



NOV 17 2014

Mr. Mirko Muller
Ardagh Glass, Inc.
24441 Avenue 12
Madera, CA 93637-9384

**Re: Proposed Authority to Construct/Certificate of Conformity (Minor Mod)
District Facility # C-801
Project # C-1142264**

Dear Mr. Muller:

Enclosed for your review is the District's analysis of an application for Authority to Construct for the facility identified above. You requested that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. The project consists of the modification of the existing raw material storage operation to remove four storage bins and their associated bin vent filters.

After addressing all comments made during the 45-day EPA comment period, the District intends to issue the Authority to Construct with a Certificate of Conformity. Prior to operating with modifications authorized by the Authority 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.

Thank you for your cooperation in this matter.

Sincerely,



Arnaud Marjollet
Director of Permit Services

Enclosures

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

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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San Joaquin Valley Air Pollution Control District

Authority to Construct Application Review

Glass Plant Raw Material Storage

Facility Name: Ardagh Glass, Inc. Date: November 5, 2014
Mailing Address: 24441 Avenue 12 Engineer: Jonah Aiyabei
Madera, CA 93637 Lead Engineer: Joven Refuerzo
Contact Person: Mirko Muller
Telephone: (559) 675-4726
E-Mail: Mirko.Muller@ardaghgroup.com
Application #(s): C-801-5-11
Project #: C-1142264
Deemed Complete: July 28, 2014

I. PROPOSAL

Ardagh Glass, Inc. has requested an Authority to Construct (ATC) permit to modify their existing raw material storage operation by removing four storage bins with their associated bin vent filters.

Ardagh Glass, Inc. 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). The facility has requested that this project be processed in that manner; therefore, the applicant will be required to submit a Title V administrative amendment application prior to operating under ATC issued from this project.

II. APPLICABLE RULES

Rule 2201 New and Modified Stationary Source Review (4/21/11)
Rule 2520 Federally Mandated Operating Permits (6/21/01)
Rule 4001 New Source Performance Standards (4/14/99)
Rule 4002 National Emission Standards for Hazardous Air Pollutants (5/20/04)
Rule 4101 Visible Emissions (2/17/05)
Rule 4102 Nuisance (12/17/92)
Rule 4201 Particulate Matter Concentration (12/17/92)
Rule 4202 Particulate Matter – Emission Rate (12/17/92)
CH&SC 41700 California Health & Safety Code, Sec 41700 - Health Risk Assessment
CH&SC 42301.6 California Health & Safety Code, Sec 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 facility is located at 24441 Avenue 12, at Road 24 1/2, Madera, CA. The District has verified that the facility is not located within 1,000 feet of any K-12 school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

IV. PROCESS DESCRIPTION

The facility manufactures container glass from the following main ingredients: silica sand, soda ash, limestone, cullet (recycled glass), and salt cake.

Materials transported to the batch house are unloaded on the unloading conveyor and are transferred to elevated levels via bucket elevator. Materials are stored in eight raw material bins located on the eighth floor. Materials are then unloaded from the silos onto a transfer conveyor belt. The conveyor belt transfers the material into a check scale and then a surge hopper. Materials are emptied into the batch mixer from the surge hopper. The batch mixer blends the powdered materials and cullet into a homogeneous product called mixed batch. This mixture is conveyed to mixed batch storage bins. There are two storage bins, with one delivering to each of the glass furnaces. Transfer points are enclosed and vented to dust collectors to minimize emissions.

V. EQUIPMENT LISTING

Pre-Project Equipment Description:

C-801-5-6: TEN 544,349 GALLON TOTAL CAPACITY RAW MATERIAL STORAGE BINS SERVED BY SIX DONALDSON TORIT (TD 486) AND TWO DONALDSON TORIT POWER CORE (CPC-3) DUST COLLECTORS, ONE BATCH WEIGH SCALE, ONE CULLET WEIGHT SCALE, AND ONE ENCLOSED CONVEYOR ALL SERVED BY A DONALDSON TORIT MODEL #TD-486 PULSE JET CARTRIDGE BAGHOUSE FED FROM THREE STORAGE BINS WITH FLEX KLEEN BIN VENTS AND ONE STORAGE BIN WITH TORIT BIN VENT, AND DONALDSON TORIT MODEL #16PJD6 BAGHOUSE SERVING SILO #3 (PELLETIZED ESP DUST)

Proposed Modification:

Remove four storage bins and associated bin vent filters.

