



**San Joaquin Valley**  
AIR POLLUTION CONTROL DISTRICT



**HEALTHY AIR LIVING™**

DEC 11 2009

Phillip Newell  
Guardian Industries Corp.  
11535 E Mountain View Ave  
Kingsburg, CA 93631-9233

**Re: Notice of Minor Title V Permit Modification  
District Facility # C-598  
Project # C-1093632**

Dear Mr. Newell:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued Authority to Construct C-598-10-0 into the Title V operating permit. This Authority to Construct authorizes the installation of a 168 bhp diesel-fired emergency standby internal combustion (IC) engine powering a water pump.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct C-598-10-0, emission increases, and application. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Jim Swaney at (559) 230-5900.

Sincerely,

David Warner  
Director of Permit Services

Enclosures

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

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**Northern Region**  
4800 Enterprise Way  
Modesto, CA 95356-8718  
Tel: (209) 557-6400 FAX: (209) 557-6475

**Central Region (Main Office)**  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
Tel: (559) 230-6000 FAX: (559) 230-6061

**Southern Region**  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
Tel: 661-392-5500 FAX: 661-392-5585



DEC 11 2009

Gerardo C. Rios, Chief  
Permits Office  
Air Division  
U.S. EPA - Region IX  
75 Hawthorne St  
San Francisco, CA 94105

Re: **Notice of Minor Title V Permit Modification**  
**District Facility # C-598**  
**Project # C-1093632**

Dear Mr. Rios:

Enclosed for you to review is an application for minor Title V permit modification for the facility identified above. Guardian Industries Corp. is proposing a Title V minor permit modification to incorporate the recently issued Authority to Construct C-598-10-0 into the Title V operating permit. This Authority to Construct authorizes the installation of a 168 bhp diesel-fired emergency standby internal combustion (IC) engine powering a water pump.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authority to Construct C-598-10-0, emission increases, and application. Please submit your written comments on this project within the 45-day comment period that begins on the date you receive this letter.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Jim Swaney at (559) 230-5900.

Sincerely,

David Warner  
Director of Permit Services

Enclosures

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

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# TITLE V APPLICATION REVIEW

Minor Modification  
Project #: C-1093632

Engineer: Sajjad Ahmad  
Date: December 7, 2009

Facility Number: C-598  
Facility Name: Guardian Industries Corp.  
Mailing Address: 11535 E Mountain View Ave  
Kingsburg, CA 93631-9211

Contact Name: Phillip Newell  
Phone: (559) 896-6400

Responsible Official: Ashley Kirkland  
Title: Plant Manager

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## I. PROPOSAL

Guardian Industries Corp. is proposing a Title V minor permit modification to incorporate the recently issued Authority to Construct (ATC) C-598-10-0 into the Title V operating permit. This ATC authorizes the installation of a 168 bhp diesel-fired emergency standby internal combustion (IC) engine powering a water pump.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

## II. FACILITY LOCATION

The project is located at 11535 E Mountain View Avenue in Kingsburg, California.

## III. EQUIPMENT DESCRIPTION

**C-598-10-1: 168 BHP CATERPILLAR MODEL C6.6 ACERT TIER 3  
CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE  
POWERING A WATER PUMP**

#### **IV. SCOPE OF EPA AND PUBLIC REVIEW**

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

#### **V. APPLICABLE REQUIREMENTS**

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

#### **VI. DESCRIPTION OF PROPOSED MODIFICATIONS**

Guardian Industries Corp is proposing to incorporate the recently issued ATC C-598-10-0 into the Title V operating permit. This ATC authorizes the installation of a 168 bhp diesel-fired emergency standby IC engine powering a water pump.

##### Conditions deleted from the ATC:

Condition 1 on the ATC will not be included on the proposed PTO, since the requirement has been satisfied with the submittal of this Title V Minor Modification application.

Condition 2 on the ATC was not included on the proposed PTO, since the condition is redundant with condition # 41 on the facility wide permit to operate C-598-0-3.

Condition 3 on the ATC was not included on the proposed PTO, since the condition is redundant with condition # 22 on the facility wide permit to operate C-598-0-3.

