

**YOLO-SOLANO AIR QUALITY MANAGEMENT DISTRICT**  
1947 Galileo Court, Suite 103, Davis, CA 95618  
(530)757-3650

**TITLE V PERMIT STATEMENT OF BASIS**

PERMIT NUMBER: F-00502-8

ENGINEER: Courtney Graham

DATE: December 21, 2010

**Facility Name:** Insulfoam, LLC  
**Mailing Address:** 6004 N. Westgate Blvd., Ste. 120  
Tacoma, WA 98406

**Location:** 1155 Business Park Drive  
Dixon, CA 95620

**Responsible Official:** James R. Johnson  
**Title:** Vice President

**Application Contact:** Shawn Osler  
**Phone:** 253-779-9200

**I. FACILITY DESCRIPTION**

Insulfoam, LLC (“Insulfoam”) operates the expanded polystyrene (EPS) manufacturing facility located at 1155 Business Park Dr. in Dixon, CA. The finished EPS is used to make products used mostly in the building industry.

The EPS manufacturing process consists of placing raw resin material into the batch pre-expanders, where steam is injected and mechanical agitation causes expansion of the resin. After pre-expansion, this “pre-puff” resin is transferred to aging bags for storage. During aging, the moisture content is lowered and the resin continues to expand. After aging, recycled material is mixed with the raw material and the mixture is sent to one of the block molds where the material is fused using steam, pressure, and vacuum to produce foam billets, or blocks. The blocks are then either sold whole, or cut into various thicknesses for different products. Some foam sheets have thin sheets of material added to both sides for use as insulation.

Other thicker sheets will be used in a new process in which structural insulated panels (“panels”) are made and used as walls in new construction. Panels are made by attaching a sheet of oriented strand board (OSB) to each side of an EPS slab using glue. After being glued, the slabs are pressed, cured, cut to shape, caulked, and sealed.

## II. PROPOSED REVISIONS

The applicant is proposing to modify the current Title V Permit by proposing to permit the new process described above as the panel manufacturing.

This addendum to the Title V Statement of Basis reflects only the Title V Permit modifications proposed by Authority to Construct (ATC) application C-10-65. Emissions units that are not affected by the proposed changes were evaluated in the original (or any subsequent) statement of basis and will not be included here.

## III. SIGNIFICANT EMISSIONS UNIT INFORMATION

Each of the sources has been constructed pursuant to issuance of an ATC in accordance with District Rules 3.1 (Exemptions) and 3.4 (New Source Review). Upon Insulfoam complying with the requirements of ATC C-10-65, the construction permit will be implemented into Permit to Operate (PTO) P-83-10.

**Identification Number: P-83-10**

**Equipment Description:** Roll Press #1: One roll coater, 3 hp, with a 9' x 32' panel press, 16 hp; Roll Press #2: One Roll Coater, 3 hp, with a 8' x 24' panel press, 8 hp; one slabber, 3 hp; one Hendrick Saw, 8 hp; one Spline Saw, 19 hp; one Octopus, 2 hp; and one Router, 44 hp.

**Control Equipment:** One Donaldson Torit Cyclone, 3000 cfm, serving the Hendrick saw; One Donaldson Torit cyclone, 8250 cfm, serving the fabrication cells, router, and spline saw; one Donaldson Torit baghouse, model DFT3-24, 12000 cfm, serving both cyclones.

## IV. TITLE V APPLICABILITY

The total potential to emit (PTE) for all of the Insulfoam equipment permitted at this location exceeds the VOC major source threshold of 25 tons per year. Therefore, Insulfoam is subject to the requirements of District Rule 3.8 (Federal Operating Permits). The facility's emission totals are listed below in Table 1 on a per pollutant basis

**Table 1 - Total Potential to Emit for Criteria Pollutants**

Criteria Pollutant Emissions (tons per year)					
Emission Unit Name	VOC	CO	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>
P-59-93(t)	0.10	18.89	2.02	0.02	0.48
P-82-96(t)	0.06	8.09	1.00	0.01	0.18
P-19-79(a6)	175.00	1.47	1.75	0.01	0.13
P-83-10	0.08	-	-	-	0.18
Total	175.24	28.45	4.77	0.04	0.97

**V. APPLICABLE FEDERAL REQUIREMENTS**

**RULE 2.3 Ringelmann Chart**

**Rule Description**

This rule specifies the allowable opacity limit for sources in the District.

