PERMIT TO CONSTRUCT/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. 523302

FIRE RETARDANT UNDERLAYMENT SYSTEM CONSISTING OF:

1. BAG FEEDER **(D84)**, NO. 1, SCHENCK ACCURATE, SACMASTER, 2 TON CAPACITY.
2. BAG FEEDER **(D85)**, NO. 2, SCHECK ACCURATE, SACMASTER, 2 TON CAPACITY.
3. WEIGH FEEDER **(D86)**, NO. 1, SCHENCK ACCURATE, MECHATRON CONI-PLEX, 3 HP.
4. WEIGH FEEDER **(D87)**, NO. 2, SCHENCK ACCURATE, MECHATRON CONI-PLEX, 3 HP.
5. TUBULAR DRAG CONVEYOR **(D89)**, 3 HP, WITH A 1/3 HP DISCHARGE VIBRATOR.

APPLICATION NO. 523304

AIR POLLUTION CONTROL SYSTEM CONSISTING OF:

1. BAGHOUSE **(C88)**, CAMFIL FARR, CARTRIDGE TYPE, MODEL GS-MINI, WITH A SINGLE CARTRIDGE, MODEL HEMIPLEAT GOLD CONE, 3'-3" L. X 1'-3" DIA., FILTER AREA 325 SQ. FT.
2. EXHAUST SYSTEM WITH A 2 HP BLOWER VENTING THE FIRE RETARDANT UNDERLAYMENT SYSTEM.

APPLICATION NO. 523306

TITLE V/RECLAIM REVISION

PERMIT CONDITIONS: (SEE SAMPLE PERMIT)

BACKGROUND:

On June 7, 2011, Fontana Paper Mills filed A/N 523302 for permit to construct/operate a fire retardant underlayment system consisting of two bag feeders and two weigh feeders.

A/N 523304 was filed for permit to construct/operate a cartridge type baghouse venting the fire retardant underlayment system.

A/N 52306 was filed for the Title V/Reclaim revision.

Fontana Paper Mills had also proposed to construct a new mixer vented to the existing afterburner. On April 20, 2012, Fontana Paper Mills informed the district that they no longer plan to install the additional mixing tank. Therefore, A/N 525890 will be cancelled.

PROCESS DESCRIPTION:

The fire retardant underlayment system will operate in conjunction with the existing asphalt coating line for the manufacture of fire retardant asphalt coating roof shingles. The Monammonium phosphate (MAP) and colemanite will be delivered from sacks to the proposed bag feeders #1 and #2 and transferred into proposed weigh feeders #1 and #2. The MAP and colemanite will then be conveyed to an existing asphalt mixing tank (D53). MAP and colemanite are additives to reduce flammability in base asphalt. The proposed bag feeders and weigh feeders will be vented by a cartridge type baghouse.

CALCULATIONS:

APPLICATION NO. 523302 – FIRE RETARDANT UNDERLAYMENT SYSTEM

ASSUMPTIONS

Operating Schedule: 24 hr/day, 7 days/wk, 52 wks/yr
Max Rate into Bag Feeders: 144 tons/day, 6 tons/hr
Max Rate into Weigh Feeders: 144 tons/day, 6 tons/hr
Emission factors: .0051 lb PM10/ton AP-42 table 11.12-2 (weigh hopper loading)

Assumptions: 1. 99.99% baghouse efficiency (98% for calculation purposes)

2. Three Transfer Points

Transfer to Bag Feeder (emissions expected) → Bin Feeder → **Transfer to Weigh Feeder (emissions expected)** → Weigh Feeder → **Transfer to Mixing Tank (emissions expected)**

Max hourly Controlled Emissions = 3 (6 tons/hr) (0.0051 lbs/ton)(1-.98) = .0018 lbs/hr

Max daily Controlled Emissions = 3 (144 tons/day(.0051 lbs/ton)(1-.98) = .044 lbs/day

30 day average = .044 lbs/day x 30 / 30 = .044 lbs/day

Average annual emissions = .044 lbs/day x 30 x 12 = 15.86 lbs/year

APPLICATION NO. 523304 - BAGHOUSE

Air Cloth Ratio
Given: Filter Area = 325 Total Sq. Ft.
Blower CFM = 550 cfm
Air Cloth Ratio = 550/325

The Air Cloth Ratio is to 1.7 to 1, which is acceptable.

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.

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 – 0.0018 lb/hr x 7000 gr/hr / (550 cfm x 60) = 0.00038 gr/cu. ft. Limit is 0.196 gr/cu ft. so this complies.

RULE 405 – Rule allows approximately 8.95 lbs/hr, Controlled PM = 0.0018 lbs/hr, therefore complies with this rule.

RULE 1303(a)-BACT: Bulk Solid Material Handling – Other:

	Criteria Pollutants					
Subcategory/Rating/ Size	**VOC**	**NOX**	**NOX + NMHC**	**SOX**	**CO**	**PM10**
Other Dry Materials Handling 2)						Enclosed Conveyors and Baghouse (7-11-97)

The operator has a baghouse installed to vent PM10 emissions from bag feeders and weigh feeders. Facility complies with BACT.

RULE XIII -Modeling: Modeling is not required as the PM10 emissions are .0018 lbs/hr which is less than the .41 lbs/hr specified in Appendix A of Rule 1303. Modeling passes.

RULE XIII -Offsets: Emissions are expected to be less than 0.5 lbs/day. Offsets not required.

RULE 1401- New Source Review of Toxic Air Contaminants: There are no toxic emissions resulting from the operation of the above equipment. Compliance with this rule is expected.

Reg XXX – Title V Permits: Fontana Paper Mills has applied for a "De minimis permit revision." Therefore, EPA 45-day review is required.

CONCLUSIONS AND RECOMMENDATIONS:

Based on the evaluation contained herein, the subject equipment will comply with all of the District's rules and regulations once control is installed; therefore, I recommend a Permit to Construct/Operate be issued to fire retardant system (A/N 523302) and baghouse (A/N 523304).