the following values, in grams of VOC per liter of coating:</p> <p>6.1.3.1 Maximum VOC Content, as determined from all potential product formulations; or</p> <p>6.1.3.2 VOC Content, as determined from actual formulation data; or</p> <p>6.1.3.3 VOC Content, as determined using the test methods in Section 6.3.2.</p> <p>If the manufacturer does not recommend thinning, the container must display the VOC Content, as supplied. If the manufacturer recommends thinning, the container must display the VOC Content, including the maximum amount of thinning solvent recommended by the manufacturer. If the coating is a multicomponent product, the container must display the VOC content as mixed or catalyzed. If the coating contains silanes, siloxanes, or other ingredients that generate ethanol or other VOCs during the curing process, the VOC content must include the VOCs emitted during curing.</p> <p>6.1.4 Faux Finishing Coatings: Effective January 1, 2011, the labels of all clear topcoat Faux Finishing coatings shall prominently display the statement "This product can only be sold or used as part of a Faux Finishing coating system".</p> <p>6.1.5 Industrial Maintenance Coatings: Each manufacturer of any industrial maintenance coating subject to this rule shall display on the label or lid of</p>	<p>additional requirements not found in the SIP version. Therefore, non-SIP version of rule is as stringent as SIP version.</p>

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>display one or more of the descriptions listed in Section 6.1.7.1 through 6.1.7.5.</p> <p>6.1.7.1 For blocking stains.</p> <p>6.1.7.2 For fire-damaged substrates.</p> <p>6.1.7.3 For smoke-damaged substrates.</p> <p>6.1.7.4 For water-damaged substrates.</p> <p>6.1.7.5 For excessively chalky substrates.</p> <p>6.1.8 Quick Dry Enamels: Effective January 1, 2003, the labels of all quick dry enamels shall prominently display the words "Quick Dry" and the dry hard time.</p> <p>6.1.9 Non-flat – High Gloss Coatings: Effective January 1, 2003, the labels of all non-flat – high gloss coatings shall prominently display the words "High Gloss".</p>	<p>the container in which the coating is sold or distributed one or more of the following descriptions listed in Section 6.1.5.1 through 6.1.5.3.</p> <p>6.1.5.1 "For industrial use only"</p> <p>6.1.5.2 "For professional use only"</p> <p>6.1.5.3 "Not for residential use" or "Not intended for residential use"</p> <p>6.1.6 Clear Brushing Lacquers: The labels of all clear brushing lacquers shall prominently display the statements "For brush application only," and "This product must not be thinned or sprayed." (Category deleted effective January 1, 2011.)</p> <p>6.1.7 Rust Preventative Coatings: The labels of all rust preventative coatings shall prominently display the statement "For Metal Substrates Only".</p> <p>6.1.8 Specialty Primers, Sealers and Undercoaters: Effective until December 31, 2010, the labels of all specialty primers, sealers and undercoaters shall prominently display one or more of the descriptions listed in Section 6.1.8.1 through 6.1.8.5. Effective on and after January 1, 2011, the labels of all specialty primers, sealers, and undercoaters shall prominently display one or more of the descriptions listed in Sections 6.1.8.1 through 6.1.8.3. On and after January 1, 2011, Sections 6.1.8.4 and 6.1.8.5 will be no longer effective.</p> <p>6.1.8.1 For fire-damaged substrates.</p> <p>6.1.8.2 For smoke-damaged substrates.</p> <p>6.1.8.3 For water-damaged substrates.</p> <p>6.1.8.4 For excessively chalky substrates.</p> <p>6.1.8.5 For blocking stains.</p> <p>6.1.9 Quick Dry Enamels: The labels of all quick dry enamels shall prominently display the words "Quick Dry" and the dry hard time. (Category deleted effective January 1, 2011.)</p> <p>6.1.10 Reactive Penetrating Sealers: Effective January 1, 2011, the labels of all Reactive Penetrating Sealers shall prominently display the statement "Reactive Penetrating Sealer."</p> <p>6.1.11 Stone Consolidants: Effective January 1, 2011, the labels of all Stone Consolidants shall prominently display the statement "Stone Consolidant - For Professional Use Only."</p> <p>6.1.12 Nonflat– High Gloss Coatings: The labels of all Nonflat – high gloss coatings shall prominently display the words "High Gloss."</p>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
