

Bay Area Air Quality Management District

939 Ellis Street
San Francisco, CA 94109
(415) 771-6000

Proposed

MAJOR FACILITY REVIEW PERMIT

Issued To:
Morton Salt
Facility # A0079

Facility Address:
7380 Morton Avenue
Newark, CA 94560

Mailing Address:
7380 Morton Avenue
Newark, CA 94560

Responsible Official
Douglas P. Robinson
Facilities Manager
(510) 797-2281

Facility Contact
Arsenia G. Abutin
Quality Control/Environmental Coordinator
(510) 797-2281

Type of Facility: Salt Manufacturing
Primary SIC: 2899
Product: Salt Products

BAAQMD Permit Division Contact:
M.K. Carol Lee

ISSUED BY THE BAY AREA AIR QUALITY MANAGEMENT DISTRICT

Ellen Garvey, Air Pollution Control Officer/Executive Officer

Date

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I. STANDARD CONDITIONS

A. Administrative Requirements

The permit holder shall comply with all applicable requirements in the following regulations:

BAAQMD Regulation 1 - General Provisions and Definitions

(as amended by the District Board on 5/17/00);

SIP Regulation 1 - General Provisions and Definitions

(as approved by EPA through 8/27/99);

BAAQMD Regulation 2, Rule 1 - Permits, General Requirements

(as amended by the District Board on 5/17/00);

SIP Regulation 2, Rule 1 - Permits, General Requirements

(as approved by EPA through 2/25/99);

BAAQMD Regulation 2, Rule 2 - Permits, New Source Review

(as amended by the District Board on 5/17/00);

SIP Regulation 2, Rule 2 - Permits, New Source Review and Prevention of Significant Deterioration

(as approved by EPA through 2/25/99);

BAAQMD Regulation 2, Rule 4 - Permits, Emissions Banking

(as amended by the District Board on 5/17/00); and

SIP Regulation 2, Rule 4 - Permits, Emissions Banking

(as approved by EPA through 2/25/99).

BAAQMD Regulation 2, Rule 6 - Permits, Major Facility Review

(as amended by the District Board on 10/20/99).

B. Conditions to Implement Regulation 2, Rule 6, Major Facility Review

1. This Major Facility Review Permit was issued on [] and expires on [when issued, enter 5th anniversary of issue date]. The permit holder shall submit a complete application for renewal of this Major Facility Review Permit no later than [when issued, enter date 6 months prior to permit expiration date] and no earlier than [when issued, enter date 12 months prior to expiration date]. **If a complete application for renewal has not been submitted in accordance with these deadlines, the facility may not operate after** [when issued, enter 5th anniversary of issue date]. (Regulation 2-6-307, 404.2, & 409.6; MOP Volume II, Part 3, §4.2)
2. The permit holder shall comply with all conditions of this permit. The permit consists of this document and all appendices. Any non-compliance with the terms and conditions of this permit will constitute a violation of the law and will be grounds for enforcement action; permit termination, revocation and re-issuance, or modification; or denial of a permit renewal application. (Regulation 2-6-307; MOP Volume II, Part 3, §4.11)
3. In the event any enforcement action is brought as a result of a violation of any term or condition of this permit, the fact that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with such term or condition shall not be a defense to such enforcement action. (MOP Volume II, Part

I. Standard Conditions

- 3, §4.11)
4. This permit may be modified, revoked, reopened and reissued, or terminated for cause. (Regulation 2-6-307, 409.8, 415; MOP Volume II, Part 3, §4.11)
 5. The filing of a request by the facility for a permit modification, revocation and re-issuance, or termination, or of a notification of planned changes or anticipated non-compliance does not stay the applicability of any permit condition. (Regulation 2-6-409.7; MOP Volume II, Part 3, §4.11)
 6. This permit does not convey any property rights of any sort, nor any exclusive privilege. (Regulation 2-6-409.7; MOP Volume II, Part 3, §4.11)
 7. The permit holder shall supply within 30 days any information that the District requests in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. (Regulation 1-441, Regulation 2-6-409.4 & 501; MOP Volume II, Part 3, §4.11)
 8. Any records required to be maintained pursuant to this permit which the permittee considers to contain proprietary or trade secret information shall be prominently designated as such. Copies of any such proprietary or trade secret information which are provided to the District shall be maintained by the District in a locked confidential file, provided, however, that requests from the public for the review of any such information shall be handled in accordance with the District's procedures set forth in Section 11 of the District Administrative Code. (Regulation 2-6-419; MOP Volume II, Part 3, §4.11)
 9. Proprietary or trade secret information provided to EPA will be subject to the requirements of 40 CFR Part 2, Subpart B - Public Information, Confidentiality of Business Information. (40 CFR Part 2)
 10. The emissions inventory submitted with the application for this Major Facility Review Permit is an estimate of actual emissions for the time period stated and is included only as one means of determining applicable requirements for emission sources. It does not establish, or constitute a basis for establishing, any new emission limitations. (MOP Volume II, Part 3, §4.11)

C. Requirement to Pay Fees

The permit holder shall pay annual fees in accordance with District Regulation 3, including Schedule P. (Regulation 2-6-402 & 409.13, Regulation 3; MOP Volume II, Part 3, §4.12)

D. Inspection and Entry

Access to Facility: The permit holder shall provide reasonable access to the facility and equipment which is subject to this permit to the APCO and/or to his or her designee. (Regulation 1-440, Regulation 2-6-409.3; MOP Volume II, Part 3, §4.14)

I. Standard Conditions

E. Records

Notwithstanding the specific wording in any requirement, all records for federally enforceable requirements shall be maintained for at least five years from the date of entry. (Regulation 2-6-501, Regulation 3; MOP Volume II, Part 3, §4.7)

F. Monitoring Reports

Reports of all required monitoring must be submitted to the District at least once every six months, except where an applicable requirement specifies more frequent reporting. The first reporting period for this permit shall be [date of issuance] to [six months later]. The report shall be submitted by [one month after end of reporting period]. Subsequent reports shall be for the following periods: [____ 1st through ____ 30th or 31st] and [____ 1st through ____ 30th or 31st], and are due on the last day of the month after the end of the reporting period. All instances of non-compliance shall be clearly identified in these reports. The reports shall be certified by the responsible official as true, accurate, and complete. In addition, all instances of non-compliance with the permit shall be reported in writing to the District's Compliance and Enforcement Division within 10 calendar days of the discovery of the incident. Within 30 calendar days of the discovery of any incident of non-compliance, the facility shall submit a written report including the probable cause of non-compliance and any corrective or preventative actions. (Regulation 2-6-502, Regulation 3; MOP Volume II, Part 3, §4.7)

G. Compliance Certification

Compliance certifications shall be submitted annually by the responsible official of this facility to the Bay Area Air Quality Management District and to the Environmental Protection Agency. The certification period will be _____ 1st to _____ 30th or 31st. The certification shall be submitted by _____ 30th or 31st of each year. The certification must list each applicable requirement, the compliance status, whether compliance was continuous or intermittent, the method used to determine compliance, and any other specific information required by the permit. The permit holder may satisfy this requirement through submittal of District-generated Compliance Certification forms. The certification should be directed to the District's Compliance and Enforcement Division, and a copy of the certification should be sent to the Environmental Protection Agency at the following address:

Director of the Air Division
USEPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105
Attention: Air-3

(MOP Volume II, Part 3, §4.5 and 4.15)

