



JUL 07 2015

Mr. Patrick Gollihar
Taft Production Company
P.O. Box 1277
Taft, CA 93268

**Re: Proposed Authority to Construct/Certificate of Conformity (Minor Mod)
District Facility # S-1234
Project # 1144430**

Dear Mr. Gollihar:

Enclosed for your review is the District's analysis of an application for Authorities to Construct for the facility identified above. You requested that Certificates of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. The Authority to Construct permits are to increase material throughput limits for permits S-1234-13, '20 and '21. Also, the permits' annual PM10 emissions will be limited via a specific limiting condition (SLC).

After addressing all comments made during the 45-day EPA comment period, the District intends to issue the Authorities to Construct with Certificates of Conformity. Prior to operating with modifications authorized by the Authorities 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. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Seyed Sadredin
Executive Director/Air Pollution Control Officer

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Modesto, CA 95356-8718
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Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Arnaud Marjollet', written in a cursive style.

Arnaud Marjollet
Director of Permit Services

Enclosures

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

Rule 4320 Advanced Emission Reduction Options for Boilers, Steam Generators,
 and Process Heaters Greater than 5.0 MMBtu/hr (10/16/08)
Rule 4801 Sulfur Compounds (12/17/92)
CH&SC 41700 Health Risk Assessment
CH&SC 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

The facility is located at 950 Petroleum Club Road in Taft, CA. The equipment is not located within 1,000 feet of the outer boundary of a 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

Taft Production Company produces cat litter at their manufacturing facility in Taft, CA. Taft Production Company grinds and dries Antelope Shale to produce kitty litter. The driers are used to decrease the moisture content of the Antelope Shale from 17 to 25% to 5 to 6%.

V. Equipment Listing

Pre-Project Equipment Description (see PTOs in Appendix B):

- S-1234-13-8: AGRICULTURAL CHEMICALS/MINERALS RECEIVING & STORAGE
 OPERATION
- S-1234-20-3: AGRICULTURAL CHEMICALS/MINERALS RECEIVING & STORAGE
 OPERATION
- S-1234-21-6: PRODUCT DE-DUSTING SYSTEM INCLUDING DEDUSTERS, ADDITIVE BIN,
 BUCKET ELEVATORS, CONVEYORS AND A DUST COLLECTOR

Proposed ATCs:

- S-1234-13-9: MODIFICATION OF AGRICULTURAL CHEMICALS/MINERALS RECEIVING &
 STORAGE OPERATION: **INCREASE DAILY MATERIAL THROUGHPUT
 LIMIT AND DAILY OPERATING HOUR LIMIT, AND ADD AN ANNUAL
 EMISSION LIMIT SHARED BETWEEN S-1234-13, '20 AND '21**
- S-1234-20-4: MODIFICATION OF AGRICULTURAL CHEMICALS/MINERALS RECEIVING &
 STORAGE OPERATION: **INCREASE DAILY MATERIAL THROUGHPUT
 LIMIT, DAILY OPERATING HOUR LIMIT, AND ADD AN ANNUAL EMISSION
 LIMIT SHARED BETWEEN S-1234-13, '20 AND '21**

S-1234-21-7: MODIFICATION OF PRODUCT DE-DUSTING SYSTEM INCLUDING DEDUSTERS, ADDITIVE BIN, BUCKET ELEVATORS, CONVEYORS AND A DUST COLLECTOR: **INCREASE DAILY MATERIAL THROUGHPUT LIMIT AND ADD AN ANNUAL EMISSION LIMIT SHARED BETWEEN S-1234-13, '20 AND '21**

Post Project Equipment Description:

S-1234-13-9: AGRICULTURAL CHEMICALS/MINERALS RECEIVING & STORAGE OPERATION

S-1234-20-4: AGRICULTURAL CHEMICALS/MINERALS RECEIVING & STORAGE OPERATION

S-1234-21-7: PRODUCT DE-DUSTING SYSTEM INCLUDING DEDUSTERS, ADDITIVE BIN, BUCKET ELEVATORS, CONVEYORS AND A DUST COLLECTOR

VI. Emission Control Technology Evaluation

The existing material handling equipment is enclosed and vented to fabric dust collection equipment. The natural gas-fired dryer is vented to a venturi scrubber with mist eliminator. No change in equipment or method of operation is proposed for the existing equipment and the dust collectors. Therefore, a detailed evaluation of the existing control equipment is not required or necessary for this project.

Emissions from the dryers include NO_x, CO, VOC, PM₁₀, and SO_x.

Low-NO_x burners reduce NO_x formation by producing lower flame temperatures (and longer flames) than conventional burners. Conventional burners thoroughly mix all the fuel and air in a single stage just prior to combustion, whereas low-NO_x burners delay the mixing of fuel and air by introducing the fuel (or sometimes the air) in multiple stages. Generally, in the first combustion stage, the air-fuel mixture is fuel rich. In a fuel rich environment, all the oxygen will be consumed in reactions with the fuel, leaving no excess oxygen available to react with nitrogen to produce thermal NO_x. In the secondary and tertiary stages, the combustion zone is maintained in a fuel-lean environment. The excess air in these stages helps to reduce the flame temperature so that the reaction between the excess oxygen with nitrogen is minimized.

The subject dryers will combust natural gas purchased from a utility company or LPG only. Therefore no control of sulfur emissions is proposed.

VII. General Calculations

A. Assumptions

- The subject equipment only emits PM
- S-1234-13's daily material received limit will be increased from 500 tons/day to 600 tons/day; the hourly operating limit will be increased from 20 hours/day to 24 hours/day

- S-1234-20's daily material received limit will be increased from 500 tons/day to 600 tons/day the hourly operating limit will be increased from 20 hours/day to 24 hours/day
- S-1234-21's daily material received limit will be increased from 487.5 tons/day to 1,500 tons/day
- Proposed annual SLC limit for S-1234-13-9, '20-4 and '21-7 equals the sum of the annual PE1's for S-1234-13, '20 and '21.

B. Emission Factors

S-1234-13 and '20		
	lb/hr	Source
Fabric collector #101	0.34	PTO
Truck receiving hopper	2.50	

S-1234-21	
lb/ton	Source
0.0163	PTO

C. Calculations

1. Pre-Project Potential to Emit (PE1)

PE1 S-1234-13 and '20		
	Daily Emissions (lb/day)	Annual Emissions (lb/year)
Fabric collector #101	$0.34 \times 20 = 6.8$	$6.8 \times 365 = 2,482$
Truck receiving hopper	$2.50 \times 20 = 50.0$	$50 \times 365 = 18,250$
Total:	56.8	20,732

PE1 S-1234-21	
Daily Emissions (lb/day)	Annual Emissions (lb/year)
$0.0163 \times 487.5 = 7.9$	2,900

Proposed SLC Limit	
Permit Unit	Annual Emissions (lb/year)
S-1234-13 and '20	20,732
S-1234-21	2,900
Pre-Project PE1 (Proposed SLC Limit)	23,632

2. Post Project Potential to Emit (PE2)

PE2 S-1234-13 and '20		
	Daily Emissions (lb/day)	Annual Emissions (lb/year)
Fabric collector #101	$0.34 \times 24 = 8.2$	$8.2 \times 365 = 2,993$
Truck receiving hopper	$2.50 \times 24 = 60.0$	$60 \times 365 = 21,900$
Total:	68.2	24,893

PE2 S-1234-21	
Daily Emissions (lb/day)	Annual Emissions (lb/year)
$0.0163 \times 1500 = 24.5$	$24.5 \times 365 = 2,900$

PE2 (lb-PM₁₀/year)	
Permit Unit	PM ₁₀
S-1234-13 and '20	24,893
S-1234-21	2,900
Post-Project PE2	27,793
SLC Limit for S-1234-13, '20 and '21	23,632

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

Pursuant to District Rule 2201, 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) which 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.

Facility emissions are already above the Offset and Major Source Thresholds for PM10 emissions; therefore, SSPE1 calculations are not necessary.

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

Pursuant to District Rule 2201, the SSPE2 is the PE from all units with valid ATCs or PTOs at the Stationary Source and the quantity of ERCs which have been banked since September 19, 1991 for AER that have occurred at the source, and which have not been used on-site.

Since facility emissions are already above the Offset and Major Source Thresholds for PM10 emissions, SSPE calculations do not include permits with PM10 only that are not part of the proposed SLC.

Facility emissions are already above the Offset and Major Source Thresholds for PM10 emissions; therefore, SSPE2 calculations are not necessary.

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

This source is an existing Major Source for PM10 emissions and will remain so. No change in other pollutants are proposed or expected as a result of this project.

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)(iii). Therefore the PSD Major Source threshold is 250 tpy for any regulated NSR pollutant.

PSD Major Source Determination (tons/year)						
	NO2	VOC	SO2	CO	PM	PM10
Estimated Facility PE before Project Increase	27.7	10.1	5.9	71.5	<250	<250
PSD Major Source Thresholds	250	250	250	250	250	250
PSD Major Source ? (Y/N)	n	n	n	n	n	n

As shown above, the facility is not an existing PSD major source for any regulated NSR pollutant expected to be emitted at this facility.

6. Baseline Emissions (BE)

The BE calculation (in lb/year) is performed pollutant-by-pollutant for each unit within the project to determine the amount of offsets required.

Pursuant to District Rule 2201, BE = PE1 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 District Rule 2201.

As shown in Section VII.C.5 above, the facility is a Major Source for PM10.

a. BE

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.

BACT guidelines 8.4.1 and 8.4.3 apply to S-1234-13, 20 and '21's material receiving, storing and handling equipment. This equipment is enclosed and served by a baghouse which is Achieved in Practice BACT; therefore, BE=PE1 for PM10 for S-1234-2, '13, '14, '20 and '21'.

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."

Since this facility is a major source for NOx, PM10 and VOC the project's PE2 is compared to the SB 288 Major Modification Thresholds in the following table in order to determine if the SB 288 Major Modification calculation is required.

SB 288 Major Modification Thresholds			
Pollutant	Project PE2 (lb/year)	Threshold (lb/year)	SB 288 Major Modification Calculation Required?
NO _x	0	50,000	n
PM ₁₀	23,632	30,000	n
VOC	0	50,000	n

Since none of the SB 288 Major Modification Thresholds are surpassed with this project, this project does not constitute an SB 288 Major Modification.

8. Federal Major Modification

District Rule 2201 states that a Federal Major Modification is the same as a “Major Modification” as defined in 40 CFR 51.165 and part D of Title I of the CAA.

The determination of Federal Major Modification is based on a two-step test. For the first step, only the emission *increases* are counted. Emission decreases may not cancel out the increases for this determination.

