



OCT 14 2013

Ms. Julia Bonardi
Gallo Glass Company
600 Yosemite Boulevard
Modesto, CA 95353

**Re: Proposed Authority to Construct/Certificate of Conformity (Minor Mod)
District Facility # N-1662
Project # N-1132601**

Dear Ms. Bonardi:

Enclosed for your review is the District's analysis of an application for Authority to Construct for the facility identified above. You requested that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. The modification is to add a waste overflow system to serve the electrostatic precipitator and the ceramic filter dust collector.

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

If you have any questions, please contact Mr. Rupi Gill, Permit Services Manager, at (209) 557-6400.

Thank you for your cooperation in this matter.

Sincerely,

David Warner
Director of Permit Services

Enclosures

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

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)
1990 E. Gettysburg Avenue
Fresno, CA 93726-0244
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

Authority to Construct Application Review

Facility Name: Gallo Glass Company
Mailing Address: 600 Yosemite Boulevard
Modesto, CA 95354

Date: September 24, 2013

Contact Person: Julia Bonardi
Telephone: (209) 341-4298

Engineer: Mark Schonhoff

Application #: N-1662-16-0

Project #: N-1132601
Deemed Complete: August 28, 2013

I. Proposal

Gallo Glass Company is proposing to receive an Authority-to-Construct Permit (ATC) to install an overflow system to receive and store material captured by the electrostatic precipitator and the ceramic filter type dust collector that serve the glass melting furnaces. The overflow material receiving and storage equipment will be served by a fabric filter type dust collector.

II. Applicable Rules

2201 New and Modified Stationary Source Review Rule (4/21/11)
2410 Prevention of Significant Deterioration (11/26/12)
2520 Federally Mandated Operating Permits (6/21/01)
4101 Visible Emissions (2/17/05)
4102 Nuisance (12/17/92)
4201 Particulate Matter Concentration (12/17/92)
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
CH&SC 41700
CH&SC 42301.6

III. Project Location

605 S. Santa Cruz Avenue
Modesto, CA

The equipment will not be located within 1,000 feet of a K-12 school.

IV. Process Description

The glass melting furnaces are served by an electrostatic precipitator (ESP) and a ceramic filter type dust collector that control the particulate matter generated. Once captured, the particulate matter is stored in bins integral to those devices. Once the bins become full, their contents are transported to a storage silo in Batch Plant 5 and from the Batch Plant 5 silo, the material is recycled into the furnaces.

At times, the Batch Plant 5 silo reaches capacity and it becomes necessary to recycle the captured material into the furnaces at that time. This can result in recycle material being placed into the furnaces at times and in amounts that are not desirable.

To avoid this, the facility operator is proposing to receive an ATC authorizing the installation of an overflow system that would accept the material in the event that the Batch Plant 5 silo is full.

In the overflow system, the material will be pneumatically conveyed to an enclosed receiving bin and then it will be dropped into an approximately 20 cubic yard bin. If the bin is full or unavailable for some other reason, the material will be placed into bulk bags. Once full, the bins and/or bulk bags and their contents will be transported to a landfill for disposal. The particulate matter generated will be controlled utilizing a fabric filter type dust collector.

V. Equipment Listing

WASTE OVERFLOW SYSTEM SERVING THE ELECTROSTATIC PRECIPITATOR AND THE CERAMIC FILTER DUST COLLECTOR. THE SYSTEM CONSISTS OF AN ENCLOSED PORTABLE STORAGE BIN OR BULK BAGS, A PNEUMATIC DELIVERY SYSTEM AND A DYNAMIC AIR 36A-9 SERIES 250 MODULE KLEEN DUST COLLECTOR.

VI. Emission Control Technology Evaluation

The proposed equipment will be served by a baghouse that will provide control of the PM10 generated.

Baghouse Filtering Velocity:

Flow: 225 acfm
Cloth Area: 40 ft²

Filtering Velocity = $225 \text{ acfm} \div 40 \text{ ft}^2 = 5.6 \text{ fpm}$

The recommended maximum filtering velocity for talc (similar type of waste material) in a baghouse, served by a pulse jet/reverse air/felt cleaning system, is 10 fpm (Reference from Air Pollution Engineering Manual, Air & Waste Management Association –1992 Table 5, page 128). The proposed baghouse will operate at less than the maximum recommended filtering velocity and is therefore expected to function properly.

