



October 29, 2013

Mr. Michael Monschein
Monschein Industries, Inc.
6344 Roselle Avenue, Suite 101
Riverbank, CA 95367-2829

**Re: Proposed Authority to Construct/Certificate of Conformity (Minor Mod)
District Facility # N-3038
Project # N-1133047**

Dear Mr. Monschein:

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. Modification of the woodworking operation to install one chop saw, two drilling/boring machines, three shapers, one sander, one table saw, and one CNC machine along with removing one router.

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. Rupi Gill, Permit Services Manager, at (209) 557-6400.

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Executive Director/Air Pollution Control Officer

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Mr. Michael Monschein
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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

Authority to Construct Application Review

Woodworking Operation

Date: October 23, 2013

Facility Name: Monschein Industries, Inc.
Mailing Address: 6344 Roselle Avenue, Suite 101
Riverbank, CA 95367-2829

Contact Name: Michael Monschein
Phone: (209) 354-5223
Email: hr@4mii.com

Engineer: Kai Chan
Lead Engineer: Nick Peirce
Project Number: N-1133047
Permit Numbers: N-3038-7-9

Deemed Complete: October 11, 2013

I. Proposal

Monschein Industries, Inc. is requesting an Authority to Construct (ATC) permit to modify the existing woodworking operation to install one chop saw, two drilling/boring machines, three shapers, one sander, one table saw, and one CNC machine along with removing one router. The applicant is not proposing a change to the current maximum quantity of sawdust collected by the existing baghouse serving the woodworking equipment due to this proposed project.

Monschein Industries, Inc. is an existing major stationary source and has received their Title V permit. Per Rule 2520, Section 3.20, this proposed project constitutes a minor modification to the facility's Title V permit and may be processed with a Certificate of Conformity (COC). The facility requests that the ATC permit be issued **with** a COC and has submitted a Compliance Certification form (see Appendix C). Therefore, Monschein Industries, Inc. will be required to submit a Title V administrative amendment application prior to operating under this Authority to Construct (ATC) permit.

See Appendix B for a copy of the current Permit to Operate (PTO) N-3038-7-8.

II. Applicable Rules

Rule 2010: Permits Required (12/17/92)
Rule 2201: New and Modified Stationary Source Review Rule (4/21/11)
Rule 2410: Prevention of Significant Deterioration (6/16/11, Effective 11/26/12)
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)

California Health & Safety Code 41700 - Health Risk Assessment
California Health & Safety Code 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 equipment will be operated at 6344 Roselle Avenue, Suite 101 in Riverbank, CA. This facility and its associated equipment are not located within 1,000 feet of a K-12 School. Therefore, the public noticing requirement of California Health and Safety Code 42301.6 is not required for this project.

IV. Process Description

Monschein Industries Inc. is in the business of manufacturing wood cabinets for both industrial and residential use.

The wood parts are manufactured with the proposed woodworking equipment and served by a sawdust collection system vented through a baghouse to capture and control the particulate matter (PM) emitted.

Operating Schedule & Processing Rate:

This equipment may operate up to 10 hours per day and 365 hours/year at a maximum sawdust collection rate of 16,000 lb/day.

V. Equipment Listing

Pre-Project Permit Description:

N-3038-7-8: Woodworking operation consisting of: 5 Chop Saws, 5 Drilling/Boring Machines, 13 Shapers, 5 Pop Up Saws, 3 Miters, 6 Sanders, 2 Band Saws, 3 Table Saws, 1 Jointer, 2 Grinders, 1 Panel Saw, 2 Cross Cut Saws, 3 Moulders, 2 Rip Saws, 2 Edgebanders, 2 Routers, 2 Notchers, 1 Dove Tailer, 2 Hinge Machines, and 1 Denibber all vented to an LMC Model #450-LP-12-T Baghouse

Post-Project Permit Description:

N-3038-7-9: Woodworking operation consisting of 5 Chop Saws, 5 Drilling/Boring Machines, 16 Shapers, 5 Pop Up Saws, 3 Miters, 7 Sanders, 2 Band Saws, 4 Table Saws, 1 Jointer, 2 Grinders, 1 Panel Saw, 2 Cross Cut Saws, 3 Moulders, 2 Rip Saws, 2 Edgebanders, 1 Router, 2 Notchers, 1 Dove Tailer, 2 Hinge Machines, 1 Denibber, and 1 CNC Machine all vented to an LMC Model #450-LP-12-T Baghouse.

Reference Appendix C for a complete list of the woodworking equipment associated with the proposed modified permit unit.

Total Woodworking Equipment Horsepower (hp) Rating: 1,014.1 hp

Control Equipment – Baghouse	
LMC Model 450-LP-12-T	
Quantity	1
Type	Reverse Air Flow
Number of Bags	450
Total Cloth Area	9,000 ft ²
Air Flow Rate	74,000 dscfm
Blower Motor Power Rating	250 hp

$$\begin{aligned} \text{Total HP Rating} &= \text{Woodworking Equipment HP Rating} + \text{Baghouse HP Rating} \\ &= 1,014.1 \text{ hp} + 250.0 \text{ hp} = \mathbf{1,264.1 \text{ hp}} \end{aligned}$$

VI. Emission Control Technology Evaluation

The proposed woodworking equipment will only emit particulate matter including particulate matter with an aerodynamic diameter smaller than or equal to a nominal 10 microns (PM₁₀). This woodworking operation is served by an existing baghouse capable of achieving 99% control of PM₁₀ emissions.