#### **VII. COMPLIANCE**

In accordance with Rule 2520, 3.20, 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.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

## VIII. ATTACHMENTS

- A. Proposed Modified Title V Operating Permit No. C-598-10-1
- B. Authority to Construct No. C-598-10-0
- C. Emissions Increases
- D. Application

# ATTACHMENT A

Proposed Modified Title V Operating Permit No.  
(C-598-10-1)

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-598-10-1

**EXPIRATION DATE:** 01/31/2008

**EQUIPMENT DESCRIPTION:**

168 BHP CATERPILLAR MODEL C6.6 ACERT TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING A WATER PUMP

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702] Federally Enforceable Through Title V Permit
3. {1898} The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
4. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
5. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801 and 17 CCR 93115] Federally Enforceable Through Title V Permit
6. Emissions from this IC engine shall not exceed any of the following limits: 2.51 g-NOx/bhp-hr, 1.34 g-CO/bhp-hr, or 0.18 g-VOC/bhp-hr. [District Rule 2201 and 13 CCR 2423 and 17 CCR 93115] Federally Enforceable Through Title V Permit
7. Emissions from this IC engine shall not exceed 0.112 g-PM10/bhp-hr based on USEPA certification using ISO 8178 test procedure. [District Rules 2201 and 4102 and 13 CCR 2423 and 17 CCR 93115] Federally Enforceable Through Title V Permit
8. This engine shall be operated only for testing and maintenance of the engine, required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 50 hours per calendar year. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
9. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702] Federally Enforceable Through Title V Permit
10. This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rule 4702] Federally Enforceable Through Title V Permit
11. During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702] 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.

12. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.) and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
13. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit

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

DRAFT

# ATTACHMENT B

Authority to Construct No.  
(C-598-10-0)



**San Joaquin Valley**  
**AIR POLLUTION CONTROL DISTRICT**

**AUTHORITY TO CONSTRUCT**

**PERMIT NO:** C-598-10-0

**ISSUANCE DATE:** 05/22/2008

**LEGAL OWNER OR OPERATOR:** GUARDIAN INDUSTRIES CORP  
**MAILING ADDRESS:** 11535 E MOUNTAIN VIEW AVE  
 KINGSBURG, CA 93631-9211

**LOCATION:** 11535 E MOUNTAIN VIEW AVE  
 KINGSBURG, CA 93631

**EQUIPMENT DESCRIPTION:**  
 168 BHP CATERPILLAR MODEL C6.6 ACERT TIER 3 CERTIFIED DIESEL-FIRED EMERGENCY STANDBY IC ENGINE  
 POWERING A WATER PUMP

**CONDITIONS**

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. 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
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702] Federally Enforceable Through Title V Permit
6. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap, roof overhang, or any other obstruction. [District Rule 4102]
7. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
8. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules 2201 and 4801 and 17 CCR 93115] 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-598-10-0: May 22 2008 2:43PM - BROWND : Joint Inspection NOT Required

9. Emissions from this IC engine shall not exceed any of the following limits: 2.51 g-NO<sub>x</sub>/bhp-hr, 1.34 g-CO/bhp-hr, or 0.18 g-VOC/bhp-hr. [District Rule 2201 and 13 CCR 2423 and 17 CCR 93115] Federally Enforceable Through Title V Permit
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15. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.) and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
16. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit

# ATTACHMENT C

Emissions Increases

	SSIPE (lb/yr)				
	NOx	SOx	PM10	CO	VOC
C-598-10-0	46	0	2	25	3
<b>TOTAL</b>	<b>2,592</b>	<b>1,208</b>	<b>3,705</b>	<b>0</b>	<b>913</b>

# ATTACHMENT D

Application

# San Joaquin Valley Air Pollution Control District

www.valleyair.org

Received

NOV 18 2009

Permits Srvc  
SJVAPCD

## Permit Application For:

ADMINISTRATIVE AMENDMENT     MINOR MODIFICATION     SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: Guardian Industries Corp	
2. MAILING ADDRESS:  STREET/P.O. BOX: <u>11535 East Mountain View Ave</u>  CITY: <u>Kingsburg</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>93631-9233</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:  STREET: <u>11535 East Mountain View Ave</u> CITY: <u>Kingsburg</u>  _____ ¼ SECTION _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE: June 2008
4. GENERAL NATURE OF BUSINESS: Float Glass Manufacturing	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary)  Permit No: C-598-10-0  168 BHP Caterpillar Model C 6.6 ACERT Tier 3 Certified Diesel fired emergency standby IC engine powering a water pump.	
6. TYPE OR PRINT NAME OF APPLICANT: Phillip Newell	TITLE OF APPLICANT: Environmental Engineer
7. SIGNATURE OF APPLICANT:  DATE: 11-16-09	PHONE: (559) 896-6400 FAX: (559) 896-2884 EMAIL: pnewell@guardian.com

**For APCD Use Only:**

DATE STAMP	FILING FEE RECEIVED: \$  CHECK#: _____
	DATE PAID: _____

PROJECT NO: ~~C-1095198~~

FACILITY ID: C-598

C-1093632

Received

NOV 18 2009

Permits Srvc  
SJVAPCD

# 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: Guardian Industries Corp.	FACILITY ID: C - 598
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:	
3. Agent to the Owner: Ashley Kirkland	

### 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:

*Ashley Kirkland*  
Signature of Responsible Official

11/16/09  
Date

Ashley Kirkland  
Name of Responsible Official (please print)

Plant Manager  
Title of Responsible Official (please print)