**Compliance Status**

The rule applies to any fugitive emissions associated with the process. The version of the rule used in this evaluation is the rule adopted on October 1, 1971, and is part of the California State Implementation Plan (SIP). The source is currently in compliance with the requirements of the rule.

**Requirement**

The Permit Holder shall not discharge into the atmosphere from any single source of emission whatsoever, any air contaminant for a period or periods aggregating more than three (3) minutes in any one (1) hour which is:

- a. As dark or darker in shade as that designated as No. 2 on the Ringelmann Chart as published by the United States Bureau of Mines; or
  - b. Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subsection a. of this condition.
- [District Rule 2.3]

**Streamlined Demonstration**

The requirements of the rule can be streamlined by a condition required by District Rule 3.1. The streamlining demonstration is shown below:

**Streamlined Condition:** The Permit Holder shall not discharge into the atmosphere from any single source of emissions whatsoever, any air contaminant for a period or periods aggregating more than three (3) minutes in any one (1) hour which is:

- a. As dark or darker in shade than No. 1 on the Ringelmann Chart; or
- b. Greater than 20% opacity. [District Rule 3.1]

## **RULE 2.5 Nuisance**

### **Rule Description**

This rule requires that sources are not a public nuisance.

### **Compliance Status**

The rule applies to the operation. The version of the rule used in this evaluation is the rule adopted on October 1, 1971, and is part of the California SIP. The source is currently in compliance with the rule.

### **Permit Condition**

The Permit Holder shall not discharge from any source whatsoever such quantities of air contaminants or other material 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 persons or the public or which cause to have a natural tendency to cause injury or damage to business or property. [District Rule 2.5]

It should be noted that this permit condition is Federally enforceable because it derives from District Rule 2.5 (Nuisance) that is currently part of the California SIP. The District is taking steps to remove Rule 2.5 from the SIP. Once the U.S. EPA has taken final action to remove District Rule 2.5 from the SIP, this permit condition will become state-enforceable only.

## **RULE 2.11 Particulate Matter**

### **Rule Description**

This rule specifies the allowable particulate matter (PM) emission rate at standard conditions. For the purposes of this evaluation, the PM emissions are considered to be 100% PM<sub>10</sub> (PM with an aerodynamic diameter of 10 microns or less). This rule was updated 1/13/10, however the rule has not yet been

approved as part of the SIP, therefore the previous (SIP-approved) version was evaluated here.

### **Compliance Status**

This rule applies to P-83-10. The source is in compliance with the rule.

### **Requirement**

The Permit Holder shall not release or discharge into the atmosphere from any source, particulate matter in excess of 0.3 grains per cubic foot of exhaust volume as calculated to standard conditions.

### **Streamlined Demonstration**

The PM emitted by the manufacturing process is due to the wood cutting during the finishing of the product. This rule has a standard that relates to exhaust flow (in standard cubic feet) and the only release point covered by this permit which would be subject to the rule is the baghouse exhaust stack.

The requirements of the rule can be streamlined by conditions required by District Rule 3.4 (New Source Review). The streamlining demonstration is shown below:

The District Rule 3.4 requirement in P-83-10 is 1.0 lb/day PM10. The corresponding emission concentration is calculated below using the 12,000 cfm rating of the baghouse:

$$=1.0 \text{ lb PM10/day} * 7,000 \text{ grains/lb} * 1 \text{ day/24 hr} * 1 \text{ min/12,000 cubic feet} * 1 \text{ hour/60 min} = 0.0004 \text{ gr/dscf}$$

**Streamlined Condition:** PM10 emissions from the process shall not exceed 1.0 lb/day, 89 lb/1<sup>st</sup> calendar quarter, 90 lb/2<sup>nd</sup> calendar quarter, 91 lb/3<sup>rd</sup> calendar quarter, 91 lb/4<sup>th</sup> calendar quarter, and 0.18 tons/year. [District Rules 2.11, 2.19, and 3.4/C-10-65]

### **RULE 2.13 Organic Solvents**

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#### **Rule Description**

The rule limits emissions of organic solvents into the atmosphere.

