South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 · www.aqmd.gov

November 6, 2009

Mr. Gerardo C. Rios
Chief, Permits Office
U.S. EPA Region IX AIR 3
75 Hawthorne Street
San Francisco, CA 94105-3901

Dear Mr. Rios:

Subject: Bentley Prince Street, Inc. – I.D. No. 40034, Title V Permit Modification

Bentley has proposed to revise their Title V Permit as follows:

Additional material to be stored in the silo
Addition of a dust collector serving a new super sack unloading station
Addition of a pneumatic conveyor
Addition of a filter vent serving two mixers

The proposed permit revision is considered as a "deminimis significant permit revision" to their Title V Permit. Enclosed for your review are the permit evaluation and draft permit for the proposed permit revision. AQMD is proposing to issue the revised Title V permit after the completion of EPA's 45-day review period, but no earlier than January 1, 2010.

If you have any questions or need additional information regarding the proposed permit revision, please contact Ms. Dixie Richards at (909) 396-2395.

Sincerely,

Brian L. Yeh
Senior Manager
Chemical/Mechanical Operations

BLY:DR

Enclosure

//SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT	PAGES	PAGE
ENGINEERING DIVISION	APPL. NO. See below	DATE 9/9/09
APPLICATION PROCESSING AND CALCULATIONS	PROCESSED BY DR	CHECKED BY

EQUIPMENT DESCRIPTION

APPLICATION NO. 469025
STORAGE SILO (D2), ALUMINA TRIHYDRATE/ANHYDROUS ALUMINUM SILICATE, 24' H. X 12' D., WITH A FILTER VENT

APPLICATION NO. 469028
STORAGE SILO (D1), CALCIUM CARBONATE, 2800 CUBIC FEET

APPLICATION NO. 469027
AIR POLLUTION CONTROL SYSTEM CONSISTING OF:
1. DUST COLLECTOR (C52, NEW), CYCLONAIRE, REVERSE PULSE TYPE, WITH THREE CARTRIDGE FILTERS, 180 SQ.FT. TOTAL FILTER AREA,
2. EXHAUST SYSTEM WITH A 1.5 H.P. FAN, VENTING SUPER SACK UNLOADING STATION D53

APPLICATION NO. 469029
MIXING AND UNLOADING SYSTEM CONSISTING OF:
1. UNLOADING STATION (D53, NEW), CYCLONAIRE, SUPER SACK TYPE, ALUMINA TRIHYDRATE/ANHYDROUS ALUMINUM SILICATE
2. PNEUMATIC CONYEYOR (D54, NEW), CYCLONAIRE, MODEL HC-30
3. RECEIVER/FEEDER (D7), CYCLONE TYPE
4. MIXER NO.1 (D4), 2244 GAL.
5. MIXER NO.2 (D5), 5800 GAL
6. FILTER VENT (C56, NEW), CYCLONAIRE, MODEL 36-DC-9, PULSE JET TYPE, WITH NINE POLYESTER PLEATED FILTERS, 198 SQ.FT. TOTAL FILTER AREA, COMMON

APPLICATION NO. 469023
TITLE V/RECLAIM FACILITY MODIFICATION

BACKGROUND
The above equipment was installed or modified without permit to construct

A/N 469025
Existing equipment, previous A/N 111060, P/N M34984. Silo D2 previously stored alumina trihydrate only, and now stores either alumina trihydrate or Envirotex (anhydrous aluminum silicate)

A/N 469028
Existing equipment, previous A/N 406978, P/N F63813. This application was submitted to remove venting of the mixers through the silo. Company now states that the mixers are vented through the silo,

with alternative venting to the new filter vent instead. This application will be cancelled. No refund since processing for the requested modification had already been initiated.

A/N 469027
New equipment. Per discussion with supervisor Hubert Wilson, the super sack unloading system with pneumatic conveyor should be part of the mixer permit unit. Per discussion with the applicant, the super sack unloading station has an integral dust collector with blower. This application will be used to cover the dust collector, which requires a separate permit.

