



**DEC 26 2013**

Mr. Mirko Muller  
Saint-Gobain Containers, Inc.  
P.O. Box 4200  
Muncie, IN 47307

**Re: Proposed Authority to Construct/Certificate of Conformity (Minor Mod)  
District Facility # C-801  
Project # C-1133217**

Dear Mr. Muller:

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 applicant proposes to correct the dust collector model numbers on current PTO C-801-3-7. The two Flex Kleen dust collectors should be listed as two DCE Dalamatic DU-10H-FS dust collectors.

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.

Seyed Sadredin  
Executive Director/Air Pollution Control Officer

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**Northern Region**  
4800 Enterprise Way  
Modesto, CA 95358-8718  
Tel: (209) 557-6400 FAX: (209) 557-6475

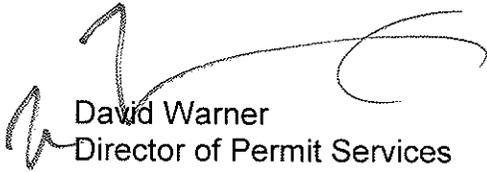
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Mr. Mirko Muller  
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Thank you for your cooperation in this matter.

Sincerely,



David Warner  
Director of Permit Services

Enclosures

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

**San Joaquin Valley Air Pollution Control District**  
**Authority to Construct Application Review**  
Container Glass Production Facility

Facility Name: Saint-Gobain Containers, Inc. Date: December 5, 2013  
Mailing Address: P.O. Box 4200 Engineer: Stanley Tom  
Muncie, IN 47307-4200 Lead Engineer: Joven Refuerzo  
Contact Person: Mirko Muller  
Telephone: (559) 675-4726  
Application #: C-801-3-11  
Project #: C-1133217  
Complete: November 22, 2013

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**I. Proposal**

Saint-Gobain Containers, Inc. (Saint-Gobain) operates a container glass manufacturing facility in Madera, CA. The applicant proposes to correct the dust collector model numbers on current PTO C-801-3-7 (see Attachment A). The two Flex Kleen dust collectors should be listed as two DCE Dalamatic DU-10H-FS dust collectors. To be conservative, this revision will be evaluated as a change in dust collectors.

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 (4/21/11)  
**Rule 2520** Federally Mandated Operating Permits (6/21/01)  
**Rule 4101** Visible Emissions (2/17/05)  
**Rule 4102** Nuisance (12/17/92)  
**Rule 4201** Particulate Matter – Concentration (12/17/92)  
**Rule 4202** Particulate Matter – Emission Rate (12/17/92)  
**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. 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

**C-801-3-7** RAW MATERIAL HANDLING INCLUDING UNLOADING, BATCH WEIGHING AND MIXING, AND MIXED BATCH STORAGE SERVED BY DONALDSON MBT 81-10, DONALDSON TORIT DOWNFLO MODEL #DFO 2-16, DONALDSON TORIT MODEL #100 PJD-8, AND TWO FLEX KLEEN DUST COLLECTORS

#### Proposed Modification

**C-801-3-11** MODIFICATION OF RAW MATERIAL HANDLING INCLUDING UNLOADING, BATCH WEIGHING AND MIXING, AND MIXED BATCH STORAGE SERVED BY DONALDSON MBT 81-10, DONALDSON TORIT DOWNFLO MODEL #DFO 2-16, DONALDSON TORIT MODEL #100 PJD-8, AND TWO FLEX KLEEN DUST COLLECTORS: CORRECT DUST COLLECTOR MODEL NUMBERS FROM TWO FLEX KLEEN DUST COLLECTORS TO TWO DCE DALAMATIC DU-10H-FS DUST COLLECTORS

#### Post Project Equipment Description

**C-801-3-11** RAW MATERIAL HANDLING INCLUDING UNLOADING, BATCH WEIGHING AND MIXING, AND MIXED BATCH STORAGE SERVED BY DONALDSON MBT 81-10, DONALDSON TORIT DOWNFLO MODEL #DFO 2-16, DONALDSON TORIT MODEL #100 PJD-8, AND TWO DCE DALAMATIC DU-10H-FS DUST COLLECTORS

**VI. Emission Control Technology Evaluation**

PM<sub>10</sub> is the pollutant of concern emitted from the material handling operations. The PM<sub>10</sub> emissions are controlled with baghouse dust collectors and cartridge filters.