Post-Project Equipment Description:

C-801-5-11: TEN 544,349 GALLON TOTAL CAPACITY RAW MATERIAL STORAGE BINS SERVED BY SIX DONALDSON TORIT (TD 486) AND TWO DONALDSON TORIT POWER CORE (CPC-3) DUST COLLECTORS, ONE BATCH WEIGH SCALE, ONE CULLET WEIGHT SCALE, AND ONE ENCLOSED CONVEYOR ALL SERVED BY A DONALDSON TORIT MODEL #TD-486 PULSE JET CARTRIDGE BAGHOUSE,

AND DONALDSON TORIT MODEL #16PJD6 BAGHOUSE SERVING SILO #3
(PELLETIZED ESP DUST)

VI. EMISSION CONTROL EQUIPMENT EVALUATION

PM₁₀ is the pollutant of concern emitted from the material handling operations. The PM₁₀ emissions are controlled with baghouse dust collectors and cartridge filters. There will be no change to the existing control equipment. The bins being removed are each served by bin vent filters, and these associated filters will be removed without affecting the rest of the existing material handling system.

VII. CALCULATIONS

A. Assumptions

- Maximum operating schedule = 24 hours/day, 365 days/year
- PM₁₀ = 50% PM (Rule 2201 Section 4.11.2)
- PM_{2.5} = PM₁₀ (worst case assumption, unless otherwise stated)
- Donaldson Torit 16PJD6 pulse jet dust collector Airflow = 350 ft³/min (per Applicant)
- Donaldson Torit Power Core CPC-3 pulse jet dust collector Airflow = 1,200 ft³/min (per Applicant)
- Donaldson Torit TD-486 pulse jet dust collector Airflow = 700 ft³/min (per Applicant)
- Torit bin vent filter TD 486 Airflow = 1,200 ft³/min (per Applicant)

B. Emission Factors

Raw Materials Emission Factor		
Pollutant	EF1	Source
PM ₁₀	0.0001 gr-PM/dscf	Current PTO

C. Calculations

1. Pre-Project Potential to Emit (PE1)

Donaldson Torit TD-486 Dust Collector Serving Level 3 South Day Storage Bin

$$\begin{aligned} \text{Daily PE1} &= 0.0001 \text{ gr/dscf} \div 7,000 \text{ gr/lb} \times 700 \text{ (ft}^3\text{/min)} \times 1,440 \text{ min/day} \\ &= 0.0 \text{ lb-PM}_{10}\text{/day} \end{aligned}$$

$$\begin{aligned} \text{Annual PE1} &= 0.0001 \text{ gr/dscf} \div 7,000 \text{ gr/lb} \times 700 \text{ (ft}^3\text{/min)} \times 1,440 \text{ min/day} \times 365 \text{ days/year} \\ &= 5 \text{ lb-PM}_{10}\text{/year} \end{aligned}$$

Six Donaldson Torit TD-486 and Two Donaldson Torit Power Core CPC Dust Collectors Serving Raw Materials Storage Bins

$$\text{Daily PE1} = 0.0001 \text{ gr/dscf} \div 7,000 \text{ gr/lb} \times 1,200 \text{ (ft}^3\text{/min)} \times 1,440 \text{ min/day} \times 8 \text{ dust collectors}$$

$$= 0.2 \text{ lb-PM}_{10}/\text{day}$$

$$\begin{aligned} \text{Annual PE1} &= 0.0001 \text{ gr/dscf} \div 7,000 \text{ gr/lb} \times 1,200 \text{ (ft}^3/\text{min)} \times 1,440 \text{ min/day} \times 365 \text{ days/year} \\ &\quad \times 8 \text{ dust collectors} \\ &= 72 \text{ lb-PM}_{10}/\text{year} \end{aligned}$$

Donaldson Torit 16PJD6 Dust Collector

$$\begin{aligned} \text{Daily PE1} &= 0.001 \text{ gr/dscf} \div 7,000 \text{ gr/lb} \times 350 \text{ (ft}^3/\text{min)} \times 1,440 \text{ min/day} \\ &= 0.1 \text{ lb-PM}_{10}/\text{day} \end{aligned}$$

$$\begin{aligned} \text{Annual PE1} &= 0.001 \text{ gr/dscf} \div 7,000 \text{ gr/lb} \times 350 \text{ (ft}^3/\text{min)} \times 1,440 \text{ min/day} \times 365 \text{ days/year} \\ &= 26 \text{ lb-PM}_{10}/\text{year} \end{aligned}$$

Torit Bin Vent Filter TD 486

$$\begin{aligned} \text{Daily PE1} &= 0.001 \text{ gr/dscf} \div 7,000 \text{ gr/lb} \times 1,200 \text{ (ft}^3/\text{min)} \times 1,440 \text{ min/day} \\ &= 0.2 \text{ lb-PM}_{10}/\text{day} \end{aligned}$$

$$\begin{aligned} \text{Annual PE1} &= 0.001 \text{ gr/dscf} \div 7,000 \text{ gr/lb} \times 1,200 \text{ (ft}^3/\text{min)} \times 1,440 \text{ min/day} \times 365 \text{ days/year} \\ &= 90 \text{ lb-PM}_{10}/\text{year} \end{aligned}$$

