

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

ENGINEERING AND COMPLIANCE

APPLICATION PROCESSING AND CALCULATION

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PROCESSED BY: MS
CHECKED BY: DR

PERMIT TO OPERATE

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. 444632

GRANULE/SAND STORAGE AND HANDLING SYSTEM CONSISTING OF:

1. RECEIVING HOPPER (D78), TRUCK UNLOADING
2. ENCLOSED SCREW CONVEYOR (D79)
3. SURGE BIN, (D34), WITH FILTERED VENT.
4. BUCKET ELEVATOR (D80)
5. TWO ~~THREE~~ STORAGE SILOS, (D20, D22, ~~D24~~), SAND OR GRANULES. EACH 10'-0" DIA X 45'-0" H, EACH WITH FILTERED VENT.

APPLICATION NO. 450893 - CANCELLED

~~AIR POLLUTION CONTROL SYSTEM CONSISTING OF:~~

- ~~1. DUST COLLECTOR (C82), UNITED AIR SPECIALISTS, MODEL NO. SFC4-2-H55, WITH FOUR CARTRIDGE FILTERS, FILTER AREA 1,020 SQ. FT., REVERSE PULSE~~
- ~~2. EXHAUST SYSTEM, WITH A 5-HP BLOWER, VENTING SAND UNLOADING AND CONVEYING SYSTEM.~~

APPLICATION NO. 449479

TITLE V/RECLAIM REVISION

PERMIT CONDITIONS: (SEE RECLAIM PERMIT)

BACKGROUND:

The applications were initially submitted for this process in 1998. The initial proposal to install a baghouse or related control on the sand delivery system was first made in 2005 based on some initial feedback from the district that Best Available Control Technology for the sand receiving and conveying system is a baghouse. The Permit to Construct was granted for the baghouse on September 9, 2012. After the PC was issued, the facility evaluated the process further and attempted to engineer an alternative system and designed a shroud for truck unloading which connects to the underground containment. Since this is not entirely enclosed and there are some stability issues with the design, it does not meet the district's BACT requirements. The district has proposed to limit the throughput so that PM10 emissions are less than 1 lb/day and BACT does not apply.

PERMIT CONDITIONS:

Throughput Condition C1.11 was updated. See permit

PROCESS DESCRIPTION:

This equipment will operate 52 wks/year, 7 days/week, 3 hrs/day. The sand handling/receiving system (Application 444632) consists of a receiving hopper, enclosed screw conveyor, bucket elevator, two storage silos, and surge bin. It is used to mechanically convey either sand or granules into a storage silo. Each silo is equipped with bin vents to control PM emissions. Either granules or sand is stored in each silo. The baghouse (A/N 450893) will not be installed to vent emissions from the sand unloading and conveying system so the baghouse application will be cancelled. Each delivery truck carries approximately 25 tons of sand. It takes approximately 90 minutes to unload the sand and approximately another 90 minutes to empty into the silo. In order for Best Available Control Technology not to apply, the system must achieve PM10 emissions less than 1 lb/day.

CALCULATIONS

Total PM Emission factor is taken from AP 42 Table 11.19.1-1 for Industrial Sand and Gravel Processing.

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Total PM Emission Factor (sand handling, transfer, storage with wet scrubber):
0.0013 lbs/ton

Assuming Wet Scrubber Control efficiency is 98%,

PM Emission factor = $.0013 / (1-.98) = 0.065$ lbs/ton

Assuming 50% PM = PM10,

PM10 emission factor = $0.065 (0.5) = 0.0325$ lbs/ton

Max Weight of Truck: 25 tons

Max # of Truck: 1 Trucks/day

Max Throughput Rate: 30 tons/day

Max Daily Emissions = 30 tons/day (0.0325 lbs/ton)
= **0.975 lbs/day**

30 Day Average: $0.975 \text{ lbs/day (30 days)} / 30 \text{ days} = \mathbf{0.975 \text{ lbs/day}}$

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: During our site inspections, there were visible emissions observed during truck unloading. The visible emissions during truck unloading were partially controlled by a new shroud over the release valve. We also

observed visible emissions during the conveying process. The emissions did not exceed Ringelmann 1 for more than 3 minutes in 1 hour. Compliance 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 405 – Solid Particulate Matter Weight:

A/N 444632: PM is under maximum discharge rate. Compliance is expected.

REG XIII – BACT:

A/N 444632 – Sand Granule Receiving, Conveying, Storage

Proposed Sand Granule/Receiving and Conveying System A/N 444632 expected to comply with BACT since emissions are under 1 lb/day. Storage silos will carry filter vents.

REG XIII – OFFSETS:

A/N 444632 – PM10 Emissions will increase by 1 lb/day. Facility is under the threshold. Offsets not required.

REG XIII – MODELING:

Modeling is not required as the PM10 emissions for the entire storage and receiving system are less than the .41 lbs/hr specified in appendix A of Rule 1303.

Reg XXX - Title V Permits: 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; therefore, I recommend a Permit Operate be issued to sand receiving and storage system (A/N 444632) and cancellation of the baghouse (A/N 450893).