



OCT 19 2018

Ms. Wendy Garcia
Vitro Flat Glass LLC
3333 S Peach Ave
Fresno, CA 93722

Re: Proposed ATC / Certificate of Conformity (Significant Mod)
Facility Number: C-948
Project Number: C-1182342

Dear Ms. Garcia:

Enclosed for your review is the District's analysis of an application for Authorities to Construct for the facility identified above. You requested that Certificates of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. This project authorizes the reduction of throughput for the cullet crushing operation on existing unit C-948-7, updating the emission factors on existing unit C-948-10, and revisions to the visible emissions requirements on both units.

After addressing all comments made during the 30-day public notice and the 45-day EPA comment periods, the District intends to issue the Authorities to Construct with Certificates of Conformity. Please submit your comments within the 30-day public comment period, as specified in the enclosed public notice. Prior to operating with modifications authorized by the Authorities to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

If you have any questions, please contact Mr. Errol Villegas, Permit Services Manager, at (559) 230-5900.

Samir Sheikh
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
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Ms. Wendy Garcia
Page 2

Thank you for your cooperation in this matter.

Sincerely,



Arnaud Marjollet
Director of Permit Services

Enclosures

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

San Joaquin Valley Air Pollution Control District
Authority to Construct Application Review
Modification of Cullet Handling Operations

| | | | |
|-------------------|--|----------------|------------------|
| Facility Name: | Vitro Flat Glass LLC | Date: | October 10, 2018 |
| Mailing Address: | 3333 S Peach Ave Fresno, CA 93722 | Engineer: | Jesse A. Garcia |
| Contact Person: | Wendy Garcia | Lead Engineer: | Joven Refuerzo |
| Telephone: | 559-493-3204 | | |
| E-Mail: | wgarcia@vitro.com | | |
| Application #(s): | C-948-7-8 & -10-13 | | |
| Project #: | C-1182342 | | |
| Deemed Complete: | August 10, 2018 | | |

I. Proposal

The primary business of Vitro Flat Glass LLC (Vitro) is the manufacturing of flat glass. Vitro has submitted Authority to Construct (ATC) applications for the following:

C-948-7

- Reduce throughput of the cullet crushing operation from 5,183 tons/day to 2,769 tons/day.
- With the modification above, remove the Compliance Assurance Monitoring (CAM) requirement to perform daily visible emission inspections using EPA Method 22 since the permit unit will no longer be subject to CAM after the modification to reduce the throughput.

C-948-10

- Update the emission factors for the material handling operation.
- With the modification above, remove the CAM requirement to perform daily visible emission inspections using EPA Method 22 since the permit unit will no longer be subject to CAM after the modification to update the emission factors.

ATC C-948-10-12 has been implemented and serves as the base document although it has not been administratively converted to a permit yet. Current PTO S-948-10-9 and ATC C-948-10-12 are included in **Appendix A**. The following condition will be listed on the ATC issued in this project:

- Authority to Construct (ATC) C-948-10-12 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this Authority to Construct. [District Rule 2201]

Vitro has received their Title V Permit. This modification can be classified as a Title V significant modification pursuant to Rule 2520, and can be processed with a Certificate of Conformity (COC). Since the facility has specifically requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct. Vitro must apply to administratively amend their Title V permit.

II. Applicable Rules

| | |
|--|---|
| Rule 2201 | New and Modified Stationary Source Review Rule (2/18/16) |
| Rule 2410 | Prevention of Significant Deterioration (6/16/11) |
| Rule 2520 | Federally Mandated Operating Permits (6/21/01) |
| Rule 4001 | New Source Performance Standards (4/14/99) |
| Rule 4002 | National Emissions Standards for Hazardous Air Pollutants (5/20/04) |
| Rule 4101 | Visible Emissions (2/17/05) |
| Rule 4102 | Nuisance (12/17/92) |
| Rule 4201 | Particulate Matter Concentration (12/17/92) |
| Rule 4202 | Particulate Matter – Emission Rate (12/17/92) |
| 40 CFR 64 | Compliance Assurance Monitoring (CAM) |
| CH&SC 41700 | Health Risk Assessment |
| CH&SC 42301.6 | School Notice |
| Public Resources Code 21000-21177: California Environmental Quality Act (CEQA) | |
| California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA Guidelines | |

III. Project Location

This facility is located at 3333 S Peach Ave in Fresno, CA. The facility is not located within 1,000 feet of any K-12 school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

IV. Process Description

Vitro manufactures glass. Six main ingredients - sand, limestone, dolomite, soda ash (sodium carbonate), salt cake (sodium sulfate), and cullet (recycles glass) - are used to make glass. Of these ingredients, sand is the primary component, comprising approximately 4,000 pounds per 6,800-pound batch of ingredients.

The batch making operations are conducted in the batch house basement. The ingredients are weighed out from the storage silos and discharged onto an enclosed batch gathering conveyor belt. The gathering belt discharges into a bucket elevator, which carries all the ingredients into the batch mixer for mixing prior to delivery to the furnace. The mixed ingredients are then discharged onto a lead-out belt and carried into the furnace. In the furnace, the ingredients are melted to form liquid glass, which flows downstream on a liquid tin bath. As the liquid glass travels farther downstream from the furnace, it is progressively cooled to form solid plate glass.

There will be no change to the existing control equipment or process equipment in this project.

V. Equipment Listing

Pre-Project Equipment Description:

- C-948-7-7: 517,000 GALLON CULLET STORAGE SILO #4 AND CULLET CRUSHING OPERATION WITH CULLET CRUSHER, CULLET ELEVATOR SERVED BY A PANGBORN CORPORATION BAGHOUSE FABRIC COLLECTOR #DC-5, SERIAL #42-CH3-6656, AND CULLET SCREENING BOX
- C-948-10-12: SILO UNLOADING AND MIXING OPERATION INCLUDING BATCH GATHERING BELT SERVED BY MACPROCESS MODEL AVS/AVSC DUST COLLECTOR, PANGBORN CORP DC-6 BAGHOUSE DUST COLLECTOR (SN 63-CH3-6671) SHARED WITH PERMIT UNIT '6 OR DC-2 BAGHOUSE DUST COLLECTOR (SN 67 CH3-6664) UNDER PERMIT UNIT '6, AND A BATCH ELEVATOR, TOTALIZING SCALE, AND GLASS MASTER TURBIN MODEL 12000 MIXER SERVED BY A TORIT DOWN FLO-II MODEL #DFT-2-4 BAGHOUSE DUST COLLECTOR