		<p>6.1.13 Wood Coatings: Effective January 1, 2011, the labels of all Wood Coatings shall prominently display the statement "For Wood Substrates Only."</p> <p>6.1.14 Zinc Rich Primers: Effective January 1, 2011, the labels of all Zinc Rich Primers shall prominently display one or more of the following descriptions listed in Section 6.1.14.1 through 6.1.14.3.</p> <p>6.1.14.1 "For industrial use only"</p> <p>6.1.14.2 "For professional use only"</p> <p>6.1.14.3 "Not for residential use" or "Not intended for residential use"</p>	
	<p>6.2 Reporting Requirements</p> <p>6.2.1 Clear Brushing Lacquers: Each manufacturer of clear brushing lacquers shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of clear brushing lacquers sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.2 Rust Preventative Coatings: Each manufacturer of rust preventative coatings shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of rust preventative coatings sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.3 Specialty Primers, Sealers and Undercoaters: Each manufacturer of specialty primers, sealers and undercoaters shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of specialty primers, sealers and undercoaters sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.4 Toxic-Exempt Compounds: For each architectural coating that contains perchloroethylene or methylene chloride, the manufacturer shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB the following information for products sold in the State during the preceding year:</p> <p>6.2.4.1 the product brand name and a copy of the product label with legible usage instructions;</p>	<p>6.2 Reporting Requirements</p> <p>The reporting requirements specified in Sections 6.2.1 through 6.2.6 shall apply until December 31, 2010.</p> <p>6.2.1 Clear Brushing Lacquers: Each manufacturer of clear brushing lacquers shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of clear brushing lacquers sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.2 Rust Preventative Coatings: Each manufacturer of rust preventative coatings shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of rust preventative coatings sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.3 Specialty Primers, Sealers and Undercoaters: Each manufacturer of specialty primers, sealers and undercoaters shall, on or before April 1 of each calendar year beginning in the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall specify the number of gallons of specialty primers, sealers and undercoaters sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p> <p>6.2.4 Toxic Exempt Compounds: For each architectural coating that contains perchloroethylene or methylene chloride, the manufacturer shall, on or before April 1 of each calendar year beginning in the year 2004, submit an</p>	<p><b>Until December 31, 2010 both versions of the rule have the same reporting requirements. After that date the non-SIP approved rule includes very specific information to be kept and is required for all architectural coatings. Therefore, non-SIP version of rule is as stringent as SIP version.</b></p>

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>6.2.4.2 the product category listed in the Table of Standards to which the coating belongs;</p> <p>6.2.4.3 the total sales in California during the calendar year to the nearest gallon;</p> <p>6.2.4.4 the volume percent, to the nearest 0.10 percent, of perchloroethylene and methylene chloride in the coating.</p> <p>6.2.5 Recycled Coatings: Manufacturers of recycled coatings must submit a letter to the Executive Officer of the ARB certifying their status as a Recycled Paint Manufacturer. The manufacturer shall, on or before April 1 of each calendar year beginning with the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall include, for all recycled coatings, the total number of gallons distributed in the State during the preceding year, and shall describe the method used by the manufacturer to calculate State distribution.</p> <p>6.2.6 Bituminous Coatings: Each manufacturer of bituminous roof coatings or bituminous roof primers shall, on or before April 1 of each calendar year beginning with the year 2004, submit an annual report to the Executive Officer of ARB. The report shall specify the number of gallons of bituminous roof coatings or bituminous roof primers sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate State sales.