



JUL 14 2016

Mr. Anthony Cordova  
South Kern Industrial Center, LLC  
2653 Santiago Road  
Taft, CA 93268

**Re: Notice of Preliminary Decision – Title V Permit Renewal  
District Facility # S-4212  
Project # S-1151124**

Dear Mr. Cordova:

Enclosed for your review and comment is the District's analysis of the application to renew the Federally Mandated Operating Permit for South Kern Industrial Center, LLC at 2653 Santiago Road in Taft, California.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. After addressing all comments made during the 30-day public notice and the 45-day EPA comment periods, the District intends to issue the renewed Federally Mandated Operating Permit. Please submit your written comments on this project within the 30-day public comment period, as specified in the enclosed public notice.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura, Permit Services Manager, at (661) 392-5500.

Sincerely,

*Ed Vig*  
for Arnaud Marjollet  
Director of Permit Services

Enclosures

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

**Seyed Sadredin**  
Executive Director/Air Pollution Control Officer

**Northern Region**  
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# SAN JOAQUIN VALLEY AIR POLLUTION CONTROL DISTRICT

Proposed Title V Permit Renewal Evaluation  
South Kern Industrial Center, LLC  
S-4212

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**TITLE V PERMIT RENEWAL EVALUATION**  
**Composting Operation**

**Engineer:** Robert Rinaldi  
**Date:** June 23, 2016

**Facility Number:** S-4212  
**Facility Name:** South Kern Industrial Center, LLC  
**Mailing Address:** 2653 Santiago Road  
Taft, CA 93268

**Contact Name:** Anthony Cordova  
**Phone:** (661) 765-2200

**Responsible Official:** Anthony Cordova  
**Title:** Plant Manager

**Project # :** S-1151124  
**Deemed Complete:** March 19, 2015

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**I. PROPOSAL**

South Kern Industrial Center, LLC (SKIC) was issued a Title V permit on January 31, 2012. As required by District Rule 2520, the applicant is requesting a permit renewal. The existing Title V permit shall be reviewed and modified to reflect all applicable District and federal rules updated, removed, or added since the issuance of the initial Title V permit.

The purpose of this evaluation is to provide the legal and factual basis for all updated applicable requirements and to determine if the facility will comply with these updated requirements. It also specifically identifies all additions, deletions, and/or changes made to permit conditions or equipment descriptions. This review will span from 1/31/2012 to the present.

**II. FACILITY LOCATION**

SKIC is located at 2653 Santiago Road in Taft, CA.

### III. EQUIPMENT LISTING

A detailed facility printout listing all permitted equipment at the facility is included as Attachment C. The following permits were cancelled since the initial Title V permitting action on 1/31/2012, including S-4212-3-2, '-5-1, '-6-0 and '-7-1.

### IV. GENERAL PERMIT TEMPLATE USAGE

The applicant is requesting to use the following model general permit Templates:

#### A. Template SJV-UM-0-3 Facility Wide Umbrella

The applicant has requested to utilize template No. SJV-UM-0-3, Facility Wide Umbrella. Based on the information submitted in the Template Qualification Form, the applicant qualifies for the use of this template.

### V. SCOPE OF EPA AND PUBLIC REVIEW

Certain segments of the proposed Renewed Operating Permit are based on model general permit templates that have been previously subject to EPA and public review. The terms and conditions from the model general permit templates are included in the proposed permit and are not subject to further EPA and public review.

For permit applications utilizing model general permit templates, public and agency comments on the District's proposed actions are limited to the applicant's eligibility for model general permit template, applicable requirements not covered by the model general permit template, and the applicable procedural requirements for issuance of Title V Operating Permits.

The following permit conditions, including their underlying applicable requirements, originate from model general permit templates and are not subject to further EPA or public review.

Conditions 1 through 40 of the requirements for permit S-4212-0-1.

## VI. FEDERALLY ENFORCEABLE REQUIREMENTS

### C. Rules updated during this current renewal review interval (1/31/2012 to present)

- District Rule 2020, Exemptions (amended December 20, 2007 ⇒ amended December 18, 2014)
- District Rule 2201, New and Modified Stationary Source Review Rule (amended May 21, 2011 ⇒ February 18, 2016)
- District Rule 2410, Prevention of Significant Deterioration (became effective on November 26, 2012)
- District Rule 4702, Internal Combustion Engines – Phase 2 (amended January 18, 2007 ⇒ November 14, 2013)
- 40 CFR Part 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (amended January 30, 2013)
- 40 CFR Part 63, Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (amended March 6, 2013)
- 40 CFR Part 82, Subpart B, Stratospheric Ozone (amended June 25, 2013)
- 40 CFR Part 82, Subpart F, Stratospheric Ozone (amended June 25, 2013)

### D. Rules removed during this current renewal review interval (1/31/2012 to present)

- None

### E. Rules added during this current renewal review interval (1/31/2012 to present)

- District Rule 2410, Prevention of Significant Deterioration (adopted June 16, 2011, effective November 26, 2012)

**F. Rules not updated during this current renewal review interval (1/31/2012 to present)**

- District Rule 1070, Inspections (amended December 17, 1992)
- District Rule 1080, Stack Monitoring (amended December 17, 1992)
- District Rule 1081, Source Sampling (amended December 16, 1993)
- District Rule 1100, Equipment Breakdown (amended December 17, 1992)
- District Rule 1160, Emission Statements (adopted November 18, 1992)
- District Rule 2010, Permits Required (amended December 17, 1992)
- District Rule 2031, Transfer of Permits (amended December 17, 1992)
- District Rule 2040, Applications (amended December 17, 1992)
- District Rule 2070, Standards for Granting Applications (amended December 17, 1992)
- District Rule 2080, Conditional Approval (amended December 17, 1992)
- District Rule 2520, Federally Mandated Operating Permits (amended June 21, 2001)
- District Rule 4101, Visible Emissions (amended February 17, 2005)
- District Rule 4102, Nuisance (amended December 17, 1992)
- District Rule 4201, Particulate Matter Concentration (amended December 17, 1992)
- District Rule 4202, Particulate Matter - Emission Rate (amended December 17, 1992)
- District Rule 4565, Biosolids, Animal Manure and Poultry Litter Operations (adopted March 15, 2007)
- District Rule 4601, Architectural Coatings (amended December 17, 2009)
- District Rule 4701, Internal Combustion Engines – Phase I (amended August 21, 2003)

- District Rule 4801, Sulfur Compounds (amended December 17, 1992)
- District Rule 8011 - General Requirements (amended August 19, 2004)
- District Rule 8021 - Construction, Demolition, Excavation, Extraction, and Other Earthmoving Activities (amended August 19, 2004)
- District Rule 8031 - Bulk Materials (amended August 19, 2004)
- District Rule 8041 - Carryout and Trackout (amended August 19, 2004)
- District Rule 8051 - Open Areas (amended August 19, 2004)
- District Rule 8061 - Paved and Unpaved Roads (amended August 19, 2004)
- 40 CFR Part 60, Subpart IIII, Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (amended July 11, 2006)
- 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos (amended September 18, 2003)
- 40 CFR Part 64, Compliance Assurance Monitoring (CAM) (amended October 10, 1997)
- 40 CFR Part 68, Chemical Accident Prevention Provisions (amended April 9, 2004)

## VII. REQUIREMENTS NOT FEDERALLY ENFORCEABLE

For each Title V source, the District issues a single permit that contains the Federally Enforceable requirements, as well as the District-only requirements. The District-only requirements are not a part of the Title V Operating Permits. The terms and conditions that are part of the facility's Title V permit are designated as "Federally Enforceable Through Title V Permit".

For this facility, the following are not federally enforceable and will not be discussed in further detail:

### A. Rules added during this current renewal review interval (1/31/2012 to present)

There are no new rules that are not federally enforceable being added at this time.

### B. Rules not updated during this current renewal review interval (1/31/2012 to present)

- District Rule 4102, Nuisance (as amended December 17, 1992)

For this facility, condition #41 of the facility wide requirements S-4212-0-2 is based on District Rule 4102 listed above and is not Federally Enforceable through Title V.

- Title 17, California Code of Regulations, Section 92000 through 92540

No changes were made to these rules since the renewed Title V permit was issued, therefore, they will not be discussed any further.

- Title 17, California Code of Regulations, Section 93115 Airborne Toxic Control Measure for Stationary Compression Ignition Engines

No changes were made to these rules since the renewed Title V permit was issued, therefore, they will not be discussed any further.

### C. Rules updated during this current renewal review interval (1/31/2012 to present)

There are no rules that are not federally enforceable being updated at this time.



## VIII. PERMIT REQUIREMENTS

The purpose of this evaluation is to review changes to federally enforceable requirements; therefore, this compliance section will only address rules that have been amended or added since the issuance of the initial Title V permit or most recent renewal of the Title V permit.

### A. District Rule 2020 - Exemptions

District Rule 2020 lists equipment which are specifically exempt from obtaining permits and specifies recordkeeping requirements to verify such exemptions. The amendments to this rule do not have any effect on current permit requirements and will therefore not be addressed in this evaluation.

### B. District Rule 2201 - New and Modified Stationary Source Review Rule

District Rule 2201 has been amended since this facility's initial Title V permit was issued. This Title V permit renewal does not constitute a modification per section 3.26, defined as an action including at least one of the following items:

- 1) Any change in hours of operation, production rate, or method of operation of an existing emissions unit, which would necessitate a change in permit conditions.
- 2) Any structural change or addition to an existing emissions unit which would necessitate a change in permit conditions. Routine replacement shall not be considered to be a structural change.
- 3) An increase in emissions from an emissions unit caused by a modification of the Stationary Source when the emissions unit is not subject to a daily emissions limitation.
- 4) Addition of any new emissions unit which is subject to District permitting requirements.
- 5) A change in a permit term or condition proposed by an applicant to obtain an exemption from an applicable requirement to which the source would otherwise be subject.

Therefore, the updated requirements of this rule are not applicable at this time.

**C. District Rule 2410 – Prevention of Significant Deterioration**

The prevention of significant deterioration (PSD) program is a construction permitting program for new major stationary sources and major modifications to existing major stationary sources located in areas classified as attainment or in areas that are unclassifiable for any criteria air pollutant. The provisions of this rule apply to any source and the owner or operator of any source subject to any requirement under Title 40 Code of Federal Regulations (40 CFR) Part 52.21 as incorporated into this rule.

The rule did not create new requirements, but merely transfers the authority for the 40 CFR Part 52.21 requirements to the District. Prior to adoption of this rule, that authority was vested with the USEPA. This action does not involve construction and thus does not trigger additional PSD requirements for this source. Therefore, the facility is not subject to this rule and no further discussion is required.

**D. District Rule 2520 - Federally Mandated Operating Permits**

**Greenhouse Gas Requirements**

There are no federally applicable Greenhouse Gas (GHG) requirements for this source. It should be noted that the Mandatory Greenhouse Gas Reporting rule (40CFR Part 98) is not included in the definition of an applicable requirement within Title V (per 40CFR 71.2). Therefore, there will be no further discussion of GHG in this evaluation.

**E. District Rule 4702 - Internal Combustion Engines**

Emergency standby IC engine S-4212-4 is only subject to administrative requirements of Rule 4702 which weren't revised in the latest amendment.

There are no changes to any of the existing Rule 4702 conditions.