I. Standard Conditions

H. Emergency Provisions

1. The permit holder may seek relief from enforcement action in the event of a breakdown, as defined by Regulation 1-208 of the District's Rules and Regulations, by following the procedures contained in Regulations 1-431 and 1-432. The District will thereafter determine whether breakdown relief will be granted in accordance with Regulation 1-433. (MOP Volume II, Part 3, §4.8)
2. The permit holder may seek relief from enforcement action for a violation of any of the terms and conditions of this permit caused by conditions beyond the permit holder's reasonable control by applying to the District's Hearing Board for a variance pursuant to Health and Safety Code Section 42350. The Hearing Board will determine after notice and hearing whether variance relief should be granted in accordance with the procedures and standards set forth in Health and Safety Code Section 42350 et seq. Any variance granted by the Hearing Board from any term or condition of this permit which lasts longer than 90 days will be subject to EPA approval. (MOP Volume II, Part 3, §4.8)
3. Notwithstanding the foregoing, the granting by the District of breakdown relief or the issuance by the Hearing Board of a variance will not provide relief from federal enforcement. (MOP Volume II, Part 3, §4.8)

I. Severability

In the event that any provision of this permit is invalidated by a court or tribunal of competent jurisdiction, or by the Administrator of the EPA, all remaining portions of the permit shall remain in full force and effect. (Regulation 2-6-409.5; MOP Volume II, Part 3, §4.10)

J. Miscellaneous Conditions

1. The maximum capacity for each source as shown in Table II-A is the maximum allowable capacity. Exceedance of the maximum allowable capacity for any source is a violation of Regulation 2, Rule 1, Section 301. (Regulation 2-1-301)

II. Equipment

II. EQUIPMENT

Table II A - Permitted Sources

Each of the following sources has been issued a permit to operate pursuant to the requirements of BAAQMD Regulation 2, Permits. The capacities in this table are the maximum allowable capacities for each source, pursuant to Standard Condition I.J and Regulation 2-1-301.

S#	Description	Make or Type	Model	Capacity
S2	Block Forming Press	Custom Made	N/A	N/A
S3	Fifth Floor Vacuum Mill	Custom Made	N/A	40 ton/hr max
S4	Second Floor Process Systems	Custom Made	N/A	N/A
S7	Industrial Boiler No. 1 (natural gas, diesel oil)	Nebraska NS-C-53, multi-fuel, equipped with a low-NOx burner and 15% flue gas recirculation	NS-C-53	55 MMBTU/hr
S8	Vacuum Salt Processing System	Custom Made	N/A	N/A
S9	Vacuum Salt Rotary Cooler	Custom Made	N/A	N/A
S10	Solar Slat Rotary Cooler	Custom Made	N/A	N/A
S12	Pellet Products Process System	Custom Made	N/A	N/A
S13	Storage Silos and Conveyors	Custom Made	N/A	N/A
S14	Fifth Floor Hummer Screens-Solar Mills	Custom Made	N/A	N/A
S15	Solar Salt Rotary Dryer (natural gas, propane)	Custom Made, natural gas fired	N/A	11 MMBTU/hr
S16	Industrial Boiler No. 2 (natural gas, diesel oil)	Custom Made, multi-fuel, equipped with low-NOx burner and 15% flue gas recirculation	N/A	38 MMBTU/hr
S20	Waste Salt Sump	Custom Made	N/A	N/A
S21	Bulk Loading	Custom Made	N/A	N/A
S22	Filter Wheel No. 2	Custom Made	N/A	N/A
S25	Fifth Floor Elevators and Screw Conveyors-Solar Mills	Custom Made	N/A	N/A

II. Equipment

Table II A - Permitted Sources

Each of the following sources has been issued a permit to operate pursuant to the requirements of BAAQMD Regulation 2, Permits. The capacities in this table are the maximum allowable capacities for each source, pursuant to Standard Condition I.J and Regulation 2-1-301.

S#	Description	Make or Type	Model	Capacity
S26	Fourth Floor Bins and Roll Mill-Solar Mill	Custom Made	N/A	N/A
S28	Paint Spray Booth Operation	Custom Made with two HVLP guns	N/A	N/A
S29	Tubwinder Flame Bonding System (natural gas)	Custom Made	N/A	N/A

Table II B - Abatement Devices

A#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Limit or Efficiency
A2	Multicyclone	S2	Regulation 6-301, 6-310, and 6-311	pressure drop shall be > 0.1 inch water column and < 15 inches of water column	0.15 gr/dscf
A9	Air Wet Scrubber	S9	Regulation 6-301, 6-310, and 6-311	pressure drop shall be > 0.1 inch water column and < 15 inches of water column	0.15 gr/dscf
A10	Air Wet Scrubber	S10	Regulation 6-301, 6-310, and 6-311	pressure drop shall be > 0.1 inch water column and < 15 inches of water column	0.15 gr/dscf
A13	Air Wet Scrubber	S13	Regulation 6-301, 6-310, and 6-311	pressure drop shall be > 0.1 inch water column and < 15 inches of water column	0.15 gr/dscf

II. Equipment

Table II B - Abatement Devices

A#	Description	Source(s) Controlled	Applicable Requirement	Operating Parameters	Limit or Efficiency
A14	Centrifugal Wet Scrubber	S14	Regulation 6-301, 6-310, and 6-311	pressure drop shall be > 0.1 inch water column and < 15 inches of water column	0.15 gr/dscf
A15	Air Wet Scrubber	S15	Regulation 6-301, 6-310, and 6-311	pressure drop shall be > 0.1 inch water column and < 15 inches of water column	0.15 gr/dscf
A22	Air Wet Scrubber	S22	Regulation 6-301, 6-310, and 6-311	pressure drop shall be > 0.1 inch water column and < 15 inches of water column	0.15 gr/dscf
A25	Centrifugal Wet Scrubber	S25	Regulation 6-301, 6-310, and 6-311	pressure drop shall be > 0.1 inch water column and < 15 inches of water column	0.15 gr/dscf
A26	Centrifugal Wet Scrubber	S26	Regulation 6-301, 6-310, and 6-311	pressure drop shall be > 0.1 inch water column and < 15 inches of water column	0.15 gr/dscf
A27	Wet Centrifugal Collector	S3, S8	Regulation 6-301, 6-310, and 6-311	pressure drop shall be > 0.1 inch water column and < 15 inches of water column	0.15 gr/dscf
A28	Wet Centrifugal Collector	S12	Regulation 6-301, 6-310, and 6-311	pressure drop shall be > 0.1 inch water column and < 15 inches of water column	0.15 gr/dscf

II. Equipment

Table II B - Abatement Devices

A#	Description	Source(s) Controlle d	Applicable Requirement	Operating Parameters	Limit or Efficiency
A29	Air Wet Scrubber	S9	Regulation 6-301, 6-310, and 6-311	pressure drop shall be > 0.1 inch water column and < 15 inches of water column	0.15 gr/dscf
A30	Scrubber	S4, S21	Regulation 6-301, 6-310, and 6-311	pressure drop shall be > 0.1 inch water column and < 15 inches of water column	0.15 gr/dscf

III. GENERALLY APPLICABLE REQUIREMENTS

The permit holder shall comply with all applicable requirements, including those specified in the BAAQMD and SIP Rules and Regulations and other federal requirements cited below. These requirements apply in a general manner to the facility and/or to sources exempt from the requirement to obtain a District Permit to Operate. The District has determined that these requirements would not be violated under normal, routine operations, and that no additional periodic monitoring or reporting to demonstrate compliance is warranted. In cases where a requirement, in addition to being generally applicable, is also specifically applicable to one or more sources, the requirement and the source are also included in Section IV, Source-Specific Applicable Requirements, of this permit.

The dates in parenthesis in the Title column identify the versions of the regulations being cited and are, as applicable:

1. BAAQMD regulation(s): The date(s) of adoption or most recent amendment of the regulation by the District Board
2. Any federal requirement, including a version of a District regulation that has been approved into the SIP: The most recent date of EPA approval of any portion of the rule, encompassing all actions on the rule through that date

The full language of SIP requirements is included in Appendix A of this permit if the SIP requirement is different from the current BAAQMD requirement.