Proposed Modification:

- C-948-7-8: MODIFICATION OF 517,000 GALLON CULLET STORAGE SILO #4 AND CULLET CRUSHING OPERATION WITH CULLET CRUSHER, CULLET ELEVATOR SERVED BY A PANGBORN CORPORATION BAGHOUSE FABRIC COLLECTOR #DC-5, SERIAL #42-CH3-6656, AND CULLET SCREENING BOX: REDUCE THROUGHPUT OF CULLET CRUSHING OPERATION ALLOWING FOR THE REMOVAL OF COMPLIANCE ASSURANCE MONITORING (CAM) REQUIREMENTS
- C-948-10-13: MODIFICATION OF SILO UNLOADING AND MIXING OPERATION INCLUDING BATCH GATHERING BELT SERVED BY MACPROCESS MODEL AVSC DUST COLLECTOR, PANGBORN CORP DC-6 BAGHOUSE DUST COLLECTOR (SN 63-CH3-6671) SHARED WITH PERMIT UNIT '6 OR DC-2 BAGHOUSE DUST COLLECTOR (SN 67 CH3-6664) UNDER PERMIT UNIT '6, AND A BATCH ELEVATOR, TOTALIZING SCALE, AND GLASS MASTER TURBIN MODEL 12000 MIXER SERVED BY A TORIT DOWN FLO-II MODEL #DFT-2-4 BAGHOUSE DUST COLLECTOR: UPDATE THE PM10 EMISSION FACTORS ALLOWING FOR THE REMOVAL OF COMPLIANCE ASSURANCE MONITORING (CAM) REQUIREMENTS

Post Project Equipment Description:

- C-948-7-8: 517,000 GALLON CULLET STORAGE SILO #4 AND CULLET CRUSHING OPERATION WITH CULLET CRUSHER, CULLET ELEVATOR SERVED BY A PANGBORN CORPORATION BAGHOUSE FABRIC COLLECTOR #DC-5, SERIAL #42-CH3-6656, AND CULLET SCREENING BOX

C-948-10-13: SILO UNLOADING AND MIXING OPERATION INCLUDING BATCH GATHERING BELT SERVED BY MACPROCESS MODEL AVSC DUST COLLECTOR, PANGBORN CORP DC-6 BAGHOUSE DUST COLLECTOR (SN 63-CH3-6671) SHARED WITH PERMIT UNIT '-6 OR DC-2 BAGHOUSE DUST COLLECTOR (SN 67 CH3-6664) UNDER PERMIT UNIT '-6, AND A BATCH ELEVATOR, TOTALIZING SCALE, AND GLASS MASTER TURBIN MODEL 12000 MIXER SERVED BY A TORIT DOWN FLO-II MODEL #DFT-2-4 BAGHOUSE DUST COLLECTOR

VI. Emission Control Technology Evaluation

PM10 is the pollutant of concern emitted from the material handling operation and storage operation for the units being modified in this project. The PM10 emissions are controlled with a dust collector. As established in previous projects (C-1132033 for C-948-7 and C-1172438 for C-948-10) the control efficiency is at least 99% for C-948-7 and -10.

No new control device is proposed with this project.

VII. General Calculations

A. Assumptions

To streamline emission calculations, PM2.5 emissions are assumed to be equal to PM10 emissions. Only if needed to determine if a project is a Federal major modification for PM2.5 will specific PM2.5 emission calculations be performed.

- Facility operates 24 hours per day, 365 days per year (worst case)
- PM10 is the only pollutant of concern in this project
- Permit C-948-7:
 - Pre-project maximum daily amount of material processed in the crusher shall not exceed 5,183 tons/day (current PTO)
 - Post-project maximum daily amount of material processed in the crusher shall not exceed 2,769 tons/day (proposed by applicant)
 - Pre and post-project maximum daily amount of material processed in the cullet screening box and the belt conveyors is 650 tons/day (per project C-1132033)
- Permit C-948-10: There will be no change in material throughput rates or overall process control efficiency.

B. Emission Factors

C-948-7

| Controlled Emission Factors | | |
|-----------------------------|-------------|------------------------------|
| Emission Unit | Ib-PM10/ton | Source |
| crushing | 0.0012 | AP-42 Table 11.19.2-2 (8/04) |
| screening | 0.00074 | AP-42 Table 11.19.2-2 (8/04) |
| conveyor | 0.000046 | AP-42 Table 11.19.2-2 (8/04) |

C-948-10

The emission factors used to calculate the potential emissions on the current permit are as follows:

| Emission Factors | | | |
|-------------------------|-----------------------------------|---------------------------------|---|
| Emission Unit | Uncontrolled (lb-PM10/ton) | Controlled (lb-PM10/ton) | Source |
| Storage Silos to Mixer | 0.025 | 0.00025 | AP-42, 13.2.4-4 (1/95): Uncontrolled Aggregate Handling Drop Point EF (0.004) x 2 drop points (conveyor to bucket elev, bucket elev to mixer) + AP-42 11.19.2-2 - Uncontrolled Conveyor Transfer Point (silo to conveyor) (Crushed Stone) |
| Mixing and Weighing | 0.6 | 0.006 | AP-42 Table 11.19.2-2 (1/95) (Crushed Stone) |
| Mixer Loadout | 0.0014 | 0.0014 | AP-42 Table 11.19.2-2 (1/95) (Crushed Stone) |

Except for the emission factors taken from AP-42, 13.2.4-4 (although the section has since been revised, the drop equation remains the same and therefore remains valid), the above emission factors that were used in previous permitting actions are taken from an outdated version of AP-42.

Pursuant to District Policy APR-1110, the following revised emission factors will be used to calculate pre and post project emissions:

| Emission Factors | | | |
|-------------------------|-----------------------------------|---------------------------------|---|
| Emission Unit | Uncontrolled (lb-PM10/ton) | Controlled (lb-PM10/ton) | Source |
| Storage Silos to Mixer | 0.012 | 0.00012 | AP-42, 13.2.4-4 (11/06): Uncontrolled Aggregate Handling Drop Point EF (0.004) x 3 drop points (conveyor to bucket elev., bucket elev. to mixer, bucket elev. to mixer) |
| Mixing and Weighing | 0.3 | 0.003 | AP-42 Table 11.13-1 (9/85) (Glass Fiber Manufacturing) |
| Mixer Loadout | 0.004 | 0.00004 | AP-42, 13.2.4-4 (11/06): Uncontrolled Aggregate Handling Drop Point EF (0.004) x 1 drop points |

Since all three transfer points from the storage silos to the mixer are controlled by the dust collector, all emission points are considered controlled and are revised appropriately. The unloading and conveying emission factor from AP-42, 11.13-1 (Glass Fiber Manufacturing) was not used since that emission factor contains emissions from the receiving of the material which is not representative of this permit unit.

