

**MONTEREY BAY UNIFIED AIR POLLUTION CONTROL DISTRICT
TITLE V OPERATING PERMIT TV42-01**

EVALUATION REPORT

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

APPLICATION RECEIVED FROM:

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

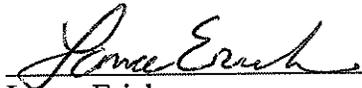
PLANT SITE LOCATION:

8770 Highway 25
Hollister, California

APPLICATION PROCESSED BY:

Mike Sewell, Air Quality Engineer

APPROVED FOR RELEASE BY:



Lance Ericksen
Engineering Division Manager

Date

4/30/07

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Dated: April 26, 2007

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APPLICATION PROCESSED BY:

Mike Sewell, Air Quality Engineer

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

SIC Code: 2879 - Pesticides and Agricultural Chemicals

RESPONSIBLE OFFICIAL:

Name: Mr. Asgeir Berge
Title: Controller
Phone: (831) 637-0195

FACILITY CONTACT PERSON:

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

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FACILITY DESCRIPTION

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

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

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

EQUIPMENT DESCRIPTION

FUMIGANT STORAGE, FORMULATION AND PACKAGING FACILITY CONSISTING OF:

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

APPLICABLE FEDERAL REQUIREMENTS

Rule 200 - Permits Required
Rule 201 - Sources Not Requiring Permits
Rule 207 - Review of New or Modified Sources
Rule 214 - Breakdown Condition

Rule 218 - Title V: Federal Operating Permits
Rule 308 - Title V: Federal Operating Permit Fees
Rule 400 - Visible Emissions
Rule 403 - Particulate Matter
Rule 416 - Solvents
Rule 426 - Architectural Coatings
Rule 429 - Applications of Nonarchitectural Coatings
Rule 433 - Organic Solvent Cleaning
Rule 434 - Coating of Metal Parts and Products
40 CFR Part 61, Subpart M - National Emission Standard for Asbestos
40 CFR Part 68 - Risk Management Planning: Accidental Release Prevention (Section 112r)
40 CFR Part 82 - Protection of Stratospheric Ozone

COMPLIANCE DETERMINATION FOR APPLICABLE FEDERAL REQUIREMENTS

Rule 200 - Permits Required

This facility has historically complied with the requirements of this rule and continued compliance is expected.

Rule 201 - Sources Not Requiring Permits

This rule identifies which equipment is exempt from District permitting requirements.

Rule 207 - Review of New or Modified Sources

This facility did not trigger the NSR process during the issuance of their local permits. The application was dated April 19, 1978 which established the BACT trigger level at a net emission increase of 200 lbs/day. Even though the facility did not trigger NSR, the District determined that the fumigant packaging operation as proposed was BACT. The Rule 207 requirements did not establish any emissions limits for the facility.

Since 1978, the facility has incorporated modifications that have reduced emissions. None of these modifications triggered NSR. Therefore no federally enforceable permit limits have been established by Rule 207 which would be required to be included on the Title V permit.

214 Breakdown Conditions

This is the implementing regulation in which the District has established the criteria for reporting breakdowns. The requirements imposed by this rule will be included on this permit.

Rule 218 - Title V: Federal Operating Permits

This is the implementing regulation by which the District issues the federal Operating Permits. All requirements imposed by this rule will be included in the Title V permit.

Rule 308 - Title V: Federal Operating Permit Fees

This is the District's fee rule for Title V. Appropriate conditions will be included on the Title V permit to ensure compliance with the fee provisions contained in this rule.

Rule 400 - Visible Emissions

This rule is applicable to the emissions from the facility. No visible emissions are expected from facility operations because: 1) the fumigants formulated, packaged, and sampled in the laboratory are colorless, 2) the shot blasting of the cylinders has an integral baghouse to eliminate particulate emissions, and 3) the paint spraying operation is conducted in a paint booth with particulate filters.

