



**OCT 01 2013**

Mr. Michael Mayes  
Calif State Prison - Avenal  
P.O. Box 8  
Avenal, CA 93204

**Re: Proposed Authority to Construct/Certificate of Conformity (Minor Mod)  
District Facility # C-195  
Project # C-1132116**

Dear Mr. Mayes:

Enclosed for your review is the District's analysis of an application for Authorities to Construct for the facility identified above. You requested that Certificates of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. The applicant proposes to limit pre-control PM10 emissions to less than 70 tons/year for two woodworking operations listed under permit C-195-4 and C-1956.

After addressing all comments made during the 45-day EPA comment period, the District intends to issue the Authorities to Construct with Certificates of Conformity. Prior to operating with modifications authorized by the Authorities to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

If you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

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**Northern Region**  
4800 Enterprise Way  
Modesto, CA 95356-8718  
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**Central Region (Main Office)**  
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Bakersfield, CA 93308-9725  
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Mr. Michael Mayes  
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Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Warner", with a long horizontal flourish extending to the right.

David Warner  
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

# San Joaquin Valley Air Pollution Control District

## Authority to Construct

### Application Review

### Woodworking Operation

Facility Name: Calif State Prison - Avenal  
Mailing Address: P.O. Box 8  
Avenal, CA 93204  
Contact Person: Michael Mayes  
Telephone: (559) 386-0587 ext. 5033  
Application # (#'s): C-195-4-3 and -6-3  
Project #: C-1132116  
Deemed Complete: August 22, 2013

Date: September 24, 2013  
Engineer: Jesse A. Garcia  
Lead Engineer: Joven Refuerzo

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#### I. Proposal

Calif State Prison - Avenal is applying for an Authority to Construct permit to modify two of its existing woodworking operations, each served by a dust collector. The applicant proposes to limit the pre-control emissions to less than 70 tons/year to satisfy condition # 4 of the current permit to operate (PTO). See Appendix B for current PTO.

Calif State Prison - Avenal has received their Title V Permit. This modification can be classified as a Title V minor modification pursuant to Rule 2520, and can be processed with a Certificate of Conformity (COC). Since the facility has specifically requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct. Calif State Prison - Avenal must apply to administratively amend their Title V permit.

#### II. Applicable Rules

Rule 2201 New and Modified Stationary Source Review Rule (12/19/06)  
Rule 2410 Prevention of Significant Deterioration (6/16/11)  
Rule 2520 Federally Mandated Operating Permits (6/21/01)  
Rule 4101 Visible Emissions (2/17/05)  
Rule 4102 Nuisance (12/17/92)  
Rule 4201 Particulate Matter Concentration (12/17/92)  
40 CFR Part 64 Compliance Assurance Monitoring  
CH&SC 41700 Risk Management Review  
CH&SC 42301.6 School Notice  
Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)  
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387:  
CEQA Guidelines

### **III. Project Location**

This equipment is located at 1 Kinds Way in Avenal, CA. The District has verified that this equipment [is/is not located within 1,000 feet of the outer boundary of a K-12 school. There is not an increase in hazardous air contaminants. Therefore, the noticing requirements of California Health and Safety Code Section 42301.6 do not apply to this operation.

### **IV. Process Description**

Calif State Prison - Avenal operates various woodworking equipment. Common woodworking operations include sawing, chipping, shaping, moulding, hogging, lathing, and sanding.

### **V. Equipment Listing**

#### Pre-Project Equipment Description:

C-195-4-2: WOODWORKING OPERATION SERVED BY TORIT MODEL 30 CYCLONE DUST COLLECTOR, SN 224053, WITH TORIT CABINET-TYPE BAGHOUSE

C-195-6-2: WOODWORKING OPERATION SERVED BY TORIT MODEL 30 FM CYCLONE DUST COLLECTOR, SERIES 30-15 WITH BAGHOUSE

#### Modification:

C-195-4-2: MODIFICATION OF WOODWORKING OPERATION SERVED BY TORIT MODEL 30 CYCLONE DUST COLLECTOR, SN 224053, WITH TORIT CABINET-TYPE BAGHOUSE: LIMIT PRE-CONTROL EMISSIONS TO LESS THAN 70 TONS/YEAR

C-195-6-2: MODIFICATION OF WOODWORKING OPERATION SERVED BY TORIT MODEL 30 FM CYCLONE DUST COLLECTOR, SERIES 30-15 WITH BAGHOUSE: LIMIT PRE-CONTROL EMISSIONS TO LESS THAN 70 TONS/YEAR

#### Post-Project Equipment Description:

C-195-4-3: WOODWORKING OPERATION SERVED BY TORIT MODEL 30 CYCLONE DUST COLLECTOR, SN 224053, WITH TORIT CABINET-TYPE BAGHOUSE

C-195-6-3: WOODWORKING OPERATION SERVED BY TORIT MODEL 30 FM CYCLONE DUST COLLECTOR, SERIES 30-15 WITH BAGHOUSE

## VI. Emission Control Technology Evaluation

These woodworking operations are served by existing dust collectors. District practice is to allow a 90% control efficiency for dust collectors (the 90% control efficiency is also confirmed by the source tests performed by South Coast AQMD for uncontrolled operations and operations controlled by cyclones as presented in the Woodworking GEAR).