The mixing and weighing emission factor is taken from AP-42, 11.13-1 (Glass Fiber Manufacturing) since the operation covered by this emission factor is representative of the operation listed in this permit. 50% of PM is assumed to be PM10 per Rule 2201, 4.11; therefore, the stated uncontrolled emission factor for PM of 0.6 lb/ton will be multiplied by 50% to yield an uncontrolled emission factor for PM10 of 0.3 lb/ton.

The mixer loadout operation is similar in nature to transfer points between the storage silos to the mixer; therefore, AP-42, 13.2.4-4 (11/06) is used to obtain the emission factor, similar to the storage silos to mixer emission factor.

C. Calculations

1. Pre-Project Potential to Emit (PE1)

C-948-7

Crushing

$$\begin{aligned} \text{Daily PE1} &= 5,183 \text{ tons/day} \times 0.0012 \text{ lb/ton} \\ &= 6.2 \text{ lb-PM}_{10}/\text{day} \end{aligned}$$

$$\begin{aligned} \text{Annual PE1} &= 5,183 \text{ tons/day} \times 0.0012 \text{ lb/ton} \times 365 \text{ days/year} \\ &= 2,270 \text{ lb-PM}_{10}/\text{year} \end{aligned}$$

Cullet Screening Box

$$\begin{aligned} \text{Daily PE1} &= 650 \text{ tons/day} \times 0.00074 \text{ lb/ton} \\ &= 0.5 \end{aligned}$$

$$\begin{aligned} \text{Annual PE1} &= 650 \text{ tons/day} \times 0.00074 \text{ lb/ton} \times 365 \text{ days/year} \\ &= 176 \text{ lb-PM}_{10}/\text{year} \end{aligned}$$

Belt Conveyor

$$\begin{aligned} \text{Daily PE1} &= 650 \text{ tons/day} \times 0.000046 \text{ lb/ton} \\ &= 0.0 \end{aligned}$$

$$\begin{aligned} \text{Annual PE1} &= 650 \text{ tons/day} \times 0.000046 \text{ lb/ton} \times 365 \text{ days/year} \\ &= 11 \text{ lb-PM}_{10}/\text{year} \end{aligned}$$

| Pre-Project Potential to Emit Summary | | | |
|--|----------------------------------|---|---|
| Permit | Emission Unit | Daily PE1 (lb PM₁₀/day) | Annual PE1 (lb PM₁₀/year) |
| C-948-7 | Cullet Crushing Operation | 6.2 | 2,270 |
| | Cullet Screening Box | 0.5 | 176 |
| | Belt Conveyor | 0.0 | 11 |
| | Total | 6.7 | 2,457 |

C-948-10

Storage silos to mixer

Daily PE1 = 0.00012 lb/ton x 1,180 tons/day
= 0.1 lb-PM₁₀/day

Annual PE1 = 0.00025 lb/ton x 1,180 tons/day x 365 days/year
= 52 lb-PM₁₀/year

Mixing and weighing

Daily PE1 = 0.003 lb/ton x 1,180 tons/day
= 3.5 lb-PM₁₀/day

Annual PE1 = 0.003 lb/ton x 1,180 tons/day x 365 days/year
= 1,292 lb-PM₁₀/year

Mixer loadout

Daily PE1 = 0.00004 lb/ton x 1,180 tons/day
= 0.0 lb-PM₁₀/day

Annual PE1 = 0.00004 lb/ton x 1,180 tons/day x 365 days/year
= 17 lb-PM₁₀/year

| Pre-Project Potential to Emit Summary | | | |
|--|------------------------|---|---|
| Permit | Emission Unit | Daily PE1 (lb PM ₁₀ /day) | Annual PE1 (lb PM ₁₀ /year) |
| C-948-10 | Storage Silos to Mixer | 0.1 | 52 |
| | Mixing and Weighing | 3.5 | 1,292 |
| | Mixer Loadout | 0.0 | 17 |
| | Total | 3.6 | 1,361 |

2. Post Project Potential to Emit (PE2)

C-948-7

Crushing

Daily PE2 = 2,769 tons/day x 0.0012 lb/ton
= 3.3 lb-PM₁₀/day

Annual PE2 = 2,769 tons/day x 0.0012 lb/ton x 365 days/year
= 1,213 lb-PM₁₀/year

Cullet Screening Box

Daily PE2 = 650 tons/day x 0.00074 lb/ton
= 0.5

Annual PE2 = 650 tons/day x 0.00074 lb/ton x 365 days/year
= 176 lb-PM₁₀/year

Belt Conveyor

Daily PE2 = 650 tons/day x 0.000046 lb/ton
= 0.0

Annual PE2 = 650 tons/day x 0.000046 lb/ton x 365 days/year
= 11 lb-PM₁₀/year

| Post-Project Potential to Emit Summary | | | |
|---|---------------------------|---|---|
| Permit | Emission Unit | Daily PE2 (lb PM ₁₀ /day) | Annual PE2 (lb PM ₁₀ /year) |
| C-948-7 | Cullet Crushing Operation | 3.3 | 1,213 |
| | Cullet Screening Box | 0.5 | 176 |
| | Belt Conveyor | 0.0 | 11 |
| | Total | 3.8 | 1,400 |

C-948-10

Since there is no change in material throughput rates, control efficiency or emission factors from the pre-project, PE2 = PE1.

| Post-Project Potential to Emit Summary | | | |
|---|------------------------|---|---|
| Permit | Emission Unit | Daily PE2 (lb PM ₁₀ /day) | Annual PE2 (lb PM ₁₀ /year) |
| C-948-10 | Storage Silos to Mixer | 0.1 | 52 |
| | Mixing and Weighing | 3.5 | 1,292 |
| | Mixer Loadout | 0.0 | 17 |
| | Total | 3.6 | 1,361 |

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

Pursuant to District Rule 2201, the SSPE1 is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of Emission Reduction Credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions (AER) that have occurred at the source, and which have not been used on-site.