VII. General Calculations

A. Assumptions

Assumptions will be stated as they are made.

B. Emission Factors

An emission factor for the material to be transferred is not available. However, per the applicant, the material will be similar to talc. Therefore, the following emission factor for the final packaging of talc with a baghouse (AP-42, Table 11.26-1) will be used.

$$EF_{PM10} = 0.0035 \text{ lb}/10^3 \text{ lb}$$

C. Potential to Emit (PE)

1. Potential to Emit

Premodification:

The equipment is new, therefore, the premodification potential to emit is zero.

Postmodification:

EF_{PM10} : 0.0035 lb/10³ lb (0.007 lb/ton)
Throughput: 4,000 lb/day (applicant)

$$PE_{PM10} = (0.0035 \text{ lb}/10^3 \text{ lb})(4,000 \text{ lb}/\text{day}) = 0.0 \text{ lb}/\text{day}$$

$$PE_{PM10} = (0.0035 \text{ lb}/10^3 \text{ lb})(4,000 \text{ lb}/\text{day})(365 \text{ days}/\text{yr}) = 5 \text{ lb}/\text{yr}$$

The daily emissions were calculated to be 0.014 lb/day and were set to zero per District policy APR-1105.

D. Increase in Permitted Emissions (IPE)

1. Quarterly IPE

$$\text{PM}_{10} = 5 \text{ lb/yr} - 0 \text{ lb/yr} = 5 \text{ lb/yr} \text{ (1.25 lb/qtr)}$$

The emission profile for this ATC will include the following:

	NOx (lb)	SOx (lb)	PM10 (lb)	CO (lb)	VOC (lb)
Annual PE	0	0	5	0	0
Daily PE	0	0	0	0	0
Δ PE (Qtr 1)	0	0	1	0	0
Δ PE (Qtr 2)	0	0	1	0	0
Δ PE (Qtr 3)	0	0	1	0	0
Δ PE (Qtr 4)	0	0	2	0	0

2. Adjusted Increase in Permitted Emissions (AIPE)

AIPE is used to determine whether or not Best Available Control Technology (BACT) is required for modified units. The equipment currently under consideration is new, therefore, AIPE calculations are not necessary.

E. Facility Emissions

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

The SSPE1 contributions are from the Application Review document for project N-1122842.

Permit #	SSPE1 (lb/yr)				
	NOx	CO	VOC	SOx	PM10
N-1662-1-15	265,771	7,593	43,662	187,938	86,238
N-1662-2-16	179,923	115,665	29,559	127,231	58,382
N-1662-3-16	179,923	1,285	29,559	127,231	58,382
N-1662-4-17	302,684	46,567	53,552	230,505	105,770
N-1662-5-3	0	0	0	0	1,840
N-1662-6-6	0	0	0	0	27,156
N-1662-7-3	0	0	0	0	114
N-1662-8-7	1,199	1,890	78	1,552	11,570
N-1662-10-3	5,994	1,297	488	2	171
N-1662-11-3	5,994	1,297	488	2	171
N-1662-12-3	5,994	1,297	488	2	171
N-1662-14-4	0	0	0	0	112,524
N-1662-15-3	324	1,350	27	26	108
Total w/o ERC's	947,806	178,241	157,901	674,489	462,597
ERC N-3-2	379,472	---	---	---	---
ERC N-54-2	85,737	---	---	---	---
ERC N-56-2	305,681	---	---	---	---
ERC N-107-2	326,978	---	---	---	---
ERC N-3-3	---	3,417	---	---	---
ERC N-56-3	---	2,044	---	---	---
ERC N-161-4	---	---	---	---	92,898
SSPE2	2,045,674	183,702	157,901	674,489	555,495