</p>	<p>annual report to the Executive Officer of the ARB the following information for products sold in the State during the preceding year:</p> <p>6.2.4.1 the product brand name and a copy of the product label with legible usage instructions;</p> <p>6.2.4.2 the product category listed in the Table of Standards 1 or the Table of Standards 2 to which the coating belongs;</p> <p>6.2.4.3 the total sales in California during the calendar year to the nearest gallon;</p> <p>6.2.4.4 the volume percent, to the nearest 0.10 percent, of perchloroethylene and methylene chloride in the coating.</p> <p>6.2.5 Recycled Coatings: Manufacturers of recycled coatings must submit a letter to the Executive Officer of the ARB certifying their status as a Recycled Paint Manufacturer. The manufacturer shall, on or before April 1 of each calendar year beginning with the year 2004, submit an annual report to the Executive Officer of the ARB. The report shall include, for all recycled coatings, the total number of gallons distributed in the State during the preceding year, and shall describe the method used by the manufacturer to calculate State distribution.</p> <p>6.2.6 Bituminous Coatings: Each manufacturer of bituminous roof coatings or bituminous roof primers shall, on or before April 1 of each calendar year beginning with the year 2004, submit an annual report to the Executive Officer of ARB. The report shall specify the number of gallons of bituminous roof coatings or bituminous roof primers sold in the State during the preceding calendar year, and shall describe the method used by the manufacturer to calculate state sales.</p> <p>6.2.7 Effective on and after January 1, 2011, Sales Data: All sales data listed in Sections 6.2.7.1 to 6.2.7.14 shall be maintained on-site by the responsible official for a minimum of three years. A responsible official from each manufacturer shall upon request of the Executive Officer of the ARB, or his or her delegate, provide data concerning the distribution and sales of architectural coatings. Sales data submitted by the responsible official to the Executive Officer of the ARB may be claimed as confidential, and such information shall be handled in accordance with the procedures specified in Title 17,</p>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
		<p>California Code of Regulations Sections 91000-91022. The responsible official shall within 180 days provide information, including, but not limited to the data listed in Sections 6.2.7.1 through 6.2.7.14:</p> <p>6.2.7.1 the name and mailing address of the manufacturer;</p> <p>6.2.7.2 the name, address and telephone number of a contact person;</p> <p>6.2.7.3 the name of the coating product as it appears on the label and the applicable coating category;</p> <p>6.2.7.4 whether the product is marketed for interior or exterior use or both;</p> <p>6.2.7.5 the number of gallons sold in California in containers greater than one liter (1.057 quart) and equal to or less than one liter (1.057 quart);</p> <p>6.2.7.6 the VOC Actual content and VOC Regulatory content in grams per liter. If thinning is recommended, list the VOC Actual content and VOC Regulatory content after maximum recommended thinning. If containers less than one liter have a different VOC content than containers greater than one liter, list separately. If the coating is a multi-component product, provide the VOC content as mixed or catalyzed;</p> <p>6.2.7.7 the names and CAS numbers of the VOC constituents in the product;</p> <p>6.2.7.8 the names and CAS numbers of any compounds in the product specifically exempted from the VOC definition;</p> <p>6.2.7.9 whether the product is marketed as solvent-borne, waterborne, or 100% solids;</p> <p>6.2.7.10 description of resin or binder in the product;</p> <p>6.2.7.11 whether the coating is a single-component or multi-component product;</p> <p>6.2.7.12 the density of the product in pounds per gallon;</p> <p>6.2.7.13 the percent by weight of: solids, all volatile materials, water, and any compounds in the product specifically exempted from the VOC definition; and</p> <p>6.2.7.14 the percent by volume of: solids, water, and any compounds in the product specifically exempted from the VOC definition.