Pre-Project Potential to Emit Raw Materials		
Pollutant	Daily Emissions (lb/day)	Annual Emissions (lb/year)
PM ₁₀	0.0 + 0.2 + 0.1 + 0.2 = 0.5	5 + 72 + 26 + 90 = 193

2. Post Project Potential to Emit (PE2)

Donaldson Torit TD-486 Dust Collector Serving Level 3 South Day Storage Bin

$$\begin{aligned} \text{Daily PE2} &= 0.0001 \text{ gr/dscf} \div 7,000 \text{ gr/lb} \times 700 \text{ (ft}^3/\text{min)} \times 1,440 \text{ min/day} \\ &= 0.0 \text{ lb-PM}_{10}/\text{day} \end{aligned}$$

$$\begin{aligned} \text{Annual PE2} &= 0.0001 \text{ gr/dscf} \div 7,000 \text{ gr/lb} \times 700 \text{ (ft}^3/\text{min)} \times 1,440 \text{ min/day} \times 365 \text{ days/year} \\ &= 5 \text{ lb-PM}_{10}/\text{year} \end{aligned}$$

Six Donaldson Torit TD-486 and Two Donaldson Torit Power Core CPC Dust Collectors Serving Raw Materials Storage Bins

$$\begin{aligned} \text{Daily PE2} &= 0.0001 \text{ gr/dscf} \div 7,000 \text{ gr/lb} \times 1,200 \text{ (ft}^3/\text{min)} \times 1,440 \text{ min/day} \times 8 \text{ dust collectors} \\ &= 0.2 \text{ lb-PM}_{10}/\text{day} \end{aligned}$$

$$\begin{aligned} \text{Annual PE2} &= 0.0001 \text{ gr/dscf} \div 7,000 \text{ gr/lb} \times 1,200 \text{ (ft}^3/\text{min)} \times 1,440 \text{ min/day} \times 365 \text{ days/year} \\ &\quad \times 8 \text{ dust collectors} \\ &= 72 \text{ lb-PM}_{10}/\text{year} \end{aligned}$$

Donaldson Torit 16PJD6 Dust Collector

$$\begin{aligned} \text{Daily PE2} &= 0.001 \text{ gr/dscf} \div 7,000 \text{ gr/lb} \times 350 \text{ (ft}^3\text{/min)} \times 1,440 \text{ min/day} \\ &= 0.1 \text{ lb-PM}_{10}\text{/day} \end{aligned}$$

$$\begin{aligned} \text{Annual PE2} &= 0.001 \text{ gr/dscf} \div 7,000 \text{ gr/lb} \times 350 \text{ (ft}^3\text{/min)} \times 1,440 \text{ min/day} \times 365 \text{ days/year} \\ &= 26 \text{ lb-PM}_{10}\text{/year} \end{aligned}$$

Post-Project Potential to Emit Raw Materials		
Pollutant	Daily Emissions (lb/day)	Annual Emissions (lb/year)
PM ₁₀	0.0 + 0.2 + 0.1 = 0.3	5 + 72 + 26 = 103

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

Pursuant to District Rule 2201, the Pre-Project Stationary Source Potential to Emit (SSPE1) 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.

The Pre-Project Stationary Source Potential to Emit (SSPE1) is summarized below.

Pre-Project Stationary Source Potential to Emit [SSPE1] (lb/year)					
	NO _x	SO _x	PM ₁₀	CO	VOC
Pre-Project SSPE (SSPE1)	> 20,000	> 140,000	> 140,000	> 200,000	> 20,000

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

Pursuant to 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. The Post Project Stationary Source Potential to Emit (SSPE2) is summarized below:

Post-Project Stationary Source Potential to Emit [SSPE2] (lb/year)					
	NO _x	SO _x	PM ₁₀	CO	VOC
Post-Project SSPE (SSPE2)	> 20,000	> 140,000	> 140,000	> 200,000	> 20,000

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

Rule 2201 Major Source Determination (lb/year)						
	NO _x	SO _x	PM ₁₀	PM _{2.5}	CO	VOC
SSPE1	> 20,000	> 140,000	> 140,000	> 200,000	> 200,000	> 20,000
SSPE2	> 20,000	> 140,000	> 140,000	>200,000	>200,000	> 20,000
Major Source Threshold	20,000	140,000	140,000	200,000	200,000	20,000
Major Source?	Yes	Yes	Yes	Yes	Yes	Yes

The source is an existing Major Source for NO_x, SO_x, PM10, PM2.5, CO, and VOC and will remain a major source for these pollutants.