**VII. General Calculations**

**A. Assumptions**

- Facility operates 24 hours per day, 365 days per year (per Applicant)
- PM<sub>10</sub> is the only pollutant of concern in this project
- All baghouse dust collectors have a PM<sub>10</sub> control efficiency of 99.9% (per manufacturer)
- 50% of PM is PM<sub>10</sub> (Rule 2201 Section 4.11.2)

**B. Emission Factors**

Emission Factor		
Permit Unit	gr-PM/dscf	Source
Truck and Train Unloading Conveyor and Bucket Elevator	0.0001	Manufacturer guarantee
Flex Kleen or DCE Dalamatic DU-10H-FS	0.0001	Manufacturer guarantee
Donaldson Torit Downflo (DFO 2-16)	0.001	Manufacturer guarantee
Donaldson Torit (100 PJD-8)	0.001	Manufacturer guarantee

**C. Calculations**

**1. Pre-Project Potential to Emit (PE1)**

Truck and Train Unloading Conveyor and Bucket Elevator

$$\begin{aligned} \text{Daily PE1} &= 0.0001 \text{ gr/dscf} \div 7,000 \text{ gr/lb} \times 6,500 \text{ (ft}^3\text{/min)} \times 1,440 \text{ min/day} \\ &= 0.1 \text{ lb-PM}_{10}\text{/day} \end{aligned}$$

$$\begin{aligned} \text{Annual PE1} &= 0.0001 \text{ gr/dscf} \div 7,000 \text{ gr/lb} \times 6,500 \text{ (ft}^3\text{/min)} \times 1,440 \text{ min/day} \times 365 \text{ days/year} \\ &= 49 \text{ lb-PM}_{10}\text{/year} \end{aligned}$$

Two dust collectors (Flex Kleen) to service Level Seven

$$\begin{aligned} \text{Daily PE1} &= 0.0001 \text{ gr/dscf} \div 7,000 \text{ gr/lb} \times 400 \text{ (ft}^3\text{/min)} \times 1,440 \text{ min/day} \times 2 \text{ dust collectors} \\ &= 0.0 \text{ lb-PM}_{10}\text{/day} \end{aligned}$$

$$\begin{aligned} \text{Annual PE1} &= 0.0001 \text{ gr/dscf} \div 7,000 \text{ gr/lb} \times 400 \text{ (ft}^3\text{/min)} \times 1,440 \text{ min/day} \times 365 \text{ days/year} \\ &\quad \times 2 \text{ dust collectors} \\ &= 6 \text{ lb-PM}_{10}\text{/year} \end{aligned}$$

Donaldson Torit Downflo (DFO 2-16)

$$\begin{aligned} \text{Daily PE1} &= 0.001 \text{ gr/dscf} \div 7,000 \text{ gr/lb} \times 7,100 \text{ (ft}^3\text{/min)} \times 1,440 \text{ min/day} \\ &= 1.5 \text{ lb-PM}_{10}\text{/day} \end{aligned}$$

$$\begin{aligned} \text{Annual PE1} &= 0.001 \text{ gr/dscf} \div 7,000 \text{ gr/lb} \times 7,100 \text{ (ft}^3\text{/min)} \times 1,440 \text{ min/day} \times 365 \text{ days/year} \\ &= 533 \text{ lb-PM}_{10}\text{/year} \end{aligned}$$

Donaldson Torit (100 PJD-8)

$$\begin{aligned} \text{Daily PE1} &= 0.001 \text{ gr/dscf} \div 7,000 \text{ gr/lb} \times 3,400 \text{ (ft}^3\text{/min)} \times 1,440 \text{ min/day} \\ &= 0.7 \text{ lb-PM}_{10}\text{/day} \end{aligned}$$

$$\begin{aligned} \text{Annual PE1} &= 0.001 \text{ gr/dscf} \div 7,000 \text{ gr/lb} \times 3,400 \text{ (ft}^3\text{/min)} \times 1,440 \text{ min/day} \times 365 \text{ days/year} \\ &= 255 \text{ lb-PM}_{10}\text{/year} \end{aligned}$$

<b>Pre-Project Potential to Emit Summary</b>		
Process	Daily PE (lb-PM <sub>10</sub> /day)	Annual PE (lb-PM <sub>10</sub> /year)
Truck and Train Unloading Conveyor and Bucket Elevator	0.1	49
Two dust collectors (Flex Kleen) to service Level Seven	0.0	6
Donaldson Torit Downflo (DFO 2-16)	1.5	533
Donaldson Torit (100 PJD-8)	0.7	255
<b>Total</b>	<b>2.3</b>	<b>843</b>