## VII. General Calculations

### A. Assumptions

1. 40% of the total particulate matter generated by the woodworking operations is PM10 (CARB speciation manual).
2. PM<sub>10</sub> will be the only pollutant emission associated with this project.
3. The dust collector will control 90% of the PM<sub>10</sub> emissions. (District Practice)
4. Operating Schedule: 24 hr/day, 365 day/yr (worst case)

As determined in Title V Renewal Project C-1103198

5. Unit C-195-4 has an airflow of 15,271 cfm
6. Unit C-195-6 has an airflow of 20,362 cfm

### B. Emission Factors

#### Pre-Project:

The current PTO only lists 0.1 gr/dscf as the only emission limit; however, pursuant to District Policy 1110, Use of Revised Generally Accepted Emission Factors, the pre-project emission factor to be used is taken from the GEAR for woodworking and is follows:

Woodworking Emissions Factors		
Control	PM10 Emissions (gr/dscf)	Source
Cyclone	0.005	South Coast AQMD source test

#### Post-Project

Since there is no change in control equipment, the post-project emission factor = the pre-project emission factor:

Woodworking Emissions Factors		
Control	PM10 Emissions (gr/dscf)	Source
Cyclone	0.005	South Coast AQMD source test

## C. Calculations

### 1. Pre-Project Potential to Emit (PE1)

#### C-195-4:

Daily PE1 = PM10 Concentration x minutes operated per day x exhaust flowrate

$$= 0.005 \text{ gr/dscf} \times 1440 \text{ min/day} \times 15,271 \text{ dscf/min} \times \text{lb}/7000 \text{ gr}$$
$$= 15.7 \text{ lb PM10/day}$$

Annual PE1 = Daily PE1 x 365 days  
= 15.7 lb PM10/day x 365 days  
= 5,731 lb PM10/year

#### C-195-6:

Daily PE1 = PM10 Concentration x minutes operated per day x exhaust flowrate

$$= 0.005 \text{ gr/dscf} \times 1440 \text{ min/day} \times 20,362 \text{ dscf/min} \times \text{lb}/7000 \text{ gr}$$
$$= 20.9 \text{ lb PM10/day}$$

Annual PE1 = Daily PE1 x 365 days  
= 20.9 lb PM10/day x 365 days  
= 7,629 lb PM10/year

### 2. Post Project Potential to Emit (PE2)

Since there is no change in airflow or control efficiency, PE2 = PE1, therefore:

#### C-195-4:

Daily PE1 = 15.7 lb PM10/day  
Annual PE1 = 5,731 lb PM10/year

#### C-195-6:

Daily PE1 = 20.9 lb PM10/day  
Annual PE1 = 7,629 lb PM10/year

### 3. Pre-Project Stationary Source Potential to Emit (SSPE1)

Pursuant to Section 4.9 of District Rule 2201, the Pre-Project Stationary Source Potential to Emit (SSPE1) is the Potential to Emit (PE) from all units with valid ATCs or PTOs at the Stationary Source and the quantity of Emission Reduction Credits (ERCs) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

The following was taken from project C-1131806:

<b>SSPE1 (lb/year)</b>					
Permit Unit	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
C-195-1-7	34,828	1,386	4,206	81,192	40,250
C-195-2-10	0	0	0	0	0
C-195-3-6	34,828	1,386	4,206	81,192	40,250
C-195-4-2	0	0	5,731	0	0
C-195-6-2	0	0	7,629	0	0
C-195-8-2	0	0	7,300	0	0
C-195-9-4	0	0	0	0	14,600
C-195-10-2	4,953	658	679	2,144	793
C-195-12-9	1,759	627	3,078	16,271	880
C-195-13-9	665	237	1,163	6,150	332
C-195-16-1	686	30	12	7	3
C-195-17-2	0	0	0	0	876
<b>SSPE1</b>	<b>77,719</b>	<b>4,324</b>	<b>34,004</b>	<b>186,956</b>	<b>97,984</b>

#### 4. Post-Project Stationary Source Potential to Emit (SSPE2)

Pursuant to Section 4.10 of District Rule 2201, the Post Project Stationary Source Potential to Emit (SSPE2) is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

<b>SSPE2 (lb/year)</b>					
Permit Unit	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
C-195-1-7	34,828	1,386	4,206	81,192	40,250
C-195-2-10	0	0	0	0	0
C-195-3-6	34,828	1,386	4,206	81,192	40,250
C-195-4-3	0	0	5,731	0	0
C-195-6-3	0	0	7,629	0	0
C-195-8-2	0	0	7,300	0	0
C-195-9-4	0	0	0	0	14,600
C-195-10-2	4,953	658	679	2,144	793
C-195-12-9	1,759	627	3,078	16,271	880
C-195-13-9	665	237	1,163	6,150	332
C-195-16-1	686	30	12	7	3
C-195-17-2	0	0	0	0	876
<b>SSPE2</b>	<b>77,719</b>	<b>4,324</b>	<b>34,004</b>	<b>186,956</b>	<b>97,984</b>

