

TITLE V PUBLIC NOTICE CHECKLIST

FACILITY ID: C-954 PROJECT #: C-1060792

√ √
REQST. COMPL.

- Title V PRELIMINARY PUBLIC NOTICE
- Title V REVISED PROPOSED PUBLIC NOTICE
- √ Title V FINAL PUBLIC NOTICE
- Title V MODIFICATION PUBLIC NOTICE

ENCLOSED DOCUMENTS REQUIRE:

√ Newspaper Notice Emailed to Clerical (Check box and tab to generate Notice)

√ Stamp current date on all letters and signature page of the evaluation.

√ Send **FINAL** notice letters to CARB, EPA and applicant including the following attachments:

√ Engineering evaluation with attachments.

√ Public notice

√ Send **FINAL** public notice for publication to: Hanford Sentinel.

√ Send signed copies of all **FINAL** notice letters, engineering evaluation with attachments, and public notice to the following:

√ Renald Harris, Permit Services Engineer

√ Enter "Mail Date" onto project record.

√ Attach Compliance Assistance Bulletin "Title V Reporting Requirements" to the facility mailing.

√ Email Chay Thao Engineering Evaluation.

Other special instructions: _____

Date completed: March 14, 2007 By: Renald Harris



ENG
3/21

Erin Green

From: postmaster@sjvweb
Sent: Wednesday, March 21, 2007 3:15 PM
To: Erin Green
Subject: Delivery Status Notification (Relay)



ATT6057150.t Public Notice -
xt Project C-1060..

This is an automatically generated Delivery Status Notification.

Your message has been successfully relayed to the following recipients, but the requested delivery status notifications may not be generated by the destination.

sentinellegals@hanfordsentinel.com

Erin Green

From: Erin Green
Sent: Wednesday, March 21, 2007 3:01 PM
To: Hanford Sentinel (E-mail)
Cc: Ryan Kincaid; Tony Reyes
Subject: Public Notice - Project C-1060792

Importance: High



HANFORD
INAL COVER PC



Doc1.doc

Erin Green
Office Assistant
SJVAPCD
(559) 230-6007



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

MAR 21 2007

Gerardo C. Rios, Chief
Permits Office (AIR-3)
U.S. EPA - Region IX
75 Hawthorne St
San Francisco, CA 94105

**Re: Notice of Final Action - Title V Permit
District Facility # C-954
Project # C-1060792**

Dear Mr. Rios:

The District has issued the Final Title V Permit for Prison Industry Authorities - Avenal. The preliminary decision for this project was made on January 22, 2007. A summary of the comments and the District's response to each comment is included as an attachment to the engineering evaluation.

The public notice for issuance of the Final Title V Permit will be published approximately three days from the date of this letter.

I would like to thank you and your staff for working with us. We appreciate your concurrence with this action. Should you have any questions, please contact Mr. Arnaud Marjollet, Permit Services Manager, at (559) 230-5900.

Sincerely,

David Warner
Director of Permit Services

Attachments

C: Renald Harris, Permit Services Engineer

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
www.valleyair.org

Southern Region

2700 M Street, Suite 275
Bakersfield, CA 93301-2373
Tel: (661) 326-6900 FAX: (661) 326-6985



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

MAR 21 2007

Mike Tollstrup, Chief
Project Assessment Branch
Air Resources Board
P O Box 2815
Sacramento, CA 95812-2815

**Re: Notice of Final Action - Title V Permit
District Facility # C-954
Project # C-1060792**

Dear Mr. Tollstrup:

The District has issued the Final Title V Permit for Prison Industry Authorities - Avenal. The preliminary decision for this project was made on January 22, 2007. A summary of the comments and the District's response to each comment is included as an attachment to the engineering evaluation.

The public notice for issuance of the Final Title V Permit will be published approximately three days from the date of this letter.

I would like to thank you and your staff for working with us. Should you have any questions, please contact Mr. Arnaud Marjollet, Permit Services Manager, at (559) 230-5900.

Sincerely,

David Warner
Director of Permit Services

Attachments

C: Renald Harris, Permit Services Engineer

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San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

MAR 21 2007

Mike Mayes
Prison Industry Authorities - Avenal
#1 King Way
Avenal, CA 93204

**Re: Notice of Final Action - Title V Permit
District Facility # C-954
Project # C-1060792**

Dear Mr. Mayes:

The District has issued the Final Title V Permit for Prison Industry Authorities - Avenal. The preliminary decision for this project was made on January 22, 2007. A summary of the comments and the District's response to each comment is included as an attachment to the engineering evaluation.

The public notice for issuance of the Final Title V Permit will be published approximately three days from the date of this letter.

Thank you for your cooperation in this matter. Should you have any questions, please contact Mr. Arnaud Marjollet, Permit Services Manager, at (559) 230-5900.

Sincerely,

David Warner
Director of Permit Services

Attachments

C: Renald Harris, Permit Services Engineer

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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Hanford Sentinel

**SAN JOAQUIN VALLEY
AIR POLLUTION CONTROL DISTRICT
NOTICE OF FINAL DECISION TO ISSUE
FEDERALLY MANDATED OPERATING PERMIT**

NOTICE IS HEREBY GIVEN that the San Joaquin Valley Air Pollution Control District has made its final decision to issue the initial Federally Mandated Operating Permit to Prison Industry Authorities - Avenal for its Prison Industry Authority #1 King Way in Avenal, California.

The District's analysis of the legal and factual basis for this proposed action, project #C-1060792, is available for public inspection at the District office at the address below. For additional information regarding this matter, please contact Mr. Arnaud Marjollet, Permit Services Manager, at (559) 230-5900, or contact David Warner, Director of Permit Services, in writing at SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT, 1990 E. GETTYSBURG AVE, FRESNO, CA 93726-0244.

SAN JOAQUIN VALLEY UNIFIED AIR POLLUTION CONTROL DISTRICT

Prison Industry Authorities - Avenal

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TITLE V APPLICATION REVIEW

Project #: C-1060792
Deemed Complete: April 18, 2006

Engineer: Renald Harris
Date: March 14, 2007

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

Contact Name: Mike Mayes
Phone: (559) 386-7401

Responsible Official: Mike Mayes
Title: Prison Industries Administrator

I. PROPOSAL

Prison Industry Authority – Avenal is proposing that an initial Title V permit be issued for its existing correctional institution in Avenal, CA. The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with those applicable requirements, and to provide the legal and factual basis for proposed permit conditions.

II. FACILITY LOCATION

Prison Industry Authority - Avenal is located at 1 Kings Way in Avenal, CA.

III. EQUIPMENT LISTING

A detailed facility printout listing all permitted equipment at the facility is shown in Attachment A.

A summary of the exempt equipment categories which describe the insignificant activities or equipment at the facility not requiring a permit is shown in Attachment B. This equipment is not exempt from facility-wide requirements.

IV. GENERAL PERMIT TEMPLATE USAGE

The applicant is requesting to use the following model general permit templates:

A. SJV-UM-0-2 Facility-Wide Umbrella General Permit Template

The applicant has requested to utilize template #SJV-UM-0-2 Facility-Wide Umbrella General Permit Template for unit C-954-0-1. Based on the information submitted on the Template Qualification Form, the applicant qualifies for the use of this template.

V. SCOPE OF EPA AND PUBLIC REVIEW

Certain segments of the proposed Operating Permit are based on model general permit templates that have been previously subject to EPA and public review. The terms and conditions from the model general permit templates are included in the proposed permit and are not subject to further EPA and public review.

For permit applications utilizing model general permit templates, public and agency comments on the District's proposed actions are limited to the applicant's eligibility for model general permit template, applicable requirements not covered by the model general permit template, and the applicable procedural requirements for issuance of Title V Operating Permits.

The following permit conditions, including their underlying applicable requirements, originate from model general permit templates and are not subject to further EPA or public review.

Conditions 1 through 40 and 42 of the requirements for permit unit #C-954-0-1.

VI. APPLICABLE REQUIREMENTS ADDRESSED BY GENERAL PERMIT TEMPLATES

District Rule 1100, Equipment Breakdown (amended December 17, 1992)(Non-SIP replacement for Kern County Rule 111)*

District Rule 1160, Emission Statements (adopted November 18, 1992)*

District Rule 2010 - Permits Required (Amended December 17, 1992) (Non-SIP replacement for Fresno County Rule 201)*

* The Umbrella General Template addressed these requirements for all permit units at the facility.

District Rule 2020 - Exemptions (Amended September 21, 2006) (Non SIP replacement for Fresno County Rule 202)*

District Rule 2031 - Transfer of Permits (Amended December 17, 1992) (Non SIP replacement for Fresno County Rule 203)*

District Rule 2040 - Applications (Amended December 17, 1992)*

District Rule 2070 - Standards for Granting Applications (Amended December 17, 1992) (Non SIP replacement for Fresno County Rule 208)*

District Rule 2520 - Federally Mandated Operating Permits, Sections 5.2, 9.4.2, 9.5.1, 9.5.2, 9.6.1, 9.6.2, 9.8, 9.9.1, 9.9.2, 9.9.3, 9.9.4, 9.9.5, 9.10, 9.13.1, 9.14.1, 9.14.2, 9.17, and 10.0 (Adopted June 21, 2001)*

District Rule 4101 - Visible Emissions (Amended February 17, 2005) (Non SIP replacement for Kings County Rule 401)*

District Rule 4201 - Particulate Matter Concentration (Amended December 17, 1992) (Non SIP replacement for Kings County Rule 404)*

District Rule 4202 - Particulate Matter Emission Rate (Amended December 17, 1992) (Non SIP replacement for Kings County Rule 405)*

District Rule 4601 - Architectural Coatings (Amended April 25, 2003)*

District Rule 8011 - General Requirements (Amended August 19, 2004)*

District Rule 8021, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM-10) from Construction, Demolition, Excavation, and Extraction Activities (Amended August 19, 2004)*

District Rule 8031, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM-10) from Handling and Storage of Bulk Materials (Amended August 19, 2004)*

District Rule 8041, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM-10) from Carryout and Trackout (Amended August 19, 2004)*

District Rule 8051, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM-10) from Open Areas (Amended August 19, 2004)*

* The Umbrella General Template addressed these requirements for all permit units at the facility.

District Rule 8061, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM-10) from Paved and Unpaved Roads (Amended August 19, 2004)*

District Rule 8071, Fugitive Dust Requirements for Control of Fine Particulate Matter (PM-10) from Unpaved Vehicle/Equipment Areas (Amended August 19, 2004)*

40 CFR Part 61, Subpart M, National Emission Standard for Asbestos*

40 CFR Part 82, Subpart B and F, Stratospheric Ozone*

VII. APPLICABLE REQUIREMENTS NOT ADDRESSED BY GENERAL PERMIT TEMPLATES

District Rule 1070 Inspections (Amended December 17, 1992) (Non SIP replacement for Fresno County Rule 107)

District Rule 2520 Federally Mandated Operating Permits - Section 9.4.2 (Adopted June 21, 2001)

District Rule 4201 - Particulate Matter Concentration (Amended December 17, 1992) (Non SIP replacement for Kings County Rule 404)

District Rule 4603 - Surface Coating of Metal Parts and Products (Amended May 18, 2006)

District Rule 4606 - Wood Products Coating Operations (Amended December 20, 2001)

District Rule 4701 - Internal Combustion Engines – Phase 1 (Amended August 21, 2003)

District Rule 4702 - Internal Combustion Engines – Phase 2 (Amended April 20, 2006)

District Rule 4801, Sulfur Compounds (as amended December 17, 1992) - (non SIP replacement for Kings County Rule 406)

17 CCR 93115 Air Toxic Control Measure (ATCM) for Stationary Compression Ignition (CI) Engines (Adopted February 26, 2004)

40 CFR Part 64 - Compliance Assurance Monitoring (CAM)

* The Umbrella General Template addressed these requirements for all permit units at the facility.