An appropriate condition will be included on the permit to ensure compliance with this rule, but no specific testing will be required to verify compliance with this opacity requirement.

Rule 403 - Particulate Matter

The 0.15 grains per dry cubic foot emission standard is applicable to the shot blaster and the paint spraying operation at this facility and will be included on the permit.

Shot Blaster - Based upon the fact that this equipment is a closed system vented to a baghouse with an exhaust rate of 1,100 CFM, the shot blaster would be allowed emissions of 1.4 Lbs PM/hour under this rule $[(0.15 \text{ grains/dscf})(1100 \text{ cfm})(1 \text{ lb}/7000 \text{ grains})(60 \text{ min}/\text{hour}) = 1.4 \text{ lbs PM}/\text{hour}]$. Assuming a 99% efficiency for the bag house, this would equate to a particulate generation of 140 lbs PM/hour within the shot blaster $[(1.4 \text{ lbs PM}/\text{hr})/(1-0.99)] = 140 \text{ lbs PM}/\text{hour}]$. Based upon the fact that it takes 4 minutes to blast each cylinder, the maximum number of cylinders which could be blasted in one hour would be 15; to exceed the 140 lbs PM/hour generation in the shot blaster would require that the blasting of each cylinder generate 9.3 lbs of PM. It would be impossible to generate 9.3 lbs of PM from blasting a cylinder as each cylinder is coated with less than a quart of paint which would equate to at most 3 lbs and assuming the consumption of less than 1 lb of steel shot per hour of operation $[(3 \text{ lbs}/\text{cylinder})(15 \text{ cylinders})+(1 \text{ lb steel shot consumed}/\text{hr})(1 \text{ hr}/60 \text{ min})(4 \text{ min}/\text{cylinder}) = 3.1 \text{ lbs}/\text{cylinder}]$ Therefore, no testing for grain loading from the shot blaster will be required as compliance is assured from the above calculation.

Paint Spray Operation - Based upon the fact that this booth has an exhaust rate of 3,625 CFM, the paint booth would be allowed emissions of 4.7 Lbs PM/hour under this rule $[(0.15 \text{ grains/dscf})(3625 \text{ cfm})(1 \text{ lb}/7000 \text{ grains})(60 \text{ min}/\text{hour}) = 4.7 \text{ lbs PM}/\text{hour}]$. Assuming a 25% transfer efficiency for painting the cylinders and a 90% efficiency for the spray booth filters, this would equate to spraying 62.7 lbs PM/hour sprayed in the booth $[(4.7 \text{ lbs PM}/\text{hr})/(1-0.90)(1-0.25)] = 62.7 \text{ lbs PM}/\text{hour}]$. Assume the use of a 10 lbs/gallon coating with 7.5 lbs solids/gallon would require that 8.4 gallons of coating be sprayed in one hour to exceed the particulate matter limit from this rule. It is impossible for this cylinder painting operation to spray 8.4 gallons of paint in one hour. Therefore, no testing for grain loading from the paint booth will be required as compliance is assured from the above calculation.

Rule 416 - Solvents

This rule has specific emission limits and record keeping requirements for volatile organic compound emissions. This rule applies to the paint spray operation at this facility. Historically,

daily material usage records show that the facility has been operating below the 40 pound per day limit.

This rule does not apply to the fumigant filling operations as fumigants are not defined as Solvents. Section 2.2 of the Rule defines Solvents as dissolvers, viscosity reducers or cleaning agents.

Appropriate conditions will be included on the permit to ensure compliance with the provisions of this rule.

Rule 417 - Storage of Organic Liquids

This rule requires vapor loss control devices on stationary organic storage tanks with a capacity of greater than 39,360 gallons if the organic liquid stored has a true vapor pressure of 1.5 psi at actual storage conditions. Of the three compounds stored (methyl bromide, chloropicrin, and telone), only methyl bromide has a vapor pressure greater than 1.5 psi at actual storage conditions.

Each of the methyl bromide storage tanks presently at the facility have a nominal capacity of 10,000 gallons, therefore this rule is not applicable to this facility.

