

**MONTEREY BAY UNIFIED AIR POLLUTION CONTROL DISTRICT
TITLE V OPERATING PERMIT TV69-01**

24580 Silver Cloud Court
Monterey, CA 93940
Telephone: (831) 647-9411

ISSUED TO:

Trical, Inc.
P.O. Box 1327
Hollister, CA 95024-1327

PLANT SITE LOCATION:

8770 Highway 25
Hollister, California

ISSUED BY:

Richard Stedman, Air Pollution Control Officer

September 1, 2012
Proposed Effective Date

Nature of Business: Formulation and Packaging of Soil, Structural and Commodity Fumigants

SIC Code: 2879 - Pesticides and Agricultural Chemicals

RESPONSIBLE OFFICIAL:

Name: Mr. Paul Niday
Title: Vice President - Operations
Phone: (831) 637-0195

ALTERNATIVE RESPONSIBLE OFFICIAL:

Name: Mr. John Ivancovich
Title: Safety Manager
Phone: (831) 637-0195

FACILITY CONTACT PERSON:

Name: Mr. Val dEleon
Title: Filling Plant Manager
Phone: (831) 637-0195

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FACILITY DESCRIPTION

Trical's Bolsa facility is a fumigant formulation and packaging operation. Trical formulates mixtures of methyl bromide, chloropicrin, and telone (1,3-dichloropropene) for use in the agricultural, structural and commodity pest control markets.

The chemicals are received in bulk by rail tanker, tank truck and cylinders. The chemicals are transferred under pressure into bulk storage tanks or into smaller cylinders for resale. In addition to the chemical storage, formulation, and packaging operations, the facility has an enclosed shot blaster for removing paint from the cylinders, a paint spraying operation for coating the cylinders, and laboratory equipment with dedicated ventilation systems.

Trical is considered a federal Major Source and subject to the Title V permitting program due to the potential to emit (PTE) methyl bromide. Methyl bromide is listed as a Hazardous Air Pollutant (HAP) under Title III of the Clean Air Act. The PTE methyl bromide from the facility exceeds the 10 ton per year (TPY) major source threshold for a single HAP. This major source determination was based upon information supplied to the District in the facility's AB 2588 (Air Toxics Hot Spots Information and Assessment Act) submittal which reported 10.5 TPY of methyl bromide emissions from the facility for calendar year 1991.

EQUIPMENT DESCRIPTION

FUMIGANT STORAGE, FORMULATION AND PACKAGING FACILITY CONSISTING OF:

1. Railcar And Stationary Storage Tanks, With Associated Piping Systems, Pumps, Etc. For The Transfer Of Fumigants Between Tanks And The Fumigant Filling Stations.
2. Six Fumigant Filling Stations Located Under Ventilation Hoods, Equipped With Hoses And Attachments For Filling Fumigant Cylinders, With The Ability To Route Displaced Vapors To Carbon Adsorption System.
3. Cylinder Paint Scrubbing Operation, Enclosed Steel Shot Blaster Venting To A Baghouse.
4. Paint Spray Booth, Industrial Type Paint Spray Booth With Exhaust Filters.
5. Laboratory Fume Hoods.

FEDERALLY ENFORCEABLE EMISSION LIMITS AND STANDARDS

1. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three (3) minutes in any one (1) hour which is as dark or darker than Ringelmann 1 or equivalent 20% opacity. [District Rule 400]
2. Particulate matter shall not exceed 0.15 grains per standard dry cubic foot in any exhaust stream. [District Rule 403]

- 3. No more than 40 pounds per day of volatile organic compounds shall be discharged from the Paint Spray Facility. [District Rule 416]
- 4. Trical shall limit emissions of volatile organic compounds by the use of architectural coatings which comply with the requirements of District Rule 426. [District Rule 426]
- 5. Trical shall limit emissions of volatile organic compounds during solvent cleaning and degreasing operations pursuant to the requirements of District Rule 433. [District Rule 433]
- 6. If total combined usage of coatings applied to metal parts and products, as defined by District Rule 434, equals or exceeds 55 gallons per year, each coating used for metal parts and products must not exceed the following volatile organic compound (VOC) content limits [District Rule 434]:

<u>Coating Category</u>	<u>VOC Content</u>	
	<u>Limit, As Applied</u>	
	<u>grams/liter</u>	<u>lb/gal</u>
Pretreatment Wash Primer	780	6.5
All Other Coatings	420	3.5

- 7. Trical shall comply with the requirements of Sections 61.145 through 61.147 of the National Emission Standard for Asbestos for all demolition and renovation projects. [40 CFR Part 61, Subpart M]
- 8. Trical shall comply with the requirements of 40 CFR Part 68 - Risk Management Plans. Trical's Risk Management Plan must be revised and updated by October 24, 2016 or earlier as required by 40 CFR §68.190. Trical shall certify compliance with these requirements as part of the annual compliance certification required by 40 CFR Part 70 and this permit. [40 CFR Part 68]
- 9. Trical shall comply with the requirements of 40 CFR Part 82 - Protection of Stratospheric Ozone [40 CFR Part 82]

TESTING REQUIREMENTS AND PROCEDURES

- 10. No testing is specified for the generic (Rule 400) opacity requirement from condition number 1. This equipment is assumed to be in compliance with the opacity requirement based upon the information contained in the engineering evaluation. If testing is conducted for condition number 1, Trical should conduct testing in accordance with the methodology contained in EPA Method 9 and the averaging/aggregating period contained in District Rule 400. [District Rule 218]
- 11. No testing is specified for the generic (Rule 403) particulate matter emission standard from condition number 2. This equipment is assumed to be in compliance with the particulate matter emission standard

based upon the information contained in the engineering evaluation. If testing is conducted for condition number 2, Trical should conduct testing in accordance with the methodology contained in EPA Method 5. [District Rule 218]

MONITORING AND RECORD KEEPING REQUIREMENTS

12. Trical shall maintain a daily log which records the amount and type of solvent containing material consumed in the paint spray booth to verify compliance with condition 3. [District Rule 218]
13. Trical shall maintain a monthly log of the facility-wide total volume of make-up solvent used, and waste solvent disposed of or recycled, for all cleaning devices using volatile organic compounds for solvent cleaning and degreasing. [District Rule 433]

The record keeping provisions of this condition do not apply to remote reservoir cold cleaners which are serviced by an independent contractor. For such remote cold cleaners, evidence of service shall be maintained.
14. Trical shall maintain monthly records sufficient to verify compliance with condition 6. These records shall contain at a minimum: the types of all coatings used; the name of each coating and manufacturer; the VOC content of each coating; the VOC, water and exempt compound content of reducers; and the mix ratio of coatings and reducers. [District Rule 434]
15. As applicable Trical shall maintain the following general records of required monitoring information [District Rule 218]:
 - A) the date and time of sampling or measurements;
 - B) the date(s) analyses were performed;
 - C) the company or entity that performed the analyses;
 - D) the analytical techniques or methods used;
 - E) the results of such analyses;
 - F) the operating conditions existing at the time of sampling or measurement; and
 - G) the records of quality assurance for continuous monitoring systems (including, but not limited to quality control activities, audits, and calibration drift checks) and source testing methods.
16. Trical shall maintain records on the occurrence and duration of any start-up, shutdown, or malfunction in the operation of the equipment under this permit. [District Rule 218]
17. Trical shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring, sample collection, measurement, report, and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. [District Rule 218]

REPORTING REQUIREMENTS

18. Trical shall report all breakdowns which results in the inability to comply with any emission standard or requirement contained on this permit to the Air Pollution Control Officer (APCO) within 1 hour of the occurrence; this one hour period may be extended up to six hours for good cause by the APCO. The APCO may elect to take no enforcement action if Trical demonstrates to the APCO's satisfaction that a breakdown condition exists.