Filter Area: 9,000 ft²
 Max Air Flow: 74,000 cfm

$$\text{Filtering Velocity} = 74,000 \text{ cfm} \div 9,000 \text{ ft}^2 = 7.8 \text{ ft/min}$$

The recommended maximum filtering velocity for sawdust collection in a baghouse, served by a reverse air flow cleaning system, is 12.0 fpm (Reference from Air Pollution Engineering Manual, Air & Waste Management Association –1992 Table 5, page 128). Therefore, the baghouse is operating within the recommended parameters.

VII. General Calculations

A. Assumptions

1. PM₁₀ is the only pollutant that will be emitted from the woodworking operation.
2. 40% of the total particulate matter generated by the woodworking operation is PM₁₀ (CARB speciation manual).
3. The baghouse will control 99% of the PM₁₀ emissions.

B. Emission Factors

According to the applicant, there will not be a change to the current emission rate of 0.0001 lb-PM₁₀/lb of material collected and the sawdust collection limit of 16,000 lb/day due to this proposed project. Therefore:

$$EF_{2PM10} = EF_{1PM10} = 0.0001 \text{ lb-PM}_{10}/\text{lb of material collected}$$

C. Potential to Emit Calculations (PE):

1. Pre-Project Potential Emissions (PE1)

Daily and Annual PE1:

The daily and annual PE1 are from the application review for project #N-1110622. Therefore:

$$\begin{aligned} \text{Daily PE1} &= 1.6 \text{ lb-PM}_{10}/\text{day} \\ \text{Annual PE1} &= 584 \text{ lb-PM}_{10}/\text{year} \end{aligned}$$

2. Post-Project Potential Emissions (PE2)

Daily and Annual PE2:

The applicant is not proposing a change to the baghouse, emission factor, quantity of sawdust collected, or operating schedule due to this proposed project. Therefore:

$$\begin{aligned} \text{Daily PE2}_{\text{PM}_{10}} &= \text{Daily PE1}_{\text{PM}_{10}} = 1.6 \text{ lb-PM}_{10}/\text{day} \\ \text{Annual PE2}_{\text{PM}_{10}} &= \text{Annual PE1}_{\text{PM}_{10}} = 584 \text{ lb-PM}_{10}/\text{year} \end{aligned}$$

D. Increase in Permitted Emissions (IPE):

1. Quarterly Net Emissions Change (QNEC):

The Quarterly Net Emissions Change (QNEC) is used to complete the emissions profile for the District's PAS database. For this permit unit it is assumed that the unit's annual emissions are evenly distributed throughout the year. Therefore, for the proposed modification the QNEC is calculated as follows:

$$\text{QNEC (lb/quarter)} = (\text{Annual PE2} - \text{Annual PE1}) \div 4 \text{ Quarters/year}$$

Pollutant	Annual PE2 (lb/year)	Annual PE1 (lb/year)	Quarterly IPE (lb/quarter)
PM ₁₀	584	584	0

2. Adjusted Increase in Permitted Emissions (AIPE):

The AIPE is used to determine if BACT is required for emission units that are being modified. AIPE will be calculated utilizing the following equations (Ref. Rule 2201, Section 4.3 & 4.4):

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

- Where, AIPE = Adjusted Increase in Permitted Emissions (lb/day)
PE2 = The emissions units post project potential to emit (lb/day)
HAPE = The emissions units Historically Adjusted Potential to Emit (lb/day)

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

Where, PE1 = The emission unit's Potential to Emit prior to modification.
 EF2 = The emission unit's permitted emission factor for the pollutant after modification. If EF2 is greater than EF1 then EF2/EF1 shall be set equal to 1.
 EF1 = The emission unit's permitted emission factor for the pollutant before the modification.

For this proposed modification to the woodworking operation, the applicant is not proposing a change to the emission rate, control efficiency, or control method. The pre and post-project emission factor for the woodworking operation will not change. Therefore:

EF2 = EF1 and EF2 / EF1 = 1
 HAPE = PE1 and PE2 = PE1

AIPE_{PM10} = PE2 – PE1 = **0 lb-PM₁₀/day**

E. Facility Emissions:

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

Pursuant to District Rule 2201 Section 4.9, the 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) that have been banked since September 19, 1991 for Actual Emissions Reductions (AER) that have occurred at the source, and which have not been used on-site. There are no ERCs listed for this facility.

SSPE1 (lb/year)⁽¹⁾					
Permit No.	NOx	CO	VOC	SOx	PM₁₀
N-3038-2-6	584	1,314	49,999 ⁽²⁾	37	7,154
N-3038-4-3	0	0		0	584
N-3038-7-8	0	0		0	584
N-3038-8-1	0	0		0	4,636
N-3864-9-1	0	0		0	219
Total	584	1,314	49,999	37	13,177

2. Post-Project Stationary Source Potential to Emit (SSPE2):

Pursuant to District Rule 2201 Section 4.10, the SSPE2 is calculated on a pollutant by pollutant basis and 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) that have been banked since September 19, 1991 for Actual Emissions Reductions (AER) that have occurred at the source, and which have not been used on-site. There are no ERCs listed for this facility.

