



JUL 08 2013

Mr. Rick Ekberg
Elk Corporation of Texas
6200 Zerker Road
Shafter, CA 93263

Re: Notice of Minor Title V Permit Modification
District Facility # S-2033
Project # 1132635

Dear Mr. Ekberg:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued Authorities to Construct (ATCs) S-2033-9-9, '-9-10, and '-12-7 into the Title V operating permit. The ATCs authorized installation of bins served by an existing dust collector (ATC S-2033-9-9) and modifications to the method in which back-surfacing fines are applied to shingles in the asphalt roofing shingle manufacturing operation (ATCs S-2033-9-10 and '-12-7).

You also requested that permit conditions reflecting 40 CFR Subpart UU requirements, which were added erroneously to S-2033-9, and the redundant words "dust collector" which follow "high velocity air filter" in current PTO S-2033-12-5 conditions, not be included in the final PTOs. PTO S-2033-10-5 was also revised to delete "dust collector" following the words "high velocity air filter."

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued Authorities to Construct (ATCs) S-2033-9-9, '-9-10, and '-12-7, application, and current Title V PTOs. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

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

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

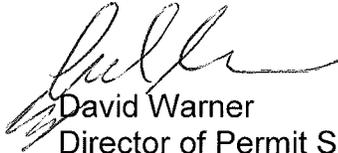
Southern Region
34946 Flyover Court
Bakersfield, CA 93308-9725
Tel: 661-392-5500 FAX: 661-392-5585

JUL 08 2013

Mr. Ekberg
Page 2

Thank you for your cooperation in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Warner", is written over the printed name and title.

David Warner
Director of Permit Services

Enclosures

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

TITLE V APPLICATION REVIEW

Minor Modification
Project #: S-1132635

Engineer: Richard Edgehill
Date: June 27, 2013

Facility Number: S-2033
Facility Name: Elk Corporation of Texas
Mailing Address: 6200 Zerker Road
Shafter, CA 93263

Reviewed by ASURE ADE

JUN 27 2013

Contact Name: Rick Ekberg
Production Manager

Phone: (661) 391-3936

Responsible Official: Rick Ekberg
Title: Production Manager

I. PROPOSAL

Elk Corporation of Texas is proposing a minor modification to their Title V permit to incorporate Authorities to Construct (ATC) S-2033-9-9, '-9-10, and '-12-7 and to administratively correct PTOs S-2033-10-5 and '-12-6. Permit conditions reflecting 40 CFR Subpart UU requirements, which were added erroneously to '-9, and the redundant words "dust collector" which follow "high velocity air filter" included in '-10 and '-12 conditions, are not included in the final PTOs. Please note that deletion of the 40 CFR Subpart UU conditions from S-2033-9 does not represent a relaxation in monitoring or recordkeeping requirements (Title V Significant Modification) as these conditions are not relevant to the permit unit.

The purpose of this evaluation is to identify all applicable requirements, to determine if the facility will comply with the applicable requirements, and to provide the legal and factual basis for the proposed revisions.

II. FACILITY LOCATION

The equipment is located at 6200 Zerker Rd, Shafter, CA.

III. EQUIPMENT DESCRIPTION

S-2033-9-11: ASPHALT ROOFING SHINGLE MANUFACTURING OPERATION INCLUDING UNWIND STAND, DRY FELT LOOPER SERVED BY DUST COLLECTOR (DC-4) ULTRA INDUSTRIES MODEL BD 400-120 III; DISTRIBUTION HOPPER, CONVEYORS, BUCKET ELEVATORS, USE BINS, DISTRIBUTOR, BACK SURFACING/GRANULES APPLICATOR, SERVED BY DUST COLLECTOR DC-5 (LISTED ON S-2033-8); BACK SURFACING FINES HOPPER SERVED BY DUST COLLECTOR (DC-6) ULTRA INDUSTRIES MODEL BBX 6-58-IIG; COOLING DRUMS AND FINISHED PRODUCT LOOPER

S-2033-10-6: ASPHALT RECEIVING AND STORAGE OPERATION INCLUDING ONE 20,000 GALLON RECEIVING TANK, TWO 16,000 GALLON STORAGE TANKS, AND THREE 90,000 GALLON STORAGE TANKS

S-2033-12-8: ASPHALT ROOFING SHINGLE COATING OPERATION WITH MACHINE LINE FUME COLLECTION SYSTEM VENTED TO HIGH VELOCITY AIR FILTER (FCS-1)

IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

VI. DESCRIPTION OF PROPOSED MODIFICATIONS

S-2033-9

The following 40 CFR Subpart UU conditions (and 40 CFR Subpart UU reference) were included on PTO S-2033-9-8 in error. 40 CFR Subpart UU conditions are applicable to saturators which are not included in permit unit S-2033-9. All other conditions from current PTO S-2033-9-8 were included.

2. ~~Continuous temperature monitoring equipment (with accuracy of +/- 15 Celsius degrees (+/- 27 Fahrenheit degrees) over its range) shall be installed at inlet of high-velocity air filters. [40 CFR 60.473] Y~~

7. There shall be no visible emissions greater than 0% opacity from mineral conveying, handling, and storage. [District Rule 2201 and 40-CFR-60.472] Y
9. ~~Particulate matter emissions shall not exceed 0.08 lb/ton of asphalt shingle produced. [40 CFR 60.472] Y~~
25. ~~The industry is exempted from the quarterly reports required under 40 CFR 60.7. During performance testing, the operating temperature of the high velocity air filters shall be recorded and reported as required by 40 CFR 60.7 (d). Facility shall maintain a file of temperature monitoring results for at least 5 years. [40 CFR 60.473] Y~~
26. ~~For saturators, performance tests required under 40 CFR 60.8 shall conducted using procedures in 40 CFR 60.474 (a)-(e). [40 CFR 60.474] Y~~
27. ~~Method 9 and the procedures in 40 CFR 60.11 shall be used to measure opacity. [40 CFR 60.474] Y~~
28. ~~The administrator shall determine compliance with the standards in CFR 60.472 (a)(3) by using Method 22, modified so that readings are recorded every 15 seconds for a period of consecutive observations during representative conditions (in accordance with 40 CFR 60.8 (c) totalling 60 minutes. A performance test shall consist of one run. [40 CFR 60.474] Y~~
29. ~~The owner and operator shall use the monitoring device in 60.473 (a) to monitor and record continuously the temperature during the particulate matter run and shall report the results to the Administrator with the performance test results. [40 CFR 60.474] Y~~

S-2033-10 and '-12

All conditions included on the current PTOs were included on the draft PTOs. Please note that the current PTOs include mixed wording of "dust collector" following "high velocity air filter." The redundant (and confusing) words "dust collector" were not included on the draft PTOs as the units contain high velocity air filters. This change is considered administrative.

VII. COMPLIANCE

In accordance with Rule 2520, 3.20, 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.