#### 5. Major Source Determination

##### Rule 2201 Major Source Determination:

Pursuant to District Rule 2201, a Major Source is a stationary source with a SSPE2 equal to or exceeding one or more of the following threshold values. For

the purposes of determining major source status the following shall not be included:

- any ERCs associated with the stationary source
- Emissions from non-road IC engines (i.e. IC engines at a particular site at the facility for less than 12 months)
- Fugitive emissions, except for the specific source categories specified in 40 CFR 51.165

<b>Rule 2201 Major Source Determination (lb/year)</b>					
	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	CO	VOC
SSPE1	77,719	4,324	34,004	186,956	97,984
SSPE2	77,719	4,324	34,004	186,956	97,984
Major Source Threshold	20,000	140,000	140,000	200,000	20,000
Major Source?	Yes	No	No	No	Yes

As seen in the table above, the facility is an existing Major Source for NO<sub>x</sub> and VOC emissions and will remain a major source for NO<sub>x</sub> and VOC with this project. The facility is not an existing Major Source for any other pollutant and will not become a Major Source for other pollutants with this project.

**Rule 2410 Major Source Determination:**

The facility or the equipment evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21 (b)(1)(i). Therefore, the following PSD Major Source thresholds are applicable.

<b>PSD Major Source Determination (tons/year)</b>							
	NO <sub>2</sub>	VOC	SO <sub>2</sub>	CO	PM	PM <sub>10</sub>	CO <sub>2</sub> e <sup>1</sup>
Estimated Facility PE before Project Increase	39	49	2	92	18	18	60,481
PSD Major Source Thresholds	250	250	250	250	250	250	100,000
PSD Major Source ? (Y/N)	N	N	N	N	N	N	N

As shown above, the facility is not an existing major source for PSD for any one pollutant; therefore, the facility is not an existing major source for PSD.

**6. Baseline Emissions (BE)**

BE = Pre-project Potential to Emit for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or

<sup>1</sup> Greenhouse Gas (GHG)/CO<sub>2</sub>e emissions are calculated in Project C-1131806.

- Any Clean Emissions Unit, located at a Major Source.

otherwise,

BE = Historic Actual Emissions (HAE), calculated pursuant to Section 3.23

Since both of the units in this project are equipped with a dust collector, they can be classified as a Clean Emissions Unit (See Appendix E for BACT Guideline 8.1.1).

Therefore, BE = PE1 for both units:

Unit	PE1 (lb/year)	BE (lb/year)
C-195-4	5,731	5,731
C-194-6	7,629	7,629

## 7. SB 288 Major Modification

SB 288 Major Modification is defined in 40 CFR Part 51.165 as "any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act."

Since this source is not included in the 28 specific source categories specified in 40 CFR 51.165, the, increases in fugitive emissions are not included in the SB 288 Major Modification calculation.

Since this facility is a major source for NOx and VOC, the project's PE2 is compared to the SB 288 Major Modification Thresholds in the following table in order to determine if the SB 288 Major Modification calculation is required.

SB 288 Major Modification Thresholds			
Pollutant	Project PE2 (lb/year)	Threshold (lb/year)	SB 288 Major Modification Calculation Required?
NOx	0	50,000	No
VOC	0	50,000	No

Since none of the SB 288 Major Modification Thresholds are surpassed with this project, this project does not constitute an SB 288 Major Modification.

## 8. Federal Major Modification

District Rule 2201 states that a Federal Major Modification is the same as a "Major Modification" as defined in 40 CFR 51.165 and part D of Title I of the CAA.

The determination of Federal Major Modification is based on a two-step test. For the first step, only the emission *increases* are counted. Emission decreases may not cancel out the increases for this determination.

### Step 1

For existing emissions units, the increase in emissions is calculated as follows.

$$\text{Emission Increase} = \text{PAE} - \text{BAE} - \text{UBC}$$

Where: PAE = Projected Actual Emissions, and  
BAE = Baseline Actual Emissions  
UBC = Unused baseline capacity

If there is no increase in design capacity or potential to emit, the PAE is equal to the annual emission rate at which the unit is projected to emit in any one year, selected by the operator, within 5 years after the unit resumes normal operation (10 years for existing units with an increase in design capacity or potential to emit). If detailed PAE are not provided, the PAE is equal to the PE2 for each permit unit.

The BAE is calculated based on historical emissions and operating records for any 24 month period, selected by the operator, within the previous 10 year period (5 years for electric utility steam generating units). The BAE must be adjusted to exclude any non-compliant operation emissions and emissions that are no longer allowed due to lower applicable emission limits that were in effect when this application was deemed complete.

The project's combined total emission increases are compared to the Federal Major Modification Thresholds in the following table.

<b>Federal Major Modification Thresholds for Emission Increases</b>			
Pollutant	Total Emissions Increases (lb/yr)	Thresholds (lb/yr)	Federal Major Modification?
NO <sub>x</sub> *	0	0	No
VOC*	0	0	No

\*If there is any emission increases in NO<sub>x</sub> or VOC, this project is a Federal Major Modification and no further analysis is required.