VIII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

For each Title V source, the District issues a single permit that contains the Federally Enforceable requirements, as well as the District-only requirements. The District-only requirements are not a part of the Title V Operating Permits. The terms and conditions that are part of the facility's Title V permit are designated as Federally Enforceable Through Title V Permit.

This facility is subject to the following rules that are not currently federally enforceable:

District Rule 4102, Nuisance (amended December 17, 1992)

a. FACILITY-WIDE (C-954-0)

- For this facility, condition #41 of the facility wide conditions is based on the rule identified above and is not Federally Enforceable through the Title V Permit (C-954-0-1).

b. 1,250 HP CATERPILLAR MODEL 3412 STA DIESEL-FIRED EMERGENCY IC ENGINE POWERING A 800 KW ELECTRICAL (C-954-12)

- For this permit, condition #3 is based on the rule identified above and is not Federally Enforceable through Title V Permit (C-954-12-1).

IX. COMPLIANCE

A. Requirements Addressed by Model General Permit Templates

1. Facility Wide Requirements

The applicant is proposing to use a general permit template to address federally applicable facility-wide requirements. Section IV of template SJV-UM-0-0 includes a demonstration of compliance for all applicable requirements. Template conditions have been added to the facility wide requirements as condition numbers 1 through 40 and 42 to assure compliance with these requirements.

B. Requirements Not Addressed by Model General Permit Templates

1. New and Modified Stationary Source Review Rule (District NSR Rule)

This facility was subject to the District NSR Rule upon application for Authority to Construct (ATC). In accordance with the White Paper for Streamlined Development of Part 70 Permit Applications, dated July 10, 1995, conditions from the resulting PTO were addressed to define how NSR permit terms should be incorporated into the Title V permit.

a. WOOD PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN, BINKS MODEL PFF-16-10-T-LH SPRAY PAINT BOOTH WITH EXHAUST FILTERS, AND VERID GUNWASHER MODEL 200-1 (COMMON WITH C-954-2). (C-954-1)

- Condition 1 from the current PTO has been included as condition 1 of the requirements for permit unit C-954-1-3.
- Condition 2 from the current PTO has been included as condition 22 of the facility wide requirements C-954-0-1.
- Condition 3 from the current PTO has been included as condition 3 of the requirements for permit unit C-954-1-3.
- Condition 4 from the PTO has been removed for exceeding its effective date.
- Condition 5 from the current PTO has been updated and included as condition 4 of the requirements for permit unit C-954-1-3.
- Condition 6 from the PTO has been removed for exceeding its effective date.
- Condition 7 from the current PTO has been updated and included as condition 5 of the requirements for permit unit C-954-1-3.
- Condition 8 through 11 from the PTO has been included as condition 6 through 9 of the requirements for permit unit C-954-1-3.
- Conditions 12 and 13 from the PTO have been removed for exceeding their effective dates.
- Conditions 14 and 15 from the current PTO have been updated and included as conditions 10 and 11 of the requirements for permit units C-954-1-3.
- Condition 17 through 20 from the PTO has been included as condition 12 through 15 of the requirements for permit unit C-954-1-3.

- Condition 21 from the current PTO has been updated and included as condition 16 of the requirements for permit units C-954-1-3.
 - Condition 22 from the current PTO has been included as condition 17 of the requirements for permit units C-954-1-3.
- b. WOOD PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN, BINKS MODEL PFF-16-10-T-LH SPRAY PAINT BOOTH WITH EXHAUST FILTERS AND VERID GUNWASHER MODEL 200-1 (COMMON WITH C-954-1) AND LOCATED IN BLDG #290, FURNITURE FACTORY. (C-954-2)
- Condition 1 from the current PTO has been included as condition 1 of the requirements for permit units C-954-2-3.
 - Condition 2 from the current PTO has been included as condition 22 of the facility wide requirements C-954-0-1.
 - Condition 3 from the current PTO has been included as condition 3 of the requirements for permit units C-954-2-3.
 - Condition 4 from the PTO has been removed for exceeding its effective date.
 - Condition 5 from the current PTO has been updated and included as condition 4 of the requirements for permit units C-954-2-3.
 - Condition 6 from the PTO has been removed for exceeding its effective date.
 - Condition 7 from the current PTO has been updated and included as condition 5 of the requirements for permit units C-954-2-3.
 - Condition 8 through 11 from the PTO has been included as condition 6 through 9 of the requirements for permit unit C-954-2-3.
 - Conditions 12 and 13 from the PTO have been removed for exceeding their effective dates.
 - Conditions 14 and 15 from the current PTO have been updated and included as conditions 10 and 11 of the requirements for permit units C-954-2-3.
 - Condition 17 through 20 from the PTO has been included as condition 12 through 15 of the requirements for permit unit C-954-2-3.
 - Condition 21 from the current PTO has been updated and included as condition 16 of the requirements for permit units C-954-2-3.
 - Condition 22 from the current PTO has been included as condition 17 of the requirements for permit units C-954-2-3.

- c. WOOD FURNITURE FACTORY SERVED BY AN R.P. RICHARDS MODEL 12-216-3464 BAGHOUSE DUST COLLECTOR WITH REVERSE PULSED-JET CLEANING SYSTEM, LOCATED IN BLDG #290, FURNITURE FACTORY (C-954-3)
- Conditions 1 and 2 from the current PTO have been included as conditions 1 and 2 of the requirements for permit units C-954-3-2.
 - Condition 3 from the current PTO has been included as condition 22 of the facility wide requirements C-954-0-1.
 - Conditions 4 and 5 from the current PTO have been included as conditions 3 and 4 of the requirements for permit units C-954-3-2.
- d. POWDER COATING OPERATION CONSISTING OF POWDER COATING BOOTH, 1.8 MMBTU/HR DRY-OFF OVEN, 3.3 MMBTU/HR BAKE OVEN AND 0.34 MMBTU/HR CONTROLLED PYROLYSIS FURNACE WITH INTEGRAL AFTERBURNER FOR PARTS HANGER CLEANING (C-954-4)
- Condition 1 from the current PTO has been included as condition 1 of the requirements for permit units C-954-4-6.
 - Condition 2 from the current PTO has been included as condition 22 of the facility wide requirements C-954-0-1.
 - Conditions 3 through 8 from the current PTO has been included as conditions 2 through 7 of the requirements for permit units C-954-4-6.
 - Condition 9 from the current PTO has been updated and included as conditions 11 and 12 of the requirements for permit units C-954-4-6.
- e. POWDER COATING OPERATION WITH ELECTROSTATIC APPLICATION EQUIPMENT, BOOTH WITH DRY FILTERS AND 0.75 MMBTU/HR NATURAL GAS-FIRED BATCH CURING OVEN (C-954-10)
- Conditions 1 and 2 from the current PTO have been included as conditions 1 and 2 of the requirements for permit unit C-954-10-2.
 - Condition 3 from the current PTO has been included as condition 22 of the facility wide requirements C-954-0-1.
 - Condition 4 from the current PTO has been included as condition 3 of the requirements for permit units C-954-10-2.

- Conditions 5 through 13 from the current PTO have been removed because they are not applicable to this operation.
 - Condition 14 from the current PTO has been updated and included as conditions 8 and 9 of the requirements for permit units C-954-10-2.
 - Condition 15 from the current PTO has been included as condition 10 of the requirements for permit units C-954-10-2.
- f. 1,250 HP CATERPILLAR MODEL 3412 STA DIESEL-FIRED EMERGENCY IC ENGINE POWERING A 800 KW ELECTRICAL GENERATOR. (C-954-12)
- Condition 1 from the current PTO has been included as condition 22 of the facility wide requirements C-954-0-1.
 - Condition 2 from the current PTO has been included as condition 2 of the requirements for permit units C-954-12-1.
 - Conditions 3 through 5 from the current PTO has been updated and included as conditions 3, 5 and 8 of the requirements for permit units C-954-12-1.
 - Conditions 6 through 8 from the PTO have been included as conditions 6, 7 and 1 of the requirements for permit unit C-954-12-1.
 - Condition 9 from the current PTO has been updated and included as condition 11, 12 and 13 of the requirements for permit units C-954-12-1.

2. District Rule 1070

District Rule 1070 has been submitted to the EPA to replace Kings County Rule 103.1, which is SIP approved. District Rule 1070 is as stringent as King County Rule 103.1, as shown on Table 1.

Table 1 – Comparison of District Rule 1070 and Kings County Rule 103.1

<i>Authority</i>	<i>SJVUAPCD 1070</i>	<i>KCAPCD 103.1</i>
<i>Inspections shall be made by the enforcement agency for the purpose of obtaining information necessary to determine whether air pollution sources are in compliance with applicable rules and regulations.</i>	✓	✓
<i>The District also has the authority to require record keeping, to make inspections and to conduct tests of air pollution sources.</i>	✓	✓

- a. WOOD FURNITURE FACTORY SERVED BY AN R.P. RICHARDS MODEL 12-216-3464 BAGHOUSE DUST COLLECTOR WITH REVERSE PULSED-JET CLEANING SYSTEM. LOCATED IN BLDG #290, FURNITURE FACTORY (C-954-3)
- Section 3.0 of Rule 1070 grants the District authority to do inspections for the purpose of obtaining information to determine if the facility is in compliance with the District Rules and Regulations. Condition 6 of the requirements for permit unit C-954-3-2 requires daily records maintained on site.
 - Section 4.0 of Rule 1070 grants the District authority to require record keeping, to make inspections, and to conduct tests of air pollution sources. Condition 6 of the requirements for permit unit C-954-3-2 requires the facility to retain daily records and make available for District inspection upon request, both daily records and District quarterly reports.
- b. POWDER COATING OPERATION CONSISTING OF POWDER COATING BOOTH, 1.8 MMBTU/HR DRY-OFF OVEN, 3.3 MMBTU/HR BAKE OVEN AND 0.34 MMBTU/HR CONTROLLED PYROLYSIS FURNACE WITH INTEGRAL AFTERBURNER FOR PARTS HANGER CLEANING (C-954-4)
- Section 3.0 of Rule 1070 grants the District authority to do inspections for the purpose of obtaining information to determine if the facility is in compliance with the District Rules and Regulations. Conditions 11 and 12 of the requirements for permit unit C-954-4-6 requires daily records maintained on site.
 - Section 4.0 of Rule 1070 grants the District authority to require record keeping, to make inspections, and to conduct tests of air pollution sources. Conditions 11 and 12 of the requirements for permit unit C-954-4-6 requires the facility to retain daily records and make available for District inspection upon request, both daily records and District quarterly reports.

c. POWDER COATING OPERATION WITH ELECTROSTATIC APPLICATION EQUIPMENT, BOOTH WITH DRY FILTERS AND 0.75 MMBTU/HR NATURAL GAS-FIRED BATCH CURING OVEN (C-954-10)

- Section 3.0 of Rule 1070 grants the District authority to do inspections for the purpose of obtaining information to determine if the facility is in compliance with the District Rules and Regulations. Conditions 8 and 9 of the requirements for permit unit C-954-4-6 requires daily records maintained on site.
- Section 4.0 of Rule 1070 grants the District authority to require record keeping, to make inspections, and to conduct tests of air pollution sources. Conditions 8 and 9 of the requirements for permit unit C-954-4-6 requires the facility to retain daily records and make available for District inspection upon request, both daily records and District quarterly reports.