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)(iii). Therefore the PSD Major Source threshold is 250 tpy for any regulated NSR pollutant.

PSD Major Source Determination (tons/year)	
	NO _x
Estimated Facility PE before Project Increase	> 250
PSD Major Source Thresholds	250
PSD Major Source ? (Y/N)	Y

As shown above, the facility is an existing major source for PSD for at least one pollutant. Therefore, the facility is an existing major source for PSD.

6. Baseline Emissions (BE)

The BE calculation (in lb/year) is performed pollutant-by-pollutant for each unit within the project to calculate the QNEC, and if applicable, to determine the amount of offsets required.

Pursuant to District Rule 2201, BE = PE1 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
- Any Clean Emissions Unit, located at a Major Source.

Otherwise,

BE = Historic Actual Emissions (HAE), calculated pursuant to Section 3.22

Clean Emissions Unit, Located at a Major Source

Pursuant to Rule 2201, a Clean Emissions Unit is defined as an emissions unit that is "equipped with an emissions control technology with a minimum control efficiency of at least 95% or is equipped with emission control technology that meets the requirements for achieved-in-practice BACT as accepted by the APCO during the five years immediately prior to the submission of the complete application.

All existing emission units in this project are served by dust collectors, which have PM₁₀ control efficiencies of 99% or greater. Therefore, Baseline Emissions (BE) are equal to the Pre-Project Potential to Emit (PE1).

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 facility is a major source for NO_x, SO_x, PM₁₀ 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?
NO _x	0	50,000	No
SO _x	0	80,000	No
PM ₁₀	103	30,000	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 major modifications are also federal major modifications, unless they qualify for either a "Less-Than-Significant Emissions Increase" exclusion or a "Plantwide Applicability Limit" (PAL) exclusion.

A Less-Than-Significant Emissions Increase exclusion is for an emissions increase for the project, or a Net Emissions Increase for the project (as defined in 40 CFR 51.165 (a)(2)(ii)(B) through (D), and (F)), that is not significant for a given regulated NSR pollutant, and therefore is not a federal major modification for that pollutant.

- To determine the post-project projected actual emissions from existing units, the provisions of 40 CFR 51.165 (a)(1)(xxviii) shall be used.
- To determine the pre-project baseline actual emissions, the provisions of 40 CFR 51.165 (a)(1)(xxxv)(A) through (D) shall be used.
- If the project is determined not to be a federal major modification pursuant to the provisions of 40 CFR 51.165 (a)(2)(ii)(B), but there is a reasonable possibility that the project may result in a significant emissions increase, the owner or operator shall comply with all of the provisions of 40 CFR 51.165 (a)(6) and (a)(7).
- Emissions increases calculated pursuant to this section are significant if they exceed the significance thresholds specified in the table below.

Significant Threshold (lb/year)	
Pollutant	Threshold (lb/year)
VOC	0
NO _x	0
PM ₁₀	30,000
SO _x	80,000

The Net Emissions Increases (NEI) for purposes of determination of a "Less-Than-Significant Emissions Increase" exclusion will be calculated below to determine if this project qualifies for such an exclusion.

Net Emission Increase for Existing Units (NEI_E)

Per 40 CFR 51.165 (a)(2)(ii)(D) for existing emissions units in this project,

$$NEI_E = PE_{2E} - BAE$$

The emissions unit in this project only emits particulate matter; therefore only PM₁₀ calculations are required.

Assumed BAE = 0 for the existing units for worst case scenario; therefore $NEI_E = PE2_E$

$NEI_E (PM_{10}) = 103 \text{ lb/year}$

The NEI for this project will be less than the federal Major Modification threshold of 30,000 lb/year for PM_{10} . Therefore, this project does qualify for a "Less-Than-Significant Emissions Increase" exclusion and is thus determined not to be a Federal Major Modification.

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:

- NO₂ (as a primary pollutant)
- SO₂ (as a primary pollutant)
- CO
- PM
- PM₁₀

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. Project Location Relative to Class 1 Area

As demonstrated in the "PSD Major Source Determination" Section above, the facility was determined to be a existing major source for PSD. Because the project is not located within 10 km of a Class 1 area – modeling of the emission increase is not required to determine if the project is subject to the requirements of Rule 2410.

II. Significance of Project Emission Increase Determination

a. Potential to Emit of attainment/unclassified pollutant for New or Modified Emission Units vs PSD Significant Emission Increase Thresholds

As a screening tool, the potential to emit from all new and modified units is compared to the PSD significant emission increase thresholds, and if total potential to emit from all new and modified

units is below this threshold, no further analysis will be needed.