This facility does not have any ERCs. The SSPE1 is based on the PE values for the existing permit units as was most recently calculated in NSR project C-1171009 with the exceptions as noted:

| SSPE1 (lb/year) | | | | | |
|-----------------|------------------|-----------------|------------------|----------------|---------------|
| Permit Unit | NO _x | SO _x | PM ₁₀ | CO | VOC |
| S-948-2-4 | 978 | 0 | 69 | 214 | 78 |
| S-948-3-3 | 738 | 0 | 52 | 162 | 59 |
| S-948-4-5 | 0 | 0 | 429 | 0 | 0 |
| S-948-5-5 | 0 | 0 | 429 | 0 | 0 |
| S-948-6-9 | 0 | 0 | 1,261 | 0 | 0 |
| S-948-7-7* | 0 | 0 | 2,457 | 0 | 0 |
| S-948-8-7 | 0 | 0 | 420 | 0 | 0 |
| S-948-9-6 | 0 | 0 | 1 | 0 | 0 |
| S-948-10-12* | 0 | 0 | 1,361 | 0 | 0 |
| S-948-11-17 | 1,186,250 | 372,300 | 164,688 | 185,099 | 13,228 |
| S-948-14-6 | 0 | 0 | 6,026 | 0 | 0 |
| S-948-15-3 | 0 | 0 | 0 | 0 | 0 |
| S-948-17-6 | 0 | 0 | 511 | 0 | 0 |
| S-948-18-5 | 74 | 0 | 7 | 135 | 2 |
| S-948-21-3** | 0 | 0 | 3,295 | 0 | 0 |
| S-948-22-3 | 1,490 | 10 | 7 | 135 | 2 |
| S-948-23-3 | 65 | 0 | 5 | 14 | 5 |
| S-948-24-3 | 177 | 0 | 13 | 39 | 14 |
| S-948-25-3 | 177 | 0 | 13 | 39 | 14 |
| S-948-28-3 | 12 | 1 | 23 | 155 | 12 |
| S-948-29-2 | 0 | 0 | 0 | 0 | 11,475 |
| S-948-30-3 | 0 | 0 | 136 | 0 | 0 |
| S-948-34-0 | 46 | 0 | 0 | 6 | 3 |
| S-948-35-0*** | 107 | 0 | 6 | 52 | 9 |
| SSPE1 | 1,190,114 | 372,311 | 181,209 | 186,050 | 24,901 |

* Calculated in Section VII.C.1 above.

** Calculated in Project S-1172438 (finalized January 24, 2018)

*** Calculated in Project S-1173453 (finalized March 7, 2018)

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

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

The only change in emissions is due to the reduced material processed in the crusher listed in permit C-948-7 since there is no change in emissions for C-948-10. The change in emissions is summarized in the table below:

| SSPE2 (lb/year) | | | | | |
|-----------------|------------------|-----------------|------------------|----------------|---------------|
| Permit Unit | NO _x | SO _x | PM ₁₀ | CO | VOC |
| SSPE1 | 1,190,114 | 372,311 | 181,209 | 186,050 | 24,901 |
| C-948-7-7 | 0 | 0 | -2,457 | 0 | 0 |
| C-948-7-8 | 0 | 0 | 1,400 | 0 | 0 |
| SSPE2 | 1,190,114 | 372,311 | 180,152 | 186,050 | 24,901 |

5. Major Source Determination

Rule 2201 Major Source Determination:

Pursuant to District Rule 2201, a Major Source is a stationary source with a SSPE2 equal to or exceeding one or more of the following threshold values. For the purposes of determining major source status the following shall not be included:

- any ERCs associated with the stationary source
- Emissions from non-road IC engines (i.e. IC engines at a particular site at the facility for less than 12 months)
- Fugitive emissions, except for the specific source categories specified in 40 CFR 51.165

| Rule 2201 Major Source Determination (lb/year) | | | | | | |
|---|-----------------|-----------------|------------------|-------------------|---------|--------|
| | NO _x | SO _x | PM ₁₀ | PM _{2.5} | CO | VOC |
| SSPE1 | 1,190,114 | 372,311 | 181,209 | 181,209 | 186,050 | 24,901 |
| SSPE2 | 1,190,114 | 372,311 | 180,152 | 180,152 | 186,050 | 24,901 |
| Major Source Threshold | 20,000 | 140,000 | 140,000 | 140,000 | 200,000 | 20,000 |
| Major Source? | Yes | Yes | Yes | Yes | No | Yes |

Note: PM2.5 assumed to be equal to PM10

As seen in the table above, the facility is an existing Major Source for NO_x, SO_x, PM₁₀, PM_{2.5} and VOC and will remain a Major Source for NO_x, SO_x, PM₁₀, PM_{2.5} and VOC as a result of this project.

Rule 2410 Major Source Determination:

The facility or the equipment evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21 (b)(1)(iii). Therefore the PSD Major Source threshold is 250 tpy for any regulated NSR pollutant.

| PSD Major Source Determination (tons/year) | | | | | | |
|---|-----------------|-----|-----------------|-----|-----|------------------|
| | NO ₂ | VOC | SO ₂ | CO | PM | PM ₁₀ |
| Estimated Facility PE before Project Increase | 595 | 13 | 186 | 93 | 91 | 91 |
| PSD Major Source Thresholds | 250 | 250 | 250 | 250 | 250 | 250 |
| PSD Major Source? | Yes | No | No | No | No | No |

As shown above, the facility is an existing PSD major source for at least one pollutant.

6. Baseline Emissions (BE)

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

Pursuant to District Rule 2201, BE = PE1 for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, located at a Major Source.

otherwise,

BE = Historic Actual Emissions (HAE), calculated pursuant to District Rule 2201.

C-948-7 and -10:

a. BE PM₁₀

Clean Emissions Units, Located at a Major Source

Pursuant to Rule 2201, a Clean Emissions Unit is defined as an emissions unit that is “equipped with an emissions control technology with a minimum control efficiency of at least 95% or is equipped with emission control technology that meets the requirements

for achieved-in-practice BACT as accepted by the APCO during the five years immediately prior to the submission of the complete application.

As stated in Section VI above, all emission points are controlled by dust collectors with a 99% control efficiency; therefore, these permits can be classified as Clean Emissions Units.

Therefore BE=PE1.

| Pre-Project Potential to Emit Summary | | |
|--|---------------------------|--------------------------------------|
| Permit | Emission Unit | Annual PE1 (lb PM10/year) |
| C-948-7 | Cullet Crushing Operation | 2,270 |
| | Cullet Screening Box | 176 |
| | Belt Conveyor | 11 |
| | Total | 2,457 |
| C-948-10 | Storage Silos to Mixer | 52 |
| | Mixing and Weighing | 1,292 |
| | Mixer Loadout | 17 |
| | Total | 1,361 |

7. SB 288 Major Modification

SB 288 Major Modification is defined in 40 CFR Part 51.165 as "any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act."