¹ Unless otherwise noted, the annual PE for this facility was obtained from project #N-1113483.

² VOC emissions are limited by a facility wide SLC of 49,999 lb/year.

SSPE2 (lb/year)					
Permit No.	NOx	CO	VOC	SOx	PM ₁₀
N-3038-2-6	584	1,314	49,999	37	7,154
N-3038-4-3	0	0		0	584
<i>N-3038-7-9 (ATC Permit)</i>	<i>0</i>	<i>0</i>		<i>0</i>	<i>584</i>
N-3038-8-1	0	0		0	4,636
N-3038-9-1	0	0		0	219
Total	584	1,314	49,999	37	13,177

3. Major Source Determination:

A. 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

There are no ERCs listed for this facility.

Major Source Determination (lb/year)					
	NOx	CO	VOC	PM ₁₀	SOx
Facility Emissions Pre-Project (SSPE1)	584	1,314	49,999	13,177	37
Facility Emissions Post-Project (SSPE2)	584	1,314	49,999	13,177	37
Major Source Determination SSPE2	584	1,314	49,999	13,177	37
Major Source Threshold	20,000	200,000	20,000	140,000	140,000
Major Source	NO	NO	YES	NO	NO

As seen in the table above, the facility is an existing and will continue to be a Major Source for VOC.

B. 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)							
Permit Unit	NO ₂ (as NO _x)	VOC	SO ₂ (as SO _x)	CO	PM	PM ₁₀	CO _{2e}
Total Estimated Facility PE before Project Increase ⁽³⁾	0.29	25.0	0.019	0.66	6.59	6.59	922.6
PSD Major Source Thresholds	250	250	250	250	250	250	100,000
PSD Major Source	N	N	N	N	N	N	N

As shown above, the facility is not an existing major source for PSD for at least one pollutant. Therefore the facility is not an existing major source for PSD.

4. Baseline Emissions:

Pursuant to Rule 2201, Section 3.7, the Baseline Emissions (BE) for a given pollutant is the sum of the following:

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

Based on the SSPE1 and SSPE2 calculations in Section VII.E.1. and E.2., the facility is a major source only for VOC. However, this proposed project is to modify a permit that only generates PM₁₀ emissions and does not affect the facility's VOC emissions. This facility is not a major source for PM₁₀ emissions as previously determined in Section VII.E.3.A. Therefore:

BE_{PM10} = PE_{1PM10} for this permit unit.

5. Stationary Source Project Increase in Permitted Emissions (SSIPE):

SSIPE is used to determine if a project triggers public notification (District Rule 2201, Section 5.4.5). For the proposed project:

SSIPE (for PM₁₀) = SSPE2 – SSPE1

³ The estimated facility annual PE totals are based on the SSPE1 totals as determined above in Section II.F.1. The facility annual PE for CO_{2e} is calculated based on an annual natural gas heat input rate of 1.8 MMBtu/hr × 8,760 hr/year = 15,768 MMBtu/year. Using a CO_{2e} emission factor of 117.018 lb-CO_{2e}/MMBtu: Facility CO_{2e} = 15,768 MMBtu/year × 117.018 lb-CO_{2e}/MMBtu × 1 ton/2,000 lb = 922.6 short ton-CO_{2e}/year

Pollutant	SSPE2 (lb/year)	SSPE1 (lb/year)	SSIPE (lb/year)
PM ₁₀	13,177	13,177	0

F. 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 determined above in Sections VII.E.3.A., this facility is a Major Source only for VOC emissions. However, since this project does not result in any changes in VOC emissions at this source, then this project does not constitute a SB 288 Major Modification.

G. Federal Major Modification:

Rule 2201, Section 3.18 defines Federal Major Modification the same as "Major Modification" as defined in 40 CFR 51.165 and part D of Title I of the CAA.

As determined in Section VII.E.3.A., this facility is a Major Source only for VOC emissions. However, since this project does not result in any changes in VOC emissions at this source, then this project does not constitute a Federal Major Modification. Additionally, since the facility is not a major source for PM₁₀ (140,000 lb/year), it is not a major source for PM_{2.5} (200,000 lb/year).

H. 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:

- 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. As determined in Section VII.E.3.B above in this document, the facility is NOT an existing PSD Major Source.

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.

Potential to Emit for New or Modified Emission Units vs PSD Major Source Thresholds:

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

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.

The estimated project annual PE for PM (assumed to be equal to PM₁₀) and PM₁₀ are based on the Annual PE₂ totals as determined above in Section VII.C.2. The project annual PE for CO₂e is equal to zero since there are no GHG emissions sources for this project.

$$\text{Project Annual PE} = 584 \text{ lb-PM}_{10}/\text{year} \div 1 \text{ ton}/2,000 \text{ lb} = 0.292 \text{ ton-PM}_{10}/\text{year}$$

Project PSD Major Source Determination (tons/year) when operating at Facility N-4997 (Stockton)							
	NO ₂	VOC	SO ₂	CO	PM	PM ₁₀	CO ₂ e
Total PE from New and Modified Units	0	0	0	0	0.292	0.292	0
PSD Major Source Thresholds	250	250	250	250	250	250	100,000
PSD Major Source	No	No	No	No	No	No	No

As shown in the table above, the project potential to emit, by itself, does not exceed any of the PSD major source thresholds. Therefore Rule 2410 is not applicable and no further discussion is required.