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

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

VIII. ATTACHMENTS

- A. Proposed draft Title V PTOs
- B. Authorities to Construct
- C. Permit Application
- D. Previous Title V PTOs

ATTACHMENT A

Proposed Draft Title V PTOs

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-2033-9-11

EXPIRATION DATE: 04/30/2017

SECTION: 15 **TOWNSHIP:** 28S **RANGE:** 26E

EQUIPMENT DESCRIPTION:

ASPHALT ROOFING SHINGLE MANUFACTURING OPERATION INCLUDING UNWIND STAND, DRY FELT LOOPER SERVED BY DUST COLLECTOR (DC-4) ULTRA INDUSTRIES MODEL BD 400-120 III; DISTRIBUTION HOPPER, CONVEYORS, BUCKET ELEVATORS, USE BINS, DISTRIBUTOR, BACK SURFACING/GRANULES APPLICATOR, SERVED BY DUST COLLECTOR DC-5 (LISTED ON S-2033-8); BACK SURFACING FINES HOPPER SERVED BY DUST COLLECTOR (DC-6) ULTRA INDUSTRIES MODEL BBX 6-58-IIG; COOLING DRUMS AND FINISHED PRODUCT LOOPER

PERMIT UNIT REQUIREMENTS

1. All equipment shall be constructed, maintained and operated according to the specifications and plans contained in the permit application except as otherwise specified herein. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The APCO or any authorized representative, upon request, shall have access to inspect any equipment, operation, or method required in this permit, and to sample emissions from the source or require samples to be taken. [District Rule 1081] Federally Enforceable Through Title V Permit
3. Dust collectors shall be maintained and operated according to manufacturers' recommendations. [District Rule 2201] Federally Enforceable Through Title V Permit
4. All conveyors and bucket elevators shall be enclosed. [District Rule 2201] Federally Enforceable Through Title V Permit
5. There shall be no visible emissions greater than 5% opacity from cooling drums, finished product looper, and exhaust gas of dust collectors. [District Rule 2201] Federally Enforceable Through Title V Permit
6. There shall be no visible emissions greater than 0% opacity from mineral conveying, handling, and storage. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Visible emissions from dust collectors DC-4, DC-5, and DC-6 serving the asphalt roofing shingle manufacturing operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Maximum particulate matter (PM10) emission rate from dust collector DC-4 shall not exceed 0.02 lb per ton of glass mat processed. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Maximum particulate matter (PM10) emission rate from dust collector DC-5 shall not exceed 0.0002 lb per ton of asphalt roofing shingle produced plus 0.00027 lb per ton of filler material processed by the filler heating operation, when in use. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Maximum particulate matter (PM10) emission rate from dust collector DC-6 shall not exceed 0.00027 lb per ton of back surfacing fines processed. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Compliance source testing with PM10 emission rate(s) shall be demonstrated within 60 days upon detection of visible emissions greater than 5% opacity from the dust collector(s) exhaust. [District Rule 1070]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

12. 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
13. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
14. Total facility shingle production rate shall not exceed 3998 tons/day, glass mat process rate shall not exceed 80 tons/day, and back surfacing fines process rate shall not exceed 300 tons/day without prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The APCO or authorized representative shall have the authority to require mitigation of toxic emissions if total facility health risks are determined to be significant pursuant to Air Toxics "Hot Spot" Information and Assessment Act of 1987. [District Rule 2201] Federally Enforceable Through Title V Permit
16. DC-4 and DC-5 dust collectors shall be equipped with a differential pressure monitor to continuously indicate and record the pressure drop across the filter media. [40 CFR 64.3] Federally Enforceable Through Title V Permit
17. DC-4 and DC-5 dust collectors shall operate with a minimum differential pressure of 0 inches water column and a maximum differential pressure of 15 inches water column. These parameters shall be reviewed annually and revised if necessary based on PM10 source test result data, historical operating data and manufacturer/supplier recommendations. [40 CFR 64.3] Federally Enforceable Through Title V Permit
18. During each day of operation, the permittee shall record the differential pressure of DC-4 and DC-5 dust collectors and compare the readings with the permitted range. If the baghouses' differential pressure falls outside the permitted range, the permittee shall take all necessary steps to return the baghouses' differential pressure to within the permitted range as soon as possible, but no longer than three hours after detection. If the differential pressure cannot be returned within the permitted range after three hours of operation following detection, the permittee shall shut the operation down and make all necessary repairs to bring the differential pressure back to within the permitted range. [40 CFR Part 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 part 64.8. [40 CFR 64.8] Federally Enforceable Through Title V Permit
20. Fabric collection system of DC-4, DC-5, and DC-6 dust collectors shall be completely inspected annually while in operation for evidence of particulate matter breakthrough and shall be repaired as needed. [District Rule 2201] Federally Enforceable Through Title V Permit
21. DC-4, DC-5, and DC-6 dust collectors filters shall be completely inspected annually while not in operation for tears, scuffs, abrasives or holes which might interfere with PM collection efficiency and shall be replaced as needed. [District Rule 2201] Federally Enforceable Through Title V Permit
22. Visible emissions from DC-4 and DC-5 dust collectors shall be evaluated using EPA Method 22 for a period of at least 6 minutes at least once per each week 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 collection 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. [40 CFR 64] Federally Enforceable Through Title V Permit
23. Records of DC-4 and DC-5 dust collectors filter maintenance, inspection, and repairs shall be maintained. The records shall include identification of equipment, date of inspection, corrective action taken, and identification of individual performing inspection. [District Rule 1070]
24. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR 64.9] Federally Enforceable Through Title V Permit
25. Permittee shall maintain accurate daily records of shingle production rate and glass mat & back surfacing fines process rates, and such records shall be made readily available for District inspection upon request for a period of five years. [District Rule 1070]

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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-2033-10-6

EXPIRATION DATE: 04/30/2017

EQUIPMENT DESCRIPTION:

ASPHALT RECEIVING AND STORAGE OPERATION INCLUDING ONE 20,000 GALLON RECEIVING TANK, TWO 16,000 GALLON STORAGE TANKS, AND THREE 90,000 GALLON STORAGE TANKS