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

| SB 288 Major Modification Thresholds | | | |
|---|----------------------------------|--------------------------------|--|
| Pollutant | Project PE2 (lb/year) | Threshold (lb/year) | SB 288 Major Modification Calculation Required? |
| PM10 | 1,400 + 1,361 = 2,761 | 30,000 | No |

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

8. Federal Major Modification

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

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

Step 1

For new emissions units, the increase in emissions is equal to the PE2 for each new unit included in this project.

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

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

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

PM10 is the only pollutant of concern in this project. As a worst case scenario, assuming that the PAE = PE2 for both units = (1,400 + 1,361) lb-PM10/year = 2,761 lb-PM10/year, the BAE = 0 and the UBC = 0, the project's combined total emission increases are compared to the Federal Major Modification Thresholds in the following table.

| Federal Major Modification Thresholds for Emission Increases | | | |
|---|--|---------------------------|------------------------------------|
| Pollutant | Total Emissions Increases (lb/yr) | Thresholds (lb/yr) | Federal Major Modification? |
| PM10 | 2,761 | 30,000 | No |
| PM2.5 | 2,761 | 20,000 | No |

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

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

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

- PM
- PM10

I. Project Location Relative to Class 1 Area

As demonstrated in the “PSD Major Source Determination” Section above, the facility was determined to be a existing PSD Major Source. Because the project is not located within 10 km (6.2 miles) of a Class 1 area – modeling of the emission increase is not required to determine if the project is subject to the requirements of Rule 2410.

II. Project Emission Increase – Significance Determination

a. Evaluation of Calculated Post-project Potential to Emit for New or Modified Emissions Units vs PSD Significant Emission Increase Thresholds

As a screening tool, the post-project potential to emit from all new and modified units is compared to the PSD significant emission increase thresholds, and if the total potentials to emit from all new and modified units are below the applicable thresholds, no further PSD analysis is needed.

| PSD Significant Emission Increase Determination: Potential to Emit (tons/year) | | | | | |
|---|-----------------------|-----------------------|-----------|-----------|------------------------|
| | NO₂ | SO₂ | CO | PM | PM₁₀ |
| Total PE from New and Modified Units | 0 | 0 | 0 | 1.4 | 1.4 |
| PSD Significant Emission Increase Thresholds | 40 | 40 | 100 | 25 | 15 |
| PSD Significant Emission Increase? | N | N | N | N | N |

As demonstrated above, because the post-project total potentials to emit from all new and modified emission units are below the PSD significant emission increase thresholds, this project is not subject to the requirements of Rule 2410 and no further discussion is required.

Rule 2201 New and Modified Stationary Source Review Rule

A. Best Available Control Technology (BACT)

1. BACT Applicability

Pursuant to District Rule 2201, Section 4.1, BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis. Unless specifically exempted by Rule 2201, BACT shall be required for the following actions*:

- a. Any new emissions unit with a potential to emit exceeding two pounds per day,
- b. The relocation from one Stationary Source to another of an existing emissions unit with a potential to emit exceeding two pounds per day,

- c. Modifications to an existing emissions unit with a valid Permit to Operate resulting in an Adjusted Increase in Permitted Emissions (AIPE) exceeding two pounds per day, and/or
- d. Any new or modified emissions unit, in a stationary source project, which results in an SB 288 Major Modification or a Federal Major Modification, as defined by the rule.

*Except for CO emissions from a new or modified emissions unit at a Stationary Source with an SSPE2 of less than 200,000 pounds per year of CO.

a. New emissions units – PE > 2 lb/day

As discussed in Section I above, there are no new emissions units associated with this project. Therefore BACT for new units with PE > 2 lb/day purposes is not triggered.

b. Relocation of emissions units – PE > 2 lb/day

As discussed in Section I above, there are no emissions units being relocated from one stationary source to another; therefore BACT is not triggered.

c. Modification of emissions units – AIPE > 2 lb/day

$$\text{AIPE} = \text{PE}_2 - \text{HAPE}$$

Where,

AIPE = Adjusted Increase in Permitted Emissions, (lb/day)

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

HAPE = Historically Adjusted Potential to Emit, (lb/day)

$$\text{HAPE} = \text{PE}_1 \times (\text{EF}_2/\text{EF}_1)$$

Where,

PE₁ = The emissions unit's PE prior to modification or relocation, (lb/day)

EF₂ = The emissions unit's permitted emission factor for the pollutant after modification or relocation. If EF₂ is greater than EF₁ then EF₂/EF₁ shall be set to 1

EF₁ = The emissions unit's permitted emission factor for the pollutant before the modification or relocation

AIPE = PE₂ – (PE₁ * (EF₂ / EF₁)). Since the EF₂ = EF₁ for both units and since PM₁₀ is the only pollutant of concern in this project, the calculations are as follows:

$$\text{AIPE}_{\text{Unit -7}} = 3.8 - [6.7 * (0.0012 + 0.00074 + 0.000046 / 0.01986)] = -2.9 \text{ lb-PM}_{10}/\text{day}$$

$$\text{AIPE}_{\text{Unit -10}} = 3.6 - [(3.6 * (0.0012 + 0.003 + 0.00004 / 0.00424))] = 0.0 \text{ lb-PM}_{10}/\text{day}$$

Since the AIPE is not greater than 2 lb/day, BACT is not triggered.

d. SB 288/Federal Major Modification

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

B. Offsets

1. Offset Applicability

Pursuant to District Rule 2201, Section 4.5, offset requirements shall be triggered on a pollutant by pollutant basis and shall be required if the SSPE2 equals or exceeds the offset threshold levels in Table 4-1 of Rule 2201.

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

| Offset Determination (lb/year) | | | | | |
|--------------------------------|-----------------|-----------------|------------------|---------|--------|
| | NO _x | SO _x | PM ₁₀ | CO | VOC |
| SSPE2 | 1,190,114 | 372,311 | 180,152 | 186,050 | 24,901 |
| Offset Thresholds | 20,000 | 54,750 | 29,200 | 200,000 | 20,000 |
| Offsets triggered? | Yes | Yes | Yes | No | Yes |

2. Quantity of Offsets Required

As seen above, the facility is an existing Major Source for NO_x, SO_x, PM₁₀, and VOC and the SSPE2 is greater than the offset thresholds. Therefore offset calculations will be required for this project.