3. District Rule 2520

Section 9.4.2 contains requirements to incorporate all applicable recordkeeping requirements into the Operating Permit, specific records of any required monitoring, and the retention of all required monitoring data and support information for five years.

a. WOOD FURNITURE FACTORY SERVED BY AN R.P. RICHARDS MODEL 12-216-3464 BAGHOUSE DUST COLLECTOR WITH REVERSE PULSED-JET CLEANING SYSTEM. LOCATED IN BLDG #290, FURNITURE FACTORY (C-954-3)

Conditions 5 and 6 of the requirements for permit unit C-954-3-2 specify records of any required monitoring to assure compliance with PM emission limits.

b. 1,250 HP CATERPILLAR MODEL 3412 STA DIESEL-FIRED EMERGENCY IC ENGINE POWERING A 800 KW ELECTRICAL GENERATOR (C-954-12)

Conditions 11 through 13 of the requirements for permit unit C-954-12-1 specify records of any required monitoring to assure compliance with PM emission limits.

4. District Rule 4201 – Particulate Matter Concentration

Section 3.1 of District Rule 4201 requires emissions to be at or below 0.1 grain per dry standard cubic foot of gas. Compliance with this limit can be shown as follows:

- a. WOOD PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN, BINKS MODEL PFF-16-10-T-LH SPRAY PAINT BOOTH WITH EXHAUST FILTERS, AND VERID GUNWASHER MODEL 200-1 (COMMON WITH C-954-2) (C-954-1)
 - Condition 1 of the requirements for permit unit C-954-1-3 assures compliance with these requirements.
- b. WOOD PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN, BINKS MODEL PFF-16-10-T-LH SPRAY PAINT BOOTH WITH EXHAUST FILTERS AND VERID GUNWASHER MODEL 200-1 (COMMON WITH C-954-1) AND LOCATED IN BLDG #290, FURNITURE FACTORY (C-954-2)
 - Condition 1 of the requirements for permit unit C-954-2-3 assures compliance with these requirements.
- c. WOOD FURNITURE FACTORY SERVED BY AN R.P. RICHARDS MODEL 12-216-3464 BAGHOUSE DUST COLLECTOR WITH REVERSE PULSED-JET CLEANING SYSTEM. LOCATED IN BLDG #290, FURNITURE FACTORY (C-954-3)
 - Condition 2 of the requirements for permit unit C-954-3-2 assures compliance with these requirements.
- d. POWDER COATING OPERATION CONSISTING OF POWDER COATING BOOTH, 1.8 MMBTU/HR DRY-OFF OVEN, 3.3 MMBTU/HR BAKE OVEN AND 0.34 MMBTU/HR CONTROLLED PYROLYSIS FURNACE WITH INTEGRAL AFTERBURNER FOR PARTS HANGER CLEANING (C-954-4)

- Condition 2 of the requirements for permit unit C-954-4-6 assures compliance with these requirements.

e. POWDER COATING OPERATION WITH ELECTROSTATIC APPLICATION EQUIPMENT, BOOTH WITH DRY FILTERS AND 0.75 MMBTU/HR NATURAL GAS-FIRED BATCH CURING OVEN (C-954-10)

- Condition 1 of the requirements for permit unit C-954-10-2 assures compliance with these requirements.

f. 1,250 HP CATERPILLAR MODEL 3412 STA DIESEL-FIRED EMERGENCY IC ENGINE POWERING A 800 KW ELECTRICAL GENERATOR (C-954-12)

- Condition 1 of the requirements for permit unit C-954-12-1 assures compliance with these requirements.

5. District Rule 4603 – Surface Coating of Metal Parts and Products

Rule 4603 limits the emissions of volatile organic compounds (VOCs) from the coating of metal parts and products, and from the organic solvent cleaning and storage and disposal of solvents and waste solvent materials associated with such coating. Metal coating operations C-954-4 and C-954-10 use coatings that do not contain VOCs, and a condition will be placed on all involved permits to assure compliance.

a. POWDER COATING OPERATION CONSISTING OF POWDER COATING BOOTH, 1.8 MMBTU/HR DRY-OFF OVEN, 3.3 MMBTU/HR BAKE OVEN AND 0.34 MMBTU/HR CONTROLLED PYROLYSIS FURNACE WITH INTEGRAL AFTERBURNER FOR PARTS HANGER CLEANING (C-954-4)

- Condition 10 of the requirements for permit unit C-954-4-6 assures compliance with these requirements.

b. POWDER COATING OPERATION WITH ELECTROSTATIC APPLICATION EQUIPMENT, BOOTH WITH DRY FILTERS AND 0.75 MMBTU/HR NATURAL GAS-FIRED BATCH CURING OVEN (C-954-10)

- Condition 7 of the requirements for permit unit C-954-10-2 assures compliance with these requirements.

6. District Rule 4606 – Wood Products Coating Operations

The purpose of this rule is to limit the emissions of volatile organic compounds (VOCs) from wood products coating operations, and from the organic solvent cleaning, and the storage and disposal of solvents and waste solvent materials associated with such coating operations.

- a. WOOD PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN, BINKS MODEL PFF-16-10-T-LH SPRAY PAINT BOOTH WITH EXHAUST FILTERS, AND VERID GUNWASHER MODEL 200-1 (COMMON BETWEEN C-954-1 AND C-954-2) (C-954-1 AND C-954-2)

Section 5.1 states the following limits: A person or operator shall not apply any coating to a wood product which has a VOC content, as applied, which exceeds the applicable limit specified below:

VOC Limits				
Grams of VOC per Liter of Coating, Excluding Water and Exempt Compounds				
Coating Category	Effective 12/19/96		Effective 7/1/2005	
	g/l	lb/gal	g/l	lb/gal
Clear Topcoat	550	4.6	275	2.3
Filler	500	4.2	275	2.3
High-Solids Stain	700	5.8	240	2.0
Ink	500	4.2	500	4.2
Mold-Seal Coating	750	6.3	750	6.3
Multi-Colored Coating	275	2.3	275	2.3
Pigmented Coating	550	4.6	275	2.3
Sanding Sealer	550	4.6	275	2.3

VOC Limits				
Grams of VOC per Liter of Material				
Coating Category	Effective 12/19/96		Effective 7/1/2005	
	g/l	lb/gal	g/l	lb/gal
Low-Solids Stain	480	4.0	120	1.0
Stripper	350	2.9	350	2.9

Conditions 3, 4 and 5 of requirements for permit units C-954-1-3 & C-954-2-3 will assure compliance with this section.

Section 5.4 states that a person or operator shall not apply coatings to wood products subject to the provisions of this rule unless the coating is applied with properly operating equipment, according to proper operating procedures, and by the use of one of the following methods:

- Electrostatic application;
- High-Volume, Low-Pressure (HVLP) spray,

High-Volume, Low-Pressure (HVLP) spray equipment shall be operated in accordance with the manufacturer's recommendations.

For HVLP spray guns manufactured prior to January 1, 1996, the end user shall demonstrate that the gun meets HVLP spray equipment standards. Satisfactory proof will be either in the form of manufacturer's published technical material or by a demonstration using a certified air pressure tip gauge, measuring the air atomizing pressure dynamically at the center of the air cap and at the air horns.

Conditions 6 and 7 of requirements for permit units C-954-1-3 & C-954-2-3 will assure compliance with this section.

Section 5.6.3 states that on and after November 15, 2003, an owner or operator shall not use organic solvents for cleaning operations that exceed the VOC content limits specified as being "Effective November 15, 2003" in Table 3.

Condition 11 of requirements for permit units C-954-1-3 & C-954-2-3 will assure compliance with this section.

Section 5.6.6 states that cleaning activities that use solvents shall be performed by one or more of the following methods:

- Wipe cleaning; or
- Application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; or
- Non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or

- Solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping.

Condition 9 of requirements for permit units C-954-1-3 & C-954-2-3 will assure compliance with this section.

Section 5.6.8 states that an owner or operator shall not use VOC-containing materials to clean spray equipment used for the application of coatings, adhesives, or ink, unless an enclosed system or equipment that is proven to be equally effective at controlling emissions is used for cleaning. If an enclosed system is used, it must totally enclose spray guns, cups, nozzles, bowls, and other parts during washing, rinsing and draining procedures, and it must be used according to the manufacturer's recommendations and must be closed when not in use.

Condition 10 of requirements for permit units C-954-1-3 & C-954-2-3 will assure compliance with this section.

Section 5.6.10 states that an owner or operator shall store or dispose of fresh or spent solvents, waste solvent cleaning materials such as cloth, paper, etc., coatings, adhesives, catalysts, and thinners in closed, non-absorbent and non-leaking containers. The containers shall remain closed at all times except when depositing or removing the contents of the containers or when the container is empty.

Condition 8 of requirements for permit units C-954-1-3 & C-954-2-3 will assure compliance with this section.

Section 6.0 states that effective on and after November 15, 2002, the records kept in compliance with Sections 6.1, 6.2, and 6.3 shall be retained on site for a minimum of five (5) years and made available for inspection by the APCO upon request.

Condition 16 of requirements for permit units C-954-1-3 & C-954-2-3 will assure compliance with this section.

Section 6.1.1 states that any person subject to Sections 5.1, 5.2, 5.3, or 5.4 and users of coatings exempt by Section 4.1.2, or 4.4, shall comply with the following requirements:

Maintain a current list of coatings and solvents in use which provides all of the data necessary to evaluate compliance, including the following information, as applicable:

- identify coatings, catalysts, reducers, and solvents.
- manufacturer's recommended mix ratio of components.
- VOC content of coatings, as applied.
- VOC content of solvents.

Maintain records on a daily basis that provide the following information, as applicable:

- coating and mix ratio of components in the coating used.
- quantity of each coating applied.
- identification of coating category.
- type and amount of solvent used for cleanup and surface preparation.

Conditions 14 & 15 of requirements for permit units C-954-1-3 & C-954-2-3 will assure compliance with this section.

7. District Rule 4701 – Internal Combustion Engines – Phase 1

The purpose of this rule is to limit the emissions of nitrogen oxides (NO_x), carbon monoxide (CO), and volatile organic compounds (VOC) from internal combustion engines. This rule applies to any internal combustion engine, rated greater than 50 bhp, which requires a Permit to Operate (PTO). Sections 5.2, 5.4, 6.2, 6.3, and 6.4 apply to the units at this facility. The requirements are listed below:

- a. 1,250 HP CATERPILLAR MODEL 3412 STA DIESEL-FIRED EMERGENCY IC ENGINE POWERING A 800 KW ELECTRICAL GENERATOR (C-954-12)

Section 4.2.1 states, standby engines is Any internal combustion engine used exclusively for non-utility electric power generation or any other emergency engine, approved by the APCO, and limited by permit condition to operate no more than 200 hours per calendar year for non-emergency purposes and not used in conjunction with any voluntary utility demand reduction program.

- Condition 8 of the requirements for permit unit C-954-12-1 assures compliance with these requirements.

8. District Rule 4702 – Internal Combustion Engines – Phase 2

The purpose of this rule is to limit the emissions of nitrogen oxides (NO_x), carbon monoxide (CO), and volatile organic compounds (VOC) from spark-ignited IC engine. This rule applies to any spark-ignited internal combustion engine with a rated brake horsepower greater than 50 horsepower and that requires a Permit-to-Operate (PTO).

- a. 1,250 HP CATERPILLAR MODEL 3412 STA DIESEL-FIRED EMERGENCY IC ENGINE POWERING A 800 KW ELECTRICAL GENERATOR (C-954-12)

Section 4.2.1 states, an emergency standby engine as defined in Section 3.0 of this rule, and provided that it is operated with a nonresettable elapsed operating time meter. In lieu of a nonresettable time meter, the owner of an emergency engine may use an alternative device, method, or technique, in determining operating time provided that the alternative is approved by the APCO. The owner of the engine shall properly maintain and operate the time meter or alternative device in accordance with the manufacturer's instructions.