Step 1

For existing emissions units, the increase in emissions is calculated as follows.

$$\text{Emission Increase} = \text{PAE} - \text{BAE} - \text{UBC}$$

Where: PAE = Projected Actual Emissions, and
BAE = Baseline Actual Emissions
UBC = Unused baseline capacity

The applicant has provided the required historical and projected operation data (see Appendix C).

The project's combined total emission increases are calculated below and compared to the Federal Major Modification Thresholds in the following table.

PAE = 6,876
BAE = 3,900
Emission Increase = 6,876 – 3,900 = 2,976

Federal Major Modification Thresholds for Emission Increases			
Pollutant	Total Emissions Increases (lb/yr)	Thresholds (lb/yr)	Federal Major Modification?
NO _x	0	0	N
VOC	0	0	N
PM ₁₀	2,976	30,000	N
PM _{2.5}	2,976	20,000	N
SO _x	0	80,000	N

Note: PM2.5 conservatively assumed to be 100% of PM10

Since none of the Federal Major Modification Thresholds are being surpassed with this project, this project does not constitute a Federal Major Modification and no further analysis is required.

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

Rule 2410 applies to any pollutant regulated under the Clean Air Act, except those for which the District has been classified nonattainment. The pollutants which must be addressed in the PSD applicability determination for sources located in the SJV and which are emitted in this project are: (See 52.21 (b) (23) definition of significant)

I. Project Emissions Increase - New Major Source Determination

The post-project potentials to emit from all new and modified units are compared to the PSD major source thresholds to determine if the project constitutes a new major source subject to PSD requirements.

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). The PSD Major Source threshold is 250 tpy for any regulated NSR pollutant.

PSD Major Source Determination: Potential to Emit (tons/year)						
	NO2	VOC	SO2	CO	PM	PM10
Total PE from New and Modified Units	12.2	1.1	4.1	69.5	65.6	65.6
PSD Major Source threshold	250	250	250	250	250	250
New PSD Major Source?	n	n	n	n	n	n

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

10. Quarterly Net Emissions Change (QNEC)

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

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. Unless specifically exempted by Rule 2201, BACT shall be required for the following actions*:

- 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 an SB 288 Major Modification or a Federal Major Modification, as defined by the rule.

*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 – 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 units – 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 – AIPE > 2 lb/day

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

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 PE 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

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

S-1234-13 and '20:

$$\begin{aligned} \text{PM10 AIPE} &= 68.2 - (56.8 * (1)) \\ &= \mathbf{11.4 \text{ lb/day}} \end{aligned}$$

As demonstrated above, S-1234-13's AIPE is greater than 2.0 lb/day for PM10. Therefore BACT is triggered for PM10.

S-1234-21:

$$\begin{aligned} \text{PM10 AIPE} &= 24.5 - (7.9 * (1)) \\ &= \mathbf{16.6 \text{ lb/day}} \end{aligned}$$

As demonstrated above, S-1234-21's AIPE is greater than 2.0 lb/day for PM10. Therefore BACT is triggered for PM10.

d. SB 288/Federal Major Modification

As discussed in Sections VII.C.7 and VII.C.8 above, this project does not constitute an SB 288 and/or Federal Major Modification. Therefore BACT is not triggered for any pollutant.

2. BACT Guideline

BACT Guideline 8.4.3 applies to chemicals/minerals receiving & storage operations of S-1234-13, '20 and '21. [Dry Material Handling Operation - Mixing, Blending, Milling, or Storage] (See Appendix D)

3. Top-Down BACT Analysis

Per Permit Services Policies and Procedures for BACT, a Top-Down BACT analysis shall be performed as a part of the application review for each application subject to the BACT requirements pursuant to the District's NSR Rule.

Pursuant to the attached Top-Down BACT Analysis (see Appendix D), BACT has been satisfied with the following:

- Mixer, augers, elevators, conveyors all enclosed and vented to a fabric filter baghouse, or equivalent (99% or greater control efficiency)

B. Offsets

1. Offset Applicability

Offset requirements shall be triggered on a pollutant by pollutant basis and shall be required if the SSPE2 equals to or exceeds the offset threshold levels in Table 4-1 of Rule 2201.

The SSPE2 is compared to the offset thresholds in the following table.

Offset Determination (lb/year)	
	PM ₁₀
SSPE2	>29,200
Offset Thresholds	29,200
Offsets triggered?	y

2. Quantity of Offsets Required

As seen above, the SSPE2 is greater than the offset thresholds for NO_x, PM₁₀ and VOC only. Therefore offset calculations will be required for this project.

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

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

Where,

PE2 = Post Project Potential to Emit, (lb/year)

BE = Baseline Emissions, (lb/year)

ICCE = Increase in Cargo Carrier Emissions, (lb/year)

DOR = Distance Offset Ratio, determined pursuant to Section 4.8

BE = PE1 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 = HAE

As calculated in Section VII.C.6 above, the BE from the equipment in this project is equal to PE1 since the units are Clean Emissions Units. Also, there are no increases in cargo carrier emissions; therefore offsets can be determined as follows:

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

PE1 (lb/year)	
Permit Unit	PM ₁₀
PE1 (BE)	23,632
PE2 (SLC Limit)	23,632
PE2 - BE =	0

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.
- e. Any project which results in a Title V significant permit modification

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 SSPE1 and SSPE2 are compared to the offset thresholds in the following table.

Offset Thresholds				
Pollutant	SSPE1 (lb/year)	SSPE2 (lb/year)	Offset Threshold	Public Notice Required?
NO _x	0	0	20,000 lb/year	No
SO _x	0	0	54,750 lb/year	No
PM ₁₀	>29,200	>29,200	29,200 lb/year	No
CO	0	0	200,000 lb/year	No
VOC	0	0	20,000 lb/year	No

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

d. SSIPE > 20,000 lb/year

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

SSIPE Public Notice Thresholds					
Pollutant	PE2 (lb/year)	PE1 (lb/year)	SSIPE (lb/year)	SSIPE Public Notice Threshold	Public Notice Required?
NO _x	0	0	0	20,000 lb/year	No
SO _x	0	0	0	20,000 lb/year	No
PM ₁₀	23,632	23,632	0	20,000 lb/year	No
CO	0	0	0	20,000 lb/year	No
VOC	0	0	0	20,000 lb/year	No

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

e. Title V Significant Permit Modification

As shown in the Discussion of Rule 2520 below, this project does not constitute a Title V significant modification. Therefore, public noticing for Title V significant modifications is not required for this project.

2. Public Notice Action

As discussed above, this project will not result in emissions, for any 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.

For this IC engine, the DELs are stated in the form of emission factors (g/hp-hr or lb/MMBtu), the maximum engine horsepower rating, and the maximum operational time of 24 hours per day.

Proposed Rule 2201 (DEL) Conditions:

S-1234-13-9 and '20-4:

- Operation of all equipment included with this permit unit shall not exceed 24 hours on any day. [District NSR Rule] Y
- Fugitive particulate matter emissions from truck receiving hopper shall not exceed 2.50 lbm per hour. [District NSR Rule and District Rule 4202, 4.0] Y
- Particulate matter emissions from fabric collector #101 shall not exceed 0.34 lbm per hour. [District NSR Rule and District Rule 4202, 4.0] Y

S-1234-21-7:

- Total weight of all materials introduced into this permit unit shall not exceed 1,500 tons per day. [District NSR Rule] Y
- PM10 emission rate for permit unit shall not exceed 0.0163 lb-PM10 per ton of material processed. [District NSR Rule and District Rule 4202, 4.0] Y

E. Compliance Assurance

1. Source Testing

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 condition(s) are listed on the permit to operate:

S-1234-13-9:

Records of dust collection system maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2 and 40 CFR 64] Y

The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR 64.9. [40 CFR 64] Y

{2426} The permittee shall maintain, and make available for District inspection, all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] Y

4. Reporting

No reporting is required to demonstrate compliance with Rule 2201.

Rule 2410 Prevention of Significant Deterioration

As shown in Section VII. C. 9. above, this project does not result in a new PSD major source or PSD major modification. No further discussion is required.

Rule 2520 Federally Mandated Operating Permits

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 a minor modification, prior to operating with the proposed modifications. Continued compliance with this rule is expected. The facility may construct/operate under the ATC upon submittal of the Title V minor modification application.

Rule 4001 New Source Performance Standards (NSPS) - Subpart OOO (April 14, 1999)

Subpart OOO applies to equipment and operations at nonmetallic mineral processing plants for which construction, modification, or reconstruction has commenced. Current PTOs for S-1234-13, '20 and '21 include conditions requiring compliance with the provisions of 40 CFR 60, Subpart OOO. These conditions remain in effect and will be included on the requested ATCs issued for this project. Therefore, initial and ongoing compliance is expected.

Rule 4101 Visible Emissions

Rule 4101 states that no person shall discharge into the atmosphere emissions of any air contaminant aggregating more than 3 minutes in any hour which is as dark as or darker than Ringelmann 1 (or 20% opacity). The proposed modifications are not expected to adversely affect compliance with the requirements of this rule. Also, based on past inspections of the facility continued compliance is expected.

Rule 4102 Nuisance

Rule 4102 prohibits discharge of air contaminants which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected as a result of these operations, provided the equipment is well maintained. Therefore, compliance with this rule is expected.

California Health & Safety Code 41700 (Health Risk Assessment)

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

An HRA is not required for a project with a total facility prioritization score of less than or equal to one. According to the Technical Services Memo for this project (**Appendix E**), the total facility prioritization score including this project was less than or equal to one. Therefore, no future analysis is required to determine the impact from this project and compliance with the District's Risk Management Policy is expected.

Discussion of T-BACT

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

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 subject equipment is currently in compliance with the requirements of this rule and the proposed modifications are not expected to affect compliance.

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)

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 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; and
- 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.

Greenhouse Gas (GHG) Significance Determination

It is determined that no other agency has or will prepare an environmental review document for the project. Thus the District is the Lead Agency for this project.

The District's engineering evaluation (this document) demonstrates that the project would not result in an increase in project specific greenhouse gas emissions. The District therefore concludes that the project would have a less than cumulatively significant impact on global climate change.

District CEQA Findings

The District is the Lead Agency for this project because there is no other agency with broader statutory authority over this project. 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 § 15301 (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. Pending a successful NSR Public Noticing period, issue ATCs S-1234-13-9, '20-4 and '21-7 subject to the permit conditions on the attached draft ATC in **Appendix F**.