The facility has three 35,000 gallon telone storage tanks. These three tanks are exempt from the requirements of this rule based upon the tank capacity and the vapor pressure of the product stored.

Rule 426 - Applications of Architectural Coatings

This rule is applicable to all applications of architectural coatings and limits the VOC content of these coatings.

An appropriate condition will be included on the permit to ensure compliance with the requirements of this rule.

Rule 429 - Applications of Nonarchitectural Coatings

This rule contains requirements on the application of nonarchitectural coatings, specifically that all coating operations be done in a complying enclosure unless specific rule criteria is met. During the permit issuance process for this equipment, it was determined that the enclosure met the rule requirements.

Therefore, the facility is in compliance with the requirements of this rule and no specific requirements will be included on the Title V permit.

Rule 433 - Organic Solvent Cleaning

This rule contains specific operational and record keeping requirements for solvent cleaning and degreasing operations.

Appropriate conditions will be included on the permit to ensure compliance with the provisions of this rule.

Rule 434 - Coating of Metal Parts and Products

This rule has a 3.5 lb/gallon VOC content limit for coatings applied to metal parts and products when applying greater than 55 gallons per year to metal parts and products, and exempts a source complying with the requirements of this rule from the requirements of Rule 416 (Organic Solvents). Historical operations at the facility have been in compliance with the requirements of this rule, continued compliance is expected.

Appropriate conditions will be included on the permit to ensure compliance with the provisions of this rule.

40 CFR Part 61, Subpart M - National Emission Standard for Asbestos

This facility on an as needed basis is subject to Section 61.145 through 61.147 - standards for the demolition and renovation of asbestos. Historically, the facility has been in compliance with the requirements of these standards. An appropriate condition will be included on the permit to ensure compliance with these requirement.

40 CFR Part 64 Compliance Assurance Monitoring (CAM)

Tank filling operations for telone mixtures are vented to a carbon adsorption system, which is a *control device* as defined in this part. However this *emissions unit* does not have the potential to emit (PTE) greater than the major source threshold, and therefore is not subject to CAM requirements.

This is based upon the fact that the *emission unit* would need to undergo process modifications to package greater than 500,000 gallons per year of telone (Historically, the maximum quantity of telone packaged at the facility in any given year was less than 90,000 gallons). Utilizing the ideal gas law ($pV=mRT$) to determine that quantity of telone remaining in an empty cylinder and a maximum packaging rate of 500,000 gallons per year, PTE is calculated at 9.8 tons. The calculation is shown below:

Assumptions used for Cylinder Filling Calculations -

- Cylinder holds 28 gallons when full
- Cylinder volume is 3.83 ft³
- Telone molecular weight is 110.98
- Cylinder returned at atmospheric pressure (14.7 psi)
- Cylinder returned with no liquid
- Cylinder contents 100% telone
- Temperature is 68° F

Want to determine the mass of the gas contained in the empty cylinder upon return for refilling. This gas will be displaced by liquid upon filling and will be routed to the carbon adsorption system. Calculation can be performed by the use of the ideal gas law; $pV=mRT$ Where:

$$\begin{aligned} p &= 14.7 \text{ psi} \\ V &= 3.83 \text{ ft}^3 \\ m &= \text{mass of gas (unknown)} \\ R &= (1545.33 \text{ ft-lbf/pmole-}^\circ\text{R})/(\text{Molecular Weight}) \\ T &= 528^\circ \text{ R } (68 + 460) \end{aligned}$$

Emissions from filling one 28 gallon cylinder are:

$$\text{m of telone} = \frac{((14.7 \text{ lbs/in}^2)(144 \text{ in}^2/\text{ft}^2)(3.83 \text{ ft}^3))}{(528^\circ\text{R})(1545.33 \text{ ft-lbf/pmole-}^\circ\text{R}/110.98 \text{ pmole})} = 1.1027 \text{ lbs}$$

$$\text{PTE telone} = (1.1027 \text{ lbs}/28 \text{ gallons})(500,000 \text{ gallons})/(2000 \text{ lbs/ton}) = 9.8 \text{ tons}$$

40 CFR Part 68 - Risk Management Planning: Accidental Release Prevention (Section 112r)

The facility is subject to the requirements of this part. The facility has submitted an RMP to San Benito County Environmental Health and will be required to submit a revised and updated RMP by October 24, 2011 or earlier as required by 40 CFR §68.190. An appropriate condition will be included on the permit to ensure compliance with these requirements.