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

SSPE2 (lb/yr)					
Permit #	NOx	CO	VOC	SOx	PM10
N-1662-1-15	265,771	7,593	43,662	187,938	86,238
N-1662-2-16	179,923	115,665	29,559	127,231	58,382
N-1662-3-16	179,923	1,285	29,559	127,231	58,382
N-1662-4-17	302,684	46,567	53,552	230,505	105,770
N-1662-5-3	0	0	0	0	1,840
N-1662-6-6	0	0	0	0	27,156
N-1662-7-3	0	0	0	0	114
N-1662-8-7	1,199	1,890	78	1,552	11,570
N-1662-10-3	5,994	1,297	488	2	171
N-1662-11-3	5,994	1,297	488	2	171
N-1662-12-3	5,994	1,297	488	2	171
N-1662-14-4	0	0	0	0	112,524
N-1662-15-3	324	1,350	27	26	108
N-1662-16-0	0	0	0	0	5
Total w/o ERC's	947,806	178,241	157,901	674,489	462,602
ERC N-3-2	379,472	---	---	---	---
ERC N-54-2	85,737	---	---	---	---
ERC N-56-2	305,681	---	---	---	---
ERC N-107-2	326,978	---	---	---	---
ERC N-3-3	---	3,417	---	---	---
ERC N-56-3	---	2,044	---	---	---
ERC N-161-4	---	---	---	---	92,898
SSPE2	2,045,674	183,702	157,901	674,489	555,500

3. Stationary Source Increase in Permitted Emissions (SSIPE)

$$\text{SSIPE} = \text{SSPE2} - \text{SSPE1}$$

The SSPE1 and SSPE2 balances are from sections VII.E.1 and VII.E.2 of this document. Since only positive SSIPE values have meaning, negative values will be set to zero.

	SSPE2 (lb/yr)	SSPE1 (lb/yr)	SSIPE (lb/yr)
NOx	2,045,674	2,045,674	0
CO	183,702	183,702	0
VOC	157,901	157,901	0
SOx	674,489	674,489	0
PM10	555,500	555,495	5

4. Baseline Emissions

Baseline Emissions are used to determine the quantity of offsets required. As shown in section VIII (Rule 2201 Compliance), offsets are not required. Therefore, Baseline Emission calculations are not necessary.

F. Major Source Determination

Rule 2201 Major Source Determination:

The Major Source thresholds, the facility potentials to emit and whether or not the facility is a Major Source are shown on the following table. The Major Source thresholds are from Section 3.24.1 of Rule 2201 and the facility PE's are from section VII.E.2 of this document.

Pollutant	Threshold (lb/yr)	Facility PE (lb/yr)	Major Source
NOx	20,000	947,806	Yes
CO	200,000	178,241	No
VOC	20,000	157,901	Yes
SOx	140,000	674,489	Yes
PM10	140,000	462,602	Yes

Rule 2410 Major Source Determination:

The Major Source thresholds, the facility potentials to emit and whether or not the facility is a Major Source are shown on the following table.

Pollutant	Threshold (tons/yr)	Facility PE (lb/yr)	Major Source
NOx	250	473.9	Yes
CO	250	The facility is a Rule 2410 Major Source for NOx. Therefore, the facility is a PSD Major Source and determinations for the other pollutants are not necessary.	
VOC	250		
SOx	250		
PM10	250		
PM	250		
CO ₂ e	100,000		

G. Major Modification Determination

SB-288 Major Modification:

The purpose of SB-288 Major Modification calculations is to determine the following:

If Best Available Control Technology (BACT) is required for a Major Source pollutant from a new or modified emission unit involved in a permitting action that is a Major Modification (District Rule 2201, §4.1.3); and

If a public notification is triggered (District Rule 2201, §5.4.1).

Per section 3.36 of Rule 2201 and the District's draft policy titled Implementation of Rule 2201 (as amended on 12/18/08 and effective on 6/10/10) for SB-288 Major Modifications and Federal Major Modifications, a permitting action is an SB-288 Major Modification if the Net Emission Increase (NEI) for the new and modified units involved in the project exceed the thresholds shown on the following table. The equipment currently under consideration will emit only PM10, therefore, only PM10 will be addressed.

Pollutant	Threshold (lb/yr)
PM10	30,000

As shown in section VII.C.1 of this document, the potential to emit of PM10 from the unit currently under consideration is less than its SB-288 Major Modification threshold. Therefore, this permitting action is not an SB-288 Major Modification.

Federal Major Modification:

Per the District's draft policy titled "Implementation of Rule 2201 (as amended on 12/18/08 and effective on 6/10/10) for SB288 Major Modifications and Federal Major Modifications", if the average increase in emissions is 0.5 lb/day or less then the project is not a Federal Major Modification.

$$\text{Average IPE} = (5 \text{ lb/yr} - 0 \text{ lb/yr}) / (365 \text{ days/yr}) = 0.01 \text{ lb/day}$$

The average IPE will not exceed 0.5 lb/day, therefore, this permitting action is not a Federal Major Modification.