**F. 40 CFR Part 60, Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines**

Subpart IIII requirements apply to stationary compression ignition internal combustion engines as specified. This regulation was adopted on 11 July 2006 and was last amended on 30 January 2013. This is a Federal rule; therefore, this rule is federally enforceable through Title V.

Subpart IIII requirements apply to stationary compression ignition internal combustion engines that commence construction after 11 June 2005.

There are no engines at the facility subject to the Subpart IIII requirements, since the 415 bhp diesel-fired engine powering an emergency generator was installed at the facility prior to 11 June 2005. This unit has not been modified or reconstructed since.

**G. 40 CFR 63 Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Emissions (RICE)**

Subpart ZZZZ establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations and operating limitations.

§6585(b) states, "A major source of HAP emissions is a plant site that emits or has the potential to emit any single HAP at a rate of 10 tons (9.07 megagrams) or more per year or any combination of HAP at a rate of 25 tons (22.68 megagrams) or more per year, except that for oil and gas production facilities, a major source of HAP emissions is determined for each surface site."

§6585(c) states, "An area source of HAP emissions is a source that is not a major source."

The facility is not a major source as defined in §6585(b). Therefore, this facility is an area source of HAP emissions.

§6590(a) states, "An affected source is any existing, new, or reconstructed stationary RICE located at a major or area source of HAP emissions, excluding stationary RICE being tested at a stationary RICE test cell/stand."

§6590(a)(1) defines the criteria for an existing stationary RICE as follows:

- (i) For stationary RICE with a site rating of more than 500 brake horsepower (HP) located at a major source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before December 19, 2002.
- (ii) For stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before June 12, 2006.
- (iii) For stationary RICE located at an area source of HAP emissions, a stationary RICE is existing if you commenced construction or reconstruction of the stationary RICE before June 12, 2006.
- (iv) A change in ownership of an existing stationary RICE does not make that stationary RICE a new or reconstructed stationary RICE.

This facility is an area source of HAP emissions. The engines at this facility have not commenced construction or reconstruction on or after June 12, 2006. Therefore, the engines at this facility meet the definition of an existing stationary RICE as defined in §6590(a)(1)(iii).

§6590(b)(3) states that the following engines do not have to meet the requirements of this subpart and of subpart A of this part:

- stationary RICE which is an existing spark ignition 4 stroke rich burn (4SRB) stationary RICE located at an area source,
- existing spark ignition 4SRB stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source, an existing spark ignition 2 stroke lean burn (2SLB) stationary RICE,
- existing spark ignition 4 stroke lean burn (4SLB) stationary RICE,
- existing compression ignition (CI) stationary RICE,
- existing emergency stationary RICE,
- existing limited use stationary RICE, or
- existing stationary RICE that combusts landfill gas or digester gas equivalent to 10 percent or more of the gross heat input on an annual basis

The engine at this facility is an existing emergency stationary RICEs and is an existing compression ignition (CI) stationary RICEs. Therefore, the engines do not

have to meet the requirements of this subpart and of subpart A of this part. No further discussion is required.

**H. 40 CFR Part 64, Compliance Assurance Monitoring (CAM)**

The USEPA 40 CFR Part 64 requirements apply to any pollutant specific emission unit (PSEU) at a major source that is required to obtain a Part 70 permit if the unit satisfies specified criteria. There are also exemptions available to the requirements as specified.

This regulation was adopted on 22 October 1997 and has not been amended since. This is a Federal rule; therefore, this rule is federally enforceable through Title V.

The CAM applicability review is included as Attachment D which was conducted for this facility's Initial Title V after the October 22, 1997 adoption date. Also, the existing permits have not been modified since the CAM applicability review. Only PTOs S-4212-3-2 and S-4212-5-1 have been cancelled since the CAM review. SKIC is in compliance with 40 CFR Part 64 requirements.

**I. 40 CFR Part 82, Subparts B and F, Stratospheric Ozone**

These regulations apply to servicing motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC). Sections of this regulation were amended in 2013, and condition 28 of S-4212-0-1 assure compliance with the requirements.

## **IX. PERMIT SHIELD**

A permit shield legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Title V permit. Compliance with the terms and conditions of the Operating Permit is considered compliance with all applicable requirements upon which those conditions are based, including those that have been subsumed.

### **A. Requirements Addressed by Model General Permit Templates**

#### **1. Model General Permit Template SJV-UM-0-1**

By submitting Model General Permit Template SJV-UM-0-1 qualification form, the applicant has requested that a permit shield be granted for all the applicable requirements identified by the template. Therefore, the permit shields as granted in Model General Permit Template is included as conditions 38 and 39 of the facility-wide requirements (S-4212-0-1).

## **X. PERMIT CONDITIONS**

See Attachment A - Draft Renewed Title V Operating Permit.

## **XI. ATTACHMENTS**

- A. Draft Renewed Title V Operating Permit**
- B. Previous Title V Operating Permit**
- C. Detailed Facility List**
- D. CAM Applicability Review**

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# ATTACHMENT A

Draft Renewed Title V Operating Permit

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# San Joaquin Valley Air Pollution Control District

FACILITY: S-4212-0-1

EXPIRATION DATE: 02/29/2016

## FACILITY-WIDE REQUIREMENTS

1. {4362} The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. {4363} The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. {4364} The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. {4365} Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. {4366} The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.9.1 and 9.13.1] Federally Enforceable Through Title V Permit
6. {4367} A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. {4368} Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. {4369} The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
9. {4370} The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name: SOUTH KERN INDUSTRIAL CENTER LLC  
Location: 2653 SANTIAGO ROAD, TAFT, CA 93268  
S-4212-0-1: Jun 27 2010 11:08AM - RIVALDIR



10. {4371} The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. {4372} Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. {4373} If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
13. {4374} It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. {4375} The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. {4376} The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. {4377} The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. {4378} The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. {4379} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. {4380} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. {4381} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. {4382} Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit

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

22. {4383} No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit
23. {4384} No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. {4385} All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. {4386} The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. {4387} With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. {4388} If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. {4389} If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
29. {4390} Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8021 and 8011] Federally Enforceable Through Title V Permit
30. {4391} Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8031 and 8011] Federally Enforceable Through Title V Permit
31. {4392} An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8041 and 8011] Federally Enforceable Through Title V Permit
32. {4393} Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8051 and 8011] Federally Enforceable Through Title V Permit
33. {4394} Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8061 and 8011] Federally Enforceable Through Title V Permit

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

34. {4395} Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rules 8071 and 8011] Federally Enforceable Through Title V Permit
35. {4396} Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit
36. {4397} The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. {4398} The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. {4399} When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. {4400} Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. {4401} Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
42. On January, 31, 2012, the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report are based upon this initial permit issuance date, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

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-4212-1-6

EXPIRATION DATE: 02/29/2016

## EQUIPMENT DESCRIPTION:

BIOSOLIDS AND AMENDMENTS RECEIVING/MIXING OPERATION, INCLUDING AMENDMENT STORAGE AREA, FEED HOPPER WITH WATER SPRAY MISTERS, CONVEYOR DISCHARGING TO AMENDMENT PILES IN MIXING BUILDING, BIOSOLIDS UNLOADING INTO MIXING BUILDING, WITH MIXING BUILDING AND COVERED FEEDSTOCK CONVEYOR VENTED TO MIXING BUILDING BIOFILTER

## PERMIT UNIT REQUIREMENTS

1. Air pollution equipment (blower fans, ducting, biofilter, etc) shall be properly maintained in good operating condition at all times, except for times of maintenance and/or repair allowed by conditions below. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Each biofilter blower fan may be shut down for a total of 48 hours per 6-month time period for the purpose of maintenance and/or repair. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Feedstock mixing shall be performed in the mixing building, and mixing building shall be vented to biofilter. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Conveyors transferring feedstock from mixing building to feedstock pad shall be covered and ventilated to receiving building biofilter. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Biofilter shall be equipped with operational humidifier and sprinkler systems, and shall be used as needed to maintain optimum biofilter media moisture content. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Amendment feed hopper shall be equipped with operational mist type water spray, and used as needed to ensure visible emissions do not exceed 5% opacity for more than 3 minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
7. VOC destruction efficiency across the biofilter serving the mixing building shall not be less than 80%, or total VOC emission rate from mixing building shall not exceed 2 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. NH3 destruction efficiency across the biofilter serving the mixing building shall not be less than 80%, or total NH3 emission rate from mixing building shall not exceed 2 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. There shall be no visible emissions greater than 5% opacity for more than three minutes in any one hour, from receiving/mixing operation amendment truck unloading, feed hopper loading, outdoor conveyor transfer points, or feed stock stacking conveyor. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Maximum quantity of biosolids introduced into the feedstock mixers shall not exceed 350,000 wet tons on a rolling 12-month basis. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Maximum quantity of amendment introduced into the feedstock mixing operation shall not exceed 320,000 wet tons on a rolling 12-month basis. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Maximum quantity of feedstock discharged from the mixing operation shall not exceed 6,466 wet tons per day. [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.

13. Emissions from amendment feed hopper shall not exceed 0.0001 lb-PM10/ton. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Emissions from amendment conveyor transfer points shall not exceed 4.5E-5 lb-PM10/ton. [District Rule 2201] Federally Enforceable Through Title V Permit
15. VOC emissions from the biofilter serving the mixing building shall not exceed 7.4 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Combined VOC emissions from S-4212-1, '-2 and '-7 shall not exceed 160,398 lb/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
17. NH3 emissions from the biofilter shall not exceed 0.4 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Biofilter media shall be maintained such that the pH remains between 5.0 and 8.0, moisture content between 40 and 80% and temperature between 50 and 95 degrees F, as measured at a depth of at least 2 feet below the media surface. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Biofilter discharge surface, for testing and monitoring purposes, shall be divided into sixteen uniformly sized areas (grids). When source testing the biofilter, a minimum of 8 representative grid points shall be used. [District Rule 1070] Federally Enforceable Through Title V Permit
20. Biofilter exhaust blower discharge pressure shall not exceed 5.0 psig. [District Rule 2201] Federally Enforceable Through Title V Permit
21. Biofilter exhaust blower discharge pressure shall be monitored weekly to ensure system pressure is within permitted operating range. [District Rule 1081] Federally Enforceable Through Title V Permit
22. Biofilter moisture, pH and temperature shall be monitored monthly by sampling one central grid location. Samples shall be taken at two depths beneath the surface. Samples shall be analyzed at in-house laboratory within 48 hours of collection. After collection of biofilter media samples, any sample holes shall be re-filled immediately with the excavated material. [District Rule 1081] Federally Enforceable Through Title V Permit
23. Biofilter media shall be "fluffed" or replaced as needed to maintain the exhaust blower discharge pressure within the normal operating range. [District Rule 2201] Federally Enforceable Through Title V Permit
24. Vegetative growth shall not exceed 10% of the total biofilter surface. [District Rule 2201] Federally Enforceable Through Title V Permit
25. Biofilter shall be checked visually at least weekly for compaction, channeling (cracks), vegetative growth or noticeable increase in detectable odors. [District Rule 2201] Federally Enforceable Through Title V Permit
26. Biofilter media temperature shall be monitored weekly by inserting a manual temperature probe into each biofilter grid location, waiting approximately 30 to 90 seconds for the temperature to stabilize, then recording the temperature. [District Rule 1081] Federally Enforceable Through Title V Permit
27. If any biofilter media temperature reading is out of range, then the biofilter moisture and pH shall be tested, and recorded, for the corresponding grid(s). [District Rule 1081] Federally Enforceable Through Title V Permit
28. If any biofilter monitoring parameter is out of range, the applicant shall perform the necessary maintenance to return the media parameter(s) to the permitted range within 1 week of detecting the problem. All grids which tested out of range shall be re-tested within one week. [District Rule 2201] Federally Enforceable Through Title V Permit
29. Demonstration of compliance with biofilter VOC daily emissions limit (DEL) and control efficiency shall be made within 60 days of replacement of spent media which requires more than 50% of the biofilter media to be replaced. If any ASP biofilters are replacing media concurrent with the replacement of the mixing building biofilter media, then the ASP biofilter source testing may be used as representative testing in demonstrating compliance with VOC control efficiency requirement for the mixing building biofilter. [District Rules 1070 and 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.