</p>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>6.3 Test Methods</p> <p>6.3.1 VOC Content of Coatings: To determine the physical properties of a coating in order to perform the calculations in Section 3.26 and 3.27, the reference method for VOC content is U.S. EPA Method 24, except as provided in Sections 6.3.2 and 6.3.15. An alternative method to determine the VOC content of coatings is SCAQMD Method 304-91 (Revised February 1996), incorporated by reference in Section 6.3.14. The exempt compounds content shall be determined by SCAQMD Method 303-91 (Revised August 1996), incorporated by reference in Section 6.3.12. To determine the VOC content of a coating, the manufacturer may use U.S. EPA Method 24, or an alternative method as provided in Section 6.3.2, formulation data, or any other reasonable means for predicting that the coating has been formulated as intended (e.g., quality assurance checks, recordkeeping). However, if there are any inconsistencies between the results of a Method 24 test and any other means for determining VOC content, the Method 24 test results will govern, except when an alternative method is approved as specified in Section 6.3.2. The District Air Pollution Control Officer (APCO) may require the manufacturer to conduct a Method 24 analysis.</p> <p>6.3.2 Alternative Test Methods: Other test methods demonstrated to provide results that are acceptable for purposes of determining compliance with Section 6.3.1, after review and approved in writing by the staffs of the District, the ARB and the U.S. EPA, may also be used.</p> <p>6.3.3 Methacrylate Traffic Marking Coatings: Analysis of methacrylate multicomponent coatings used as traffic marking coatings shall be conducted according to a modification of U.S. EPA Method 24 (40 CFR 59, subpart D, Appendix A), incorporated by reference in Section 6.3.15. This method has not been approved for methacrylate multicomponent coatings used for other purposes than as traffic marking coatings or for other classes of multicomponent coatings.</p> <p>6.3.4 Flame Spread Index: The flame spread index of a fire-retardant coating shall be determined by ASTM Designation E 84-99, "Standard Test Method for Surface Burning Characteristics of Building Materials"(see Section 3, Fire-Retardant Coating).</p> <p>6.3.5 Fire Resistance Rating: The fire</p>	<p>6.3 Test Methods</p> <p>The test methods listed below shall be used to demonstrate compliance with this rule. Alternate equivalent test methods may be used provided the test methods have been approved by the APCO and EPA.</p> <p>6.3.1 Calculation of VOC Content: For the purpose of determining compliance with the VOC content limits in the Table of Standards 1 or the Table of Standards 2, the VOC content of a coating shall be determined as defined in Section 3.77, 3.78, or 3.79 as appropriate. The VOC content of a tint base shall be determined without colorant that is added after the tint base is manufactured. If the manufacturer does not recommend thinning, the VOC Content must be calculated for the product as supplied. If the manufacturer recommends thinning, the VOC Content must be calculated including the maximum amount of thinning solvent recommended by the manufacturer. If the coating is a multi-component product, the VOC content must be calculated as mixed or catalyzed. If the coating contains silanes, siloxanes, or other ingredients that generate ethanol or other VOC during the curing process, the VOC content must include the VOCs emitted during curing.</p> <p>6.3.2 VOC Content of Coatings: To determine the physical properties of a coating in order to perform the calculations in Section 3.77 and 3.79, the reference method for VOC content is EPA Method 24, except as provided in Sections 6.3.3 and 6.3.16. An alternative method to determine the VOC content of coatings is SCAQMD Method 304-91 (Revised February 1996). The exempt compounds content shall be determined by SCAQMD Method 303-91 (Revised 1993), BAAQMD Method 43 (Revised 1996), or BAAQMD Method 41 (Revised 1995), as applicable. To determine the VOC content of a coating, the manufacturer may use EPA Method 24, or an alternative method as provided in Section 6.3.3, formulation data, or any other reasonable means for predicting that the coating has been formulated as intended (e.g., quality assurance checks, recordkeeping). However, if there are any inconsistencies between the results of EPA Method 24 test and any other means for determining VOC content, the EPA Method 24</p>	<p>The non-SIP version includes all the requirements of the SIP version. Therefore, the non-SIP version of the rule is more stringent than the SIP version of the rule.</p>

