



JUL 01 2013

Mr. Rocco Papietro
Prison Industry Authority - Avenal
#1 Kings Way
Avenal, CA 93204

Re: Notice of Minor Title V Permit Modification
District Facility # C-954
Project # C-1132005

Dear Mr. Papietro:

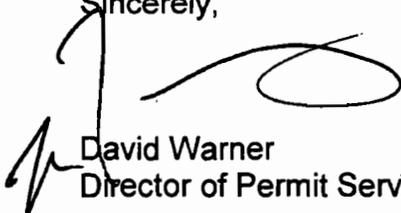
Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued C-954-3-5 into the Title V operating permit. The facility is proposing to modify an existing woodworking operation served by a dust collector to include a CNC router and a vertical panel saw in the operation.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued C-954-3-5, emission increases, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

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,


David Warner
Director of Permit Services

Enclosures

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

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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

TITLE V APPLICATION REVIEW

Minor Modification
Project #: C-1132005

Engineer: Gurpreet Brar
Date: June 25, 2013

Facility Number: C-954
Facility Name: Prison Industry Authority - Avenal
Mailing Address: #1 Kings Way
Avenal, CA 93204

Contact Name: Rocco Papietro
Phone: (559) 386-0587 ext. 6055

Responsible Official: Rocco Papietro
Title: Prison Industry Manager

I. PROPOSAL

Prison Industry Authority - Avenal (PIA - Avenal) is proposing a Title V minor permit modification to incorporate the recently issued Authority to Construct (ATC) C-954-3-5 into the Title V operating permit. Avenal - PIA is proposing to modify an existing woodworking operation served by a dust collector to include a CNC router and a vertical panel saw in the operation.

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 equipment is located at #1 Kings Way in Avenal, CA.

III. EQUIPMENT DESCRIPTION

C-954-3-6: WOOD FURNITURE FACTORY LOCATED IN BLDG #290 WITH WOODWORKING OPERATION CONSISTING OF 4 TABLE SAWS, 1 CHOP SAW, 1 BAND SAW, 2 PANEL SAWS, 1 CNC PANEL SAW, 1 CNC SAW, 5 SANDERS, 2 SHAPERS, 1 CLEANER, 1 PLANER, 1 EDGE BANDER, 4 CNC ROUTERS, 1 PIN ROUTER, 2 DRAWER DOVETAILER AND OTHER RELATED EQUIPMENT, ALL SERVED BY AN R.P. RICHARDS MODEL 12-216-3464 BAGHOUSE DUST COLLECTOR WITH REVERSE PULSED-JET CLEANING SYSTEM

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

Prison Industry Authority - Avenal operates various woodworking equipment. Common woodworking operations include sawing, chipping, shaping, moulding, hogging, lathing, and sanding. The facility is proposing to modify an existing woodworking operation served by a dust collector to include a CNC router and a vertical panel saw in this operation.

C-954-3-6:

Permit condition 1 on the current Permit to Operate C-954-3-5 are represented by permit condition 1 on the proposed Permit to Operate C-954-3-6.

Permit condition 2 on the proposed Permit to Operate C-954-3-6 has been added to ensure compliance with. District Rule 4101 for Visible Emissions.

Permit conditions 2 through 17 on the current Permit to Operate C-954-3-5 are represented by permit conditions 3 through 18 on the proposed Permit to Operate C-954-3-6.

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-954-3-6
- B. Authorities to Construct No. C-954-3-5
- C. Emissions Increases
- D. Previous Title V Operating Permit No. C-954-3-4
- E. Application

ATTACHMENT A

Proposed Modified Title V Operating Permit No.
(C-954-3-6)

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-954-3-6

EXPIRATION DATE: 08/31/2017

EQUIPMENT DESCRIPTION:

WOOD FURNITURE FACTORY LOCATED IN BLDG #290 WITH WOODWORKING OPERATION CONSISTING OF 4 TABLE SAWS, 1 CHOP SAW, 1 BAND SAW, 2 PANEL SAWS, 1 CNC PANEL SAW, 1 CNC SAW, 5 SANDERS, 2 SHAPERS, 1 CLEANER, 1 PLANER, 1 EDGE BANDER, 4 CNC ROUTERS, 1 PIN ROUTER, 2 DRAWER DOVETAILER AND OTHER RELATED EQUIPMENT, ALL SERVED BY AN R.P. RICHARDS MODEL 12-216-3464 BAGHOUSE DUST COLLECTOR WITH REVERSE PULSED-JET CLEANING SYSTEM