30. District witnessed source testing of biofilter performed to measure VOC and NH<sub>3</sub> inlet concentrations, inlet flowrate, and VOC and NH<sub>3</sub> destruction efficiencies across the biofilter, shall be performed by an independent testing laboratory certified for SCAQMD methods 25.3, 207.1, 1.1, 1.2, 2.1, 2.2, 2.3, 3.1 and 4.1. [District Rule 1070] Federally Enforceable Through Title V Permit
31. The following biofilter test methods shall be used: Biofilter temperature - EPA method 170.1, moisture content - TMECC 03.09 (Total solids and moisture at 70+/-5 degrees centigrade), media pH - TMECC 04.11-A (1:5 slurry pH), VOC leaks - EPA Method 21 (VOC leaks), and hydrocarbon analyzer for VOCs calibrated with certified zero and 10 ppmv methane standards. [District Rule 1081] Federally Enforceable Through Title V Permit
32. Operator may use an alternate test method to those listed above for which written approval of the APCO has been obtained. [District Rule 1081] Federally Enforceable Through Title V Permit
33. District shall be notified at least 30 days prior to any compliance source testing, and a source test plan shall be submitted for approval at least 15 days prior to testing. Official test results and field test data from compliance testing shall be submitted within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
34. The following operating parameters shall be documented during times of testing: biofilter exhaust blower discharge pressure and temperature, biofilter air flow, biofilter media temperature (all 16 grids), moisture content and pH (Only two samples of moisture and pH required, samples to be taken at one central location (from at least two feet deep)). Moisture and pH shall also be sampled, and recorded, for every grid in which the temperature is found to be out of the permitted range. [District Rule 1070] Federally Enforceable Through Title V Permit
35. VOC and NH<sub>3</sub> samples shall be analyzed by a lab certified by SCAQMD to perform identified SCAQMD test methods. [District Rule 1081] Federally Enforceable Through Title V Permit
36. Records shall be kept of wet tons per day of biosolids fed into the feedstock mixing operation, daily amendment mix ratio, monthly biofilter temperature, moisture and pH readings, weekly biofilter media temperature and exhaust blower discharge pressure readings, associated biofilter grid locations, and annual VOC emissions on a 12 month rolling average. Records shall be kept of visual inspections and actions taken to correct compaction (and/or high biofilter blower fan pressure(s)), channeling, excessive vegetative growth or a noticeable increase in odors, including date of inspection and date actions were taken to correct problem(s). Records shall be kept of dates and hours each biofilter fan is shutdown for maintenance and/or repair. Records shall be retained on-site for a period of at least five years and made readily available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

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

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# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT: S-4212-2-7**

**EXPIRATION DATE: 02/29/2016**

**EQUIPMENT DESCRIPTION:**

BIOSOLIDS CO-COMPOSTING OPERATION INCLUDING TWO NEGATIVELY AERATED STATIC PILE (ASP) ACTIVE COMPOST AREAS, EACH VENTED TO IT'S OWN BIOFILTER (APPROXIMATELY 19,962 SQ FT EACH), AND TWO ASP CURING COMPOST AREAS, EACH VENTED TO IT'S OWN BIOFILTER (APPROXIMATELY 11,234 SQ FT EACH); INCLUDING BLOWER FANS, COOLING FANS, HUMIDIFIERS AND BIOFILTER SURFACE SPRINKLER SYSTEM

## PERMIT UNIT REQUIREMENTS

1. Active and curing phase composting shall be performed in negatively-aerated static piles (ASPs) with engineered, under pile, grid aeration system venting to a biofilter. [District Rules 2201 and 4565] Federally Enforceable Through Title V Permit
2. ASP biofilters shall be equipped with operational humidifier and sprinkler systems, and shall be used, as needed, to maintain optimum biofilter media moisture content. [District Rules 2201 and 4565] Federally Enforceable Through Title V Permit
3. Air pollution equipment (blower fans, ducting, biofilters, etc) shall be properly maintained in good operating condition at all times, except for times of maintenance and/or repair allowed by conditions below. [District Rules 2201 and 4565] Federally Enforceable Through Title V Permit
4. Each biofilter blower fan may be shut down for a total of 48 hours per 6-month time period for the purpose of maintenance and/or repair. [District Rule 2201] Federally Enforceable Through Title V Permit
5. All active phase ASPs shall be covered with finished compost or wood chips. [District Rule 2201] Federally Enforceable Through Title V Permit
6. VOC destruction efficiency across each biofilter serving the active phase compost ASPs shall not be less than 80%, or total VOC emission rate shall not exceed 2 pounds in any one day. [District Rules 2201 and 4565] Federally Enforceable Through Title V Permit
7. NH3 destruction efficiency across each biofilter serving the active phase compost ASPs shall not be less than 80%, or total NH3 emission rate shall not exceed 2 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Maximum quantity of feedstock (mixed biosolids and amendments) introduced into active phase compost ASPs shall not exceed 6,466 tons/day nor 670,000 tons/year (based on a rolling 12 months). [District Rule 2201] Federally Enforceable Through Title V Permit
9. VOC emissions from this permit unit (includes all ASP surfaces and biofilters serving ASPs) shall not exceed 0.23826 lb/ton throughput. Throughput is defined as wet ton, as mixed, feedstock introduced into active phase compost ASPs. [District Rule 2201] Federally Enforceable Through Title V Permit
10. VOC emissions from the biofilters serving the active and curing phase composting shall not exceed 1,135.1 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Combined VOC emissions from S-4212-1, '-2 and '-7 shall not exceed 160,398 lb/yr. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE  
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12. NH<sub>3</sub> emissions from this permit unit (includes all ASP surfaces and biofilters serving ASPs) shall not exceed 0.2203 lb/ton throughput. Throughput is defined as wet ton, as mixed, feedstock introduced into active phase compost ASPs. [District Rule 2201] Federally Enforceable Through Title V Permit
13. NH<sub>3</sub> emissions from the biofilters serving the active and curing phase composting shall not exceed 279.6 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Permittee shall implement at least two (2) Rule 4565 class one mitigation measures, in addition to one (1) class two mitigation measures for active composting and one (1) class two mitigation measure for curing composting. [District Rule 4565] Federally Enforceable Through Title V Permit
15. Biofilter media shall be maintained such that the pH remains between 4.5 and 8.0, moisture content between 45 and 80% and temperature between 90 and 115 degree F, as measured at a depth of at least 2 feet below the media surface. [District Rules 2201 and 4565; and 40 CFR 64.3] Federally Enforceable Through Title V Permit
16. Aerated Static Piles shall have no measurable increase (<0.45 ppmv increase) over background levels of hydrocarbons within three feet of any surface of any aerated static pile. Testing shall be performed once per quarter in accordance with the requirements of Rule 4565 section 5.4 using a District approved analyzer. [District Rule 4565 and 40 CFR 64.3] Federally Enforceable Through Title V Permit
17. Every ASP biofilter temperature, moisture and pH shall be monitored monthly by sampling at least one central grid location. Samples shall be taken at two depths beneath the surface. Samples shall be analyzed at in-house laboratory within 48 hours of collection. After collection of biofilter media samples, any sample holes shall be re-filled immediately with the excavated material. [District Rules 1081 and 4565; and 40 CFR 64.3] Federally Enforceable Through Title V Permit
18. Biofilter exhaust blower discharge pressure shall not exceed 5.0 psig. [District Rules 2201 and 4565; and 40 CFR 64.3] Federally Enforceable Through Title V Permit
19. Biofilter discharge surface, for testing and monitoring purposes, shall be divided into sixteen uniformly sized areas (grids). When source testing the biofilter, a minimum of 8 representative grid points shall be used. [District Rule 1070] Federally Enforceable Through Title V Permit
20. ASP Biofilter exhaust blower discharge pressures shall be monitored daily to ensure system pressures are within permitted operating range. [District Rules 1081 and 4565; and 40 CFR 64.3] Federally Enforceable Through Title V Permit
21. Biofilter media shall be "fluffed" or replaced, as needed, to maintain the exhaust blower discharge pressures within the permitted operating range. [District Rule 2201 and 40 CFR 64.3] Federally Enforceable Through Title V Permit
22. Vegetative growth shall not exceed 10% of the total biofilter surface. [District Rules 2201 and 4565; and 40 CFR 64.3] Federally Enforceable Through Title V Permit
23. Biofilter shall be checked visually at least weekly for compaction, channeling (cracks), vegetative growth or noticeable increase in detectable odors. [District Rules 2201 and 4565; and 40 CFR 64.3] Federally Enforceable Through Title V Permit
24. Biofilter media temperature shall be monitored weekly by inserting a manual temperature probe into each biofilter grid location, waiting approximately 30 to 90 seconds for the temperature to stabilize, then recording the temperature. [District Rule 1081 and 40 CFR 64.3] Federally Enforceable Through Title V Permit
25. If any ASP biofilter media temperature reading is out of range, then the biofilter moisture and pH shall be tested, and recorded, for the corresponding grid(s). [District Rule 1081 and 40 CFR 64.3] Federally Enforceable Through Title V Permit
26. If any biofilter monitoring parameter is out of range, the applicant shall perform the necessary maintenance to return the media parameter(s) to the permitted range within 1 week of detecting the problem. All grids which tested out of range shall be re-tested within one week. If any grid is still out of range during the re-test, then source testing of the biofilter shall be performed within 60 days to show compliance with the emissions limit and VOC control efficiency of the biofilter. [District Rule 2201 and 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.