A/N 469029
Existing equipment, previous A/N 153070, P/N M55911. Per discussions and revised flow diagram, mixer #1 (D4) and mixer #2 (D5) are vented to silo #1 (D1), but can alternately be connected to the new filter vent (C56) instead. The filter vent will be used if there is a problem with cross contamination and they do not want that material vented into the silo. This might be the case with some recycled material.

The new super sack unloading station and pneumatic conveyor are also incorporated into this application.

PROCESS DESCRIPTION

The facility is in the business of manufacturing carpeting. The above equipment is used to make carpet backing. See attached flow diagram.

EMISSION ESTIMATES

A/N 469025 – Silo D2
No increase in PTE resulting from the change to include anhydrous aluminum silicate.

A/N 469028 – Silo D1
No change in silo PTE. Mixer emissions credited to the mixer application, not the silo.

A/N 469029
Mixers
Previous PTE - see previous A/N 153070:
Mixer 1 Mixer 2
(14503 #/batch)(2 batches/day) + (28144 #/batch)(1 batch/day) = 57150 #/day
2 #PM/T (standard District solids handling factor, as used in previous evaluation)
99% Control
All emissions after control assumed to be PM10, 50% PM10 assumed prior to control

(57150#/day)(T/2000 #)(2#PM/T) = 57.15 #PM/day, 28.6 #PM10/day, uncontrolled
(57.15 #PM/day)(1 – 0.99) = 0.57 #/day PM-PM10/day, controlled

No change in emissions resulting from the change to a new filter vent. Mixers can now be loaded with alumina trihydrate or anhydrous aluminum silicate from either silo D2 or the new super sack station. Higher emissions may occur when the mixers are loaded pneumatically via the new super sack unloading system vs. being loaded by gravity from silo D2. Since the mixers are controlled by a filter, any increase due to the pneumatic loading into the mixers is likely negligible. Previous mixer calculations assumed the generic District solids handling emissions factor, so no change in calculated PTE for the mixers if no increase in throughput. However, applicant has now requested a throughput limit of 9678#/hr, 24hr/day (232,272 #/day), 7 days/week, 31 days/mo (3600 T/mo). The mixers did not previously have throughput limits.

Increase in calculated PTE
(232,272 - 57150 #/day)(T/2000#)(2 #PM/T) = 175.122 #PM/day, 87.56 #PM10/day, uncontrolled
(175.122 #PM/day)(1 – 0.99) = 1.75 #PM/PM10/day, controlled

Total = (232,272 #/day)(T/2000#)(2 #PM/T) = 232 #PM/day, 116 #PM10/day, uncontrolled
(232 #PM/day)(1 – 0.99) = 2.32 #PM/PM10/day, controlled

(3600 T/mo)(2 #/T)(1 – 0.99)/ 30 = 2.4 #PM/PM10/day, 30 day average

Air to Cloth ratio

A/N 469027 – Dust collector on super sack unloading station
634/180 = 3.5 Acceptable

A/N 469029 – filter vent on mixers
Maximum air when loaded by the pneumatic conveyor
350/198 = 1.77 Acceptable

RULE COMPLIANCE

Rule 212 – Public Notification
(c)(1) Requires a public notice for all new or modified permit units that may emit air contaminants located within 1,000 feet from the outer boundary of a school. According to the website greatschools.com, the closest schools, Puente Hills HS, Nelson Elementary, Valley Day School, Valley Community Day School, and Valley Alternative High School are 0.8 miles (4224 ft) from Vista Metals. A 30-Day Public Notice is not required under this paragraph.
212(c)(2) The equipment will not result in on-site emission increase exceeding the daily maximums as specified in the table in Rule 212(g). Therefore, a 30-day public notice period will not be required under this paragraph.
(c)(3) Public notice will not be required under this paragraph. See Rule 1401 evaluation section.

Rule 401 – Visible Emissions
Compliance is expected

Rule 402- Nuisance
Compliance with this is rule is expected.