PERMIT UNIT REQUIREMENTS

1. All equipment shall be constructed, maintained and operated according to the specifications and plans contained in the permit application except as otherwise specified herein. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The APCO or any authorized representative, upon request, shall have access to inspect any equipment, operation, or method required in this permit, and to sample emissions from the source or require samples to be taken. [District Rule 1081] Federally Enforceable Through Title V Permit
3. Operation shall include Monsanto Enviro-Chem Systems, Inc. model AVP-1000 high velocity air filter FCS-2 with 10 hp exhaust blower, serving asphalt receiving/storage tanks. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Visible emissions shall not exceed 0% opacity except for one consecutive 15-minute period in any 24-hour period when clearing transfer lines. [District Rule 2201 and 40 CFR 60.472] Federally Enforceable Through Title V Permit
5. Continuous temperature monitoring equipment (with accuracy of +/- 15 degrees Celsius over its range) shall be installed at inlet of high velocity air filter. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Tank roof appurtenances shall be maintained leak-free, as defined in Rule 4623. [District Rule 4623] Federally Enforceable Through Title V Permit
7. Maximum particulate matter (PM10) emission rate from high velocity air filter FCS-2 shall not exceed 1.23 lb/hr. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Maximum volatile organic compounds (VOC) emission rate from high velocity air filter FCS-2 shall not exceed 1.23 lb/hr. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Total facility asphalt received shall not exceed 919 tons/day without prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The APCO or authorized representative shall have the authority to require mitigation of toxic emissions if total facility health risks are determined to be significant pursuant to Air Toxics "Hot Spot" Information and Assessment Act of 1987. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Monsanto Enviro-Chem Systems, Inc. model AVP-1000 high velocity air filter FCS-2 shall be equipped with a differential pressure monitor to continuously indicate and record the pressure drop across the filter media. [40 CFR 64.3] Federally Enforceable Through Title V Permit
12. Monsanto Enviro-Chem Systems, Inc. model AVP-1000 high velocity air filter FCS-2 shall operate with a minimum differential pressure of 0 inches water column and a maximum differential pressure of 27 inches water column. These parameters shall be reviewed annually and revised if necessary based on PM10 source test result data, historical operating data and manufacturer/supplier recommendations. [40 CFR 64.3] 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. During each day of operation, the permittee shall record the differential pressure of the Monsanto Enviro-Chem Systems, Inc. model AVP-1000 high velocity air filter FCS-2 and compare the readings with the permitted range. If the baghouses' differential pressure falls outside the permitted range, the permittee shall take all necessary steps to return the baghouses' differential pressure to within the permitted range as soon as possible, but no longer than three hours after detection. If the differential pressure cannot be returned within the permitted range after three hours of operation following detection, the permittee shall shut the operation down and make all necessary repairs to bring the differential pressure back to with the permitted range. [40 CFR Part 64] Federally Enforceable Through Title V Permit
14. Fabric collection system of Monsanto Enviro-Chem Systems, Inc. model AVP-1000 high velocity air filter FCS-2 shall be completely inspected annually while in operation for evidence of particulate matter breakthrough and shall be repaired as needed. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Monsanto Enviro-Chem Systems, Inc. model AVP-1000 high velocity air filter FCS-2 shall be completely inspected annually while not in operation for tears, scuffs, abrasives or holes which might interfere with PM collection efficiency and shall be replaced as needed. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Visible emissions from Monsanto Enviro-Chem Systems, Inc. model AVP-1000 high velocity air filter FCS-2 shall be evaluated using EPA Method 22 for a period of at least 6 minutes at least once per each week the model AVP-1000 high velocity air filter FCS-2 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 collection 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. [40 CFR 64] Federally Enforceable Through Title V Permit
17. Method 9 and the procedures in 40 CFR 60.11 shall be used to measure opacity. [40 CFR 60.474] Federally Enforceable Through Title V Permit
18. Records of Monsanto Enviro-Chem Systems, Inc. model AVP-1000 high velocity air filter FCS-2 maintenance, inspection, and repairs shall be maintained. The records shall include identification of equipment, date of inspection, corrective action taken, and identification of individual performing inspection. [District Rule 1070]
19. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR 64.9] Federally Enforceable Through Title V Permit
20. Permittee shall maintain accurate daily records of facility asphalt received and temperature monitoring results, and shall make such records readily available for District inspection upon request for a period of five years. [District Rule 1070]

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

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-2033-12-8

EXPIRATION DATE: 04/30/2017

SECTION: 15 **TOWNSHIP:** 28S **RANGE:** 26E

EQUIPMENT DESCRIPTION:

ASPHALT ROOFING SHINGLE COATING OPERATION WITH MACHINE LINE FUME COLLECTION SYSTEM VENTED TO HIGH VELOCITY AIR FILTER (FCS-1)

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PERMIT UNIT REQUIREMENTS

1. All equipment shall be constructed, maintained and operated according to the specifications and plans contained in the permit application except as otherwise specified herein. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
3. Operation shall include Monsanto Enviro-Chem Systems, Inc. model EEE high velocity air filter FCS-1 with 200 hp exhaust blower. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operation shall include two continuous mixers, 4000 gallon surge tank with agitator, filled coating applicator, sealdown applicator with three 2000 gallon sealdown storage and mix tanks served by high velocity air filter FCS-1. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Operation shall include laminator sealdown applicator, laminator adhesive applicator, and five 250 gallon use tanks served by high velocity air filter FCS-1. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Operation shall include oil pump and 1000 gallon reclaim oil storage tank. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Continuous temperature monitoring equipment (with accuracy of +/- 15 degrees Celsius over its range) shall be installed at inlet of high velocity air filter. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Continuous temperature monitoring results shall be maintained for District inspection upon request for at least five years. [District Rule 1070]
9. Each tank roof appurtenance shall be maintained leak-free (no reading in excess of 10,000 ppm as methane measured at a distance of one centimeter from the source). [District Rule 4623] Federally Enforceable Through Title V Permit
10. Maximum flow rate through high velocity air filter FCS-1 shall not exceed 25,200 acfm. Flow control damper shall be maintained at setting shown to demonstrate compliance with flow limit during source testing. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Visible emissions shall not exceed 1/4 Ringelmann or 5% opacity. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Particulate matter emissions shall not exceed 0.08 lb/ton of asphalt shingle produced. [40 CFR 60.472] Federally Enforceable Through Title V Permit
13. Emission rate from shingle coating operation shall not exceed: PM10: 0.88 lb/hr and 6638 lb/yr, and VOC: 5.04 lb/hr and 37,996 lb/yr. [District Rule 2201] 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.

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14. Total quantity of coating asphalt, sealant asphalt, and laminate adhesive asphalt introduced to asphalt roofing shingle coating operation (S-2033-12) shall not exceed 657 tons/day and 206,500 tons/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Source testing to demonstrate compliance with PM10 and VOC emission limits shall be conducted not less than once every 12 months, except as provided below. [District Rule 1070]
16. Source testing to demonstrate compliance with PM10 and VOC emission limits shall be conducted not less than once every 36 months if compliance is demonstrated on two consecutive annual tests. [District Rule 1070]
17. If permittee fails any compliance demonstration for PM10 and VOC emission limits when testing not less than once every 36 months, compliance with PM10 and VOC emission limits shall be demonstrated not less than once every 12 months. [District Rule 1070]
18. 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
19. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1070]
20. The APCO or authorized representative shall have the authority to require mitigation of toxic emissions if total facility health risks are determined to be significant pursuant to Air Toxics "Hot Spot" Information and Assessment Act of 1987. [District Rule 2201] Federally Enforceable Through Title V Permit
21. Monsanto Enviro-Chem Systems, Inc. model EEE high velocity air filter FCS-1 shall be equipped with a differential pressure monitor to continuously indicate and record the pressure drop across the filter media. [40 CFR 64.3] Federally Enforceable Through Title V Permit
22. Monsanto Enviro-Chem Systems, Inc. model EEE high velocity air filter FCS-1 shall operate with a minimum differential pressure of 0 inches water column and a maximum differential pressure of 27 inches water column. These parameters shall be reviewed annually and revised if necessary based on PM10 source test result data, historical operating data and manufacturer/supplier recommendations. [40 CFR 64.3] Federally Enforceable Through Title V Permit
23. During each day of operation, the permittee shall record the differential pressure of the Monsanto Enviro-Chem Systems, Inc. model EEE high velocity air filter FCS-1 and compare the readings with the permitted range. If the baghouses' differential pressure falls outside the permitted range, the permittee shall take all necessary steps to return the baghouses' differential pressure to within the permitted range as soon as possible, but no longer than three hours after detection. If the differential pressure cannot be returned within the permitted range after three hours of operation following detection, the permittee shall shut the operation down and make all necessary repairs to bring the differential pressure back to within the permitted range. [40 CFR Part 64] Federally Enforceable Through Title V Permit
24. Fabric collection system of Monsanto Enviro-Chem Systems, Inc. model EEE high velocity air filter FCS-1 shall be completely inspected annually while in operation for evidence of particulate matter breakthrough and shall be repaired as needed. [District Rule 2201] Federally Enforceable Through Title V Permit
25. Monsanto Enviro-Chem Systems, Inc. model EEE high velocity air filter FCS-1 shall be completely inspected annually while not in operation for tears, scuffs, abrasives or holes which might interfere with PM collection efficiency and shall be replaced as needed. [District Rule 2201] Federally Enforceable Through Title V Permit
26. Visible emissions from Monsanto Enviro-Chem Systems, Inc. model EEE high velocity air filter FCS-1 shall be evaluated using EPA Method 22 for a period of at least 6 minutes at least once per each week 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 collection 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. [40 CFR 64] Federally Enforceable Through Title V Permit