**2. Post Project Potential to Emit (PE2)**

Truck and Train Unloading Conveyor and Bucket Elevator

$$\begin{aligned} \text{Daily PE2} &= 0.0001 \text{ gr/dscf} \div 7,000 \text{ gr/lb} \times 6,500 \text{ (ft}^3\text{/min)} \times 1,440 \text{ min/day} \\ &= 0.1 \text{ lb-PM}_{10}\text{/day} \end{aligned}$$

$$\begin{aligned} \text{Annual PE2} &= 0.0001 \text{ gr/dscf} \div 7,000 \text{ gr/lb} \times 6,500 \text{ (ft}^3\text{/min)} \times 1,440 \text{ min/day} \times 365 \text{ days/year} \\ &= 49 \text{ lb-PM}_{10}\text{/year} \end{aligned}$$

Two dust collectors (DCE Dalamatic DU-10H-FS) to service Level Seven

$$\begin{aligned} \text{Daily PE2} &= 0.0001 \text{ gr/dscf} \div 7,000 \text{ gr/lb} \times 400 \text{ (ft}^3\text{/min)} \times 1,440 \text{ min/day} \times 2 \text{ dust collectors} \\ &= 0.0 \text{ lb-PM}_{10}\text{/day} \end{aligned}$$

$$\begin{aligned} \text{Annual PE2} &= 0.0001 \text{ gr/dscf} \div 7,000 \text{ gr/lb} \times 400 \text{ (ft}^3\text{/min)} \times 1,440 \text{ min/day} \times 365 \text{ days/year} \\ &\quad \times 2 \text{ dust collectors} \\ &= 6 \text{ lb-PM}_{10}\text{/year} \end{aligned}$$

Donaldson Torit Downflo (DFO 2-16)

$$\begin{aligned} \text{Daily PE2} &= 0.001 \text{ gr/dscf} \div 7,000 \text{ gr/lb} \times 7,100 \text{ (ft}^3\text{/min)} \times 1,440 \text{ min/day} \\ &= 1.5 \text{ lb-PM}_{10}\text{/day} \end{aligned}$$

$$\begin{aligned} \text{Annual PE2} &= 0.001 \text{ gr/dscf} \div 7,000 \text{ gr/lb} \times 7,100 \text{ (ft}^3\text{/min)} \times 1,440 \text{ min/day} \times 365 \text{ days/year} \\ &= 533 \text{ lb-PM}_{10}\text{/year} \end{aligned}$$

Donaldson Torit (100 PJD-8)

$$\begin{aligned} \text{Daily PE2} &= 0.001 \text{ gr/dscf} \div 7,000 \text{ gr/lb} \times 3,400 \text{ (ft}^3\text{/min)} \times 1,440 \text{ min/day} \\ &= 0.7 \text{ lb-PM}_{10}\text{/day} \end{aligned}$$

$$\begin{aligned} \text{Annual PE2} &= 0.001 \text{ gr/dscf} \div 7,000 \text{ gr/lb} \times 3,400 \text{ (ft}^3\text{/min)} \times 1,440 \text{ min/day} \times 365 \text{ days/year} \\ &= 255 \text{ lb-PM}_{10}\text{/year} \end{aligned}$$

<b>Post-Project Potential to Emit Summary</b>		
Process	Daily PE (lb-PM <sub>10</sub> /day)	Annual PE (lb-PM <sub>10</sub> /year)
Truck and Train Unloading Conveyor and Bucket Elevator	0.1	49
Two dust collectors (DCE Dalamatic DU-10H-FS) to service Level Seven	0.0	6
Donaldson Torit Downflo (DFO 2-16)	1.5	533
Donaldson Torit (100 PJD-8)	0.7	255
<b>Total</b>	<b>2.3</b>	<b>843</b>

**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.

<b>Pre-Project Stationary Source Potential to Emit [SSPE1] (lb/year)</b>					
	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	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 Section 4.10 of 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:

<b>Post-Project Stationary Source Potential to Emit [SSPE2] (lb/year)</b>					
	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	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

<b>Rule 2201 Major Source Determination (lb/year)</b>					
	NO <sub>x</sub>	SO <sub>x</sub>	PM <sub>10</sub>	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<sub>x</sub>, SO<sub>x</sub>, 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.