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 2201] Federally Enforceable Through Title V Permit
2. 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
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. Visible emissions from the exhaust of the dust collector serving the woodworking operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The PM10 emissions from the dust collector shall not exceed 1.1 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
6. All ducting and control equipment shall be in good working order to prevent fugitive particulate emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
7. All filters shall be properly maintained and must be in place during the woodworking operation(s). [District Rule 2201] Federally Enforceable Through Title V Permit
8. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The 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
10. The baghouse shall operate at all times with a minimum differential pressure of 0.5 inches water column and a maximum differential pressure of 4 inches water column. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Dust collector exhaust fan(s) shall be switched on prior to the start-up of any woodworking equipment. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

13. Replacement bags numbering at least 10% of the total number of bags in the baghouse shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter breakthrough and shall be replaced as needed. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records of dust collector maintenance, inspections, and repairs including all change outs of filter media, 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 2201] Federally Enforceable Through Title V Permit
17. Records of the daily differential operating pressure readings shall be retained on-site. [District Rule 2201] Federally Enforceable Through Title V Permit
18. 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

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

DRAFT

ATTACHMENT B

Authorities to Construct No.
(C-954-3-5)



AUTHORITY TO CONSTRUCT

PERMIT NO: C-954-3-5

ISSUANCE DATE: 09/12/2012

LEGAL OWNER OR OPERATOR: PRISON INDUSTRY AUTHORITY--AVENAL
MAILING ADDRESS: #1 KINGS WAY
AVENAL, CA 93204

LOCATION: 1 KINGS WAY
AVENAL, CA 93204

EQUIPMENT DESCRIPTION:

MODIFICATION OF WOOD FURNITURE FACTORY LOCATED IN BLDG #290 WITH WOODWORKING OPERATION CONSISTING OF 4 TABLE SAWS, 1 CHOP SAW, 1 BAND SAW, 1 PANEL SAW, 1 CNC PANEL SAW, 1 CNC SAW, 5 SANDERS, 2 SHAPERS, 1 CLEANER, 1 PLANER, 1 EDGE BANDER, 3 CNC ROUTERS, 1 PIN ROUTER, 2 DRAWER DOVETAILER AND OTHER RELATED EQUIPMENTS, ALL SERVED BY AN R.P. RICHARDS MODEL 12-216-3464 BAGHOUSE DUST COLLECTOR WITH REVERSE PULSED-JET CLEANING SYSTEM: ADD A CNC ROUTER AND A VERTICAL PANEL SAW

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. 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 2201]
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]
4. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
6. Visible emissions from the exhaust of the dust collector serving the woodworking operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]
7. The PM10 emissions from the dust collector shall not exceed 1.1 lb/day. [District Rule 2201]

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

Martha Keast for

DAVID WARNER, Director of Permit Services

C-954-3-5 : Sep 12 2012 4:11PM - GILLEBR : Joint Inspection NOT Required

8. All ducting and control equipment shall be in good working order to prevent fugitive particulate emissions. [District Rule 2201]
9. All filters shall be properly maintained and must be in place during the woodworking operation(s). [District Rule 2201]
10. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201]
11. The 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]
12. The baghouse shall operate at all times with a minimum differential pressure of 0.5 inches water column and a maximum differential pressure of 4 inches water column. [District Rule 2201]
13. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201]
14. Dust collector exhaust fan(s) shall be switched on prior to the start-up of any woodworking equipment. [District Rule 2201]
15. Replacement bags numbering at least 10% of the total number of bags in the baghouse shall be maintained on the premises. [District Rule 2201]
16. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
17. Dust collector filters shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter breakthrough and shall be replaced as needed. [District Rule 2201]
18. Records of dust collector maintenance, inspections, and repairs including all change outs of filter media, 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 2201]
19. Records of the daily differential operating pressure readings shall be retained on-site. [District Rule 2201]
20. 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]