VIII. Compliance

Rule 2201 - New and Modified Stationary Source Review Rule

A. Best Available Control Technology (BACT):

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis. Unless exempted pursuant to Section 4.2, BACT is required for the following actions: (1) Any new emissions unit with a potential to emit exceeding 2.0 pounds in any one day, (2) The relocation of an existing emissions unit from one stationary source to another with a potential to emit exceeding 2.0 pounds in any one day, (3) Modifications to an existing emissions unit with a valid Permit to Operate resulting in an Adjusted Increase in Permitted Emissions (AIPE) exceeding 2.0 pounds in any one day, and (4) Any new or modified emissions unit, in a stationary source project, which results in an SB-288 Major Modification or Federal Major Modification as defined in this rule. If the post project Stationary Source Potential to Emit (SSPE₂) for Carbon Monoxide is less than 200,000 pounds per year, BACT is not required for Carbon Monoxide.

Best Available Control Technology (BACT) for Permit Unit N-3038-7-9:

For processing simplicity, it will be assumed that all new and modified woodworking units trigger Best Available Control Technology requirements. The District's BACT Clearinghouse Guideline 8.1.1 (see Appendix D) applies to woodworking operations. As shown in Appendix D, the applicant's use of a baghouse meets the District's BACT requirements for PM₁₀ emissions. Since the applicant is proposing the use of baghouse, BACT requirements for PM₁₀ emissions have been satisfied.

B. Offsets

Offset Applicability

Pursuant to Section 4.5.3, offset requirements shall be triggered on a pollutant-by-pollutant basis, unless exempt per Section 4.6. Offsets are required if the post-project SSPE2 totals equals or exceeds the following offset thresholds for any pollutant:

Pollutant	Offset Thresholds (lb/year)	SSPE2 (lb/year)	Offsets Triggered
PM ₁₀	29,200	13,177	No

The SSPE2 is not equal to or greater than the offset thresholds for PM₁₀ emissions; therefore, offsets are not triggered for PM₁₀.

C. Public Notification

1. Applicability

District Rule 2201, section 5.4, requires a public notification for the affected pollutants from the following types of projects:

- New Major Sources
- SB-288 and Federal Major Modifications
- New emission units with a PE > 100 lb/day of any one pollutant
- Modifications with SSPE1 below an offset threshold and SSPE2 above an offset threshold on a pollutant by pollutant basis (Existing Facility Offset Threshold Exceedance Notification)
- New stationary sources with SSPE2 exceeding offset thresholds (New Facility Offset Threshold Exceedance Notification)
- Any permitting action with a SSIPE exceeding 20,000 lb/yr for any one pollutant. (SSIPE Notice)

a. New Major Source Notice Determination:

A New Major Source is a new facility, which is also a major source. Since this is not a new facility, public noticing is not required for this project for New Major Source purposes.

b. SB-288 and Federal Major Modification Notice Determination:

As determined in Sections VII.F. and G. of this document, this project does not trigger an SB-288 or Federal Major Modification. Therefore, public notice is not required for Federal Major Modification purposes.

c. PE > 100 lb/day Notification:

As determined in Section VII.C.2., the proposed project will not result in the installation of new emission units with a Potential to Emit (PE) greater than 100 lb/day for any pollutant. Therefore, public noticing will not be required for PE > 100 lb/day purposes.

d. Existing Facility - Offset Threshold Notification

Existing facilities with the SSPE1 below the offset threshold resulting in an SSPE2 exceeding the offset threshold due to the proposed project for one or more pollutants will require public noticing. As determined Section VIII.2. above, the SSPE2 for PM₁₀ emissions are less than the offset threshold. There were no thresholds surpassed with this project; therefore, public noticing is not required for offset threshold exceedance purposes.

e. New Facility - Offset Threshold Notification

This is an existing facility. This section does not require a public notification.

f. SSIPE Notification:

A notification is required for any permitting action that results in a SSIPE of more than 20,000 lb/yr of any affected pollutant. As determined in Section VII.E.5. above, the SSIPE for PM₁₀ emissions will be less than 20,000 pounds per year. Therefore, SSIPE notification is not required.

2. Public Notice Action

As indicated above the public noticing requirements are NOT triggered for this project for this project. Therefore, public notification and publication requirements as indicated in Section 5.5 of this rule will NOT be required for this project.

D. Daily Emissions Limits

Daily Emissions Limitations (DELs) and other enforceable conditions are required by Section 3.15 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. Per Sections 3.15.1 and 3.15.2, 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.