Since none of the Federal Major Modification Thresholds are being surpassed with this project, this project does not constitute a Federal Major Modification and no further analysis is required.

## **9. Rule 2410 – Prevention of Significant Deterioration (PSD) Applicability Determination**

Rule 2410 applies to pollutants for which the District is in attainment or for unclassified, pollutants. The pollutants addressed in the PSD applicability determination are listed as follows:

- NO<sub>2</sub> (as a primary pollutant)
- SO<sub>2</sub> (as a primary pollutant)
- CO
- PM
- PM<sub>10</sub>
- Greenhouse gases (GHG): CO<sub>2</sub>, N<sub>2</sub>O, CH<sub>4</sub>, HFCs, PFCs, and SF<sub>6</sub>

The first step of this PSD evaluation consists of determining whether the facility is an existing PSD Major Source or not (See Section VII.C.5 of this document).

In the case the facility is an existing PSD Major Source, the second step of the PSD evaluation is to determine if the project results in a PSD significant increase.

In the case the facility is NOT an existing PSD Major Source but is an existing source, the second step of the PSD evaluation is to determine if the project, by itself, would be a PSD major source.

In the case the facility is new source, the second step of the PSD evaluation is to determine if this new facility will become a new PSD major Source as a result of the project and if so, to determine which pollutant will result in a PSD significant increase.

### **I. Potential to Emit for New or Modified Emission Units vs PSD Major Source Thresholds**

As a screening tool, the project potential to emit from all new and modified units is compared to the PSD major source threshold, and if total project potential to emit from all new and modified units is below this threshold, no further analysis will be needed.

The facility or the equipment evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21 (b)(1)(i). Therefore, the following PSD Major Source thresholds are applicable.

<b>PSD Major Source Determination: Potential to Emit (tons/year)</b>							
	NO <sub>2</sub>	VOC	SO <sub>2</sub>	CO	PM	PM <sub>10</sub>	CO <sub>2</sub> e <sup>2</sup>
Total PE from New and Modified Units	1.76	0.88	0.63	16.27	3.08	3.08	25,719.12
PSD Major Source threshold	250	250	250	250	250	250	100,000
New PSD Major Source?	N	N	N	N	N	N	N

As shown in the table above, the project potential to emit, by itself, does not exceed any of the PSD major source thresholds; therefore, Rule 2410 is not applicable and no further discussion is required.

### 10. Quarterly Net Emissions Change (QNEC)

The QNEC is calculated solely to establish emissions that are used to complete the District's PAS emissions profile screen. Detailed QNEC calculations are included in Appendix C.

## VIII. Compliance

### Rule 2201 New and Modified Stationary Source Review Rule

#### A. Best Available Control Technology (BACT)

##### 1. BACT Applicability

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis. Unless specifically exempted by Rule 2201, BACT shall be required for the following actions:

- a. Any new emissions unit with a potential to emit exceeding two pounds per day,
- b. The relocation from one Stationary Source to another of an existing emissions unit with a potential to emit exceeding two pounds per day,
- c. Modifications to an existing emissions unit with a valid Permit to Operate resulting in an AIPE exceeding two pounds per day, and/or
- d. Any new or modified emissions unit, in a stationary source project, which results in an SB 288 Major Modification or a Federal Major Modification, as defined by the rule.

##### a. New emissions units – PE > 2.0 lb/day

As discussed in Section I above, there are no new emissions units associated with this project; therefore, BACT for new units with PE > 2.0 lb/day purposes is not triggered.

<sup>2</sup> Greenhouse Gas (GHG)/CO<sub>2</sub>e emissions are calculated in Appendix F.

**b. Relocation of emissions units – PE > 2.0 lb/day**

As discussed in Section I above, there are no emissions units being relocated from one stationary source to another; therefore, BACT for relocated units with PE > 2.0 lb/day purposes is not triggered.

**c. Modification of emissions units – AIPE > 2.0 lb/day**

This project is for the modification of two woodworking operations to limit pre-control emissions to less than 70 tons/year. As seen in section VII.C, there are no changes in emissions or emission factors; therefore, BACT is not triggered for AIPE > 2.0 lb/day purposes.

**d. SB 288/Federal Major Modification**

As discussed in Sections VII.C.7 and VII.C.8 above, this project constitutes neither an SB 288 nor a Federal Major Modification; therefore, BACT is not triggered for major modification purposes.

**2. BACT Guideline**

Since BACT is not triggered, the proposed operations are not subject to any BACT guideline. No further discussion is required.

**B. Offsets**

**1. Offset Applicability**

Offset requirements shall be triggered on a pollutant-by-pollutant basis. Unless exempted pursuant to District Rule 2201, Section 4.6, offsets requirements will be triggered if the post-project SSPE2 equals or exceeds the following offset threshold levels.

This project only involves PM10 emissions units. The following table compares the Post-Project Stationary Source Potential to Emit (SSPE2) to the offset thresholds in order to determine whether offset requirements are triggered as the result of this project.