VIII. Compliance

Rule 2201 New and Modified Stationary Source Review Rule

A. BACT

1. BACT Applicability

New or Relocated Units:

Except for CO, BACT is required for each pollutant with a PE of greater than 2.0 pounds per day. For CO, BACT is required if the PE of CO is greater than 2.0 pounds per day and the SSPE2 of CO is 200,000 pounds per year or greater.

Modified Units:

Except for CO, BACT is required for each pollutant with an AIPE of greater than 2.0 pounds per day. For CO, BACT is required if the AIPE of CO is greater than 2.0 pounds per day and the SSPE2 of CO is 200,000 pounds or greater.

Major Modifications:

BACT is required for the pollutants for which an SB-288 or a Federal Major Modification is triggered.

Applicability:

The proposed unit is new and the permitting action is not an SB-288 or Federal Major Modification. Therefore, whether or not BACT is required is dependent only on the PE. Since the permitted equipment will emit only PM10, an applicability determination is required only for PM10. The table below shows the PE of PM10 and whether or not BACT is required.

Operation	PE (lb/day)	BACT Required
Overflow Storage System	0.0 (see note below)	No

The daily emissions were determined to be 0.014 lb/day and were set to zero per District policy APR-1105.

2. BACT Analysis

As shown above, BACT is not required. Therefore, a BACT analysis is not necessary.

B. OFFSETS

1. Offset Applicability

Per section 4.5.3 of Rule 2201, offsets are examined on a pollutant by pollutant basis and are triggered for any pollutant with an SSPE2 equal to or greater than the value on the following table. Since the unit currently under consideration will emit only PM10, an analysis is required only for PM10.:

Pollutant	SSPE2 (lb/yr)
PM10	29,200

As shown in section VII.E.2 of this document, the SSPE2 of each pollutant is:

Pollutant	SSPE2 (lb/yr)	Offsets Triggered
PM10	555,498	Yes

2. Quantity of Offsets Required

Per draft District policy APR-1130 (March 14, 2013) "Increases in Maximum Daily Permitted Emissions of Less than or Equal to 0.5 lb/day", increases in emissions of 0.5 lb/day (less than or equal to 0.54 lb/day) are to be set to zero for the purpose of determining offset quantities.

$$PE1_{PM10} = 0 \text{ lb/yr}$$

$$PE2_{PM10} = 5 \text{ lb/yr}$$

$$IPE_{PM10} = (5 \text{ lb/yr} - 0 \text{ lb/yr}) / (365 \text{ days/yr}) = 0.01 \text{ lb/day}$$

The calculated offset quantity does not exceed 0.5 lb/day, therefore, per District policy APR-1130, offsets are not required.

C. PUBLIC NOTIFICATION

1. Applicability

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

- a. New Major Sources
- b. Major Modifications
- c. New emission units with a PE > 100 lb/day of any one pollutant (IPE Notifications)
- d. Modifications with SSPE1 below an offset threshold and SSPE 2 above an offset threshold on a pollutant by pollutant basis (Existing Facility Offset Threshold Exceedence Notification)
- e. New stationary sources with SSPE2 exceeding offset thresholds (New Facility Offset Threshold Exceedence Notification)

f. Any permitting action with a SSIPE exceeding 20,000 lb/yr for any one pollutant. (SSIPE Notice)

a. New Major Source Notice Determination:

The facility is not new, therefore, a New Major Source Determination notice is not required.

b. Major Modification Notice:

As shown in section VII.G of this document, this permitting action is not a Federal Major Modification or an SB-288 Major Modification. Therefore, a public notice is not required.

c. PE Notification:

A notification is required for each project that includes a new emission unit with the potential to emit more than 100 pounds per day of any one affected pollutant. This permitting action includes a new unit, however, its potential to emit will not exceed 100 lb/day. Therefore, a notification is not required.

d. Existing Facility Offset Threshold Exceedence Notification

The SSPE of no pollutant will go from below to above an offset threshold. Therefore, a public notification is not required.

e. New Facility Offset Threshold Exceedence Notification

This is an existing facility. Therefore, a public notification is not required.

f. SSIPE Notification:

A notification is required for any permitting action that results in an SSIPE of more than 20,000 lb/yr of any affected pollutant. As shown in section VII.E.3 of this document, the SSIPE of each pollutant will be less than 20,000 pounds per year. An SSIPE notification is not required.

2. Public Notice

As shown above, a public notification is not required.