40 CFR Part 82 - Protection of Stratospheric Ozone

This facility is in compliance with the requirements of this part. An appropriate condition will be included on the permit to ensure compliance with these requirements.

THE FOLLOWING CONDITIONS WILL BE INCLUDED ON THE TITLE V PERMIT:

FEDERALLY ENFORCEABLE EMISSION LIMITS AND STANDARDS

1. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three (3) minutes in any one (1) hour which is as dark or darker than Ringelmann 1 or equivalent 20% opacity. [District Rule 400]
2. Particulate matter shall not exceed 0.15 grains per standard dry cubic foot in any exhaust stream. [District Rule 403]
3. No more than 40 pounds per day of volatile organic compounds shall be discharged from the Paint Spray Facility. [District Rule 416]
4. Trical shall limit emissions of volatile organic compounds by the use of architectural coatings which comply with the requirements of District Rule 426. [District Rule 426]
5. Trical shall limit emissions of volatile organic compounds during solvent cleaning and degreasing operations pursuant to the requirements of District Rule 433. [District Rule 433]
6. If total combined usage of coatings applied to metal parts and products, as defined by District Rule 434, equals or exceeds 55 gallons per year, each coating used for metal parts

and products must not exceed the following volatile organic compound (VOC) content limits [District Rule 434]:

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

7. Trical shall comply with the requirements of Sections 61.145 through 61.147 of the National Emission Standard for Asbestos for all demolition and renovation projects. [40 CFR Part 61, Subpart M]
8. Trical shall comply with the requirements of 40 CFR Part 68 - Risk Management Plans. Trical's Risk Management Plan must be revised and updated by October 24, 2011 or earlier as required by 40 CFR §68.190. Trical shall certify compliance with these requirements as part of the annual compliance certification required by 40 CFR Part 70 and this permit. [40 CFR Part 68]
10. Trical shall comply with the requirements of 40 CFR Part 82 - Protection of Stratospheric Ozone [40 CFR Part 82]

TESTING REQUIREMENTS AND PROCEDURES

11. No testing is specified for the generic (Rule 400) opacity requirement from condition number 1. This equipment is assumed to be in compliance with the opacity requirement based upon the information contained in the engineering evaluation. If testing is conducted for condition number 1, Trical should conduct testing in accordance with the methodology contained in EPA Method 9 and the averaging/aggregating period contained in District Rule 400. [District Rule 218]
12. No testing is specified for the generic (Rule 403) particulate matter emission standard from condition number 2. This equipment is assumed to be in compliance with the particulate matter emission standard based upon the information contained in the engineering evaluation. If testing is conducted for condition number 2, Trical should conduct testing in accordance with the methodology contained in EPA Method 5. [District Rule 218]

RECORD KEEPING REQUIREMENTS

13. Trical shall maintain a daily log which records the amount and type of solvent containing material consumed in the paint spray booth to verify compliance with condition 3. [District Rule 218]

14. Trical shall maintain a monthly log of the facility-wide total volume of make-up solvent used, and waste solvent disposed of or recycled, for all cleaning devices using volatile organic compounds for solvent cleaning and degreasing. [District Rule 433]

The record keeping provisions of this condition do not apply to remote reservoir cold cleaners which are serviced by an independent contractor. For such remote cold cleaners, evidence of service shall be maintained.