27. Demonstration of compliance with biofilter VOC daily emissions limit (DEL) and control efficiency shall be performed no less than once every two years and within 60 days of replacement of spent media or a maintenance (or repair) event which requires more than 50% of the biofilter media to be disturbed. [District Rules 1070, 2201, and 4565; and 40 CFR 64.3] Federally Enforceable Through Title V Permit
28. The following biofilter test methods shall be used: Biofilter temperature - EPA method 170.1, moisture content - TMECC 03.09 (Total solids and moisture at 70+/-5 degrees centigrade), media pH - TMECC 04.11-A (1:5 slurry pH), VOC leaks - EPA Method 21 (VOC leaks), and hydrocarbon analyzer for VOCs calibrated with certified zero and 10 ppmv methane standards. [District Rules 1081 and 4565; and 40 CFR 64.3] Federally Enforceable Through Title V Permit
29. District witnessed source testing to determine inlet and outlet VOC concentrations, flowrate, and destruction efficiency across every biofilter shall be performed not less than once every two years by an independent testing laboratory certified for SCAQMD test methods 25.3, 207.1, 1.1, 1.2, 2.1, 2.2, 2.3, 3.1 and 4.1. [District Rules 1070 and 4565] Federally Enforceable Through Title V Permit
30. Operator may use an alternate test method to those listed above for which written approval of the APCO has been obtained. [District Rules 1081 and 4565] Federally Enforceable Through Title V Permit
31. District shall be notified at least 30 days prior to any compliance source testing, and a source test plan shall be submitted for approval at least 15 days prior to testing. Official test results and field test data from compliance testing shall be submitted within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
32. The following operating parameters shall be documented during times of testing: biofilter exhaust blower discharge pressure and temperature, biofilter air flow, biofilter media temperature (all 16 grids), moisture content and pH (Only two samples of moisture and pH required, samples to be taken at one central location (from at least two feet deep)). Moisture and pH shall also be sampled, and recorded, for every grid in which the temperature is found to be out of the permitted range. [District Rule 1070] Federally Enforceable Through Title V Permit
33. VOC samples shall be analyzed by a lab certified by SCAQMD to perform identified SCAQMD test methods. [District Rule 1081] Federally Enforceable Through Title V Permit
34. Records shall be kept that demonstrate that the facility meets the Rule 4565 class one mitigation measures selected each day that a mitigation measure is performed. [District Rule 4565] Federally Enforceable Through Title V Permit
35. Operator shall maintain an inspection logbook which contains the quarterly VOC hydrocarbon analyzer readings in ppmv for each inspection location (on surface of the ASP), along with the date of the inspection. [District Rule 4565] Federally Enforceable Through Title V Permit
36. Records shall be kept of wet tons per day of biosolids fed into the feedstock mixing operation, daily amendment mix ratio, monthly biofilter temperature, moisture and pH readings, weekly biofilter media temperature and exhaust blower discharge pressure readings, associated biofilter grid locations, and annual VOC emissions on a 12 month rolling average. Records shall be kept of visual inspections and actions taken to correct compaction (and/or high biofilter blower fan pressure(s)), channeling, excessive vegetative growth or a noticeable increase in odors, including date of inspection and date actions were taken to correct problem(s). Records shall be kept of dates and hours each biofilter fan is shutdown for maintenance and/or repair. [District Rules 1070 and 4565] Federally Enforceable Through Title V Permit
37. All records shall be retained on-site for a period of at least five years and made readily available for District inspection upon request. [District Rules 1070 and 4565] Federally Enforceable Through Title V Permit
38. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7. [40 CFR 64.7] Federally Enforceable Through Title V Permit
39. If the District or EPA determine that a quality improvement plan is required under 40 CFR part 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
40. 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

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-4212-4-2

EXPIRATION DATE: 02/29/2016

**EQUIPMENT DESCRIPTION:**

415 BHP DETROIT MODEL 6063MK35 DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR

## PERMIT UNIT REQUIREMENTS

1. This engine shall be equipped with either a positive crankcase ventilation (PCV) system that recirculates crankcase emissions into the air intake system for combustion, or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. Emissions from this engine shall not exceed any of the following: NOx (as NO2): 5.70 grams/hp-hr, CO: 0.40 grams/hp-hr or VOC: 0.14 grams/hp-hr. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The PM10 emissions rate shall not exceed 0.08 grams/hp-hr based on US EPA certification using ISO 8178 test procedure. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rule 4801 and 17 CCR 93115] Federally Enforceable Through Title V Permit
7. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702] Federally Enforceable Through Title V Permit
8. This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rule 4702] Federally Enforceable Through Title V Permit
9. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
10. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702] Federally Enforceable Through Title V Permit
11. This engine shall be operated only for maintenance, testing, and required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 50 hours per calendar year. [District Rules 2201, 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
12. During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702] 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. The permittee shall maintain monthly records that include the type of fuel purchased, the amount of fuel purchased, and the date of fuel purchase. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
14. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.), and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
15. The permittee shall maintain monthly records of all performance tests, opacity and visible emissions observations and required maintenance performed on the air pollution control and monitoring equipment. [District Rule 1070] Federally Enforceable Through Title V Permit
16. The permittee shall maintain monthly records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. The permittee shall also maintain monthly records of action taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [District Rule 1070] Federally Enforceable Through Title V Permit
17. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit

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

**DRAFT**

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# ATTACHMENT B

Previous Title V Operating Permit

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# Permit to Operate

**FACILITY:** S-4212

**EXPIRATION DATE:** 02/29/2016

**LEGAL OWNER OR OPERATOR:**

SOUTH KERN INDUSTRIAL CENTER LLC

**MAILING ADDRESS:**

PO BOX 265  
TAFT, CA 93268

**FACILITY LOCATION:**

2653 SANTIAGO ROAD  
TAFT, CA 93268

**FACILITY DESCRIPTION:**

CO-COMPOSTING

The Facility's Permit to Operate may include Facility-wide Requirements as well as requirements that apply to specific permit units.

This Permit to Operate remains valid through the permit expiration date listed above, subject to payment of annual permit fees and compliance with permit conditions and all applicable local, state, and federal regulations. This permit is valid only at the location specified above, and becomes void upon any transfer of ownership or location. Any modification of the equipment or operation, as defined in District Rule 2201, will require prior District approval. This permit shall be posted as prescribed in District Rule 2010.

Seyed Sadredin  
Executive Director / APCO

Arnaud Marjollet  
Director of Permit Services

# San Joaquin Valley Air Pollution Control District

FACILITY: S-4212-0-0

EXPIRATION DATE: 02/29/2016

## FACILITY-WIDE REQUIREMENTS

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1. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
2. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
3. The owner or operator of any stationary source operation that emits more than 25 tons per year of nitrogen oxides or reactive organic compounds, shall provide the District annually with a written statement in such form and at such time as the District prescribes, showing actual emissions of nitrogen oxides and reactive organic compounds from that source. [District Rule 1160, 5.0] Federally Enforceable Through Title V Permit
4. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
5. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.9.1 and 9.13.1] Federally Enforceable Through Title V Permit
6. A Permit to Operate or an Authority to Construct shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit
7. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
8. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
9. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate. Any amendments to these Facility-wide Requirements that affect specific Permit Units may constitute modification of those Permit Units.

Facility Name: SOUTH KERN INDUSTRIAL CENTER LLC

Location: 2853 SANTIAGO ROAD, TAFT, CA 93288

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10. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
11. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
12. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
13. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
14. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
15. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
16. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
17. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
18. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rule 2520, 9.13.2.1] Federally Enforceable Through Title V Permit
19. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rule 2520, 9.13.2.2] Federally Enforceable Through Title V Permit
20. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
21. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit
22. No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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

23. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
24. All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
25. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
26. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit
27. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee shall comply with the standards for Recycling and Emissions Reduction pursuant to 40 CFR Part 82, Subpart F. [40 CFR 82 Subpart F] Federally Enforceable Through Title V Permit
28. If the permittee performs service on motor vehicles when this service involves the ozone-depleting refrigerant in the motor vehicle air conditioner (MVAC), the permittee shall comply with the standards for Servicing of Motor Vehicle Air Conditioners pursuant to all the applicable requirements as specified in 40 CFR Part 82, Subpart B. [40 CFR Part 82, Subpart B] Federally Enforceable Through Title V Permit
29. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8021 and 8011] Federally Enforceable Through Title V Permit
30. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8031 and 8011] Federally Enforceable Through Title V Permit
31. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8041 and 8011] Federally Enforceable Through Title V Permit
32. Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8051 and 8011] Federally Enforceable Through Title V Permit
33. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8061 and 8011] Federally Enforceable Through Title V Permit
34. Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rules 8071 and 8011] Federally Enforceable Through Title V Permit
35. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit

FACILITY-WIDE REQUIREMENTS CONTINUE ON NEXT PAGE

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



36. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
37. The permittee shall submit an application for Title V permit renewal to the District at least six months, but not greater than 18 months, prior to the permit expiration date. [District Rule 2520, 5.2] Federally Enforceable Through Title V Permit
38. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
39. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following outdated SIP requirements: Rule 401 (Madera, Fresno, Kern, Kings, San Joaquin, Stanislaus, Tulare and Merced), Rule 110 (Fresno, Stanislaus, San Joaquin), Rule 109 (Merced), Rule 113 (Madera), Rule 111 (Kern, Tulare, Kings), and Rule 202 (Fresno, Kern, Tulare, Kings, Madera, Stanislaus, Merced, San Joaquin). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
40. Compliance with permit conditions in the Title V permit shall be deemed in compliance with the following applicable requirements: SJVUAPCD Rules 1100, sections 6.1 and 7.0 (12/17/92); 2010, sections 3.0 and 4.0 (12/17/92); 2031 (12/17/92); 2040 (12/17/92); 2070, section 7.0 (12/17/92); 2080 (12/17/92); 4101 (2/17/05); 4601 (12/17/09); 8021 (8/19/2004); 8031 (8/19/2004); 8041 (8/19/2004); 8051 (8/19/2004); 8061 (8/19/2004); and 8071 (9/16/2004). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit
41. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
42. On January, 31, 2012, the initial Title V permit was issued. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report are based upon this initial permit issuance date, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT: S-4212-1-3**

**EXPIRATION DATE: 02/29/2016**

**EQUIPMENT DESCRIPTION:**

BIOSOLIDS AND AMENDMENTS RECEIVING/MIXING OPERATION, INCLUDING AMENDMENT STORAGE AREA, FEED HOPPER WITH WATER SPRAY MISTERS, CONVEYOR DISCHARGING TO AMENDMENT PILES IN MIXING BUILDING, BIOSOLIDS UNLOADING INTO MIXING BUILDING, WITH MIXING BUILDING AND COVERED FEEDSTOCK CONVEYOR VENTED TO MIXING BUILDING BIOFILTER

## PERMIT UNIT REQUIREMENTS

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1. Air pollution equipment (blower fans, ducting, biofilter, etc) shall be properly maintained in good operating condition at all times, except for times of maintenance and/or repair allowed by conditions below. [District Rule 2201] Federally Enforceable Through Title V Permit
2. Each biofilter blower fan may be shut down for a total of 48 hours per 6-month time period for the purpose of maintenance and/or repair. [District Rule 2201] Federally Enforceable Through Title V Permit
3. Feedstock mixing shall be performed in the mixing building, and mixing building shall be vented to biofilter. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Conveyors transferring feedstock from mixing building to feedstock pad shall be covered and ventilated to receiving building biofilter. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Biofilter shall be equipped with operational humidifier and sprinkler systems, and shall be used as needed to maintain optimum biofilter media moisture content. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Amendment feed hopper shall be equipped with operational mist type water spray, and used as needed to ensure visible emissions do not exceed 5% opacity for more than 3 minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
7. VOC destruction efficiency across the biofilter serving the mixing building shall not be less than 80%, or total VOC emission rate from mixing building shall not exceed 2 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. NH3 destruction efficiency across the biofilter serving the mixing building shall not be less than 80%, or total NH3 emission rate from mixing building shall not exceed 2 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
9. There shall be no visible emissions greater than 5% opacity for more than three minutes in any one hour, from receiving/mixing operation amendment truck unloading, feed hopper loading, outdoor conveyor transfer points, or feed stock stacking conveyor. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Maximum quantity of biosolids introduced into the feedstock mixers shall not exceed 350,000 wet tons on a rolling 12-month basis. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Maximum quantity of amendment introduced into the feedstock mixing operation shall not exceed 320,000 wet tons on a rolling 12-month basis. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Maximum quantity of feedstock discharged from the mixing operation shall not exceed 6,466 wet tons per day. [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.