New Source Review
BACT
Emssion points are vented to baghouse or filter vent. Complies

Air Quality Modeling
Less than screening table. Complies

Emissions Offsets
Facility PM10 is less than 4 T/yr (4#/day in NSR, < .5 T/yr in AER)
Offsets not required, assuming the moratorium is lifted.

1401
No toxic compounds will be used in this equipment

Rule 3000 – Title V
This is a de minimus significant permit revision. EPA review is required.

RECOMMENDATION
A/N 469028 will be cancelled. Other applications will be placed on hold until the moratorium is lifted.

FACILITY PERMIT TO OPERATE
BENTLEY PRINCE STREET INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 1 : CARPET PRODUCTION LINE NO. 1, FINISHING LINE					
System 1 : RAW MATERIAL STORAGE AND MIXING					
STORAGE SILO, CALCIUM CARBONATE, 2,800 CUBIC FEET CAPACITY A/N: 406978	D1	D4 D5 D7 C51		**PM: (9) [RULE 405,2-7-1986]**	D323.1
STORAGE SILO, ALUMINA TRIHYDRATE OR ANHYDROUS ALUMINUM SILICATE, WITH FABRIC FILTER, HEIGHT: 24 FT; DIAMETER: 12 FT A/N:	D2			**PM: (9) [RULE 404,2-7-1986;RULE 405,2-7-1986]**	D322.1, D381.1, K67.1
CYCLONE, RECEIVER/FEEDER, DIAMETER: 1 FT 4 IN A/N: 153070	D7	D1 D4 D5			
MIXER, NO. 1, 2244 GALS; DIAMETER: 7 FT; HEIGHT: 10 FT 6 IN A/N:	D4	D1 D7 C56		**PM: (9) [RULE 405,2-7-1986]**	D323.1, E54.1, E54.2
MIXER, NO. 2, 5800 GALS; DIAMETER: 9 FT; HEIGHT: 12 FT A/N:	D5	D1 D7 C56		**PM: (9) [RULE 405,2-7-1986]**	D323.1, E54.1, E54.2
BAGHOUSE, DONALDSON, MODEL 16PJD, WITH PULSE JET CLEANING, 159 SQ.FT. A/N: 406975	C51	D1		**PM: (9) [RULE 404,2-7-1986]**	D322.1, D381.1, E102.1, K67.1
DUST COLLECTOR, CARTRIDGE FILTER, CYCLONAIRE, REVERSE PULSE CLEANING, 180 SQ. FT. TOTAL, 60 SQ.FT.; 3 CARTRIDGE A/N:	C52	D53		**PM: (9) [RULE 404,2-7-1986]**	D322.1, D381.1, E102.1, K67.1

* (1)(1A)(1B) Denotes RECLAIM emission factor
(2)(2A)(2B) Denotes RECLAIM emission rate
(3) Denotes RECLAIM concentration limit
(4) Denotes BACT emission limit
(5)(5A)(5B) Denotes command and control emission limit
(6) Denotes air toxic control rule limit
(7) Denotes NSR applicability limit
(8)(8A)(8B) Denotes 40 CFR limit(e.g. NSPS, NESHAPS,etc.)
(9) See App B for Emission Limits
(10) See Section J for NESHAP/MACT requirements

** Refer to Section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE
BENTLEY PRINCE STREET INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 1 : CARPET PRODUCTION LINE NO. 1, FINISHING LINE					
UNLOADING STATION, CYCLONAIRE, SUPER SACK A/N:	D53	C52		**PM:** (9) **[RULE 405,2-7-1986]**	D323.1, E440.1
CONVEYOR, PNEUMATIC, ALUMINA TRIHYDRATE OR ANHYDROUS ALUMINUM SILICATE, CYCLONAIRE, MODEL HC-30 WITH A/N: KNOCKOUT BOX	D54				
DUST COLLECTOR, CYCLONAIRE, MODEL 36-DC-9, PULSE JET CLEANING, 198 SQ. FT. TOTAL, 22 SQ.FT.; 9 CARTRIDGE A/N:	C56	D4 D5		**PM:** (9) **[RULE 404,2-7-1986]**	D322.1, D381.1, E102.1, K67.1
System 2 : COATING, CURING AND PROCESSING					
TANK, SURGE, NO. 1, ADHESIVE, 1125 GALS A/N: 424208	D8				
TANK, SURGE, NO. 2, ADHESIVE, 1125 GALS A/N: 424208	D9				
COATER, SYSTEM NO. 1 A/N: 424208	D10			**ROG:** (9) **[RULE 1128,3-8-1996;RULE 1171,11-7-2003;*RULE 1171, 7-14-2006*]**	C1.1, H23.3