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#### **Compliance Status**

This rule does not apply to P-83-10. The process is exempt per section 110.2 of the rule. The process is subject to Rule 2.31- Surface Preparation and Clean up.

### **RULE 2.17 Circumvention**

#### **Rule Description**

This rule prevents sources from concealing emissions to the atmosphere.

#### **Compliance Status**

The rule is applicable to all emission units at the facility. The source is currently in compliance with the rule.

#### **Permit Condition**

The Permit Holder shall not build, erect, install or use any article, machine, equipment, or other contrivance, the use of which, without resulting in a reduction in the total release of air contaminants to the atmosphere, reduces or conceals an emission which would otherwise constitute a violation of Division 26, Part 3 and Part 4 of the Health and Safety Code of the State of California (H&SC) or District Rules or Regulations. [District Rule 2.17]

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### **RULE 2.19 Particulate Matter Process Emission Rate**

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#### **Rule Description**

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This rule limits the pound per hour particulate matter emission rate based on the amount of material processed.

#### **Compliance Status**

The rule applies to panel manufacturing process (P-83-10). The version of the rule used in this evaluation is the rule adopted on October 1, 1971, and is part of the SIP. The source is currently in compliance with the rule.

#### **Requirement**

The Permit Holder shall not discharge in any one hour from any process unit particulate matter of a weight in excess of the amount shown in the Rule 2.19 Table.

#### **Streamlined Demonstration**

The District Rule 3.4 requirement for P-83-10 is 1.0 lb/day or 0.04 lb/hour PM. The process is limited to approximately 9,494 lb/hour by the panel press line capacities. The Allowable Emission Rate Per Hour shown in the Rule 2.19 Table for process weights of more than 8,500 lb/hr and up to and including 10,000 lb/hr, is 10 lb/hr.

**Streamlined Condition:** PM10 emissions from the manufacturing process (P-83-10) shall not exceed 1.0 lb/day, 89 lb/1<sup>st</sup> calendar quarter, 90 lb/2<sup>nd</sup> calendar quarter, 91 lb/3<sup>rd</sup> calendar quarter, 91 lb/4<sup>th</sup> calendar quarter, and 0.18 tons/year. [District Rules 2.11, 2.19, and 3.4/C-10-65]

## **RULE 2.31 Surface Preparation and Cleanup**

### **Rule Description**

The rule limits VOC emissions from solvents used for surface preparation and cleanup and from the storage and disposal of those solvents.

### **Compliance Status**

This rule was updated 5/14/08, however the rule has not yet been approved as part of the SIP, therefore the previous (SIP-approved) version was evaluated here. Per section 110.4 of the rule, the source must comply with the reporting and record keeping in section 503 of the rule. The source is using solvent to strip cured adhesive only, therefore the remainder of the rule is not applicable. The source is currently in compliance with the rule.

### **Requirement**

Any person claiming exemption pursuant to Section 110, 111, 112 or 113 shall have information available such as product data or material safety data sheets or records that would allow the APCO to verify the eligibility of the exemption.

### **Streamlined Demonstration**

Since the solvent is used to strip cured adhesive only, and that is what needs to be verified, the following condition is appropriate.

**Streamlined Condition:** Organic solvents shall only be used for stripping of cured adhesives. [District rule 2.31, Section 503 and District Rule 3.4/C-10-65]

## **RULE 2.33 Adhesive Operations**

### **Rule Description**

The rule limits VOC emissions from use of adhesives, sealants, adhesive primers, and sealant primers.

### **Compliance Status**

This rule is applicable to the operation. This rule was updated 5/14/08, however the rule has not yet been approved as part of the SIP, therefore the previous (SIP-approved) version was evaluated here. The current sealant proposed is a 5 gr/L product, which complies with the 420 gr/L limit. The adhesive proposed is a zero VOC product, which complies with the 120 gr/L limit. The source is in compliance with the remainder of the rule requirements.