PSD Significant Emission Increase Determination: Potential to Emit (tons/year)					
	NO2	SO2	CO	PM	PM10
Total PE from New and Modified Units	0	0	0	0.05	0.05
PSD Significant Emission Increase Thresholds	40	40	100	25	15
PSD Significant Emission Increase?	N	N	N	N	N

As demonstrated above, because the project has a total potential to emit from all new and modified emission units below the PSD significant emission increase thresholds, this project is not subject to the requirements of Rule 2410 due to a significant emission increase and no further discussion is required.

10. 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 - PE1, where:

- QNEC = Quarterly Net Emissions Change for each emissions unit, lb/qtr.
- PE2 = Post Project Potential to Emit for each emissions unit, lb/qtr.
- PE1 = Pre-Project Potential to Emit for each emissions unit, lb/qtr.

Using the values in Sections VII.C.2 and VII.C.6 in the evaluation above, quarterly PE2 and quarterly PE1 can be calculated as follows:

Quarterly NEC [QNEC] Raw Materials			
	PE2 (lb/qtr)	PE1 (lb/qtr)	QNEC (lb/qtr)
NO _x	0	0	0
SO _x	0	0	0
PM ₁₀	25.75	48.25	(22.5)
CO	0	0	0
VOC	0	0	0

VIII. COMPLIANCE

Rule 2201 New and Modified Stationary Source Review

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 for the following*:

- 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 a Major Modification.

*Except for CO emissions from a new or modified emissions unit at a Stationary Source with an SSPE2 of less than 200,000 pounds per year of CO.

a. New emissions units – PE > 2 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 lb/day purposes is not triggered.

b. Relocation of emissions units – PE > 2 lb/day

As discussed in Section I above, there are no emissions units being relocated from one stationary source to another; therefore BACT is not triggered.

c. Modification of emissions units – AIPE > 2 lb/day

$$\text{AIPE} = \text{PE}_2 - \text{HAPE}$$

Where,

AIPE = Adjusted Increase in Permitted Emissions, (lb/day)

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

HAPE = Historically Adjusted Potential to Emit, (lb/day)

$$\text{HAPE} = \text{PE}_1 \times (\text{EF}_2/\text{EF}_1)$$

Where,

PE₁ = The emissions unit's PE prior to modification or relocation, (lb/day)

EF₂ = The emissions unit's permitted emission factor for the pollutant after modification or relocation. If EF₂ is greater than EF₁ then EF₂/EF₁ shall be set to 1

EF1 = The emissions unit's permitted emission factor for the pollutant before the modification or relocation

$$AIPE = PE2 - (PE1 * (EF2 / EF1))$$

Since PE2 < PE1 (project resulted in a decrease in emissions), and there is no change in emission factors, AIPE = 0 and therefore BACT is not triggered.

d. SB 288/Federal Major Modification

As discussed in Section VII.C.7 and VII.C.8 above, this project does not constitute a SB 288 and/or Federal Major Modification; therefore BACT is not triggered.

B. Offsets

1. Offset Applicability

Pursuant to Rule 2201, offset requirements shall be triggered on a pollutant by pollutant basis and shall be required if the Post Project Stationary Source Potential to Emit (SSPE2) equals to or exceeds the offset threshold levels in Table 4-1 of Rule 2201.

The following table compares the post-project facility-wide annual emissions in order to determine if offsets will be required for this project.

Offset Applicability (lb/year)					
	NO _x	SO _x	PM ₁₀	CO	VOC
Post Project SSPE (SSPE2)	> 20,000	> 140,000	> 140,000	> 200,000	> 20,000
Offset Threshold	20,000	54,750	29,200	200,000	20,000
Offsets Triggered?	Yes	Yes	Yes	Yes	Yes

2. Quantity of Offsets Required

PM₁₀ is the only pollutant of concern in this project. Therefore, calculations for only PM₁₀ emissions are required.

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

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

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 Rule 2201

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
- Any Clean Emissions Unit, located at a Major Source

otherwise,

BE = Historic Actual Emissions (HAE)

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

$$\text{Offsets Required (lb/year)} = (\Sigma[\text{PE}_2 - \text{BE}] + \text{ICCE}) \times \text{DOR}$$

$$\text{PE}_{2\text{Existing Equipment}} = 103 \text{ lb-PM}_{10}/\text{year}$$

$$\text{BE}_{\text{Existing Equipment}} = 193 \text{ lb-PM}_{10}/\text{year}$$

$$\text{ICCE} = 0 \text{ lb/year}$$

$$\begin{aligned} \text{Offsets Required (lb/year)} &= ([103-193] + 0) \times \text{DOR} \\ &= -90 \text{ lb PM}_{10}/\text{year} \times \text{DOR} \rightarrow 0^* \text{ lb PM}_{10}/\text{year} \end{aligned}$$

As demonstrated in the calculation above, the amount of offsets will be zero. Therefore, offsets will not be required for this project.