<b>Pollutant</b>	<b>SSPE2</b>	<b>Offset Thresholds</b>	<b>Offsets triggered ?</b>
<b>PM<sub>10</sub></b>	34,004 lb-PM <sub>10</sub> /year	29,200 lb-PM <sub>10</sub> /year	Yes

## 2. Quantity of Offsets Required (QOR)

As seen above, the SSPE2 is greater than the offset thresholds for PM10 only. Therefore offset calculations will be required for this project.

The quantity of offsets in pounds per year for PM10 is calculated as follows for sources with an SSPE1 greater than the offset threshold levels before implementing the project being evaluated.

Offsets Required (lb/year) =  $(\Sigma[PE2 - BE] + ICCE) \times DOR$ , for all new or modified emissions units in the project,

Where,

PE2 = Post Project Potential to Emit, (lb/year)

BE = Baseline Emissions, (lb/year)

ICCE = Increase in Cargo Carrier Emissions, (lb/year)

DOR = Distance Offset Ratio, determined pursuant to Section 4.8

BE = PE1 as determined in Section VII.C.6:

There are no increases in cargo carrier emissions; therefore offsets can be determined as follows:

$$\begin{aligned} \text{Offsets Required (lb/year)} &= ([PE2 - BE] + ICCE) \times DOR \\ &= \{[(5,731 + 7,629) \text{ lb/year} - (5,731 + 7,629) \text{ lb/year}] \\ &\quad + ICCE\} \times DOR \\ &= [(13,360 - 13,360) \text{ lb/year} + ICCE] \times DOR \\ &= 0 \text{ lb/year} \end{aligned}$$

As seen above, the project does not require offsets.

## C. Public Notification

### 1. Applicability

Public noticing is required for:

- a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications,
- b. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,
- c. Any project which results in the offset thresholds being surpassed, and/or
- d. Any project with an SSPE of greater than 20,000 lb/year for any pollutant.

**a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications**

New Major Sources are new facilities, which are also Major Sources. Since this is not a new facility, public noticing is not required for this project for New Major Source purposes.

As demonstrated in VII.C.7 and VII.C.8, this project does not constitute an SB 288 or Federal Major Modification; therefore, public noticing for SB 288 or Federal Major Modification purposes is not required.

**b. PE > 100 lb/day**

Applications which include a new emissions unit with a PE greater than 100 pounds during any one day for any pollutant will trigger public noticing requirements. There are no new emissions units associated with this project. Therefore, public noticing is not required for this project for PE > 100 lb/day.

**c. Offset Threshold**

The SSPE1 and SSPE2 are compared to the offset thresholds in the following table.

Offset Thresholds				
Pollutant	SSPE1 (lb/year)	SSPE2 (lb/year)	Offset Threshold	Public Notice Required?
NO <sub>x</sub>	77,719	77,719	20,000 lb/year	No
SO <sub>x</sub>	4,324	4,324	54,750 lb/year	No
PM <sub>10</sub>	34,004	34,004	29,200 lb/year	No
CO	186,956	186,956	200,000 lb/year	No
VOC	97,984	97,984	20,000 lb/year	No

As detailed above, there were no thresholds surpassed with this project; therefore, public noticing is not required for offset purposes.

**d. SSIPE > 20,000 lb/year**

Public notification is required for any permitting action that results in a SSIPE of more than 20,000 lb/year of any affected pollutant. According to District policy, the SSIPE = SSPE2 – SSPE1. The SSIPE is compared to the SSIPE Public Notice thresholds in the following table.

<b>SSIPE Public Notice Thresholds</b>					
<b>Pollutant</b>	<b>SSPE2 (lb/year)</b>	<b>SSPE1 (lb/year)</b>	<b>SSIPE (lb/year)</b>	<b>SSIPE Public Notice Threshold</b>	<b>Public Notice Required?</b>
NO <sub>x</sub>	77,719	77,719	0	20,000 lb/year	No
SO <sub>x</sub>	4,324	4,324	0	20,000 lb/year	No
PM <sub>10</sub>	34,004	34,004	0	20,000 lb/year	No
CO	186,956	186,956	0	20,000 lb/year	No
VOC	97,984	97,984	0	20,000 lb/year	No

As demonstrated above, the SSIPE for all pollutants is less than 20,000 lb/year; therefore, public noticing for SSIPE purposes is not required.

## **2. Public Notice Action**

As discussed above, this project will not result in emissions, for any pollutant, which would subject the project to any of the noticing requirements of this rule. Therefore, public notice will not be required for this project.

## **D. Daily Emission Limits (DELs)**

DELs are required by Rule 2201 3.17. For this operation, the CFM rating in the permit equipment description and the following condition will enforce the DEL:

- PM10 emissions from the dust collector shall not exceed 0.005 gr/dscf. [District Rule 2201] N

## **E. Compliance Assurance**

### **1. Source Testing**

District Policy 1705 (10/9/97) section II step 4 requires initial source testing for non-combustion equipment served by a baghouse with expected PM10 emissions of 30 pounds per day or greater. Pursuant to section VII.C.1 of this document, the PM10 emissions from this permit unit will not exceed 30 pounds per day; therefore, initial source testing will not be required.

### **2. Monitoring**

No monitoring is required to demonstrate compliance with Rule 2201.

### **3. Record Keeping**

The following conditions will be placed on the Authority to Construct Permit.