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PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

27. The industry is exempted from the quarterly reports required under 40 CFR 60.7. During performance testing, the operating temperature of the high velocity air filters shall be recorded and reported as required by 40 CFR 60.7 (d). Facility shall maintain a file of temperature monitoring results for at least 5 years. [40 CFR 60.473] Federally Enforceable Through Title V Permit
28. For saturators, performance tests required under 40 CFR 60.8 shall be conducted using procedures in 40 CFR 60.474 (a)-(c). [40 CFR 60.474] Federally Enforceable Through Title V Permit
29. Method 9 and the procedures in 40 CFR 60.11 shall be used to measure opacity. [40 CFR 60.474] Federally Enforceable Through Title V Permit
30. The administrator shall determine compliance with the standards in CFR 60.472 (a)(3) by using Method 22, modified so that readings are recorded every 15 seconds for a period of consecutive observations during representative conditions (in accordance with 40 CFR 60.8 (c) totalling 60 minutes. A performance test shall consist of one run. [40 CFR 60.474] Federally Enforceable Through Title V Permit
31. The owner and operator shall use the monitoring device in 60.473 (a) to monitor and record continuously the temperature during the particulate matter run and shall report the results to the Administrator with the performance test results. [40 CFR 60.474] Federally Enforceable Through Title V Permit
32. Records of Monsanto Enviro-Chem Systems, Inc. model EEE high velocity air filter FCS-1 maintenance, inspection, and repairs shall be maintained. The records shall include identification of equipment, date of inspection, corrective action taken, and identification of individual performing inspection. [District Rule 1070]
33. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR 64.9] Federally Enforceable Through Title V Permit
34. Permittee shall maintain daily records of asphalt process rate and temperature monitoring results, and shall make such records readily available for District inspection upon request for a period of five years. [District Rule 1070]

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

DRAFT

ATTACHMENT B

Authorities to Construct

AUTHORITY TO CONSTRUCT

PERMIT NO: S-2033-9-9

ISSUANCE DATE: 01/04/2012

LEGAL OWNER OR OPERATOR: ELK CORPORATION OF TEXAS
MAILING ADDRESS: 6200 ZERKER RD
SHAFTER, CA 93263

LOCATION: 6200 ZERKER RD
SHAFTER, CA 93263

SECTION: 15 TOWNSHIP: 28S RANGE: 26E

EQUIPMENT DESCRIPTION:

MODIFICATION OF AN ASPHALT ROOFING SHINGLE MANUFACTURING OPERATION INCLUDING UNWIND STAND, DRY FELT LOOPER SERVED BY DUST COLLECTOR (DC-4) ULTRA INDUSTRIES MODEL BD 400-120 III; DISTRIBUTION HOPPER, CONVEYORS, BUCKET ELEVATORS, DISTRIBUTOR, BACK SURFACING/GRANULES APPLICATOR, SERVED BY DUST COLLECTOR DC-5 (LISTED ON S-2033-8); BACK SURFACING FINES HOPPER SERVED BY DUST COLLECTOR (DC-6) ULTRA INDUSTRIES MODEL BBX 6-58-IIG; COOLING DRUMS AND FINISHED PRODUCT LOOPER: ADD USE BINS SERVED BY DUST COLLECTOR DC-5

CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. All equipment shall be constructed, maintained and operated according to the specifications and plans contained in the permit application except as otherwise specified herein. [District Rule 2201]
3. The APCO or any authorized representative, upon request, shall have access to inspect any equipment, operation, or method required in this permit, and to sample emissions from the source or require samples to be taken. [District Rule 1081]
4. Dust collectors shall be maintained and operated according to manufacturers' recommendations. [District Rule 2201]
5. All conveyors and bucket elevators shall be enclosed. [District Rule 2201]
6. There shall be no visible emissions greater than 5% opacity from cooling drums, finished product looper, and exhaust gas of dust collectors. [District Rule 2201]

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

DAVID WARNER, Director of Permit Services

S-2033-9-9: Jun 25 2013 12:52PM -- EDGEHLR : Joint Inspection NOT Required

Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308 • (661) 392-5500 • Fax (661) 392-5585

7. There shall be no visible emissions greater than 0% opacity from mineral conveying, handling, and storage. [District Rule 2201]
8. Visible emissions from dust collectors DC-4, DC-5, and DC-6 serving the asphalt roofing shingle manufacturing operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District NSR Rule]
9. Maximum particulate matter (PM10) emission rate from dust collector DC-4 shall not exceed 0.02 lb per ton of glass mat processed. [District Rule 2201]
10. Maximum particulate matter (PM10) emission rate from dust collector DC-5 shall not exceed 0.0002 lb per ton of asphalt roofing shingle produced plus 0.00027 lb per ton of filler material processed by the filler heating operation, when in use. [District Rule 2201]
11. Maximum particulate matter (PM10) emission rate from dust collector DC-6 shall not exceed 0.00027 lb per ton of back surfacing fines processed. [District Rule 2201]
12. Compliance source testing with PM10 emission rate(s) shall be demonstrated within 60 days upon detection of visible emissions greater than 5% opacity from the dust collector(s) exhaust. [District Rule 1070]
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]
14. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
15. Total facility shingle production rate shall not exceed 3998 tons/day, glass mat process rate shall not exceed 80 tons/day, and back surfacing fines process rate shall not exceed 300 tons/day without prior District approval. [District Rule 2201]
16. The APCO or authorized representative shall have the authority to require mitigation of toxic emissions if total facility health risks are determined to be significant pursuant to Air Toxics "Hot Spot" Information and Assessment Act of 1987. [District Rule 2201]
17. Permittee shall comply with all applicable requirements, including notification and reporting requirements of NSPS Rule 4001 (40 CFR 60 Subpart UU). [District Rule 4001]
18. Permittee shall maintain accurate daily records of shingle production rate and glass mat & back surfacing fines process rates, and such records shall be made readily available for District inspection upon request for a period of five years. [District Rule 1070]