* (1)(1A)(1B) Denotes RECLAIM emission factor
(2)(2A)(2B) Denotes RECLAIM emission rate
(3) Denotes RECLAIM concentration limit
(4) Denotes BACT emission limit
(5)(5A)(5B) Denotes command and control emission limit
(6) Denotes air toxic control rule limit
(7) Denotes NSR applicability limit
(8)(8A)(8B) Denotes 40 CFR limit(e.g. NSPS, NESHAPS,etc.)
(9) See App B for Emission Limits
(10) See Section J for NESHAP/MACT requirements

** Refer to Section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE
BENTLEY PRINCE STREET INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

Equipment	ID No.	Connected To	RECLAIM Source Type/ Monitoring Unit	Emissions * And Requirements	Conditions
Process 1 : CARPET PRODUCTION LINE NO. 1, FINISHING LINE					
OVEN, DRYING, SYSTEM NO. 1, NATURAL GAS, WITH LOW NOX BURNER, 21.6 MMBTU/HR WITH A/N: 424208 BURNER, NATURAL GAS, MAXON, MODEL CYCLOMAX, WITH LOW NOX BURNER, 8 TOTAL; 2.7 MMBTU/HR	D11		NOX: LARGE SOURCE**	**CO:** 2000 PPMV (5) **[RULE 407,4-2-1982]** ; **NOX:** 80 PPMV NATURAL GAS (3) **[RULE 2012,5-6-2005]** ; **PM:** (9) **[RULE 404,2-7-1986]** **PM:** 0.1 GRAINS/SCF (5) **[RULE 409,8-7-1981]**	C1.4, C6.2, D323.1
CARPET SHEARER, SYSTEM NO. 1 A/N: 424208	D12	C13		**PM:** (9) **[RULE 405,2-7-1986]**	D323.1
BAGHOUSE, SELLERS, 2067 SQ.FT.; 56 BAGS A/N: 111054	C13	D12		**PM:** (9) **[RULE 404,2-7-1986]**	D322.1, D381.2, E102.1, K67.1

* (1)(1A)(1B) Denotes RECLAIM emission factor
(2)(2A)(2B) Denotes RECLAIM emission rate
(3) Denotes RECLAIM concentration limit
(4) Denotes BACT emission limit
(5)(5A)(5B) Denotes command and control emission limit
(6) Denotes air toxic control rule limit
(7) Denotes NSR applicability limit
(8)(8A)(8B) Denotes 40 CFR limit(e.g. NSPS, NESHAPS,etc.)
(9) See App B for Emission Limits
(10) See Section J for NESHAP/MACT requirements

** Refer to Section F and G of this permit to determine the monitoring, recordkeeping and reporting requirements for this device.

FACILITY PERMIT TO OPERATE
BENTLEY PRINCE STREET INC

SECTION D: DEVICE ID INDEX

The following sub-section provides an index to the devices that make up the facility description sorted by device ID.