- Records of all maintenance of the dust collector, including all change outs of filter media, shall be maintained. [District Rule 2201]

- {1958} All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

#### **4. Reporting**

No reporting is required to demonstrate compliance with Rule 2201.

#### **Rule 2520 Federally Mandated Operating Permits**

This facility is subject to this Rule, and has received their Title V Operating Permit. The proposed modification is a Minor Modification to the Title V Permit.

In accordance with Rule 2520, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
  - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
  - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

As discussed above, the facility has applied for a Certificate of Conformity (COC). Therefore, the facility must apply to modify their Title V permit with an administrative amendment, prior to operating with the proposed modifications. Continued compliance with this rule is expected. The facility may construct/operate under the ATC upon submittal of the Title V administrative amendment/minor modification application.

#### **Rule 4101 Visible Emissions**

As long as the equipment is properly maintained and operated, the emission units shall not discharge, into the atmosphere, any air contaminant, other than uncombined water vapor, for a period or periods aggregating more than three (3) minutes in any one (1) hour which is as dark, or darker, in shade as that designated as No. 1 on the Ringelmann Chart or equivalent to 20% opacity.

- {15} No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]

Per District Policy SSP 1005, the visible emissions from processes served by a baghouse or fabric filter shall not equal or exceed 5% opacity for a period or periods aggregating more than three (3) minutes in any one (1) hour. If the equipment is properly maintained this condition should not be exceeded. The following condition will be placed on the permit:

- Visible emissions from the exhaust of the dust collector(s) serving the woodworking operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]

#### **Rule 4102 Nuisance**

As long as the equipment is properly maintained and operated the emission units will not discharge any air contaminants or other materials which cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health or safety of any such person or public or which cause or have a natural tendency to cause injury or damage to business or property. Since sawdust generated from the non-treated wood is not a toxic air contaminant, this project is not subject to a health risk evaluation and a Health Risk Analysis is not necessary. The following condition will be placed on the permit:

- {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102] N

#### **Rule 4201 Particulate Matter Concentration**

Rule 4201 requires that particulate matter emissions shall not exceed 0.1 grain per cubic foot of gas at dry standard condition.

The PM10 concentration from the dust collectors is limited 0.005 grains/dscf; therefore, the particulate matter concentration from the dust collectors should be less than the maximum allowable 0.1 grains/dscf.

#### **40 CFR Part 64 Compliance Assurance Monitoring**

40 CFR Part 64 requires Compliance Assurance Monitoring (CAM) for units that meet the following three criteria:

- 1) the unit must have an emission limit for the pollutant;
- 2) the unit must have add-on controls for the pollutant; these are devices such as flue gas recirculation (FGR), baghouse, and catalytic oxidizer; and
- 3) the unit must have a pre-control potential to emit of greater than the major source thresholds.

The Major Source Threshold for PM<sub>10</sub> is 140,000 lb/year or 70 tons/year.

In the Title V Renewal Project C-1103198, the applicant proposed to limit the pre-control potential to emit to less than the major source threshold for permits C-195-4 and C-195-6 through an ATC application to comply with CAM. In this project, the applicant has proposed to limit pre-control emissions to comply with CAM and to satisfy the current PTO (See Appendix B); the following calculations demonstrate that CAM and the PTO are being satisfied:

Using the assumption that the dust collectors will have a 90% control efficiency of PM<sub>10</sub> emission established in Section VII.A:

C-195-4

$$\begin{aligned}\text{Annual PE} &= \text{PM}_{10} \text{ Concentration} \times \text{minutes operated per day} \times \text{exhaust} \\ &\quad \text{flowrate} \times 365 \text{ days} \\ &= 0.005 \text{ gr/dscf} \times 1440 \text{ min/day} \times 15,271 \text{ dscf/min} \times \text{lb}/7000 \text{ gr} \times \\ &\quad 365 \text{ days} \\ &= 5,731 \text{ lb PM}_{10}/\text{year}\end{aligned}$$

$$\begin{aligned}\text{Pre-control Annual PE} &= \text{Annual PE} \div (1 - \text{Control Efficiency}) \\ &= (5,731 \text{ lb PM}_{10}/\text{year}) \div (1 - 0.9) \\ &= 57,310 \text{ lb PM}_{10}/\text{year}\end{aligned}$$

C-195-6

$$\begin{aligned}\text{Annual PE} &= \text{PM}_{10} \text{ Concentration} \times \text{minutes operated per day} \times \text{exhaust} \\ &\quad \text{flowrate} \times 365 \text{ days} \\ &= 0.005 \text{ gr/dscf} \times 1440 \text{ min/day} \times 20,362 \text{ dscf/min} \times \text{lb}/7000 \text{ gr} \times \\ &\quad 365 \text{ days} \\ &= 7,629 \text{ lb PM}_{10}/\text{year}\end{aligned}$$

$$\begin{aligned}\text{Pre-control Annual PE} &= \text{Annual PE} \div (1 - \text{Control Efficiency}) \\ &= (7,629 \text{ lb PM}_{10}/\text{year}) \div (1 - 0.9) \\ &= 76,290 \text{ lb PM}_{10}/\text{year}\end{aligned}$$

As demonstrated above, the pre-control emissions are less 140,000 lb/year; therefore, CAM and the PTO requirements are satisfied.