### **Permit Condition**

The maximum VOC content of any sealant (including mastics) used shall not exceed 420 g/L. [District Rule 2.33, Section 301]

The maximum VOC content of any adhesive used shall not exceed 120 g/L. [District Rule 2.33, Section 301]

Adhesives shall be applied using hand application, roll coat, dip coat, or flow coat. [District Rule 2.33, Section 302]

All VOC-containing materials, whether in its form for intended use or as a waste or used product, including items such as cloth or paper laden with VOC containing materials, shall be stored in non-absorbent, non-leaking containers which shall be kept closed at all times, except when filling or emptying, and disposed of in a manner to prevent evaporation of VOCs into the atmosphere at the facility. [District Rule 2.33, Section 304]

The Permit Holder shall maintain the following records:

- a. an itemized list of each material used, including mix ratio;
  - b. VOC content limit and VOC content of each material, as applied;
  - c. monthly purchase, inventory, and usage records;
  - d. an up to date copy of the material safety data sheet for each material.
- [District Rule 2.33, Section 501]

## **RULE 3.1 General Permit Requirements**

### **Rule Description**

The purpose of this rule is to provide an orderly procedure for the review of new sources of air pollution and of the modification and operation of existing sources through the issuance of permits.

### **Compliance Status**

The version of the rule used in this evaluation was adopted on February 23, 1994 and is part of the current SIP. The source is currently in compliance with the rule.

### **Permit Conditions**

No person shall build, erect, alter, or replace any facility, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants, or the use of which may eliminate or reduce or control the issuance of air contaminants, without first obtaining an authorization to construct from the Air Pollution Control Officer (APCO) as specified in Section 401 of District Rule 3.1. [District Rule 3.1, §301.1]

No person shall operate any facility, article, machine, equipment, or other contrivance, for which an authorization to construct is required by District Rules and Regulations without first obtaining a written permit from the APCO. [District Rule 3.1, §302.1]

No person shall operate any facility, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate or reduce or control the issuance of air contaminants, without obtaining a permit from the APCO or the Hearing Board. [District Rule 3.1, §302.2]

The owner or operator of any facility, article, machine, equipment, or other contrivance for which a permit to operate is in effect shall notify the District office whenever a breakdown, malfunction, or operational upset condition exists which would tend to increase emissions of air pollutants or whenever any operating condition contrary to any provision of the permit to operate exists. Such notice shall be given to the District no later than four hours after occurrence during regular workday hours or no later than two hours of the District workday following an occurrence not during regular District workday hours. The notice shall provide the District information as to causes and corrective action being taken, with a schedule for return to required operating conditions. [District Rule 3.1, §405.3]

The Permit Holder shall not discharge into the atmosphere from any single source of emissions whatsoever, any air contaminant for a period or periods aggregating more than three (3) minutes in any one (1) hour which is:

- a. As dark or darker in shade than No. 1 on the Ringelmann Chart; or
- b. Greater than 20% opacity. [District Rule 3.1/C-10-65]

### **RULE 3.4 New Source Review**

### **Rule Description**

This rule applies to all new stationary sources and emissions units and all modifications to existing stationary sources and emissions units which are subject to Rule 3.1 (General Permit Requirements) and which, after construction or modification, emit or may emit any affected pollutants. This rule shall not apply to prescribed burning of forest, agriculture or range land, road construction or any other non-point source common to timber harvesting or agricultural practices. The purpose of this rule is to provide for the review of new and modified stationary air pollution sources and to provide mechanisms, including emission offsets, by which authorities to construct such sources may be granted without interfering with the attainment or maintenance of ambient air quality standards.

