San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT

HEALTHY AIR LIVING™

JUL 29 2013

Mr. Michael Gibbons
Saint-Gobain Containers, Inc.
P.O. Box 4200
Muncie, IN 47307-4200

Re: Proposed Authority to Construct/Certificate of Conformity (Minor Mod)
District Facility # C-801
Project # C-1131833

Dear Mr. Gibbons:

Enclosed for your review is the District's analysis of an application for Authority to Construct for the facility identified above. You requested that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. The proposal is to replace the existing Donaldson Modular Torit (54 MBT 8) dust collector listed on permit C-801-43-3 with a Mac Process Model 120LST81 dust collector.

After addressing all comments made during the 45-day EPA comment period, the District intends to issue the Authority to Construct with a Certificate of Conformity. Prior to operating with modifications authorized by the Authority to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

If you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Thank you for your cooperation in this matter.

Sincerely,

David Warner
Director of Permit Services

Enclosures

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

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San Joaquin Valley Air Pollution Control District

Authority to Construct Application Review

Container Glass Production Facility

Facility Name:	Saint-Gobain Containers, Inc.	Date:	July 19, 2013
Mailing Address:	P.O. Box 4200 Muncie, IN 47307-4200	Engineer:	Stanley Tom
		Lead Engineer:	Joven Refuerzo
Contact Person:	Michael Gibbons		
Telephone:	(559) 675-4726		
Application #:	C-801-43-5		
Project #:	C-1131833		
Complete:	June 13, 2013		

I. Proposal

Saint-Gobain Containers, Inc. (Saint-Gobain) operates a container glass manufacturing facility in Madera, CA. Saint-Gobain proposes to replace the existing Donaldson Modular Torit (54 MBT 8) dust collector listed on permit C-801-43-3 (see Attachment A) with a Mac Process Model 120LST81 dust collector. No modification is proposed to the furnace, therefore Rule 4354 discussion is not required.

Saint-Gobain has received their Title V Permit. This modification can be classified as a Title V minor modification pursuant to Rule 2520, and can be processed with a Certificate of Conformity (COC). Since the facility has specifically requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct. Saint-Gobain must apply to administratively amend their Title V permit.

II. Applicable Rules

Rule 2201 New and Modified Stationary Source Review Rule (April 21, 2011)
Rule 2410 Prevention of Significant Deterioration (June 16, 2011)
Rule 2520 Federally Mandated Operating Permits (June 21, 2001)
Rule 4101 Visible Emissions (February 17, 2005)
Rule 4102 Nuisance (December 17, 1992)
Rule 4201 Particulate Matter – Concentration (December 17, 1992)
Rule 4202 Particulate Matter – Emission Rate (December 17, 1992)
CH&SC 41700 California Health & Safety Code, Sec 41700, Health Risk Assessment
CH&SC 42301 California Health & Safety Code, Sec 42301.6, School Notice
Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)
California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines

III. Project Location

This facility is located at 24441 Avenue 12 at Road 24 ½ in Madera, CA. The facility is not located within 1,000 feet of any K-12 school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

IV. Process Description

The facility manufactures container glass from the following main ingredients: silica sand, soda ash, limestone, cullet (recycled glass), and salt cake. The equipment in this project involves the operations of weighing and mixing the raw glass production.

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

The facility operates 24 hours per day, 365 days per year.

V. Equipment Listing

Pre-Project Equipment Description

Current Permit #	Pre-Project Equipment Description
C-801-43-3	NORTH SIDE CONVEYOR ACCEPTING TRANSFER OF BATCH AND CULLET TO FURNACE #1 AND CULLET WEIGHING CONVEYOR SERVED BY DONALDSON MODULAR TORIT (54 MBT 8)

Proposed Modification

Current Permit #	ATC Equipment Description
C-801-43-5	MODIFICATION OF NORTH SIDE CONVEYOR ACCEPTING TRANSFER OF BATCH AND CULLET TO FURNACE #1 AND CULLET WEIGHING CONVEYOR SERVED BY DONALDSON MODULAR TORIT (54 MBT 8): REPLACE EXISTING DONALDSON MODULAR TORIT (54 MBT 8) DUST COLLECTOR WITH MAC PROCESS MODEL 120LST81 DUST COLLECTOR

Post-Project Equipment Description

Current Permit #	Post-Project Equipment Description
C-801-43-5	NORTH SIDE CONVEYOR ACCEPTING TRANSFER OF BATCH AND CULLET TO FURNACE #1 AND CULLET WEIGHING CONVEYOR SERVED BY MAC PROCESS MODEL 120LST81 DUST COLLECTOR

VI. Emission Control Technology Evaluation

PM_{10} is the pollutant of concern emitted from the material handling operation. The PM_{10} emissions are controlled with a baghouse dust collector and cartridge filters. According to the vendor, the MAC Process Model 120LST81 dust collector has a PM control efficiency of 99.9%.