For this operation, the following DELs will be placed on the Authority to Construct (ATC) permit and Permit to Operate (PTO) to enforce the requirements of this section:

- *The amount of material collected by the baghouse shall not exceed 16,000 pounds in any one day. [District Rule 2201]*
- *PM₁₀ emissions from the baghouse shall not exceed 0.0001 pounds per pound of material collected. [*

E. Compliance Assurance

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

1. Source Testing

District Policy 1705 (10/9/97) Section II Step 4 requires initial source testing for non-combustion equipment served by a baghouse with expected PM₁₀ emissions of 30 pounds per day or greater. Pursuant to Section VII.C.2. of this document, the PM₁₀ emissions from this permit unit will not exceed 30 pounds per day; therefore, initial source testing will not be required.

2. Monitoring

To ensure compliance with the monitoring requirement, the following conditions will be included on the ATC permit and PTO:

- *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]*
- *The baghouse shall operate at all times with a minimum differential pressure of 1.0 inches water column and a maximum differential pressure of 6 inches water column. [District Rule 2201]*
- *The baghouse differential operating pressure shall be monitored and recorded each day that the woodworking equipment is operated. [District Rule 2201]*

3. Recordkeeping

To ensure compliance with the recordkeeping requirement, the following conditions will be included on the ATC permit and PTO:

- *The permittee shall maintain a daily record of the quantity of material collected by the baghouse (in pounds) and the baghouse differential operating pressure (in inches of water column). [District Rule 2201]*
- *Records of all maintenance of the baghouse system, including all change outs of bags or filter media, shall be maintained. These records shall include identification of the equipment, date of inspection, any corrective action taken, and identification of the personnel performing the inspection. [District Rule 2520, 9.4.2]*

- *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]*

3. Reporting

No applicable District rule or policy requires reporting for the woodworking operation.

Rule 2410 – Prevention of Significant Deterioration (PSD)

As determined above in Section VII.E.3.B., this facility is not an existing major source for PSD for any one pollutant. In addition, as determined above in Section VII.H., the project potential to emit, by itself, does not exceed any of the PSD major source thresholds. Therefore, Rule 2410 is not applicable and no further discussion is required.

Rule 2520 - Federally Mandated Operating Permits

This facility was issued their Title V Operating Permit. The proposed project constitutes a **Minor** Modification to the Title V Permit pursuant to Section 3.20 of this Rule. The applicant has proposed to receive the ATC permit with a Certificate of Conformity in accordance with the requirements of 40 CFR 70.6(c), 70.7 and 70.8. Therefore, the 45-day EPA notice will be conducted prior to the issuance of the ATC.

In accordance with Rule 2520, the application meets the procedural requirements of Section 11.4 by including:

- A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs and
- The source's suggested draft permit (Appendix A of this document) and
- Certification by a responsible official that the proposed modification meets the criteria for use of major permit modification procedures and a request that such procedures be used (Appendix E of this document).

Per section 5.3.2 of this rule, the applicant must submit an application for a Title V permit modification prior to implementing the requested changes. The following federally enforceable conditions will be placed on the ATC permit to ensure compliance with this rule:

- *{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 2520] Y*
- *{1831} Prior to operating with the modifications authorized by this Authority to Construct, the facility shall submit an application for an administrative amendment to its Title V permit, in accordance with District Rule 2520, Section 11.4.2. [District Rule 2520] Y*

Compliance with this rule is expected.

Rule 4101 - Visible Emissions

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 or darker than Ringelmann 1 or equivalent to 20% opacity. Opacity is expected to be less than 20% provided that the equipment is maintained and operated properly.

Per District Policy SSP 1005, the visible emissions from a baghouse/dust collector shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. If the equipment is properly maintained this condition should not be exceeded.

The following conditions will be placed on the ATC permit and PTO to ensure compliance with the visible emission requirements:

- *{15} No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]*
- *Visible emissions from the exhaust of the dust collector shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]*

Compliance is expected with this Rule.

Rule 4102 - Nuisance

As long as the equipment is properly maintained and operated the emission unit will not discharge any air contaminants or other materials which cause injury, detriment, nuisance or annoyance to any considerable number of persons or to the public or which endanger the comfort, repose, health or safety of any such person or public or which cause or have a natural tendency to cause injury or damage to business or property. The following condition will be listed on the ATC permit and PTO to ensure compliance:

- *{98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]*

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 (dated 3/2/01) specifies that for an increase in emissions associated with a proposed new source or modification to an existing emissions unit, the District perform an analysis to determine the possible impact to the nearest resident or worksite.

Since sawdust generated from the non-treated wood is not a toxic air contaminant, this project is not subject to a health risk evaluation and a Health Risk Analysis is not necessary.

Rule 4201 - Particulate Matter Concentration

Section 3.0 of this Rule prohibits the release or discharge into the atmosphere from any single source operation, dust, fumes, or total suspended particulate matter emissions in excess of 0.1 grain per cubic foot of gas at dry standard conditions, as determined by the test methods in section 4.0 of this Rule.