NOTE:

There are differences between the current BAAQMD rule and the version of the rule in the SIP. For specific information, contact the District’s Rule Development Section of the Enforcement Division. All sources must comply with both versions of the rule until US EPA has reviewed and approved (or disapproved) the District’s revision of the regulation.

**Table III
 Generally Applicable Requirements**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)
BAAQMD Regulation 1	General Provisions and Definitions (5/17/00)	N
SIP Regulation 1	General Provisions and Definitions (8/27/99)	Y
BAAQMD Regulation 4	Air Pollution Episode Plan (3/20/91)	N
SIP Regulation 4	Air Pollution Episode Plan (8/06/90)	Y
BAAQMD Regulation 5	Open Burning (11/2/94)	N
BAAQMD Regulation 6	Particulate Matter and Visible Emissions (12/19/90)	N
BAAQMD Regulation 7	Odorous Substances (3/17/82)	N

III. Generally Applicable Requirements

Table III
Generally Applicable Requirements

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)
BAAQMD Regulation 8, Rule 1	Organic Compounds - General Provisions (6/15/94)	Y
BAAQMD Regulation 8, Rule 3	Organic Compounds - Architectural Coatings (12/20/95)	Y
BAAQMD Regulation 8, Rule 49	Organic Compounds - Aerosol Paint Products (12/20/95)	N
SIP Regulation 8, Rule 49	Organic Compounds - Aerosol Paint Products (3/22/95)	Y
BAAQMD Regulation 8, Rule 51	Organic Compounds - Adhesive and Sealant Products (12/20/95)	N
BAAQMD Regulation 11, Rule 2	Hazardous Pollutants - Asbestos Demolition, Renovation and Manufacturing (12/4/91)	Y
BAAQMD Regulation 12, Rule 4	Miscellaneous Standards of Performance - Sandblasting (7/11/90)	Y
EPA Regulation 40 CFR 82	Protection of Stratospheric Ozone (2/21/95)	
Subpart F, 40 CFR 82.156	Leak Repair	Y
Subpart F, 40 CFR 82.161	Certification of Technicians	Y
Subpart F, 40 CFR 82.166	Records of Refrigerant	Y

IV. SOURCE-SPECIFIC APPLICABLE REQUIREMENTS

The permit holder shall comply with all applicable requirements, including those specified in the BAAQMD and SIP Rules and Regulations and other federal requirements cited below. The requirements cited in the following tables apply in a specific manner to the indicated source(s).

The dates in parenthesis in the Title column identify the versions of the regulations being cited and are, as applicable:

1. BAAQMD regulation(s): The date(s) of adoption or most recent amendment of the regulation by the District Board
2. Any federal requirement, including a version of a District regulation that has been approved into the SIP: The most recent date of EPA approval of any portion of the rule, encompassing all actions on the rule through that date

The full text of each permit condition cited is included in Section VI, Permit Conditions, of this permit. The full language of SIP requirements is included in Appendix A of this permit if the SIP requirements are different from the current BAAQMD requirements. All other text may be found in the regulations themselves.

Table IV - A
Source-specific Applicable Requirements
S2, BLOCK FORMING PRESS
S4, SECOND FLOOR PROCESS SYSTEM
S9, VACUUM SALT ROTARY COOLER
S10, SOLAR SALT ROTARY COOLER
S13, STORAGE SILOS AND CONVEYORS
S14, FIFTH FLOOR HUMMER SCREENS-SOLAR MILL
S21, BULK LOADING
S25, FIFTH FLOOR ELEVATORS AND SCREW CONVEYORS-SOLAR MILL
S26, FOURTH FLOOR BINS AND ROLL MILL-SOLAR MILL

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 6	Particulate Matter and Visible Emissions (12/19/90)		
6-301	Ringelmann No. 1 Limitation	Y	
6-305	Visible Particles	Y	
6-310	Particulate Weight Limitation	Y	

IV. Source-specific Applicable Requirements

Table IV - A
Source-specific Applicable Requirements
S2, BLOCK FORMING PRESS
S4, SECOND FLOOR PROCESS SYSTEM
S9, VACUUM SALT ROTARY COOLER
S10, SOLAR SALT ROTARY COOLER
S13, STORAGE SILOS AND CONVEYORS
S14, FIFTH FLOOR HUMMER SCREENS-SOLAR MILL
S21, BULK LOADING
S25, FIFTH FLOOR ELEVATORS AND SCREW CONVEYORS-SOLAR MILL
S26, FOURTH FLOOR BINS AND ROLL MILL-SOLAR MILL

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
6-311	Process Weight Rate	Y	
BAAQMD Condition # 17281			
Part 1	Pressure Drop (basis: 2-6-409.2)	Y	
Part 2	Recordkeeping (basis: 2-6-409.2)	Y	

Table IV - B
Source-specific Applicable Requirements
S3 FIFTH FLOOR VACUUM MILL

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 6	Particulate Matter and Visible Emissions (12/19/90)		
6-301	Ringelmann No. 1 Limitation	Y	
6-305	Visible Particles	Y	
6-310	Particulate Weight Limitation	Y	
6-311	Process Weight Rate	Y	
BAAQMD Condition # 16599			
Part 1	A27 abates S3 (basis: 6-301, 6-310, 6-311, Cumulative Increase)	Y	
Part 2	Maintenance (basis: 6-301, 6-310, 6-311, Cumulative Increase)	Y	

IV. Source-specific Applicable Requirements

Table IV - B
Source-specific Applicable Requirements
S3 FIFTH FLOOR VACUUM MILL

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
Part 3	Inspection (basis: 2-6-409.2)	Y	
Part 4	Recordkeeping (basis: 2-6-409.2)	Y	

Table IV - C
Source-specific Applicable Requirements
S7, INDUSTRIAL BOILER NO. 1
S16, INDUSTRIAL BOILER NO. 2

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 6	Particulate Matter and Visible Emissions (12/19/90)		
6-301	Ringelmann No. 1 Limitation	Y	
6-305	Visible Particles	Y	
6-310	Particulate Weight Limitation	Y	
6-310.3	Particulate Weight Limitation, Heat Transfer Operation	Y	
6-401	Appearance of Emissions	Y	
BAAQMD Regulation 9, Rule 1	Inorganic Gaseous Pollutants - Sulfur Dioxide (3/15/95)		
9-1-301	Limitations on Ground Level Concentrations	Y	
9-1-302	General Emission Limitations	Y	
9-1-304	Fuel Burning (Liquid and Solid Fuels)	Y	
BAAQMD Regulation 9, Rule 7	Inorganic Gaseous Pollutants - Nitrogen Oxides and Carbon Monoxide from Industrial, Institutional, and Commercial Boilers, Steam Generators, and Process Heaters (9/15/93)		
9-7-301	Emission Limits-Gaseous Fuel	Y	
9-7-301.1	Emission Limits-NOx	Y	
9-7-301.2	Emission Limits-CO	Y	
9-7-302	Emission Limits-Non-Gaseous Fuel	Y	
9-7-302.1	Emission Limits-NOx	Y	
9-7-302.2	Emission Limits-CO	Y	
9-7-303	Emission Limits-Gaseous and Non-Gaseous Fuel	Y	
9-7-305	Emission Limits-Natural Gas Curtailment-Non-Gaseous Fuel	Y	

IV. Source-specific Applicable Requirements

Table IV - C
Source-specific Applicable Requirements
S7, INDUSTRIAL BOILER NO. 1
S16, INDUSTRIAL BOILER NO. 2