Design check calculations

Air Flow Calculations for the new dust collector

MAC Process Model 120LST81 pulse jet dust collector

Airflow: 5,400 ft^3/min (per Applicant)
Air/Cloth Ratio: = Air Flow Rate ÷ Cloth Area
= 5,400 cfm ÷ 1,274 ft^2 = 4.2 ft/min

The pulse jet cleaning mechanism uses a high pressure jet of air to remove the dust from the bags. The dust cake is removed from the bag by a blast of compressed air injected into the top of the bag tube. The air blast causes the bag to flex or expand as the shock wave travels down the bag tube. As the bag tube flexes, the dust cake fractures and deposited particulates are discharged from the bag. Pulse jet baghouses are generally designed with air-to-cloth ratio (filtering velocity) between 5 and 15 ft/min.

The calculated air/cloth ratio is lower than the typical range. However the baghouse manufacturer and the operator described this piece of equipment as a high efficiency dust collector, and the facility has assured that this baghouse is appropriate for their operation.

VII. General Calculations

A. Assumptions

- Facility operates 24 hours per day, 365 days per year (per Applicant)
- PM_{10} is the only pollutant of concern in this project
- Each baghouse dust collector has a PM_{10} control efficiency of 99.9% (per manufacturer)
- 50% of PM is PM10 (Rule 2201 Section 4.11.2)
- The Donaldson Modular Torit (54 MBT 8) dust collector has an air flow rate of 3,000 cfm (per manufacturer, pre-project)
- The MAC Process Model 120LST81 dust collector has an air flow rate of 5,400 cfm (per manufacturer, post-project)

B. Emission Factors

Pre-Project Emission Factor

Emission Factor		
Permit Unit	gr-PM/dscf	Source
C-801-43-3	0.0001	Manufacturer guarantee

Post-Project Emission Factor

Emission Factor		
Permit Unit	gr-PM/dscf	Source
C-801-43-5	0.0001	Manufacturer guarantee

C. Calculations

1. Pre-Project Potential to Emit (PE1)

PE1 = 0.0001 gr/dscf ÷ 7,000 gr/lb x 3,000 (ft^3/min) x 1,440 min/day
= 0.1 lb-PM_{10}/day → 0 lb-PM10/day*

PE1 = 0.0001 gr/dscf ÷ 7,000 gr/lb x 3,000 (ft^3/min) x 1,440 min/day x 365 days/yr
= 23 lb-PM_{10}/year

2. Post Project Potential to Emit (PE2)

PE2 = 0.0001 gr/dscf ÷ 7,000 gr/lb x 5,400 (ft^3/min) x 1,440 min/day
= 0.1 lb-PM_{10}/day → 0 lb-PM10/day*

PE2 = 0.0001 gr/dscf ÷ 7,000 gr/lb x 5,400 (ft^3/min) x 1,440 min/day x 365 days/yr
= 41 lb-PM_{10}/year

* Per District Policy APR 1130, District policy is to consider an IPE of less than 0.5 lb/day to be rounded to zero for the purposes of triggering NSR requirements and therefore the requirements are not triggered. However, to minimize rounding errors, DELs, SSPE, PE and all other associated figures will be reflected in the EE and the permits without setting a daily increase in emissions of less than 0.5 lb/day to zero.

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

Pursuant to District Rule 2201, the Pre-Project Stationary Source Potential to Emit (SSPE1) is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.

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

Pre-Project Stationary Source Potential to Emit [SSPE1] (lb/year)					
	NO_X	SO_X	PM_{10}	CO	VOC
Pre-Project SSPE (SSPE1)	> 20,000	> 140,000	> 140,000	> 200,000	> 20,000

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

Pursuant to District Rule 2201, the Post Project Stationary Source Potential to Emit (SSPE2) is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site. The Post Project Stationary Source Potential to Emit (SSPE2) is summarized below:

Post-Project Stationary Source Potential to Emit [SSPE2] (lb/year)					
	NO_X	SO_X	PM_{10}	CO	VOC
Post-Project SSPE (SSPE2)	> 20,000	> 140,000	> 140,000	> 200,000	> 20,000

5. Major Source Determination

Rule 2201 Major Source Determination

Pursuant to District Rule 2201, a Major Source is a stationary source with a SSPE2 equal to or exceeding one or more of the following threshold values. For the purposes of determining major source status the following shall not be included:

- any ERCs associated with the stationary source
- Emissions from non-road IC engines (i.e. IC engines at a particular site at the facility for less than 12 months)
- Fugitive emissions, except for the specific source categories specified in 40 CFR 51.165

Major Source Determination (lb/year)					
	NO_X	SO_X	PM_{10}	CO	VOC
Pre-Project SSPE (SSPE1)	> 20,000	> 140,000	> 140,000	> 200,000	> 20,000
Post Project SSPE (SSPE2)	> 20,000	> 140,000	> 140,000	> 200,000	> 20,000
Major Source Threshold	20,000	140,000	140,000	200,000	20,000
Major Source?	Yes	Yes	Yes	Yes	Yes

The source is an existing Major Source for NO_X, SO_X, PM10, CO, and VOC and will remain a Major Source for these pollutants.