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>resistance rating of a fire-resistive coating shall be determined by ASTM Designation E 119-98, "Standard Test Methods for Fire Tests of Building Construction Materials"(see Section 3, Fire-Resistive Coating).</p> <p>6.3.6 Gloss Determination: The gloss of a coating shall be determined by ASTM Designation D 523-89 (1999), "Standard Test Method for Specular Gloss"(see Section 3, Flat Coating, Nonflat Coating, Nonflat-High Gloss Coating and Quick-Dry Enamel).</p> <p>6.3.7 Metal Content of Coatings: The metallic content of a coating shall be determined by SCAQMD Method 318-95, Determination of Weight Percent Elemental Metal in Coatings by X-Ray Diffraction, <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i> (see Section 3, Metallic Pigmented Coating).</p> <p>6.3.8 Acid Content of Coatings: The acid content of a coating shall be determined by ASTM Designation D 1613-96, "Standard Test Method for Acidity in Volatile Solvents and Chemical Intermediates Used in Paint, Varnish, Lacquer and related products"(see Section 3, Pre-Treatment Wash Primer).</p> <p>6.3.9 Drying Times: The set-to-touch, dry-hard, dry-to-touch and dry-to-recoat times of a coating shall be determined by ASTM Designation D 1640-95, "Standard Test Methods for Drying, Curing, or Film Formation of Organic Coatings at Room Temperature" (see Section 3, Quick-Dry Enamel and Quick-Dry Primer, Sealer and Undercoater) The tack-free time of a quickdry enamel coating shall be determined by the Mechanical Test Method of ASTM Designation D 1640-95.</p> <p>6.3.10 Surface Chalkiness: The chalkiness of a surface shall be determined using ASTM Designation D4214-98, "Standard Test Methods for Evaluating the Degree of Chalking of Exterior Paint Films"(see Section 3, Specialty Primer, Sealer and Undercoater).</p> <p>6.3.11 Exempt Compounds—Siloxanes: Exempt compounds that are cyclic, branched, or linear completely methylated siloxanes, shall be analyzed as exempt compounds for compliance with Section 6 by BAAQMD Method 43, "Determination of Volatile Methylsiloxanes in Solvent-Based Coatings, Inks, and Related Materials," <i>BAAQMD Manual of Procedures</i>, Volume III, adopted 11/6/96 (see Section 3, Volatile Organic Compound, and Section 6.3.1).</p> <p>6.3.12 Exempt Compounds—</p>	<p>test results will govern, except when an alternative method is approved as specified in Section 6.3.3. The District Air Pollution Control Officer (APCO) may require the manufacturer to conduct an EPA Method 24 analysis.</p> <p>6.3.3 Alternative Test Methods: Other test methods demonstrated to provide results that are acceptable for purposes of determining compliance with Section 6.3.2 4, after review and approved in writing by the staffs of the District, ARB and EPA, may also be used.</p> <p>6.3.4 Methacrylate Traffic Marking Coatings: Analysis of methacrylate multicomponent coatings used as traffic marking coatings shall be conducted according to a modification of EPA Method 24 (40 CFR 59, subpart D, Appendix A). This method has not been approved for methacrylate multicomponent coatings used for other purposes than as traffic marking coatings or for other classes of multicomponent coatings.</p> <p>6.3.5 Flame Spread Index: The flame spread index of a fire-retardant coating shall be determined by ASTM E84-07, "Standard Test Method for Surface Burning Characteristics of Building Materials" (see Section 3.0, Fire-Retardant Coating).</p> <p>6.3.6 Fire Resistance Rating: The fire resistance rating of a fire-resistive coating shall be determined by ASTM E119-07, "Standard Test Methods for Fire Tests of Building Construction Materials" (see Section 3.0, Fire-Resistive Coating).</p> <p>6.3.7 Gloss Determination: The gloss of a coating shall be determined by ASTM D523-89 (1999), "Standard Test Method for Specular Gloss" (see Section 3.0, Flat Coating, Nonflat Coating, Nonflat-High Gloss Coating and Quick-Dry Enamel).