X. Billing Information

Annual Permit Fees			
Permit Number	Fee Schedule	Fee Description	Annual Fee
S-1234-13-9	3020-05 E	153,000 gallons	\$246
S-1234-20-4	3020-05 E	153,713 gallons	\$246
S-1234-21-7	3020-01 D	108 hp	\$314

Appendixes

- A: Quarterly Net Emissions Change
- B: Current PTO(s)
- C: PAE and BAE Calculations
- D: BACT Guideline and BACT Analysis
- E: HRA Summary
- F: Draft ATC

APPENDIX A
Quarterly Net Emissions Change (QNEC)

Permit #: S-1234-13-9	Last Updated
Facility: TAFT PRODUCTION COMPANY	06/22/2015 TORID

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	23632.0	0.0	0.0
Daily Emis. Limit (lb/Day)	0.0	0.0	68.2	0.0	0.0
Quarterly Net Emissions Change (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-1234-20-4	Last Updated
Facility: TAFT PRODUCTION COMPANY	06/22/2015 TORID

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	0.0
Daily Emis. Limit (lb/Day)	0.0	0.0	0.0	0.0	0.0
Quarterly Net Emissions Change (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

Permit #: S-1234-21-7	Last Updated
Facility: TAFT PRODUCTION COMPANY	06/22/2015 TORID

Equipment Pre-Baselined: NO

	<u>NOX</u>	<u>SOX</u>	<u>PM10</u>	<u>CO</u>	<u>VOC</u>
Potential to Emit (lb/Yr):	0.0	0.0	0.0	0.0	0.0
Daily Emis. Limit (lb/Day)	0.0	0.0	24.5	0.0	0.0
Quarterly Net Emissions Change (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					
Check if offsets are triggered but exemption applies	N	N	N	N	N
Offset Ratio					
Quarterly Offset Amounts (lb/Qtr)					
Q1:					
Q2:					
Q3:					
Q4:					

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:

$$PE2_{\text{quarterly}} = PE2_{\text{annual}} \div 4 \text{ quarters/year}$$

$$PE1_{\text{quarterly}} = PE1_{\text{annual}} \div 4 \text{ quarters/year}$$

Quarterly NEC [QNEC]					
	PE2 (lb-PM10/yr)	PE2 (lb-PM10/qtr)	PE1 (lb-PM10/yr)	PE1 (lb-PM10/qtr)	QNEC (lb-PM10/qtr)
S-1234-13-9	23,632*	5,908	23,632*	5,908	5908
S-1234-20-4					
S-1234-21-4					

*SLC total for S-1234-13, '20 and '21

APPENDIX B
Current PTO

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1234-13-8

EXPIRATION DATE: 03/31/2016

SECTION: 28 **TOWNSHIP:** 32S **RANGE:** 24E

EQUIPMENT DESCRIPTION:

AGRICULTURAL CHEMICALS/MINERALS RECEIVING & STORAGE OPERATION

PERMIT UNIT REQUIREMENTS

1. Operation shall include 20,550 cubic foot capacity raw ore storage silo #102 with Rees 29S wheel fan. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Operation shall include the following equipment shared with PTO #S-1234-20: hopper #101, belt conveyor #101, elevator #101, belt conveyor #102, belt conveyor #103, and #101 fabric collector, model 100S-2-20 with 7.5 hp motor. [District NSR Rule] Federally Enforceable Through Title V Permit
3. No more than 500 tons of material shall be received on any day. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Minimum exhaust duct velocity shall be maintained at 3,840 fpm. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Fabric collector #101 shall be operated whenever storage silos are in operation. [District NSR Rule] Federally Enforceable Through Title V Permit
6. There shall be no detectable emissions except at truck receiving hopper and fabric collector #101. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Particulate matter emissions from belt conveyors and silo vent exhaust shall not exceed 0.058 grams/dscm. [District NSR Rule and District Rule 4201, 3.0] Federally Enforceable Through Title V Permit
8. Operation of all equipment included with this permit unit shall not exceed 20 hours on any day. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Fugitive particulate matter emissions from truck receiving hopper shall not exceed 2.50 lbm per hour. [District NSR Rule and District Rule 4202, 4.0] Federally Enforceable Through Title V Permit
10. Particulate matter emissions from fabric collector #101 shall not exceed 0.34 lbm per hour. [District NSR Rule and District Rule 4202, 4.0] Federally Enforceable Through Title V Permit
11. Accurate daily records of the amount & type of material received and the daily hours of operation shall be maintained, retained for a period of at least five years, and made available for District inspection upon request. [District NSR Rule and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
12. If fabric collector exhibits visible emissions, then PM10 emissions from fabric collectors shall be tested to demonstrate compliance with emissions limits. Sample collection shall be District-witnessed and testing shall be by an independent laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
13. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] 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.

14. The results of each source test, including field data and official test results, shall be submitted to the District within 60 days after collection. [District Rule 1081] Federally Enforceable Through Title V Permit
15. Owner or operator shall not cause to be discharged into the atmosphere from any transfer point on belt conveyors or from any other affected facility any stack emissions which: (1) Contain particulate matter in excess of 0.05 g/dscm (0.022 gr/dscf); or (2) Exhibit greater than 7 percent opacity. [District Rule 4201, 3.0 and 40 CFR 60.672(a)] Federally Enforceable Through Title V Permit
16. Except from truck dumping, owner or operator shall not cause to be discharged into the atmosphere from any transfer point on belt conveyors or from any other affected facility any fugitive emissions which exhibit greater than 10 percent opacity. [40 CFR 60.672(b)] Federally Enforceable Through Title V Permit
17. Visible emissions from dust collector #101 shall not exceed 7% opacity. [40 CFR 60.672(f)] Federally Enforceable Through Title V Permit
18. Testing to demonstrate compliance with the opacity standards in 40 CFR 60.672(a) shall be performed at least annually using EPA Method 9 and the procedures in 40 CFR 60.11. [40 CFR 60.675(b)] Federally Enforceable Through Title V Permit
19. Testing to demonstrate compliance with the particulate matter standards in 40 CFR 60.672(b) shall be performed at least annually using EPA Method 9 and the procedures in \pm 60.11, with the following additions: (i) The minimum distance between the observer and the emission source shall be 4.57 meters (15 feet); (ii) The observer shall, when possible, select a position that minimizes interference from other fugitive emission sources (e.g., road dust). The required observer position relative to the sun (Method 9, Section 2.1) must be followed. [40 CFR 60.675(c)(1)] Federally Enforceable Through Title V Permit
20. Testing to demonstrate compliance with the opacity of stack emissions standards from any baghouse subject to 40 CFR 60.672(f) shall be performed at least annually using EPA Method 9. The duration of the Method 9 observations shall be 1 hour (ten 6-minute averages). [40 CFR 60.675(c)(2)] Federally Enforceable Through Title V Permit
21. When determining compliance with the fugitive emissions opacity standard of 40 CFR 60.672(b), the duration of the Method 9 observations must be 30 minutes (five 6-minute averages). [40 CFR 60.675(c)(3)] Federally Enforceable Through Title V Permit
22. Owner or operator of any affected facility shall submit written reports of the results of all performance tests conducted to demonstrate compliance, including reports of opacity observations made using Method 9 and reports of observations using Method 22. [40 CFR 60.676(f)] Federally Enforceable Through Title V Permit
23. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E = 3.59 \times P^{0.62}$ if P is less than or equal to 30 tons per hour, or $E = 17.31 \times P^{0.16}$ if P is greater than 30 tons per hour. [District Rule 4202, 4.0] Federally Enforceable Through Title V Permit
24. Visible emissions from each dust collector shall be evaluated using EPA method 22 for a period of at least 6 minutes at least once during each day the dust collector is operated. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. Corrective action shall include the following: inspecting the dust collector system for any tears, abrasions, or holes in the filters; inspecting closed duct systems for damage; and repairing or replacing any defective or damaged material. [District Rules 2520, 9.3.2 and 40 CFR 64] Federally Enforceable Through Title V Permit
25. Dust collection system shall be inspected at least quarterly when the unit is not in operation for any tears, abrasions, or holes in the filters; damage to closed duct systems; or any evidence of particulate matter leaks which might interfere with the PM collection efficiency. Any defective or damaged material shall be repaired or replaced as needed. [District Rule 2520, 9.3.2 and 40 CFR 64] Federally Enforceable Through Title V Permit
26. Records of dust collection system maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2 and 40 CFR 64] Federally Enforceable Through Title V Permit
27. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR 64.7. [40 CFR 64] 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.

28. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR 64.9. [40 CFR 64] Federally Enforceable Through Title V Permit
29. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR 64.8. [40 CFR 64] Federally Enforceable Through Title V Permit
30. The permittee shall maintain, and make available for District inspection, all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
31. Compliance with permit conditions in the Title V permit shall be deemed compliance with the applicable requirements of District Rule 4202 (as amended 12/17/92). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
32. Compliance with permit conditions in the Title V permit shall be deemed compliance with the applicable requirements of 40 CFR 60 Subpart OOO. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1234-20-3

EXPIRATION DATE: 03/31/2016

SECTION: 28 **TOWNSHIP:** 32S **RANGE:** 24E

EQUIPMENT DESCRIPTION:

AGRICULTURAL CHEMICALS/MINERALS RECEIVING & STORAGE OPERATION

PERMIT UNIT REQUIREMENTS

1. Operation shall include the following equipment shared with PTO #S-1234-0013: hopper #101, belt conveyors #'s 101-103, 24 in. x 58 in. x 88 ft. elevator #101, and model #1005-2-20 fabric collector #101. [District Rule 2010] Federally Enforceable Through Title V Permit
2. Operation shall include 20,550 cubic ft. raw ore storage silo #101. [District Rule 2010] Federally Enforceable Through Title V Permit
3. No more than 500 tons of material shall be received per day. [District NSR Rule] Federally Enforceable Through Title V Permit
4. Minimum exhaust duct velocity shall be maintained at 3839 fpm. [District NSR Rule] Federally Enforceable Through Title V Permit
5. Fabric collector #101 shall operate whenever process equipment is in operation. [District NSR Rule] Federally Enforceable Through Title V Permit
6. There shall be no detectable emissions except at truck receiving hopper and fabric collector #101. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Operation of this equipment shall not exceed 20 hours per day. [District NSR Rule] Federally Enforceable Through Title V Permit
8. Particulate matter emissions from this permit unit are included with emissions for fabric collector #101 shared with unit #S-1234-13. [District NSR Rule] Federally Enforceable Through Title V Permit
9. Accurate daily records of the amount & type of material received and the daily hours of operation shall be maintained, retained for a period of at least five years, and made available for District inspection upon request. [District NSR Rule and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
10. Owner or operator shall not cause to be discharged into the atmosphere from any transfer point on belt conveyors or from any other affected facility any stack emissions which: (1) Contain particulate matter in excess of 0.05 g/dscm (0.022 gr/dscf); or (2) Exhibit greater than 7 percent opacity. [District Rule 4201, 3.0 and 40 CFR 60.672(a)] Federally Enforceable Through Title V Permit
11. Except from truck dumping, owner or operator shall not cause to be discharged into the atmosphere from any transfer point on belt conveyors or from any other affected facility any fugitive emissions which exhibit greater than 10 percent opacity. [40 CFR 60.672(b)] Federally Enforceable Through Title V Permit
12. Visible emissions from fabric collector #101 shall not exceed 7% opacity. [40 CFR 60.672(f)] Federally Enforceable Through Title V Permit