### **Compliance Status**

The version of the rule used in this evaluation was adopted on August 13, 1997 and is part of the current SIP. The source has satisfied the provisions of NSR and the applicable requirements are contained in ATC C-10-65. The NSR requirements are shown below:

### **Permit Conditions**

#### **Permitted Emission Limits:**

The VOC emissions from the panel manufacturing process (P-83-10) shall not exceed 6.2 lb/day, 49 lb/1<sup>st</sup> calendar quarter, 49 lb/2<sup>nd</sup> calendar quarter, 49 lb/3<sup>rd</sup> calendar quarter, 49 lb/4<sup>th</sup> calendar quarter, and 0.08 tons/calendar year. [District Rule 3.4/ C-10-65]

The PM<sub>10</sub> emissions from the SIP manufacturing process (P-83-10) shall not exceed 1.0 lb/day, 89 lb/1<sup>st</sup> calendar quarter, 90 lb/2<sup>nd</sup> calendar quarter, 91 lb/3<sup>rd</sup> calendar quarter, 91 lb/4<sup>th</sup> calendar quarter, and 0.18 tons/calendar year. [District Rule 3.4/ C-10-65]

The Permit Holder shall not discharge into the atmosphere from the baghouse, any air contaminant for a period or periods aggregating more than three (3) minutes in any one (1) hour which is:

- a. As dark or darker in shade than No. 1/4 on the Ringelmann Chart; or
- b. Greater than 5% opacity. [District Rule 3.4/C-10-65]

The Permit Holder shall not release or discharge into the atmosphere, particulate matter in excess of 0.0004 grains per cubic foot of exhaust volume as calculated at standard conditions. [District Rule 3.4/C-10-65]

### **Permitted Process Limits:**

The VOC process limits from the panel manufacturing process (P-83-10) shall not exceed 6.2 lb/day, 49 lb/1<sup>st</sup> calendar quarter, 49 lb/2<sup>nd</sup> calendar quarter, 49 lb/3<sup>rd</sup> calendar quarter, 49 lb/4<sup>th</sup> calendar quarter, and 166 lb/calendar year. [District Rule 3.4/ C-10-65]

The woodworking operating hours for the panek manufacturing process (P-83-10) shall not exceed 24 hours/day, 2,160 hours/1<sup>st</sup> calendar quarter, 2,184 hours/2<sup>nd</sup> calendar quarter, 2,208 hours/3<sup>rd</sup> calendar quarter, 2,208 hours/4<sup>th</sup> calendar quarter, and 8,760 hours/calendar year. [District Rule 3.4/C-10-65]

### **Operational, Monitoring and Testing, and Record Keeping**

All control equipment, including ducts, shall be properly maintained and kept in good operating condition, and shall be operated at all times in conjunction with it's associated process. [District Rule 3.4/C-10-65]

The Permit Holder shall dispose of all material collected in the control equipment in a manner preventing it's entrainment into the atmosphere. [District Rule 3.4/C-10-65]

Organic solvents shall only be used for stripping of cured adhesives. [District Rule 3.4/C-10-65]

The Permit Holder shall maintain records on a monthly basis that include all VOC-containing materials used, the quantity and mix ratio of each material used, and the corresponding VOC emissions, in accordance with a District approved recordkeeping methodology and format. [District Rule 3.4/C-10-65]

The Permit Holder shall maintain a log of the daily operating hours for the woodworking operations. [District Rule 3.4/C-10-65]

All required records shall be retained for a minimum of five (5) years and shall be made available for District inspection upon request. [District Rule 3.4/C-10-65]

## **RULE 3.8 Federal Operating Permits**

### **Rule Description**

This rule implements the requirements of Title V of the Federal CAA as amended in 1990 for permits to operate. Title V provides for the establishment of operating permit programs for sources which emit regulated air pollutants, including attainment and non-attainment pollutants.

### **Compliance Status**

The Rule was originally adopted on January 26, 1994. The most recent revision dates April 11, 2001 and is part of the current SIP. The source is in compliance with the requirements of this rule. The source has proposed to permit a new panel manufacturing line within the existing stationary source. Per the source's request, the ATC was not processed under the Enhanced NSR provisions of District Rule 3.8, and the source has submitted a separate Title V permit application requesting that the federal operating permit be revised and noticed after the issuance of the local construction permit.

Per the requirements of Section 203, the proposed Title V permit amendments are not administrative amendments since the proposed changes are not correcting typographical errors, or correcting administrative changes at the stationary source, or requiring more frequent monitoring or reporting, or implementing a transfer of ownership or operational control, and the modifications are not incorporating a preconstruction review into the Title V permit.

