



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

November 10, 2011

Mr. Gerardo C. Rios
Chief, Permits Office
U.S. EPA Region IX AIR 3
75 Hawthorne Street
San Francisco, CA 94105-3901

Dear Mr. Rios:

Subject: Bentley Prince Street, Inc. – I.D. No. 40034, RECLAIM/Title V Permit
Revision

Bentley has proposed to revise their RECLAIM/Title V Permit by the addition of five boilers. This is a carpet manufacturing facility located at 14641 E. Don Julian Rd., City of Industry, CA. The proposed permit revision is considered as a “deminimis significant permit revision” to their Title V Permit. Enclosed for your review are the permit evaluation and proposed permit for the proposed permit revision. With your receipt of the proposed Title V permit revision today, we will note that the EPA 45-day review period will begin on November 10, 2011.

If you have any questions or need additional information regarding the proposed permit revision, please contact Ms. Dixie Richards at (909) 396-2395.

Sincerely,

Brian L. Yeh
Senior Manager
Mechanical, Chemical, Public Services

BLY:DR

Enclosure

FACILITY PERMIT TO OPERATE BENTLEY PRINCE STREET INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 1: CARPET PRODUCTION LINE NO. 1, FINISHING LINE					
System 1: RAW MATERIAL STORAGE AND MIXING					
STORAGE SILO, CALCIUM CARBONATE, 2,800 CUBIC FEET CAPACITY A/N: 406978	D1	D4 D5 D7 C51		PM: (9) [RULE 405, 2-7-1986]	D323.1
STORAGE SILO, ALUMINA TRIHYDRATE OR ANHYDROUS ALUMINUM SILICATE, WITH FABRIC FILTER, HEIGHT: 24 FT ; DIAMETER: 12 FT A/N: 469025	D2			PM: (9) [RULE 404, 2-7-1986; RULE 405, 2-7-1986]	D322.1, D381.1, K67.1
CYCLONE, RECEIVER/FEEDER, DIAMETER: 1 FT 4 IN A/N: 469029	D7	D1 D4 D5			
MIXER, NO. 1, 2244 GALS; DIAMETER: 7 FT ; HEIGHT: 10 FT 6 IN A/N: 469029	D4	D1 D7 C56		PM: (9) [RULE 405, 2-7-1986]	D323.1, E54.1, E54.2
MIXER, NO. 2, 5800 GALS; DIAMETER: 9 FT ; HEIGHT: 12 FT A/N: 469029	D5	D1 D7 C56		PM: (9) [RULE 405, 2-7-1986]	D323.1, E54.1, E54.2
BAGHOUSE, DONALDSON, MODEL 16PJD, WITH PULSE JET CLEANING, 159 SQ.FT. A/N: 406975	C51	D1		PM: (9) [RULE 404, 2-7-1986]	D322.1, D381.1, E102.1, K67.1
DUST COLLECTOR, CARTRIDGE FILTER, CYCLONAIRE, REVERSE PULSE CLEANING, 180 SQ. FT. TOTAL, 60 SQ.FT.; 3 CARTRIDGE A/N: 469027	C52	D53		PM: (9) [RULE 404, 2-7-1986]	D322.1, D381.1, E102.1, K67.1
UNLOADING STATION, CYCLONAIRE, SUPER SACK A/N: 469029	D53	C52		PM: (9) [RULE 405, 2-7-1986]	D323.1, E440.1

* (1) (1A) (1B) Denotes RECLAIM emission factor
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit
 (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit
 (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits
 (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE BENTLEY PRINCE STREET INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 1: CARPET PRODUCTION LINE NO. 1, FINISHING LINE					
CONVEYOR, PNEUMATIC, ALUMINA TRIHYDRATE OR ANHYDROUS ALUMINUM SILICATE, CYCLONAIRE, MODEL HC-30 WITH A/N: 469029 KNOCKOUT BOX	D54				
DUST COLLECTOR, CYCLONAIRE, MODEL 36-DC-9, PULSE JET CLEANING, 198 SQ. FT. TOTAL, 22 SQ.FT.; 9 CARTRIDGE A/N: 469029	C56	D4 D5		PM: (9) [RULE 404, 2-7-1986]	D322.1, D381.1, E102.1, K67.1
System 2: COATING, CURING AND PROCESSING					
TANK, SURGE, NO. 1, ADHESIVE, 1125 GALS A/N: 424208	D8				
TANK, SURGE, NO. 2, ADHESIVE, 1125 GALS A/N: 424208	D9				
COATER, SYSTEM NO. 1 A/N: 424208	D10			ROG: (9) [RULE 1128, 3-8-1996; RULE 1171, 11-7-2003; RULE 1171, 7-14-2006]	C1.1, H23.3