As long as the equipment is properly maintained and operated it is expected that the particulate matter concentration from the exhaust of the baghouse will be:

From the LMC Model #450-LP-12T Baghouse:

Max. Quantity of PM: 4.0 lb-PM/day⁽⁴⁾
 Max. Operating Hours: 10 hr/day (600 min/day)
 Air Flow Rate: 74,000 cfm

$$\begin{aligned} \text{PM Concentration} &= (4.0 \text{ lb-PM/day} \times 7,000 \text{ grains/lb}) \div (74,000 \text{ cfm} \times 600 \text{ min/day}) \\ &= 0.0006 \text{ grains/scf} \end{aligned}$$

Therefore, the particulate matter concentration from the baghouse will not exceed the maximum allowable 0.1 grains/dscf and compliance with this rule is expected.

The following condition will be listed on the ATC permit and PTO to ensure compliance:

- {14} *Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]*

Rule 4202 – Particulate Matter Emission Rate

The purpose of this rule is to limit particulate matter emissions by establishing allowable emission rates. Per section 4.1, particulate matter emissions from any source operation shall not exceed the allowable hourly emission rate as calculated using the following applicable formulas:

$$\begin{aligned} E &= 3.59 \times P^{0.62} \quad - \text{ if } P \leq 30 \text{ tons/hr or} \\ E &= 17.31 \times P^{0.16} \quad - \text{ if } P > 30 \text{ tons/hr} \end{aligned}$$

Where, E = emissions in lb/hr
 P = process weight rate in tons/hr

It is assumed that there is 0.4 lb-PM₁₀ per lb of PM emitted.

ATC Permit Number	Daily PE2 (lb-PM ₁₀ /day)	E _{Proposed} (lb-PM/hr)	P (ton/hr)	E _{Max.} (lb-PM/hr)
N-3038-7-9	1.6	0.4 ⁽⁵⁾	0.8 ⁽⁶⁾	2.0

Since the proposed PM Emission rate is less than the allowable maximum emission rate, the proposed operation is expected to operate in compliance with this rule.

⁴ Assuming that 40% of the PM emitted from the dust collector is emitted as PM₁₀, the total PM emission rate is 1.6 lb-PM₁₀/day ÷ 0.4 lb PM₁₀/lb PM = 4.0 lb-PM/day.

⁵ E_{Proposed} = 1.6 lb-PM₁₀/day ÷ (10 hr/day × 0.4 lb-PM₁₀/lb-PM) = 0.4 lb-PM/hr

⁶ The maximum hourly processing rate for the proposed unit is: 16,000 lb/day ÷ (2,000 lb/ton × 10 hr/day) = 0.8 tons/hr.

California Health & Safety Code 42301.6 (School Notice)

This facility will not be operated within 1,000 feet of a K-12 school site boundary. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not required for this project.

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 project specific emission unit does not trigger 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 N-3038-7-9 subject to the conditions on the attached draft Authority to Construct permits in Appendix A.

X. Billing Information

Permit Number	Fee Schedule	Fee Description	Previous Fee Schedule
N-3038-7-9	3020-01-G	Total Electric Motors: 1,264.1 hp	3020-01-G

XI. Appendices

- Appendix A: Draft Authority to Construct (ATC) Permit N-3038-7-9
- Appendix B: Current Permits to Operate (PTO) N-3038-7-8
- Appendix C: Woodworking Equipment List
- Appendix D: District BACT Clearinghouse Guideline 8.1.1.
- Appendix E: Title V Modification – Compliance Certification Form

APPENDIX A
Draft ATC Permit N-3038-7-9

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

DRAFT
ISSUANCE DATE: DRAFT

PERMIT NO: N-3038-7-9

LEGAL OWNER OR OPERATOR: MONSCHEIN INDUSTRIES INC
MAILING ADDRESS: 6344 ROSELLE AVE STE 101
RIVERBANK, CA 95367

LOCATION: 6344 ROSELLE AVE STE 101
RIVERBANK, CA 95367

EQUIPMENT DESCRIPTION:

MODIFICATION OF WOODWORKING OPERATION TO REMOVE EXISTING WOODWORKING EQUIPMENT AND INSTALL NEW WOODWORKING EQUIPMENT SUCH THAT THE EQUIPMENT DESCRIPTION BECOMES: WOODWORKING OPERATION CONSISTING OF 5 CHOP SAWS, 5 DRILLING/BORING MACHINES, 16 SHAPERS, 5 POP UP SAWS, 3 MITERS, 7 SANDERS, 2 BANDSAWS, 4 TABLE SAWS, 1 JOINTER, 2 GRINDERS, 1 PANEL SAW, 2 CROSS CUT SAWS, 3 MOULDERS, 2 RIP SAWS, 2 EDGE BANDERS, 1 ROUTER, 2 NOTCHERS, 1 DOVE TAILER, 2 HINGE MACHINES, 1 DENIBBER, AND 1 CNC MACHINE ALL VENTED TO AN LMC MODEL #450-LP-12-T BAGHOUSE.