Per the requirements of Section 228, the application will result in a significant modification of the facility's federal operating permit since this evaluation involves the case-by-case determination of the various emission standards contained in the District's Rules and Regulations. As such, copies of the Title V application, Statement of Basis, and proposed Title V permit shall be mailed to EPA and ARB. Per the requirements of Section 409.1, the District's proposed amended Title-V permit will be noticed to the public over a 30-day period (with the notice being published in at least one general circulation newspaper), and will also be noticed to the EPA and ARB over a 45-day period.

Upon implementation of the District ATC into a PTO, the source will be required to submit a written request for District action to amend the Title V operating permit pursuant to District Rule 3.8, Section 404.3. Upon receiving the written request, the District shall incorporate the changes into the Title V permit as an administrative permit amendment pursuant to District Rule 3.8, Section 413.3.

### **Permit Conditions**

#### **Right of Entry:**

The permit shall require that the source allow the entry of the District, ARB, or U.S. EPA officials for the purpose of inspection and sampling, including:

- a. Inspection of the stationary source, including equipment, work practices, operations, and emissions-related activity;
- b. Inspection and duplication of records required by the permit to operate; and

- c. Source sampling or other monitoring activities. [District Rule 3.8, §302.10]

**Compliance with Permit Conditions:**

The Permit Holder shall comply with all Title V permit conditions. [District Rule 3.8, §302.11a]

The permit does not convey property rights or exclusive privilege of any sort. [District Rule 3.8, §302.11b]

Non-compliance with any permit condition is grounds for permit termination, revocation and reissuance, modification, enforcement action, or denial of permit renewal. [District Rule 3.8, §302.11c]

The Permit Holder shall not use the “need to halt or reduce a permitted activity in order to maintain compliance” as a defense for non-compliance with any permit condition. [District Rule 3.8, §302.11d]

A pending permit action or notification of anticipated non-compliance does not stay any permit condition. [District Rule 3.8, §302.11e]

Within a reasonable time period, the Permit Holder shall furnish any information requested by the APCO, in writing, for the purpose of determining:

- a. Compliance with the permit; or
- b. Whether or not cause exists for a permit or enforcement action. [District Rule 3.8, §302.11f]

**Emergency Provisions:**

Within two weeks of an emergency event, the owner or operator shall submit to the District a properly signed contemporaneous log or other relevant evidence demonstrating that:

- a. An emergency occurred;
- b. The Permit Holder can identify the cause(s) of the emergency;
- c. The facility was being properly operated at the time of the emergency;
- d. All steps were taken to minimize the emissions resulting from the emergency; and
- e. Within two working days of the emergency event, the Permit Holder provided the District with a description of the emergency and any mitigating or corrective actions taken.

In any enforcement proceeding, the Permit Holder has the burden of proof for establishing that an emergency occurred. [District Rule 3.8, §302.12]

**Severability:**

If any provision, clause, sentence, paragraph, section or part of these conditions for any reason is judged to be unconstitutional or invalid, such judgement shall not affect or invalidate the remainder of these conditions. [District Rule 3.8, §302.13]

**Compliance Certification:**

The Responsible Official shall submit a compliance certification to the U.S. EPA and the APCO every twelve (12) months unless required more frequently by an applicable requirement. The twelve (12) month period will begin on the date that the Title V permit was originally issued, and will be due within thirty (30) days after the end of the reporting period, unless otherwise approved in writing by the District. All compliance reports and other documents required to be submitted to the District by the responsible official shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. [District Rule 3.8, §302.14(a)]

The compliance certification shall identify the basis for each permit term or condition (e.g., specify the emissions limitation, standard, or work practice) and a means of monitoring compliance with the term or condition consistent with Sections 302.5, 302.6, and 302.7 of Rule 3.8. [District Rule 3.8, §302.14b]

The compliance certification shall include a statement of the compliance status, whether compliance was continuous or intermittent, and method(s) used to determine compliance for the current time period and over the entire reporting period. [District Rule 3.8, §302.14c]

The compliance certification shall include any additional inspection, monitoring, or entry requirement that may be promulgated pursuant to Sections 114(a) and 504(b) of the Federal CAA. [District Rule 3.8, §302.14d]