ATTACHMENT C

Emissions Increases

	SSIPE (lb/yr)				
	NOx	VOC	CO	SOx	PM10
C-954-3-6	0	0	0	0	0
TOTAL	0	0	0	0	0

ATTACHMENT D

Previous Title V Operating Permit No.
(C-954-3-4)

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-954-3-4

EXPIRATION DATE: 08/31/2017

EQUIPMENT DESCRIPTION:

WOOD FURNITURE FACTORY LOCATED IN BLDG #290 WITH WOODWORKING OPERATION CONSISTING OF 4 TABLE SAWS, 1 CHOP SAW, 1 BAND SAW, 1 PANEL SAW, 1 CNC PANEL SAW, 1 CNC SAW, 5 SANDERS, 2 SHAPERS, 1 CLEANER, 1 PLANER, 1 EDGE BANDER, 3 CNC ROUTERS, 1 PIN ROUTER, 2 DRAWER DOVETAILER AND OTHER RELATED EQUIPMENTS, ALL SERVED BY AN R.P. RICHARDS MODEL 12-216-3464 BAGHOUSE DUST COLLECTOR WITH REVERSE PULSED-JET CLEANING SYSTEM

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 2201] Federally Enforceable Through Title V Permit
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 the exhaust of the dust collector serving the woodworking operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
4. The PM10 emissions from the dust collector shall not exceed 1.1 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
5. All ducting and control equipment shall be in good working order to prevent fugitive particulate emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
6. All filters shall be properly maintained and must be in place during the woodworking operation(s). [District Rule 2201] Federally Enforceable Through Title V Permit
7. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The 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
9. The baghouse shall operate at all times with a minimum differential pressure of 0.5 inches water column and a maximum differential pressure of 4 inches water column. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201]
11. Dust collector exhaust fan(s) shall be switched on prior to the start-up of any woodworking equipment. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Replacement bags numbering at least 10% of the total number of bags in the baghouse shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] 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 thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter breakthrough and shall be replaced as needed. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Records of dust collector maintenance, inspections, and repairs including all change outs of filter media, 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 2201] Federally Enforceable Through Title V Permit
16. Records of the daily differential operating pressure readings shall be retained on-site. [District Rule 2201] 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 Rule 2201] Federally Enforceable Through Title V Permit

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

ATTACHMENT E

Application

San Joaquin Valley Air Pollution Control District

www.valleyair.org

Permit Application For:

ADMINISTRATIVE AMENDMENT MINOR MODIFICATION SIGNIFICANT MODIFICATION

IA # C-954

1. PERMIT TO BE ISSUED TO: <u>Prison Industry Authority - Avenal</u>	
2. MAILING ADDRESS: STREET/P.O. BOX: <u>#1 Kings Way / Box 8</u> CITY: <u>Avenal</u> STATE: <u>CA</u> 9-DIGIT ZIP CODE: <u>93210</u>	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED: STREET: <u>Same as above</u> CITY: _____ _____ 1/4 SECTION _____ TOWNSHIP _____ RANGE _____	INSTALLATION DATE: _____
4. GENERAL NATURE OF BUSINESS: <u>Correctional Institution</u>	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary) <u>Convert Authority to construct permit # C-954-3-5 to a permit to operate replacing permit # C-954-3-4 adding a CNC Router & a Vertical Panel Saw.</u>	
6. TYPE OR PRINT NAME OF APPLICANT: <u>Rocco Papietro</u>	TITLE OF APPLICANT: <u>PI Manager</u>
SIGNATURE OF APPLICANT: <u>Rocco Papietro</u>	DATE: <u>6/6/13</u>
	PHONE: <u>(559) 386-6061</u> FAX: <u>()</u> EMAIL: <u>Rocco.Papietro@calprca.ca.gov</u>
For APCD Use Only:	
DATE STAMP	FILING FEE RECEIVED: \$ _____ CHECK#: _____ DATE PAID: _____ PROJECT NO: <u>C-1132005</u> FACILITY ID: <u>C-954</u>