- Conditions 4 and 8 of the requirements for permit unit C-954-12-1 assures compliance with these requirements.

Section 5.7.2 states, properly operate and maintain each engine as recommended by the engine manufacturer or emission control system supplier.

- Condition 9 of the requirements for permit unit C-954-12-1 assures compliance with these requirements.

Section 5.7.3 states, monitor the operational characteristics of each engine as recommended by the engine manufacturer or emission control system supplier.

- Condition 10 of the requirements for permit unit C-954-12-1 assures compliance with these requirements.

Section 5.7.4 states, install and operate a nonresettable elapsed operating time meter. In lieu of installing a nonresettable time meter, the owner of an engine may use an alternative device, method, or technique, in determining operating time provided that the alternative is approved by the APCO and is allowed by Permit-to-Operate or Permit-Exempt Equipment Registration condition. The owner of the engine shall properly maintain and operate the time meter or alternative device in accordance with the manufacturer's instructions.

- Condition 4 of the requirements for permit unit C-954-12-1 assures compliance with these requirements.

Section 6.2.3 states, an owner claiming emergency standby or low-use exemptions under shall maintain annual operating records. This information shall be retained for at least five years, shall be readily available, and provided to the APCO upon request.

The records shall include, but are not limited to, the following:

- Total hours of operation,
 - The type of fuel used,
 - The purpose for operating the engine,
 - For emergency standby engines, all hours of non-emergency and emergency operation shall be reported, and
 - Other support documentation necessary to demonstrate claim to the exemption.
-
- Conditions 11 and 13 of the requirements for permit unit C-954-12-1 assures compliance with these requirements.

9. District Rule 4801 – Sulfur Compounds

District Rule 4801 has been submitted to the EPA to replace Kings County APCD Rule 407, which is in the SIP. District Rule 4801 is as stringent as Kings County Rule 407, as shown on Table 10.

Table 10 - Comparison of District Rule 4801 and Kings County Rule 407

REQUIREMENT	4801 District	407 Kings
a person shall not discharge into the atmosphere sulfur compounds exceeding in concentration at the point of discharge 0.2 percent by volume calculated as sulfur dioxide on a dry basis averaged over 15 consecutive minutes.	✓	✓
EPA Method 8 and ARB Method 1-100 shall be used to determine such emissions.	✓	

Section 3.1 requires that sulfur compounds, existing as a liquid or gas at standard conditions, shall not be discharged into the atmosphere in concentration at the point of discharge which exceeds (0.2) percent by volume calculated as sulfur dioxide (SO₂) on a dry basis averaged over 15 consecutive minutes.

$$0.2\% \text{ by Volume} = \left(\frac{0.2}{100} \right) = \left(\frac{2000}{1000000} \right) = 2000 \text{ ppmv based on 15 minute average}$$

a. 1,250 HP CATERPILLAR MODEL 3412 STA DIESEL-FIRED EMERGENCY IC ENGINE POWERING A 800 KW ELECTRICAL GENERATOR (C-954-12)

- Condition 5 of the requirements for permit unit C-954-12-1 assures compliance with these requirements.

10. Title 17 CCR, Section 93115 – Airborne Toxic Control Measure (ATCM) for Stationary Compression-Ignition (CI) Engines (State Only Requirement)

The purpose of this ATCM is to reduce diesel particulate matter (PM) and criteria pollutant emissions from stationary diesel-fueled compression ignition (CI) engines.

a. 1,250 HP CATERPILLAR MODEL 3412 STA DIESEL-FIRED EMERGENCY IC ENGINE POWERING A 800 KW ELECTRICAL GENERATOR (C-954-12)

This ATCM requires that no owner or operator shall operate an in-use stationary emergency standby diesel-fueled CI engine (>50 bhp) that emits diesel PM at a rate greater than 0.15 g/bhp-hr more than 50 hours per year for maintenance and testing purposes.

- Condition 8 of the requirements for permit unit C-954-12-1 assures compliance with these requirements.

The ATCM requires that in-use emergency standby engines are required to use only diesel fuels that meet the definition of CARB diesel at the time of purchase.

- Condition 5 of the requirements for permit unit C-954-12-1 assures compliance with these requirements.

The ATCM requires that owner or operator of an emergency standby diesel-fueled CI engine shall keep a monthly log of usage that shall list and document the nature of use for each of the following:

- Emergency use hours of operation;
 - Maintenance and testing hours of operation;
 - Hours of operation for any emission testing;
 - Initial start-up hours;
 - If applicable, hours of operation to comply with the requirements of NFPA 25;
 - Hours of operation for all uses other than those specified above; and
 - The fuel used.
- Conditions 4, 11 and 13 of the requirements for permit unit C-954-12-1 assures compliance with these requirements.

The owner or operator shall document fuel use through the retention of fuel purchase records that account for all fuel used in the engine and all fuel purchased for use in the engine, and, at a minimum, contain the following information for each individual fuel purchase transaction:

- Identification of the fuel purchased as either CARB Diesel;
 - Amount of fuel purchased;
 - Date when the fuel was purchased;
 - Signature of owner or operator or representative of owner or operator who received the fuel; and
 - Signature of fuel provider indicating fuel was delivered.
- Condition 12 of the requirements for permit unit C-954-12-1 assures compliance with these requirements.

11. 40 CFR Part 64 - Compliance Assurance Monitoring (CAM)

§64.2 – Applicability

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

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

§64.3 - Monitoring Design Criteria

This section specifies the design criteria for the CAM system.

Paragraph (a) (*General criteria*) requires that the CAM system be designed to obtain data for one or more appropriate indicators of emission control system performance and requires the owner to establish appropriate ranges or designated conditions for the selected indicators such that operation within the ranges provides a reasonable assurance of ongoing compliance with emission limitations or standards for the anticipated range of operating conditions.

Paragraph (b) (*Performance criteria*) requires the owner or operator to establish and maintain the following:

- Specifications to ensure that representative data are collected
- Verification procedures for startup of new monitoring equipment
- Quality assurance and control practices to ensure continuing validity of data

- Data collection frequency and procedures

Paragraph (c) (*Evaluation factors*) requires the owner or operator to take into account site specific factors in the design of the CAM system.

Paragraph (d) (*Special criteria for the use of continuous emission, opacity, or predictive monitoring systems*) requires the owner or operator to use a continuous emission monitoring system (CEMS), continuous opacity monitoring system (COMS), or a predictive emission monitoring system (PEMS) to satisfy CAM requirements, provided that these monitoring systems are required pursuant to other authority under the Clean Air Act or state or local law. This subsection also stipulates the following:

- The use of a CEMS, COMS, or PEMS that satisfies any of the following monitoring requirements shall be deemed to satisfy the general design criteria in paragraphs (a) and (b) of this section, provided that a COMS may be subject to the criteria for establishing indicator ranges under paragraph (a) of this section:

- (i) Section 51.214 and appendix P of 40 CFR 51;
- (ii) Section 60.13 and appendix B of 40 CFR 60;
- (iii) Section 63.8 and any applicable performance specifications required pursuant to the applicable subpart of 40 CFR 63;
- (iv) 40 CFR 75;
- (v) Subpart H and appendix IX of 40 CFR 266; or
- (vi) In the event that the monitoring system is not subject to any of the requirements listed above, comparable requirements and specifications established by the permitting authority.

- The owner or operator shall design the monitoring system subject to this paragraph (d) to:

(i) Allow for reporting of exceedances (or excursions if applicable to a COMS used to assure compliance with a particulate matter standard), consistent with any period for reporting of exceedances in an underlying requirement. If an underlying requirement does not contain a provision for establishing an averaging period for the reporting of exceedances or excursions, the criteria used to develop an averaging period specified in the data collection procedures required under paragraph (b) of this section shall apply; and

(ii) Provide an indicator range consistent with paragraph (a) of this section for a COMS used to assure compliance with a particulate matter standard. If an opacity standard applies to the pollutant-specific emissions unit, such limit may be used as the appropriate indicator range unless the opacity limit fails to meet the criteria in paragraph (a) of this section after considering the type of control device and other site-specific factors applicable to the pollutant-specific emissions unit.

§64.4 - Submittal Requirements

This section specifies submittal requirements for the owner or operator which ensure the CAM system will comply with the design criteria of §64.3.

§64.5 - Deadlines for Submittals

This section specifies required timing for submittals required under §64.4.

Large pollutant-specific emissions units (those with controlled emissions exceeding major source thresholds) are required to make the submittals as a part of the initial Title V permit application where the application has either not been filed or has not been deemed complete. Where the initial Title V permit has been issued without implementation of 40 CFR 64, the owner or operator must make the required submittals as a part of a subsequent application for any significant permit revision. If the required information is not submitted by either of these deadlines, it must be submitted as a part of the application for the Title V permit renewal.

For *other pollutant-specific emissions units*, the required submittal deadline is the application for Title V permit renewal.

§64.6 - Approval of monitoring

This section stipulates the following:

- A requirement that the permitting authority act to approve the proposed monitoring by confirming that the monitoring submitted complies with the requirements of §64.3
- An allowance for the permitting authority to condition the approval based on collecting additional data on the indicators to be monitored, including performance or compliance testing

- The minimum conditions that must be placed on the permit in the event that the proposed monitoring is approved by the permitting authority including a milestone schedule for completion of any conditional approval actions required by the owner or operator, such as installations, testing, or verification of operational status
- Actions required by the permitting authority in the event that the proposed monitoring is not approved

The CAM submittal requirements and stipulations for approval of such submittals pursuant to §64.4, §64.5, and §64.6 have been completed in conjunction with the application and review process for this renewal of the Title V permit.

§64.7 - Operation of Approved Monitoring

This section stipulates the following:

- Requirements that the owner or operator 1) commence the monitoring upon receipt of a Title V permit that includes such monitoring, 2) properly maintain the monitoring system, and 3) conduct all monitoring in a continuous mode with the exception of outage periods associated with monitor malfunction and repair and with quality assurance and control activities
- Actions required by the owner or operator in response to excursions or exceedances
- A requirement for the owner or operator to document any need for improved monitoring based upon either an identification of a failure of the monitoring system to identify an excursion or exceedance or upon the results of compliance or performance testing that identifies a need to modify the monitoring

§64.8 - Quality Improvement Plan (QIP) Requirements

This section stipulates that the Administrator or the permitting authority may require that the facility develop and implement a QIP in the event of a determination of a need for improved monitoring pursuant to §64.7. §64.8 also identifies the minimum elements required in the QIP, and requires that the facility implement the QIP as expeditiously as possible, with implementation not exceeding 180 days after the date that the need for implementation was identified unless the permitting authority is notified.

§64.9 - Reporting and Recordkeeping Requirements

This section stipulates the minimum reporting and recordkeeping requirements for facilities subject to 40 CFR 64.

§64.10 - Savings Provisions

This section states that the purpose of 40 CFR 64 is to require, as a part of the issuance of a Title V permit, improved or new monitoring at those emissions units where monitoring requirements do not exist or are inadequate to meet the requirements of 40 CFR 64. In addition, §64.10 states that nothing in 40 CFR 64 shall excuse an owner or operator from any other requirements of federal, state or local law or restrict or abrogate the authority of the Administrator or of the permitting authority.