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. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. {15} No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
5. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
6. Visible emissions from the baghouse shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 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
N-3038-7-9 Oct 23 2013 8:03AM - CHANK Joint Inspection NOT Required

7. All ducting from the woodworking equipment to the baghouse shall be properly maintained to prevent fugitive dust emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
8. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
9. 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
10. 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
11. The baghouse shall operate at all times with a minimum differential pressure of 1.0 inches water column and a maximum differential pressure of 6 inches water column. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Material removed from the baghouse shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The quantity of material collected by the baghouse shall not exceed 16,000 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
16. The PM10 emissions shall not exceed 0.0001 pounds per pound of material collected. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The permittee shall maintain a daily record of the quantity of material collected by the baghouse (in pounds) and the baghouse differential operating pressure (in inches of water column). [District Rule 2201] Federally Enforceable Through Title V Permit
18. The dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
19. The dust collector bags shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
20. Records of all maintenance of the dust collector system, including all change outs of bags or filter media, shall be maintained. These records shall include identification of the equipment, date of inspection, any corrective action taken, and identification of the personnel performing the inspection. [District Rule 2520, 9.4.2] 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] Federally Enforceable Through Title V Permit

DRAFT

APPENDIX B
Current Permit to Operate N-3038-7-8

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-3038-7-8

EXPIRATION DATE: 04/30/2017

EQUIPMENT DESCRIPTION:

WOODWORKING OPERATION CONSISTING OF; 5 CHOP SAWS, 5 DRILLING/BORING MACHINES, 13 SHAPERS, 5 POP UP SAWS, 3 MITERS, 6 SANDERS, 2 BAND SAWS, 3 TABLE SAWS, 1 JOINTER, 2 GRINDERS, 1 PANEL SAW, 2 CROSS CUT SAWS, 3 MOULDERS, 2 RIP SAWS, 2 EDGE BANDERS, 2 ROUTERS, 2 NOTCHERS, 1 DOVE TAILER, 2 HINGE MACHINES, AND 1 DENIBBER ALL VENTED TO AN LMC MODEL #450-LP-12-T BAGHOUSE.

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Visible emissions from the baghouse shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
3. All ducting from the woodworking equipment to the baghouse shall be properly maintained to prevent fugitive dust emissions. [District Rule 2201] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
5. 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
6. 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
7. The quantity of material collected by the baghouse shall not exceed 16,000 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The PM10 emissions shall not exceed 0.0001 pounds per pound of material collected. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Material removed from the baghouse shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The differential pressure gauge reading range shall be established per manufacturer's recommendation at time of start up inspection. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201] Federally Enforceable Through Title V Permit
13. A daily log of the quantity of material collected by the baghouse, in pounds, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The dust collection system shall be completely inspected annually while in operation for evidence of particulate matter leaks and repaired as needed. [District Rule 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. The dust collector bags shall be thoroughly inspected annually for tears, scuffs, abrasions, holes, or any evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
16. Records of all maintenance of the dust collector system, including all change outs of bags or filter media, shall be maintained. These records shall include identification of the equipment, date of inspection, any corrective action taken, and identification of the personnel performing the inspection. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
17. 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] Federally Enforceable Through Title V Permit

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

APPENDIX C
Woodworking Equipment List

MAIN DUST COLLECTOR

MANUFACTURER	MODEL	NUMBER OF MOTORS	HORSE POWER	NUMBER OF MOTORS	HORSE POWER	NUMBER OF MOTORS	HORSE POWER	MISCELLANEOUS
DOOR	JET BAND SAW							
DOOR	RODGERS SHAPER	1	1					
DOOR	562	1	1.5					
DOOR	HAMMER'S SHAPER #2	1	1.5	2	1			
DOOR	C.R. ONSRUD SHAPER 2425	1	3					
DOOR	GRIGGIO SHAPER T2000	1	5	1	0.75			
DOOR	HOMEMADE SHAPER	1	5					
DOOR	UNIQUE RAIL SHAPER 310	2	1					
DOOR	UNIQUE RAIL SHAPER 310	2	1					
DOOR	WHIRLWIND POP UP SAW 212	1	5					
DOOR	PANHANS SHAPER TYP230	1	10	1	1			
DOOR	JENKINS SHAPER 945	2	1					
DOOR	BALESTRINI MICRON MITER	1	0.75					
DOOR	BALESTRINI PICO MITER	1	5					
DOOR	BALESTRINI PICO MITER	1	5					
DOOR	WHIRLWIND POP UP SAW 212	1	5					
DOOR	WHIRLWIND POP UP SAW 212	1	5					
DOOR	POWERMATIC TABLE SAWS 68	1	3					
DOOR	POWERMATIC JOINTER 60	1	5					
DOOR	VOORWOOD SHAPER A217	4	7.5	4	1/3			
DOOR	VOORWOOD SHAPER A111	3	3					
DOOR	VOORWOOD SHAPER A111	3	3					
DOOR	VOORWOOD SHAPER A112	4	3					
DOOR	DEWALT CHOP SAWS DW708	1	0.5					
DOOR	RITTER SANDER 4" R703	1	2					
DOOR	BUTFERING SANDER SUPER	2	25					
DOOR	VEIT SANDER 443TM	2	30	2	20	1	1	
DOOR	QUICKWOOD SANDER ELITE 1400	4	2.2					
DOOR	POWERMATIC TABLE SAWS 68	1	3					
CUT OUT	WEIMA GRINDER 45V	1	40					
CUT OUT	HENDRICK USA CROSS CUT SAW 28	1	7.5					
CUT OUT	HENDRICK USA CROSS CUT SAW 28	1	7.5					
CUT OUT	SHELLING PANEL SAW 211/115	1	15	1	5	1	2.5	
MILL	SPEEDMAC MOULDER 623	3	15	4	20			
MILL	SPEEDMAC MOULDER 623	3	15	4	20			
MILL	PLATINUM MOULDER 623	6	15	1	20			
MILL	OPTISAND SANDER VM3539	4	0.5					
MILL	MEREEN JOHNSON RIP SAW 312 DC	1	50					
MILL	PROFIRIP RIP SAW RAIMANN KR 310M	1	35	1	1	2	0.75	
MILL	WEIMA GRINDER 400 S/30	1	40	1	1.5	1	2.5	