- | | |
|---|---|
| <p>* (1) (1A) (1B) Denotes RECLAIM emission factor
 (3) Denotes RECLAIM concentration limit
 (5) (5A) (5B) Denotes command and control emission limit
 (7) Denotes NSR applicability limit
 (9) See App B for Emission Limits</p> | <p>(2) (2A) (2B) Denotes RECLAIM emission rate
 (4) Denotes BACT emission limit
 (6) Denotes air toxic control rule limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (10) See section J for NESHAP/MACT requirements</p> |
|---|---|

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FACILITY PERMIT TO OPERATE BENTLEY PRINCE STREET INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 1: CARPET PRODUCTION LINE NO. 1, FINISHING LINE					
OVEN, DRYING, SYSTEM NO. 1, NATURAL GAS, WITH LOW NOX BURNER, 21.6 MMBTU/HR WITH A/N: 424208 BURNER, NATURAL GAS, MAXON, MODEL CYCLOMAX, WITH LOW NOX BURNER, 8 TOTAL; 2.7 MMBTU/HR	D11		NOX: LARGE SOURCE**	CO: 2000 PPMV (5) [RULE 407, 4-2-1982]; NOX: 80 PPMV NATURAL GAS (3) [RULE 2012, 5-6-2005]; PM: (9) [RULE 404, 2-7-1986]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]	C1.4, C6.2, D323.1
CARPET SHEARER, SYSTEM NO. 1 A/N: 424208	D12	C13		PM: (9) [RULE 405, 2-7-1986]	D323.1
BAGHOUSE, SELLERS, 2067 SQ.FT.; 56 BAGS A/N: 111054	C13	D12		PM: (9) [RULE 404, 2-7-1986]	D322.1, D381.2, E102.1, K67.1
Process 2: CARPET PRODUCTION LINE NO. 2					
System 1: DYEING AND PROCESSING					
CARPET SHEARER, STATION NO. 1 A/N: 169851	D15	C17		PM: (9) [RULE 405, 2-7-1986]	C1.2, D323.1
CARPET SHEARER, STATION NO. 2 A/N: 169851	D16	C17		PM: (9) [RULE 405, 2-7-1986]	C1.2, D323.1
BAGHOUSE, NO. 1, 1508 SQ.FT.; 48 BAGS A/N: 153071	C17	D15 D16		PM: (9) [RULE 404, 2-7-1986]	D322.1, D381.2, E102.1, K67.1
CARPET SHEARER, STATION NO. 3 A/N: 169851	D18	C20		PM: (9) [RULE 405, 2-7-1986]	C1.2, D323.1
CARPET SHEARER, STATION NO. 4 A/N: 169851	D19	C20		PM: (9) [RULE 405, 2-7-1986]	C1.2, D323.1

- * (1) (1A) (1B) Denotes RECLAIM emission factor (2) (2A) (2B) Denotes RECLAIM emission rate
 (3) Denotes RECLAIM concentration limit (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE BENTLEY PRINCE STREET INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 2: CARPET PRODUCTION LINE NO. 2					
BAGHOUSE, NO. 2, 880 SQ.FT.; 28 BAGS A/N: 169852	C20	D18 D19		PM: (9) [RULE 404, 2-7-1986]	D322.1, D381.2, E102.1, K67.1
OVEN, DRYING, NATURAL GAS, 15 MMBTU/HR WITH A/N: 396244 BURNER, NATURAL GAS, MAXON, MODEL CYCLOMAX, WITH LOW NOX BURNER, 2 TOTAL; 2.7 MMBTU/HR BURNER, NATURAL GAS, MAXON, MODEL CYCLOMAX, WITH LOW NOX BURNER, 6 TOTAL; 1.6 MMBTU/HR	D40		NOX: LARGE SOURCE**	CO: 2000 PPMV NATURAL GAS (5) [RULE 407, 4-2-1982]; NOX: 42 PPMV NATURAL GAS (3) [RULE 2012, 5-6-2005]; PM: (9) [RULE 404, 2-7-1986]; PM: 0.1 GRAINS/SCF NATURAL GAS (5) [RULE 409, 8-7-1981]	C1.1, C6.1, D323.1
Process 3: BOILERS					