</p> <p>6.3.8 Metal Content of Coatings: The metallic content of a coating shall be determined by SCAQMD Method 318-95, Determination of Weight Percent Elemental Metal in Coatings by X-Ray Diffraction, <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i> (see Section 3.0, Metallic Pigmented Coating, Aluminum Roof Coating and Faux Finish).</p> <p>6.3.9 Acid Content of Coatings: The acid content of a coating shall be determined by ASTM D1613-06, "Standard Test Method for Acidity in Volatile Solvents and Chemical Intermediates Used in Paint, Varnish, Lacquer and related products" (see Section 3.0, Pre-Treatment Wash Primer).</p>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>Parachlorobenzotrifluoride (PCBTF): The exempt compound parachlorobenzotrifluoride, shall be analyzed as an exempt compound for compliance with Section 6 by BAAQMD Method 41, "Determination of Volatile Organic Compounds in Solvent Based Coatings and Related Materials Containing Parachlorobenzotrifluoride," <i>BAAQMD Manual of Procedures</i>, Volume III, adopted 12/20/95 (see Section 3, Volatile Organic Compound, and Section 6.3.1).</p> <p>6.3.13 Exempt Compounds: The content of compounds under U.S. EPA Method 24 shall be analyzed by SCAQMD Method 303-91 (Revised 1996), "Determination of Exempt Compounds," <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i> (see Section 3, Volatile Organic Compound, and Section 6.3.1).</p> <p>6.3.14 VOC Content of Coatings: The VOC content of a coating shall be determined by U.S. EPA Method 24 as it exists in appendix A of 40 <i>Code of Federal Regulations</i> (CFR) part 60, "Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings" (see Section 6.3.1).</p> <p>6.3.15 Alternative VOC Content of Coatings: The VOC content of coatings may be analyzed either by U.S. EPA Method 24 or SCAQMD Method 304-91 (Revised 1996), "Determination of Volatile Organic Compounds (VOC) in Various Materials," <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i> (see Section 6.3.1).</p> <p>6.3.16 Methacrylate Traffic Marking Coatings: The VOC content of methacrylate multicomponent coatings used as traffic marking coatings shall be analyzed by the procedures in 40 CFR part 59, subpart D, appendix A, "Determination of Volatile Matter Content of Methacrylate Multicomponent Coatings Used as Traffic Marking Coatings" (September 11, 1998) (see Section 6.3.3).</p>	<p>6.3.10 Drying Times: The set-to-touch, dry-hard, dry-to-touch and dry-to-recoat times of a coating shall be determined by ASTM D1640-95, "Standard Test Methods for Drying, Curing, or Film Formation of Organic Coatings at Room Temperature" (see Section 3.0, Quick-Dry Enamel and Quick-Dry Primer, Sealer and Undercoater) The tack-free time of a quick-dry enamel coating shall be determined by the Mechanical Test Method of ASTM D1640-95. (Category deleted effective January 1, 2011.)</p> <p>6.3.11 Surface Chalkiness: The chalkiness of a surface shall be determined using ASTM D4214-98, "Standard Test Methods for Evaluating the Degree of Chalking of Exterior Paint Films" (see Section 3, Specialty Primer, Sealer and Undercoater). (Category deleted effective January 1, 2011.)</p> <p>6.3.12 Exempt Compounds—Siloxanes: Exempt compounds that are cyclic, branched, or linear completely methylated siloxanes, shall be analyzed as exempt compounds for compliance with Section 6 by BAAQMD Method 43, "Determination of Volatile Methylsiloxanes in Solvent-Based Coatings, Inks, and Related Materials," <i>BAAQMD Manual of Procedures</i>, Volume III, adopted 11/6/96 (see Section 3.0, Volatile Organic Compound, and Section 6.3.2).</p> <p>6.3.13 Exempt Compounds—Parachlorobenzotrifluoride (PCBTF): The exempt compound parachlorobenzotrifluoride, shall be analyzed as an exempt compound for compliance with Section 6 by BAAQMD Method 41, "Determination of Volatile Organic Compounds in Solvent Based Coatings and Related Materials Containing Parachlorobenzotrifluoride," <i>BAAQMD Manual of Procedures</i>, Volume III, adopted 12/20/95 (see Section 3.0, Volatile Organic Compound, and Section 6.3.2).</p> <p>6.3.14 Exempt Compounds: The content of compounds under U.S. EPA Method 24 shall be analyzed by SCAQMD Method 303-91 (Revised 1993), "Determination of Exempt Compounds," <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i> (see Section 3.0, Volatile Organic Compound, and Section 6.3.2).</p> <p>6.3.15 VOC Content of Coatings: The VOC content of a coating shall be determined by EPA Method 24 as it exists in appendix A of 40 <i>Code of</i></p>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