FACILITY PERMIT TO OPERATE
BENTLEY PRINCE STREET INC

SECTION D: DEVICE ID INDEX

Device Index For Section D			
Device ID	**Section D Page No.**	**Process**	**System**
D1	1	1	1
D2	1	1	1
D4	1	1	1
D5	1	1	1
D7	1	1	1
D8	2	1	2
D9	2	1	2
D10	2	1	2
D11	3	1	2
D12	3	1	2
C13	3	1	2
C51	1	1	1
C52	1	1	1
D53	2	1	1
D54	2	1	1
C56	2	1	1

FACILITY PERMIT TO OPERATE
BENTLEY PRINCE STREET INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

FACILITY CONDITIONS

F9.1 Except for open abrasive blasting operations, the operator shall not discharge into the atmosphere from any single source of emissions whatsoever any air contaminant for a period or periods aggregating more than three minutes in any one hour which is:

(a) As dark or darker in shade as that designated No.1 on the Ringelmann Chart, as published by the United States Bureau of Mines; or

(b) Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subparagraph (a) of this condition.

[**RULE 401, 3-2-1984**; RULE 401, 11-9-2001]

F14.1 The operator shall not use diesel fuel containing sulfur compounds in excess of 0.05 percent by weight.

[**RULE 431.2, 5-4-1990**; RULE 431.2, 9-15-2000]

F14.2 The operator shall not use diesel fuel containing sulfur compounds in excess of 15 ppm by weight as supplied by the supplier.

[RULE 431.2, 9-15-2000]

F24.1 Accidental release prevention requirements of Section 112(r)(7):

a). The operator shall comply with the accidental release prevention requirements pursuant to 40 CFR Part 68 and shall submit to the Executive Officer, as a part of an annual compliance certification, a statement that certifies compliance with all of the requirements of 40 CFR Part 68, including the registration and submission of a risk management plan (RMP).

b). The operator shall submit any additional relevant information requested by the Executive Officer or designated agency.

[40CFR 68 - Accidental Release Prevention, 5-24-1996]

DEVICE CONDITIONS

B. Material/Fuel Type Limits

FACILITY PERMIT TO OPERATE
BENTLEY PRINCE STREET INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

B75.1 The operator shall not use LPG in this equipment except under the following circumstance(s):

Natural gas curtailment

Maintenance testing

Compliance testing

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002]

[Devices subject to this condition : D25, D26, D27]

C. Throughput or Operating Parameter Limits

C1.1 The operator shall limit the material processed to no more than 70 feet per minute.

For the purpose of this condition, material processed shall be defined as carpet in this system.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D10, D40]

C1.2 The operator shall limit the material processed to no more than 280000 lbs in any one day.

For the purpose of this condition, material processed shall be defined as carpet in this system.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D15, D16, D18, D19]

C1.4 The operator shall limit the natural gas fuel usage to no more than 1.17669e+07 cubic feet per month.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002]

[Devices subject to this condition : D11]

FACILITY PERMIT TO OPERATE
BENTLEY PRINCE STREET INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

C1.5 The operator shall limit the operating time to no more than 199 hour(s) in any one year.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; **RULE 1304(a)-Modeling and Offset Exemption, 6-14-1996**; **RULE 2012, 5-6-2005]**

[Devices subject to this condition : D28]

C6.1 The operator shall use this equipment in such a manner that the temperature being monitored, as indicated below, does not exceed 375 Deg F.

To comply with this condition, the operator shall install and maintain a(n) temperature gauge to accurately indicate the temperature in the oven.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002; **RULE 401, 3-2-1984**; RULE 401, 11-9-2001]

[Devices subject to this condition : D40]

C6.2 The operator shall use this equipment in such a manner that the temperature being monitored, as indicated below, does not exceed 450 Deg F.

To comply with this condition, the operator shall install and maintain a(n) temperature gauge to accurately indicate the temperature in the oven.

[RULE 1303(b)(2)-Offset, 5-10-1996; RULE 1303(b)(2)-Offset, 12-6-2002; **RULE 401, 3-2-1984**; RULE 401, 11-9-2001]

[Devices subject to this condition : D11]

D. Monitoring/Testing Requirements

D12.1 The operator shall install and maintain a(n) non-resettable elapsed time meter to accurately indicate the elapsed operating time of the engine.