AUTHORITY TO CONSTRUCT

PERMIT NO: S-2033-9-10

ISSUANCE DATE: 08/02/2012

LEGAL OWNER OR OPERATOR: ELK CORPORATION OF TEXAS

MAILING ADDRESS: 6200 ZERKER RD
SHAFTER, CA 93263

LOCATION: 6200 ZERKER RD
SHAFTER, CA 93263

SECTION: 15 TOWNSHIP: 28S RANGE: 26E

EQUIPMENT DESCRIPTION:

MODIFICATION OF AN ASPHALT ROOFING SHINGLE MANUFACTURING OPERATION INCLUDING UNWIND STAND, DRY FELT LOOPER SERVED BY DUST COLLECTOR (DC-4) ULTRA INDUSTRIES MODEL BD 400-120 III; DISTRIBUTION HOPPER, CONVEYORS, BUCKET ELEVATORS, DISTRIBUTOR, BACK SURFACING/GRANULES APPLICATOR, SERVED BY DUST COLLECTOR DC-5 (LISTED ON S-2033-8); BACK SURFACING FINES HOPPER SERVED BY DUST COLLECTOR (DC-6) ULTRA INDUSTRIES MODEL BBX 6-58-IIG; COOLING DRUMS AND FINISHED PRODUCT LOOPER: INSTALL PIPING TO COMBINE MATERIAL FROM BACK-SURFACING FINES HOPPER (VENTED TO DC-6) AND USE BIN THROUGH METERING DEVICE FOR CONVEYANCE TO NEW BACK SURFACE APPLICATION POINT IN S-2033-12

CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. All equipment shall be constructed, maintained and operated according to the specifications and plans contained in the permit application except as otherwise specified herein. [District Rule 2201]
3. The APCO or any authorized representative, upon request, shall have access to inspect any equipment, operation, or method required in this permit, and to sample emissions from the source or require samples to be taken. [District Rule 1081]
4. Dust collectors shall be maintained and operated according to manufacturers' recommendations. [District Rule 2201]
5. All conveyors and bucket elevators shall be enclosed. [District Rule 2201]
6. There shall be no visible emissions greater than 5% opacity from cooling drums, finished product looper, and exhaust gas of dust collectors. [District Rule 2201]

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

DAVID WARNER, Director of Permit Services

S-2033-9-10 : Jun 25 2013 12:53PM - EDGEHILR : Joint Inspection NOT Required

7. There shall be no visible emissions greater than 0% opacity from mineral conveying, handling, and storage. [District Rule 2201]
8. Visible emissions from dust collectors DC-4, DC-5, and DC-6 serving the asphalt roofing shingle manufacturing operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District NSR Rule]
9. Maximum particulate matter (PM10) emission rate from dust collector DC-4 shall not exceed 0.02 lb per ton of glass mat processed. [District Rule 2201]
10. Maximum particulate matter (PM10) emission rate from dust collector DC-5 shall not exceed 0.0002 lb per ton of asphalt roofing shingle produced plus 0.00027 lb per ton of filler material processed by the filler heating operation, when in use. [District Rule 2201]
11. Maximum particulate matter (PM10) emission rate from dust collector DC-6 shall not exceed 0.00027 lb per ton of back surfacing fines processed. [District Rule 2201]
12. Compliance source testing with PM10 emission rate(s) shall be demonstrated within 60 days upon detection of visible emissions greater than 5% opacity from the dust collector(s) exhaust. [District Rule 1070]
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]
14. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081]
15. Total facility shingle production rate shall not exceed 3998 tons/day, glass mat process rate shall not exceed 80 tons/day, and back surfacing fines process rate shall not exceed 300 tons/day without prior District approval. [District Rule 2201]
16. The APCO or authorized representative shall have the authority to require mitigation of toxic emissions if total facility health risks are determined to be significant pursuant to Air Toxics "Hot Spot" Information and Assessment Act of 1987. [District Rule 2201]
17. Permittee shall comply with all applicable requirements, including notification and reporting requirements of NSPS Rule 4001 (40 CFR 60 Subpart UU). [District Rule 4001]
18. Permittee shall maintain accurate daily records of shingle production rate and glass mat & back surfacing fines process rates, and such records shall be made readily available for District inspection upon request for a period of five years. [District Rule 1070]
19. ATC shall be implemented concurrently with ATC S-2033-12-7. [District Rule 2201]

AUTHORITY TO CONSTRUCT

PERMIT NO: S-2033-12-7

ISSUANCE DATE: 08/02/2012

LEGAL OWNER OR OPERATOR: ELK CORPORATION OF TEXAS

MAILING ADDRESS: 6200 ZERKER RD
SHAFTER, CA 93263

LOCATION: 6200 ZERKER RD
SHAFTER, CA 93263

SECTION: 15 TOWNSHIP: 28S RANGE: 26E

EQUIPMENT DESCRIPTION:

MODIFICATION OF ASPHALT ROOFING SHINGLE COATING OPERATION WITH MACHINE LINE FUME COLLECTION SYSTEM VENTED TO HIGH VELOCITY AIR FILTER (FCS-1); INSTALL FINES APPLICATION POINT SERVED BY FCS-1 AIR FILTER

CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. All equipment shall be constructed, maintained and operated according to the specifications and plans contained in the permit application except as otherwise specified herein. [District Rule 2201]
3. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081]
4. Operation shall include Monsanto Enviro-Chem Systems, Inc. model EEE high velocity air filter FCS-1 with 200 hp exhaust blower. [District Rule 2201]
5. Operation shall include two continuous mixers, 4000 gallon surge tank with agitator, filled coating applicator, sealdown applicator with three 2000 gallon sealdown storage and mix tanks served by high velocity air filter FCS-1. [District Rule 2201]
6. Operation shall include laminator sealdown applicator, laminator adhesive applicator, and five 250 gallon use tanks served by high velocity air filter FCS-1. [District Rule 2201]
7. Operation shall include oil pump and 1000 gallon reclaim oil storage tank. [District Rule 2201]