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
9-7-305.1	Emission Limits-NOx	Y	
9-7-305.2	Emission Limits-CO	Y	
9-7-306	Emission Limit - Equipment Testing-Non-Gaseous Fuel	Y	
9-7-306.1	Emission Limits-NOx	Y	
9-7-306.2	Emission Limits-CO	Y	
9-7-306.3	Equipment Testing Limit	Y	
9-7-503	Records	Y	
9-7-503.2	Records of natural gas curtailment	Y	
9-7-503.3	Records of equipment testing	Y	
9-7-503.4	Source test records	Y	
9-7-603	Compliance Determination	Y	
BAAQMD Condition #17282			
Part 1	Annual Source Test Requirement (basis: 2-6-409.2)	Y	
Part 2	Fuel Oil Sulfur Content Certification (basis: 2-6-409.2)	Y	
Part 3	Visible Emissions Monitoring for Fuel Oil Combustion (basis: 2-6-409.2)	Y	
Part 4	Records of Visible Emissions Monitoring for Fuel Oil Combustion (basis: Regulation 2-6-409.2)	Y	

Table IV - D
Source-specific Applicable Requirements
S8, VACUUM SALT PROCESS SYSTEM

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 6	Particulate Matter and Visible Emissions (12/19/90)		
6-301	Ringelmann No. 1 Limitation	Y	
6-305	Visible Particles	Y	

IV. Source-specific Applicable Requirements

Table IV - D
Source-specific Applicable Requirements
S8, VACUUM SALT PROCESS SYSTEM

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
6-310	Particulate Weight Limitation	Y	
6-311	Process Weight Rate	Y	
BAAQMD Condition # 6130			
Part 1	S8 to be Abated by A27 (basis: 6-301, 6-310, 6-311, Cumulative Increase)	Y	
Part 2	Maintenance (basis: 6-301, 6-310, 6-311, Cumulative Increase)	Y	
Part 3	Pressure Drop (basis: 2-6-409.2)	Y	
Part 4	Recordkeeping (basis: 2-6-409.2)	Y	

Table IV - E
Source-specific Applicable Requirements
S12, PELLET PRODUCTS PROCESS SYSTEM

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 6	Particulate Matter and Visible Emissions (12/19/90)		
6-301	Ringelmann No. 1 Limitation	Y	
6-305	Visible Particles	Y	
6-310	Particulate Weight Limitation	Y	
6-311	Process Weight Rate	Y	
BAAQMD Condition # 6131			
Part 1	S12 to be Abated by A28 (basis: 6-301, 6-310, 6-311, Cumulative Increase)	Y	
Part 2	Maintenance (basis: 6-301, 6-310, 6-311, Cumulative Increase)	Y	
Part 3	Pressure Drop (basis: 2-6-409.2)	Y	
Part 4	Recordkeeping (basis: 2-6-409.2)	Y	

IV. Source-specific Applicable Requirements

Table IV - E
Source-specific Applicable Requirements
S15, SOLAR SALT ROTARY DRYER

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 6	Particulate Matter and Visible Emissions (12/19/90)		
6-301	Ringelmann No. 1 Limitation	Y	
6-305	Visible Particles	Y	
6-310	Particulate Weight Limitation	Y	
6-311	Process Weight Rate	Y	
BAAQMD Condition # 16147			
Part 1	Maximum Natural Gas Firing Rate (basis: Cumulative Increase)	Y	
Part 2	Ringelmann Limit (basis: BACT, Cumulative Increase)	Y	
Part 3	Natural Gas Usage Limit (basis: Cumulative Increase)	Y	
Part 4	Recordkeeping (basis: Cumulative Increase)	Y	
Part 5	Pressure Drop (basis: 2-6-409.2)	Y	
Part 6	Recordkeeping (basis: 2-6-409.2)	Y	

Table IV - F
Source-specific Applicable Requirements
S20, WASTE SALT SUMP

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 6	Particulate Matter and Visible Emissions (12/19/90)		
6-301	Ringelmann No. 1 Limitation	Y	
6-305	Visible Particles	Y	
6-310	Particulate Weight Limitation	Y	

IV. Source-specific Applicable Requirements

Table IV - F
Source-specific Applicable Requirements
S20, WASTE SALT SUMP

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
6-311	Process Weight Rate	Y	
BAAQMD Condition # 17283			
Part 1	Inspection (basis: 2-6-409.2)	Y	
Part 2	Recordkeeping (basis: 2-6-409.2)	Y	

Table IV - G
Source-specific Applicable Requirements
S22, FILTER WHEEL NO. 2

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 6	Particulate Matter and Visible Emissions (12/19/90)		
6-301	Ringelmann No. 1 Limitation	Y	
6-305	Visible Particles	Y	
6-310	Particulate Weight Limitation	Y	
6-311	Process Weight Rate	Y	
BAAQMD Condition # 15255			
Part 1	Material Throughput and Recordkeeping (basis: Cumulative Increase)	Y	
Part 2	S22 Abated by A22 (basis: Cumulative Increase)	Y	
Part 3	Abatement Device Monitoring Program (basis: BACT)	Y	
Part 4	Addition of Mist Eliminator (basis: BACT)	Y	
Part 5	Inspection (basis: 2-6-409.2)	Y	
Part 6	Recordkeeping (basis: 2-6-409.2)	Y	

IV. Source-specific Applicable Requirements

**Table IV - H
 Source-specific Applicable Requirements
 S28, PAINT SPRAY BOOTH OPERATION**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 8, Rule 19	Organic Compounds – Surface Coating of Miscellaneous Metal Parts and Products		
8-19-302	Limits	Y	
8-19-302.2	Air-Dried	Y	
8-19-313	Spray Application Equipment Limitation	Y	
8-19-320	Solvent Evaporative Loss Minimization	Y	
BAAQMD Condition #11261			
Part 1	Usage (basis: Cumulative Increase)	Y	
Part 2	VOC Content (basis: 8-19-302.2, Cumulative Increase)	Y	
Part 3	Recordkeeping (basis: Cumulative Increase, Regulation 8-19-501)	Y	

**Table IV - I
 Source-specific Applicable Requirements
 S29, TUBWINDER FLAME BONDING SYSTEM**

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Regulation 6	Particulate Matter and Visible Emissions (12/19/90)		
6-301	Ringelmann No. 1 Limitation	Y	
6-305	Visible Particles	Y	
6-310	Particulate Weight Limitation	Y	
6-311	Process Weight Rate	Y	

IV. Source-specific Applicable Requirements

Table IV - I
Source-specific Applicable Requirements
S29, TUBWINDER FLAME BONDING SYSTEM

Applicable Requirement	Regulation Title or Description of Requirement	Federally Enforceable (Y/N)	Future Effective Date
BAAQMD Condition # 14247			
Part 1	Maximum Natural Gas Firing Rate(basis: Cumulative Increase)	Y	
Part 2	Maximum Throughput (basis: Cumulative Increase)	Y	
Part 3	Ringelmann 0.5 (basis: BACT, Cumulative Increase)	Y	
Part 4	Recordkeeping (basis: Cumulative Increase)	Y	
Part 5	Recordkeeping (basis: Cumulative Increase)	Y	
Part 6	Inspection (basis: 6-301, 6-310, 6-311, Regulation 2-6-409.2)	Y	
Part 7	Recordkeeping (basis: 2-6-409.2)	Y	

V. SCHEDULE OF COMPLIANCE

The permit holder shall comply with all applicable requirements cited in this permit. The permit holder shall also comply with applicable requirements that become effective during the term of this permit.

VI. PERMIT CONDITIONS

Any condition that is preceded by an asterisk is not federally enforceable.