* (1) (1A) (1B) Denotes RECLAIM emission factor
 (3) Denotes RECLAIM concentration limit
 (5) (5A) (5B) Denotes command and control emission limit
 (7) Denotes NSR applicability limit
 (9) See App B for Emission Limits
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (4) Denotes BACT emission limit
 (6) Denotes air toxic control rule limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE BENTLEY PRINCE STREET INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions* And Requirements	Conditions
Process 3: BOILERS					
BOILER, NO. 1, NATURAL GAS, PROPANE, BABCOCK & WILCOX, WITH LOW NOX BURNER, FLUE GAS RECIRCULATION, 35.154 MMBTU/HR WITH A/N: 223631 BURNER, THREE, NATURAL GAS, PROPANE, AUS, MODEL AUS-6000 LNB, WITH LOW NOX BURNER, 35.154 MMBTU/HR	D25		NOX: LARGE SOURCE**	CO: 400 PPMV (5) [RULE 1146, 11-17-2000]; CO: 2000 PPMV (5A) [RULE 407, 4-2-1982]; NOX: 37.245 PPMV NATURAL GAS (3) [RULE 2012, 5-6-2005]; NOX: 38.948 PPMV PROPANE (3) [RULE 2012, 5-6-2005]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]	B75.1, D182.1, D328.1, E113.1, K48.1
BOILER, NO. 3, NATURAL GAS, PROPANE, JOHNSTON, MODEL 535-200, WITH LOW NOX BURNER, FLUE GAS RECIRCULATION, 31.5 MMBTU/HR WITH A/N: 223633 BURNER, NATURAL GAS, PROPANE, AUS, MODEL AUS-6000 LNB, WITH LOW NOX BURNER, 31.5 MMBTU/HR	D27		NOX: LARGE SOURCE**	CO: 400 PPMV (5) [RULE 1146, 11-17-2000]; CO: 2000 PPMV (5A) [RULE 407, 4-2-1982]; NOX: 37.245 PPMV NATURAL GAS (3) [RULE 2012, 5-6-2005]; NOX: 38.948 PPMV PROPANE (3) [RULE 2012, 5-6-2005]; PM: 0.1 GRAINS/SCF (5) [RULE 409, 8-7-1981]	B75.1, D182.1, D328.1, E113.1, K48.1
BOILER, NATURAL GAS, SELLERS ENGINEERING CO., MODEL TP50-S, 2 MMBTU/HR A/N:	D57		NOX: PROCESS UNIT**	NOX: 20 PPMV NATURAL GAS (3) [RULE 2012, 5-6-2005]	D28.1

* (1) (1A) (1B) Denotes RECLAIM emission factor
 (3) Denotes RECLAIM concentration limit
 (5) (5A) (5B) Denotes command and control emission limit
 (7) Denotes NSR applicability limit
 (9) See App B for Emission Limits
 (2) (2A) (2B) Denotes RECLAIM emission rate
 (4) Denotes BACT emission limit
 (6) Denotes air toxic control rule limit
 (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (10) See section J for NESHAP/MACT requirements
 ** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE BENTLEY PRINCE STREET INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 3: BOILERS					
BOILER, NATURAL GAS, SELLERS ENGINEERING CO., MODEL TP50-S, 2 MMBTU/HR A/N:	D58		NOX: PROCESS UNIT**	NOX: 20 PPMV NATURAL GAS (3) [RULE 2012, 5-6-2005]	D28.1
BOILER, NATURAL GAS, SELLERS ENGINEERING CO., MODEL TP50-S, 2 MMBTU/HR A/N:	D59		NOX: PROCESS UNIT**	NOX: 20 PPMV NATURAL GAS (3) [RULE 2012, 5-6-2005]	D28.1
BOILER, NATURAL GAS, SELLERS ENGINEERING CO., MODEL TP50-S, 2 MMBTU/HR A/N:	D60		NOX: PROCESS UNIT**	NOX: 20 PPMV NATURAL GAS (3) [RULE 2012, 5-6-2005]	D28.1
BOILER, NATURAL GAS, SELLERS ENGINEERING CO., MODEL TP50-S, 2 MMBTU/HR A/N:	D61		NOX: PROCESS UNIT**	NOX: 20 PPMV NATURAL GAS (3) [RULE 2012, 5-6-2005]	D28.1
Process 4: INTERNAL COMBUSTION ENGINES					
INTERNAL COMBUSTION ENGINE, EMERGENCY FIRE, DIESEL FUEL, CUMMINS, MODEL NH-2201F, 220 HP A/N: 204162	D28		NOX: PROCESS UNIT**	NOX: 469 LBS/1000 GAL DIESEL (1) [RULE 2012, 5-6-2005]; PM: (9) [RULE 404, 2-7-1986]	C1.5, D12.1, K67.3
Process 5: Rule 219 Exempt Equipment Subject to Source-Specific Requirement					
RULE 219 EXEMPT EQUIPMENT, CLEANING EQUIPMENT, SMALL, UNHEATED, NON-CONVEYORIZED	E43			ROG: (9) [RULE 1171, 11-7-2003; RULE 1171, 2-1-2008]	H23.1
RULE 219 EXEMPT EQUIPMENT, REFRIGERATION UNITS	E44				H23.2
RULE 219 EXEMPT EQUIPMENT, COATING EQUIPMENT, PORTABLE, ARCHITECTURAL COATINGS	E45			ROG: (9) [RULE 1113, 11-8-1996; RULE 1113, 7-13-2007; RULE 1171, 11-7-2003; RULE 1171, 2-1-2008]	K67.2