**Permit Life:**

The Title V permit shall expire five years from the date of issuance. Title V permit expiration terminates the stationary source's right to operate unless a timely and complete Title V permit application for renewal has been submitted. [District Rule 3.8, §302.15]

**Payment of Fees:**

An owner or operator shall pay the appropriate Title V permit fees on schedule. If fees are not paid on schedule, the permit is forfeited. Operation without a permit

subjects the source to potential enforcement action by the District and the U.S. EPA pursuant to Section 502(a) of the CAA. [District Rule 3.8, §302.16]

**Permit Revision Exemption:**

No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes, for changes that are provided for in the permit. [District Rule 3.8, §302.22]

**Application Requirements:**

An owner or operator shall submit a standard District application for renewal of the Title V permit, no earlier than 18 months and no later than six months before the expiration date of the current permit to operate. [District Rule 3.8, §402.2]

An owner or operator shall submit a standard District application for each emissions unit affected by a proposed permit revision that qualifies as a significant Title V permit modification. The application shall be submitted after obtaining any required preconstruction permits. Upon request by the APCO, the owner or operator shall submit copies of the latest preconstruction permit for each affected emissions unit. The emissions unit(s) shall not commence operation until the APCO approves the permit revision. [District Rule 3.8, §402.3]

An owner or operator shall submit a standard District application for each emissions unit affected by the proposed permit revision that qualifies as a minor permit modification. The application shall be submitted after obtaining any required preconstruction permits. The emissions unit(s) shall not commence operation until the APCO approves the permit revision. In the application, the owner or operator shall include the following:

- a. A description of the proposed permit revision, any change in emissions, and additional applicable federal requirements that will apply;
- b. Proposed permit terms and conditions; and
- c. A certification by a responsible official that the permit revision meets criteria for use of minor permit modification procedures and a request that such procedures be used. [District Rule 3.8, §402.4]

**Permit Reopening for Cause:**

Circumstances that are cause for reopening and revision of a permit include, but are not limited to, the following:

- a. The need to correct a material mistake or inaccurate statement;
- b. The need to revise or revoke a permit to operate to assure compliance with applicable federal requirements;

- c. The need to incorporate any new, revised, or additional applicable federal requirements, if the remaining authorized life of the permit is three (3) years or greater, no later than 18 months after the promulgation of such requirement (where less than three (3) years remain in the authorized life of the permit, the APCO shall incorporate the requirements into the permit to operate upon renewal); or
- d. Additional requirements promulgated pursuant to Title IV as they become applicable to any acid rain unit governed by the permit. [District Rule 3.8, §413.1]

**Monitoring, Testing and Analysis:**

Additional monitoring, testing and analysis is covered under the section heading Rule 3.4, New Source Review.

**Recordkeeping:**

The Permit Holder shall record maintenance of all monitoring and support information required by any applicable federal requirement, including:

- a. Date, place, and time of sampling;
- b. Operating conditions at the time of sampling;
- c. Date, place, and method of analysis; and
- d. Results of the analysis. [District Rule 3.8, §302.6a]

The Permit Holder shall retain records of all required monitoring data and support information for a period of at least five years from the date of sample collection, measurement, report, or application. [District Rule 3.8, §302.6b]

**Reporting Requirements:**

Any deviation from permit requirements, including that attributable to upset conditions (as defined in the permit), shall be promptly reported to the APCO. For the purpose of this condition prompt means as soon as reasonably possible, but no later than 10 days after detection.[District Rule 3.8, §302.7a]

A semi-annual monitoring report shall be submitted at least every six (6) consecutive calendar months and shall identify any deviation from permit requirements, including that previously reported to the APCO pursuant to Section 302.7(a) of Rule 3.8. The six (6) month period will begin on the date that the Title V permit was originally issued, and will be due within thirty (30) days after the end of the reporting period, unless otherwise approved in writing by the District. [District 3.8, §302.7(b)]

All reports of deviation from permit requirements shall include the probable cause of the deviation and any preventive or corrective action taken. [District Rule 3.8, §302.7c]

Each monitoring report shall be accompanied by a written statement from the responsible official that certifies the truth, accuracy, and completeness of the report. [District Rule 3.8, §302.7e]