13. Emissions from amendment feed hopper shall not exceed 0.0001 lb-PM10/ton. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Emissions from amendment conveyor transfer points shall not exceed 4.5E-5 lb-PM10/ton. [District Rule 2201] Federally Enforceable Through Title V Permit
15. VOC emissions from the biofilter serving the mixing building shall not exceed 7.4 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Combined VOC emissions from S-4212-1, '-2 and '-7 shall not exceed 160,398 lb/yr. [District Rule 2201] Federally Enforceable Through Title V Permit
17. NH3 emissions from the biofilter shall not exceed 0.4 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Biofilter media shall be maintained such that the pH remains between 5.0 and 8.0, moisture content between 40 and 80% and temperature between 50 and 95 degrees F, as measured at a depth of at least 2 feet below the media surface. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Biofilter discharge surface, for testing and monitoring purposes, shall be divided into sixteen uniformly sized areas (grids). When source testing the biofilter, a minimum of 8 representative grid points shall be used. [District Rule 1070] Federally Enforceable Through Title V Permit
20. Biofilter exhaust blower discharge pressure shall not exceed 5.0 psig. [District Rule 2201] Federally Enforceable Through Title V Permit
21. Biofilter exhaust blower discharge pressure shall be monitored weekly to ensure system pressure is within permitted operating range. [District Rule 1081] Federally Enforceable Through Title V Permit
22. Biofilter moisture, pH and temperature shall be monitored monthly by sampling one central grid location. Samples shall be taken at two depths beneath the surface. Samples shall be analyzed at in-house laboratory within 48 hours of collection. After collection of biofilter media samples, any sample holes shall be re-filled immediately with the excavated material. [District Rule 1081] Federally Enforceable Through Title V Permit
23. Biofilter media shall be "fluffed" or replaced as needed to maintain the exhaust blower discharge pressure within the normal operating range. [District Rule 2201] Federally Enforceable Through Title V Permit
24. Vegetative growth shall not exceed 10% of the total biofilter surface. [District Rule 2201] Federally Enforceable Through Title V Permit
25. Biofilter shall be checked visually at least weekly for compaction, channeling (cracks), vegetative growth or noticeable increase in detectable odors. [District Rule 2201] Federally Enforceable Through Title V Permit
26. Biofilter media temperature shall be monitored weekly by inserting a manual temperature probe into each biofilter grid location, waiting approximately 30 to 90 seconds for the temperature to stabilize, then recording the temperature. [District Rule 1081] Federally Enforceable Through Title V Permit
27. If any biofilter media temperature reading is out of range, then the biofilter moisture and pH shall be tested, and recorded, for the corresponding grid(s). [District Rule 1081] Federally Enforceable Through Title V Permit
28. If any biofilter monitoring parameter is out of range, the applicant shall perform the necessary maintenance to return the media parameter(s) to the permitted range within 1 week of detecting the problem. All grids which tested out of range shall be re-tested within one week. [District Rule 2201] Federally Enforceable Through Title V Permit
29. Demonstration of compliance with biofilter VOC daily emissions limit (DEL) and control efficiency shall be made within 60 days of replacement of spent media which requires more than 50% of the biofilter media to be replaced. If any ASP biofilters are replacing media concurrent with the replacement of the mixing building biofilter media, then the ASP biofilter source testing may be used as representative testing in demonstrating compliance with VOC control efficiency requirement for the mixing building biofilter. [District Rules 1070 and 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.

30. District witnessed source testing of biofilter performed to measure VOC and NH<sub>3</sub> inlet concentrations, inlet flowrate, and VOC and NH<sub>3</sub> destruction efficiencies across the biofilter, shall be performed by an independent testing laboratory certified for SCAQMD methods 25.3, 207.1, 1.1, 1.2, 2.1, 2.2, 2.3, 3.1 and 4.1. [District Rule 1070] Federally Enforceable Through Title V Permit
31. The following biofilter test methods shall be used: Biofilter temperature - EPA method 170.1, moisture content - TMECC 03.09 (Total solids and moisture at 70+/-5 degrees centigrade), media pH - TMECC 04.11-A (1:5 slurry pH), VOC leaks - EPA Method 21 (VOC leaks), and hydrocarbon analyzer for VOCs calibrated with certified zero and 10 ppmv methane standards. [District Rule 1081] Federally Enforceable Through Title V Permit
32. Operator may use an alternate test method to those listed above for which written approval of the APCO has been obtained. [District Rule 1081] Federally Enforceable Through Title V Permit
33. District shall be notified at least 30 days prior to any compliance source testing, and a source test plan shall be submitted for approval at least 15 days prior to testing. Official test results and field test data from compliance testing shall be submitted within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
34. The following operating parameters shall be documented during times of testing: biofilter exhaust blower discharge pressure and temperature, biofilter air flow, biofilter media temperature (all 16 grids), moisture content and pH (Only two samples of moisture and pH required, samples to be taken at one central location (from at least two feet deep)). Moisture and pH shall also be sampled, and recorded, for every grid in which the temperature is found to be out of the permitted range. [District Rule 1070] Federally Enforceable Through Title V Permit
35. VOC and NH<sub>3</sub> samples shall be analyzed by a lab certified by SCAQMD to perform identified SCAQMD test methods. [District Rule 1081] Federally Enforceable Through Title V Permit
36. Records shall be kept of wet tons per day of biosolids fed into the feedstock mixing operation, daily amendment mix ratio, monthly biofilter temperature, moisture and pH readings, weekly biofilter media temperature and exhaust blower discharge pressure readings, associated biofilter grid locations, and annual VOC emissions on a 12 month rolling average. Records shall be kept of visual inspections and actions taken to correct compaction (and/or high biofilter blower fan pressure(s)), channeling, excessive vegetative growth or a noticeable increase in odors, including date of inspection and date actions were taken to correct problem(s). Records shall be kept of dates and hours each biofilter fan is shutdown for maintenance and/or repair. Records shall be retained on-site for a period of at least five years and made readily available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT: S-4212-2-3**

**EXPIRATION DATE: 02/29/2016**

**EQUIPMENT DESCRIPTION:**

BIOSOLIDS CO-COMPOSTING OPERATION INCLUDING TWO NEGATIVELY AERATED STATIC PILE (ASP) ACTIVE COMPOST AREAS, EACH VENTED TO IT'S OWN BIOFILTER (APPROXIMATELY 19,962 SQ FT EACH), AND TWO ASP CURING COMPOST AREAS, EACH VENTED TO IT'S OWN BIOFILTER (APPROXIMATELY 11,234 SQ FT EACH); INCLUDING BLOWER FANS, COOLING FANS, HUMIDIFIERS AND BIOFILTER SURFACE SPRINKLER SYSTEM

## PERMIT UNIT REQUIREMENTS

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1. Active and curing phase composting shall be performed in negatively-aerated static piles (ASPs) with engineered, under pile, grid aeration system venting to a biofilter. [District Rules 2201 and 4565] Federally Enforceable Through Title V Permit
2. ASP biofilters shall be equipped with operational humidifier and sprinkler systems, and shall be used, as needed, to maintain optimum biofilter media moisture content. [District Rules 2201 and 4565] Federally Enforceable Through Title V Permit
3. Air pollution equipment (blower fans, ducting, biofilters, etc) shall be properly maintained in good operating condition at all times, except for times of maintenance and/or repair allowed by conditions below. [District Rules 2201 and 4565] Federally Enforceable Through Title V Permit
4. Each biofilter blower fan may be shut down for a total of 48 hours per 6-month time period for the purpose of maintenance and/or repair. [District Rule 2201] Federally Enforceable Through Title V Permit
5. All active phase ASPs shall be covered with finished compost or wood chips. [District Rule 2201] Federally Enforceable Through Title V Permit
6. VOC destruction efficiency across each biofilter serving the active phase compost ASPs shall not be less than 80%, or total VOC emission rate shall not exceed 2 pounds in any one day. [District Rules 2201 and 4565] Federally Enforceable Through Title V Permit
7. NH3 destruction efficiency across each biofilter serving the active phase compost ASPs shall not be less than 80%, or total NH3 emission rate shall not exceed 2 pounds in any one day. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Maximum quantity of feedstock (mixed biosolids and amendments) introduced into active phase compost ASPs shall not exceed 6,466 tons/day nor 670,000 tons/year (based on a rolling 12 months). [District Rule 2201] Federally Enforceable Through Title V Permit
9. VOC emissions from this permit unit (includes all ASP surfaces and biofilters serving ASPs) shall not exceed 0.23826 lb/ton throughput. Throughput is defined as wet ton, as mixed, feedstock introduced into active phase compost ASPs. [District Rule 2201] Federally Enforceable Through Title V Permit
10. VOC emissions from the biofilters serving the active and curing phase composting shall not exceed 1,135.1 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
11. Combined VOC emissions from S-4212-1, '-2 and '-7 shall not exceed 160,398 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.