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 SSIPE of greater than 20,000 lb/year for any pollutant.
- e. Any project which results in a Title V significant permit modification

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 Sections 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 following table compares the SSPE1 with the SSPE2 in order to determine if any offset thresholds have been surpassed with this project.

Offset Threshold				
Pollutant	SSPE1 (lb/year)	SSPE2 (lb/year)	Offset Threshold	Public Notice Required?
NO _x	> 20,000	> 20,000	20,000 lb/year	No
SO _x	> 54,750	> 54,750	54,750 lb/year	No
PM ₁₀	> 29,200	> 29,200	29,200 lb/year	No
CO	> 200,000	> 200,000	200,000 lb/year	No
VOC	> 20,000	> 20,000	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.

Stationary Source Increase in Permitted Emissions [SSIPE] – Public Notice				
Pollutant	Project PE2 (lb/year)	Project PE1 (lb/year)	SSIPE	Public Notice Required?
NO _x	0	0	0	No
SO _x	0	0	0	No
PM ₁₀	103	193	-90	No
CO	0	0	0	No
VOC	0	0	0	No

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

e. Title V Significant Permit Modification

As shown in the Discussion of Rule 2520 below, this project is not a Title V significant modification. Therefore, public noticing for Title V significant modifications is not required.

2. Public Notice Action

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

D. Daily Emission Limits (DELs)

Daily Emissions Limitations (DELs) and other enforceable conditions are required by Rule 2201 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. The DEL must be contained in the latest ATC permit and contained in or enforced by the latest PTO permit and enforceable, in a practicable manner, on a daily basis. DELs are also required to enforce the applicability of BACT.

Proposed Rule 2201 (DEL) Condition:

- PM10 emissions from the dust collectors shall not exceed 0.0001 gr/scf. [District Rule 2201]
- PM10 emissions from the Torit pulse jet cartridge (16PJD6) and Torit bin vent filter (TD 486) dust collectors shall not exceed 0.001 gr/scf. [District Rule 2201]

E. Compliance Assurance

The following measures shall be taken to ensure continued compliance with District Rules:

1. Source Testing

As stated in District Policy APR 1705, non-combustion equipment served by a baghouse with expected PM₁₀ emissions of 30 pounds per day or greater must be tested upon initial start-up. Units with PM₁₀ emissions in excess of 70 pounds per day should also be tested on annual basis.

As shown in the calculation section above, all equipment have PM₁₀ emissions below the above levels. Therefore, pursuant to District Policy APR 1705, source testing is not required to demonstrate compliance with Rule 2201.

2. Monitoring

No monitoring is required to demonstrate compliance with Rule 2201.

3. Recordkeeping

Recordkeeping is required to demonstrate compliance with the offset, public notification and daily emission limit requirements of Rule 2201. The following conditions will be listed on the permit to ensure compliance:

- Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2]

4. Reporting

No reporting is required to demonstrate compliance with Rule 2201.

Rule 2520 Federally Mandated Operating Permit

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 permit upon submittal of the Title V administrative amendment application.

Rule 4001 New Source Performance Standards

This rule incorporates NSPS from Part 60, Chapter 1, Title 40, Code of Federal Regulations (CFR); and applies to all new sources of air pollution and modifications of existing sources of air pollution listed in 40 CFR Part 60. However, no subparts of 40 CFR Part 60 apply to the equipment in this project.

Rule 4002 National Emission Standards for Hazardous Air Pollutants

This rule incorporates NESHAPs from Part 61, Chapter I, Subchapter C, Title 40, CFR and the NESHAPs from Part 63, Chapter I, Subchapter C, Title 40, CFR; and applies to all sources of hazardous air pollution listed in 40 CFR Part 61 or 40 CFR Part 63. However, no subparts of 40 CFR Part 61 or 40 CFR Part 63 apply to the equipment in this project.

Rule 4101 Visible Emissions

Rule 4101 states that 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.

For operation served by a dust collector, visible emissions shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour.

A permit condition will be listed on permit as follows:

- Visible emissions from each baghouse shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201]

Rule 4102 Nuisance

Rule 4102 prohibits discharge of air contaminants which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected as a result of these operations, provided the equipment is well maintained. Therefore, compliance with this rule is expected.

California Health & Safety Code 41700 (Health Risk Assessment)

District Policy APR 1905 – Risk Management Policy for Permitting New and Modified Sources specifies that for an increase in emissions associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite.

As demonstrated above, there are no increases in emissions associated with this project, therefore a health risk assessment is not necessary and no further risk analysis is required.