Condition # 6130

For S - 8, VACUUM SALT PROCESSING SYSTEM:

~~These are additional conditions for the operation of S-8.~~

1. The exhaust from the Vacuum Salt Process System (S8) shall always be scrubbed by A27 before it is released to the ambient air. [Basis: Regulation 6-301, 6-310, 6-311, Cumulative Increase]
2. The scrubber (A27) shall be maintained in good working condition at all times that S8 is operating. [Basis: Regulation 6-301, 6-310, 6-311, Cumulative Increase]
3. The pressure drop across the scrubber abating this source shall not be less than 0.1 inch of water nor exceed 15 inches of water. [Regulation 2-6-409.2]
4. A District approved logbook shall be maintained on a weekly basis of the pressure drop across the scrubber. Records shall be retained for a period of at least 5 years from the date of entry and made readily available to District staff upon request. [Regulation 2-6-409.2]

Condition # 6131

For S - 12, PELLET PRODUCTS PROCESS SYSTEM

~~These are additional conditions for the operation of S-12.~~

1. The exhaust from the Pellet Products Process System (S-12) shall always be scrubbed by A28 before it is released to the ambient air. [Basis: Regulation 6-301, 6-310, 6-311, Cumulative Increase]
2. The scrubber (A28) shall be maintained in good working condition at all times that S12 is operating. [Basis: Regulation 6-301, 6-310, 6-311, Cumulative Increase]

V. Permit Conditions

Condition # 6131

For S - 12, PELLET PRODUCTS PROCESS SYSTEM

3. The pressure drop across the scrubber abating this source shall not be less than 0.1 inch of water nor exceed 15 inches of water. [Regulation 2-6-409.2]
4. A District approved logbook shall be maintained on a weekly basis of the pressure drop across the scrubber. Records shall be retained for a period of at least 5 years from the date of entry and made readily available to District staff upon request. [Regulation 2-6-409.2]

Condition # 11261

For S - 28, PAINT SPRAY BOOTH OPERATION

1. The usage of paint, and clean-up solvent at S28 shall not exceed the following limits per consecutive 12-month period:
 - a. Amerlock 400 Resin as applied = 330 gallons.
 - b. Amerlock 400 Cure as applied = 170 gallons.
 - c. Sherwin-Williams as applied = 50 gallons
 - d. Clean-up solvent, Amercoat (Product #12) = 300 gallons

Other paints, and clean-up solvents can be used if the owner/operator of the source, S28, can demonstrate to the satisfaction of APCO by record keeping including emission calculations that volatile organic compounds (VOC) emissions do not exceed 2986.5 pounds per year. [basis: Cumulative Increase]

2. The VOC content of paints to be used at this source shall not exceed 2.8 pounds/gallon of coating minus water and exempt solvents. [basis: Regulation 8-19-302.2, Cumulative Increase]
3. The owner/operator of S28 shall maintain records on a monthly basis for the following information in a District approved logbook:
 - a. current list of paints, thinners, and clean-up solvents along with product data sheet or MSDS;
 - b. amount of each coating applied;
 - c. amount of each solvent used for clean-up, surface preparation, and used as thinner;
 - d. manufacturer's recommended mix ratio of components;
 - e. coating and mix ratio of components in the coating used;
 - f. OC content of coating as applied.
 - g. OC emission calculations if paints and primers other than specified in item #1 are used.

V. Permit Conditions

These records shall be retained at the site for at least ~~two~~ five years from the date the data is recorded and shall be made available to the District staff upon request. [basis: Cumulative Increase, Regulation 2-6-409.2]

Condition # 14247

For S - 29, TUBWINDER FLAME BONDING SYSTEM

1. S29 shall be fired exclusively with natural gas, at a firing rate not to exceed 1.5 MMBTU/hr. [basis: Cumulative Increase]
2. No more than 85 million cans shall be processed per consecutive 12-month period at the flame bonding system, S29. [basis: Cumulative Increase]
3. The particulate emissions from S29 shall not exceed Ringelmann 0.5. [basis: BACT, Cumulative Increase]
4. The owner/operator of this source shall keep monthly records of the cans processed at this source in a District approved logbook to demonstrate compliance with condition part #2. The records shall be maintained for at least 24 months 5 years from the date of data recording, and be made available to the District staff for inspection upon request. [basis: Cumulative Increase, Regulation 2-6-409.2]
5. The usage of natural gas shall be recorded monthly and totaled on a consecutive 12-month basis in a District approved log and retained for at least two five years from the date of entry. The log shall be kept on site and made available to the District staff upon request. [basis: Cumulative Increase, Regulation 2-6-409.2]
6. The Tubwinder Flame Bonding System (S29) should be inspected monthly shall be checked for visible emissions monthly to ensure that is maintained in good operating condition and in compliance with Condition part 2. If any visible emissions are detected, the operator shall take corrective action within one week, and check for visible emissions after corrective action is taken. If no visible emissions are detected, the operator shall continue to check for visible emissions at the same frequency. (basis: Regulation 2-6-409.2)
7. The operator shall keep records of all visible emissions checks, the person performing the check, and all corrective action taken at S29 Tubwinder Flame Bonding System. The records shall be retained for five (5) years and shall be made available to District personnel upon request. (basis: Regulation 2-6-409.2)

V. Permit Conditions

Condition # 15255

For S - 22, Filter Wheel No. 2

1. The material throughput shall not exceed 165,000 tons per consecutive 12-month period. [basis: Cumulative Increase]

Material throughput at this source shall be recorded in a District approved logbook on a monthly basis, and totaled monthly to demonstrate compliance with this condition. These records shall be kept at the site for at least ~~2460 months~~ 5 years from the date the data is entered, and be made available to the District staff upon request. [basis: Cumulative Increase; Regulation 2-6-409.2]

2. The exhaust from S22 shall always be vented through A22 before being released to the ambient air. The scrubber with mist eliminator (A22) shall be maintained in good working condition at all times that S22 is operational. [basis: BACT]
3. Morton Salt shall develop an abatement device monitoring program, which will include daily monitoring of pressure drop and flow rate and, monthly sampling and measurement of salinity. The performance program shall have the approval of the BAAQMD. From these measurements, Morton Salt will determine the acceptable range of operating parameters. [basis: BACT]
4. Morton Salt shall install a York Vane Mist eliminator (style 7, with maximum of 3/8-inch spacing) in the existing scrubber (A22), prior to increasing the throughput above the pre-modification level at S22. [basis: BACT]
5. The pressure drop across the scrubber abating this source shall not be less than 0.1 inch of water nor exceed 15 inches of water. [Regulation 6-301, 6-310, 6-311, 2-6-409.2]
6. A District approved logbook shall be maintained on a weekly basis of the pressure drop across the scrubber. Records shall be retained for a period of at least 5 years from the date of entry and made available to District staff upon request. [Regulation 2-6-409.2]

V. Permit Conditions

Condition # 16147

For S - 15, Solar Salt Rotary Dryer

1. S15 shall be fired exclusively with natural gas (or propane), at a firing rate not to exceed 13.1 MMBTU/hr. [basis: Cumulative Increase]
2. The particulate emissions from S15 shall not exceed Ringelmann 0.5. [basis: BACT, Cumulative Increase]
3. Natural gas usage of S15 shall not exceed 700 therms per day and 250,000 therms during any consecutive twelve-month period. [basis: Cumulative Increase]
4. The usage of natural gas and fuel shall be recorded daily and monthly in a District approved log and retained for at least two five years from the date of entry. The log shall be kept on site and made available to the District staff upon request. [basis: Cumulative Increase; Regulation 2-6-409.2]
5. The pressure drop across the scrubber abating this source shall not be less than 0.1 inch of water nor exceed 15 inches of water. [Regulation 6-301, 6-310, 6-311, 2-6-409.2]
6. A District approved logbook shall be maintained on a weekly basis of the pressure drop across the scrubber. Records shall be retained for a period of at least 5 years from the date of entry and made readily available to District staff upon request. [Regulation 2-6-409.2]