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

13. Testing to demonstrate compliance with the opacity standards in 40 CFR 60.672(a) shall be performed at least annually using EPA Method 9 and the procedures in 40 CFR 60.11. [40 CFR 60.675(b)] Federally Enforceable Through Title V Permit
14. Testing to demonstrate compliance with the particulate matter standards in 40 CFR 60.672(b) shall be performed at least annually using EPA Method 9 and the procedures in ¹ 60.11, with the following additions: (i) The minimum distance between the observer and the emission source shall be 4.57 meters (15 feet); (ii) The observer shall, when possible, select a position that minimizes interference from other fugitive emission sources (e.g., road dust). The required observer position relative to the sun (Method 9, Section 2.1) must be followed. [40 CFR 60.675(c)(1)] Federally Enforceable Through Title V Permit
15. Testing to demonstrate compliance with the opacity of stack emissions standards from any baghouse subject to 40 CFR 60.672(f) shall be performed at least annually using EPA Method 9. The duration of the Method 9 observations shall be 1 hour (ten 6-minute averages). [40 CFR 60.675(c)(2)] Federally Enforceable Through Title V Permit
16. When determining compliance with the fugitive emissions opacity standard of 40 CFR 60.672(b), the duration of the Method 9 observations must be 30 minutes (five 6-minute averages). [40 CFR 60.675(c)(3)] Federally Enforceable Through Title V Permit
17. Owner or operator of any affected facility shall submit written reports of the results of all performance tests conducted to demonstrate compliance, including reports of opacity observations made using Method 9 and reports of observations using Method 22. [40 CFR 60.676(f)] Federally Enforceable Through Title V Permit
18. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E = 3.59 \times P^{0.62}$ if P is less than or equal to 30 tons per hour, or $E = 17.31 \times P^{0.16}$ if P is greater than 30 tons per hour. [District Rule 4202, 4.0] Federally Enforceable Through Title V Permit
19. Visible emissions from each dust collector shall be evaluated using EPA method 22 for a period of at least 6 minutes at least once during each day the dust collector is operated. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. Corrective action shall include the following: inspecting the dust collector system for any tears, abrasions, or holes in the filters; inspecting closed duct systems for damage; and repairing or replacing any defective or damaged material. [District Rules 2520, 9.3.2 and 40 CFR 64] Federally Enforceable Through Title V Permit
20. Dust collection system shall be inspected at least quarterly when the unit is not in operation for any tears, abrasions, or holes in the filters; damage to closed duct systems; or any evidence of particulate matter leaks which might interfere with the PM collection efficiency. Any defective or damaged material shall be repaired or replaced as needed. [District Rule 2520, 9.3.2 and 40 CFR 64] Federally Enforceable Through Title V Permit
21. Records of dust collection system maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2 and 40 CFR 64] Federally Enforceable Through Title V Permit
22. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR 64.7. [40 CFR 64] Federally Enforceable Through Title V Permit
23. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR 64.9. [40 CFR 64] Federally Enforceable Through Title V Permit
24. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR 64.8. [40 CFR 64] Federally Enforceable Through Title V Permit
25. The permittee shall maintain, and make available for District inspection, all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
26. Compliance with permit conditions in the Title V permit shall be deemed compliance with the applicable requirements of District Rule 4202 (as amended 12/17/92). A permit shield is granted from these requirements. [District Rule 2520, 13.2] 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.

27. Compliance with permit conditions in the Title V permit shall be deemed compliance with the applicable requirements of 40 CFR 60 Subpart OOO. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1234-21-6

EXPIRATION DATE: 03/31/2016

SECTION: 28 **TOWNSHIP:** 32S **RANGE:** 24E

EQUIPMENT DESCRIPTION:

PRODUCT DE-DUSTING SYSTEM INCLUDING DEDUSTERS, ADDITIVE BIN, BUCKET ELEVATORS, CONVEYORS AND A DUST COLLECTOR

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is dark or darker than Ringelmann 1/2 or equivalent to 10% opacity. [District NSR Rule] Federally Enforceable Through Title V Permit
2. Additive shall be received in bags and hand dumped into 64 cu.ft. bin with visible emissions less than 10% opacity. [District NSR Rule] Federally Enforceable Through Title V Permit
3. Operation shall include: two 20 hp deduster units #D1 and D2, one 5 hp bucket elevator #E18, and two 3 hp conveyors #C20 and C21. [District Rule 2010] Federally Enforceable Through Title V Permit
4. Operation shall include: one additive bin with one 2 hp bucket elevator #E19, and one Ultra Industries, model ND-300, dust collector #DC5 equipped with 50 hp blower. [District Rule 2010] Federally Enforceable Through Title V Permit
5. All material transfer points approved shall be enclosed. [District NSR Rule] Federally Enforceable Through Title V Permit
6. Deduster units #D1 and D2 shall be enclosed and vented exclusively to dust collector #DC5. [District NSR Rule] Federally Enforceable Through Title V Permit
7. Total weight of all materials introduced into this permit unit shall not exceed 487.5 tons per day. [District NSR Rule] Federally Enforceable Through Title V Permit
8. PM10 emission rate for permit unit shall not exceed 0.0163 lb-PM10 per ton of material processed. [District NSR Rule and District Rule 4202, 4.0] Federally Enforceable Through Title V Permit
9. Dust collector #DC5 shall be maintained with a minimum filter area of 4,590 sq. ft. [District NSR Rule] Federally Enforceable Through Title V Permit
10. Material removed from dust collector #DC5 shall be handled in a manner preventing entrainment into the atmosphere (less than 10% opacity). [District NSR Rule] Federally Enforceable Through Title V Permit
11. Permittee shall keep accurate records of material processed on a daily basis, and shall make such records readily available for District inspection for a period of at least five years. [District NSR Rule and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
12. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E = 3.59 \times P^{0.62}$ if P is less than or equal to 30 tons per hour, or $E = 17.31 \times P^{0.16}$ if P is greater than 30 tons per hour. [District Rule 4202, 4.0] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

13. Visible emissions from each dust collector shall be evaluated using EPA method 22 for a period of at least 6 minutes at least once during each day the dust collector is operated. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. Corrective action shall include the following: inspecting the dust collector system for any tears, abrasions, or holes in the filters; inspecting closed duct systems for damage; and repairing or replacing any defective or damaged material. [District Rules 2520, 9.3.2; 4201, 3.0; and 40 CFR 64] Federally Enforceable Through Title V Permit
14. Dust collection system shall be inspected at least quarterly when the unit is not in operation for any tears, abrasions, or holes in the filters; damage to closed duct systems; or any evidence of particulate matter leaks which might interfere with the PM collection efficiency. Any defective or damaged material shall be repaired or replaced as needed. [District Rule 2520, 9.3.2 and 40 CFR 64] Federally Enforceable Through Title V Permit
15. Records of dust collection system maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2 and 40 CFR 64] Federally Enforceable Through Title V Permit
16. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR 64.7. [40 CFR 64] Federally Enforceable Through Title V Permit
17. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR 64.9. [40 CFR 64] Federally Enforceable Through Title V Permit
18. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR 64.8. [40 CFR 64] Federally Enforceable Through Title V Permit
19. The permittee shall maintain, and make available for District inspection, all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
20. Compliance with permit conditions in the Title V permit shall be deemed compliance with the applicable requirements of District Rule 4202 (as amended 12/17/92). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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

APPENDIX C
PAE and BAE Calculations

June 15, 2015

David Torii, P.E.
Permit Services Division
San Joaquin Valley Air Pollution Control District
34946 Flyover Court
Bakersfield, CA 93308-9725
Work: 661-392-5620
Fax: 661-392-5585
E-mail: David.Torii@ValleyAir.Org

Subject: FMM Calculations: Taft Production Company Project 1144430

Dear Mr. Torii:

It is our understanding that Taft Production Company (Taft) Project 1144430 is deficient for Federal Major Modification (FMM) calculations for NOx, VOC, and PM10. This project requests a modification to increase daily fuel and/or material received limits and daily operation limits for S-1234-2-26, S-1234-13-8, S-1234-14-12, S-1234-20-3, and S1234-21-6.

Per our phone conversation of June 11, 2015, enclosed are the FMM calculations for this project, prepared and presented as per our discussion. The emissions have been summarized below and also are detailed in Attachment 1.

FMM EVALUATION

It is our understanding that Taft Project 1144430, which is a modification of the permits for five sources due to throughput increases, requires evaluation of project status relative to FMM thresholds for NOx, VOC, and PM10. The FMM threshold analysis, in general, considers the difference between the projected actual emissions (PAE) and baseline actual emissions (BAE) compared to the FMM significance threshold levels as outlined in SJVAPCD Rule 2201, 3.18.1.4, Table 3-1, as shown in Table 1 below:

Table 1, Significance Thresholds

SJVAPCD Rule 2201, 3.18.1.4, Table 3-1, Significance Thresholds	
POLLUTANT	THRESHOLD (POUNDS PER YEAR)
VOC	0
NOx	0
PM2.5	20,000 of direct PM2.5 emissions or
	80,000 of sulfur dioxide emissions or

SJVAPCD Rule 2201, 3.18.1.4, Table 3-1, Significance Thresholds	
	80,000 of nitrogen oxide emissions
PM10	30,000
SOx	80,000

For this project, only NOx, VOC, and PM10 thresholds will be evaluated.

FMM CALCULATIONS

BAE is the baseline actual emissions in pounds per year based on any 24 month period selected by the operator within the previous 10 year period. For this project, the BAE was determined for Device I.D. numbers 2, 13, 14, 20, and 21 using the emissions as provided in the Emissions Statement – Calendar Year 2013 and Emissions Statement – Calendar Year 2014 (Attachment 2). BAE for each source was calculated by summing the calendar year 2013 and 2014 tons per year emissions for the designated pollutant from the emission source being modified, dividing by half and converting the result to pounds per year to obtain an annual average emissions in pounds per year. The total BAE for all sources under consideration was estimated by summing the annual averages of the sources proposed for modification.

Per our discussion, the projected actual emissions (PAE) are most accurately determined by applying the proposed production or fuel throughput percentage increase to the individual source annual average emission and summing the increased emissions for all sources being modified.