<b>PSD Major Source Determination (tons/year)</b>		
	NO <sub>2</sub>	CO <sub>2</sub> e
Estimated Facility PE before Project Increase	473.3*	> 100,000*
PSD Major Source Thresholds	250	100,000
PSD Major Source ? (Y/N)	Y	Y

\* Per project C-1132566

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, Section 3.22.

### 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.

All emission units in this project are served by dust collectors, which have PM<sub>10</sub> control efficiencies 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.*"

Calculated emission increases from new or modified emission units that are less than or equal to 0.5 lb/day are rounded to 0 (consistent with District Policy APR-1130 Increases Maximum Daily Permitted Emissions Less Than or Equal to 0.5 lb/day). This calculation is performed on an emission unit by emission unit basis. New or modified emission units with emission increases that round to 0 shall not constitute an SB 288 Major Modification.

This project results in an emission increase less than 0.5 lb/day for each emissions unit. Therefore, this project shall not constitute an SB 288 Major Modification.

## 8. Federal Major Modification

District Rule 2201, Section 3.17 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 <sub>x</sub>	0
PM <sub>10</sub>	30,000
SO <sub>x</sub>	80,000

Calculated emission increases from new or modified emission units that are less than or equal to 0.5 lb/day are rounded to 0 (consistent with District Policy APR-1130 Increases Maximum Daily Permitted Emissions Less Than or Equal to 0.5 lb/day). This calculation is performed on an emission unit by emission unit basis. New or modified emission units with emission increases that round to 0 shall not constitute a Federal Major Modification.

This project results in an emission increase less than 0.5 lb/day for each emissions unit. Therefore, this project shall not constitute 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 unclassified, pollutants. The pollutants addressed in the PSD applicability determination are listed as follows:

- NO<sub>2</sub> (as a primary pollutant)
- SO<sub>2</sub> (as a primary pollutant)
- CO
- PM
- PM<sub>10</sub>
- Greenhouse gases (GHG): CO<sub>2</sub>, N<sub>2</sub>O, CH<sub>4</sub>, HFCs, PFCs, and SF<sub>6</sub>

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.

<b>PSD Significant Emission Increase Determination: Potential to Emit (tons/year)</b>						
	NO <sub>2</sub>	SO <sub>2</sub>	CO	PM	PM <sub>10</sub>	CO <sub>2</sub> e
Total PE from New and Modified Units	0	0	0	0.003	0.003	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 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 - PE1, where:

- QNEC = Quarterly Net Emissions Change for each emissions unit, lb/qtr.
- PE2 = Post Project Potential to Emit for each emissions unit, lb/qtr.
- PE1 = Pre-Project Potential to Emit 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 PE1 can be calculated as follows:

Quarterly NEC [QNEC]			
	PE2 (lb/qtr)	PE1 (lb/qtr)	QNEC (lb/qtr)
NO <sub>x</sub>	0	0	0
SO <sub>x</sub>	0	0	0
PM <sub>10</sub>	211	211	0
CO	0	0	0
VOC	0	0	0

## 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:

$$\text{AIPE} = \text{PE2} - \text{HAPE}$$

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)

$$\text{HAPE} = \text{PE1} \times (\text{EF2}/\text{EF1})$$

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

$$\text{AIPE} = \text{PE2} - (\text{PE1} \times (\text{EF2} / \text{EF1}))$$

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

Two dust collectors to service Level Seven

$$\begin{aligned} \text{AIPE} &= 0.0 - (0.0 * (1)) \\ &= 0.0 - 0.0 * 1 \\ &= 0.0 \text{ lb-PM}_{10}\text{/day} \end{aligned}$$

As demonstrated above, the AIPE is not greater than 2 lb/day for PM<sub>10</sub> 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 SB 288 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.

<b>Offset Applicability (lb/year)</b>					
	<b>NO<sub>x</sub></b>	<b>SO<sub>x</sub></b>	<b>PM<sub>10</sub></b>	<b>CO</b>	<b>VOC</b>
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<sub>10</sub> is the only pollutant of concern in this project. Therefore, calculations for only PM<sub>10</sub> emissions are required.