D. DAILY EMISSION LIMITS

The PM10 emissions shall not exceed 0.007 lb/ton of throughput.

The throughput shall not exceed 2 tons per day.

E. Compliance Assurance

1. Source Testing

Per District policy SSP 2105, baghouses with expected emissions of over 30 lb/day must undergo an initial source test. As shown in section VII.C.1 of this document, the baghouse emissions will be less than 30 lb/day, therefore source testing is not required.

2. Monitoring

District guidance document FYI-125 requires the facility to monitor the baghouse pressure differential gauge reading at least once each day that it operates. Such monitoring will be required.

3. Record Keeping

The daily emissions will be limited in terms of throughput. Therefore, records of the daily throughputs will be required.

District guidance document FYI-125 requires the facility operator to record the baghouse pressure differential gauge reading once each day that the baghouse operates and requires records of all baghouse maintenance, including filter media change outs. Such records will be required.

4. Reporting

As they apply to the equipment currently under consideration, no District rule or policy requires reporting.

F. Alternative Siting Analysis

Section 4.15.1 of Rule 2201 requires an alternative siting analysis for new Major Sources and permitting actions that are Federal Major Modifications. The facility is not a new Major Source and this permitting action is not a Federal Major Modification, therefore, this section does not apply.

G. Compliance by Other Owned, Operated or Controlled Sources

Section 4.15.2 of this rule requires that the owner of a new Major Source or a source undergoing a Federal Major Modification to demonstrate to the satisfaction of the District that all other Major Sources owned by such person and operating in California are in compliance with all applicable emission limitations and standards. The facility is not a new Major Source and this permitting action is not a Federal Major Modification. Therefore, this section does not apply.

H. Reconstructed Stationary Source Determination

Per section 3.25.2 of this rule, a reconstructed Stationary Source shall be treated as a new Stationary Source and not as a modification. To ensure that the requirements of Rule 2201 are properly applied, a reconstructed Stationary Source determination is necessary. For the purpose of this analysis, the section 3.34 definition of Reconstructed Source will be used. The definition of Reconstructed Source is:

any Stationary Source undergoing reconstruction where the fixed capital cost of the new components exceeds 50% of the fixed capital cost of a comparable, entirely new Stationary Source. Fixed capital cost is the capital needed to provide depreciable components. Reconstructed Source cost shall include only the cost of all emission-producing equipment and associated integral activities at the stationary source. A reconstructed Stationary Source shall be considered a new Stationary Source and not as a modification of an existing Stationary Source.

The Stationary Source includes numerous pieces of emission producing equipment and related infrastructure. The cost of the proposed modifications will not exceed 50% of the value of the entire Stationary Source (including only the emission producing equipment and associated infrastructure). Therefore, the facility is not a reconstructed Stationary Source.

Rule 2410 Prevention of Significant Deterioration

As shown in section VII.F of this document, the facility is a PSD Major Source. Since the facility is more than 10 kilometers from each Class 1 area, whether or not any action is required depends on whether the project will have a Significant Emission Increase. If it will, then further action will be required. If it will not, then no further action is necessary.

PSD Significant Emission Increase Determination: Emission Increase (Tons/yr)						
	NO ₂	SO ₂	CO	PM	PM ₁₀	CO ₂ e
Emission Increases	0	0	0	0.0025	0.0025	0
PSD Significant Emission Increase Thresholds	40	40	100	25	15	75,000
PSD Significant Emission Increase?	No	No	No	No	No	No

As can be seen, the emission increases associated with this project are less than the PSD significant emission increase thresholds. Therefore, this permitting action is not a PSD Major Modification.

Rule 2520 Federally Mandated Operating Permits

The proposed permitting action is a Minor Title V permit modification. The applicant has proposed to receive the ATC with a Certificate of Conformity in accordance with the requirements of 40 CFR 70.6(c), 70.7 and 70.8. Therefore, the 45-day EPA comment period will be satisfied prior to the issuance of the ATC. The following federally enforceable conditions will be placed on the Authority to Construct:

This Authority to Construct serves as a written Certificate of Conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c).

Prior to operating with the modifications authorized by this Authority to Construct, the facility shall submit an application for an Administrative Amendment to its Title V permit.

Rule 4101 Visible Emissions

As long as the equipment is properly maintained and operated, the visible emissions are not expected to exceed 20% opacity for a period or periods aggregating more than 3 minutes in any one hour. Compliance with the provisions of this rule is expected.