		<p><i>Federal Regulations</i> (CFR) part 60, "Determination of Volatile Matter Content, Water Content, Density, Volume Solids and Weight Solids of Surface Coatings" (see Section 6.3.2).</p> <p>6.3.16 Alternative VOC Content of Coatings: The VOC content of coatings may be analyzed either by U.S. EPA Method 24 or SCAQMD Method 304-91 (Revised 1996), "Determination of Volatile Organic Compounds (VOC) in Various Materials," <i>SCAQMD Laboratory Methods of Analysis for Enforcement Samples</i>.</p> <p>6.3.17 Methacrylate Traffic Marking Coatings: The VOC content of methacrylate multicomponent coatings used as traffic marking coatings shall be analyzed by the procedures in 40 CFR part 59, subpart D, appendix A, "Determination of Volatile Matter Content of Methacrylate Multicomponent Coatings Used as Traffic Marking Coatings" (September 11, 1998).</p> <p>6.3.18 Hydrostatic Pressure for Basement Specialty Coatings: The hydrostatic pressure resistance for basement specialty coatings shall be analyzed using ASTM D7088-04, "Standard Practice for Resistance to Hydrostatic Pressure for Coatings Used in Below Grade Applications Applied to Masonry".</p> <p>6.3.19 Tub and Tile Refinish Coating Adhesion: The adhesion of tub and tile coating shall be determined by ASTM D4585-99, "Standard Practice for Testing Water Resistance of Coatings Using Controlled Condensation" and ASTM D3359-02, "Standard Test Methods for Measuring Adhesion by Tape Test".</p> <p>6.3.20 Tub and Tile Refinish Coating Hardness: The hardness of tub and tile refinish coating shall be determined by ASTM D3363-05, "Standard Test Method for Film Hardness by Pencil Test".</p> <p>6.3.21 Tub and Tile Refinish Coating Abrasion Resistance: Abrasion resistance of tub and tile refinish coating shall be analyzed by ASTM D4060-07, "Standard Test Methods for Abrasion Resistance of Organic Coatings by the Taber Abraser".</p> <p>6.3.22 Tub and Tile Refinish Coating Water Resistance: Water resistance of tub and tile refinish coatings shall be determined by ASTM D4585-99, "Standard Practice for Testing Water Resistance of Coatings Using Controlled Condensation" and ASTM D714-02e1, "Standard Test Method</p>	

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
		<p>for Evaluating Degree of Blistering of Paints".</p> <p>6.3.23 Waterproofing Membrane: Waterproofing membrane shall be tested by ASTM C836-06, "Standard Specification for High Solids Content, Cold Liquid-Applied Elastomeric Waterproofing Membrane for Use with Separate Wearing Course".</p> <p>6.3.24 Mold and Mildew Growth for Basement Specialty Coatings: Mold and mildew growth resistance for basement specialty coatings shall be determined by ASTM D3273-00, "Standard Test Method for Resistance to Growth of Mold on the Surface of Interior Coatings in an Environmental Chamber" and ASTM D3274-95, "Standard Test Method for Evaluating Degree of Surface Disfigurement of Paint Films by Microbial (Fungal or Algal) Growth or Soil and Dirt Accumulation".</p> <p>6.3.25 Reactive Penetrating Sealer Water Repellency: Reactive penetrating sealer water repellency shall be analyzed by ASTM C67-07, "Standard Test Methods for Sampling and Testing Brick and Structural Clay Tile"; or ASTM C97-02, "Standard Test Methods for Absorption and Bulk Specific Gravity of Dimension Stone"; or ASTM C140-06, "Standard Test Methods for Sampling and Testing Concrete Masonry Units and Related Units".</p> <p>6.3.26 Reactive Penetrating Sealer Water Vapor Transmission: Reactive penetrating sealer water vapor transmission shall be analyzed ASTM E96/E96M-05, "Standard Test Method for Water Vapor Transmission of Materials".</p> <p>6.3.27 Reactive Penetrating Sealer - Chloride Screening Applications: Reactive penetrating sealers shall be analyzed by National Cooperative Highway Research Report 244 (1981), "Concrete Sealers for the Protection of Bridge Structures".</p> <p>6.3.28 Stone Consolidants: Stone consolidants shall be tested using ASTM E2167-01, "Standard Guide for Selection and Use of Stone Consolidants".</p>	