Rule 2410 Major Source Determination

The facility or the equipment evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21 (b)(1)(i). Therefore the following PSD Major Source thresholds are applicable.

PSD Major Source Determination (tons/year)	
	CO2e
Estimated Facility PE before Project Increase	> 125,762
PSD Major Source Thresholds	100,000
PSD Major Source ? (Y/N)	Y

GHG Calculations

The following table summarizes the external combustion equipment at the facility.

Permit	Equipment	Rating
C-801-1-13	Glass Furnace	75 MMBtu/hr
C-801-2-10	Glass Furnace	85 MMBtu/hr
C-801-19-3	Distributor	10 MMBtu/hr
C-801-20-3	Lehr	7.0 MMBtu/hr
C-801-21-3	Lehr	12.0 MMBtu/hr
C-801-22-2	Forehearth	3.0 MMBtu/hr
C-801-23-2	Forehearth	3.0 MMBtu/hr
C-801-24-2	Forehearth	4.0 MMBtu/hr
C-801-25-3	Forehearth	3.0 MMBtu/hr
C-801-26-1	Distributor	9.9 MMBtu/hr
C-801-27-1	Forehearth	4.3 MMBtu/hr
C-801-28-1	Forehearth	2.7 MMBtu/hr
C-801-29-1	Forehearth	4.3 MMBtu/hr
C-801-30-1	Lehr	5.0 MMBtu/hr
C-801-31-1	Lehr	5.0 MMBtu/hr
C-801-32-1	Lehr	5.0 MMBtu/hr
C-801-33-1	Fire Polishing Operation	3.6 MMBtu/hr
C-801-34-1	Fire Polishing Operation	3.6 MMBtu/hr
Total		245.4 MMBtu/hr

Basis and Assumptions

- Emission factors and global warming potentials (GWP) are taken from EPA 40 CFR Part 98, Subpart A, Tables C-1 and C-2:

Natural Gas
CO2 53.02 kg/MMBtu (116.89 lb/MMBtu)
CH4 1.0×10^{-3} kg/MMBtu (0.0022 lb/MMBtu)
N2O 1.0×10^{-4} kg/MMBtu (0.00022 lb/MMBtu)

GWP for CH4 = 21 lb-CO2(eq) per lb-CH4
GWP for N2O = 310 lb-CO2(eq) per lb-N2O

Calculations

Annual Emissions (External Combustion)

CO2 Emissions = 245.4 MMBtu/hr x 116.89 lb/MMBtu x 8,760 hours/year
= 251,278,901 lb-CO2(eq)/year
CH4 Emissions = 245.4 MMBtu/hr x 0.0022 lb/MMBtu x 8,760 hours/year
21 lb-CO2(eq) per lb-CH4
= 99,316.3 lb-CO2(eq)/year
N2O Emissions = 245.4 MMBtu/hr x 0.00022 lb/MMBtu x 8,760 hours/year
310 lb-CO2(eq) per lb-N2O
= 146,609.8 lb-CO2(eq)/year

Total = 251,278,901 + 99,316.3 + 146,609.8 = 251,524,827 lb-CO2(eq)/year
Total = 251,524,827 lb-CO2(eq)/year ÷ 2,000 lb/ton = **125,762 short tons-CO2(eq)/year**

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

6. Baseline Emissions (BE)

BE = Pre-project Potential to Emit for:

- Any unit located at a non-major source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, located at a Major Source

otherwise,

BE = Historic Actual Emissions (HAE), calculated pursuant to Rule 2201

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

The emission unit in this project is served by a dust collector, which has PM_{10} control efficiency of 99% or greater. Therefore, Baseline Emissions (BE) are equal to the Pre-Project Potential to Emit (PE1).

7. SB 288 Major Modification

SB 288 Major Modification is defined in 40 CFR Part 51.165 as "*any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act.*"

As discussed in Section VII.C.5 above, the facility is an existing Major Source for PM10; however, the project by itself would need to be a significant increase in order to trigger a SB 288 Major Modification. The emissions units within this project do not have a total potential to emit which is greater than SB 288 Major Modification thresholds (see table below). Therefore, the project cannot be a significant increase and the project does not constitute a SB 288 Major Modification.

Major Modification Thresholds (Existing Major Source)			
Pollutant	Project PE (lb/year)	Threshold (lb/year)	Major Modification?
PM_{10}	41	30,000	No

8. Federal Major Modification

District Rule 2201 states that major modifications are also federal major modifications, unless they qualify for either a "Less-Than-Significant Emissions Increase" exclusion or a "Plantwide Applicability Limit" (PAL) exclusion.