- a. WOOD PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN, BINKS MODEL PFF-16-10-T-LH SPRAY PAINT BOOTH WITH EXHAUST FILTERS, AND VERID GUNWASHER MODEL 200-1 (COMMON WITH C-954-2) (C-954-1)

This unit is not subject to CAM for VOC since it is not equipped with any add-on controls for these pollutants. However, Unit C-954-1 is subject to CAM for PM₁₀ since there is a limit for this pollutant, the unit is equipped with add-on control device for the PM₁₀ pollutant (i.e. spray paint booth with exhaust filters), and as shown below the pre-control potential to emit is not greater than the major source threshold of 140,000 pounds PM₁₀/year.

Given:

- 1) Annual Emission Limit (AEL) = 949 lb-PM₁₀/yr
- 2) Add-on Control Device Control Efficiency (Booth) = 66%
- 3) Threshold Limit = 140,000 lb-PM₁₀/yr

Using the following Eqn:

$$\begin{aligned} PE_{\text{Uncontrolled}} &= \text{AEL} \div (1 - \text{CE}) \\ &= 949 \text{ lb-PM}_{10}/\text{yr} \div (1 - 0.66) \\ &= 2,791 \text{ lb-PM}_{10}/\text{yr} \end{aligned}$$

$$2,791 \text{ lb-PM}_{10}/\text{yr} \ll 140,000 \text{ lb-PM}_{10}/\text{yr}$$

The uncontrolled PE is less than the major source threshold limit; therefore, this requirement is not applicable for this permit unit.

- b. WOOD PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN, BINKS MODEL PFF-16-10-T-LH SPRAY PAINT BOOTH WITH EXHAUST FILTERS AND VERID GUNWASHER MODEL 200-1 (COMMON WITH C-954-1) AND LOCATED IN BLDG #290, FURNITURE FACTORY

This unit is not subject to CAM for VOC since it is not equipped with any add-on controls for these pollutants. However, Unit C-954-2 is subject to CAM for PM₁₀ since there is a limit for this pollutant, the unit is equipped with add-on control device for the PM₁₀ pollutant (i.e. spray paint booth with exhaust filters), and as shown below the pre-control potential to emit is not greater than the major source threshold of 140,000 pounds PM₁₀/year.

Given:

- 1) Annual Emission Limit (AEL) = 949 lb-PM₁₀/yr
- 2) Add-on Control Device Control Efficiency (Booth) = 66%
- 3) Threshold Limit = 140,000 lb-PM₁₀/yr

Using the following Eqn:

$$\begin{aligned} PE_{\text{Uncontrolled}} &= \text{AEL} \div (1 - \text{CE}) \\ &= 949 \text{ lb-PM}_{10}/\text{yr} \div (1 - 0.66) \\ &= 2,791 \text{ lb-PM}_{10}/\text{yr} \end{aligned}$$

2,791 lb-PM₁₀/yr << 140,000 lb-PM₁₀/yr

The uncontrolled PE is less than the major source threshold limit; therefore, this requirement is not applicable for this permit unit.

- c. WOOD FURNITURE FACTORY SERVED BY AN R.P. RICHARDS MODEL 12-216-3464 BAGHOUSE DUST COLLECTOR WITH REVERSE PULSED-JET CLEANING SYSTEM. LOCATED IN BLDG #290, FURNITURE FACTORY

Unit C-954-3 emits only PM₁₀ and may be subject to CAM for PM₁₀, as there is a PM₁₀ limit, and it does have add-on controls in the form of a fabric collector. However, as shown below, the pre-control potential to emit is not greater than the major source threshold of 140,000 pounds PM₁₀/year.

Given:

- 1) Annual Emission Limit (AEL) = 402 lb-PM₁₀/yr

- 2) Add-on Control Device Control Efficiency (Booth) = 99%
- 3) Threshold Limit = 140,000 lb-PM₁₀/yr

Using the following Eqn:

$$\begin{aligned} PE_{\text{Uncontrolled}} &= AEL \div (1 - CE) \\ &= 402 \text{ lb-PM}_{10}/\text{yr} \div (1 - 0.99) \\ &= 40,200 \text{ lb-PM}_{10}/\text{yr} \end{aligned}$$

40,200 lb-PM₁₀/yr << 140,000 lb-PM₁₀/yr

The uncontrolled PE is less than the major source threshold limit; therefore, this requirement is not applicable for this permit unit.

X. PERMIT SHIELD

Not Applicable

XI. PERMIT CONDITIONS

See draft operating permit beginning on the following page.



San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

Permit to Operate

FACILITY: C-954

EXPIRATION DATE: 08/31/2011

LEGAL OWNER OR OPERATOR:

PRISON INDUSTRY AUTHORITY--AVENAL

MAILING ADDRESS:

ACCOUNTING
P O BOX 8
AVENAL, CA 93204

FACILITY LOCATION:

1 KINGS WAY
AVENAL, CA 93204

FACILITY DESCRIPTION:

CORRECTIONAL INSTITUTION

The Facility's Permit to Operate may include Facility-wide Requirements as well as requirements that apply to specific permit units.

This Permit to Operate remains valid through the permit expiration date listed above, subject to payment of annual permit fees and compliance with permit conditions and all applicable local, state, and federal regulations. This permit is valid only at the location specified above, and becomes void upon any transfer of ownership or location. Any modification of the equipment or operation, as defined in District Rule 2201, will require prior District approval. This permit shall be posted as prescribed in District Rule 2010.

Seyed Sadredin
Executive Director / APCO

David Warner
Director of Permit Services

San Joaquin Valley Air Pollution Control District

FACILITY: C-954-0-1

EXPIRATION DATE: 08/31/2011

FACILITY-WIDE REQUIREMENTS

1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (3/21/02). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.12.1] Federally Enforceable Through Title V Permit
6. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
9. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name: PRISON INDUSTRY AUTHORITY-AVENAL
Location: 1 KINGS WAY, AVENAL, CA 93204
C-954-0-1, Mar 14 2007 8:18AM - HARRISR

10. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
13. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit
22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (11/15/01). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

23. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in the Table of Standards of District Rule 4601 (10/31/01) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. All VOC-containing materials for architectural coatings subject to Rule 4601 (10/31/01) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (10/31/01). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR 82, Subpart B. [40 CFR 82, Subpart B] Federally Enforceable Through Title V Permit
29. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8021 and 8011] Federally Enforceable Through Title V Permit
30. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8031 and 8011] Federally Enforceable Through Title V Permit
31. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8041 and 8011] Federally Enforceable Through Title V Permit
32. Whenever open areas are disturbed or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8051 and 8011] Federally Enforceable Through Title V Permit
33. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8061 and Rule 8011] Federally Enforceable Through Title V Permit
34. Any unpaved vehicle/equipment area that anticipates more than 75 vehicle trips per day shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 100 vehicle trips per day shall comply with the requirements of Section 5.1.2 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (11/15/01) or Rule 8011 (11/15/01). [District Rule 8071 and Rule 8011] Federally Enforceable Through Title V Permit
35. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit

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

36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), and Rule 111 (Kern, Tulare, Kings). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (11/15/01); 4601, sections 5.1, 5.2, 5.3, 5.8 and 8.0 (10/31/01); 8021 (11/15/01); 8031 (11/15/01); 8041 (11/15/01); 8051 (11/15/01); 8061 (11/15/01); and 8071 (11/15/01). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
42. On March 31, 2007, the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report are based upon this initial permit issuance date, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-954-1-3

EXPIRATION DATE: 08/31/2011

EQUIPMENT DESCRIPTION:

WOOD PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN, BINKS MODEL PFF-16-10-T-LH SPRAY PAINT BOOTH WITH EXHAUST FILTERS, AND VERID GUNWASHER MODEL 200-1 (COMMON WITH C-954-2)

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] 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 NSR Rule] Federally Enforceable Through Title V Permit
3. VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: clear topcoat 275 g/l (2.3 lb/gallon), filler 275 g/l (2.3 lb/gallon), high-solids stains 240 g/l (2.0 lb/gallon), ink 500 g/l (4.2 lb/gallon), mold-seal coating 750 g/l (6.3 lb/gallon), multi-colored coating 275 g/l (2.3 lb/gallon), pigmented coating 275 g/l (2.3 lb/gallon), sanding sealer 275 g/l (2.3 lb/gallon). [District Rule 4606] Federally Enforceable Through Title V Permit
4. VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: low-solids stain 120 g/l (1.0 lb/gallon), stripper 350 g/l (2.9 lb/gallon). [District Rule 4606] Federally Enforceable Through Title V Permit
5. VOC content of strippable booth coating shall not exceed 450 g/l (3.8 lb/gallon) as applied, excluding water and exempt compounds. [District Rule 4606] Federally Enforceable Through Title V Permit
6. Only HVLP, electrostatic, brush, dip, flow, or roll coating application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4606] Federally Enforceable Through Title V Permit
7. Permittee shall demonstrate that HVLP guns manufactured prior to 1/1/96 operate between 0.1 and 10 psig air atomizing pressure, by manufacturer's published technical material or by use of a certified air pressure tip gauge. [District Rule 4606] Federally Enforceable Through Title V Permit
8. All fresh or spent coatings, adhesives, catalysts, thinners and solvents shall be stored in closed containers. Solvent laden cloth or paper shall be stored and disposed in closed non-absorbent containers. [District Rule 4606] Federally Enforceable Through Title V Permit
9. Cleaning activities that use solvents with a VOC content greater than 50 g/l (0.42 lb/gallon) shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4606] 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.

10. Permittee shall not use materials with a VOC content greater than 50 g/l (0.42 lb/gallon) for spray equipment clean-up unless an enclosed system, or equipment proven to be equally effective at controlling emissions, is used for cleaning. [District Rule 4606]
11. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal), repair and maintenance cleaning (except, until June 30, 2005, cleaning of ultraviolet lamps used for the curing of ultraviolet ink or coatings): 50 g/l (0.42 lb/gal), and cleaning of coating application equipment: 550 g/l (4.6 lb/gal). [District Rule 4606] Federally Enforceable Through Title V Permit
12. The daily emissions from this booth shall not exceed 64.0 lb of VOC and 2.6 lb of PM10. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The combined weekly emissions from equipment operated under permits C-954-1 and C-954-2 shall not exceed 224 lb of VOC and 9.1 lb of PM10. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Permittee shall maintain daily records of the following: quantity and type of coatings and solvents used, mix ratios of volume of components added to each coating, volume of coatings applied, VOC content of each coating as applied, and VOC content of each solvent or stripper. [District Rule 4606] Federally Enforceable Through Title V Permit
15. Permittee shall keep the following records for solvent cleaning activities: manufacturers product data sheet or MSDS of solvents used, VOC content of solvents in g/l or lb/gal, and the type of cleaning activity for which each solvent is used. [District Rule 4606] Federally Enforceable Through Title V Permit
16. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4606] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-954-2-3

EXPIRATION DATE: 08/31/2011

EQUIPMENT DESCRIPTION:

WOOD PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN, BINKS MODEL PFF-16-10-T-LH SPRAY PAINT BOOTH WITH EXHAUST FILTERS AND VERID GUNWASHER MODEL 200-1 (COMMON WITH C-954-1) AND LOCATED IN BLDG #290, FURNITURE FACTORY