**California Health & Safety Code 42301.6 (School Notice)**

The District has verified that this site is located within 1,000 feet of a school. However, pursuant to California Health and Safety Code 42301.6, since this project will not result in an increase in emissions, a school notice is not required.

## California Environmental Quality Act (CEQA)

CEQA requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The District adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities;
- Identify the ways that environmental damage can be avoided or significantly reduced;
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

The District performed an Engineering Evaluation (this document) for the proposed project and determined that all project specific emission unit(s) are exempt from Best Available Control Technology (BACT) requirements. Furthermore, the District has determined that potential emission increases would have a less than significant health impact on sensitive receptors.

Issuance of permits for emissions units not subject to BACT requirements and with health impact less than significant is a matter of ensuring conformity with applicable District rules and regulations and does not require discretionary judgment or deliberation. Thus, the District concludes that this permitting action constitutes a ministerial approval. Section 21080 of the Public Resources Code exempts from the application of CEQA those projects over which a public agency exercises only ministerial approval. Therefore, the District finds that this project is exempt from the provisions of CEQA.

### IX. Recommendation

Compliance with all applicable rules and regulations is expected. Issue ATCs C-195-4-3 and -6-3 subject to the permit conditions on the attached draft ATCs in Appendix A.

### X. Billing Information

Permit Number	Fee Schedule	Fee Description
C-195-4-3	3020-01-A	15 hp
C-195-6-3	3020-01-A	15 hp

## **Appendixes**

- A: Draft ATCs
- B: Existing PTOs
- C: QNEC Calculations
- D: Certificate of Conformity
- E: BACT Guideline

## Appendix A

### Draft ATCs

San Joaquin Valley  
Air Pollution Control District

## AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: C-195-4-3

LEGAL OWNER OR OPERATOR: CALIF STATE PRISON - AVENAL

MAILING ADDRESS: PO BOX 8  
AVENAL, CA 93204

LOCATION: 1 KINGS WAY  
AVENAL, CA 93204

### EQUIPMENT DESCRIPTION:

MODIFICATION OF WOODWORKING OPERATION SERVED BY TORIT MODEL 30 CYCLONE DUST COLLECTOR, SN 224053, WITH TORIT CABINET-TYPE BAGHOUSE: LIMIT PRE-CONTROL EMISSIONS TO LESS THAN 70 TONS-PM10/YEAR

## CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
5. Visible emissions from the exhaust of the dust collector serving the woodworking operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Dust collector exhaust fan(s) shall be switched on prior to the start-up of any woodworking equipment. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director, APCO

DAVID WARNER, Director of Permit Services

C-195-4-3 : Sep 11 2013 1:29PM - GARCIAJ : Joint Inspection NOT Required

7. All ducting and control equipment shall be in good working order to prevent fugitive particulate emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
8. All filters shall be properly maintained and must be in place during the woodworking operation(s). [District Rule 2201] Federally Enforceable Through Title V Permit
9. Each dust collector cleaning frequency and duration shall be adjusted to optimize the control efficiency [District Rule 2201] Federally Enforceable Through Title V Permit
10. Replacement filters numbering at least 10% of the total number of filters in the largest dust collector using each type of filter shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
12. PM10 emissions from the dust collector shall not exceed 0.005 gr/dscf. [District Rules 2201 and 4201] Federally Enforceable Through Title V Permit
13. Records of all maintenance of the dust collector, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
14. {1958} All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

DRAFT

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

**DRAFT**  
ISSUANCE DATE: DRAFT

**PERMIT NO:** C-195-6-3

**LEGAL OWNER OR OPERATOR:** CALIF STATE PRISON - AVENAL  
**MAILING ADDRESS:** PO BOX 8  
AVENAL, CA 93204

**LOCATION:** 1 KINGS WAY  
AVENAL, CA 93204

**EQUIPMENT DESCRIPTION:**  
MODIFICATION OF WOODWORKING OPERATION SERVED BY TORIT MODEL 30 FM CYCLONE DUST COLLECTOR, SERIES 30-15 WITH BAGHOUSE: LIMIT PRE-CONTROL EMISSIONS TO LESS THAN 70 TONS-PM10/YEAR

**CONDITIONS**

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
5. Visible emissions from the exhaust of the dust collector serving the woodworking operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Dust collector exhaust fan(s) shall be switched on prior to the start-up of any woodworking equipment. [District Rule 2201] Federally Enforceable Through Title V Permit
7. All ducting and control equipment shall be in good working order to prevent fugitive particulate emissions. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

**YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT.** This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director, APCO

**DRAFT**

DAVID WARNER, Director of Permit Services

C-195-6-3 : Sep 11 2013 1:30PM - GARCIAJ : Joint Inspection NOT Required

8. All filters shall be properly maintained and must be in place during the woodworking operation(s). [District Rule 2201] Federally Enforceable Through Title V Permit
9. Each dust collector cleaning frequency and duration shall be adjusted to optimize the control efficiency [District Rule 2201] Federally Enforceable Through Title V Permit
10. Replacement filters numbering at least 10% of the total number of filters in the largest dust collector using each type of filter shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
12. PM10 emissions from the dust collector shall not exceed 0.005 gr/dscf. [District Rules 2201 and 4201] Federally Enforceable Through Title V Permit
13. Records of all maintenance of the dust collector, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
14. {1958} All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