MAIN DUST COLLECTOR

	MANUFACTURER	MODEL	NUMBER OF MOTORS	HORSE POWER	NUMBER OF MOTORS	HORSE POWER	NUMBER OF MOTORS	HORSE POWER	MISCELLANEOUS
FF	DIMTER CHOP SAW	OPTICUT 200	1	10					
FF	FASTFRAMER CHOP SAW	V85	1	1	1	2			
FF	CASTLE DRILL AND BORE	60950	1	0.5					
FF	CASTLE DRILL AND BORE	60950	1	0.5					
FF	ITTER SANDER 4"	R903	1	2					
SP. A	WEEKE OPTIMAT	BHC550	1	16					
SP. A	POWERMATIC TABLE SAWS	68	1	3					
SP. A	DEWALT CHOP SAWS	DW708	1	0.5					
NAIL UP	POWERMATIC SHAPER	PF31	1	1					
NAIL UP	JET BAND SAW	JWBS-14CS	1	1					
NAIL UP	HOMAG EDGEBANDER	SE9300	1	1	2	0.75	1	0.5	
NAIL UP	POWERMATIC TABLE SAWS	68	1	3					
NAIL UP	BIESSE ROVER ROUTER	321R	1	5					
NAIL UP	BIESSE DRILL AND ROUTER	SKIPPER 100	4	4	2	5			
NAIL UP	ACCU SYSTEM DRILL	HPJ	1	3					
NAIL UP	PISTORIUS NOTCHER	MN-502	2	5					
NAIL UP	PANHANS SHAPER	TYP 230	1	10					
NAIL UP	ITTER BOERING	R46	2	3					
NAIL UP	ROCKWELL SHAPER	34-450	1	3					
NAIL UP	BRANDT EDGE BANDER	OPTIMAT KD-77-C	6	0.5					
ASSEMB	WHIRLWIND POP UP SAW	212	1	5					
ASSEMB	GANNOMAT HINGE MACHINE	TSX 17	2	1					
ASSEMB	GANNOMAT HINGE MACHINE	TSX 17	2	1					
DRAWER	ITTER SANDER 6"	R903	1	3					
DRAWER	OKAW NOTCHER	MOUNT-A-GLIDE	1	1.5					
DRAWER	MEREEN JOHNSON DOVE TAILER	JJ05-D T/S	1	5	1	3			
DRAWER	WHIRLWIND POP UP SAW	212	1	5					
DRAWER	BIESSE DRILL MACHINE	FSE	1	2					
DRAWER	MARCON DRILL	M9000	1	1					
CATTIN	CATTINAIR DENIBBING	EP2M	2	2	1	3			

	Chop Saw		4
	Drill/Boring		7
	Shapers		16
	Pop up saw		5
	Miters		3
	Sanders		7
	Band saw		2
	Table saw		4
	Jointer		1
	Grinder		2
	Panel saw		1
	Cross cut saw		2
	Moulder		3
	Rip saw		2
	Edge bander		2
	Router		1
	Notcher		2
	Dove tailer		1
	Hinge		2
	Denibber		1
	Weeks (CNC)		1

APPENDIX D
District BACT Clearinghouse Guideline 8.1.1

San Joaquin Valley
Unified Air Pollution Control District

Best Available Control Technology (BACT) Guideline 8.1.1*

Last Update 5/16/1995

**Wood Working Equipment - = or > 30 electric hp of woodworking
equipment or = or > 100 board feet processed/day**

Pollutant	Achieved in Practice or contained in the SIP	Technologically Feasible	Alternate Basic Equipment
PM10	Wood working equipment vented to a baghouse		

BACT is the most stringent control technique for the emissions unit and class of source. Control techniques that are not achieved in practice or contained in a state implementation plan must be cost effective as well as feasible. Economic analysis to demonstrate cost effectiveness is required for all determinations that are not achieved in practice or contained in an EPA approved State Implementation Plan.

***This is a Summary Page for this Class of Source**

APPENDIX E
Title V Modification – Compliance Certification Form

SEP 24 2013

SJVAPCD
NORTHERN REGION

**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
- ADMINISTRATIVE AMENDMENT

COMPANY NAME: <u>Monschein Industries Inc.</u>	FACILITY ID: <u>10-3038</u>
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: <u>Michael Monschein</u>	
3. Agent to the Owner: <u>Lisa M. Hickson</u>	

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

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


Signature of Responsible Official

9/23/13
Date

Michael Monschein
Name of Responsible Official (please print)

President
Title of Responsible Official (please print)