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] 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 NSR Rule] Federally Enforceable Through Title V Permit
3. VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: clear topcoat 275 g/l (2.3 lb/gallon), filler 275 g/l (2.3 lb/gallon), high-solids stains 240 g/l (2.0 lb/gallon), ink 500 g/l (4.2 lb/gallon), mold-seal coating 750 g/l (6.3 lb/gallon), multi-colored coating 275 g/l (2.3 lb/gallon), pigmented coating 275 g/l (2.3 lb/gallon), sanding sealer 275 g/l (2.3 lb/gallon). [District Rule 4606] Federally Enforceable Through Title V Permit
4. VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: low-solids stain 120 g/l (1.0 lb/gallon), stripper 350 g/l (2.9 lb/gallon). [District Rule 4606] Federally Enforceable Through Title V Permit
5. VOC content of strippable booth coating shall not exceed 450 g/l (3.8 lb/gallon) as applied, excluding water and exempt compounds. [District Rule 4606] Federally Enforceable Through Title V Permit
6. Only HVLP, electrostatic, brush, dip, flow, or roll coating application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4606] Federally Enforceable Through Title V Permit
7. Permittee shall demonstrate that HVLP guns manufactured prior to 1/1/96 operate between 0.1 and 10 psig air atomizing pressure, by manufacturer's published technical material or by use of a certified air pressure tip gauge. [District Rule 4606] Federally Enforceable Through Title V Permit
8. All fresh or spent coatings, adhesives, catalysts, thinners and solvents shall be stored in closed containers. Solvent laden cloth or paper shall be stored and disposed in closed non-absorbent containers. [District Rule 4606] Federally Enforceable Through Title V Permit
9. Cleaning activities that use solvents with a VOC content greater than 50 g/l (0.42 lb/gallon) shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4606] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

10. Permittee shall not use materials with a VOC content greater than 50 g/l (0.42 lb/gallon) for spray equipment clean-up unless an enclosed system, or equipment proven to be equally effective at controlling emissions, is used for cleaning. [District Rule 4606] Federally Enforceable Through Title V Permit
11. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal), repair and maintenance cleaning (except, until June 30, 2005, cleaning of ultraviolet lamps used for the curing of ultraviolet ink or coatings): 50 g/l (0.42 lb/gal), and cleaning of coating application equipment: 550 g/l (4.6 lb/gal). [District Rule 4606] Federally Enforceable Through Title V Permit
12. The daily emissions from this booth shall not exceed 64.0 lb of VOC and 2.6 lb of PM10. [District NSR Rule] Federally Enforceable Through Title V Permit
13. The combined weekly emissions from equipment operated under permits C-954-1 and C-954-2 shall not exceed 224 lb of VOC and 9.1 lb of PM10. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Permittee shall maintain daily records of the following: quantity and type of coatings and solvents used, mix ratios of volume of components added to each coating, volume of coatings applied, VOC content of each coating as applied, and VOC content of each solvent or stripper. [District Rule 4606] Federally Enforceable Through Title V Permit
15. Permittee shall keep the following records for solvent cleaning activities: manufacturers product data sheet or MSDS of solvents used, VOC content of solvents in g/l or lb/gal, and the type of cleaning activity for which each solvent is used. [District Rule 4606] Federally Enforceable Through Title V Permit
16. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4606] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-954-3-2

EXPIRATION DATE: 08/31/2011

EQUIPMENT DESCRIPTION:

WOOD FURNITURE FACTORY SERVED BY AN R.P. RICHARDS MODEL 12-216-3464 BAGHOUSE DUST COLLECTOR WITH REVERSE PULSED-JET CLEANING SYSTEM. LOCATED IN BLDG #290, FURNITURE FACTORY

PERMIT UNIT REQUIREMENTS

1. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] 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 NSR Rule] Federally Enforceable Through Title V Permit
4. The PM10 emissions rate shall not exceed 1.1 lb/day. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Records of dust collector maintenance, inspections, and repairs 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
6. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
7. Dust collection system shall be completely inspected annually for evidence of particulate matter breakthrough and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
8. 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 2520, 9.3.2] Federally Enforceable Through Title V Permit
9. Visible emissions from the dust collector shall be checked annually. 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
10. Replacement bag(s) 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

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-954-4-6

EXPIRATION DATE: 08/31/2011

EQUIPMENT DESCRIPTION:

POWDER COATING OPERATION CONSISTING OF POWDER COATING BOOTH, 1.8 MMBTU/HR DRY-OFF OVEN, 3.3 MMBTU/HR BAKE OVEN AND 0.34 MMBTU/HR CONTROLLED PYROLYSIS FURNACE WITH INTEGRAL AFTERBURNER FOR PARTS HANGER CLEANING

PERMIT UNIT REQUIREMENTS

1. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. Only PUC-regulated natural gas shall be used as fuel for the ovens and Controlled Pyrolysis burn-off furnace. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Emissions from the Controlled Pyrolysis burn-off furnace shall not exceed any of the following limits: 0.0271 lb-NOx/hr, 0.05 lb-CO/hr, 0.0174 lb-VOC/hr, 0.0133 lb-PM10, and 0.0018 lb-SOx/hr. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Emissions from the natural gas-fired ovens shall not exceed any of the following limits: 0.1 lb-NOx/MMBtu, 0.084 lb-CO/MMBtu, 0.0076 lb-PM10/MMBtu, 0.0055 lb-VOC/MMBtu, and 0.0006 lb-SOx/MMBtu. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Daily usage of powder coating shall not exceed 600 pounds. [District NSR Rule] Federally Enforceable Through Title V Permit
7. All coating shall be conducted in booth with filters in place and fan(s) operating. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Only electrostatic application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Powder coating material shall not contain VOC's. Manufacturer's Material Safety Data Sheets may be used to confirm the VOC content of the powder coating. [District NSR Rule and District Rule 4603] Federally Enforceable Through Title V Permit
10. Permittee shall maintain daily records of number of pounds of powder coating used. [District Rule 1070] Federally Enforceable Through Title V Permit
11. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
12. Operator shall maintain copies of fuel invoices. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
13. Visible emissions from the dust collector shall be checked annually. 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.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-954-10-2

EXPIRATION DATE: 08/31/2011

EQUIPMENT DESCRIPTION:

POWDER COATING OPERATION WITH ELECTROSTATIC APPLICATION EQUIPMENT, BOOTH WITH DRY FILTERS AND 0.75 MMBTU/HR NATURAL GAS-FIRED BATCH CURING OVEN

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Only PUC-regulated natural gas shall be used as fuel for the oven. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Daily usage of powder coating shall not exceed 319 pounds. [District NSR Rule] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule] Federally Enforceable Through Title V Permit
5. All coating shall be conducted in booth with filters in place and fan(s) operating. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Only electrostatic application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Powder coating material shall not contain VOC's. Manufacturer's Material Safety Data Sheets may be used to confirm the VOC content of the powder coating. [District NSR Rule and District Rule 4603] Federally Enforceable Through Title V Permit
8. Permittee shall maintain daily records of number of pounds of powder coating used. [District Rule 1070] Federally Enforceable Through Title V Permit
9. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
10. NOx emissions from the natural gas-fired oven shall not exceed 0.1 lb-NOx/MMBtu. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Operator shall maintain copies of fuel invoices. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
12. Visible emissions from the dust collector shall be checked annually. 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.

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-954-12-1

EXPIRATION DATE: 08/31/2011

EQUIPMENT DESCRIPTION:

1,250 HP CATERPILLAR MODEL 3412 STA DIESEL-FIRED EMERGENCY IC ENGINE POWERING A 800 KW ELECTRICAL GENERATOR.

PERMIT UNIT REQUIREMENTS

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 equipped with a positive crankcase ventilation (PCV) system that recirculates crankcase emissions into the air intake system for combustion. [District NSR Rule] Federally Enforceable Through Title V Permit
3. 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]
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 NSR Rule and District Rule 4801 and 17 CCR 93115] Federally Enforceable Through Title V Permit
6. NOx Emissions shall not exceed 5.91 g/hp-hr. [District NSR Rule] Federally Enforceable Through Title V Permit
7. The PM10 emissions rate shall not exceed 0.14 g/hp-hr. [District NSR Rule] Federally Enforceable Through Title V Permit
8. This engine shall be operated only for maintenance, testing, and 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 Rules 4701 and 4702, and 17 CCR 93115] Federally Enforceable Through Title V Permit
9. 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
10. During periods of 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 (e.g. oil pressure, exhaust gas temperature, etc.). [District Rule 4702] Federally Enforceable Through Title V Permit
11. 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, and the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.). 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 Rules 4702, 6.2 and 2520, 9.4.2 and 17 CCR 93115] Federally Enforceable Through Title V Permit
12. The permittee shall maintain monthly records of the type of fuel purchased, the amount of fuel purchased, date when the fuel was purchased, signature of the permittee who received the fuel, and signature of the fuel supplier indicating that the fuel was delivered. [District Rule 2520, 9.4.2 and 17 CCR 93115] 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. 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 Rules 4702, 6.2 and 2520, 9.4.2 and 17 CCR 93115] Federally Enforceable Through Title V Permit

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

Facility Name: PRISON INDUSTRY AUTHORITY-AVENAL

Location: 1 KINGS WAY, AVENAL, CA 93204

C-954-12-1 : Mar 14 2007 8:18AM - HARRISR

Attachment A – Detail Facility Printout

Attachment B – Exempt Equipment

The following exempt equipment was identified by the applicant on TVFORM-003, Insignificant Activities

Exemption Category	Rule 2020 Citation	✓
Structure or incinerator assoc. with a structure designed as a dwelling for 4 families or less	4.1	
Locomotives, airplanes, and watercraft used to transport passengers or freight	4.4	
Natural gas or LPG-fired boilers or other indirect heat transfer units of 5 MMBtu/hr or less	6.1.1	✓
Piston-type IC engine with maximum continuous rating of 50 braking horsepower (BHP) or less	6.1.2	
Gas turbine engines with maximum heat input rating of 3 MMBtu/hr or less	6.1.3	
Space heating equipment other than boilers	6.1.4	
Cooling towers with a circulation rate less than 10,000 gal/min, and that are not used for cooling of process water, or water from barometric jets or condensers++	6.2	
Use of less than 2 gal/day of graphic arts materials	6.3	
Equipment at retail establishments used to prepare food for human consumption	6.4.1	
Ovens at bakeries with total daily production less than 1,000 pounds and exempt by sec. 6.1.1	6.4.3	
Equipment used exclusively for extruding or compression molding of rubber or plastics, where no plastisizer or blowing agent is used	6.5	
Containers used to store clean produced water	6.6.1	
Containers \leq 100 bbl used to store oil with specific gravity \geq 0.8762	6.6.2	
Containers \leq 100 bbl installed prior to 6/1/89 used to store oil with specific gravity \geq 0.8762	6.6.3	
Containers with a capacity \leq 250 gallons used to store organic material where the actual storage temperature $<$ 150 F	6.6.4	
Containers used to store unheated organic material with an initial boiling point \geq 302 F	6.6.5	
Containers used to store fuel oils or non-air-blown asphalt with specific gravity \geq 0.9042	6.6.6	
Containers used to store petroleum distillates used as motor fuel with specific gravity \geq 0.8251	6.6.7	
Containers used to store refined lubricating oils	6.6.8	✓

Exemption Category	Rule 2020 Citation	✓
Unvented pressure vessels used exclusively to store liquefied gases or assoc with exempt equipment	6.6.9 or 6.13	
Portable tanks used exclusively to store produced fluids for ≤ six months	6.6.10	✓
Mobile transport tanks on delivery vehicles of VOCs	6.6.11	
Loading racks used for the transfer of less than 4,000 gal/day of unheated organic material with initial boiling point ≥ 302 F or of fuel oil with specific gravity ≥0.8251	6.7.1.1	
Loading racks used for the transfer of asphalt, crude or residual oil stored in exempt tanks, or crude oil with specific gravity ≥ 0.8762	6.7.1.2	
Equipment used exclusively for the transfer of refined lubricating oil	6.7.2	
Equipment used to apply architectural coatings	6.8.1	
Unheated, non-conveyorized cleaning equipment with < 10 ft ² open area; using solvents with initial boiling point ≥ 248 F; and < 25 gal/yr. evaporative losses	6.9	
Brazing, soldering, or welding equipment	6.10	
Equipment used to compress natural gas	6.11	
Fugitive emissions sources assoc. with exempt equipment	6.12	
Pits and Ponds as defined in Rule 1020	6.15	
On-site roadmix manufacturing and the application of roadmix as a road base material	6.17	
Emissions less than 2 lb/day from units not included above	6.19	
Venting PUC quality natural gas from for sole purpose of pipeline and compressor repair and or maintenance	7.2	
Non-structural repairs & maintenance to permitted equipment	7.3	✓
Detonation of explosives ≤ 100 lb/day and 1,000 lb/year	7.4	

Attachment C

PREVIOUS PERMITS TO OPERATE

San Joaquin Valley
Air Pollution Control District

FACILITY: C-954-0-0

EXPIRATION DATE: 08/31/2007

FACILITY-WIDE REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name: PRISON INDUSTRY AUTHORITY-AVENAL

Location: 1 KINGS WAY, AVENAL, CA 93204

C-954-0-0: Dec 11 2006 2:20PM - HARRISR

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-954-1-2

EXPIRATION DATE: 08/31/2007

EQUIPMENT DESCRIPTION:

WOOD PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN, BINKS MODEL PFF-16-10-T-LH SPRAY PAINT BOOTH WITH EXHAUST FILTERS, AND VERID GUNWASHER MODEL 200-1 (COMMON WITH C-954-2).