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

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

Significant Threshold (lb/year)	
Pollutant	Threshold (lb/year)
VOC	0
NO_x	0
PM_{10}	30,000
SO_x	80,000

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

Net Emission Increase for Existing Units (NEI_E)

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

$NEI_E = PE2_E - BAE$

The emissions unit in this project only emits particulate matter; therefore only PM_{10} calculations are required.

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

NEI_E (PM_{10}) = 41 lb/year

NEI (PM_{10}) = 41 lb/year

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

9. Rule 2410 – Prevention of Significant Deterioration (PSD) Applicability Determination

Rule 2410 applies to pollutants for which the District is in attainment or for unclasssified, pollutants. The pollutants addressed in the PSD applicability determination are listed as follows:

- NO2 (as a primary pollutant)
- SO2 (as a primary pollutant)
- CO
- PM
- PM10
- Greenhouse gases (GHG): CO2, N2O, CH4, HFCs, PFCs, and SF6

The first step of this PSD evaluation consists of determining whether the facility is an existing PSD Major Source or not (See Section VII.C.5 of this document).

In the case the facility is an existing PSD Major Source, the second step of the PSD evaluation is to determine if the project results in a PSD significant increase.

In the case the facility is NOT an existing PSD Major Source but is an existing source, the second step of the PSD evaluation is to determine if the project, by itself, would be a PSD major source.

In the case the facility is new source, the second step of the PSD evaluation is to determine if this new facility will become a new PSD Major Source as a result of the project and if so, to determine which pollutant will result in a PSD significant increase.

I. Project Location Relative to Class 1 Area

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

II. Significance of Project Emission Increase Determination

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

As a screening tool, the potential to emit from all new and modified units is compared to the PSD significant emission increase thresholds, and if total potential to emit from all new and modified units is below this threshold, no further analysis will be needed.

PSD Significant Emission Increase Determination: Potential to Emit (tons/year)						
	NO2	SO2	CO	PM	PM10	CO2e
Total PE from New and Modified Units	0	0	0	0.02	0.02	0
PSD Significant Emission Increase Thresholds	40	40	100	25	15	75,000
PSD Significant Emission Increase?	N	N	N	N	N	N

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

10. Quarterly Net Emissions Change (QNEC)

The QNEC is calculated solely to establish emissions that are used to complete the District's PAS emissions profile screen. Detailed QNEC calculations are included in Attachment B.

VIII. Compliance

Rule 2201 New and Modified Stationary Source Review Rule

A. Best Available Control Technology (BACT)

1. BACT Applicability

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis for the following*:

a) Any new emissions unit with a potential to emit exceeding two pounds per day,
b) The relocation from one Stationary Source to another of an existing emissions unit with a potential to emit exceeding two pounds per day,
c) Modifications to an existing emissions unit with a valid Permit to Operate resulting in an AIPE exceeding two pounds per day, and/or
d) Any new or modified emissions unit, in a stationary source project, which results in a Major Modification.

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

a. New Emissions units with PE > 2 lb/day

As discussed in Section I above, there are no new emissions units associated with this project; therefore BACT for new units with PE > 2 lb/day purposes is not triggered.

b. Relocation of emissions with PE > 2 lb/day

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

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

For modified emissions units, the AIPE can be calculated as follows:

AIPE = PE2 – HAPE

Where,
AIPE = Adjusted Increase in Permitted Emissions, (lb/day)
PE2 = Post-Project Potential to Emit, (lb/day)
HAPE = Historically Adjusted Potential to Emit, (lb/day)

HAPE = PE1 x (EF2/EF1)

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

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

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

AIPE = PE2 – (PE1 x (EF2 / EF1))

There are no emission factor changes in this project. Therefore, EF2 / EF1 = 1.

AIPE = 0.1 – (0.1 * (1))
= 0.1 – 0.1 * 1
= 0.0 lb-PM_{10}/day

As demonstrated above, the AIPE is not greater than 2 lb/day for PM_{10} emissions; therefore BACT is not triggered.

d. SB 288/Federal Major Modification

As discussed in Section VII.C.7 and VII.C.8 above, this project does not constitute a SB288 and/or Federal Major Modification; therefore BACT is not triggered.

B. Offsets

1. Offset Applicability

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

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

Offset Applicability (lb/year)					
	NO_X	SO_X	PM_{10}	CO	VOC
Post Project SSPE (SSPE2)	> 20,000	> 140,000	> 140,000	> 200,000	> 20,000
Offset Threshold	20,000	54,750	29,200	200,000	20,000
Offsets Triggered?	Yes	Yes	Yes	Yes	Yes

2. Quantity of Offsets Required

PM_{10} is the only pollutant of concern in this project. Therefore, calculations for only PM_{10} emissions are required.