12. NH<sub>3</sub> emissions from this permit unit (includes all ASP surfaces and biofilters serving ASPs) shall not exceed 0.2203 lb/ton throughput. Throughput is defined as wet ton, as mixed, feedstock introduced into active phase compost ASPs. [District Rule 2201] Federally Enforceable Through Title V Permit
13. NH<sub>3</sub> emissions from the biofilters serving the active and curing phase composting shall not exceed 279.6 lb/day. [District Rule 2201] Federally Enforceable Through Title V Permit
14. Permittee shall implement at least two (2) Rule 4565 class one mitigation measures, in addition to one (1) class two mitigation measures for active composting and one (1) class two mitigation measure for curing composting. [District Rule 4565] Federally Enforceable Through Title V Permit
15. Biofilter media shall be maintained such that the pH remains between 4.5 and 8.0, moisture content between 45 and 80% and temperature between 90 and 115 degree F, as measured at a depth of at least 2 feet below the media surface. [District Rules 2201 and 4565; and 40 CFR 64.3] Federally Enforceable Through Title V Permit
16. Aerated Static Piles shall have no measurable increase (<0.45 ppmv increase) over background levels of hydrocarbons within three feet of any surface of any aerated static pile. Testing shall be performed once per quarter in accordance with the requirements of Rule 4565 section 5.4 using a District approved analyzer. [District Rule 4565 and 40 CFR 64.3] Federally Enforceable Through Title V Permit
17. Every ASP biofilter temperature, moisture and pH shall be monitored monthly by sampling at least one central grid location. Samples shall be taken at two depths beneath the surface. Samples shall be analyzed at in-house laboratory within 48 hours of collection. After collection of biofilter media samples, any sample holes shall be re-filled immediately with the excavated material. [District Rules 1081 and 4565; and 40 CFR 64.3] Federally Enforceable Through Title V Permit
18. Biofilter exhaust blower discharge pressure shall not exceed 5.0 psig. [District Rules 2201 and 4565; and 40 CFR 64.3] Federally Enforceable Through Title V Permit
19. Biofilter discharge surface, for testing and monitoring purposes, shall be divided into sixteen uniformly sized areas (grids). When source testing the biofilter, a minimum of 8 representative grid points shall be used. [District Rule 1070] Federally Enforceable Through Title V Permit
20. ASP Biofilter exhaust blower discharge pressures shall be monitored daily to ensure system pressures are within permitted operating range. [District Rules 1081 and 4565; and 40 CFR 64.3] Federally Enforceable Through Title V Permit
21. Biofilter media shall be "fluffed" or replaced, as needed, to maintain the exhaust blower discharge pressures within the permitted operating range. [District Rule 2201 and 40 CFR 64.3] Federally Enforceable Through Title V Permit
22. Vegetative growth shall not exceed 10% of the total biofilter surface. [District Rules 2201 and 4565; and 40 CFR 64.3] Federally Enforceable Through Title V Permit
23. Biofilter shall be checked visually at least weekly for compaction, channeling (cracks), vegetative growth or noticeable increase in detectable odors. [District Rules 2201 and 4565; and 40 CFR 64.3] Federally Enforceable Through Title V Permit
24. Biofilter media temperature shall be monitored weekly by inserting a manual temperature probe into each biofilter grid location, waiting approximately 30 to 90 seconds for the temperature to stabilize, then recording the temperature. [District Rule 1081 and 40 CFR 64.3] Federally Enforceable Through Title V Permit
25. If any ASP biofilter media temperature reading is out of range, then the biofilter moisture and pH shall be tested, and recorded, for the corresponding grid(s). [District Rule 1081 and 40 CFR 64.3] Federally Enforceable Through Title V Permit
26. If any biofilter monitoring parameter is out of range, the applicant shall perform the necessary maintenance to return the media parameter(s) to the permitted range within 1 week of detecting the problem. All grids which tested out of range shall be re-tested within one week. If any grid is still out of range during the re-test, then source testing of the biofilter shall be performed within 60 days to show compliance with the emissions limit and VOC control efficiency of the biofilter. [District Rule 2201 and 40 CFR 64.3] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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27. Demonstration of compliance with biofilter VOC daily emissions limit (DEL) and control efficiency shall be performed no less than once every two years and within 60 days of replacement of spent media or a maintenance (or repair) event which requires more than 50% of the biofilter media to be disturbed. [District Rules 1070, 2201, and 4565; and 40 CFR 64.3] Federally Enforceable Through Title V Permit
28. The following biofilter test methods shall be used: Biofilter temperature - EPA method 170.1, moisture content - TMECC 03.09 (Total solids and moisture at 70+/-5 degrees centigrade), media pH - TMECC 04.11-A (1:5 slurry pH), VOC leaks - EPA Method 21 (VOC leaks), and hydrocarbon analyzer for VOCs calibrated with certified zero and 10 ppmv methane standards. [District Rules 1081 and 4565; and 40 CFR 64.3] Federally Enforceable Through Title V Permit
29. District witnessed source testing to determine inlet and outlet VOC concentrations, flowrate, and destruction efficiency across every biofilter shall be performed not less than once every two years by an independent testing laboratory certified for SCAQMD test methods 25.3, 207.1, 1.1, 1.2, 2.1, 2.2, 2.3, 3.1 and 4.1. [District Rules 1070 and 4565] Federally Enforceable Through Title V Permit
30. Operator may use an alternate test method to those listed above for which written approval of the APCO has been obtained. [District Rules 1081 and 4565] Federally Enforceable Through Title V Permit
31. District shall be notified at least 30 days prior to any compliance source testing, and a source test plan shall be submitted for approval at least 15 days prior to testing. Official test results and field test data from compliance testing shall be submitted within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
32. The following operating parameters shall be documented during times of testing: biofilter exhaust blower discharge pressure and temperature, biofilter air flow, biofilter media temperature (all 16 grids), moisture content and pH (Only two samples of moisture and pH required, samples to be taken at one central location (from at least two feet deep)). Moisture and pH shall also be sampled, and recorded, for every grid in which the temperature is found to be out of the permitted range. [District Rule 1070] Federally Enforceable Through Title V Permit
33. VOC samples shall be analyzed by a lab certified by SCAQMD to perform identified SCAQMD test methods. [District Rule 1081] Federally Enforceable Through Title V Permit
34. Records shall be kept that demonstrate that the facility meets the Rule 4565 class one mitigation measures selected each day that a mitigation measure is performed. [District Rule 4565] Federally Enforceable Through Title V Permit
35. Operator shall maintain an inspection logbook which contains the quarterly VOC hydrocarbon analyzer readings in ppmv for each inspection location (on surface of the ASP), along with the date of the inspection. [District Rule 4565] Federally Enforceable Through Title V Permit
36. Records shall be kept of wet tons per day of biosolids fed into the feedstock mixing operation, daily amendment mix ratio, monthly biofilter temperature, moisture and pH readings, weekly biofilter media temperature and exhaust blower discharge pressure readings, associated biofilter grid locations, and annual VOC emissions on a 12 month rolling average. Records shall be kept of visual inspections and actions taken to correct compaction (and/or high biofilter blower fan pressure(s)), channeling, excessive vegetative growth or a noticeable increase in odors, including date of inspection and date actions were taken to correct problem(s). Records shall be kept of dates and hours each biofilter fan is shutdown for maintenance and/or repair. [District Rules 1070 and 4565] Federally Enforceable Through Title V Permit
37. All records shall be retained on-site for a period of at least five years and made readily available for District inspection upon request. [District Rules 1070 and 4565] Federally Enforceable Through Title V Permit
38. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7. [40 CFR 64.7] Federally Enforceable Through Title V Permit
39. If the District or EPA determine that a quality improvement plan is required under 40 CFR part 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
40. 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

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

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT: S-4212-4-1**

**EXPIRATION DATE: 02/29/2016**

**EQUIPMENT DESCRIPTION:**

415 BHP DETROIT MODEL 6063MK35 DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR

## PERMIT UNIT REQUIREMENTS

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1. This engine shall be equipped with either a positive crankcase ventilation (PCV) system that recirculates crankcase emissions into the air intake system for combustion, or a crankcase emissions control device of at least 90% control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
2. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper ok), roof overhang, or any other obstruction. [District Rule 4102]
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. Emissions from this engine shall not exceed any of the following: NOx (as NO2): 5.70 grams/hp-hr, CO: 0.40 grams/hp-hr or VOC: 0.14 grams/hp-hr. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The PM10 emissions rate shall not exceed 0.08 grams/hp-hr based on US EPA certification using ISO 8178 test procedure. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rule 4801 and 17 CCR 93115] Federally Enforceable Through Title V Permit
7. An emergency situation is an unscheduled electrical power outage caused by sudden and reasonably unforeseen natural disasters or sudden and reasonably unforeseen events beyond the control of the permittee. [District Rule 4702] Federally Enforceable Through Title V Permit
8. This engine shall not be used to produce power for the electrical distribution system, as part of a voluntary utility demand reduction program, or for an interruptible power contract. [District Rule 4702] Federally Enforceable Through Title V Permit
9. On and after May 3, 2013, the engine shall be in full compliance with 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
10. On and after May 3, 2013, the permittee must minimize the engine's time spent at idle during startup and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
11. On and after May 3, 2013, the engine's oil and filter shall be changed every 500 hours of operation or every 12 months, whichever comes first. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
12. On and after May 3, 2013, the engine's air filter shall be inspected every 1,000 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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13. On and after May 3, 2013, the engine's hoses and belts shall be inspected every 500 hours of operation or every 12 months, whichever comes first, and replaced as necessary. [40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
14. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO approved alternative. [District Rule 4702, 17 CCR 93115, and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
15. This engine shall be operated and maintained in proper operating condition as recommended by the engine manufacturer or emissions control system supplier. [District Rule 4702 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
16. This engine shall be operated only for maintenance, testing, and required regulatory purposes, and during emergency situations. Operation of the engine for maintenance, testing, and required regulatory purposes shall not exceed 50 hours per calendar year. [District Rules 2201 and 4702; 17 CCR 93115, and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
17. During periods of operation for maintenance, testing, and required regulatory purposes, the permittee shall monitor the operational characteristics of the engine as recommended by the manufacturer or emission control system supplier (for example: check engine fluid levels, battery, cables and connections; change engine oil and filters; replace engine coolant; and/or other operational characteristics as recommended by the manufacturer or supplier). [District Rule 4702] Federally Enforceable Through Title V Permit
18. The permittee shall maintain monthly records that include the type of fuel purchased, the amount of fuel purchased, and the date of fuel purchase. [District Rule 4702 and 17 CCR 93115] Federally Enforceable Through Title V Permit
19. The permittee shall maintain monthly records of emergency and non-emergency operation. Records shall include the number of hours of emergency operation, the date and number of hours of all testing and maintenance operations, the purpose of the operation (for example: load testing, weekly testing, rolling blackout, general area power outage, etc.), and records of operational characteristics monitoring. For units with automated testing systems, the operator may, as an alternative to keeping records of actual operation for testing purposes, maintain a readily accessible written record of the automated testing schedule. [District Rule 4702; 17 CCR 93115, and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
20. On and after May 3, 2013, the permittee shall maintain monthly records of all performance tests, opacity and visible emissions observations and required maintenance performed on the air pollution control and monitoring equipment. [District Rule 1070 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
21. On and after May 3, 2013, the permittee shall maintain monthly records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. The permittee shall also maintain monthly records of action taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [District Rule 1070 and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit
22. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4702, 17 CCR 93115, and 40 CFR 63 Subpart ZZZZ] Federally Enforceable Through Title V Permit

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

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# ATTACHMENT C

Detailed Facility List

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**Detailed Facility Report**