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 (3) Denotes RECLAIM concentration limit (4) Denotes BACT emission limit
 (5) (5A) (5B) Denotes command and control emission limit (6) Denotes air toxic control rule limit
 (7) Denotes NSR applicability limit (8) (8A) (8B) Denotes 40 CFR limit (e.g. NSPS, NESHAPS, etc.)
 (9) See App B for Emission Limits (10) See section J for NESHAP/MACT requirements

** Refer to section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

**FACILITY PERMIT TO OPERATE
BENTLEY PRINCE STREET INC**

SECTION D: DEVICE ID INDEX

**The following sub-section provides an index
to the devices that make up the facility
description sorted by device ID.**

**FACILITY PERMIT TO OPERATE
 BENTLEY PRINCE STREET INC
 SECTION D: DEVICE ID INDEX**

Device Index For Section D			
Device ID	Section D Page No.	Process	System
D1	1	1	1
D2	1	1	1
D4	1	1	1
D5	1	1	1
D7	1	1	1
D8	2	1	2
D9	2	1	2
D10	2	1	2
D11	3	1	2
D12	3	1	2
C13	3	1	2
D15	3	2	1
D16	3	2	1
C17	3	2	1
D18	3	2	1
D19	3	2	1
C20	4	2	1
D25	5	3	0
D27	5	3	0
D28	6	4	0
D40	4	2	1
E43	6	5	0
E44	6	5	0
E45	6	5	0
C51	1	1	1
C52	1	1	1
D53	1	1	1
D54	2	1	1
C56	2	1	1
D57	5	3	0
D58	6	3	0
D59	6	3	0
D60	6	3	0
D61	6	3	0

FACILITY PERMIT TO OPERATE BENTLEY PRINCE STREET INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

FACILITY CONDITIONS

F9.1 Except for open abrasive blasting operations, the operator shall not discharge into the atmosphere from any single source of emissions whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is:

(a) As dark or darker in shade as that designated No.1 on the Ringelmann Chart, as published by the United States Bureau of Mines; or

(b) Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subparagraph (a) of this condition.

[RULE 401, 3-2-1984; RULE 401, 11-9-2001]

F14.1 The operator shall not use diesel fuel containing sulfur compounds in excess of 0.05 percent by weight.

[RULE 431.2, 5-4-1990; RULE 431.2, 9-15-2000]

F14.2 The operator shall not use diesel fuel containing sulfur compounds in excess of 15 ppm by weight as supplied by the supplier.

[RULE 431.2, 9-15-2000]

FACILITY PERMIT TO OPERATE BENTLEY PRINCE STREET INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

F24.1 Accidental release prevention requirements of Section 112(r)(7):

a). The operator shall comply with the accidental release prevention requirements pursuant to 40 CFR Part 68 and shall submit to the Executive Officer, as a part of an annual compliance certification, a statement that certifies compliance with all of the requirements of 40 CFR Part 68, including the registration and submission of a risk management plan (RMP).

b). The operator shall submit any additional relevant information requested by the Executive Officer or designated agency.

[40CFR 68 - Accidental Release Prevention, 5-24-1996]

DEVICE CONDITIONS

B. Material/Fuel Type Limits

B75.1 The operator shall not use LPG in this equipment except under the following circumstance(s):

Natural gas curtailment

Maintenance testing

Compliance testing

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition : D25, D27]

C. Throughput or Operating Parameter Limits

FACILITY PERMIT TO OPERATE BENTLEY PRINCE STREET INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

C1.1 The operator shall limit the material processed to no more than 70 feet per minute.

For the purpose of this condition, material processed shall be defined as carpet in this system.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D10, D40]

C1.2 The operator shall limit the material processed to no more than 280000 lbs in any one day.

For the purpose of this condition, material processed shall be defined as carpet in this system.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D15, D16, D18, D19]

C1.4 The operator shall limit the natural gas fuel usage to no more than 1.17669e+07 cubic feet per month.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D11]

C1.5 The operator shall limit the operating time to no more than 199 hour(s) in any one year.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 1304(a)-Modeling and Offset Exemption, 6-14-1996; RULE 2012, 5-6-2005]

FACILITY PERMIT TO OPERATE BENTLEY PRINCE STREET INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

[Devices subject to this condition : D28]

- C6.1 The operator shall use this equipment in such a manner that the temperature being monitored, as indicated below, does not exceed 375 Deg F.

To comply with this condition, the operator shall install and maintain a(n) temperature gauge to accurately indicate the temperature in the oven.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002; RULE 401, 3-2-1984; RULE 401, 11-9-2001]

[Devices subject to this condition : D40]

- C6.2 The operator shall use this equipment in such a manner that the temperature being monitored, as indicated below, does not exceed 450 Deg F.