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

Offsets Required (lb/year) = (Σ[PE2 - BE] + ICCE) X DOR, for all new or modified emissions units in the project

where:
PE2 = Post-project Potential to Emit (lb/year)
BE = Baseline Emissions (lb/year)
ICCE = Increase in Cargo Carrier Emissions (lb/year)
DOR = Distance Offset Ratio, determined pursuant to Rule 2201

BE = Pre-project Potential to Emit for:

- Any unit located at a non-major source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, located at a Major Source

otherwise,

BE = Historic Actual Emissions (HAE)

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

Offsets Required (lb/year) = ([PE2 – BE] + ICCE) x DOR

PE2 (PM_{10}) = 41 lb/year
BE (PM_{10}) = 23 lb/year
ICCE = 0 lb/year

Offsets Required (lb/year) = ([41 – 23] + 0) x DOR
= 18 lb PM_{10}/year → 0* lb PM_{10}/year x DOR

* Per District Policy APR 1130, District policy is to consider an IPE of less than 0.5 lb/day to be rounded to zero for the purposes of triggering NSR requirements. Therefore, offsets are not required for this project.

C. Public Notification

1. Applicability

Public noticing is required for:

a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications,
b. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,
c. Any project which results in the offset thresholds being surpassed, and/or
d. Any project with an SSIPE of greater than 20,000 lb/year for any pollutant.

a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications

New Major Sources are new facilities, which are also Major Sources. Since this is not a new facility, public noticing is not required for this project for New Major Source purposes.

As demonstrated in Sections VII.C.7 and VII.C.8, this project does not constitute an SB 288 or Federal Major Modification; therefore, public noticing for SB 288 or Federal Major Modification purposes is not required.

b. PE > 100 lb/day

Applications which include a new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any pollutant will trigger public noticing requirements. As seen in Section VII.C.2 above, this project does not include a new emissions unit which has daily emissions greater than 100 lb/day for any pollutant, therefore public noticing for PE > 100 lb/day purposes is not required.

c. Offset Threshold

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

Offset Threshold				
Pollutant	SSPE1 (lb/year)	SSPE2 (lb/year)	Offset Threshold	Public Notice Required?
NO_X	> 20,000	> 20,000	20,000 lb/year	No
SO_X	> 54,750	> 54,750	54,750 lb/year	No
PM_{10}	> 29,200	> 29,200	29,200 lb/year	No
CO	> 200,000	> 200,000	200,000 lb/year	No
VOC	> 20,000	> 20,000	20,000 lb/year	No

As detailed above, there were no thresholds surpassed with this project; therefore public noticing is not required for offset purposes.

d. SSIPE > 20,000 lb/year

Public notification is required for any permitting action that results in a SSIPE of more than 20,000 lb/year of any affected pollutant. According to District policy, the SSIPE = SSPE2 – SSPE1. The SSIPE is compared to the SSIPE Public Notice thresholds in the following table.

Stationary Source Increase in Permitted Emissions [SSIPE] – Public Notice				
Pollutant	Project PE2 (lb/year)	Project PE1 (lb/year)	SSIPE	Public Notice Required?
NO_X	0	0	0	No
SO_X	0	0	0	No
PM_{10}	41	23	18	No
CO	0	0	0	No
VOC	0	0	0	No

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

2. Public Notice Action

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

D. Daily Emission Limits (DELs)

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

Proposed Rule 2201 (DEL) Condition

- Controlled PM10 emissions from the dust collector shall not exceed 0.0001 gr/scf. [District Rule 2201]

E. Compliance Assurance

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

1. Source Testing

As stated in District Policy APR 1705, non-combustion equipment served by a baghouse with expected PM_{10} emissions of 30 pounds per day or greater must be tested upon initial start-up. Units with PM_{10} emissions in excess of 70 pounds per day should also be tested on annual basis.

As shown in the calculation section above, all equipment have PM_{10} emissions below the above levels. Therefore, pursuant to District Policy APR 1705, source testing is not required to demonstrate compliance with Rule 2201.

2. Monitoring

No monitoring is required to demonstrate compliance with Rule 2201.

3. Recordkeeping

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

- Differential operating pressure for each baghouse shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201]
- Records of all maintenance of each baghouse, including all change outs of filter media, shall be maintained. [District Rule 2201]
- Records of daily production of mixed batch material shall be maintained and made available for District inspection upon request. [District Rules 1070 and 2520]
- Records of dust collector maintenance, inspections, and repair for each baghouse 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]

4. Reporting

No reporting is required to demonstrate compliance with Rule 2201.

Rule 2410 Prevention of Significant Deterioration

The prevention of significant deterioration (PSD) program is a construction permitting program for new major stationary sources and major modifications to existing major stationary sources located in areas classified as attainment or in areas that are unclassifiable for any criteria air pollutant.

As demonstrated above, this project is not subject to the requirements of Rule 2410 due to a significant emission increase and no further discussion is required.