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

DAVID WARNER, Director of Permit Services

S-2033-12-7 : Jun 25 2013 1:17PM -- EDGEHILR : Joint Inspection NOT Required

8. Continuous temperature monitoring equipment (with accuracy of +/- 15 degrees Celsius over its range) shall be installed at inlet of high velocity air filter. [District Rule 2201]
9. Continuous temperature monitoring results shall be maintained for District inspection upon request for at least five years. [District Rule 1070]
10. Each tank roof appurtenance shall be maintained leak-free (no reading in excess of 10,000 ppm as methane measured at a distance of one centimeter from the source). [District Rule 4623]
11. Maximum flow rate through high velocity air filter FCS-1 shall not exceed 25,200 acfm. Flow control damper shall be maintained at setting shown to demonstrate compliance with flow limit during source testing. [District Rule 2201]
12. Visible emissions shall not exceed 1/4 Ringelmann or 5% opacity. [District Rule 2201]
13. Emission rate from shingle coating operation shall not exceed: PM10: 0.88 lb/hr and 6638 lb/yr, and VOC: 5.04 lb/hr and 37,996 lb/yr. [District Rule 2201]
14. Total quantity of coating asphalt, sealant asphalt, and laminate adhesive asphalt introduced to asphalt roofing shingle coating operation (S-2033-12) shall not exceed 657 tons/day and 206,500 tons/yr. [District Rule 2201]
15. Source testing to demonstrate compliance with PM10 and VOC emission limits shall be conducted not less than once every 12 months, except as provided below. [District Rule 1070]
16. Source testing to demonstrate compliance with PM10 and VOC emission limits shall be conducted not less than once every 36 months if compliance is demonstrated on two consecutive annual tests. [District Rule 1070]
17. If permittee fails any compliance demonstration for PM10 and VOC emission limits when testing not less than once every 36 months, compliance with PM10 and VOC emission limits shall be demonstrated not less than once every 12 months. [District Rule 1070]
18. 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]
19. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1070]
20. The APCO or authorized representative shall have the authority to require mitigation of toxic emissions if total facility health risks are determined to be significant pursuant to Air Toxics "Hot Spot" Information and Assessment Act of 1987. [District Rule 2201]
21. Permittee shall comply with all applicable requirements, including notification and reporting requirements of NSPS Rule 4001 (40 CFR 60 Subpart UU). [District Rule 4001]
22. Permittee shall maintain daily records of asphalt process rate and temperature monitoring results, and shall make such records readily available for District inspection upon request for a period of five years. [District Rule 1070]
23. ATC shall be implemented concurrently with ATC S-2033-9-10. [District Rule 2201]

ATTACHMENT C

Permit Application

ATTACHMENT D

Previous Title V PTOs

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-2033-9-8

EXPIRATION DATE: 04/30/2017

SECTION: 15 **TOWNSHIP:** 28S **RANGE:** 26E

EQUIPMENT DESCRIPTION:

ASPHALT ROOFING SHINGLE MANUFACTURING OPERATION INCLUDING UNWIND STAND, DRY FELT LOOPER SERVED BY DUST COLLECTOR (DC-4) ULTRA INDUSTRIES MODEL BD 400-120 III; DISTRIBUTION HOPPER, CONVEYORS, BUCKET ELEVATORS, DISTRIBUTOR, BACK SURFACING/GRANULES APPLICATOR, SERVED BY DUST COLLECTOR DC-5 (LISTED ON S-2033-8); BACK SURFACING FINES HOPPER SERVED BY DUST COLLECTOR (DC-6) ULTRA INDUSTRIES MODEL BBX 6-58-IIG; COOLING DRUMS AND FINISHED PRODUCT LOOPER

PERMIT UNIT REQUIREMENTS

1. All equipment shall be constructed, maintained and operated according to the specifications and plans contained in the permit application except as otherwise specified herein. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Continuous temperature monitoring equipment (with accuracy of +/- 15 Celsius degrees (+/- 27 Fahrenheit degrees) over its range) shall be installed at inlet of high velocity air filters. [40 CFR 60.473] Federally Enforceable Through Title V Permit
3. The APCO or any authorized representative, upon request, shall have access to inspect any equipment, operation, or method required in this permit, and to sample emissions from the source or require samples to be taken. [District Rule 1081] Federally Enforceable Through Title V Permit
4. Dust collectors shall be maintained and operated according to manufacturers' recommendations. [District Rule 2201] Federally Enforceable Through Title V Permit
5. All conveyors and bucket elevators shall be enclosed. [District Rule 2201] Federally Enforceable Through Title V Permit
6. There shall be no visible emissions greater than 5% opacity from cooling drums, finished product looper, and exhaust gas of dust collectors. [District Rule 2201] Federally Enforceable Through Title V Permit
7. There shall be no visible emissions greater than 0% opacity from mineral conveying, handling, and storage. [District Rule 2201 and 40 CFR 60.472] Federally Enforceable Through Title V Permit
8. Visible emissions from dust collectors DC-4, DC-5, and DC-6 serving the asphalt roofing shingle manufacturing operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Particulate matter emissions shall not exceed 0.08 lb/ton of asphalt shingle produced. [40 CFR 60.472] Federally Enforceable Through Title V Permit
10. Maximum particulate matter (PM10) emission rate from dust collector DC-4 shall not exceed 0.02 lb per ton of glass mat processed. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Maximum particulate matter (PM10) emission rate from dust collector DC-5 shall not exceed 0.0002 lb per ton of asphalt roofing shingle produced plus 0.00027 lb per ton of filler material processed by the filler heating operation, when in use. [District Rule 2201] 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.

12. Maximum particulate matter (PM10) emission rate from dust collector DC-6 shall not exceed 0.00027 lb per ton of back surfacing fines processed. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Compliance source testing with PM10 emission rate(s) shall be demonstrated within 60 days upon detection of visible emissions greater than 5% opacity from the dust collector(s) exhaust. [District Rule 1070]
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 shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
16. Total facility shingle production rate shall not exceed 3998 tons/day, glass mat process rate shall not exceed 80 tons/day, and back surfacing fines process rate shall not exceed 300 tons/day without prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
17. The APCO or authorized representative shall have the authority to require mitigation of toxic emissions if total facility health risks are determined to be significant pursuant to Air Toxics "Hot Spot" Information and Assessment Act of 1987. [District Rule 2201] Federally Enforceable Through Title V Permit
18. DC-4 and DC-5 dust collectors shall be equipped with a differential pressure monitor to continuously indicate and record the pressure drop across the filter media. [40 CFR 64.3] Federally Enforceable Through Title V Permit
19. DC-4 and DC-5 dust collectors shall operate with a minimum differential pressure of 0 inches water column and a maximum differential pressure of 15 inches water column. These parameters shall be reviewed annually and revised if necessary based on PM10 source test result data, historical operating data and manufacturer/supplier recommendations. [40 CFR 64.3] Federally Enforceable Through Title V Permit
20. During each day of operation, the permittee shall record the differential pressure of DC-4 and DC-5 dust collectors and compare the readings with the permitted range. If the baghouses' differential pressure falls outside the permitted range, the permittee shall take all necessary steps to return the baghouses' differential pressure to within the permitted range as soon as possible, but no longer than three hours after detection. If the differential pressure cannot be returned within the permitted range after three hours of operation following detection, the permittee shall shut the operation down and make all necessary repairs to bring the differential pressure back to within the permitted range. [40 CFR Part 64] Federally Enforceable Through Title V Permit
21. 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 part 64.8. [40 CFR 64.8] Federally Enforceable Through Title V Permit
22. Fabric collection system of DC-4, DC-5, and DC-6 dust collectors shall be completely inspected annually while in operation for evidence of particulate matter breakthrough and shall be repaired as needed. [District Rule 2201] Federally Enforceable Through Title V Permit
23. DC-4, DC-5, and DC-6 dust collectors filters shall be completely inspected annually while not in operation for tears, scuffs, abrasives or holes which might interfere with PM collection efficiency and shall be replaced as needed. [District Rule 2201] Federally Enforceable Through Title V Permit
24. Visible emissions from DC-4 and DC-5 dust collectors shall be evaluated using EPA Method 22 for a period of at least 6 minutes at least once per each week 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 collection 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. [40 CFR 64] Federally Enforceable Through Title V Permit
25. The industry is exempted from the quarterly reports required under 40 CFR 60.7. During performance testing, the operating temperature of the high velocity air filters shall be recorded and reported as required by 40 CFR 60.7 (d). Facility shall maintain a file of temperature monitoring results for at least 5 years. [40 CFR 60.473] 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.