[RULE 2012, 5-6-2005]

[Devices subject to this condition : D28]

FACILITY PERMIT TO OPERATE
BENTLEY PRINCE STREET INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

D182.1 The operator shall test this equipment in accordance with the following specifications:

During the adjustments and tune-up of the control system, NOx and CO emissions data shall be determined and measured by a portable analyzer.

[RULE 1146, 11-17-2000; RULE 2012, 5-6-2005]

[Devices subject to this condition : D25, D26, D27]

D322.1 The operator shall perform annual inspection of the equipment and filter media for leaks, broken or torn filter media, and improperly installed filter media.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : D2, C13, C17, C20, C51, C52, C56]

FACILITY PERMIT TO OPERATE
BENTLEY PRINCE STREET INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

D323.1 The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on an annual basis, at least, unless the equipment did not operate during the entire annual period. The routine annual inspection shall be conducted while the equipment is in operation and during daylight hours.

If any visible emissions (not including condensed water vapor) are detected that last more than three minutes in any one hour, the operator shall verify and certify within 24 hours that the equipment causing the emission and any associated air pollution control equipment are operating normally according to their design and standard procedures and under the same conditions under which compliance was achieved in the past, and either:

1). Take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit; or

2). Have a CARB-certified smoke reader determine compliance with the opacity standard, using EPA Method 9 or the procedures in the CARB manual "Visible Emission Evaluation", within three business days and report any deviations to AQMD.

The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

1). Stack or emission point identification;

2). Description of any corrective actions taken to abate visible emissions;

3). Date and time visible emission was abated; and

4). All visible emission observation records by operator or a certified smoke reader.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : D1, D4, D5, D11, D12, D15, D16, D18, D19, D40, D53]

D328.1 The operator shall determine compliance with the CO emission limit(s) either: (a) conducting a source test at least once every five years using AQMD Method 100.1 or 10.1; or (b) conducting a test at least annually using a portable analyzer and AQMD-approved test method. The test shall be conducted when the equipment is operating under normal conditions to demonstrate compliance with Rule 1146 concentration limit. The operator shall comply with all general testing, reporting, and recordkeeping requirements in Sections E and K of this permit.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : D25, D26, D27]

FACILITY PERMIT TO OPERATE
BENTLEY PRINCE STREET INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

D381.1 The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on an annual basis, at least, unless the equipment did not operate during the entire annual period. The routine annual inspection shall be conducted while the equipment is in operation and during daylight hours. If any visible emissions (not including condensed water vapor) are detected, the operator shall take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit.

The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

1). Stack or emission point identification;

2). Description of any corrective actions taken to abate visible emissions; and

3). Date and time visible emission was abated.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : D2, C51, C52, C56]

D381.2 The operator shall conduct an inspection for visible emissions from all stacks and other emission points of this equipment whenever there is a public complaint of visible emissions, whenever visible emissions are observed, and on a quarterly basis, at least, unless the equipment did not operate during the entire quarterly period. The routine quarterly inspection shall be conducted while the equipment is in operation and during daylight hours. If any visible emissions (not including condensed water vapor) are detected, the operator shall take corrective action(s) that eliminates the visible emissions within 24 hours and report the visible emissions as a potential deviation in accordance with the reporting requirements in Section K of this permit.

The operator shall keep the records in accordance with the recordkeeping requirements in Section K of this permit and the following records:

1). Stack or emission point identification;

2). Description of any corrective actions taken to abate visible emissions; and

3). Date and time visible emission was abated.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : C13, C17, C20]

E. Equipment Operation/Construction Requirements

FACILITY PERMIT TO OPERATE
BENTLEY PRINCE STREET INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

E54.1 The operator is not required to vent this equipment to the following equipment if all of the requirements listed below are met:

Device ID: D1 [Silo]

Requirement number 1: mixer is vented to dust collector C56

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; **RULE 401, 3-2-1984**; RULE 401, 11-9-2001]

[Devices subject to this condition : D4, D5]

E54.2 The operator is not required to vent this equipment to the following equipment if all of the requirements listed below are met:

Device ID: C56 [Dust Collector]

Requirement number 1: mixer is vented to silo D1

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; **RULE 401, 3-2-1984**; RULE 401, 11-9-2001]

[Devices subject to this condition : D4, D5]

E102.1 The operator shall discharge dust collected in this equipment only into closed containers.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; **RULE 401, 3-2-1984**; RULE 401, 11-9-2001]

[Devices subject to this condition : C13, C17, C20, C51, C52, C56]

E113.1 The operator shall have the burner equipped with a control system to automatically regulate the combustion air, fuel and, if applicable, recirculated flue gas as the boiler load varies. This control system shall be adjusted and tuned at least twice a year according to the manufacturer's specifications to maintain its ability to repeat the same performance at the same firing rate.

[RULE 1146, 11-17-2000; RULE 2012, 5-6-2005]

[Devices subject to this condition : D25, D26, D27]

FACILITY PERMIT TO OPERATE
BENTLEY PRINCE STREET INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

E440.1 The operator shall operate and maintain this equipment according to the following specifications:

The dust collector fan shall be turned on whenever the doors are open

The doors shall be kept closed except when changing bags

[RULE 1303(a)-BACT, 5-10-1996; RULE 401, 3-2-1984; RULE 401, 11-9-2001]

[Devices subject to this condition : D53]

H. Applicable Rules

H23.1 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
ROG	District Rule	1122

[RULE 1122, 10-1-2004]

[Devices subject to this condition : E43]

H23.2 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
Refrigerants	District Rule	1415

[RULE 1415, 10-14-1994]

[Devices subject to this condition : E44]

FACILITY PERMIT TO OPERATE
BENTLEY PRINCE STREET INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

H23.3 This equipment is subject to the applicable requirements of the following rules or regulations:

Contaminant	Rule	Rule/Subpart
VOC	District Rule	109

[RULE 109, 5-2-2003]

[Devices subject to this condition : D10]

K. Record Keeping/Reporting

K48.1 The operator shall maintain records in a manner approved by the District, to demonstrate compliance with the following condition number(s):

Condition Number E 113- 1

Condition Number D 182- 1

[RULE 1146, 11-17-2000; RULE 2012, 5-6-2005]

[Devices subject to this condition : D25, D26, D27]

K67.1 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

The name of the person performing the inspection and/or maintenance of the filter.

The date , time and results of the inspection.

The date, time and description of any maintenance or repairs resulting from the inspection.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : D2, C13, C17, C20, C51, C52, C56]

FACILITY PERMIT TO OPERATE
BENTLEY PRINCE STREET INC

SECTION D: FACILITY DESCRIPTION AND EQUIPMENT SPECIFIC CONDITIONS

The operator shall comply with the terms and conditions set forth below:

K67.2 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

For architectural applications where no thinners, reducers, or other VOC containing materials are added, maintain semi-annual records for all coating consisting of (a) coating type, (b) VOC content as supplied in grams per liter (g/l) of materials for low-solids coatings, (c) VOC content as supplied in g/l of coating, less water and exempt solvent, for other coatings.

For architectural applications where thinners, reducers, or other VOC containing materials are added, maintain daily records for each coating consisting of (a) coating type, (b) VOC content as applied in grams per liter (g/l) of materials used for low-solids coatings, (c) VOC content as applied in g/l of coating, less water and exempt solvent, for other coatings.

[RULE 3004(a)(4)-Periodic Monitoring, 12-12-1997]

[Devices subject to this condition : E45]

K67.3 The operator shall keep records, in a manner approved by the District, for the following parameter(s) or item(s):

The engine operating log listing the date of operation, the elapsed time in hours and the reason for operation.

[RULE 1303(a)(1)-BACT, 5-10-1996; RULE 1303(a)(1)-BACT, 12-6-2002; **RULE 1304(a)-Modeling and Offset Exemption, 6-14-1996**; **RULE 2012, 5-6-2005]**

[Devices subject to this condition : D28]