Rule 2520 Federally Mandated Operating Permit

This facility is subject to this Rule, and has received their Title V Operating Permit. The proposed modification is a Minor Modification to the Title V Permit.

In accordance with Rule 2520, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;

3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
   a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
   b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

As discussed above, the facility has applied for a Certificate of Conformity (COC). Therefore, the facility must apply to modify their Title V permit with an administrative amendment, prior to operating with the proposed modifications. Continued compliance with this rule is expected. The facility may construct/operate under the ATC permit upon submittal of the Title V administrative amendment application.

Rule 4101 Visible Emissions

Rule 4101 states that no air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity.

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

A permit condition will be listed on permit as follows:

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

Rule 4102 Nuisance

Section 4.0 prohibits discharge of air contaminants which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected as a result of these operations, provided the equipment is well maintained. Therefore, compliance with this rule is expected.

California Health & Safety Code 41700 (Health Risk Assessment)

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

An HRA is not required for a project with a total facility prioritization score of less than one. According to the Technical Services Memo for this project (Attachment D), the total facility prioritization score including this project was greater than one. Therefore, an HRA was required to determine the short-term acute and long-term chronic exposure from this project.

The cancer risk for this project is shown below:

HRA Summary		
Unit	Cancer Risk	T-BACT Required
C-801-43-5	0.005 per million	No

Discussion of T-BACT

BACT for toxic emission control (T-BACT) is required if the cancer risk exceeds one in one million. As demonstrated above, T-BACT is not required for this project because the HRA indicates that the risk is not above the District's thresholds for triggering T-BACT requirements; therefore, compliance with the District's Risk Management Policy is expected.

District policy APR 1905 also specifies that the increase in emissions associated with a proposed new source or modification not have acute or chronic indices, or a cancer risk greater than the District's significance levels (i.e. acute and/or chronic indices greater than 1 and a cancer risk greater than 10 in a million). As outlined by the HRA Summary in Attachment D of this report, the emissions increases for this project was determined to be less than significant.

Rule 4201 Particulate Matter Concentration

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

The manufacturer has guaranteed a PM_{10} emission rate of 0.001 gr/scf for each dust collector.

Since 0.001 grain/dscf is less than 0.1 grain/dscf, compliance with this rule is expected.

Rule 4202 Particulate Matter Emission Rate

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

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

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

The post-project process weight rate of the material handling operation is 49.88 tons per hour (equivalent to 1,197 tons/day).

Rule 4202 emission limit $= 17.31 * P^{0.16}$ (where P less than 30 tons/hr)
$= 17.31 * (49.88)^{0.16}$
$= 32.36$ lb/hr

The operation has a maximum Post Project Potential to Emit (PE2) of 0.004 lb/hr (0.1 lb/day ÷ 24 hr/day).

Therefore, the PM emissions are within allowable limits and compliance with the rule is expected.

California Health & Safety Code 42301.6 (School Notice)

The District has verified that this site is not located within 1,000 feet of a school. Therefore, pursuant to California Health and Safety Code 42301.6, a school notice is not required.

California Environmental Quality Act (CEQA)

The California Environmental Quality Act (CEQA) requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The San Joaquin Valley Unified Air Pollution Control District (District) adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities.
- Identify the ways that environmental damage can be avoided or significantly reduced.
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible.
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

The District performed an Engineering Evaluation (this document) for the proposed project and determined that all project specific emission units are exempt from Best Available Control Technology (BACT) requirements. Furthermore, the District has determined that potential emission increases would have a less than significant health impact on sensitive receptors.

Issuance of permits for emissions units not subject to BACT requirements and with health impact less than significant is a matter of ensuring conformity with applicable District rules and regulations and does not require discretionary judgment or deliberation. Thus, the District concludes that this permitting action constitutes a ministerial approval. Section 21080 of the Public Resources Code exempts from the application of CEQA those projects over which a public agency exercises only ministerial approval. Therefore, the District finds that this project is exempt from the provisions of CEQA.

IX. Recommendation

Compliance with all applicable rules and regulations is expected. Issue Authority to Construct permit C-801-43-5 subject to the permit conditions on the attached draft Authority to Construct permit in Attachment E.