26. For saturators, performance tests required under 40 CFR 60.8 shall be conducted using procedures in 40 CFR 60.474 (a)-(c). [40 CFR 60.474] Federally Enforceable Through Title V Permit
27. Method 9 and the procedures in 40 CFR 60.11 shall be used to measure opacity. [40 CFR 60.474] Federally Enforceable Through Title V Permit
28. The administrator shall determine compliance with the standards in CFR 60.472 (a)(3) by using Method 22, modified so that readings are recorded every 15 seconds for a period of consecutive observations during representative conditions (in accordance with 40 CFR 60.8 (c) totalling 60 minutes. A performance test shall consist of one run. [40 CFR 60.474] Federally Enforceable Through Title V Permit
29. The owner and operator shall use the monitoring device in 60.473 (a) to monitor and record continuously the temperature during the particulate matter run and shall report the results to the Administrator with the performance test results. [40 CFR 60.474] Federally Enforceable Through Title V Permit
30. Records of DC-4 and DC-5 dust collectors filter maintenance, inspection, and repairs shall be maintained. The records shall include identification of equipment, date of inspection, corrective action taken, and identification of individual performing inspection. [District Rule 1070]
31. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR 64.9] Federally Enforceable Through Title V Permit
32. Permittee shall maintain accurate daily records of shingle production rate and glass mat & back surfacing fines process rates, and such records shall be made readily available for District inspection upon request for a period of five years. [District Rule 1070]

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-2033-10-5

EXPIRATION DATE: 04/30/2017

EQUIPMENT DESCRIPTION:

ASPHALT RECEIVING AND STORAGE OPERATION INCLUDING ONE 20,000 GALLON RECEIVING TANK, TWO 16,000 GALLON STORAGE TANKS, AND THREE 90,000 GALLON STORAGE TANKS

PERMIT UNIT REQUIREMENTS

1. All equipment shall be constructed, maintained and operated according to the specifications and plans contained in the permit application except as otherwise specified herein. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The APCO or any authorized representative, upon request, shall have access to inspect any equipment, operation, or method required in this permit, and to sample emissions from the source or require samples to be taken. [District Rule 1081] Federally Enforceable Through Title V Permit
3. Operation shall include Monsanto Enviro-Chem Systems, Inc. model AVP-1000 high velocity air filter FCS-2 with 10 hp exhaust blower, serving asphalt receiving/storage tanks. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Visible emissions shall not exceed 0% opacity except for one consecutive 15-minute period in any 24-hour period when clearing transfer lines. [District Rule 2201 and 40 CFR 60.472] Federally Enforceable Through Title V Permit
5. Continuous temperature monitoring equipment (with accuracy of +/- 15 degrees Celsius over its range) shall be installed at inlet of high velocity air filter. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Tank roof appurtenances shall be maintained leak-free, as defined in Rule 4623. [District Rule 4623] Federally Enforceable Through Title V Permit
7. Maximum particulate matter (PM10) emission rate from high velocity air filter FCS-2 shall not exceed 1.23 lb/hr. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Maximum volatile organic compounds (VOC) emission rate from high velocity air filter FCS-2 shall not exceed 1.23 lb/hr. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Total facility asphalt received shall not exceed 919 tons/day without prior District approval. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The APCO or authorized representative shall have the authority to require mitigation of toxic emissions if total facility health risks are determined to be significant pursuant to Air Toxics "Hot Spot" Information and Assessment Act of 1987. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Monsanto Enviro-Chem Systems, Inc. model AVP-1000 high velocity air filter FCS-2 dust collector shall be equipped with a differential pressure monitor to continuously indicate and record the pressure drop across the filter media. [40 CFR 64.3] Federally Enforceable Through Title V Permit
12. Monsanto Enviro-Chem Systems, Inc. model AVP-1000 high velocity air filter FCS-2 dust collector shall operate with a minimum differential pressure of 0 inches water column and a maximum differential pressure of 27 inches water column. These parameters shall be reviewed annually and revised if necessary based on PM10 source test result data, historical operating data and manufacturer/supplier recommendations. [40 CFR 64.3] 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. During each day of operation, the permittee shall record the differential pressure of the Monsanto Enviro-Chem Systems, Inc. model AVP-1000 high velocity air filter FCS-2 dust collector and compare the readings with the permitted range. If the baghouses' differential pressure falls outside the permitted range, the permittee shall take all necessary steps to return the baghouses' differential pressure to within the permitted range as soon as possible, but no longer than three hours after detection. If the differential pressure cannot be returned within the permitted range after three hours of operation following detection, the permittee shall shut the operation down and make all necessary repairs to bring the differential pressure back to within the permitted range. [40 CFR Part 64] Federally Enforceable Through Title V Permit
14. Fabric collection system of Monsanto Enviro-Chem Systems, Inc. model AVP-1000 high velocity air filter FCS-2 dust collector shall be completely inspected annually while in operation for evidence of particulate matter breakthrough and shall be repaired as needed. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Monsanto Enviro-Chem Systems, Inc. model AVP-1000 high velocity air filter FCS-2 dust collector filters shall be completely inspected annually while not in operation for tears, scuffs, abrasives or holes which might interfere with PM collection efficiency and shall be replaced as needed. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Visible emissions from Monsanto Enviro-Chem Systems, Inc. model AVP-1000 high velocity air filter FCS-2 dust collector shall be evaluated using EPA Method 22 for a period of at least 6 minutes at least once per each week 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 collection 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. [40 CFR 64] Federally Enforceable Through Title V Permit
17. Method 9 and the procedures in 40 CFR 60.11 shall be used to measure opacity. [40 CFR 60.474] Federally Enforceable Through Title V Permit
18. Records of Monsanto Enviro-Chem Systems, Inc. model AVP-1000 high velocity air filter FCS-2 dust collector filter maintenance, inspection, and repairs shall be maintained. The records shall include identification of equipment, date of inspection, corrective action taken, and identification of individual performing inspection. [District Rule 1070]
19. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR 64.9] Federally Enforceable Through Title V Permit
20. Permittee shall maintain accurate daily records of facility asphalt received and temperature monitoring results, and shall make such records readily available for District inspection upon request for a period of five years. [District Rule 1070]

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San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-2033-12-6

EXPIRATION DATE: 04/30/2017

SECTION: 15 **TOWNSHIP:** 28S **RANGE:** 26E

EQUIPMENT DESCRIPTION:

ASPHALT ROOFING SHINGLE COATING OPERATION WITH MACHINE LINE FUME COLLECTION SYSTEM VENTED TO HIGH VELOCITY AIR FILTER (FCS-1)

PERMIT UNIT REQUIREMENTS

1. All equipment shall be constructed, maintained and operated according to the specifications and plans contained in the permit application except as otherwise specified herein. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Sampling facilities for source testing shall be provided in accordance with the provisions of Rule 1081 (Source Sampling). [District Rule 1081] Federally Enforceable Through Title V Permit
3. Operation shall include Monsanto Enviro-Chem Systems, Inc. model EEE high velocity air filter FCS-1 with 200 hp exhaust blower. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Operation shall include two continuous mixers, 4000 gallon surge tank with agitator, filled coating applicator, sealdown applicator with three 2000 gallon sealdown storage and mix tanks served by high velocity air filter FCS-1. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Operation shall include laminator sealdown applicator, laminator adhesive applicator, and five 250 gallon use tanks served by high velocity air filter FCS-1. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Operation shall include oil pump and 1000 gallon reclaim oil storage tank. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Continuous temperature monitoring equipment (with accuracy of +/- 15 degrees Celsius over its range) shall be installed at inlet of high velocity air filter. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Continuous temperature monitoring results shall be maintained for District inspection upon request for at least five years. [District Rule 1070]
9. Each tank roof appurtenance shall be maintained leak-free (no reading in excess of 10,000 ppm as methane measured at a distance of one centimeter from the source). [District Rule 4623] Federally Enforceable Through Title V Permit
10. Maximum flow rate through high velocity air filter FCS-1 shall not exceed 25,200 acfm. Flow control damper shall be maintained at setting shown to demonstrate compliance with flow limit during source testing. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Visible emissions shall not exceed 1/4 Ringelmann or 5% opacity. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Particulate matter emissions shall not exceed 0.08 lb/ton of asphalt shingle produced. [40 CFR 60.472] Federally Enforceable Through Title V Permit
13. Emission rate from shingle coating operation shall not exceed: PM10: 0.88 lb/hr and 6638 lb/yr, and VOC: 5.04 lb/hr and 37,996 lb/yr. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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14. Total quantity of coating asphalt, sealant asphalt, and laminate adhesive asphalt introduced to asphalt roofing shingle coating operation (S-2033-12) shall not exceed 657 tons/day and 206,500 tons/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Source testing to demonstrate compliance with PM10 and VOC emission limits shall be conducted not less than once every 12 months, except as provided below. [District Rule 1070]
16. Source testing to demonstrate compliance with PM10 and VOC emission limits shall be conducted not less than once every 36 months if compliance is demonstrated on two consecutive annual tests. [District Rule 1070]
17. If permittee fails any compliance demonstration for PM10 and VOC emission limits when testing not less than once every 36 months, compliance with PM10 and VOC emission limits shall be demonstrated not less than once every 12 months. [District Rule 1070]
18. 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
19. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1070]
20. The APCO or authorized representative shall have the authority to require mitigation of toxic emissions if total facility health risks are determined to be significant pursuant to Air Toxics "Hot Spot" Information and Assessment Act of 1987. [District Rule 2201] Federally Enforceable Through Title V Permit
21. Monsanto Enviro-Chem Systems, Inc. model EEE high velocity air filter FCS-1 dust collector shall be equipped with a differential pressure monitor to continuously indicate and record the pressure drop across the filter media. [40 CFR 64.3] Federally Enforceable Through Title V Permit
22. Monsanto Enviro-Chem Systems, Inc. model EEE high velocity air filter FCS-1 dust collector shall operate with a minimum differential pressure of 0 inches water column and a maximum differential pressure of 27 inches water column. These parameters shall be reviewed annually and revised if necessary based on PM10 source test result data, historical operating data and manufacturer/supplier recommendations. [40 CFR 64.3] Federally Enforceable Through Title V Permit
23. During each day of operation, the permittee shall record the differential pressure of the Monsanto Enviro-Chem Systems, Inc. model EEE high velocity air filter FCS-1 dust collector and compare the readings with the permitted range. If the baghouses' differential pressure falls outside the permitted range, the permittee shall take all necessary steps to return the baghouses' differential pressure to within the permitted range as soon as possible, but no longer than three hours after detection. If the differential pressure cannot be returned within the permitted range after three hours of operation following detection, the permittee shall shut the operation down and make all necessary repairs to bring the differential pressure back to within the permitted range. [40 CFR Part 64] Federally Enforceable Through Title V Permit
24. Fabric collection system of Monsanto Enviro-Chem Systems, Inc. model EEE high velocity air filter FCS-1 dust collector shall be completely inspected annually while in operation for evidence of particulate matter breakthrough and shall be repaired as needed. [District Rule 2201] Federally Enforceable Through Title V Permit
25. Monsanto Enviro-Chem Systems, Inc. model EEE high velocity air filter FCS-1 dust collector filters shall be completely inspected annually while not in operation for tears, scuffs, abrasives or holes which might interfere with PM collection efficiency and shall be replaced as needed. [District Rule 2201] Federally Enforceable Through Title V Permit
26. Visible emissions from Monsanto Enviro-Chem Systems, Inc. model EEE high velocity air filter FCS-1 dust collector shall be evaluated using EPA Method 22 for a period of at least 6 minutes at least once per each week 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 collection 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. [40 CFR 64] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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27. The industry is exempted from the quarterly reports required under 40 CFR 60.7. During performance testing, the operating temperature of the high velocity air filters shall be recorded and reported as required by 40 CFR 60.7 (d). Facility shall maintain a file of temperature monitoring results for at least 5 years. [40 CFR 60.473] Federally Enforceable Through Title V Permit
28. For saturators, performance tests required under 40 CFR 60.8 shall be conducted using procedures in 40 CFR 60.474 (a)-(c). [40 CFR 60.474] Federally Enforceable Through Title V Permit
29. Method 9 and the procedures in 40 CFR 60.11 shall be used to measure opacity. [40 CFR 60.474] Federally Enforceable Through Title V Permit
30. The administrator shall determine compliance with the standards in CFR 60.472 (a)(3) by using Method 22, modified so that readings are recorded every 15 seconds for a period of consecutive observations during representative conditions (in accordance with 40 CFR 60.8 (c) totalling 60 minutes. A performance test shall consist of one run. [40 CFR 60.474] Federally Enforceable Through Title V Permit
31. The owner and operator shall use the monitoring device in 60.473 (a) to monitor and record continuously the temperature during the particulate matter run and shall report the results to the Administrator with the performance test results. [40 CFR 60.474] Federally Enforceable Through Title V Permit
32. Records of Monsanto Enviro-Chem Systems, Inc. model EEE high velocity air filter FCS-1 dust collector filter maintenance, inspection, and repairs shall be maintained. The records shall include identification of equipment, date of inspection, corrective action taken, and identification of individual performing inspection. [District Rule 1070]
33. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR 64.9] Federally Enforceable Through Title V Permit
34. Permittee shall maintain daily records of asphalt process rate and temperature monitoring results, and shall make such records readily available for District inspection upon request for a period of five years. [District Rule 1070]

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