15. Trical shall maintain monthly records sufficient to verify compliance with condition 6. These records shall contain at a minimum: the types of all coatings used; the name of each coating and manufacturer; the VOC content of each coating; the VOC, water and exempt compound content of reducers; and the mix ratio of coatings and reducers. [District Rule 434]

16. As applicable Trical shall maintain the following general records of required monitoring information [District Rule 218]:

- A) the date and time of sampling or measurements;
- B) the date(s) analyses were performed;
- C) the company or entity that performed the analyses;
- D) the analytical techniques or methods used;
- E) the results of such analyses;
- F) the operating conditions existing at the time of sampling or measurement; and
- G) the records of quality assurance for continuous monitoring systems (including, but not limited to quality control activities, audits, and calibration drift checks) and source testing methods.

17. Trical shall maintain records on the occurrence and duration of any start-up, shutdown, or malfunction in the operation of the equipment under this permit. [District Rule 218]

18. Trical shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring, sample collection, measurement, report, and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. [District Rule 218]

REPORTING REQUIREMENTS

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

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

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

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

- A) identification of each term or condition of the permit that is the basis of the certification; and
- B) the compliance status; and
- C) whether compliance was continuous or intermittent; and
- D) the method(s) used for determining the compliance status of the source, currently and over the reporting period.

GENERAL CONDITIONS

- 22. Trical shall comply with all conditions of this federal operating permit. Any noncompliance with a permit condition constitutes a violation of the Federal Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. [District Rule 218]
- 23. In an enforcement action, the fact that Trical would have to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit is not a defense. [District Rule 218]
- 24. This permit may be modified, revoked, reopened and reissued, or terminated for cause as determined by the District. The filing of a request by Trical for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 218]
- 25. This permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations. [District Rule 218]
- 26. Trical shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, Trical shall also furnish to the District copies of records required to be retained by this permit. [District Rule 218]
- 27. For applicable requirements that will become effective during the permit term, Trical

shall meet such requirements on a timely basis unless a more detailed schedule is expressly required by the applicable requirement. [District Rule 218]

28. Any document submitted to the District pursuant to this permit shall contain certification by the responsible official of truth, accuracy and completeness. All certifications shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. Trical shall promptly, upon discovery, report to the District a material error or omission in these records, reports, plans, or other documents. [District Rule 218]
29. Trical shall report any violation of any requirement contained in this permit to the District within 96 hours after such occurrence. The violation report shall include the time intervals, date and magnitude of excess emissions; nature and cause of the excess (if known), corrective actions and preventive measures adopted. [District Rule 218]
30. Upon any administrative or judicial challenge, all the emission limits, specific and general conditions, monitoring, record keeping, and reporting requirements of this permit, except those being challenged, remain valid and must be complied with. [District Rule 218]
31. For this federal operating permit to remain valid through the permit term of five years from the date of issuance, Trical shall pay an annual emission fee based upon the requirements of District Rule 308. [District Rule 218]
32. Trical shall have available at the facility at all times a copy of this federal operating permit. [District Rule 218]
33. For protection from enforcement action based upon an emergency, as defined in District Rule 218, the responsible official for Trical shall submit to the District relevant evidence which demonstrates [District Rule 218]:
 - A) an emergency occurred; and
 - B) that Trical can identify the cause(s) of the emergency; and
 - C) that the facility was being properly operated at the time of the emergency; and
 - D) that all steps were taken to minimize the emissions resulting from the emergency; and
 - E) within two working days of the emergency event, Trical provided the District with a description of the emergency and any mitigating or corrective actions taken.

34. Upon presentation of credentials, Trical shall allow the District, the ARB, the EPA, or an authorized representative, to perform the following [District Rule 218]:
- A) enter upon the premises where the federal operating permit source is located or in which any records are required to be kept under the terms and conditions of this federal operating permit;
 - B) to have access to and copy any records required to be kept under the terms and conditions of this federal operating permit;
 - C) to inspect any equipment, operation, or process described or required in this federal operating permit; and,
 - D) to sample emissions from the source.