For Facility=4212

Sorted by Facility Name and Permit Number

SOUTH KERN INDUSTRIAL CENTER LLC 2653 SANTIAGO ROAD TAFT, CA 93268		FAC # STATUS: TELEPHONE:	S 4212 A	TYPE: TOXIC ID:	TitleV	EXPIRE ON: AREA: INSP. DATE:	02/29/2016 71 08/16
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PERMIT NUMBER	FEE DESCRIPTION	FEE RULE	QTY	FEE AMOUNT	FEE TOTAL	PERMIT STATUS	EQUIPMENT DESCRIPTION
S-4212-1-3	400 hp	3020-01 F	1	637.00	637.00	A	BIOSOLIDS AND AMENDMENTS RECEIVING/MIXING OPERATION, INCLUDING AMENDMENT STORAGE AREA, FEED HOPPER WITH WATER SPRAY MISTERS, CONVEYOR DISCHARGING TO AMENDMENT PILES IN MIXING BUILDING, BIOSOLIDS UNLOADING INTO MIXING BUILDING, WITH MIXING BUILDING AND COVERED FEEDSTOCK CONVEYOR VENTED TO MIXING BUILDING BIOFILTER
S-4212-2-3	1,000 hp	3020-01 G	1	855.00	855.00	A	BIOSOLIDS CO-COMPOSTING OPERATION INCLUDING TWO NEGATIVELY AERATED STATIC PILE (ASP) ACTIVE COMPOST AREAS, EACH VENTED TO IT'S OWN BIOFILTER (APPROXIMATELY 19,962 SQ FT EACH), AND TWO ASP CURING COMPOST AREAS, EACH VENTED TO IT'S OWN BIOFILTER (APPROXIMATELY 11,234 SQ FT EACH); INCLUDING BLOWER FANS, COOLING FANS, HUMIDIFIERS AND BIOFILTER SURFACE SPRINKLER SYSTEM
<del>S-4212-3-2</del>	<del>330 hp</del>	<del>3020-01 E</del>	<del>1</del>	<del>432.00</del>	<del>432.00</del>	<del>D</del>	<del>FINISHED COMPOSTING PRODUCT SCREENING AND STACKING OPERATION, INCLUDING FEED HOPPERS, CONVEYORS, TWO TROMMEL SCREENS, DISCHARGE CONVEYORS AND STACKOUT CONVEYORS EQUIPPED WITH OPERATIONAL WATER SPRAY BARS</del>
S-4212-4-1	415 bhp IC engine	3020-10 D	1	502.00	502.00	A	415 BHP DETROIT MODEL 6063MK35 DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR
<del>S-4212-5-1</del>	<del>miscellaneous</del>	<del>3020-06</del>	<del>1</del>	<del>111.00</del>	<del>111.00</del>	<del>D</del>	<del>TRANSPORTABLE TROMMEL MILL SCREEN POWERED BY LIMITED LIFE TIER 2 125 BHP DEERE MODEL 4045H DIESEL-FIRED IC ENGINE INCLUDING DISCHARGE STACKOUT CONVEYOR SERVED BY WATER SPRAY BARS</del>
<del>S-4212-6-0</del>	<del>miscellaneous</del>	<del>3020-06</del>	<del>1</del>	<del>111.00</del>	<del>111.00</del>	<del>D</del>	<del>65 CU YD PER HOUR CAPACITY TROMMEL MILL SCREEN WITH ASSOCIATED CONVEYORS SERVED BY WATER SPRAY BARS AND 49 HP (PERMIT EXEMPT) DIESEL FIRED IC ENGINE</del>
<del>S-4212-7-1</del>	<del>140 hp</del>	<del>3020-10 B</del>	<del>1</del>	<del>123.00</del>	<del>123.00</del>	<del>D</del>	<del>TRANSPORTABLE TROMMEL MILL SCREEN POWERED BY LIMITED LIFE TIER 3 140 BHP DEERE MODEL 4045HF285 DIESEL-FIRED IC ENGINE INCLUDING DISCHARGE STACKOUT CONVEYOR SERVED BY WATER SPRAY BARS</del>

Number of Facilities Reported: 1

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# ATTACHMENT D

CAM Applicability Review

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- {modified 3873} All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 4702, 2520, 9.4, 17 CCR 93115, and 40 CFR 63 Subpart ZZZZ] - §63.6660

**11.40 CFR Part 64, Compliance Assurance Monitoring (CAM)**

**§64.2 – Applicability**

This section requires Compliance Assurance Monitoring (CAM) for units that meet the following three criteria:

- 1) the unit must have an emission limit for the pollutant;
- 2) the unit must have add-on controls for the pollutant; such as flue gas recirculation (FGR), baghouses, and catalytic oxidizers; and
- 3) the unit must have a pre-control potential to emit of greater than the major source thresholds.

<b>Pollutant</b>	<b>Major Source Threshold (lb/year)</b>
NO <sub>x</sub>	20,000
SO <sub>x</sub>	140,000
PM <sub>10</sub>	140,000
CO	200,000
VOC	20,000

- a. **S-4212-1-3: BIOSOLIDS AND AMENDMENTS RECEIVING/MIXING OPERATION, INCLUDING AMENDMENT STORAGE AREA, FEED HOPPER WITH WATER SPRAY MISTERS, CONVEYOR DISCHARGING TO AMENDMENT PILES IN MIXING BUILDING, BIOSOLIDS UNLOADING INTO MIXING BUILDING, WITH MIXING BUILDING AND COVERED FEEDSTOCK CONVEYOR VENTED TO MIXING BUILDING BIOFILTER**

- 1) This unit contains emission limits for PM<sub>10</sub> and VOC emissions.
- 2) Sources of PM<sub>10</sub> emissions are bulking agent feed hopper loading, conveying and mixing (with biosolids in the mixing building). PM10 emissions generated by loading amendments into the amendment feed hopper are minimized by using water spray misters (as needed to eliminate dust emissions). The bulking agents are transferred on enclosed conveyors. Biosolids are added on top of the bulking agents (as the conveyor carrying bulking agents passes by the biosolids loading area). Once the biosolids have been placed on the bulking agents, the moisture is high enough that

PM<sub>10</sub> emissions are not expected beyond that point in the process. Enclosing the biosolids receiving area and venting the biosolids receiving and mixing operations to a biofilter minimizes dust, odors and any VOCs that may be present. The water spray misters can be considered add-on control for PM<sub>10</sub> emissions. Whereas, biofilter can be considered add-on control for VOC emissions. Therefore, pre-control PM<sub>10</sub> and VOC emissions are required to be determined if this unit is subject to CAM for PM<sub>10</sub> and VOC emissions.

- 3) Water spray misters have a control efficiency of 90% (conservative estimate)
- 4) The biofilter system has 80% control efficiency for VOC emissions.

**Pre-control Annual PE for PM<sub>10</sub>:**

The pre-controlled annual PM<sub>10</sub> emissions are calculated as follows:

$$\begin{aligned}\text{Annual throughput} &= 350,000 \text{ ton/year of biosolids} + 320,000 \text{ ton/year} \\ &\quad \text{of amendments} \\ &= 670,000 \text{ ton/year (current PTO)}\end{aligned}$$

EF for amendment feed hopper = 0.0001 lb-PM<sub>10</sub>/ton (current PTO)  
EF for conveyor transfer points = 0.000045 lb-PM<sub>10</sub>/ton (current PTO)  
Thus a combined EF for PM<sub>10</sub> = 0.000145 lb-PM<sub>10</sub>/ton

$$\begin{aligned}\text{PE} &= \text{EF (lb/ton)} \times \text{throughput (ton/hr)} \\ &= (0.000145 \text{ lb-PM}_{10}/\text{ton}) \times (670,000 \text{ ton/year}) \\ &= 97 \text{ lb-PM}_{10}/\text{year}\end{aligned}$$

$$\begin{aligned}\text{Pre-control PE} &= \text{PE} \div (1 - \text{CE}) \\ &= (97 \text{ lb-PM}_{10}/\text{year}) \div (1 - 0.9) \\ &= 970 \text{ lb-PM}_{10}/\text{year}\end{aligned}$$

Since 970 lb-PM<sub>10</sub>/yr < 140,000 lb-PM<sub>10</sub>/yr (Major Source threshold for PM<sub>10</sub>), this unit is not subject to CAM for PM<sub>10</sub> emissions.

**Pre-control Annual PE for VOC:**

Using the VOC emission factor of 0.00114 lb-VOC/ton and the annual throughput limit of 670,000 ton/year from the current PTO (350,000 ton/year of biosolids + 320,000 ton/year of amendments), the pre-controlled annual emissions are calculated as follows:

$$\begin{aligned}\text{PE} &= \text{EF (lb/ton)} \times \text{throughput (ton/hr)} \\ &= (0.00114 \text{ lb-VOC/ton}) \times (670,000 \text{ ton/year}) \\ &= 764 \text{ lb-VOC/year}\end{aligned}$$

$$\begin{aligned}\text{Pre-control PE} &= \text{PE} + (1 - \text{CE}) \\ &= (764 \text{ lb-VOC/year}) + (1 - 0.8) \\ &= \mathbf{3,820 \text{ lb-VOC/year}}\end{aligned}$$

Since 3,820 lb-VOC/yr < 20,000 lb-VOC/yr (Major Source threshold for VOC), this unit is not subject to CAM for VOC emissions.

- b. **S-4212-2-3: BIOSOLIDS CO-COMPOSTING OPERATION INCLUDING TWO NEGATIVELY AERATED STATIC PILE (ASP) ACTIVE COMPOST AREAS, EACH VENTED TO IT'S OWN BIOFILTER (APPROXIMATELY 19,962 SQ FT EACH), AND TWO ASP CURING COMPOST AREAS, EACH VENTED TO IT'S OWN BIOFILTER (APPROXIMATELY 11,234 SQ FT EACH); INCLUDING BLOWER FANS, COOLING FANS, HUMIDIFIERS AND BIOFILTER SURFACE SPRINKLER SYSTEM**

- 1) This unit contains emission limits for VOC emissions only.
- 2) This unit is served by biofilters, which will be considered add-on control for VOC emissions.
- 3) The biofilter system has 80% control efficiency for VOC emissions.

**Pre-control Annual PE:**

Using the permitted VOC emission factor of 0.23826 lb-VOC/ton and the annual throughput limit of 670,000 ton/year from the current PTO, the pre-controlled annual emissions are calculated as follows:

$$\begin{aligned}\text{PE} &= \text{EF (lb/ton)} \times \text{throughput (ton/yr)} \\ &= (0.23826 \text{ lb-VOC/ton}) \times (670,000 \text{ ton/year}) \\ &= \mathbf{159,634 \text{ lb-VOC/year}}\end{aligned}$$

$$\begin{aligned}\text{Pre-control PE} &= \text{PE} + (1 - \text{CE}) \\ &= (159,634 \text{ lb-VOC/year}) + (1 - 0.8) \\ &= \mathbf{798,170 \text{ lb-VOC/year}}\end{aligned}$$

Since 798,170 lb-VOC/yr > 20,000 lb-VOC/yr (Major Source threshold for VOC), this unit is subject to CAM for VOC emissions.

### **§64.3 - Monitoring Design Criteria**

This section specifies the design criteria for the CAM system.

**Paragraph (a) (General criteria)** requires that the CAM system be designed to obtain data for one or more appropriate indicators of emission control system performance and requires the owner to establish appropriate ranges or designated conditions for the selected indicators such that operation within the ranges provides a reasonable assurance of ongoing compliance with emission limitations or standards for the anticipated range of operating conditions.

As shown above, the biosolids composting operation (S-4212-2-3) is served by biofilters that are subject to CAM. The biofilters reduce VOC emissions by passing collected vapors through media at specified temperatures, moisture content and residence time to allow for the biological conversion of organic compounds to water vapor and carbon dioxide. These control devices are passive systems that do not include mechanical systems that can be monitored for performance.

SKIC is required to monitor biofilter operational parameters to ensure compliance with the approved emissions limitations. SKIC has elected to utilize these same parameters for compliance with CAM requirements. Therefore, the requirements of this section have been satisfied.

**Paragraph (b) (Performance criteria)** requires the owner or operator to establish and maintain the following:

- Specifications to ensure that representative data are collected.  
  
Periodic monitoring of the biofilter temperatures, pH, moisture content and fan static pressure is collected to ensure proper operation of the biofilters. SKIC has collected and provided sufficient data to the District for this operation. This data has been previously analyzed by the District (see Attachment E) to establish monitoring parameters for each biofilter operating in compliance to justify the daily, weekly, monthly and/or quarterly readings as representative.
- Verification procedures to confirm the operational status of the monitoring for new or modified monitoring equipment.

No new or modified monitoring equipment is proposed; therefore, further discussion is not required.



- Quality assurance and control practices to ensure continuing validity of data.