Rule 4201 Particulate Matter Concentration

Section 3.1 prohibits discharge of dust, fumes, or total particulate matter into the atmosphere from any single source operation in excess of 0.1 grain per dry standard cubic foot.

Particulate matter (PM) emissions are not expected to exceed 0.1 grains/dscf. Therefore, compliance with District Rule 4201 requirements is expected and a permit condition will be listed on the permits as follows:

- Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]

Rule 4202 Particulate Matter – Emission Rate

This rule limits the allowable PM emission rate based on the equipment process weight rate. Section 3.1 defines the process weight as “the total weight of all materials introduced into any specific process, which process may cause any discharge into the atmosphere.”

Per section 4.1, particulate matter (PM) emissions from any source operation shall not exceed the allowable hourly emission rate (E) as calculated using the following applicable formulas:

$$E = 3.59 P^{0.62} \text{ (when, } P = \text{ process weight rate } \leq 30 \text{ tons/hr)}$$
$$E = 17.31 P^{0.16} \text{ (when, } P = \text{ process weight rate } > 30 \text{ tons/hr)}$$

The following existing permit condition ensures continued compliance with the requirements of this rule:

- Particulate matter emissions from each source operation shall not exceed the maximum allowable emission rate (lb/hr) as determined using the following formula: $E = 3.59 * P^{0.62}$, where E equals the maximum allowable emission rate (lb/hr) and P equals the process weight rate (tons/hr) and is less than or equal to 30 tons/hr. [District Rule 4202, 4.0]

California Health & Safety Code 42301.6 (School Notice)

The District has verified that this site is not located within 1,000 feet of a school. Therefore, pursuant to California Health and Safety Code 42301.6, 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 units 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 Authority to Construct C-801-5-11 subject to the permit conditions on the draft Authority to Construct shown in Attachment D.

X. BILLING INFORMATION

Annual Permit Fees			
Permit Number	Fee Schedule	Fee Description	Annual Fee
C-801-5-11	3020-05-F	544,349 gallons	\$301.00

XI. ATTACHMENTS:

- Attachment A: Current Permit to Operate
- Attachment B: Compliance Certification
- Attachment C: Emissions Profile
- Attachment D: Draft Authority to Construct

ATTACHMENT A

Current Permit to Operate

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-801-5-6

EXPIRATION DATE: 01/31/2015

EQUIPMENT DESCRIPTION:

TEN 544,349 GALLON TOTAL CAPACITY RAW MATERIAL STORAGE BINS SERVED BY SIX DONALDSON TORIT (TD 486) AND TWO DONALDSON TORIT POWER CORE (CPC-3) DUST COLLECTORS, ONE BATCH WEIGH SCALE, ONE CULLET WEIGHT SCALE, AND ONE ENCLOSED CONVEYOR ALL SERVED BY A DONALDSON TORIT MODEL #TD-486 PULSE JET CARTRIDGE BAGHOUSE FED FROM THREE STORAGE BINS WITH FLEX KLEEN BIN VENTS AND ONE STORAGE BIN WITH TORIT BIN VENT, AND DONALDSON TORIT MODEL #16PJD6 BAGHOUSE SERVING SILO #3 (PELLETIZED ESP DUST)

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 Rule 4102]
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. Visible emissions from each baghouse shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Each baghouse shall be maintained and operated according to manufacturer's specifications. [District NSR Rule] Federally Enforceable Through Title V Permit
5. The baghouses cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Material removed from each baghouse shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Replacement bags numbering at least 10% of the total number of bags in each baghouse shall be maintained on the premises. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Each baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District NSR Rule] Federally Enforceable Through Title V Permit
9. The baghouses shall operate at all times with a minimum differential pressure of 1 inches water column and a maximum differential pressure of 6 inches water column. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Differential operating pressure for each baghouse shall be monitored and recorded on each day that the baghouse operates. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Records of all maintenance of each baghouse, including all change outs of filter media, shall be maintained. [District NSR Rule] Federally Enforceable Through Title V Permit
12. PM10 emissions from the dust collectors shall not exceed 0.0001 gr/scf. [District NSR Rule] Federally Enforceable Through Title V Permit
13. PM10 emissions from the Torit pulse jet cartridge (16PJD6) and Torit bin vent filter (TD 486) dust collectors shall not exceed 0.001 gr/scf. [District NSR Rule] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