Since this project only emits PM₁₀, offsets can potentially only be required for PM₁₀ emissions. The quantity of offsets in pounds per year for PM₁₀ is calculated as follows for sources with an SSPE1 greater than the offset threshold levels before implementing the project being evaluated.

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

Where,

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

BE = Baseline Emissions, (lb/year)

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

DOR = Distance Offset Ratio, determined pursuant to Section 4.8

BE = PE1 for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, Located at a Major Source.

otherwise,

BE = HAE

As calculated in Section VII.C.6 above, the BE from these units are equal to the PE1 since the units are Clean Emissions Units.

Also, there are no increases in cargo carrier emissions. Therefore offsets can be determined as follows:

Offsets Required (lb/year) = $([PE2_{Unit-7} - BE_{Unit-7}] + [PE2_{Unit-10} - BE_{Unit-10}] + ICCE) \times DOR$

C-948-7

PE2 = 1,400 lb-PM10/year
BE = PE1 = 2,457 lb-PM10/year
ICCE = 0 lb/year

C-948-10

PE2 = 1,361 lb-PM10/year
BE = PE1 = 1,361 lb-PM10/year
ICCE = 0 lb/year

Offsets Required (lb/year) = $([1,400 - 2,457] + [1,361 - 1,361] + ICCE) \times DOR$

Offsets Required (lb/year) = $(-1,057 + 0) \times DOR$
= 0 lb PM10/year

As demonstrated in the calculation above, the amount of offsets is zero. Therefore, offsets will not be required for this project.

C. Public Notification

1. Applicability

Pursuant to District Rule 2201, Section 5.4, public noticing is required for:

- a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications,
- b. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,
- c. Any project which results in the offset thresholds being surpassed,
- d. Any project with an SSIPE of greater than 20,000 lb/year for any pollutant, and/or
- e. Any project which results in a Title V significant permit modification

a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications

New Major Sources are new facilities, which are also Major Sources. Since this is not a new facility, public noticing is not required for this project for New Major Source purposes.

As demonstrated in Sections VII.C.7 and VII.C.8, this project does not constitute an SB 288 or Federal Major Modification; therefore, public noticing for SB 288 or Federal Major Modification purposes is not required.

b. PE > 100 lb/day

Applications which include a new emissions unit with a PE greater than 100 pounds during any one day for any pollutant will trigger public noticing requirements. There are no new emissions units associated with this project. Therefore public noticing is not required for this project for PE > 100 lb/day.

c. Offset Threshold

Pursuant to District Rule 2201, Section 4.5.3, offset requirements shall be triggered on a pollutant-by-pollutant basis, unless exempted pursuant to Section 4.6, offsets shall be required if the post-project Stationary Source Potential to Emit (SSPE2) equals or exceeds specific threshold levels.

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

| Offset Thresholds | | | | |
|-------------------|-----------------|-----------------|------------------|-------------------------|
| Pollutant | SSPE1 (lb/year) | SSPE2 (lb/year) | Offset Threshold | Public Notice Required? |
| NO _x | 1,190,114 | 1,190,114 | 20,000 lb/year | No |
| SO _x | 372,311 | 372,311 | 54,750 lb/year | No |
| PM ₁₀ | 181,209 | 180,152 | 29,200 lb/year | No |
| CO | 186,050 | 186,050 | 200,000 lb/year | No |
| VOC | 24,901 | 24,901 | 20,000 lb/year | No |

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

d. SSIPE > 20,000 lb/year

Public notification is required for any permitting action that results in a SSIPE of more than 20,000 lb/year of any affected pollutant. According to District policy, the SSIPE

= SSPE2 – SSPE1. The SSIPE is compared to the SSIPE Public Notice thresholds in the following table.

| SSIPE Public Notice Thresholds | | | | | |
|--------------------------------|-----------------|-----------------|-----------------|-------------------------------|-------------------------|
| Pollutant | SSPE2 (lb/year) | SSPE1 (lb/year) | SSIPE (lb/year) | SSIPE Public Notice Threshold | Public Notice Required? |
| NO _x | 1,190,114 | 1,190,114 | 0 | 20,000 lb/year | No |
| SO _x | 372,311 | 372,311 | 0 | 20,000 lb/year | No |
| PM ₁₀ | 180,152 | 181,209 | -1,057 | 20,000 lb/year | No |
| CO | 186,050 | 186,050 | 0 | 20,000 lb/year | No |
| VOC | 24,901 | 24,901 | 0 | 20,000 lb/year | No |

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

e. Title V Significant Permit Modification

As shown in the Discussion of Rule 2520 below, this project constitutes a Title V significant modification. Therefore, public noticing for Title V significant modifications is required for this project.

2. Public Notice Action

As discussed above, public noticing is required for this project for being a Title V Significant Modification. Therefore, public notice documents will be submitted to the California Air Resources Board (CARB), Environmental Protection Agency (EPA) and a public notice will be published in a local newspaper of general circulation prior to the issuance of the ATC for this equipment.

D. Daily Emission Limits (DELs)

DELs and other enforceable conditions are required by Rule 2201 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. The DEL must be contained in the latest ATC and contained in or enforced by the latest PTO and enforceable, in a practicable manner, on a daily basis. DELs are also required to enforce the applicability of BACT.

Proposed Rule 2201 (DEL) Conditions:

C-948-7

- Maximum daily amount of material throughput shall not exceed 2,769 tons per day. [District Rule 2201]
- PM10 emissions rate from the cullet crushing operation shall not exceed 0.0012 lb-PM10/ton-material. [District Rule 2201]

- PM10 emissions rate from the cullet screening box shall not exceed 0.00074 lb-PM10/ton-material. [District Rule 2201]
- PM10 emissions rate from the belt conveyor serving the cullet screening box shall not exceed 0.000046 lb-PM10/ton-material. [District Rule 2201]

C-948-10

- PM10 emissions from the transfer of materials from the storage silos to the mixer shall not exceed 0.00012 lb-PM10/ton-material. [District Rule 2201]
- PM10 emissions from mixing and weighing shall not exceed 0.003 lb-PM10/ton-material. [District Rule 2201]
- PM10 emissions from the mixer loadout shall not exceed 0.00004 lb-PM10/ton-material. [District Rule 2201]
- Maximum material throughput shall not exceed 1,180 tons per day. [District Rule 2201]

E. Compliance Assurance

1. Source Testing

As stated in District Policy APR 1705, non-combustion equipment served by a baghouse with expected PM10 emissions of 30 pounds per day or greater must be tested upon initial start-up. Units with PM10 emissions in excess of 70 pounds per day should also be tested on annual basis.