To comply with this condition, the operator shall install and maintain a(n) temperature gauge to accurately indicate the temperature in the oven.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002; RULE 401, 3-2-1984; RULE 401, 11-9-2001]

[Devices subject to this condition : D11]

D. Monitoring/Testing Requirements

- D12.1 The operator shall install and maintain a(n) non-resettable elapsed time meter to accurately indicate the elapsed operating time of the engine.

[RULE 2012, 5-6-2005]

[Devices subject to this condition : D28]

FACILITY PERMIT TO OPERATE BENTLEY PRINCE STREET INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

D28.1 The operator shall conduct source test(s) in accordance with the following specifications:

The test shall be conducted to determine the NOX emissions at the outlet.

The test shall be conducted every five-year period, with the first five-year period ending December 31, 2004.

The test shall be conducted within 12 months of the approval of the concentration limit.

[RULE 2012, 5-6-2005]

[Devices subject to this condition : D57, D58, D59, D60, D61]

D182.1 The operator shall test this equipment in accordance with the following specifications:

During the adjustments and tune-up of the control system, NOx and CO emissions data shall be determined and measured by a portable analyzer.

[RULE 1146, 11-17-2000; RULE 2012, 5-6-2005]

[Devices subject to this condition : D25, D27]

D322.1 The operator shall perform annual inspection of the equipment and filter media for leaks, broken or torn filter media, and improperly installed filter media.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : D2, C13, C17, C20, C51, C52, C56]

FACILITY PERMIT TO OPERATE BENTLEY PRINCE STREET INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

D323.1 The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on an annual basis, at least, unless the equipment did not operate during the entire annual period. The routine annual inspection shall be conducted while the equipment is in operation and during daylight hours.

If any visible emissions (not including condensed water vapor) are detected that last more than three minutes in any one hour, the operator shall verify and certify within 24 hours that the equipment causing the emission and any associated air pollution control equipment are operating normally according to their design and standard procedures and under the same conditions under which compliance was achieved in the past, and either:

- 1). Take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit; or
- 2). Have a CARB-certified smoke reader determine compliance with the opacity standard, using EPA Method 9 or the procedures in the CARB manual "Visible Emission Evaluation", within three business days and report any deviations to AQMD.

The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

- 1). Stack or emission point identification;
- 2). Description of any corrective actions taken to abate visible emissions;
- 3). Date and time visible emission was abated; and
- 4). All visible emission observation records by operator or a certified smoke reader.

FACILITY PERMIT TO OPERATE BENTLEY PRINCE STREET INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : D1, D4, D5, D11, D12, D15, D16, D18, D19, D40, D53]

D328.1 The operator shall determine compliance with the CO emission limit(s) either: (a) conducting a source test at least once every five years using AQMD Method 100.1 or 10.1; or (b) conducting a test at least annually using a portable analyzer and AQMD-approved test method. The test shall be conducted when the equipment is operating under normal conditions to demonstrate compliance with Rule 1146 concentration limit. The operator shall comply with all general testing, reporting, and recordkeeping requirements in Sections E and K of this permit.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : D25, D27]

FACILITY PERMIT TO OPERATE BENTLEY PRINCE STREET INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

D381.1 The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on an annual basis, at least, unless the equipment did not operate during the entire annual period. The routine annual inspection shall be conducted while the equipment is in operation and during daylight hours. If any visible emissions (not including condensed water vapor) are detected, the operator shall take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit.

The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

- 1). Stack or emission point identification;
- 2). Description of any corrective actions taken to abate visible emissions; and
- 3). Date and time visible emission was abated.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : D2, C51, C52, C56]

FACILITY PERMIT TO OPERATE BENTLEY PRINCE STREET INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

D381.2 The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on a quarterly basis, at least, unless the equipment did not operate during the entire quarterly period. The routine quarterly inspection shall be conducted while the equipment is in operation and during daylight hours. If any visible emissions (not including condensed water vapor) are detected, the operator shall take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit.

The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

- 1). Stack or emission point identification;
- 2). Description of any corrective actions taken to abate visible emissions; and
- 3). Date and time visible emission was abated.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : C13, C17, C20]

E. Equipment Operation/Construction Requirements

E54.1 The operator is not required to vent this equipment to the following equipment if all of the requirements listed below are met:

Device ID: D1 [Silo]

Requirement number 1: mixer is vented to dust collector C56

FACILITY PERMIT TO OPERATE BENTLEY PRINCE STREET INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 401, 3-2-1984; RULE 401, 11-9-2001]

[Devices subject to this condition : D4, D5]

E54.2 The operator is not required to vent this equipment to the following equipment if all of the requirements listed below are met:

Device ID: C56 [Dust Collector]

Requirement number 1: mixer is vented to silo D1

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 401, 3-2-1984; RULE 401, 11-9-2001]

[Devices subject to this condition : D4, D5]

E102.1 The operator shall discharge dust collected in this equipment only into closed containers.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE 401, 3-2-1984; RULE 401, 11-9-2001]

[Devices subject to this condition : C13, C17, C20, C51, C52, C56]

E113.1 The operator shall have the burner equipped with a control system to automatically regulate the combustion air, fuel and, if applicable, recirculated flue gas as the boiler load varies. This control system shall be adjusted and tuned at least twice a year according to the manufacturer's specifications to maintain its ability to repeat the same performance at the same firing rate.