Condition # 16559

For S - 3, Fifth Floor Vacuum Mill

1. Rotoclone Wet Scrubber (A27) shall abate the particulate matter emissions from this source (S3). [Basis: Regulation 6-301, 6-310, 6-311, Cumulative Increase]
2. Rotoclone Wet Scrubber (A27) shall be properly maintained and kept in good operating condition at all times. [Basis: Regulation 6-301, 6-310, 6-311, Cumulative Increase or Best Available Control Technology]
3. The Rotoclone Wet Scrubber (A27) shall be inspected monthly to ensure proper operation. ~~The following items shall be checked: [basis: Regulation 2-1-403]~~
 - ~~a. The ducting to the Rotoclone Wet Scrubber (A27) shall be checked for evidence of any tears, holes, abrasions, and scuffs, and repaired or replaced as needed. [basis: Regulation 2-1-403, 2-6-409.2]~~

V. Permit Conditions

Condition # 16559

For S - 3, Fifth Floor Vacuum Mill

4. ~~a~~In order to demonstrate compliance with the above permit conditions, the following records shall be maintained in a District approved log, the Permit Holder shall keep records of all inspections and all maintenance work including abatement device and/or ducting repair or replacement. Records of each inspection shall consist of a log containing the date of inspection and the initials of the personnel that inspects the Rotoclone Wet Scrubber (A27). These records shall be kept on site and made available for District inspection for a period of at least five years from the date on which a record is made. [basis Regulation 2-6-409.2]
 - a. ~~Records of all inspections and all maintenance work including abatement device and/or ducting repair or replacement. Records of each inspection shall consist of a log containing the date of inspection and the initials of the personnel that inspects the Rotoclone Wet Scrubber (A27).~~ [basis: Regulation 2-6-409.2]

Condition # 17281

For S2, BLOCK FORMING PRESS
S4, SECOND FLOOR PROCESS SYSTEM
S9, VACUUM SALT ROTARY COOLER
S10, SOLAR SALT ROTARY COOLER
S13, STORAGE SILOS AND CONVEYORS
S14, FIFTH FLOOR HUMMER SCREENS-SOLAR MILL
S21, BULK LOADING
S25, FIFTH FLOOR ELEVATORS AND SCREW CONVEYORS-SOLAR MILL
S26, FOURTH FLOOR BINS AND ROLL MILL-SOLAR MILL

1. The pressure drop across the scrubber abating these sources shall not be less than 0.1 inch of water nor exceed 15 inches of water. [Regulation 2-6-409.2]
2. A District approved logbook shall be maintained on a weekly basis of the pressure drop across the scrubber. Records shall be retained for a period of at least 5 years from the date of entry and made readily available to District staff upon request. [Regulation 2-6-409.2]

V. Permit Conditions

Condition # 17282

For S7, INDUSTRIAL BOILER NO. 1

S16, INDUSTRIAL BOILER NO. 2

1. A District approved source test shall be performed on an annual basis for each boiler to verify compliance with the NO_x and CO emission standards of Regulation 9-7-301 and 9-7-302. [basis: Regulation 2-6-409.2]
2. The sulfur content of the fuel oil shall be certified by the fuel oil vendor. [basis: Regulation 2-6-409.2]
3. S7 and S16 Boilers, shall be checked for visible emissions after combustion of one million gallons of fuel oil at each boiler. The visible emissions check shall take place while the equipment is operating and during daylight hours. If any visible emissions are detected, the operator shall take corrective action within one week, and check for visible emissions after corrective action is taken. If no visible emissions are detected, the operator shall continue to check for visible emissions at the same frequency. (basis: Regulation 2-6-409.2)
4. The operator shall keep records of all visible emissions checks, the person performing the check, and all corrective action taken at S7 and S16 Boilers. The records shall be retained for five (5) years and shall be made available to District personnel upon request. (basis: Regulation 2-6-409.2)

Condition # 17283

For S20, Waste Salt Sump

1. The S20 Waste Salt Sump shall be checked for visible emissions monthly. The visible emissions check shall take place while the equipment is operating and during daylight hours. If any visible emissions are detected, the operator shall take corrective action within one week, and check for visible emissions after corrective action is taken. If no visible emissions are detected, the operator shall continue to check for visible emissions at the same frequency. (basis: Regulation 2-6-409.2)
2. The operator shall keep records of all visible emissions checks, the person performing the check, and all corrective action taken at S20 Waste Salt Sump. The records shall be retained for five (5) years and shall be made available to District personnel upon request. (basis: Regulation 2-6-409.2)

VII. APPLICABLE LIMITS & COMPLIANCE MONITORING REQUIREMENTS

This section has been included only to summarize the applicable emission limits contained in Section IV, Source-Specific Applicable Requirements, of this permit. The following tables show the relationship between each emission limit and the associated compliance monitoring provisions, if any. The monitoring frequency indicates whether periodic (P) or continuous (C) monitoring is required. For periodic monitoring, the frequency of the monitoring has also been shown, either annual (A), quarterly (Q), monthly (M), daily (D), or on an event basis (E). No monitoring (N) has been required if the current applicable rule or regulation does not require monitoring, and the operation is unlikely to deviate from the applicable emission limit based upon the nature of the operation.

Table VI - A
Applicable Limits and Compliance Monitoring Requirements
S2, BLOCK FORMING PRESS
S4, SECOND FLOOR PROCESS SYSTEM
S9, VACUUM SALT ROTARY COOLER
S10, SOLAR SALT ROTARY COOLER
S13, STORAGE SILOS AND CONVEYORS
S14, FIFTH FLOOR HUMMER SCREENS-SOLAR MILL
S21, BULK LOADING
S25, FIFTH FLOOR ELEVATORS AND SCREW CONVEYORS-SOLAR MILL
S26, FOURTH FLOOR BINS AND ROLL MILL-SOLAR MILL

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
TSP	Regulation 6-301	Y		Ringelmann 1.0	BAAQMD Condition # 17281 Part 1	P/W	Pressure Drop monitoring
	Regulation 6-310	Y		0.15 grain/dscf @ 6% O ₂	BAAQMD Condition # 17281 Part 1	P/W	Pressure Drop monitoring
	Regulation 6-311	Y		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	BAAQMD Condition # 17281 Part 1	P/W	Pressure Drop monitoring

VII. Applicable Limits and Compliance Monitoring Requirements

Table VI - B
Applicable Limits and Compliance Monitoring Requirements
S3 FIFTH FLOOR VACUUM MILL

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
PM10	Regulation 6-301	Y		Ringelmann 1.0	BAAQMD Condition # 16599 Part 3	P/M	Visual Inspection
	Regulation 6-310	Y		0.15 grain/dscf @ 6% O ₂	BAAQMD Condition # 16599 Part 3	P/M	Visual Inspection
	Regulation 6-311	Y		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	BAAQMD Condition # 16599 Part 3	P/M	Visual Inspection

Table VI - C
Applicable Limits and Compliance Monitoring Requirements
S7, INDUSTRIAL BOILER NO. 1
S16, INDUSTRIAL BOILER NO. 2

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
TSP	BAAQMD D 6-301	Y		Ringelmann No. 1	BAAQMD Permit Condition # 17282 Part 3	P/every 1 million gal combusted	Visible emissions check
	BAAQMD D 6-310	Y		0.15 grain/dscf @ 6% O ₂	BAAQMD Permit Condition # 17282 Part 3	P/every 1 million gal combusted	Visible emissions check
NOX	BAAQMD D 9-7-301.1	Y		30 ppmv @3%O ₂ , dry	BAAQMD Condition # 17282 Part 1	P/A	Annual source test