Attachment 1 provides a detail of the calculations for FMM for Taft Project 1144430 and the table below summarizes the results of the detailed FMM calculations:

POLLUTANT	THRESHOLD (POUNDS PER YEAR)	PAE (lb/yr)	BAE (lb/yr)	PAE-BAE (lb/yr)	Threshold Exceeded?
VOC	0	7,784	6,660	1,124	Yes
NOx	0	7,784	6,660	1,124	Yes
PM10	30,000	28,957	22,760	6,197	No

CONCLUSION

The FMM calculations demonstrate that the FMM threshold for NOx and VOC is exceeded but the FMM threshold for PM10 is not exceeded.

David Torii, P.E.
June 15, 2015
Page 3 of 3

Should you have any questions or concerns, please contact me at (415) 897-6203 x11, or on my mobile number at (510) 853-1277.

Sincerely,



Craig Ullery
Senior Engineer
Yorke Engineering, LLC
CUllery@YorkeEngr.com

cc: Patrick Gollihar, Taft Production Corporation
Anne McQueen, Yorke Engineering, LLC
Carla J. Prasetyo Jo, Yorke Engineering, LLC
Randy Frazier, Yorke Engineering, LLC

Enclosures:

1. Attachment 1 – FMM Calculations
2. Attachment 2 – Emission Summary Statements

ATTACHMENT 1 – FMM CALCULATIONS

TAFT PRODUCTION COMPANY PERMIT MODIFICATION APPLICATION
FMM Calculations: NOx

Source No. ¹	Device ID No.	Equipment	2013 NOx (tpy) ²	2014 NOx (tpy) ³	Average Annual NOx (lb/yr)	Proposed Production or Fuel Throughput Increase	Percent Increase	Post-Project Average Annual NOx (lb/yr)	FMM ⁵ (lb/yr)	FMM Threshold Exceeded? ⁶
S-1234-2-26	2	NG Dryer	3.45	2.84	6,290	From 720,000 scf/day to 840,000 scf/day	16.7	7340.43		
S-1234-2-26	2	LPG	0	0	0	N/A	0	0		
S-1234-2-26	2	Fabric Collector	0	0	0	From 720,000 scf/day to 840,000 scf/day ⁴	16.7	0		
S-1234-2-26	2	Venturi Scrubber	0	0	0	From 720,000 scf/day to 840,000 scf/day ⁴	16.7	0		
S-1234-13-8	13	Chem/Min- Rec./Storage	0	0	0	From 500 tpd to 600 tpd	20	0		
S-1234-14-12	14	Chem/Min- Dry./Storage	0	0	0	From 640,000 scf/day to 768,000 scf/day ⁴	20	0		
S-1234-14-12	14	NG Burner for dryer	0.15	0.22	370	From 640,000 scf/day to 768,000 scf/day ⁴	20	444		
S-1234-21-6	21	De-Dusting System	0	0	0	From 487.5 tpd to 1500 tpd	207.7	0		
			Baseline Actual Emissions (BAE) =		6,660	Projected Actual Emissions (PAE) =		7,784	1,124	Yes

- Notes:
- 1) Emissions from S-1234-13-8 and S-1234-20-3 are combined and reported as S-1234-13-8.
 - 2) From Emission Statement - Calendar Year 2013 Emissions
 - 3) From Emission Statement - Calendar Year 2014 Emissions
 - 4) It is assumed that increased fuel usage implies increased material throughput with proportionally higher emissions
 - 5) FMM = PAE - BAE
 - 6) FMM threshold for NOx = 0.0 lb/yr, per SJVAPCD Rule 2201, 3.18.1.4, Table 3-1, Significance Thresholds

TAFT PRODUCTION COMPANY PERMIT MODIFICATION APPLICATION
FMM Calculations: VOC

Source No. ¹	Device ID No.	Equipment	2013 VOC (tpy) ²	2014 VOC (tpy) ³	Average Annual VOC (lb/yr)	Proposed Production or Fuel Throughput Increase	Percent Increase	Post-Project Average Annual VOC (lb/yr)	FMM ⁵ (lb/yr)	FMM Threshold Exceeded? ⁶
S-1234-2-26	2	NG Dryer	3.45	2.84	6,290	From 720,000 scf/day to 840,000 scf/day	16.7	7340.43		
S-1234-2-26	2	LPG	0	0	0	N/A	0	0		
S-1234-2-26	2	Fabric Collector	0	0	0	From 720,000 scf/day to 840,000 scf/day ⁴	16.7	0		
S-1234-2-26	2	Venturi Scrubber	0	0	0	From 720,000 scf/day to 840,000 scf/day ⁴	16.7	0		
S-1234-13-8	13	Chem/Min- Rec./Storage	0	0	0	From 500 tpd to 600 tpd	20	0		
S-1234-20-3	14	Chem/Min- Dry./Storage	0	0	0	From 640,000 scf/day to 768,000 scf/day ⁴	20	0		
S-1234-14-12	14	NG Burner for dryer	0.15	0.22	370	From 640,000 scf/day to 768,000 scf/day ⁴	20	444		
S-1234-21-6	21	De-Dusting System	0	0	0	From 487.5 tpd to 1500 tpd	207.7	0		
			Baseline Actual Emissions (BAE) =		6,660	Projected Actual Emissions (PAE) =		7,784	1,124	Yes

Notes:

- 1) Emissions from S-1234-13-8 and S-1234-20-3 are combined and reported as S-1234-13-8.
- 2) From Emission Statement - Calendar Year 2013 Emissions
- 3) From Emission Statement - Calendar Year 2014 Emissions
- 4) It is assumed that increased fuel usage implies increased material throughput with proportionally higher emissions
- 5) FMM = PAE - BAE
- 6) FMM threshold for VOC = 0.0 lb/yr, per SIVAPCD Rule 2201, 3.18.1.4, Table 3-1, Significance Thresholds

Taft Production Company Permit Modification Application

FMM Calculations: PM10

Source No. ¹	Device ID No.	Equipment	2013 PM10 (tpy) ²	2014 PM10 (tpy) ³	Average Annual PM10 (lb/yr)	Proposed Production or Fuel Throughput Increase	Percent Increase	Post-Project Average Annual PM10 (lb/yr)	FMM ⁵ (lb/yr)	FMM Threshold Exceeded? ⁶
S-1234-2-26	2	NG Dryer	0	0	0	From 720,000 scf/day to 840,000 scf/day	16.7	0		
S-1234-2-26	2	LPG	0	0	0	N/A	0	0		
S-1234-2-26	2	Fabric Collector	3.93	1.96	5,890	From 720,000 scf/day to 840,000 scf/day ⁴	16.7	6,874		
S-1234-2-26	2	Venturi Scrubber	7.2	3.6	10,800	From 720,000 scf/day to 840,000 scf/day ⁴	16.7	12,604		
S-1234-13-8	13	Chem/Min-Rec./Storage	1.44	1.29	2,730	From 500 tpd to 600 tpd	20	3,276		
S-1234-14-12	14	Chem/Min-Dry./Storage	0.96	1.21	2,170	From 640,000 scf/day to 768,000 scf/day ⁴	20	2,604		
S-1234-14-12	14	NG Burner for dryer	0	0	0	From 640,000 scf/day to 768,000 scf/day ⁴	20	0		
S-1234-21-6	21	De-Dusting System	0.59	0.58	1,170	From 487.5 tpd to 1500 tpd	207.7	3,600		
			Baseline Actual Emissions (BAE) =		22,760	Projected Actual Emissions (PAE) =		28,957	6,197	No

Notes:

- 1) Emissions from S-1234-13-8 and S-1234-20-3 are combined and reported as S-1234-13-8.
- 2) From Emission Statement - Calendar Year 2013 Emissions
- 3) From Emission Statement - Calendar Year 2014 Emissions
- 4) It is assumed that increased fuel usage implies increased material throughput with proportionally higher emissions
- 5) FMM = PAE - BAE
- 6) FMM threshold for PM10 = 30,000 lb/yr, per SJVAPCD Rule 2201, 3.18.1.4, Table 3-1, Significance Thresholds

$$\begin{array}{r}
 2730 \\
 + 1170 \\
 \hline
 3900 = \text{BAE}
 \end{array}$$

$$\begin{array}{r}
 3276 \\
 + 3600 \\
 \hline
 6876 = \text{PAE}
 \end{array}$$

ATTACHMENT 2 – EMISSION SUMMARY STATEMENTS

Copy 3.20.14

Emission Statement - Calendar Year 2013 Emissions

Facility ID # S - 1234
 TAD # 15 - 1234
 SIC # 3295
 Facility Name TAFT PRODUCTION CO
 TOXID # 50082
 Planning Inventory 3170

Please Sign and Return to:
 San Joaquin Valley Unified APCD
 1990 East Gettysburg Avenue
 Fresno, CA 93726
 or FAX: (559) 230 - 6061

Date / Time Printed 1/31/2014 / 1:24:42 PM

UTM Zone : 11
 UTM East: 280,748
 UTM North: 3888,32

CHECK BOX IF PROCESS RATES ARE CONFIDENTIAL : N

Update Summary

* Please Note: Emissions for NH3 are reported in Lbs / Year.

Device ID #	Process Number	Equipment Type	Yearly Process Rate	Units Source Classification Code	NOX Lb / Unit	VOC Lb / Unit	SOX Lb / Unit	CO Lb / Unit	PM10 Lb / Unit	NH3* Lb / Unit
1	1	Crushing, Screening, Conveying, & Storage	197343	TONS RAW MATERIAL	.0	.0	.0	.0	.01	.0
2	1	Natural Gas Dryer - 35 MMBtu/hr	68.9903	MILLION CUBIC FEET BURNED	100.0	5.3	.6	20.0	.0	.0
2	2	Secondary Fuel-LPG	56.774	1000GALLONS BURNED	12.4	.25	86.5	3.1	.26	.0
2	3	PM10 - Fabric Collector	197343	TONS RAW MATERIAL	.0	.0	.0	.0	.04	.0
2	4	PM10 - Venturi Scrubber	981089	TONS RAW MATERIAL	.0	.0	.0	.0	3.93	.0
3	1	25 MMBtu/hr NG Dryer	197343	TONS RAW MATERIAL	.0	.0	.0	.0	.07	.0
3	2	Material Processed	981089	MILLION CUBIC FEET BURNED	140.0	3.0	.6	17.0	.0	.0
4	1	Bagging & Packaging Operation	64978	TONS PROCESSED	.0	.0	.0	.0	.51	.0
6	1	Material Reclaim System	22347.9	TONS PRODUCT	.0	.0	.0	.0	.03	.0
8	1	Screening, Bagging & Raircar Loadout	159104	TONS RAW MATERIAL	.0	.0	.0	.0	.81	.0
12	1	Truck Loadout	1973.3	TONS RAW MATERIAL	.0	.0	.0	.0	.01	.0
13	1	Chemical/Minerals Receiving & Storage	981089	TONS PRODUCT	.0	.0	.0	.0	.02	.0
14	1	Chemical/Minerals Drying & Storage	0	TONS PRODUCT LOADED	.0	.0	.0	.0	.48	.0
14	2	NG Burner for Dryer - 32 MMBtu/hr	21134	TONS PRODUCT	.0	.0	.0	.0	.0	.0
15	1	Screening, Milling & Storage Operation	189107	TONS PRODUCT	.0	.0	.0	.0	.14	.0
			14812.9	TONS PRODUCT	.0	.0	.0	.0	.13	.0
			181089	TONS PRODUCT	.0	.0	.0	.0	.95	.0
			5.9992	MILLION CUBIC FEET BURNED	49.0	2.8	2.85	280.0	.0	.0
			23403	TONS RAW MATERIAL	.0	.0	.0	.0	.0	.0
			12784	TONS PROCESSED	.0	.0	.0	.0	.01	.0

This data was taken from last year's emissions inventory data. Please make any correction to this document in red ink.