[RULE 1146, 11-17-2000; RULE 2012, 5-6-2005]

FACILITY PERMIT TO OPERATE BENTLEY PRINCE STREET INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

[Devices subject to this condition : D25, D27]

E440.1 The operator shall operate and maintain this equipment according to the following specifications:

The dust collector fan shall be turned on whenever the doors are open
 The doors shall be kept closed except when changing bags

[RULE 1303(a)-BACT, 5-10-1996; RULE 401, 3-2-1984; RULE 401, 11-9-2001]

[Devices subject to this condition : D53]

H. Applicable Rules

H23.1 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
ROG	District Rule	1122

[RULE 1122, 10-1-2004]

[Devices subject to this condition : E43]

H23.2 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
Refrigerants	District Rule	1415

FACILITY PERMIT TO OPERATE BENTLEY PRINCE STREET INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

[RULE 1415, 10-14-1994]

[Devices subject to this condition : E44]

H23.3 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	109

[RULE 109, 5-2-2003]

[Devices subject to this condition : D10]

K. Record Keeping/Reporting

K48.1 The operator shall maintain records in a manner approved by the District, to demonstrate compliance with the following condition number(s):

Condition Number E 113- 1

Condition Number D 182- 1

[RULE 1146, 11-17-2000; RULE 2012, 5-6-2005]

[Devices subject to this condition : D25, D27]

K67.1 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

FACILITY PERMIT TO OPERATE BENTLEY PRINCE STREET INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

The name of the person performing the inspection and/or maintenance of the filter.

The date , time and results of the inspection.

The date, time and description of any maintenance or repairs resulting from the inspection.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : D2, C13, C17, C20, C51, C52, C56]

K67.2 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

For architectural applications where no thinners, reducers, or other VOC containing materials are added, maintain semi-annual records for all coating consisting of (a) coating type, (b) VOC content as supplied in grams per liter (g/l) of materials for low-solids coatings, (c) VOC content as supplied in g/l of coating, less water and exempt solvent, for other coatings.

For architectural applications where thinners, reducers, or other VOC containing materials are added, maintain daily records for each coating consisting of (a) coating type, (b) VOC content as applied in grams per liter (g/l) of materials used for low-solids coatings, (c) VOC content as applied in g/l of coating, less water and exempt solvent, for other coatings.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : E45]

K67.3 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

The engine operating log listing the date of operation, the elapsed time in hours and the reason for operation.

**FACILITY PERMIT TO OPERATE
BENTLEY PRINCE STREET INC**

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

**[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; RULE
1304(a)-Modeling and Offset Exemption, 6-14-1996; RULE 2012, 5-6-2005]**

[Devices subject to this condition : D28]

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Bentley

EQUIPMENT DESCRIPTION

APPLICATION NOS. 528999, 529000, 529001, 529002, 529003

5 BOILERS, D57, D58, D59, D60, D61, SELLERS ENGINEERING CO., MODEL TP50-S, EACH 2 MMBTU/HR, NATURAL GAS FIRED

APPLICATION NO. TBD

RECLAIM/TITLE V MODIFICATION

BACKGROUND/DISCUSSION

Existing boilers which are exempt from permit per R219. Company does not want to use the RECLAIM default emission factor as required for unpermitted equipment. The above applications were filed to permit the boilers and add them to the facility permit to be able to report emissions using the lower R1146.2 NOx emission limits that the boilers are certified to meet.

PROCESS DESCRIPTION

This facility is in the business of manufacturing carpet.

EMISSION ESTIMATES

See attached calculation sheet

Boilers are certified to meet 20 ppm NOx @3 % O2

RULE COMPLIANCE

Rule 212 Standards for approving permits

212(c)(1) Using the website Great Schools, the closest schools, Puente Hills High School, Nelson Elementary School, and Valley Community Day School, are 0.8mile (4224 feet) from Bentley. A public notice is not required under this paragraph.

212(c)(2) All pollutant emissions are less than the threshold. A public notice is not required under this paragraph.

212(c)(3) Risk does not exceed R1401 threshold. A public notice is not required under this paragraph.

Rule 401 – Visible Emissions

Compliance is expected.

SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT <i>ENGINEERING DIVISION</i> APPLICATION PROCESSING AND CALCULATIONS	PAGES 2	PAGE 2
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Rule 402- Nuisance
Compliance is expected.