The operation will be served by a baghouse that is expected to provide 99% or greater control of the material captured. District Policy SSP 1005 requires that the visible emissions from the baghouses be limited to less than 5% opacity for a period or periods aggregating more than three minutes in any one hour. Such a condition will be placed on the ATC and on the PTO. Provided that the equipment is properly maintained and operated, compliance with this policy is expected.

Rule 4102 Nuisance

A. California Health & Safety Code 41700 (Risk Management Review)

A Risk Management Review (RMR) was conducted by the Technical Services Division of the SJVAPCD. As shown on the RMR summary that is in Appendix C of this document, the cancer risk will be 0.00093 in one million and the acute and chronic hazard indices will be 1.22×10^{-3} and 1.64×10^{-4} respectively. The application is therefore approvable per District policy APR-1905.

B. Toxics BACT (T-BACT)

As shown on in the RMR summary that is in Appendix B of this document, Toxics BACT is not required.

Rule 4201 Particulate Matter Concentration

This rule limits the particulate matter concentration to 0.1 gr/dscf of exhaust flow.

Hourly Throughput: 4,000 lb
Flow Rate: 225 acfm
EF_{PM10}: 0.0035 lb/10³ lb

$$\text{PM Rate} = (0.0035 \text{ lb}/10^3 \text{ lb})(4,000 \text{ lb}/\text{hr}) = 0.014 \text{ lb}/\text{hr}$$

$$\text{PM Concentration} = (\text{min}/225 \text{ ft}^3)(0.014 \text{ lb PM}/\text{hr})(7,000 \text{ gr}/\text{lb})(1 \text{ hr}/60 \text{ min}) \\ = 0.007 \text{ gr}/\text{ft}^3$$

The expected particulate matter concentration is less than the limit, therefore compliance is expected.

Rule 4202 Particulate Matter – Emission Rate

The purpose of this rule is to limit the TSP emission rate based on the throughput of the operation. The equation used to calculate the maximum allowable emission rate is:

$$E_{\text{max}} = 17.31P^{0.16}, \text{ where } P > 30 \text{ tons}/\text{hr}$$

$$E_{\text{max}} = 3.59P^{0.62}, \text{ where } P \leq 30 \text{ tons}/\text{hr}$$

Where: E = Maximum allowable emissions in lb/hr
P = Process weight in tons/hr

Hourly Throughput: 4,000 lb
EF_{PM10}: 0.0035 lb/10³ lb

$$E_{\text{actual}} = (0.0035 \text{ lb}/10^3 \text{ lb})(4,000 \text{ lb}/\text{hr}) = 0.014 \text{ lb}/\text{hr}$$

$$E_{\text{max}} = 3.59(2)^{0.62} = 5.5 \text{ lb}/\text{hr}$$

E_{actual} will be less than E_{max}, Therefore, compliance is expected.

California Environmental Quality Act (CEQA)

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

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities;

- Identify the ways that environmental damage can be avoided or significantly reduced;
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; 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 § 15031 (Existing Facilities), and finds that the project is exempt per the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment (CEQA Guidelines §15061(b)(3)).

California Health & Safety Code 42301.6 (School Notice)

The equipment will not be located within 1,000 feet of a K-12 school, therefore, a school notice is not required.

IX. Recommendation

Issue an Authority to Construct permit with the conditions on the attached draft Authorities to Construct after successful completion of the required COC notice.

X. Billing Information

Permit #	Description	Fee Schedule
N-1662-16-0	Miscellaneous	3020-6

Note: The receiving/storage equipment and the dust collector are unpowered.

Appendices

Appendix A: Draft ATC

Appendix B: Risk Management Review Summary

Appendix C: TV-009 Form

Appendix A

Draft Authority to Construct

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: N-1662-16-0

LEGAL OWNER OR OPERATOR: GALLO GLASS COMPANY

MAILING ADDRESS: PO BOX 1230
MODESTO, CA 95353

LOCATION: 605 S SANTA CRUZ AVE
MODESTO, CA 95354

EQUIPMENT DESCRIPTION:

WASTE OVERFLOW SYSTEM SERVING THE ELECTROSTATIC PRECIPITATOR AND THE CERAMIC FILTER DUST COLLECTOR. THE SYSTEM CONSISTS OF A PORTABLE ENCLOSED STORAGE BIN OR BULK BAGS, A PNEUMATIC DELIVERY SYSTEM AND A DYNAMIC AIR 36A-9 SERIES 250 MODULE KLEEN DUST COLLECTOR.