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
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]
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 NSR Rule]
4. Until 6/30/2005, VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: clear topcoat 550 g/l (4.6 lb/gallon), filler 500 g/l (4.2 lb/gallon), high-solids stains 700 g/l (5.8 lb/gallon), ink 500 g/l (4.2 lb/gallon), mold-seal coating 750 g/l (6.3 lb/gallon), multi-colored coating 275 g/l (2.3 lb/gallon), pigmented coating 550 g/l (4.6 lb/gallon), sanding sealer 550 g/l (4.6 lb/gallon). [District Rule 4606]
5. Effective 7/1/2005, VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: clear topcoat 275 g/l (2.3 lb/gallon), filler 275 g/l (2.3 lb/gallon), high-solids stains 240 g/l (2.0 lb/gallon), ink 500 g/l (4.2 lb/gallon), mold-seal coating 750 g/l (6.3 lb/gallon), multi-colored coating 275 g/l (2.3 lb/gallon), pigmented coating 275 g/l (2.3 lb/gallon), sanding sealer 275 g/l (2.3 lb/gallon). [District Rule 4606]
6. Until 6/30/2005, VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: low-solids stain 480 g/l (4.0 lb/gallon), stripper 350 g/l (2.9 lb/gallon). [District Rule 4606]
7. Effective 7/1/2005, VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: low-solids stain 120 g/l (1.0 lb/gallon), stripper 350 g/l (2.9 lb/gallon). [District Rule 4606]
8. VOC content of strippable booth coating shall not exceed 450 g/l (3.8 lb/gallon) as applied, excluding water and exempt compounds. [District Rule 4606]
9. Only HVLP, electrostatic, brush, dip, flow, or roll coating application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4606]
10. Permittee shall demonstrate that HVLP guns manufactured prior to 1/1/96 operate between 0.1 and 10 psig air atomizing pressure, by manufacturer's published technical material or by use of a certified air pressure tip gauge. [District Rule 4606]
11. All fresh or spent coatings, adhesives, catalysts, thinners and solvents shall be stored in closed containers. Solvent laden cloth or paper shall be stored and disposed in closed non-absorbent containers. [District Rule 4606]
12. Until 11/14/02, VOC content of solvents used for clean-up and surface preparation, excluding cleaning of coating application equipment, shall not exceed 200 g/l (1.67 lb/gallon). [District Rule 4606]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: PRISON INDUSTRY AUTHORITY-AVENAL

Location: 1 KINGS WAY, AVENAL, CA 93204

C-954-1-2 : Dec 11 2006 2:29PM - HARRISR

13. Until 11/14/02, no materials containing VOC shall be used for spray equipment clean-up unless an enclosed system or equipment proven to be equally effective is used for cleaning. VOC content of solvents used with an enclosed or approved cleaning system shall not exceed 950 g/l (7.9 lb/gallon) and solvent vapor pressure shall not exceed 35 mm Hg at standard conditions. [District Rule 4606]
14. Effective 11/15/02, cleaning activities that use solvents with a VOC content greater than 50 g/l (0.42 lb/gallon) shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4606]
15. Effective 11/15/02, the permittee shall not use materials with a VOC content greater than 50 g/l (0.42 lb/gallon) for spray equipment clean-up unless an enclosed system or equipment proven to be equally effective is used for cleaning. [District Rule 4606]
16. Effective 11/15/02 through 11/14/03, VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 70 g/l (0.58 lb/gal), repair and maintenance cleaning (except, until June 30, 2005, cleaning of ultraviolet lamps used for the curing of ultraviolet ink or coatings): 50 g/l (0.42 lb/gal), and cleaning of coating application equipment: 950 g/l (7.9 lb/gal) and solvent vapor pressure of 35 mm Hg at standard conditions. [District Rule 4606]
17. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal), repair and maintenance cleaning (except, until June 30, 2005, cleaning of ultraviolet lamps used for the curing of ultraviolet ink or coatings): 50 g/l (0.42 lb/gal), and cleaning of coating application equipment: 550 g/l (4.6 lb/gal). [District Rule 4606]
18. The daily emissions from this booth shall not exceed 64.0 lb of VOC and 2.6 lb of PM10. [District Rule 2201]
19. The combined weekly emissions from equipment operated under permits C-954-1 and C-954-2 shall not exceed 224 lb of VOC and 9.1 lb of PM10. [District Rule 2201]
20. Permittee shall maintain daily records of the following: quantity and type of coatings and solvents used, mix ratios of volume of components added to each coating, volume of coatings applied, VOC content of each coating as applied, and VOC content of each solvent or stripper. [District Rule 4606]
21. Effective 11/15/02, permittee shall keep the following records for solvent cleaning activities: manufacturers product data sheet or MSDS of solvents used, VOC content of solvents in g/l or lb/gal, and the type of cleaning activity for which each solvent is used. [District Rule 4606]
22. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4606]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-954-2-2

EXPIRATION DATE: 08/31/2007

EQUIPMENT DESCRIPTION:

WOOD PRODUCTS COATING OPERATION WITH HVLP SPRAY GUN, BINKS MODEL PFF-16-10-T-LH SPRAY PAINT BOOTH WITH EXHAUST FILTERS AND VERID GUNWASHER MODEL 200-1 (COMMON WITH C-954-1). (LOCATED IN BLDG #290, FURNITURE FACTORY).

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
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]
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 NSR Rule]
4. Until 6/30/2005, VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: clear topcoat 550 g/l (4.6 lb/gallon), filler 500 g/l (4.2 lb/gallon), high-solids stains 700 g/l (5.8 lb/gallon), ink 500 g/l (4.2 lb/gallon), mold-seal coating 750 g/l (6.3 lb/gallon), multi-colored coating 275 g/l (2.3 lb/gallon), pigmented coating 550 g/l (4.6 lb/gallon), sanding sealer 550 g/l (4.6 lb/gallon). [District Rule 4606]
5. Effective 7/1/2005, VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: clear topcoat 275 g/l (2.3 lb/gallon), filler 275 g/l (2.3 lb/gallon), high-solids stains 240 g/l (2.0 lb/gallon), ink 500 g/l (4.2 lb/gallon), mold-seal coating 750 g/l (6.3 lb/gallon), multi-colored coating 275 g/l (2.3 lb/gallon), pigmented coating 275 g/l (2.3 lb/gallon), sanding sealer 275 g/l (2.3 lb/gallon). [District Rule 4606]
6. Until 6/30/2005, VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: low-solids stain 480 g/l (4.0 lb/gallon), stripper 350 g/l (2.9 lb/gallon). [District Rule 4606]
7. Effective 7/1/2005, VOC content of coatings as applied, excluding water and exempt compounds, used for wood product, shall not exceed any of the following limits: low-solids stain 120 g/l (1.0 lb/gallon), stripper 350 g/l (2.9 lb/gallon). [District Rule 4606]
8. VOC content of strippable booth coating shall not exceed 450 g/l (3.8 lb/gallon) as applied, excluding water and exempt compounds. [District Rule 4606]
9. Only HVLP, electrostatic, brush, dip, flow, or roll coating application equipment shall be used, and the application equipment shall be operated in accordance with the manufacturer's recommendations. [District Rule 4606]
10. Permittee shall demonstrate that HVLP guns manufactured prior to 1/1/96 operate between 0.1 and 10 psig air atomizing pressure, by manufacturer's published technical material or by use of a certified air pressure tip gauge. [District Rule 4606]
11. All fresh or spent coatings, adhesives, catalysts, thinners and solvents shall be stored in closed containers. Solvent laden cloth or paper shall be stored and disposed in closed non-absorbent containers. [District Rule 4606]
12. Until 11/14/02, VOC content of solvents used for clean-up and surface preparation, excluding cleaning of coating application equipment, shall not exceed 200 g/l (1.67 lb/gallon). [District Rule 4606]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

Facility Name: PRISON INDUSTRY AUTHORITY-AVENAL

Location: 1 KINGS WAY, AVENAL, CA 93204

C-954-2-2; Dec 11 2006 2:29PM - HARRISR

13. Until 11/14/02, no materials containing VOC shall be used for spray equipment clean-up unless an enclosed system or equipment proven to be equally effective is used for cleaning. VOC content of solvents used with an enclosed or approved cleaning system shall not exceed 950 g/l (7.9 lb/gallon) and solvent vapor pressure shall not exceed 35 mm Hg at standard conditions. [District Rule 4606]
14. Effective 11/15/02, cleaning activities that use solvents with a VOC content greater than 50 g/l (0.42 lb/gallon) shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4606]
15. Effective 11/15/02, the permittee shall not use materials with a VOC content greater than 50 g/l (0.42 lb/gallon) for spray equipment clean-up unless an enclosed system or equipment proven to be equally effective is used for cleaning. [District Rule 4606]
16. Effective 11/15/02 through 11/14/03, VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 70 g/l (0.58 lb/gal), repair and maintenance cleaning (except, until June 30, 2005, cleaning of ultraviolet lamps used for the curing of ultraviolet ink or coatings): 50 g/l (0.42 lb/gal), and cleaning of coating application equipment: 950 g/l (7.9 lb/gal) and solvent vapor pressure of 35 mm Hg at standard conditions. [District Rule 4606]
17. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal), repair and maintenance cleaning (except, until June 30, 2005, cleaning of ultraviolet lamps used for the curing of ultraviolet ink or coatings): 50 g/l (0.42 lb/gal), and cleaning of coating application equipment: 550 g/l (4.6 lb/gal). [District Rule 4606]
18. The daily emissions from this booth shall not exceed 64.0 lb of VOC and 2.6 lb of PM10. [District Rule 2201]
19. The combined weekly emissions from equipment operated under permits C-954-1 and C-954-2 shall not exceed 224 lb of VOC and 9.1 lb of PM10. [District Rule 2201]
20. Permittee shall maintain daily records of the following: quantity and type of coatings and solvents used, mix ratios of volume of components added to each coating, volume of coatings applied, VOC content of each coating as applied, and VOC content of each solvent or stripper. [District Rule 4606]
21. Effective 11/15/02, permittee shall keep the following records for solvent cleaning activities: manufacturers product data sheet or MSDS of solvents used, VOC content of solvents in g/l or lb/gal, and the type of cleaning activity for which each solvent is used. [District Rule 4606]
22. Records shall be retained on-site for a minimum of five years and made available for District inspection upon request. [District Rule 4606]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-954-3-1

EXPIRATION DATE: 08/31/2007

EQUIPMENT DESCRIPTION:

430 HP WOOD FURNITURE FACTORY SERVED BY AN R.P. RICHARDS MODEL 12-216-3464 BAGHOUSE DUST COLLECTOR WITH REVERSE PULSED-JET CLEANING SYSTEM. LOCATED IN BLDG #290, FURNITURE FACTORY.