Rules 404, 405 – PM concentration & weight
Compliance is expected.

Rule 1146.2 – Water heaters, boilers and process heaters ≤ 2 mmbtu/hr
This is a RECLAIM facility exempt from the NOX provisions in this rule, but subject to the CO requirements. Equipment is certified to meet R1146.2. Compliance is expected.

New Source Review
Equipment is R219 exempt, therefore NSR does not apply. 30 day average emissions will be entered into the database as 0.

Rule 1401 – Toxics
See attached risk assessment report. Passes Tier II screening

Reg XX – RECLAIM
RECLAIM requires emissions from unpermitted equipment to be reported using the default emission factor (130 #NOx/mmcf). These boilers will be permitted as process units with a concentration limit of 20 ppm. Source testing is required within the first year, and every five years.

Reg XXX – Title V
De minimis permit revision. 45 day EPA review is required.

RECOMMENDATION

Compliance with all applicable rules and regulations is expected. Permits to operate are recommended after EPA review.

BOILER DATA

Max burner rating	2,000,000	BTU/hr
Fuel HHV	1050	btu/ft3
Fuel rate	1,905	ft3/hr
MM of fuel rate	0.001905	mmcf/hr
VOC control (Rule 1401)		percent eff

Compound	EF (lb/mmcf)	R1 (lb/hr)	R2 (lb/hr)	NSR Data Entry (E-06 lb/hr)	
				R1	R2
Acetaldehyde	4.30E-03	8.1905E-06	8.1905E-06	8.1905	8.1905
Acrolein	2.70E-03	5.1429E-06	5.1429E-06	5.1429	5.1429
Benzene (including benzene from gasoline)	8.00E-03	1.5238E-05	1.5238E-05	15.2381	15.2381
Ethyl benzene	9.50E-03	1.8095E-05	1.8095E-05	18.0952	18.0952
Formaldehyde	1.70E-02	3.2381E-05	3.2381E-05	32.3810	32.3810
Hexane (n-)	6.30E-03	1.20000E-05	1.20000E-05	12.0000	12.0000
Naphthalene	3.00E-04	5.7143E-07	5.7143E-07	0.5714	0.5714
PolyCyclic Aromatic	1.00E-04	1.9048E-07	1.9048E-07	0.1905	0.1905
Propylene	7.31E-01	0.00139238	0.00139238	1392.3810	1392.3810
Toluene (methyl benzene)	3.66E-02	6.9714E-05	6.9714E-05	69.7143	69.7143
Xylenes (isomers and mixtures)	2.72E-02	5.18095E-05	5.181E-05	51.8095	51.8095

TIER 2 SCREENING RISK ASSESSMENT REPORT

A/N:

40034

 Fac:

Bentley

Application deemed complete date:

11/02/11

2. Tier 2 Data

MET Factor	1.28
4 hr	0.94
6 or 7 hrs	0.78

Dispersion Factors tables

3	For Chronic X/Q
6	For Acute X/Q

Dilution Factors (ug/m3)/(tons/yr)

Receptor	X/Q	X/Qmax
Residential	8.965993982	79.0305391
Commercial	8.965993982	79.0305391

Adjustment and Intake Factors

	AFann	DBR	EVF
Residential	1	302	0.96
Worker	1	149	0.38

A/N: 40034

Application deemed complete date: 11/02/11

TIER 2 RESULTS

5a. MICR

MICR = CP (mg/(kg-day))⁻¹ * Q (ton/yr) * (X/Q) * AFann * MET * DBR * EVF * 1E-6* MP

Compound	Residential	Commercial
Acetaldehyde	1.19E-09	2.32E-10
Acrolein		
Benzene (including benzene from gasoline)	2.21E-08	4.33E-09
Ethyl benzene	2.29E-09	4.47E-10
Formaldehyde	9.88E-09	1.93E-09
Hexane (n-)		
Naphthalene	9.97E-10	1.95E-10
PolyCyclic Aromatic Hydrocarbon (PAHs)	3.21E-07	3.08E-08
Propylene		
Toluene (methyl benzene)		
Xylenes (isomers and mixtures)		
Total	3.58E-07	3.80E-08
	PASS	PASS

No Cancer Burden, MICR<1.0E-6

5b. Cancer Burden	NO
X/Q for one-in-a-million:	
Distance (meter)	
Area (km2):	
Population:	
Cancer Burden:	