CONDITIONS

1. This Authority to Construct serves as a written Certificate of Conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. Prior to operating with the modifications authorized by this Authority to Construct, the facility shall submit an application for an Administrative Amendment to its Title V permit. [District Rule 2520] Federally Enforceable Through Title V Permit
3. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
4. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
5. The visible emissions from the baghouse shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Bulk bags shall be sealed to the filler spout during filling. [District Rule 2201] Federally Enforceable Through Title V Permit
7. The combined amount of material transported to the storage bin and bulk bags shall not exceed 2 tons during any one day. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO

DAVID WARNER, Director of Permit Services

N-1662-16-0: Sep 13 2013 7:40AM - SCHONHOM : Joint Inspection NOT Required

8. The PM10 emissions shall not exceed 0.007 lb/ton of material transported to the storage bin or bulk bags. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The baghouse shall operate at all times with a minimum differential pressure of 6 inch of water column and a maximum differential pressure of 12 inches of water column. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The baghouse shall be maintained and operated according to the manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
12. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Material removed from the baghouse shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Replacement bags numbering at least 10% of the total number of bags in the largest baghouse, and for each type of bag, shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Differential operating pressure of the baghouse shall be monitored and recorded on each day that it operates. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Records of all maintenance of the baghouse, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Daily records of the amount of material transported to the storage bin and bulk bags, in tons, shall be kept. [District Rule 2201] Federally Enforceable Through Title V Permit
18. All records shall be retained on-site for a period of at least five years and shall be made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit

DRAFT

Appendix B

Risk Management Review Summary

San Joaquin Valley Air Pollution Control District Risk Management Review

To: Mark Schonoff– Permit Services
 From: Kou Thao– Technical Services
 Date: 9-9-13
 Facility Name: Gallo Glass Co
 Location: 605 S. Santa Cruz Ave, Modesto, CA
 Application #(s): N-1662-16-0
 Project #: N-1132601

A. RMR SUMMARY

RMR Summary			
Categories	ESP waste collector (Unit 16-0)	Project Totals	Facility Totals
Prioritization Score	3.46E-04	3.46E-04	>1
Acute Hazard Index	1.22E-03	1.22E-03	1.10E-02
Chronic Hazard Index	1.64E-04	1.64E-04	5.76E-03
Maximum Individual Cancer Risk (10⁻⁶)	9.30E-10	9.30E-10	7.81E-07
T-BACT Required?	No		
Special Permit Conditions?	No		

Proposed Permit Conditions

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

Unit # 16-0

No special conditions are required.

B. RMR REPORT

I. Project Description

Technical Services received a request on August 28, 2013, to perform a Risk Management Review for a proposed installation of an overflow system for the material captured by the glass furnace ESP and ceramic filter dust collector

II. Analysis

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

The following parameters were used for the review:

Analysis Parameters Unit 16-0			
Source Type	Point	Location Type	Urban
Stack Height (m)	5.18	Closest Receptor (m)	150
Stack Diameter. (m)	0.27	Type of Receptor	Residential
Stack Exit Velocity (m/s)	1.73	PM lbs/hr	0.000011
Stack Exit Temp. (°K)	Ambient	PM lbs/yr	0.0038
Exhaust stack configuration	Horizontal		

III. Conclusion

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

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

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

IV. Attachments

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

Appendix C
TV-009 Form

**San Joaquin Valley
Unified Air Pollution Control District**

TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

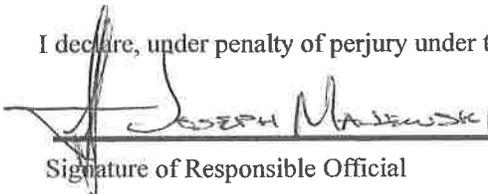
- SIGNIFICANT PERMIT MODIFICATION ADMINISTRATIVE
 MINOR PERMIT MODIFICATION AMENDMENT

COMPANY NAME: GALLO GLASS COMPANY	FACILITY ID: N- 1662
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: Gallo Glass Company	
3. Agent to the Owner:	

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

- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

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



Signature of Responsible Official

7/17/13

Date

Joseph Majewski

Name of Responsible Official (please print)

Sr. Director - Operations

Title of Responsible Official (please print)