14. Dust collector filters shall be inspected weekly while in operation for evidence of particulate matter breakthrough and replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
15. Dust collector filters shall be inspected monthly while not in operation for tears, scuffs, abrasions or holes which might interfere with the PM collection efficiency and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
16. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
17. Records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District NSR Rule] Federally Enforceable Through Title V Permit
18. Compliance with the conditions in the permit requirements for this unit shall be deemed compliant with District Rules 4201 (as amended December 17 1992) and 4202 (as amended December 17, 1992); and Madera County Rule 402. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
19. Particulate matter emissions from each source operation shall not exceed the maximum allowable emission rate (lb/hr) as determined using the following formula: $E = 3.59 * P^{0.62}$, where E equals the maximum allowable emission rate (lb/hr) and P equals the process weight rate (tons/hr) and is less than or equal to 30 tons/hr. [District Rule 4202, 4.0] Federally Enforceable Through Title V Permit
20. Visible emissions from each baghouse shall be inspected quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

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

ATTACHMENT B

Compliance Certification

**San Joaquin Valley
Unified Air Pollution Control District**

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: Ardagh Glass, Inc.	FACILITY ID: C- 801
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: Saint-Gobain Containers, Inc.	
3. Agent to the Owner: n/a	

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:



Signature of Responsible Official

07/15/14

Date

Mirko Muller

Name of Responsible Official (please print)

Plant Manager

Title of Responsible Official (please print)

ATTACHMENT C
Emissions Profile

Permit #: C-801-5-11	Last Updated
Facility: ARDAGH GLASS INC	10/30/2014 AIYABEIJ

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	103.0	0.0	0.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.3	0.0	0.0
Quarterly Net Emissions Change (lb/Qtr)					
Q1:	0.0	0.0	-22.0	0.0	0.0
Q2:	0.0	0.0	-22.0	0.0	0.0
Q3:	0.0	0.0	-23.0	0.0	0.0
Q4:	0.0	0.0	-23.0	0.0	0.0
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

ATTACHMENT D

Draft Authority to Construct

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: C-801-5-11

LEGAL OWNER OR OPERATOR: ARDAGH GLASS INC
MAILING ADDRESS: 24441 AVENUE 12
MADERA, CA 93637-9384

LOCATION: 24441 AVENUE 12 & ROAD 24 1/2
MADERA, CA 93637

EQUIPMENT DESCRIPTION:

MODIFICATION OF TEN 544,349 GALLON TOTAL CAPACITY RAW MATERIAL STORAGE BINS SERVED BY SIX DONALDSON TORIT (TD 486) AND TWO DONALDSON TORIT POWER CORE (CPC-3) DUST COLLECTORS, ONE BATCH WEIGH SCALE, ONE CULLET WEIGHT SCALE, AND ONE ENCLOSED CONVEYOR ALL SERVED BY A DONALDSON TORIT MODEL #TD-486 PULSE JET CARTRIDGE BAGHOUSE FED FROM THREE STORAGE BINS WITH FLEX KLEEN BIN VENTS AND ONE STORAGE BIN WITH TORIT BIN VENT, AND DONALDSON TORIT MODEL #16PJD6 BAGHOUSE SERVING SILO #3 (PELLETIZED ESP DUST); REMOVE FOUR STORAGE BINS AND ASSOCIATED BIN VENT FILTERS

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. 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 Rule 4102]
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. Visible emissions from each baghouse shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [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

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Arnaud Marjollet, Director of Permit Services
C-801-5-11 : Nov 7 2014 2:09PM -- AYABEU : Joint Inspection NOT Required

6. Each baghouse shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The baghouses cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Material removed from each baghouse shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Replacement bags numbering at least 10% of the total number of bags in each baghouse shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Each baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The baghouses shall operate at all times with a minimum differential pressure of 1 inches water column and a maximum differential pressure of 6 inches water column. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Differential operating pressure for each baghouse shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Records of all maintenance of each baghouse, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
14. PM10 emissions from the dust collectors shall not exceed 0.0001 gr/scf. [District Rule 2201] Federally Enforceable Through Title V Permit
15. PM10 emissions from the Torit pulse jet cartridge (16PJD6) and Torit bin vent filter (TD 486) dust collectors shall not exceed 0.001 gr/scf. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Dust collector filters shall be inspected weekly while in operation for evidence of particulate matter breakthrough and replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
17. Dust collector filters shall be inspected monthly while not in operation for tears, scuffs, abrasions or holes which might interfere with the PM collection efficiency and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
18. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
19. Records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Compliance with the conditions in the permit requirements for this unit shall be deemed compliant with District Rules 4201 (as amended December 17 1992) and 4202 (as amended December 17, 1992); and Madera County Rule 402. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
21. Particulate matter emissions from each source operation shall not exceed the maximum allowable emission rate (lb/hr) as determined using the following formula: $E = 3.59 * P^{0.62}$, where E equals the maximum allowable emission rate (lb/hr) and P equals the process weight rate (tons/hr) and is less than or equal to 30 tons/hr. [District Rule 4202, 4.0] Federally Enforceable Through Title V Permit
22. Visible emissions from each baghouse shall be inspected quarterly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit

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