The estimated time for repair of the breakdown shall be supplied to the APCO within 24 hours of the occurrence and a written report shall be supplied to the APCO with 5 days after the occurrence has been corrected. This report shall include at a minimum [District Rule 214]:

- A) a statement that the condition or failure has been corrected and the date of correction; and
 - B) a description of the reasons for the occurrence; and
 - C) a description of the corrective measures undertaken and/or to be undertaken to avoid such an occurrence in the future; and
 - D) an estimate of the emissions caused by the condition or failure.
19. Trical shall submit semiannual monitoring reports to the District, in a District approved format, no later than August 15 for the period of January 1 through June 30 and no later than February 15 for the period of July 1 through December 31. [District Rule 218]
These monitoring reports shall include at a minimum:
- A) the time intervals, date and magnitude of excess emissions, nature and cause of the excess (if known), corrective actions and preventative measures adopted; and
 - B) the averaging period used for data reporting corresponding to the averaging period specified in the emission test period used to determine compliance with an emission standard for the pollutant in question; and
 - C) all information pertaining to any monitoring as required by the permit; and
 - D) a negative declaration specifying when no excess emissions occurred.
20. Trical shall submit an annual compliance certification report to the District and U.S. EPA, in a District approved format, no later than February 15 for the period of January 1 through December 31 of the preceding year. [District Rule 218]

This report shall include a written statement from the responsible official which certifies the truth, accuracy, and completeness of the report and shall include at a minimum:

- A) identification of each term or condition of the permit that is the basis of the certification; and
- B) the compliance status; and

- C) whether compliance was continuous or intermittent; and
- D) the method(s) used for determining the compliance status of the source, currently and over the reporting period.

GENERAL CONDITIONS

21. Trical shall comply with all conditions of this federal operating permit. Any noncompliance with a permit condition constitutes a violation of the Federal Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. [District Rule 218]
22. In an enforcement action, the fact that Trical would have to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit is not a defense. [District Rule 218]
23. This permit may be modified, revoked, reopened and reissued, or terminated for cause as determined by the District. The filing of a request by Trical for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 218]
24. This permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. [District Rule 218]
25. Trical 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, Trical shall also furnish to the District copies of records required to be retained by this permit. [District Rule 218]
26. For applicable requirements that will become effective during the permit term, Trical shall meet such requirements on a timely basis unless a more detailed schedule is expressly required by the applicable requirement. [District Rule 218]
27. Any document submitted to the District pursuant to this permit shall contain certification by the responsible official of truth, accuracy and completeness. All certifications shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Trical shall promptly, upon discovery, report to the District a material error or omission in these records, reports, plans, or other documents. [District Rule 218]
28. Trical shall report any violation of any requirement contained in this permit to the District within 96 hours after such occurrence. The violation report shall include the time intervals, date and magnitude of excess

emissions; nature and cause of the excess (if known), corrective actions and preventive measures adopted.
[District Rule 218]

29. Upon any administrative or judicial challenge, all the emission limits, specific and general conditions, monitoring, record keeping, and reporting requirements of this permit, except those being challenged, remain valid and must be complied with. [District Rule 218]
30. For this federal operating permit to remain valid through the permit term of five years from the date of issuance, Trical shall pay an annual emission fee based upon the requirements of District Rule 308.
[District Rule 218]
31. Trical shall have available at the facility at all times a copy of this federal operating permit. [District Rule 218]
32. For protection from enforcement action based upon an emergency, as defined in District Rule 218, the responsible official for Trical shall submit to the District relevant evidence which demonstrates [District Rule 218]:
 - A) an emergency occurred; and
 - B) that Trical can identify the cause(s) of the emergency; and
 - C) that the facility was being properly operated at the time of the emergency; and
 - D) that all steps were taken to minimize the emissions resulting from the emergency; and
 - E) within two working days of the emergency event, Trical provided the District with a description of the emergency and any mitigating or corrective actions taken.
33. Upon presentation of credentials, Trical shall allow the District, the ARB, the EPA, or an authorized representative, to perform the following [District Rule 218]:
 - A) enter upon the premises where the federal operating permit source is located or in which any records are required to be kept under the terms and conditions of this federal operating permit;
 - B) to have access to and copy any records required to be kept under the terms and conditions of this federal operating permit;
 - C) to inspect any equipment, operation, or process described or required in this federal operating permit; and,
 - D) to sample emissions from the source.