As shown in the calculation section above, all equipment have PM10 emissions below the above levels. Therefore, pursuant to District Policy APR 1705, source testing is not required to demonstrate compliance with Rule 2201.

2. Monitoring

Monitoring is required to demonstrate compliance with the offset, public notification and daily emission limit requirements of Rule 2201.

The following condition will be placed on the permits to ensure compliance with the applicable monitoring requirements:

C-948-7 & -10

- Differential operating pressure shall be monitored and recorded on each day that the dust collector operates. Upon detecting any excursion from the acceptable range pressure readings, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [District Rule 2201]

3. Recordkeeping

Recordkeeping is required to demonstrate compliance with the offset, public notification and daily emission limit requirements of Rule 2201. The following conditions are listed on the permits:

C-948-7 & -10

- Records of all maintenance of the baghouse, including all change outs of filter media, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2201]
- {1958} All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070]

4. Reporting

No reporting is required to demonstrate compliance with Rule 2201.

5. Other Rule 2201 (NSR) Requirements

The rest of the NSR requirements, including design/matrix specifications and maintenance and operation requirements, are included in the following permit conditions:

C-948-7

- Visible emissions from the baghouse shall not exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201]
- The baghouse shall be maintained and operated according to manufacturers' specifications. [District Rule 2201]
- All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]
- Material removed from the baghouse dust collector shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
- The cleaning frequency and duration for the baghouse shall be adjusted to optimize the control efficiency. [District Rule 2201]
- Replacement bags numbering at least 10% of the total number of bags in the baghouse dust collector shall be maintained on the premises. [District Rule 2201]
- The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201]
- The differential pressure gauge reading range for the baghouse shall be maintained between 0.5 and 9 inches of water column. [District Rule 2201]
- Baghouse dust collector filters shall be inspected annually while in operation for evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2201]

- Dust collector filters shall be inspected annually while not in operation for tears, scuffs, abrasions or holes which might interfere with the PM collection efficiency and shall be replaced as needed. [District Rule 2201]

C-948-10

- Visible emissions from each of the baghouse dust collectors shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rules 2201 and 4101]
- The baghouse dust collectors shall be maintained and operated according to manufacturers' specifications. [District Rule 2201]
- All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201]
- Material removed from the baghouse dust collectors shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201]
- Each baghouse dust collector's cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201]
- Replacement bags numbering at least 10% of the total number of bags in each baghouse dust collector shall be maintained on the premises. [District Rule 2201]
- The baghouse dust collectors shall each be equipped with a pressure differential gauge to indicate the pressure drop across the filters. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201]
- The Mixer Level Pangborn DC-6 baghouse dust collector shall operate at all times with a minimum differential pressure of 1 inch water column and a maximum differential pressure of 9 inches water column. [District Rule 2201]
- The Torit Down Flo-II baghouse shall operate at all times with a minimum differential pressure of 1 inches water column and a maximum differential pressure of 6 inches water column. [District Rule 2201]
- The Macprocess AVSC baghouse shall operate at all times with a minimum differential pressure of 1 inches water column and a maximum differential pressure of 7 inches water column. [District Rule 2201]
- Emissions shall be controlled by baghouse dust collectors: Torit Down Flo-II, MacProcess AVSC, and either Mixer Level Pangborn DC-6 or Trainshed Pangborn DC-2. [District Rule 2201]
- Baghouse dust collector filters shall be inspected annually while in operation for evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2201]
- Baghouse dust collector filters shall be inspected annually while not in operation for tears, scuffs, abrasions or holes which might interfere with the PM collection efficiency and shall be replaced as needed. [District Rule 2201]

Rule 2410 Prevention of Significant Deterioration

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

Rule 2520 Federally Mandated Operating Permits

This facility is subject to this Rule, and has received their Title V Operating Permit. A significant permit modification is defined as a "permit amendment that does not qualify as a minor permit modification or administrative amendment."

Minor permit modifications do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions. The monitoring will be changing from requiring a EPA Method 22 to be performed each day the units operate to not requiring EPA Method 22 at all, which is a relaxation in monitoring conditions. As a result, the proposed project constitutes a Significant Modification to the Title V Permit.

As discussed above, the facility has not applied for a Certificate of Conformity (COC); therefore, the facility must apply to modify their Title V permit with a significant modification, prior to operating with the proposed modifications. Continued compliance with this rule is expected. The facility shall not implement the changes requested until the final permit is issued.

Rule 4001 New Source Performance Standards (NSPS)

This rule incorporates NSPS from Part 60, Chapter 1, Title 40, Code of Federal Regulations (CFR); and applies to all new sources of air pollution and modifications of existing sources of air pollution listed in 40 CFR Part 60. However, no subparts of 40 CFR Part 60 apply to raw material handling or dust collection systems.

Rule 4002 National Emission Standards for Hazardous Air Pollutants (NESHAPs)

This rule incorporates NESHAPs from Part 61, Chapter I, Subchapter C, Title 40, CFR and the NESHAPs from Part 63, Chapter I, Subchapter C, Title 40, CFR; and applies to all sources of hazardous air pollution listed in 40 CFR Part 61 or 40 CFR Part 63. However, no subparts of 40 CFR Part 61 or 40 CFR Part 63 apply to raw material handling or dust collection systems.

Rule 4101 Visible Emissions

Rule 4101 states that no person shall discharge into the atmosphere emissions of any air contaminant aggregating more than 3 minutes in any hour which is as dark as or darker than Ringelmann 1 (or 20% opacity).

Pursuant to District Policy SSP 1005, visible emissions from operations served by dust collectors shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour.

The following condition will be placed on the permits to ensure compliance:

- Visible emissions from the baghouse dust collectors shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rules 2201 and 4101]

Rule 4102 Nuisance

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

California Health & Safety Code 41700 (Health Risk Assessment)

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

As demonstrated above, there are no increases in emissions associated with this project, therefore a health risk assessment is not necessary and no further risk analysis is required.

Rule 4201 Particulate Matter Concentration

Section 3.1 prohibits discharge of dust, fumes, or total particulate matter into the atmosphere from any single source operation in excess of 0.1 grain per dry standard cubic foot.

Since the current project does not involve any changes to the existing dust collectors and there is no increase in PM emissions, continued compliance with the requirements of this rule is expected from the existing dust collectors.