X. Billing Information

Annual Permit Fees			
Permit Number	Fee Schedule	Fee Description	Annual Fee
C-801-43-5	3020-01-A	20 hp	$87.00

Attachments

A. Current Permit to Operate Permit
B. Quarterly Net Emissions Change (QNEC)
C. Certificate of Conformity
D. Health Risk Assessment Analysis
E. Draft Authority to Construct Permit

Attachment A

Current Permit to Operate Permit

San Joaquin Valley
Air Pollution Control District

PERMIT UNIT: C-801-43-3 **EXPIRATION DATE:** 01/31/2015

EQUIPMENT DESCRIPTION:
NORTH SIDE CONVEYOR ACCEPTING TRANSFER OF BATCH AND CULLET TO FURNACE #1 AND CULLET WEIGHING CONVEYOR SERVED BY DONALDSON MODULAR TORIT (54 MBT 8)

PERMIT UNIT REQUIREMENTS

1. Visible emissions from baghouse shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. Particulate matter emissions from each source operation shall not exceed the maximum allowable emission rate (lb/hr), as determined using the following formula: E = 3.59 x P^0.62, where E equals the maximum allowable emission rate (lb/hr) and P equals the process weight (tons/hr) and is less than or equal to 30 tons/hr. [District Rule 4202] Federally Enforceable Through Title V Permit
4. Controlled PM10 emissions from the dust collector shall not exceed 0.0001 gr/scf. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The baghouse shall operate at all times with a minimum differential pressure of 0.5 inches water column and a maximum differential pressure of 6 inches water column. [District Rule 2201] Federally Enforceable Through Title V Permit
7. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 4102]
8. The baghouse shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Replacement bags numbering at least 10% of the total number of bags in the baghouse shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rules 2201 and 4102]
12. Visible emissions from each baghouse shall be inspected monthly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted [District Rule 2520] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

13. Dust collector filters for each baghouse shall be inspected weekly while in operation for evidence of particulate matter breakthrough and replaced as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
14. Dust collector filters for each baghouse shall be inspected monthly while not in operation for tears, scuffs, abrasions or holes which might interfere with the PM collection efficiency and shall be replaced as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
15. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records of dust collector maintenance, inspections, and repair for each baghouse 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] Federally Enforceable Through Title V Permit
17. Records of all maintenance of the baghouse, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rules 4201 (as amended December 17, 1992) and 4202 (as amended December 17, 1992) and Madera County Rule 402. A permit shield is granted from these requirements [District Rule 2520] Federally Enforceable Through Title V Permit

Attachment B

Quarterly Net Emissions Change (QNEC)

The Quarterly Net Emissions Change is used to complete the emission profile screen for the District's PAS database. The QNEC shall be calculated as follows:

QNEC = PE2 - BE, where:

QNEC = Quarterly Net Emissions Change for each emissions unit, lb/qtr.
PE2 = Post Project Potential to Emit for each emissions unit, lb/qtr.
BE = Baseline Emissions (per Rule 2201) for each emissions unit, lb/qtr.

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

$PE2_{quarterly}$ = $PE2_{annual}$ ÷ 4 quarters/year
= 41 lb/year ÷ 4 qtr/year
= 10 lb PM_{10}/qtr

$BE_{quarterly}$ = BE_{annual} ÷ 4 quarters/year
= 23 lb/year ÷ 4 qtr/year
= 6 lb PM_{10}/qtr

C-801-43-5: Quarterly NEC [QNEC]			
	PE2 (lb/qtr)	BE (lb/qtr)	NEC (lb/qtr)
NO_X	0	0	0
SO_X	0	0	0
PM_{10}	10	6	4
CO	0	0	0
VOC	0	0	0

Attachment C

Certificate of Conformity

San Joaquin Valley
Unified Air Pollution Control District

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

[ ] SIGNIFICANT PERMIT MODIFICATION
[ ] MINOR PERMIT MODIFICATION
[x] ADMINISTRATIVE AMENDMENT

COMPANY NAME: Saint-Gobain Containers, Inc.	FACILITY ID: C- 801
1. Type of Organization: [x] Corporation [ ] Sole Ownership [ ] Government [ ] Partnership [ ] Utility	
2. Owner's Name: Saint-Gobain Containers, Inc.	
3. Agent to the Owner: n/a	

II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):

MJG Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).

MJG Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.

MJG Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.

MJG Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:

Michael J. Gibbons — 5/31/13

Signature of Responsible Official — Date

Michael. J. Gibbons

Name of Responsible Official (please print)

Plant Manager

Title of Responsible Official (please print)

Attachment D

Health Risk Assessment Analysis

San Joaquin Valley Air Pollution Control District
Risk Management Review

To:	Stanley Tom – Permit Services
From:	Leland Villalvazo – Technical Services
Date:	July 5, 2013
Facility Name:	Saint-Gobain Containers
Location:	24441 Avenue 12 & Road 24 1/2
Application #(s):	C-801-43-5
Project #:	C-1131833

A. RMR SUMMARY

RMR Summary				
Categories	**Dust Collector (43-5)**		**Project Totals**	**Facility Totals**
Prioritization Score	NA		NA	>1.0
Acute Hazard Index	4.66E-04		4.66E-04	4.76E-04
Chronic Hazard Index	2.80E-04		2.8E-04	2.80E-04
Maximum Individual Cancer Risk (10^{-6})	0.005		0.005	2.26
T-BACT Required?	**No**			
Special Permit Conditions?	**No**			

Proposed Permit Conditions

To ensure that human health risks will not exceed District allowable levels; the following permit conditions must be included for:

Unit # 43-5

No special conditions are required.

