

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

ENGINEERING AND COMPLIANCE

APPLICATION PROCESSING AND CALCULATION

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Date: 10/18/12

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PROCESSED BY: MS

CHECKED BY: DR

PERMIT TO OPERATE EVALUATION

Applicant name: Fontana Paper Mills, Inc. (FACILITY ID# 11716)

Mailing address: 13733 Valley Blvd.
Fontana, CA 92335

Equipment Location: 13733 Valley Blvd.
Fontana, CA 92335

EQUIPMENT DESCRIPTIONS:

APPLICATION NO. 449480

MODIFICATION TO ROLL COATER (D48) BY REMOVAL OF CONDITION E80.1:

THE OPERATOR SHALL NOT USE THIS EQUIPMENT WHEN ANY OF THE FOLLOWING EQUIPMENT ARE OPERATING:

DEVICE ID: D11 [ASPHALT SATURATOR]

APPLICATION NO. 449479

RECLAIM/TITLE V REVISION APPLICATION

PERMIT CONDITIONS: (SEE RECLAIM PERMIT)

BACKGROUND:

Fontana Paper Mills is a Title V/Reclaim facility. On 10/07/05, the facility filed A/N 449480 for modification of the asphalt saturator/roll coater (A/N 343772, P/N D47421) by removing condition E80.1 which states equipment shall not operate simultaneously with asphalt saturator (D11).

On 10/07/05, facility filed A/N 449479 for De Minimis Significant RECLAIM/Title V Revision.

The following compliance activity was found in District records of the past 5 years:

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Complaints:

- No complaints found in District Records.

Notices to Comply:

- D10036, 8/10/07, for Recordkeeping, Permit conditions, Gas Co. billing. No rule violation was recorded by the inspector.
- C87104, 9/01/09, to adjust natural gas usage correction factor to included pressure and temperature on all in-house uncorrected meters. No rule violation was recorded by the inspector.
- C87106, 3/17/10, to conduct proper missing data procedures for the Emergency ICE D59. No rule violation was observed by inspector.

Notices of Violation:

- P52268, 7/07/09 issue date, 1/1/08 violation date, late 2nd qtr QCER. Facility is now in compliance.

PROCESS DESCRIPTION:

The asphalt coating line (Application No. 343772) consists of the asphalt filler mixer, surge tanks and coater. Potential ROG and H2S emissions are controlled by venting the equipment to a regenerative thermal oxidizer (See application 343771) with a designed combustion bed temperature range of 1600 to 1800 degrees Fahrenheit and a 0.75 second retention time. The maximum production rate is 20 tons/hour. A process flow diagram is contained in the application folder. (See Figure 1).

EMISSIONS:

APPLICATION NO. 449480 – Allow D11 and D48 to operate simultaneously

Operating Schedule: 24 hours/day, 7 days/week, 52 weeks/yr
Max Process: 20 tons/hr based on facility data (See File)
Average Rate: 17.2 tons/hr based on facility data (See File)

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Source Test Results (02/20/2009)

Hourly Emissions

VOC: .089 lb/hr

PM10: .012 lb/hr

Daily Emissions

VOC

.089 lbs/hr x (20/17.2) x 24 hrs/day = **2.48 lbs/day**

PM10

.012 lbs/hr x (20/17.2) x 24 hrs/day = **0.33 lbs/day**

Annual Emissions

VOC

2.48 lbs/day (30 days) (12 months) = 892.8 lbs/yr

PM10

0.33 lbs/day (30 days) (12 months) = 118.8 lbs/yr

RULES EVALUATION:

RULE 212 - Standard for Approving Permits

Paragraph 212(c)(1) Requires a public notice for all new or modified permit units that may emit air contaminants located within 1,000 feet from the outer boundary of a school. According to the website yahoo.com the nearest school, Henry J. Kaiser High School, is at least 5,000 feet from Fontana Paper Mills property line. A 30-Day Public Notice is not required under this paragraph.

Paragraph 212(c)(2) The equipment will not result in on-site emission increase exceeding the daily maximum emissions as specified in the table in Rule 212(g). Therefore, a 30-day public notice period will not be required under this paragraph.

Paragraph 212(c)(3) The equipment will not result in on-site toxic emission increase exceeding cancer risk levels specified under this paragraph. Therefore, Public notice will not be required.

RULE 401 - Visible Emission: No visible emission is expected if the equipment is well maintained and properly operated. Therefore, compliance is expected.

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RULE 402 - Public Nuisance: No complaints in the district database. All notices were corrected, therefore is not expected to create any nuisance problems.

RULE 404 - Particulate Matter Concentration:

A/N 449480: Grain loading: = (0.012 lb/hr) (7,000 g/lb)/(1,700 scfm) (60 min/hr) = 0.0008 gr/scf. Compliance is expected.

RULE 405 – Solid Particulate Matter Weight:

A/N 449480: Process weight per hour is 20 tons. PM is under maximum discharge rate of 13.7 lbs/hr. Compliance is expected.

RULE 1303 – BACT:

A/N 449480 – Asphalt Roofing Line

Subcategory/	VOC	NOx	SOx	CO	PM
ALL		Natural Gas (1990)	Natural Gas (1990)		Natural Gas with High Velocity Filter and Mist Eliminator (1990)

Facility is in compliance with BACT requirements.

RULE 1303 –Modeling and Offsets:

A/N 449480 – Modification to Asphalt Saturator (D11)

ROG emissions are 2.48 lbs/day. PM10 emissions expected to be less than 0.5 lbs/day. PM10 modeling analysis not required for asphalt roofing line since emissions do not exceed screening levels.

ROG OFFSETS

$$2.48 \times 1.2 = 2.98 \text{ lbs/day}$$

3 lbs/day of ROG emission offsets are required. Facility will offset 3 lbs/day using ERC credit.

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OFFSETS: FACILITY WIDE TOTALS (LBS/DAY)

	ROG	SOX	NOX	CO	PM10
PREVIOUS TOTAL	103	0	26	84	15
INCREASE	+3	0	0	0	0
NEW TOTAL	106	0	26	84	15

Reg XXX - Title V Permits: Fontana Paper Mills has applied for "De Minimis Permit Revision." Therefore, EPA 45-day review is required.

CONCLUSIONS AND RECOMMENDATIONS:

A/N 449480 - Issue P/O, with change of condition, as indicated in the facility permit, and as described in this report upon certification of proof for Emission Reduction Credits.

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STATIONARY SOURCES DIVISION

APPLICATION PROCESSING AND CALCULATIONS

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PROCESSOR	REVIEWER
KKM	

Figure 1 - Asphalt Roofing Manufacturing
Fontana Paper Mills
March 8, 1999

