

Title V Permit Evaluation

Site Number: A0079

Application Number: 16475

Site Name: Morton Salt

Reviewing Engineer: MCL

Site Address: 7380 Morton Avenue, Newark, CA 94560

Periodic Monitoring:

TSP

Source #	Emission Limit Citation	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
S2, S4, S9, S10, S13, S14, S21, S25 & S26	Regulation 6-301	Ringelmann 1.0	BAAQMD Condition # 17281 Part 1	P/W	Pressure drop monitoring
	Regulation 6-310	0.15 grain/dscf @ 6% O2	BAAQMD Condition # 17281 Part 1	P/W	Pressure drop monitoring
	Regulation 6-311	4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	BAAQMD Condition # 17281 Part 1	P/W	Pressure drop monitoring
S3	Regulation 6-301	Ringelmann 1.0	BAAQMD Condition # 16599 Part 3	P/M	Visual Inspection
	Regulation 6-310	0.15 grain/dscf @ 6% O2	BAAQMD Condition # 16599 Part 3	P/M	Visual Inspection
	Regulation 6-311	4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	BAAQMD Condition # 16599 Part 3	P/M	Visual Inspection
S7 & S16	BAAQMD 6-301	Ringelmann No. 1	BAAQMD Permit Condition # 17282 Part 3	P/every 1 million gal combusted	Visible emissions check
	BAAQMD 6-310	0.15 grain/dscf @ 6% O2	BAAQMD Permit Condition # 17282 Part 3	P/every 1 million gal combusted	Visible emissions check

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S7 & S16	Regulation 6-311	4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	BAAQMD Permit Condition # 17282 Part 3	P/every 1 million gal combusted	Visible emissions check
S8	Regulation 6-301	Ringelmann 1.0	BAAQMD Condition # 6130 Part 3	P/W	Pressure drop monitoring
	Regulation 6-310	0.15 grain/dscf @ 6% O2	BAAQMD Condition # 6130 Part 3	P/W	Pressure drop monitoring
	Regulation 6-311	4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	BAAQMD Condition # 6130 Part 3	P/W	Pressure drop monitoring
S12	Regulation 6-301	Ringelmann 1.0	BAAQMD Condition # 6131 Part 3	P/W	Pressure drop monitoring
	Regulation 6-310	0.15 grain/dscf @ 6% O2	BAAQMD Condition # 6131 Part 3	P/W	Pressure drop monitoring
	Regulation 6-311	4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	BAAQMD Condition # 6131 Part 3	P/W	Pressure drop monitoring
S15	Regulation 6-301	Ringelmann 1.0	BAAQMD Condition # 16147 Part 5	P/W	Pressure drop monitoring
	Regulation 6-310	0.15 grain/dscf @ 6% O2	BAAQMD Condition # 16147 Part 5	P/W	Pressure drop monitoring
	Regulation 6-311	4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	BAAQMD Condition # 16147 Part 5	P/W	Pressure drop monitoring
S20	Regulation 6-301	Ringelmann 1.0	BAAQMD Condition # 17283 Part 1	P/M	Visible emissions check
	Regulation 6-310	0.15 grain/dscf @ 6% O2	BAAQMD Condition # 17283 Part 1	P/M	Visible emissions check

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S20	Regulation 6-311	4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	BAAQMD Condition # 17283 Part 1	P/M	Visible emissions check
S22	Regulation 6-301	Ringelmann 1.0	BAAQMD Condition # 15255 Part 4	P/M	Visible emissions check
	Regulation 6-310	0.15 grain/dscf @ 6% O2	BAAQMD Condition # 15255 Part 4	P/M	Visible emissions check
	Regulation 6-311	4.10P ^{0.67} lb/hr, where P is process weight, ton/hr	BAAQMD Condition # 15255 Part 4	P/M	Visible emissions check

PM10

Source #	Emission Limit Citation	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
S10	BAAQMD Condition # 16147 Part 2	Ringelmann 0.5	BAAQMD Condition # 16147 Part 5	P/W	Pressure drop monitoring
S29	BAAQMD Condition # 14247 Part 3	Ringelmann 0.5	BAAQMD Condition # 14247 Part 6	P/M	Visible emissions check

VOC

Source #	Emission Limit Citation	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
S28	Regulation 8-19-302.2	340 g/l (2.8 lb/gal)	Regulation 8-19-501	P/E	Records

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VOC

Source #	Emission Limit Citation	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
S28	BAAQMD Condition #11261 Part 1	2986.6 lb/yr	BAAQMD Condition # 11261 Part 3	P/M	Records
	BAAQMD Condition #11261 Part 2	2.8 lb/gal	Regulation 8-19-501; BAAQMD Condition # 11261 Part 3	P/E	Records

NOX

Source #	Emission Limit Citation	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
S7 & S16	BAAQMD 9-7-301.1	30 ppmv @3%O2, dry	BAAQMD Condition # 17282 Part 1	P/A	Annual source test
	BAAQMD 9-7-305.1	150 ppmv @ 3%O2, dry		N	
	BAAQMD 9-7-306.1	150 ppmv @ 3%O2, dry		N	
	BAAQMD Cond. #13032, Part 1	30 ppmv @ 3%O2, dry	BAAQMD Condition # 17282 Part 1	P/A	Annual source test

CO

Source #	Emission Limit Citation	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
S7 & S16	BAAQMD 9-7-301.2	400 ppmv @3%O2, dry	BAAQMD Condition # 17282 Part 1	P/A	Annual source test
	BAAQMD 9-7-305.2	400 ppmv @3%O2, dry		N	

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CO

Source #	Emission Limit Citation	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
S7 & S16	BAAQMD 9-7-306.2	400 ppmv @ 3% O ₂ , dry		N	

SO₂

Source #	Emission Limit Citation	Emission Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type
S7 & S16	BAAQMD 9-1-301	GLC ¹ of 0.5 ppm for 3 min or 0.25 ppm for 60 min or 0.05 ppm for 24 hours		N	
	BAAQMD 9-1-302	SO ₂ shall not exceed 300 ppm (dry)		N	
	BAAQMD 9-1-304	Sulfur content of fuel <0.5% by weight	BAAQMD Permit Condition # 17282 Part 2	P/E	Fuel certification by vendor

Adequate recordkeeping requirements are in place for the sources at the facility to monitor the criteria pollutant emissions from these sources. However, to ensure adequate capture efficiencies are achieved while operating, additional monitoring is recommended for specific sources as detailed below. [see underlines for additions and strikethrough for deletions]

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]

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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]

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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.

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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)

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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]
1. 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]
2. 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]

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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]

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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]

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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 NOx 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)

Compliance Status:

There are currently no sources out of compliance.

Alignment of Information in Application and Proposed Permit:

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S28 and S29 were added to the Title V permit since the original application, while S1, S11, and S19 have been shutdown and removed from service (and the Title V permit).

Permit Shield:

No permit shield was requested.

Alternate Operating Scenarios

No alternate operating scenarios were requested.