<b>7.0 Compliance Schedule</b>	Persons subject to this rule shall be in compliance with this rule by October 31, 2001.	Persons subject to this rule shall be in compliance with this rule by the dates specified within the rule.	<b>No change in the requirements, therefore, non-SIP version of rule is as stringent as SIP version.</b>
<b>8.0 Averaging Compliance Option</b>	8.1 On or after January 1, 2003, in lieu of compliance with the specified limits in the Table of Standards for floor coatings; industrial maintenance coatings; primers, sealers, and undercoaters; quick-dry primers, sealers, and undercoaters; quick-dry enamels; roof coatings; rust		<b>No change in the requirements, therefore, non-SIP version of rule is as stringent as SIP version.</b>

Requirement Category	SIP Version of Rule 4601 (10/31/01)	Non-SIP Version of Rule 4601 (12/17/09)	Conclusion
	<p>preventative coatings; stains; waterproofing sealers, as well as flats and non-flats (excluding recycled coatings), manufacturers may average designated coatings such that their actual cumulative emissions from the averaged coatings are less than or equal to the cumulative emissions that would have been allowed under those limits over a compliance period not to exceed one year. Such manufacturers must also comply with the averaging provisions contained in this Section, as well as maintain and make available for inspection records for at least three years after the end of the compliance period. This Section shall cease to be effective on January 1, 2005, after which averaging will no longer be allowed.</p> <p>Per Section 8.1, averaging is no longer applicable. Therefore, Section 8.2 through 8.14 are not listed.</p>		

District Rule 4601 was amended (12/17/2009). As analyzed, each amended section of the non-SIP version of the rule is at least as stringent as, or more stringent than the corresponding section of the SIP version of the rule. Therefore, it is concluded that overall the non-SIP version of the rule is more stringent than the SIP version of the rule.

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# ATTACHMENT F

SO<sub>2</sub> Testing Requirements from SJVUAPCD  
Title V Boiler Template SJV-BSG-7-0

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# Template SJV-BSG-7-0

## Step 1. Side-by-side Comparison of emission limits

<b>SO<sub>x</sub> (diesel fuel firing)</b>				
<b>CITATION:</b>	<b>District Rule 4301</b>	<b>County Rules 404, 406, and 407</b>	<b>40 CFR § 60.42c(d)</b>	<b>Proposed Requirements</b>
<b>WORK PRACTICE STANDARDS:</b>	none	none		0.5% by weight fuel oil sulfur content
<b>EMISSION LIMIT:</b>	200 lb sulfur compounds/hr, calculated as SO <sub>2</sub> (5.2.1)	Two-tenths (0.2) percent by volume calculated as sulfur dioxide (SO <sub>2</sub> ), on a dry basis averaged over 15 consecutive minutes	0.5 lb SO <sub>x</sub> /MMBtu of heat input when fired on fuel oil <u>OR</u> 0.5% by weight maximum fuel oil sulfur content	none
<b>MONITORING:</b>	none	none	As required by 40 CFR § 60.48c (d) through (f)	If the unit is not fired on diesel fuel with supplier-certified 0.05% sulfur content or less, by weight, the sulfur content of each fuel source shall be tested weekly except that if compliance with the fuel sulfur content limit has been demonstrated for 8 consecutive weeks for a fuel source, then the testing frequency shall be annually. [District Rule 2520, 9.4.2]
<b>RECORDKEEPING:</b>	none	none	As required by 40 CFR § 60.48c (d) through (f)	Record sulfur content for each fuel delivery [District Rule 2520, 9.4.2]
<b>REPORTING:</b>	none	none	As required by 40 CFR § 60.48c (d) through (f)	none
<b>TEST METHODS:</b>	ARB Method 100 [6.2] EPA Method 8 or ARB Method 8 [6.4] EPA Method 2 [6.5] EPA Method 4 [6.6]	EPA Method 8 and ARB Method 1-100 (Continuous Stack Sampling)	Fuel supplier certification	Fuel supplier certification or ASTM Method D 1072-80, D 3031-81, D 4084-82 or D 3246-81 [District Rule 2520, 9.4.2]

## Step 2. Select most stringent emission limit or performance standard

District Rule 4301 limits the emission of sulfur compounds to 200 lb/hr calculated as SO<sub>2</sub>. Oil-firing units qualifying to use this template are limited to the combustion of distillate fuel with a sulfur content less than 0.5%. The following demonstration illustrates, by solving for fuel sulfur content at the Rule 4301 emission limit, that the proposed limitation is more stringent than District Rule 4301, 5.2.1.