Due to the relatively slow nature of the composting operation along with delayed response time, periodic source tests (at least once every 24 months); daily monitoring of blower discharge pressure; weekly monitoring of each biofilter for temperature, compaction, channeling (cracks), vegetative growth and noticeable increase in detectable odor; monthly monitoring of biofilter temperature, moisture and pH; and quarterly VOC monitoring within three feet of any aerated static pile are satisfactory indicator of control system performance. Additional practices are not warranted for this facility.

- Data collection frequency and procedures.

§64.3(b)(4) states that specifications for the frequency of conducting the monitoring, the data collection procedures that will be used (e.g., computerized data acquisition and handling, alarm sensor, or manual log entries based on gauge readings), and, if applicable, the period over which discrete data points will be averaged for the purpose of determining whether an excursion or exceedance has occurred.

(i) At a minimum, the owner or operator shall design the period over which data are obtained and, if applicable, averaged consistent with the characteristics and typical variability of the pollutant-specific emissions unit (including the control device and associated capture system). Such intervals shall be commensurate with the time period over which a change in control device performance that would require actions by owner or operator to return operations within normal ranges or designated conditions is likely to be observed.

(ii) For all pollutant-specific emissions units with the potential to emit, calculated including the effect of control devices, the applicable regulated air pollutant in an amount equal to or greater than 100 percent of the amount, in tons per year, required for a source to be classified as a major source, for each parameter monitored, the owner or operator shall collect four or more data values equally spaced over each hour and average the values, as applicable, over the applicable averaging period as determined in accordance with paragraph (b)(4)(i) of this section. The permitting authority may approve a reduced data collection frequency, if appropriate, based on information presented by the owner or operator concerning the data collection mechanisms available for a particular parameter for the particular pollutant-specific emissions unit (e.g., integrated raw material or fuel analysis data,

noninstrumental measurement of waste feed rate or visible emissions, use of a portable analyzer or an alarm sensor).

(iii) For other pollutant-specific emissions units, the frequency of data collection may be less than the frequency specified in paragraph (b)(4)(ii) of this section but the monitoring shall include some data collection at least once per 24-hour period (e.g., a daily inspection of a carbon adsorber operation in conjunction with a weekly or monthly check of emissions with a portable analyzer).

As shown in the CAM applicability calculations above, permit unit S-4212-2-3 is a large pollutant-specific emission unit (PSEU) and §64.3(b)(4)(ii) requires that large PSEUs must collect monitoring data at least every 15 minutes (collect four or more data values equally spaced over each hour and average the values). However, §64.3(b)(4)(ii) also allows that the permitting authority (District) may approve a reduced data collection frequency, if appropriate, based on the information provided by the owner or operator. SKIC has collected and provided sufficient data to the District for this operation. This data has been previously analyzed by the District (see Attachment E) to establish monitoring parameters for each biofilter operation.

Due to the relatively slow nature of the composting operation along with delayed response time, the District has approved a reduced data collection frequency based on the data provided by SKIC. In addition, §64.3(b)(4)(iii) requires that for large PSEUs the monitoring shall include some data collection at least once per 24-hour period. Therefore, the District has approved the daily monitoring of the blower discharge pressure.

Thus periodic source tests (at least once every 24 months); daily monitoring of blower discharge pressure; weekly monitoring of each biofilter for temperature, compaction, channeling (cracks), vegetative growth and noticeable increase in detectable odor; monthly monitoring of biofilter temperature, moisture and pH; and quarterly VOC monitoring within three feet of any aerated static pile are satisfactory indicator of control system performance. Additional practices are not warranted for this facility.

SKIC is currently required to maintain records of all required emissions testing and biofilter monitoring activities and make such records readily available for District inspection upon request. SKIC's existing data collection and retention procedures assure correct compliance with 40 CFR Part 64.

Conditions of approval numbers 15 through 28 will be amended to include a reference to 40 CFR Part 64.

**Paragraph (c) (Evaluation factors)** requires the owner or operator to take into account site specific factors in the design of the CAM system.

This paragraph states "In designing monitoring to meet the requirements of this section, the owner or operator shall take into account site-specific factors including the applicability of existing monitoring equipment and procedures, the ability of the monitoring to account for process and control device operational variability, the reliability and latitude built into the control technology, and the level of actual emissions relative to the compliance limitation."

The proposed CAM plan utilizes the existing District approved biofilter monitoring parameters that have been demonstrated to effectively ensure compliance. Therefore, no additional factors need to be evaluated and the requirements of this section are satisfied. No further discussion is required.

**Paragraph (d) Special criteria for the use of continuous emission monitoring system (CEMS), continuous opacity monitoring system (COMS) or predictive emission monitoring system (PEMS).**

A CEMS, COMS or PEMS is not necessary or required for the subject emission unit. Therefore, the requirements of this section are not applicable and no further discussion is required.

#### **§64.4 - Submittal Requirements**

This section specifies submittal requirements for the owner or operator which ensure the CAM system will comply with the design criteria of §64.3. SKIC has submitted a complete CAM system proposal that specifies the parameters to be monitored in accordance with §64.3 above. Therefore, SKIC has satisfied the requirements of this section and no further discussion is required.

#### **§64.5 - Deadlines for Submittals**

This section specifies required timing for submittals required under §64.4.

*Large pollutant-specific emissions units* (those with controlled emissions exceeding major source thresholds) are required to make the submittals as a part of the initial Title V permit application where the application has either not been filed or has not been deemed complete. Where the initial Title V permit has been issued without implementation of 40 CFR 64, the owner or operator must make the required submittals as a part of a subsequent application for any significant permit revision. If the required information is not submitted by either of these deadlines, it must be submitted as a part of the application for the Title V permit renewal.

For other pollutant-specific emissions units, the required submittal deadline is the application for Title V permit renewal. SKIC has submitted their CAM proposal along with this application for the initial Title V permit. Therefore, SKIC has satisfied the submittal deadline requirements of this section and no further discussion is required

#### **§64.6 - Approval of monitoring**

This section stipulates the following:

- A requirement that the permitting authority act to approve the proposed monitoring by confirming that the monitoring submitted complies with the requirements of §64.3.
- An allowance for the permitting authority to condition the approval based on collecting additional data on the indicators to be monitored, including performance or compliance testing.
- The minimum conditions that must be placed on the permit in the event that the proposed monitoring is approved by the permitting authority including a milestone schedule for completion of any conditional approval actions required by the owner or operator, such as installations, testing, or verification of operational status.
- Actions required by the permitting authority in the event that the proposed monitoring is not approved.

The CAM submittal requirements and stipulations for approval of such submittals pursuant to §64.4, §64.5, and §64.6 have been completed in conjunction with the application and review process for the issuance of the Authorities to Construct issued by the District and the initial Title V permit. Therefore, SKIC is in compliance with the requirements of this section and no further discussion is required.

### **§64.7 - Operation of Approved Monitoring**

This section stipulates the following:

- Requirements that the owner or operator 1) commence the monitoring upon receipt of a Title V permit that includes such monitoring, 2) properly maintain the monitoring system, and 3) conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating.
- Exemption to continuous monitoring during malfunctions, associated repairs, and quality assurance and control activities.
- Actions required by the owner or operator in response to excursions or exceedances.
- A requirement for the owner or operator to document any need for improved monitoring based upon either an identification of a failure of the monitoring system to identify an excursion or exceedance or upon the results of compliance or performance testing that identifies a need to modify the monitoring.

The following condition is included as condition 38 on the Title V Title V permit S-4212-2-3 to ensure compliance:

- The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7. [40 CFR 64.7]

### **§64.8 - Quality Improvement Plan (QIP) Requirements**

This section stipulates that the Administrator or the permitting authority may require that the facility develop and implement a QIP in the event of a determination of a need for improved monitoring pursuant to §64.1. §64.8 also identifies the minimum elements required in the QIP and requires that the facility implement the QIP as expeditiously as possible, with implementation not exceeding 180 days after the date that the need for implementation was identified unless the permitting authority is notified.

The following condition is included as condition 39 on the Title V Title V permit S-4212-2-3 to ensure compliance:

- If the District or EPA determine that a quality improvement plan is required under 40 CFR part 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]

**§64.9 - Reporting and Recordkeeping Requirements**

This section stipulates the minimum reporting and recordkeeping requirements for facilities subject to 40 CFR 64.

- Condition 34, 35, 36, and 37 of the existing permit to operate assures compliance with the recordkeeping requirements of this section.

The following condition is included as condition 40 on the Title V Title V permit S-4212-2-3 to ensure compliance:

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

**§64.10 - Savings Provisions**

This section states that the purpose of 40 CFR 64 is to require, as a part of the issuance of a Title V permit, improved or new monitoring at those emissions units where monitoring requirements do not exist or are inadequate to meet the requirements of 40 CFR 64. In addition, §64.10 states that nothing in 40 CFR 64 shall excuse an owner or operator from any other requirements of federal, state or local law or restrict or abrogate the authority of the Administrator or of the permitting authority.

Improved or new monitoring requirements are not applicable to this permit unit. Therefore, SKIC has satisfied the requirements of this section and no further discussion is required.

- c. ~~S-4212-3-2: FINISHED COMPOSTING PRODUCT SCREENING AND STACKING OPERATION, INCLUDING FEED HOPPERS, CONVEYORS, TWO TROMMEL SCREENS, DISCHARGE CONVEYORS AND STACKOUT CONVEYORS EQUIPPED WITH OPERATIONAL WATER SPRAY BAR(S)~~

*↗ n/a - PTO cancelled*

The permit unit has emissions limits for VOC and NH<sub>3</sub> emissions but no add-on controls. Therefore, this unit is not subject to CAM for these pollutants.

- d. **S-4212-4-1: 415 BHP DETROIT MODEL 6063MK35 DIESEL-FIRED EMERGENCY STANDBY IC ENGINE POWERING AN ELECTRICAL GENERATOR**

The permit unit has emissions limits for NO<sub>x</sub>, SO<sub>x</sub>, CO, PM<sub>10</sub>, and VOC emissions but no add-on controls. Therefore, this unit is not subject to CAM for these pollutants.

- e. **S-4212-5-1: TRANSPORTABLE TROMMEL MILL SCREEN POWERED BY LIMITED LIFE TIER 2 125 BHP DEERE MODEL 4045H DIESEL-FIRED IC ENGINE INCLUDING DISCHARGE STACKOUT CONVEYOR SERVED BY WATER SPRAY BARS**

The permit unit has emissions limits for VOC and NH<sub>3</sub> emissions but no add-on controls. Therefore, this unit is not subject to CAM for these pollutants.

*n/a - PTO cancelled*

## X. PERMIT SHIELD

A permit shield legally protects a facility from enforcement of the shielded regulations when a source is in compliance with the terms and conditions of the Title V permit. Compliance with the terms and conditions of the Operating Permit is considered compliance with all applicable requirements upon which those conditions are based, including those that have been subsumed.

### A. Requirements Addressed by Model General Permit Templates

By using the model general permit template SJV-UM-0-3, the applicant has requested that a permit shield be issued for requirements addressed in the template. The basis for each permit shield is discussed in the Permit Shield Section V of Template SJV-UM-0-3. This permit shield is included in conditions 39 and 40 of the facility wide requirements S-4212-0-0.

### B. Requirements not Addressed by Model General Permit Templates

The applicant does not request a permit shield for the requirements not addressed by the general permit templates. No permit shield is being granted for the requirements not addressed by the general permit templates.