6. Hazard Index

HIA = [Q(lb/hr) * (X/Q)max] * AF / Acute REL

HIC = [Q(ton/yr) * (X/Q) * MET * MP] / Chronic REL

Target Organs	Acute	Chronic	Acute Pass/Fail	Chronic Pass/Fail
Alimentary system (liver) - AL		4.54E-07	Pass	Pass
Bones and teeth - BN			Pass	Pass
Cardiovascular system - CV			Pass	Pass
Developmental - DEV	1.08E-06	2.48E-05	Pass	Pass
Endocrine system - END		4.54E-07	Pass	Pass
Eye	2.11E-04		Pass	Pass
Hematopoietic system - HEM	9.26E-07	1.27E-05	Pass	Pass
Immune system - IMM	9.26E-07		Pass	Pass
Kidney - KID		4.54E-07	Pass	Pass
Nervous system - NS	1.49E-07	2.82E-05	Pass	Pass
Reproductive system - REP	1.08E-06		Pass	Pass
Respiratory system - RES	1.64E-04	9.62E-04	Pass	Pass
Skin			Pass	Pass

A/N: 40034

Application deemed complete date:

11/02/11

6a. Hazard Index Acute

$$HIA = [Q(\text{lb/hr}) * (X/Q)_{\text{max}}] * AF / \text{Acute REL}$$

Compound	HIA - Residential									
	AL	CV	DEV	EYE	HEM	IMM	NS	REP	RESP	SKIN
Acetaldehyde				1.38E-06					1.38E-06	
Acrolein				1.63E-04					1.63E-04	
Benzene (including benzene from gasoline)			9.26E-07		9.26E-07	9.26E-07		9.26E-07		
Ethyl benzene										
Formaldehyde				4.65E-05						
Hexane (n-)										
Naphthalene										
PolyCyclic Aromatic Hydrocarbon (PAHs)										
Propylene										
Toluene (methyl benzene)			1.49E-07	1.49E-07			1.49E-07	1.49E-07	1.49E-07	
Xylenes (isomers and mixtures)				1.86E-07					1.86E-07	
Total			1.08E-06	2.11E-04	9.26E-07	9.26E-07	1.49E-07	1.08E-06	1.64E-04	

Compound	HIA - Commercial									
	AL	CV	DEV	EYE	HEM	IMM	NS	REP	RESP	SKIN
Acetaldehyde				1.38E-06					1.38E-06	
Acrolein				1.63E-04					1.63E-04	
Benzene (including benzene from gasoline)			9.26E-07		9.26E-07	9.26E-07		9.26E-07		
Ethyl benzene										
Formaldehyde				4.65E-05						
Hexane (n-)										
Naphthalene										
PolyCyclic Aromatic Hydrocarbon (PAHs)										
Propylene										
Toluene (methyl benzene)			1.49E-07	1.49E-07			1.49E-07	1.49E-07	1.49E-07	
Xylenes (isomers and mixtures)				1.86E-07					1.86E-07	
Total			1.08E-06	2.11E-04	9.26E-07	9.26E-07	1.49E-07	1.08E-06	1.64E-04	

6b. Hazard Index Chronic

$$HIC = [Q(\text{ton/yr}) * (X/Q) * MET * MP] / \text{Chronic REL}$$

Compound	HIC - Residential												
	AL	BN	CV	DEV	END	EYE	HEM	IMM	KID	NS	REP	RESP	SKIN
Acetaldehyde												2.93E-06	
Acrolein												7.37E-04	
Benzene (including benzene from gasoline)				1.27E-05			1.27E-05			1.27E-05			
Ethyl benzene	4.54E-07			4.54E-07	4.54E-07				4.54E-07				
Formaldehyde													1.80E-04
Hexane (n-)										8.59E-08			
Naphthalene													3.18E-06
PolyCyclic Aromatic Hydrocarbon (PAHs)													
Propylene													2.33E-05
Toluene (methyl benzene)				1.16E-05						1.16E-05			1.16E-05
Xylenes (isomers and mixtures)										3.71E-06			3.71E-06
Total	4.54E-07			2.48E-05	4.54E-07		1.27E-05		4.54E-07	2.82E-05		9.62E-04	

6b. Hazard Index Chronic (cont.)

A/N: 40034

Application deemed complete date:

11/02/11

Compound	HIC - Commercial												
	AL	BN	CV	DEV	END	EYE	HEM	IMM	KID	NS	REP	RESP	SKIN
Acetaldehyde												2.93E-06	
Acrolein												7.37E-04	
Benzene (including benzene from gasoline)				1.27E-05			1.27E-05			1.27E-05			
Ethyl benzene	4.54E-07			4.54E-07	4.54E-07				4.54E-07				
Formaldehyde												1.80E-04	
Hexane (n-)										8.59E-08			
Naphthalene												3.18E-06	
PolyCyclic Aromatic Hydrocarbon (PAHs)													
Propylene												2.33E-05	
Toluene (methyl benzene)				1.16E-05						1.16E-05		1.16E-05	
Xylenes (isomers and mixtures)										3.71E-06		3.71E-06	
Total	4.54E-07			2.48E-05	4.54E-07		1.27E-05		4.54E-07	2.82E-05		9.62E-04	