VII. Applicable Limits and Compliance Monitoring Requirements

Table VI - C
Applicable Limits and Compliance Monitoring Requirements
S7, INDUSTRIAL BOILER NO. 1
S16, INDUSTRIAL BOILER NO. 2

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
NOx	BAAQM D 9-7-305.1	Y		150 ppmv @ 3% O ₂ , dry		N	
	BAAQM D 9-7-306.1	Y		150 ppmv @ 3% O ₂ , dry		N	
NOx	BAAQM D Cond. #13032, Part 1	Y		30 ppmv @ 3% O ₂ , dry	BAAQMD Condition # 17282 Part 1	P/A	Annual source test
CO	BAAQM D 9-7-301.2	Y		400 ppmv @ 3% O ₂ , dry	BAAQMD Condition # 17282 Part 1	P/A	Annual source test
CO	BAAQM D 9-7-305.2	Y		400 ppmv @ 3% O ₂ , dry		N	
	BAAQM D 9-7-306.2	Y		400 ppmv @ 3% O ₂ , dry		N	
SO ₂	BAAQM D 9-1-301	Y		GLC ¹ of 0.5 ppm for 3 min or 0.25 ppm for 60 min or 0.05 ppm for 24 hours		N	
	BAAQM D 9-1-302	Y		SO ₂ shall not exceed 300 ppm (dry)		N	
	BAAQM D 9-1-304	Y		Sulfur content of fuel <0.5% by weight	BAAQMD Permit Condition # 17282 Part 2	P/E	Fuel certification by vendor

¹ Ground Level Concentration

VII. Applicable Limits and Compliance Monitoring Requirements

Table VI – D
Applicable Limits and Compliance Monitoring Requirements
S8, VACUUM SALT PROCESS SYSTEM

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
TSP	Regulation 6-301	Y		Ringelmann 1.0	BAAQMD Condition # 6130 Part 3	P/W	Pressure Drop monitoring
	Regulation 6-310	Y		0.15 grain/dscf @ 6% O ₂	BAAQMD Condition # 6130 Part 3	P/W	Pressure Drop monitoring
	Regulation 6-311	Y		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	BAAQMD Condition # 6130 Part 3	P/W	Pressure Drop monitoring

Table VI – E
Applicable Limits and Compliance Monitoring Requirements
S12, PELLET PRODUCTS PROCESS SYSTEM

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
TSP	Regulation 6-301	Y		Ringelmann 1.0	BAAQMD Condition # 6131 Part 3	P/W	Pressure Drop monitoring
	Regulation 6-310	Y		0.15 grain/dscf @ 6% O ₂	BAAQMD Condition # 6131 Part 3	P/W	Pressure Drop monitoring
	Regulation 6-311	Y		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	BAAQMD Condition # 6131 Part 3	P/W	Pressure Drop monitoring

VII. Applicable Limits and Compliance Monitoring Requirements

Table VI – E
Applicable Limits and Compliance Monitoring Requirements
S15, SOLAR SALT ROTARY DRYER

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
TSP	Regulation 6-301	Y		Ringelmann 1.0	BAAQMD Condition # 16147 Part 5	P/W	Pressure Drop monitoring
	Regulation 6-310	Y		0.15 grain/dscf @ 6% O ₂	BAAQMD Condition # 16147 Part 5	P/W	Pressure Drop monitoring
	Regulation 6-311	Y		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	BAAQMD Condition # 16147 Part 5	P/W	Pressure Drop monitoring
PM10	BAAQMD Condition # 16147 Part 2	Y		Ringelmann 0.5	BAAQMD Condition # 16147 Part 5	P/W	Pressure Drop monitoring

Table VI - F
Applicable Limits and Compliance Monitoring Requirements
S20, WASTE SALT SUMP

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
TSP	Regulation 6-301	Y		Ringelmann 1.0	BAAQMD Condition # 17283 Part 1	P/M	Visible emissions check
	Regulation 6-310	Y		0.15 grain/dscf @ 6% O ₂	BAAQMD Condition # 17283 Part 1	P/M	Visible emissions check

VII. Applicable Limits and Compliance Monitoring Requirements

Table VI - F
Applicable Limits and Compliance Monitoring Requirements
S20, WASTE SALT SUMP

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
	Regulation 6-311	Y		$4.10P^{0.67}$ lb/hr, where P is process weight, ton/hr	BAAQMD Condition # 17283 Part 1	P/M	Visible emissions check

VII. Applicable Limits and Compliance Monitoring Requirements

Table VI - G
Applicable Limits and Compliance Monitoring Requirements
S22, FILTER WHEEL NO. 2

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
TSP	Regulation 6-301	Y		Ringelmann 1.0	BAAQMD Condition # 15255 Part 4	P/W	Pressure Drop monitoring
	Regulation 6-310	Y		0.15 grain/dscf @ 6% O ₂	BAAQMD Condition # 15255 Part 4	P/W	Pressure Drop monitoring
	Regulation 6-311	Y		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	BAAQMD Condition # 15255 Part 4	P/W	Pressure Drop monitoring

Table VI - H
Applicable Limits and Compliance Monitoring Requirements
S28, PAINT SPRAY BOOTH OPERATION

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
VOC	Regulation 8-19-302.2	Y		340 g/l (2.8 lb/gal)	Regulation 8-19-501	P/E	Records
	BAAQMD Condition #11261 Part 1	Y		2986.6 lb/yr	BAAQMD Condition # 11261 Part 3	P/M	Records
	BAAQMD Condition #11261 Part 2	Y		2.8 lb/gal	Regulation 8-19-501; BAAQMD Condition # 11261 Part 3	P/E	Records

VII. Applicable Limits and Compliance Monitoring Requirements

VII. Applicable Limits and Compliance Monitoring Requirements

Table VI - I
Applicable Limits and Compliance Monitoring Requirements
S29, TUBWINDER FLAME BONDING SYSTEM

Pollutant	Emission Limit Citation	FE Y/N	Future Effective Date	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
TSP	Regulation 6-301	Y		Ringelmann 1.0	BAAQMD Condition # 14247 Part 6	P/M	Visible emissions check
	Regulation 6-310	Y		0.15 grain/dscf @ 6% O ₂	BAAQMD Condition # 14247 Part 6	P/M	Visible emissions check
	Regulation 6-311	Y		4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	BAAQMD Condition # 14247 Part 6	P/M	Visible emissions check
PM10	BAAQMD Condition # 14247 Part 3	Y		Ringelmann 0.5	BAAQMD Condition # 14247 Part 6	P/M	Visible emissions check

VIII. TEST METHODS

The test methods associated with the emission limit of a District regulation are generally referenced in Section 600 of the regulation. The following table indicates only the test methods associated with the emission limits referenced in Section VII, Applicable Emission Limits & Compliance Monitoring Requirements, of this permit.