PERMIT UNIT REQUIREMENTS

1. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District NSR Rule]
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
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. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District NSR Rule]
5. The PM10 emissions rate shall not exceed 1.1 lb/day. [District Rule 2201]

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

Facility Name: PRISON INDUSTRY AUTHORITY-AVENAL

Location: 1 KINGS WAY, AVENAL, CA 93204

C-954-3-1 Dec 11 2006 2:29PM - HARRISR

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-954-4-5

EXPIRATION DATE: 08/31/2007

EQUIPMENT DESCRIPTION:

POWDER COATING OPERATION CONSISTING OF POWDER COATING BOOTH, 1.8 MMBTU/HR DRY-OFF OVEN, 3.3 MMBTU/HR BAKE OVEN AND 0.34 MMBTU/HR CONTROLLED PYROLYSIS FURNACE WITH INTEGRAL AFTERBURNER FOR PARTS HANGER CLEANING.

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]
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]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
4. Only PUC-quality natural gas shall be used as fuel for the ovens and Controlled Pyrolysis burn-off furnace. [District Rule 2201]
5. Visible emissions from the powder coating booth shall not exceed 5% opacity. [District Rule 2201]
6. Emissions from the Controlled Pyrolysis burn-off furnace shall not exceed any of the following limits: 0.0271 lb-NOx/hr, 0.05 lb-CO/hr, 0.0174 lb-VOC/hr, 0.0133 lb-PM10, and 0.0018 lb-SOx/hr. [District Rule 2201]
7. Emissions from the natural gas-fired ovens shall not exceed any of the following limits: 0.1 lb-NOx/MMBtu, 0.084 lb-CO/MMBtu, 0.0076 lb-PM10/MMBtu, 0.0055 lb-VOC/MMBtu, and 0.0006 lb-SOx/MMBtu. [District Rule 2201]
8. Daily usage of powder coating shall not exceed 600 pounds. [District Rule 2201]
9. Daily records of the number of pounds of powder coating used shall be maintained, retained for at least 2 years, and be made available for District inspection on request. [District Rule 1070]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-954-10-1

EXPIRATION DATE: 08/31/2007

EQUIPMENT DESCRIPTION:

POWDER COATING OPERATION WITH ELECTROSTATIC APPLICATION EQUIPMENT, BOOTH WITH DRY FILTERS AND 0.75 MMBTU/HR NATURAL GAS-FIRED BATCH CURING OVEN.

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
2. Only PUC-quality natural gas shall be used as fuel for the oven. [District Rule 2201]
3. No air contaminant shall be discharged into the atmosphere from the natural gas-fired ovens 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. Daily usage of powder coating shall not exceed 319 pounds. [District Rule 2201]
5. All fresh or spent solvents shall be stored in closed containers. Solvent laden cloth or paper shall be stored and disposed in closed non-absorbent containers. [District Rule 4603]
6. Until 11/14/02, VOC content of solvents used for clean-up and surface preparation, excluding cleaning of coating application equipment, shall not exceed 200 g/l (1.67 lb/gallon). [District Rule 4603]
7. Until 11/14/02, no materials containing VOC shall be used for spray equipment clean-up unless an enclosed system or equipment proven to be equally effective is used for cleaning. [District Rule 4603]
8. Effective 11/15/02, cleaning activities that use solvents with a VOC content greater than 50 g/l (0.42 lb/gallon) shall be performed by one or more of the following methods: wipe cleaning; application of solvent from hand-held spray bottles from which solvents are dispensed without a propellant-induced force; non-atomized solvent flow method in which the cleaning solvent is collected in a container or a collection system which is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container; or solvent flushing method in which the cleaning solvent is discharged into a container that is closed except for solvent collection openings and, if necessary, openings to avoid excessive pressure build-up inside the container. The discharged solvent from the equipment must be collected into containers without atomizing into the open air. The solvent may be flushed through the system by air or hydraulic pressure, or by pumping. [District Rule 4603]
9. Effective 11/15/02, the permittee shall not use materials with a VOC content greater than 50 g/l (0.42 lb/gallon) for spray equipment clean-up unless an enclosed system or equipment proven to be equally effective is used for cleaning. [District Rule 4603]
10. Effective 11/15/02 through 11/14/03, VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 70 g/l (0.58 lb/gal), repair and maintenance cleaning (except, until June 30, 2005, cleaning of ultraviolet lamps used for the curing of ultraviolet coatings): 50 g/l (0.42 lb/gal), and cleaning of coating application equipment: 950 g/l (7.9 lb/gal) and solvent vapor pressure of 35 mm Hg at standard conditions. [District Rule 4603]
11. VOC content of solvents used shall not exceed any of the following limits: product cleaning during manufacturing process or surface preparation for coating application: 50 g/l (0.42 lb/gal), repair and maintenance cleaning (except, until June 30, 2005, cleaning of ultraviolet lamps used for the curing of ultraviolet coatings): 50 g/l (0.42 lb/gal), and cleaning of coating application equipment: 550 g/l (4.6 lb/gal). [District Rule 4603]

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

12. Permittee shall maintain daily records of the VOC content of each solvent. [District Rule 4603]
13. Effective 11/15/02 permittee shall keep the following records for solvent cleaning activities: manufacturers product data sheet or MSDS of solvents used, VOC content of solvents in g/l or lb/gal, and the type of cleaning activity for which each solvent is used. [District Rule 4603]
14. Records shall be retained on-site for a minimum of two years and made available for District inspection upon request. [District Rule 4603]
15. NOx emissions from the natural gas-fired oven shall not exceed 0.1 lb-NOx/MMBtu. [District Rule 2201]

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

Facility Name: PRISON INDUSTRY AUTHORITY-AVENAL

Location: 1 KINGS WAY, AVENAL, CA 93204

C-954-10-1 - Dec 11 2008 2:29PM - HARRISR

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-954-12-0

EXPIRATION DATE: 08/31/2007

EQUIPMENT DESCRIPTION:

1,250 HP CATERPILLAR MODEL 3412 STA DIESEL-FIRED EMERGENCY IC ENGINE POWERING A 800 KW ELECTRICAL GENERATOR.

PERMIT UNIT REQUIREMENTS

1. 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]
2. This engine shall be equipped with either a positive crankcase ventilation (PCV) system that recirculates crankcase emissions into the air intake system for combustion, or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201]
3. The exhaust stack shall not be fitted with a rain cap or similar device that would impede vertical exhaust flow. [District Rule 4102]
4. The sulfur content of the diesel fuel used shall not exceed 0.05% by weight. [District Rule 2201]
5. The engine shall be operated only for maintenance, testing, and required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 200 hours per year. [District Rules 2201 and 4701]
6. NOx Emissions shall not exceed 5.91 g/hp-hr. [District Rule 2201]
7. The PM10 emissions rate shall not exceed 0.14 g/hp-hr. [District Rule 2201]
8. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
9. The permittee shall maintain records of hours of emergency and non-emergency operation. Records shall include the date, the number of hours of operation, the purpose of the operation (e.g., load testing, weekly testing, rolling blackout, general area power outage, etc.), and the sulfur content of the diesel fuel used. Such records shall be retained on-site for a period of at least two years and made available for District inspection upon request. [District Rule 1070]

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

Facility Name: PRISON INDUSTRY AUTHORITY-AVENAL

Location: 1 KINGS WAY, AVENAL, CA 93204

C-954-12-0 Doc 11 2006 2:30PM - HARRISR

Attachment D – EPA Comments

EPA comments received on January 25, 2007 on proposed Title V permit renewal for Prison Industry Authority-Avenal, Facility ID # C-954, Project # C-1060792

Permit Unit C-954-3

Comment 1: This permit unit includes a baghouse, which is subject to the requirements of Rule 4101 Visible Emissions. The permit must be revised to include a requirement for periodic monitoring of VE and corrective action to be taken if VE are observed. Conditions which contain the same type of requirements in other District baghouses should be sufficient.

District Response: The following condition is being added to address the requirement for periodic monitoring of VE and corrective action to be taken if VE are observed:

- Visible emissions from the dust collector shall be checked annually. 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]

Comment 2: Condition 5 requires the source to keep records of dust collector maintenance, inspections, and repairs. However the permit does not contain any requirement to perform any of these activities. A condition requiring the source to perform these activities on a periodic basis should be added to this permit. EPA also suggests adding a condition to require that at least one spare dust collector bag be maintained on-site, so the repairs can be made in a timely manner.

District Response: District agrees and the following conditions have been added:

- Dust collection system shall be completely inspected annually for evidence of particulate matter breakthrough and repaired as needed. [District Rule 2520, 9.3.2]
- 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 2520, 9.3.2]
- Replacement bag(s) numbering at least 10% of the total number of bags in the baghouse shall be maintained on the premises. [District Rule 2201]

Permit Unit C-954-4 & 10

Comment 1: Conditions 3 and 2 (respectively) requires the source to only burn PUC quality natural gas, but does not contain any requirement to maintain records of fuel delivery or quality. Please add an appropriate recordkeeping condition. Since it appears this condition is required for both permit units, the recordkeeping condition could be added to the facility-wide portion of the Title V permit.

District Response: The following condition has been added to both permit units:

- Operator shall maintain copies of fuel invoices. [District Rule 2520, 9.4.2]*

Comment 2: Condition 4 for Unit 4, limits VE to less than 5% opacity. EPA notes that Unit 10 does not have any VE limits. Please add a VE limit to the Unit 10 permit and a requirement to perform periodic monitoring of VE for both permits, and corrective action to be taken if any VE is observed.

District Response: The condition for VE limited to less than 5% opacity has been removed and replaced with condition 22 on the facility-wide permit C-954-0-0, while the requirement to perform periodic monitoring of VE, and corrective action to be taken if any VE is observed is being added to both permits. The following correct VE limit condition can be found on the facility-wide permit, while the monitoring and corrective action condition for VE has been added to both permits C-954-4 and C-954-10:

C-954-0-0:

- No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (11/15/01). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)]

C-954-4:

- Visible emissions from the powder coating booth shall be checked annually. 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]

* The facility shall have noted on all fuel invoices "PUC-regulated gas from PG&E."

C-954-10:

- Visible emissions from the powder coating booth shall be checked annually. 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]

Permit Unit C-954-12

Comment 1: Condition 2 requires the engine to be equipped with either a PCV system or a crankcase emission control device of at least 90% control efficiency. Since the emission unit is already in operation, please revise the condition to specify which of the compliance options is being used for this emission unit.

District Response: District has determined that this engine does have a positive crankcase ventilation (PCV); therefore, the condition will be change as follows:

- This engine shall be equipped with ~~either~~ a positive crankcase ventilation (PCV) system that recirculates crankcase emissions into the air intake system for combustion. [District NSR Rule]

Comment 2: Condition 5 specifies a sulfur content limit for the diesel fuel. Condition 12 requires records to be maintained of the amount and type of fuel purchased. Please add additional language to require the records to include information regarding the sulfur content of the fuel, so compliance with Condition 5 can be determined.

District Response: Condition 5 is a general condition. Only commercial diesel fuel with sulfur content mentioned in condition 5 can be purchased in the State of California. There is no other commercially sold diesel fuel with a sulfur content different from this; therefore, Condition 12 will remain the same.