Per Rule 2201, 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.

$$\text{Offsets Required (lb/year)} = (\Sigma[\text{PE2} - \text{BE}] + \text{ICCE}) \times \text{DOR}, \text{ for all new or modified emissions units in the project}$$

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, Section 4.8

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:

$$\text{Offsets Required (lb/year)} = ([\text{PE2} - \text{BE}] + \text{ICCE}) \times \text{DOR}$$

$$\begin{aligned} \text{PE2 (PM}_{10}\text{)} &= 843 \text{ lb/year} \\ \text{BE (PM}_{10}\text{)} &= 843 \text{ lb/year} \\ \text{ICCE} &= 0 \text{ lb/year} \end{aligned}$$

$$\begin{aligned} \text{Offsets Required (lb/year)} &= ([843 - 843]) \times \text{DOR} \\ &= 0 \text{ lb PM}_{10}\text{/year} \end{aligned}$$

As demonstrated in the calculation above, the amount of offsets is zero; therefore, offsets will not be 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 SSPE 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 PE greater than 100 pounds during any one day for any pollutant will trigger public noticing requirements. There are no new emissions units associated with this project. Therefore public noticing is not required for this project for PE > 100 lb/day.

#### 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 <sub>x</sub>	> 20,000	> 20,000	20,000 lb/year	No
SO <sub>x</sub>	> 54,750	> 54,750	54,750 lb/year	No
PM <sub>10</sub>	> 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 Stationary Source Increase in Permitted Emissions (SSIPE) of more than 20,000 lb/year of any affected pollutant. According to District policy, the SSIPE is calculated as the Post Project Stationary Source Potential to Emit (SSPE2) minus the Pre-Project Stationary Source Potential to Emit (SSPE1), i.e. SSIPE = SSPE2 - SSPE1. The SSIPE is compared to the SSIPE Public Notice threshold of 20,000 lb/year 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 <sub>x</sub>	0	0	0	No
SO <sub>x</sub>	0	0	0	No
PM <sub>10</sub>	843	843	0	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)**

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 and contained in or enforced by the

latest PTO and enforceable, in a practicable manner, on a daily basis. DELs are also required to enforce the applicability of BACT.

#### Proposed Rule 2201 (DEL) Conditions

- Controlled PM10 emissions from the dust collectors shall not exceed 0.0001 gr/scf. [District Rule 2201]
- Controlled PM10 emissions from Donaldson Torit Downflo (DFO 2-16) and Donaldson Torit (100 PJD-8) dust collectors shall not exceed 0.001 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 PM10 emissions of 30 pounds per day or greater must be tested upon initial start-up. Units with PM10 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<sub>10</sub> 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 the 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.

As demonstrated above, there are no increases in emissions associated with this project, therefore a health risk assessment is not necessary and no further risk analysis is required.

### **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<sub>10</sub> 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:

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

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

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

The operation has a maximum Post Project Potential to Emit (PE2) of 0.1 lb/hr (2.3 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 the activity will occur at an existing facility and the project involves negligible expansion of the existing use. Furthermore, the District determined that the activity will not have a significant effect on the environment. The District finds that the activity is categorically exempt from the provisions of CEQA pursuant to CEQA Guideline § 15031 (Existing Facilities), and finds that the project is exempt per the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment (CEQA Guidelines §15061(b)(3)).

**IX. Recommendation**

Compliance with all applicable rules and regulations is expected. Issue Authority to Construct permit C-801-3-11 subject to the permit conditions on the attached draft Authority to Construct permit in Attachment B.

**X. Billing Information**

<b>Annual Permit Fees</b>			
<b>Permit Number</b>	<b>Fee Schedule</b>	<b>Fee Description</b>	<b>Annual Fee</b>
C-801-3-11	3020-05-F	544,349 gallons	\$278.00

**Attachments**

- A. Current PTO
- B. Draft ATC Permit

**Attachment A**  
**Current Permit to Operate (PTO)**

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-801-3-7

**EXPIRATION DATE:** 01/31/2015

**EQUIPMENT DESCRIPTION:**

RAW MATERIAL HANDLING INCLUDING UNLOADING, BATCH WEIGHING AND MIXING, AND MIXED BATCH STORAGE SERVED BY DONALDSON MBT 81-10, DONALDSON TORIT DOWNFLO MODEL #DFO 2-16, DONALDSON TORIT MODEL #100 PJD-8, AND TWO FLEX KLEEN DUST COLLECTORS