Last Updated By

Emission Statement - Calendar Year 2013 Emissions

Facility ID # S - 1234
 TAD # 15 - 1234
 SIC # 3295
 Facility Name TAFT PRODUCTION CO
 TOXID # 50082
 Planning Inventory 3170

Please Sign and Return to:
 San Joaquin Valley Unified APCD
 1990 East Gettysburg Avenue
 Fresno, CA 93726
 or FAX: (559) 230 - 6061

Date / Time Printed 1/31/2014 / 1:24:42 PM
 UTM Zone : 11
 UTM East: 280.748
 UTM North: 3888.32

CHECK BOX IF PROCESS RATES ARE CONFIDENTIAL : N

Device ID #	Process Number	Equipment Type	Yearly Process Rate	Units Source Classification Code	NOX Lb / Unit	VOC Lb / Unit	SOX Lb / Unit	CO Lb / Unit	PM10 Lb / Unit	NH3* Lb / Unit
16	1	Screening, Milling & Storage Operation	23403 12784	30502021 TONS MATERIAL PROCESSED	.0	.0	.0	.0	.0	.0
17	1	SCREENING/MILLING/STORAGE OPERATION	44000 58108	30502021 TONS MATERIAL PROCESSED	.0	.0	.0	.0	.0	.0
18	1	Chemical/Minerals Processing Operation	8192.4 10001.7	30502008 TONS PROCESSED	.0	.0	.0	.0	.3	.0
19	1	Chemical/Minerals Loadout	1922.5 112.8	30502032 TONS PRODUCT LOADED	.0	.0	.0	.0	.0	.0
21	1	De-dusting System	71822.3 71233	30502001 TONS RAW MATERIAL	.0	.0	.0	.0	.02	.0
22	1	0.4 MMBtu/Hr Natural Gas Dryer	0.0176 4.8	30590003 MILLION CUBIC FEET BURNED	100.0	5.3	.6	21.0	12.0	.0
Totals For the Facility (TONS / YEAR)					3.6	.19	.03	1.53	17.35	.0

* Please Note: Emissions for NH3 are reported in Lbs / Year.

Update Summary

Contact	Patrick Gollihar
Company	TAFT PRODUCTION COMPANY
Address	PO BOX 1277
City, State, Zip	TAFT CA 93268-1277
Telephone	(661) 765 - 7194
Email	Patrick.Gollihar@oidri.com
Location of facility if different from above	TAFT PRODUCTION CO 950 N PETROLEUM CLUB ROAD TAFT, CA
Name and Title of Responsible Official	Patrick Gollihar, Proj Mgr
	Gerry Salinas, Pit Mgr, Nancy Tidwell, H
I certify that the information contained in the Emission Statement is accurate to the best of my knowledge.	
Signature of Responsible Official and Date	

This data was taken from last year's emissions inventory data. Please make any correction to this document in red ink.

Last Updated By

Copy - 11/11/15
3.28.15

Emission Statement - Calendar Year 2014 Emissions

Facility ID # S - 1234
 TAD # 15 - 1234
 SIC # 3295
 Facility Name TAFT PRODUCTION CO
 TOXID # 50082
 Planning Inventory 3170

Please Sign and Return to:
 San Joaquin Valley APCD
 1990 E. Gettysburg Ave.
 Fresno, CA 93726
 or FAX: (559) 230 - 6061

Date / Time Printed 1/22/2015 / 6:26:12 AM

UTM Zone: 11
 UTM East: 280.748
 UTM North: 3888.32

CHECK BOX IF PROCESS RATES ARE CONFIDENTIAL: N

Update Summary

Device ID #	Process Number	Equipment Type	Yearly Process Rate	Units	NOX Lb / Unit	VOC Lb / Unit	SOX Lb / Unit	CO Lb / Unit	PM10 Lb / Unit	NH3* Lb / Unit
1	1	CRUSHING, SCREENING, CONVEYING, & STORAGE	98689 115223.0	TONS RAW MATERIAL 30502001	.0	.0	.0	.0	.01	.0
2	1	NATURAL GAS DRYER - 35 MMBTU/HR	56.774 54104.3	MILLION CUBIC FEET BURNED 30590003	100.0	5.3	.6	20.0	.0	.0
2	2	SECONDARY FUEL-LPG	0	1000GALLONS BURNED	2184	15	102	57	.0	.0
2	3	PM10 - FABRIC COLLECTOR	98689 115223.0	TONS RAW MATERIAL 10201002	12.4	.25	86.5	3.1	.26	.0
2	4	PM10 - VENTURI SCRUBBER	98689 115223.0	TONS RAW MATERIAL 30502001	.0	.0	.0	.0	.04	.0
3	1	25 MMBTU/HR NG DRYER	0	MILLION CUBIC FEET BURNED 30590003	140.0	3.0	.6	17.0	.0	.0
3	2	MATERIAL PROCESSED	0	TONS PROCESSED	.0	.0	.0	.0	.51	.0
4	1	BAGGING & PACKAGING OPERATION	59613 14210.4	TONS PRODUCT 30599999	.0	.0	.0	.0	.03	.0
6	1	MATERIAL RECLAIM SYSTEM	15964 10550.0	TONS RAW MATERIAL 30502006	.0	.0	.0	.0	.0	.0
8	1	SCREENING, BAGGING & RAIRCAR LOADOUT	9868 11322.3	TONS PRODUCT 30599999	.0	.0	.0	.0	.02	.0
12	1	TRUCK LOADOUT	0	TONS PRODUCT LOADED	.0	.0	.0	.0	.48	.0
13	1	CHEMICAL/MINERALS RECEIVING & STORAGE	18967 11107	TONS PRODUCT 30502032	.0	.0	.0	.0	.14	.0
14	1	CHEMICAL/MINERALS DRYING & STORAGE	18652	TONS PRODUCT 30502502	.0	.0	.0	.0	.13	.0
14	2	NG BURNER FOR DRYER - 32 MMBTU/HR	8.944	MILLION CUBIC FEET BURNED 30502505	49.0	2.8	2.85	280.0	.0	.0
15	1	SCREENING, MILLING & STORAGE OPERATION	12784 9464	TONS PROCESSED 30590003	22	101	101	125	.0	.0
				TONS PROCESSED 30502005	.0	.0	.0	.0	.01	.0

* Please Note: Emissions for NH3 are reported in Lbs / Year.

Note: This data was taken from last year's emissions inventory data. Please update with this year's data.

Emission Statement - Calendar Year 2014 Emissions

Date / Time Printed 1/22/2015 / 6:26:12 AM

UTM Zone: 11
 UTM East: 280.748
 UTM North: 3888.32

Please Sign and Return to:
 San Joaquin Valley APCD
 1990 E. Gettysburg Ave.
 Fresno, CA 93726
 or FAX: (559) 230 - 6051

Facility ID # S - 1234
 TAD # 15 - 1234
 SIC # 3295
 Facility Name TAFT PRODUCTION CO
 TOXID # 50082
 Planning Inventory 3170

CHECK BOX IF PROCESS RATES ARE CONFIDENTIAL : **N**

Device ID #	Process Number	Equipment Type	Yearly Process Rate	Units Source Classification Code	NOX Lb / Unit	VOC Lb / Unit	SOX Lb / Unit	CO Lb / Unit	PM10 Lb / Unit	NH3* Lb / Unit
16	1	SCREENING, MILLING & STORAGE OPERATION	12794 944.4	30502021 TONS MATERIAL PROCESSED	.0	.0	.0	.0	.0	.0
17	1	SCREENING/MILLING/STORAGE OPERATION	5868 4934.4	30502021 TONS MATERIAL PROCESSED	.0	.0	.0	.0	.0	.0
18	1	CHEMICAL/MINERALS PROCESSING OPERATION	10501.7 8882.8	30502021 TONS PROCESSED	.0	.0	.0	.0	.3	.0
19	1	CHEMICAL/MINERALS LOADOUT	1112.8 844.0	30502008 TONS PRODUCT LOADED	.0	.0	.0	.0	1.58	.0
21	1	DE-DUSTING SYSTEM	71533	30502032 TONS RAW MATERIAL	.0	.0	.0	.0	.0	.0
22	1	0.4 MMBTU/HR NATURAL GAS DRYER	7077.0 0.0048 23	30502001 MILLION CUBIC FEET BURNED	100.0	5.3	.6	21.0	.58	.0
Totals For the Facility (Tons / Year)					3.06	.16	.03	1.82	11.63	.0

* Please Note: Emissions for NH3 are reported in Lbs / Year.

Update Summary

Contact Company Address City, State, Zip Telephone Email Location of facility if different from above	Patrick Gollihar TAFT PRODUCTION COMPANY PO BOX 1277 TAFT, CA 93268-1277 (661) 765 - 7194 Patrick.Gollihar@oldri.com TAFT PRODUCTION CO 950 N PETROLEUM CLUB ROAD TAFT, CA
Name and Title of Responsible Official	Patrick Gollibar, Proj Mgr Gerry Salinas, Plt Mgr, Nancy Tidwell, H
I certify that the information contained in the Emission Statement is accurate to the best of my knowledge.	
_____ Signature of Responsible Official and Date	

Note: This data was taken from last year's emissions inventory data. Please update with this year's data.