**Table VIII
 Test Methods**

Applicable Requirement	Description of Requirement	Acceptable Test Methods
BAAQMD 6-301	Ringelmann No. 1 Limitation	Manual of Procedures, Volume I, Evaluation of Visible Emissions
BAAQMD 6-310	Particulate Weight Limitation	Manual of Procedures, Volume IV, ST-15, Particulates Sampling
BAAQMD 6-311	General Operations	Manual of Procedures, Volume IV, ST-15, Particulates Sampling
BAAQMD 8-19-302	Limits	Manual of Procedures, Volume III, Method 21, Determination of Compliance of Volatile Organic Compounds for Water Reducible Coatings or Manual of Procedures, Volume III, Method 22, Determination of Compliance of Volatile Organic Compounds for Solvent Based Coatings Manual of Procedures, Volume III, Method 31, Determination of Precursor Organic Compounds in Paint Strippers for Aerospace Assembly and Component Coating Operations
BAAQMD 8-11-302	Emission of VOC	Manual of Procedures, Volume IV, ST-7, Non-Methane Organic Carbon Sampling or EPA Method 25 or 25A.
BAAQMD 8-11-304	Emission of VOC	Manual of Procedures, Volume IV, ST-7, Non-Methane Organic Carbon Sampling or EPA Method 25 or 25A.
BAAQMD 9-1-302	General Emission Limitation	Manual of Procedures, Volume IV, ST-19A, Sulfur Dioxide, Continuous Sampling, or ST-19B, Total Sulfur Oxides Integrated Sample
BAAQMD 9-1-304	Fuel Burning (Liquid and Solid Fuels)	Manual of Procedures, Volume III, Method 10, Determination of Sulfur in Fuel Oils.
BAAQMD 9-7-301.1	NO _x Limitation	Manual of Procedures, Volume IV, ST-13A, Oxides of Nitrogen, Continuous Sampling and ST-14, Oxygen, Continuous Sampling

VIII. Test Methods

**Table VIII
 Test Methods**

Applicable Requirement	Description of Requirement	Acceptable Test Methods
BAAQMD 9-7-301.2	CO Limitation	Manual of Procedures, Volume IV, ST-6, Carbon Monoxide, Continuous Sampling and ST-14, Oxygen, Continuous Sampling
BAAQMD 9-7-305.1	NOx Limitation	Manual of Procedures, Volume IV, ST-13A, Oxides of Nitrogen, Continuous Sampling and ST-14, Oxygen, Continuous Sampling
BAAQMD 9-7-305.2	CO Limitation	Manual of Procedures, Volume IV, ST-6, Carbon Monoxide, Continuous Sampling and ST-14, Oxygen, Continuous Sampling
BAAQMD 9-7-306.1	NOx Limitation	Manual of Procedures, Volume IV, ST-13A, Oxides of Nitrogen, Continuous Sampling and ST-14, Oxygen, Continuous Sampling
BAAQMD 9-7-306.2	CO Limitation	Manual of Procedures, Volume IV, ST-6, Carbon Monoxide, Continuous Sampling and ST-14, Oxygen, Continuous Sampling
BAAQMD Condition # 14247 Part 3	Ringelmann No. 0.5 Limitation	Manual of Procedures, Volume I, Evaluation of Visible Emissions
BAAQMD Condition # 16147 Part 2	Ringelmann No. 0.5 Limitation	Manual of Procedures, Volume I, Evaluation of Visible Emissions

IX. PERMIT SHIELD

Not Applicable.

X. GLOSSARY

BAAQMD

Bay Area Air Quality Management District

BACT

Best Available Control Technology

CAA

The federal Clean Air Act

CAAQS

California Ambient Air Quality Standards

CEQA

California Environmental Quality Act

CFR

The Code of Federal Regulations. 40 CFR contains the implementing regulations for federal environmental statutes such as the Clean Air Act. Parts 50-99 of 40 CFR contain the requirements for air pollution programs.

CO

Carbon Monoxide

Cumulative Increase

The sum of permitted emissions from each new or modified source since a specified date pursuant to BAAQMD Rule 2-1-403, Permit Conditions (as amended by the District Board on 7/17/91) and SIP Rule 2-1-403, Permit Conditions (as approved by EPA on 6/23/95). Used to determine whether threshold-based requirements are triggered.

District

The Bay Area Air Quality Management District

EPA

The federal Environmental Protection Agency.

Excluded

Not subject to any District Regulations.

Federally Enforceable, FE

All limitations and conditions which are enforceable by the Administrator of the EPA including those requirements developed pursuant to 40 CFR Part 51, subpart I (NSR), Part 52.21 (PSD), Part 60, (NSPS), Part 61, (NESHAPs), Part 63 (HAP), and Part 72 (Permits Regulation, Acid Rain), and also including limitations and conditions contained in operating permits issued under

X. Glossary

an EPA-approved program that has been incorporated into the SIP.

HAP

Hazardous Air Pollutant. Any pollutant listed pursuant to Section 112(b) of the Act. Also refers to the program mandated by Title I, Section 112, of the Act and implemented by both 40 CFR Part 63, and District Regulation 2, Rule 5.

Major Facility

A facility with potential emissions of regulated air pollutants greater than or equal to 100 tons per year, greater than or equal to 10 tons per year of any single hazardous air pollutant, and/or greater than or equal to 25 tons per year of any combination of hazardous air pollutants, or such lesser quantity as determined by the EPA administrator.

MFR

Major Facility Review. The District's term for the federal operating permit program mandated by Title V of the Act and implemented by District Regulation 2, Rule 6.

MOP

The District's Manual of Procedures.

NAAQS

National Ambient Air Quality Standards

NESHAPs

National Emission Standards for Hazardous Air Pollutants. Contained in 40 CFR Part 61.

NMHC

Non-methane Hydrocarbons

NO_x

Oxides of nitrogen.

NSPS

Standards of Performance for New Stationary Sources. Federal standards for emissions from new stationary sources. Mandated by Title I, Section 111 of the Act, and implemented by both 40 CFR Part 60 and District Regulation 10.

NSR

New Source Review. A federal program for pre-construction review and permitting of new and modified sources of air pollutants for which the District is classified "non-attainment". Mandated by Title I of the Clean Air Act and implemented by 40 CFR Parts 51 and 52 as well as District Regulation 2, Rule 2. (Note: There are additional NSR requirements mandated by the California Clean Air Act.)

Offset Requirement

X. Glossary

A New Source Review requirement to provide federally enforceable emission offsets at a specified ratio for the emissions from a new or modified source and any pre-existing cumulative increase minus any onsite contemporaneous emission reduction credits. Applies to emissions of POC, NOx, PM10, and SO2.

Phase II Acid Rain Facility

A facility that generates electricity for sale through fossil-fuel combustion and by virtue of certain other characteristics (defined in Regulation 2, Rule 6) is subject to Titles IV and V of the Clean Air Act.

POC

Precursor Organic Compounds

PM

Total Particulate Matter

PM10

Particulate matter with aerodynamic equivalent diameter of less than or equal to 10 microns

PSD

Prevention of Significant Deterioration. A federal program for permitting new and modified sources of air pollutants for which the District is classified "attainment" of the National Air Ambient Quality Standards. Mandated by Title I of the Act and implemented by both 40 CFR Part 52 and District Regulation 2, Rule 2.

SIP

State Implementation Plan. State and District programs and regulations approved by EPA and developed in order to attain the National Air Ambient Quality Standards. Mandated by Title I of the Act.

SO2

Sulfur dioxide

Title V

Title V of the federal Clean Air Act. Requires a federally enforceable operating permit program for major and certain other facilities.

VOC

Volatile Organic Compounds

X. Glossary

Units of Measure:

bhp	=	brake-horsepower
btu	=	British Thermal Unit
g	=	grams
gal	=	gallon
hp	=	horsepower
hr	=	hour
lb	=	pound
in	=	inches
max	=	maximum
m ²	=	square meter
min	=	minute
mm	=	million
ppmv	=	parts per million, by volume
ppmw	=	parts per million, by weight
psia	=	pounds per square inch, absolute
psig	=	pounds per square inch, gauge
scfm	=	standard cubic feet per minute
yr	=	year

XI. APPLICABLE STATE IMPLEMENTATION PLAN

See Attachments