DRAFT

## Appendix B

### Existing PTOs

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-195-4-2

**EXPIRATION DATE:** 10/31/2016

**EQUIPMENT DESCRIPTION:**

WOODWORKING OPERATION SERVED BY TORIT MODEL 30 CYCLONE DUST COLLECTOR, SN 224053, WITH TORIT CABINET-TYPE BAGHOUSE

## PERMIT UNIT REQUIREMENTS

---

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. Within six months of the renewed Title V permit being issued, permittee shall apply for an Authority to Construct (ATC) and fully implement one of the following: 1) monitor daily visible emissions and install a pressure gauge or 2) modify pre-control emissions rate to less than 70 tons/yr. [40 CFR 64] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-195-6-2

**EXPIRATION DATE:** 10/31/2016

**EQUIPMENT DESCRIPTION:**

WOODWORKING OPERATION SERVED BY TORIT MODEL 30 FM CYCLONE DUST COLLECTOR, SERIES 30-15 WITH BAGHOUSE

## PERMIT UNIT REQUIREMENTS

---

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. Within six months of the renewed Title V permit being issued, permittee shall apply for an Authority to Construct (ATC) and fully implement one of the following: 1) install on the baghouse an air leak detection system or continuous PM10 emission monitor or 2) modify post-control PM10 emissions rate to less than 70 tons/yr, monitor daily visible emissions and install a pressure gauge or 3) modify pre-control emissions rate to less than 70 tons/yr. [40 CFR 64] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

## Appendix C

### QNEC Calculations

## Quarterly Net Emissions Change (QNEC)

The Quarterly Net Emissions Change is used to complete the emission profile screen for the District's PAS database. The QNEC shall be calculated as follows:

$QNEC = PE2 - BE$ , where:

- QNEC = Quarterly Net Emissions Change for each emissions unit, lb/qtr.
- PE2 = Post Project Potential to Emit for each emissions unit, lb/qtr.
- BE = Baseline Emissions (per Rule 2201) for each emissions unit, lb/qtr.

Using the values in Sections VII.C.2 and VII.C.6 in the evaluation above,  $PE2_{quarterly}$  and  $BE_{quarterly}$  can be calculated as follows:

PE2 <sub>Quarterly</sub> C-195-4					
PM <sub>10</sub>	5,731	(lb/year) ÷	4	(qtr/year) =	1,433 (lb/qtr)

PE2 <sub>Quarterly</sub> C-195-6					
PM <sub>10</sub>	7,629	(lb/year) ÷	4	(qtr/year) =	1,907 (lb/qtr)

$BE_{quarterly} = BE_{annual} \div 4$  quarters/year

QNEC C-195-4					
Pollutant	PE2		BE		QNEC
PM <sub>10</sub>	1,433	(lb/qtr) -	1,433 (lb/qtr) =	0	(lb/qtr)

QNEC C-195-6					
Pollutant	PE2		BE		QNEC
PM <sub>10</sub>	1,907	(lb/qtr) -	1,907 (lb/qtr) =	0	(lb/qtr)

## Appendix D

### Certificate of Conformity

JUN 27 2013

Permits Services  
SJVAPCD

San Joaquin Valley  
Unified Air Pollution Control District

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box) PTO C-195-6-2

- SIGNIFICANT PERMIT MODIFICATION
- MINOR PERMIT MODIFICATION
- ADMINISTRATIVE AMENDMENT

COMPANY NAME: AVENAL STATE PRISON	FACILITY ID: C- 195
1. Type of Organization: <input type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input checked="" type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: STATE OF CALIFORNIA, CDCR, AVENAL STATE PRISON	
3. Agent to the Owner:	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

*M. Mayes*  
Signature of Responsible Official

6-20-13  
Date

MICHAEL MAYES  
Name of Responsible Official (please print)

ASSOCIATE WARDEN, BUSINESS SERVICES  
Title of Responsible Official (please print)

## Appendix E

### BACT Guideline

San Joaquin Valley  
Unified Air Pollution Control District

**Best Available Control Technology (BACT) Guideline 8.1.1\***

Last Update 5/16/1995

**Wood Working Equipment - = or > 30 electric hp of woodworking  
equipment or = or > 100 board feet processed/day**

<b>Pollutant</b>	<b>Achieved in Practice or contained in the SIP</b>	<b>Technologically Feasible</b>	<b>Alternate Basic Equipment</b>
PM10	Wood working equipment vented to a baghouse		

BACT is the most stringent control technique for the emissions unit and class of source. Control techniques that are not achieved in practice or contained in a state implementation plan must be cost effective as well as feasible. Economic analysis to demonstrate cost effectiveness is required for all determinations that are not achieved in practice or contained in an EPA approved State Implementation Plan.

**\*This is a Summary Page for this Class of Source**