B. RMR REPORT

I. Project Description

Technical Services received a request on June 13, 2013 to perform a Risk Management Review for a proposed replacement of the current dust collector with a dust collector with a greater design flow rate.

II. Analysis

Technical Services performed a prioritization using the District's HEARTs database. Since the total facility prioritization score was greater than one, a refined health risk assessment was required. Emissions were calculated using District approved emission factors and inputted into the HEARTs database. The AERMOD model was used, with the parameters outlined below and meteorological data for 2005-2009 from Fresno to determine the dispersion factors (i.e., the predicted concentration or X divided by the normalized source strength or Q) for a receptor grid. These dispersion factors were input into the Hot Spots Analysis and Reporting Program (HARP) risk assessment module to calculate the chronic and acute hazard indices and the carcinogenic risk for the project.

The following parameters were used for the review:

Analysis Parameters Unit 43-5			
Source Type	Point	**Location Type**	Rural
Stack Height (m)	3.05	**Closest Receptor (m)**	609.6
Stack Diameter. (m)	0.61	**Type of Receptor**	Business
Stack Exit Velocity (m/s)	8.73	**Max Hours per Year**	8000
Stack Exit Temp. (°K)	298.15	**Fuel Type**	NA

III. Conclusion

The acute and chronic indices are below 1.0 and the cancer risk factor associated with the project is less than 1.0 in a million. **In accordance with the District's Risk Management Policy, the project is approved without Toxic Best Available Control Technology (T-BACT).**

To ensure that human health risks will not exceed District allowable levels; the permit conditions listed on page 1 of this report must be included for this proposed unit.

These conclusions are based on the data provided by the applicant and the project engineer. Therefore, this analysis is valid only as long as the proposed data and parameters do not change.

IV. Attachments

A. RMR request from the project engineer
B. Additional information from the applicant/project engineer
C. Toxic emissions summary
D. Prioritization score

Attachment E

Draft Authority to Construct (ATC) Permit

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT

PERMIT NO: C-801-43-5

ISSUANCE DATE: DRAFT

LEGAL OWNER OR OPERATOR: SAINT-GOBAIN CONTAINERS, INC
MAILING ADDRESS: ATTN: ENVIRONMENTAL MANAGER/V. KRULIC
PO BOX 4200
MUNCIE, IN 47307-4200

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

EQUIPMENT DESCRIPTION:
MODIFICATION OF NORTH SIDE CONVEYOR ACCEPTING TRANSFER OF BATCH AND CULLET TO FURNACE #1 AND CULLET WEIGHING CONVEYOR SERVED BY DONALDSON MODULAR TORIT (54 MBT 8): REPLACE EXISTING DONALDSON MODULAR TORIT (54 MBT 8) DUST COLLECTOR WITH MAC PROCESS MODEL 120LST81 DUST COLLECTOR

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Visible emissions from baghouse shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. Particulate matter emissions from each source operation shall not exceed the maximum allowable emission rate (lb/hr), as determined using the following formula: E = 3.59 x P^0.62, where E equals the maximum allowable emission rate (lb/hr) and P equals the process weight (tons/hr) and is less than or equal to 30 tons/hr. [District Rule 4202] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

DRAFT

DAVID WARNER, Director of Permit Services

C-801-43-5 : Jul 19 2013 12:26PM – TOMS : Joint Inspection NOT Required

6. Controlled PM10 emissions from the dust collector shall not exceed 0.0001 gr/scf. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The baghouse shall operate at all times with a minimum differential pressure of 5 inches water column and a maximum differential pressure of 17 inches water column. [District Rule 2201] Federally Enforceable Through Title V Permit
9. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 4102]
10. The baghouse shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Replacement bags numbering at least 10% of the total number of bags in the baghouse shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Material removed from the dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit
14. Visible emissions from each baghouse shall be inspected monthly during operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. If visible emissions cannot be corrected within 24 hours, a visible emissions test using EPA Method 9 shall be conducted [District Rule 2520] Federally Enforceable Through Title V Permit
15. Dust collector filters for each baghouse shall be inspected weekly while in operation for evidence of particulate matter breakthrough and replaced as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
16. Dust collector filters for each baghouse shall be inspected monthly while not in operation for tears, scuffs, abrasions or holes which might interfere with the PM collection efficiency and shall be replaced as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
17. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Records of dust collector maintenance, inspections, and repair for each baghouse 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] Federally Enforceable Through Title V Permit
19. Records of all maintenance of the baghouse, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Records shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
21. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rules 4201 (as amended December 17, 1992) and 4202 (as amended December 17, 1992) and Madera County Rule 402. A permit shield is granted from these requirements [District Rule 2520] Federally Enforceable Through Title V Permit

DRAFT