## PERMIT UNIT REQUIREMENTS

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1. Visible emissions from each baghouse shall not exceed 5% opacity for a period of periods aggregating more than three minutes in any one hour. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Material removed from each dust collector shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 4102]
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 Rule 4102]
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. Each baghouse shall be maintained and operated according to manufacturer's specifications. [District NSR Rule] Federally Enforceable Through Title V Permit
6. The cleaning frequency and duration for each baghouse shall be adjusted to optimize the control efficiency. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Replacement bags numbering at least 10% of the total number of bags in each baghouse shall be maintained on the premises. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Each 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 NSR Rule] Federally Enforceable Through Title V Permit
9. The baghouses shall operate at all times with a minimum differential pressure of 1 inches water column and a maximum differential pressure of 6 inches water column. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Controlled PM10 emissions from the dust collectors shall not exceed 0.0001 gr/scf. [District NSR Rule] Federally Enforceable Through Title V Permit
11. Controlled PM10 emissions from the Donaldson Torit Downflo (DFO 2-16) and Donaldson Torit (100 PJD-8) dust collectors shall not exceed 0.001 gr/scf. [District NSR Rule] Federally Enforceable Through Title V Permit
12. Differential operating pressure for each baghouse shall be monitored and recorded on each day that the baghouse operates. [District NSR Rule] Federally Enforceable Through Title V Permit
13. Records of all maintenance of each baghouse, including all change outs of filter media, shall be maintained. [District NSR Rule] Federally Enforceable Through Title V Permit
14. Records of daily production of mixed batch material shall be maintained and made available for District inspection upon request. [District Rules 1070 and 2520, 9.3.2] 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.

15. Particulate matter emissions from each source operation shall not exceed the maximum allowable emission rate (lb/hr), as determined using the following formula:  $E = 3.59 \times P^{0.62}$ , where E equals the maximum allowable emission rate (lb/hr) and P equals the process weight rate (tons/hr) and is less than or equal to 30 tons/hr. [District Rule 4202, 4.0] Federally Enforceable Through Title V Permit
16. 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, 13.2] Federally Enforceable Through Title V Permit
17. 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, 9.3.2] Federally Enforceable Through Title V Permit
18. 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, 9.3.2] Federally Enforceable Through Title V Permit
19. 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, 9.3.2] Federally Enforceable Through Title V Permit
20. 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, 9.3.2] Federally Enforceable Through Title V Permit
21. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070 and 2520, 9.4.2] Federally Enforceable Through Title V Permit

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

## **Attachment B**

### **Draft Authority to Construct (ATC) Permit**

San Joaquin Valley  
Air Pollution Control District

**AUTHORITY TO CONSTRUCT**

ISSUANCE DATE: DRAFT  
**DRAFT**

**PERMIT NO:** C-801-3-11

**LEGAL OWNER OR OPERATOR:** SAINT-GOBAIN CONTAINERS, INC  
**MAILING ADDRESS:** 24441 AVENUE 12  
ATTN: ENVIRO MANAGER/S. ARUNAGIRI  
MADERA, CA 93637

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

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF RAW MATERIAL HANDLING INCLUDING UNLOADING, BATCH WEIGHING AND MIXING, AND MIXED BATCH STORAGE SERVED BY DONALDSON MBT 81-10, DONALDSON TORIT DOWNFLO MODEL #DFO 2-16, DONALDSON TORIT MODEL #100 PJD-8, AND TWO FLEX KLEEN DUST COLLECTORS: CORRECT DUST COLLECTOR MODEL NUMBERS FROM TWO FLEX KLEEN DUST COLLECTORS TO TWO DCE DALAMATIC DU-10H-FS DUST COLLECTORS

**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 each baghouse shall not exceed 5% opacity for a period of periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Material removed from each dust collector shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 4102]
5. 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]

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

**DAVID WARNER**, Director of Permit Services

C-801-3-11, Nov 24 2010 5:51PM - TOMS : Joint Inspection NOT Required

6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
7. Each baghouse shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The cleaning frequency and duration for each baghouse shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Replacement bags numbering at least 10% of the total number of bags in each baghouse shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Each 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
11. The baghouses shall operate at all times with a minimum differential pressure of 1 inches water column and a maximum differential pressure of 6 inches water column. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Controlled PM10 emissions from the dust collectors shall not exceed 0.0001 gr/scf. [District Rule 2201] Federally Enforceable Through Title V Permit
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18. 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
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23. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070 and 2520] Federally Enforceable Through Title V Permit

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