APPENDIX D
BACT Guideline and BACT Analysis

Best Available Control Technology (BACT) Guideline 8.4.3
Last Update: 4/2/2012

Dry Material Handling Operation - Mixing, Blending, Milling, or Storage

Pollutant	Achieved in Practice or in the SIP	Technologically Feasible	Alternate Basic Equipment
PM10	Mixer, augers, elevators, conveyors all enclosed and vented to a fabric filter baghouse, or equivalent (99% or greater control efficiency)		

BACT Analyses for PM10 Emissions:

S-1234-13-9, '20-4 and '21-7

PM10

a. Step 1 - Identify all control technologies

The SJVUAPCD BACT Clearinghouse Guideline 8.4.3 (current version), identifies Achieved in Practice BACT for PM10 from chemicals/minerals receiving & storage operation as:

- Mixer, augers, elevators, conveyors all enclosed and vented to a fabric filter baghouse, or equivalent (99% or greater control efficiency)

b. Step 2 - Eliminate technologically infeasible options

The listed control is feasible.

c. Step 3 - Rank remaining options by control effectiveness

- Mixer, augers, elevators, conveyors all enclosed and vented to a fabric filter baghouse, or equivalent (99% or greater control efficiency)

d. Step 4 - Cost effectiveness analysis

The equipment is currently served by the above control; therefore, a cost effectiveness analysis is not required.

e. Step 5 - Select BACT

- Mixer, augers, elevators, conveyors all enclosed and vented to a fabric filter baghouse, or equivalent (99% or greater control efficiency)

APPENDIX E
HRA

San Joaquin Valley Air Pollution Control District

Risk Management Review

To: David Torii – Permit Services
 From: Cheryl Lawler – Technical Services
 Date: June 24, 2015
 Facility Name: Taft Production Company
 Location: 950 Petroleum Club Road, Taft
 Application #(s): S-1234-13-9, 20-4, 21-7
 Project #: S-1144430

A. RMR SUMMARY

RMR Summary			
Categories	Cat Box Litter Receiving, Storage, & Handling (Units 13-9, 20-4, 21-7)	Project Totals	Facility Totals
Prioritization Score	0.00*	0.00*	<1
Acute Hazard Index	N/A	N/A	N/A
Chronic Hazard Index	N/A	N/A	N/A
Maximum Individual Cancer Risk	N/A	N/A	N/A
T-BACT Required?	No		
Special Permit Conditions?	No		

*A prioritization was not performed after determining no Hazardous Air Pollutants (HAPs) are associated with this project. No further analysis was required.

I. Project Description

Technical Services received a request on June 19, 2015, to perform a Risk Management Review for an increase in the receiving, storage, and handling at a cat box litter operation.

II. Analysis

Technical Services reviewed all submitted MSDSs (from Project #1010876) for Hazardous Air Pollutants (HAPs). The submitted MSDSs listed sodium bentonite and opaline mineral among the constituents present. Technical Services further reviewed several generic MSDSs of bentonite clay and opaline mineral for HAPs. Bentonite clay is composed of the following constituents: SiO₂, Al₂O₃, Fe₂O₃, Na₂O, MgO, CaCO₃, and water. None of these compounds are listed as HAPs. Opaline mineral is composed of SiO₂•H₂O, which is also not a HAP.

No HAPs were found in any of the MSDSs reviewed. Therefore, **the effective prioritization score for this project is 0.0.**

iii. Conclusions

The proposed project will not contribute to the facility's risk. In accordance with the District's Risk Management Policy, the project is approved **without** Toxic Best Available Control Technology (T-BACT).

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

APPENDIX F
Draft ATCs

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-1234-13-9

LEGAL OWNER OR OPERATOR: TAFT PRODUCTION COMPANY
MAILING ADDRESS: PO BOX 1277
950 N PETROLEUM CLUB ROAD
TAFT, CA 93268-1277

LOCATION: 950 N PETROLEUM CLUB ROAD
TAFT, CA

SECTION: 28 **TOWNSHIP:** 32S **RANGE:** 24E

EQUIPMENT DESCRIPTION:

MODIFICATION OF AGRICULTURAL CHEMICALS/MINERALS RECEIVING & STORAGE OPERATION: INCREASE DAILY MATERIAL THROUGHPUT LIMIT, DAILY OPERATING HOUR LIMIT, AND ADD AN ANNUAL EMISSION LIMIT SHARED BETWEEN S-1234-13, '20 AND '21

CONDITIONS

1. Operation shall include 20,550 cubic foot capacity raw ore storage silo #102 with Rees 29S wheel fan. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Operation shall include the following equipment shared with PTO #S-1234-20: hopper #101, belt conveyor #101, elevator #101, belt conveyor #102, belt conveyor #103, and #101 fabric collector, model 100S-2-20 with 7.5 hp motor. [District Rule 2201] Federally Enforceable Through Title V Permit
3. No more than 600 tons of material shall be received on any day. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Minimum exhaust duct velocity shall be maintained at 3,840 fpm. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Fabric collector #101 shall be operated whenever storage silos are in operation. [District Rule 2201] Federally Enforceable Through Title V Permit
6. There shall be no detectable emissions except at truck receiving hopper and fabric collector #101. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 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

Arnaud Marjolle, Director of Permit Services

S-1234-13-9 Jul 7 2015 6:30AM - TORID Joint Inspection NOT Required

7. Particulate matter emissions from belt conveyors and silo vent exhaust shall not exceed 0.058 grams/dscm. [District Rule 2201 and District Rule 4201, 3.0] Federally Enforceable Through Title V Permit
8. Operation of all equipment included with this permit unit shall not exceed 24 hours on any day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Fugitive particulate matter emissions from truck receiving hopper shall not exceed 2.50 lbm per hour. [District Rule 2201 and District Rule 4202, 4.0] Federally Enforceable Through Title V Permit
10. Particulate matter emissions from fabric collector #101 shall not exceed 0.34 lbm per hour. [District Rule 2201 and District Rule 4202, 4.0] Federally Enforceable Through Title V Permit
11. PM10 emissions from S-1234-13, 20 and '21 shall not exceed 23,632 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Accurate daily records of the amount & type of material received and the daily hours of operation shall be maintained, retained for a period of at least five years, and made available for District inspection upon request. [District Rule 2201 and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
13. If fabric collector exhibits visible emissions, then PM10 emissions from fabric collectors shall be tested to demonstrate compliance with emissions limits. Sample collection shall be District-witnessed and testing shall be by an independent laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
14. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified at least 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
15. The results of each source test, including field data and official test results, shall be submitted to the District within 60 days after collection. [District Rule 1081] Federally Enforceable Through Title V Permit
16. Owner or operator shall not cause to be discharged into the atmosphere from any transfer point on belt conveyors or from any other affected facility any stack emissions which: (1) Contain particulate matter in excess of 0.05 g/dscm (0.022 gr/dscf); or (2) Exhibit greater than 7 percent opacity. [District Rule 4201, 3.0 and 40 CFR 60.672(a)] Federally Enforceable Through Title V Permit
17. Except from truck dumping, owner or operator shall not cause to be discharged into the atmosphere from any transfer point on belt conveyors or from any other affected facility any fugitive emissions which exhibit greater than 10 percent opacity. [40 CFR 60.672(b)] Federally Enforceable Through Title V Permit
18. Visible emissions from dust collector #101 shall not exceed 7% opacity. [40 CFR 60.672(f)] Federally Enforceable Through Title V Permit
19. Testing to demonstrate compliance with the opacity standards in 40 CFR 60.672(a) shall be performed at least annually using EPA Method 9 and the procedures in 40 CFR 60.11. [40 CFR 60.675(b)] Federally Enforceable Through Title V Permit
20. Testing to demonstrate compliance with the particulate matter standards in 40 CFR 60.672(b) shall be performed at least annually using EPA Method 9 and the procedures in ¹ 60.11, with the following additions: (i) The minimum distance between the observer and the emission source shall be 4.57 meters (15 feet); (ii) The observer shall, when possible, select a position that minimizes interference from other fugitive emission sources (e.g., road dust). The required observer position relative to the sun (Method 9, Section 2.1) must be followed. [40 CFR 60.675(c)(1)] Federally Enforceable Through Title V Permit
21. Testing to demonstrate compliance with the opacity of stack emissions standards from any baghouse subject to 40 CFR 60.672(f) shall be performed at least annually using EPA Method 9. The duration of the Method 9 observations shall be 1 hour (ten 6-minute averages). [40 CFR 60.675(c)(2)] Federally Enforceable Through Title V Permit
22. When determining compliance with the fugitive emissions opacity standard of 40 CFR 60.672(b), the duration of the Method 9 observations must be 30 minutes (five 6-minute averages). [40 CFR 60.675(c)(3)] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

23. Owner or operator of any affected facility shall submit written reports of the results of all performance tests conducted to demonstrate compliance, including reports of opacity observations made using Method 9 and reports of observations using Method 22. [40 CFR 60.676(f)] Federally Enforceable Through Title V Permit
24. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E = 3.59 \times P^{0.62}$ if P is less than or equal to 30 tons per hour, or $E = 17.31 \times P^{0.16}$ if P is greater than 30 tons per hour. [District Rule 4202, 4.0] Federally Enforceable Through Title V Permit
25. Visible emissions from each dust collector shall be evaluated using EPA method 22 for a period of at least 6 minutes at least once during each day the dust collector is operated. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. Corrective action shall include the following: inspecting the dust collector system for for any tears, abrasions, or holes in the filters; inspecting closed duct systems for damage; and repairing or replacing any defective or damaged material. [District Rules 2520, 9.3.2 and 40 CFR 64] Federally Enforceable Through Title V Permit
26. Dust collection system shall be inspected at least quarterly when the unit is not in operation for any tears, abrasions, or holes in the filters; damage to closed duct systems; or any evidence of particulate matter leaks which might interfere with the PM collection efficiency. Any defective or damaged material shall be repaired or replaced as needed. [District Rule 2520, 9.3.2 and 40 CFR 64] Federally Enforceable Through Title V Permit
27. Records of dust collection system maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2 and 40 CFR 64] Federally Enforceable Through Title V Permit
28. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR 64.7. [40 CFR 64] Federally Enforceable Through Title V Permit
29. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR 64.9. [40 CFR 64] Federally Enforceable Through Title V Permit
30. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR 64.8. [40 CFR 64] Federally Enforceable Through Title V Permit
31. {2426} The permittee shall maintain, and make available for District inspection, all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
32. Compliance with permit conditions in the Title V permit shall be deemed compliance with the applicable requirements of District Rule 4202 (as amended 12/17/92). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
33. Compliance with permit conditions in the Title V permit shall be deemed compliance with the applicable requirements of 40 CFR 60 Subpart OOO. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT

PERMIT NO: S-1234-20-4

LEGAL OWNER OR OPERATOR: TAFT PRODUCTION COMPANY
MAILING ADDRESS: PO BOX 1277
950 N PETROLEUM CLUB ROAD
TAFT, CA 93268-1277

LOCATION: 950 N PETROLEUM CLUB ROAD
TAFT, CA

SECTION: 28 **TOWNSHIP:** 32S **RANGE:** 24E

EQUIPMENT DESCRIPTION:

MODIFICATION OF AGRICULTURAL CHEMICALS/MINERALS RECEIVING & STORAGE OPERATION: INCREASE DAILY MATERIAL THROUGHPUT LIMIT, DAILY OPERATING HOUR LIMIT, AND ADD AN ANNUAL EMISSION LIMIT SHARED BETWEEN S-1234-13, '20 AND '21

CONDITIONS

1. Operation shall include the following equipment shared with PTO #S-1234-0013: hopper #101, belt conveyors #'s 101-103, 24 in. x 58 in. x 88 ft. elevator #101, and model #1005-2-20 fabric collector #101. [District Rule 2010] Federally Enforceable Through Title V Permit
2. Operation shall include 20,550 cubic ft. raw ore storage silo #101. [District Rule 2010] Federally Enforceable Through Title V Permit
3. No more than 600 tons of material shall be received per day. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Minimum exhaust duct velocity shall be maintained at 3839 fpm. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Fabric collector #101 shall operate whenever process equipment is in operation. [District Rule 2201] Federally Enforceable Through Title V Permit
6. There shall be no detectable emissions except at truck receiving hopper and fabric collector #101. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 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

Arnaud Marjollet, Director of Permit Services
S-1234-20-4 Jul 7 2015 6:30AM - TORID - Joint Inspection NOT Required

7. Operation of this equipment shall not exceed 24 hours per day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. PM10 emissions from S-1234-13, 20 and '21 shall not exceed 23,632 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Particulate matter emissions from this permit unit are included with emissions for fabric collector #101 shared with unit #S-1234-13. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Accurate daily records of the amount & type of material received and the daily hours of operation shall be maintained, retained for a period of at least five years, and made available for District inspection upon request. [District Rule 2201 and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
11. Owner or operator shall not cause to be discharged into the atmosphere from any transfer point on belt conveyors or from any other affected facility any stack emissions which: (1) Contain particulate matter in excess of 0.05 g/dscm (0.022 gr/dscf); or (2) Exhibit greater than 7 percent opacity. [District Rule 4201, 3.0 and 40 CFR 60.672(a)] Federally Enforceable Through Title V Permit
12. Except from truck dumping, owner or operator shall not cause to be discharged into the atmosphere from any transfer point on belt conveyors or from any other affected facility any fugitive emissions which exhibit greater than 10 percent opacity. [40 CFR 60.672(b)] Federally Enforceable Through Title V Permit
13. Visible emissions from fabric collector #101 shall not exceed 7% opacity. [40 CFR 60.672(f)] Federally Enforceable Through Title V Permit
14. Testing to demonstrate compliance with the opacity standards in 40 CFR 60.672(a) shall be performed at least annually using EPA Method 9 and the procedures in 40 CFR 60.11. [40 CFR 60.675(b)] Federally Enforceable Through Title V Permit
15. Testing to demonstrate compliance with the particulate matter standards in 40 CFR 60.672(b) shall be performed at least annually using EPA Method 9 and the procedures in ⁺ 60.11, with the following additions: (i) The minimum distance between the observer and the emission source shall be 4.57 meters (15 feet); (ii) The observer shall, when possible, select a position that minimizes interference from other fugitive emission sources (e.g., road dust). The required observer position relative to the sun (Method 9, Section 2.1) must be followed. [40 CFR 60.675(c)(1)] Federally Enforceable Through Title V Permit
16. Testing to demonstrate compliance with the opacity of stack emissions standards from any baghouse subject to 40 CFR 60.672(f) shall be performed at least annually using EPA Method 9. The duration of the Method 9 observations shall be 1 hour (ten 6-minute averages). [40 CFR 60.675(c)(2)] Federally Enforceable Through Title V Permit
17. When determining compliance with the fugitive emissions opacity standard of 40 CFR 60.672(b), the duration of the Method 9 observations must be 30 minutes (five 6-minute averages). [40 CFR 60.675(c)(3)] Federally Enforceable Through Title V Permit
18. Owner or operator of any affected facility shall submit written reports of the results of all performance tests conducted to demonstrate compliance, including reports of opacity observations made using Method 9 and reports of observations using Method 22. [40 CFR 60.676(f)] Federally Enforceable Through Title V Permit
19. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E = 3.59 \times P^{0.62}$ if P is less than or equal to 30 tons per hour, or $E = 17.31 \times P^{0.16}$ if P is greater than 30 tons per hour. [District Rule 4202, 4.0] Federally Enforceable Through Title V Permit
20. Visible emissions from each dust collector shall be evaluated using EPA method 22 for a period of at least 6 minutes at least once during each day the dust collector is operated. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. Corrective action shall include the following: inspecting the dust collector system for any tears, abrasions, or holes in the filters; inspecting closed duct systems for damage; and repairing or replacing any defective or damaged material. [District Rules 2520, 9.3.2 and 40 CFR 64] Federally Enforceable Through Title V Permit

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CONDITIONS CONTINUE ON NEXT PAGE

21. Dust collection system shall be inspected at least quarterly when the unit is not in operation for any tears, abrasions, or holes in the filters; damage to closed duct systems; or any evidence of particulate matter leaks which might interfere with the PM collection efficiency. Any defective or damaged material shall be repaired or replaced as needed. [District Rule 2520, 9.3.2 and 40 CFR 64] Federally Enforceable Through Title V Permit
22. Records of dust collection system maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2 and 40 CFR 64] Federally Enforceable Through Title V Permit
23. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR 64.7. [40 CFR 64] Federally Enforceable Through Title V Permit
24. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR 64.9. [40 CFR 64] Federally Enforceable Through Title V Permit
25. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR 64.8. [40 CFR 64] Federally Enforceable Through Title V Permit
26. {2426} The permittee shall maintain, and make available for District inspection, all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
27. Compliance with permit conditions in the Title V permit shall be deemed compliance with the applicable requirements of District Rule 4202 (as amended 12/17/92). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
28. Compliance with permit conditions in the Title V permit shall be deemed compliance with the applicable requirements of 40 CFR 60 Subpart OOO. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: S-1234-21-7

LEGAL OWNER OR OPERATOR: TAFT PRODUCTION COMPANY
MAILING ADDRESS: PO BOX 1277
950 N PETROLEUM CLUB ROAD
TAFT, CA 93268-1277

LOCATION: 950 N PETROLEUM CLUB ROAD
TAFT, CA

SECTION: 28 TOWNSHIP: 32S RANGE: 24E

EQUIPMENT DESCRIPTION:

MODIFICATION OF PRODUCT DE-DUSTING SYSTEM INCLUDING DEDUSTERS, ADDITIVE BIN, BUCKET ELEVATORS, CONVEYORS AND A DUST COLLECTOR: INCREASE DAILY MATERIAL THROUGHPUT LIMIT AND ADD AN ANNUAL EMISSION LIMIT SHARED BETWEEN S-1234-13, '20 AND '21

CONDITIONS

1. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is dark or darker than Ringelmann 1/2 or equivalent to 10% opacity. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Additive shall be received in bags and hand dumped into 64 cu.ft. bin with visible emissions less than 10% opacity. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Operation shall include: two 20 hp deduster units #D1 and D2, one 5 hp bucket elevator #E18, and two 3 hp conveyors #C20 and C21. [District Rule 2010] Federally Enforceable Through Title V Permit
4. Operation shall include: one additive bin with one 2 hp bucket elevator #E19, and one Ultra Industries, model ND-300, dust collector #DC5 equipped with 50 hp blower. [District Rule 2010] Federally Enforceable Through Title V Permit
5. All material transfer points approved shall be enclosed. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Deduster units #D1 and D2 shall be enclosed and vented exclusively to dust collector #DC5. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

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Seyed Sadredin, Executive Director, APCO

Arnaud Marjollet, Director of Permit Services

S-1234-21-7 Jul 7 2015 6:30AM - TORID - Joint Inspection NOT Required

7. Total weight of all materials introduced into this permit unit shall not exceed 1,500 tons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. PM10 emission rate for permit unit shall not exceed 0.0163 lb-PM10 per ton of material processed. [District Rule 2201 and District Rule 4202, 4.0] Federally Enforceable Through Title V Permit
9. PM10 emissions from S-1234-13, 20 and '21 shall not exceed 23,632 lb/year. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Dust collector #DC5 shall be maintained with a minimum filter area of 4,590 sq. ft. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Material removed from dust collector #DC5 shall be handled in a manner preventing entrainment into the atmosphere (less than 10% opacity). [District Rule 2201] Federally Enforceable Through Title V Permit
12. Permittee shall keep accurate records of material processed on a daily basis, and shall make such records readily available for District inspection for a period of at least five years. [District Rule 2201 and District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
13. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E = 3.59 \times P^{0.62}$ if P is less than or equal to 30 tons per hour, or $E = 17.31 \times P^{0.16}$ if P is greater than 30 tons per hour. [District Rule 4202, 4.0] Federally Enforceable Through Title V Permit
14. Visible emissions from each dust collector shall be evaluated using EPA method 22 for a period of at least 6 minutes at least once during each day the dust collector is operated. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. Corrective action shall include the following: inspecting the dust collector system for any tears, abrasions, or holes in the filters; inspecting closed duct systems for damage; and repairing or replacing any defective or damaged material. [District Rules 2520, 9.3.2; 4201, 3.0; and 40 CFR 64] Federally Enforceable Through Title V Permit
15. Dust collection system shall be inspected at least quarterly when the unit is not in operation for any tears, abrasions, or holes in the filters; damage to closed duct systems; or any evidence of particulate matter leaks which might interfere with the PM collection efficiency. Any defective or damaged material shall be repaired or replaced as needed. [District Rule 2520, 9.3.2 and 40 CFR 64] Federally Enforceable Through Title V Permit
16. Records of dust collection system maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520, 9.4.2 and 40 CFR 64] Federally Enforceable Through Title V Permit
17. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR 64.7. [40 CFR 64] Federally Enforceable Through Title V Permit
18. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR 64.9. [40 CFR 64] Federally Enforceable Through Title V Permit
19. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR 64.8. [40 CFR 64] Federally Enforceable Through Title V Permit
20. {2426} The permittee shall maintain, and make available for District inspection, all records of required monitoring data and support information for inspection at any time for a period of five years. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
21. Compliance with permit conditions in the Title V permit shall be deemed compliance with the applicable requirements of District Rule 4202 (as amended 12/17/92). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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