The following condition will be placed on the permits to ensure continued compliance:

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

Rule 4202 Particulate Matter – Emission Rate

This rule limits the allowable PM emission rate based on the equipment process weight rate. Section 3.1 defines the process weight as “the total weight of all materials introduced into any specific process, which process may cause any discharge into the atmosphere.”

Per section 4.1, particulate matter (PM) emissions from any source operation shall not exceed the allowable hourly emission rate (E) as calculated using the following applicable formulas:

$$E = 3.59 P^{0.62} \text{ (when, } P = \text{ process weight rate } \leq 30 \text{ tons/hr)}$$

$$E = 17.31 P^{0.16} \text{ (when, } P = \text{ process weight rate } > 30 \text{ tons/hr)}$$

C-948-7

The post-project process weight rate of the material handling operation is 115.4 tons/hr (2,769 tons/day)

$$\begin{aligned} \text{Hence } E &= 17.31 \times P^{0.16} \\ &= 37.0 \end{aligned}$$

The proposed hourly emission rate = 0.16 lb/hr (3.8 lb/day). Since the proposed emission rate is less than the rule limit, compliance with the rule is expected.

C-948-10

The post-project process weight rate of the material handling operation is 49.2 tons/hr (1,180 tons/day)

$$\begin{aligned} \text{Hence } E &= 17.31 \times P^{0.16} \\ &= 32.3 \end{aligned}$$

The proposed hourly emission rate = 0.15 lb/hr (3.6 lb/day). Since the proposed emission rate is less than the rule limit, compliance with the rule is expected.

California Health & Safety Code 42301.6 (School Notice)

The District has verified that this site is not located within 1,000 feet of a school. Therefore, pursuant to California Health and Safety Code 42301.6, a school notice is not required.

40 CFR Part 64, Compliance Assurance Monitoring (CAM)

Pursuant to Section 64.5(a)(2), the owner or operator shall submit the required information as part of a significant permit revision under Part 70 or 71 of this chapter. Since this project is a Significant Title V Modification, this subpart will be addressed.

Except for back-up utility units that are exempt under paragraph (b)(2), Section 64.2 states that the requirements of this subpart shall apply to a pollutant-specific emissions unit at a major source that is required to obtain a Part 70 or 71 permit if the unit satisfies all of the following criteria:

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

| Pollutant | Major Source Threshold (lb/year) |
|-------------------|---|
| VOC | 20,000 |
| NO _x | 20,000 |
| CO | 200,000 |
| PM _{2.5} | 140,000 |
| PM ₁₀ | 140,000 |
| SO _x | 140,000 |

These permits may be subject to CAM for PM10, as there are PM10 limits, and they do have add-on controls in the form of dust collectors.

C-948-7

(1) PM10 emissions are limited to 1,400 lb-PM10/year.

(2) The unit is equipped with a dust collector with a 99% control efficiency.

(3) Uncontrolled emissions:

$$\text{Annual Uncontrolled PE} = [1,400 \text{ lb-PM10/year} \div (1-0.99)]$$

$$\text{Annual Uncontrolled PE} = 140,000 \text{ lb-PM10/year}$$

As shown above, the uncontrolled PE for PM10 is not greater than the major source threshold of 140,000 lb/year. Therefore, this unit does not trigger CAM.

Therefore, the following conditions which were added to the permit to satisfy CAM will be removed:

- Visible emissions from the cullet crushing operation shall be evaluated using EPA Method 22 for a period of at least 6 minutes at least once during each day the crusher operates. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions prior to further loading. Corrective action shall eliminate visible emissions before next loading event. The results of inspection shall be kept in a record and shall be made available to the District upon request. [District Rule 2520 and 40 CFR part 64]
- If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR part 64.8. [40 CFR Part 64]

Additionally, the following conditions will be revised to remove the reference to 40 CFR Part 64:

- Visible emissions from the baghouse shall not exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201 and ~~40 CFR Part 64~~]
- The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201 and ~~40 CFR Part 64~~]
- The differential pressure gauge reading range for the baghouse shall be maintained between 0.5 and 9 inches of water column. [District Rule 2201 and ~~40 CFR Part 64~~]
- Differential operating pressure for the baghouse shall be monitored and recorded on each day that the baghouse operates. Upon detecting any excursion from the acceptable range pressure readings, the permittee shall investigate the excursion and

take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [District Rule 2201 and ~~40 CFR part 64~~]

C-948-10

(1) PM10 emissions are limited to 1,361 lb-PM10/year.

(2) The unit is equipped with a dust collector with a 99% control efficiency.

(3) Uncontrolled emissions:

$$\text{Annual Uncontrolled PE} = [1,361 \text{ lb-PM10/year} \div (1-0.99)]$$

$$\text{Annual Uncontrolled PE} = 136,100 \text{ lb-PM10/year}$$

As shown above, the uncontrolled PE for PM10 is not greater than the major source threshold of 140,000 lb/year. Therefore, this unit does not trigger CAM.

Therefore, the following conditions which were added to the permit to satisfy CAM will be removed:

- Visible emissions from the baghouse dust collectors shall be checked using EPA Method 22 for a period of at least 6 minutes at least once during each day while in operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. Corrective action shall eliminate visible emissions within 24 hours. [District Rule 2201 and 40 CFR Part 64]
- The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR Part 64]
- The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR Part 64]
- If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR part 64.8. [40 CFR Part 64]

Additionally, the following conditions will be revised to remove the reference to 40 CFR Part 64:

- The baghouse dust collectors shall each be equipped with a pressure differential gauge to indicate the pressure drop across the filters. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201 and ~~40 CFR Part 64~~]
- The Mixer Level Pangborn DC-6 baghouse dust collector shall operate at all times with a minimum differential pressure of 1 inch water column and a maximum differential pressure of 9 inches water column. [District Rule 2201 and ~~40 CFR Part 64~~]
- The Torit Down Flo-II baghouse shall operate at all times with a minimum differential pressure of 1 inch water column and a maximum differential pressure of 6 inches water column. [District Rule 2201 and ~~40 CFR Part 64~~]

- The differential pressure gauge reading range for the Macprocess AVS/AVSC baghouse dust collector shall be established per manufacturer's recommendation at the time of start-up inspection. [~~District Rule 2201 and 40 CFR Part 64~~]
- Differential operating pressures shall be monitored and recorded on each day that the baghouse dust collectors operate. Upon detecting any excursion from the acceptable range pressure readings, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [~~District Rule 2201 and 40 CFR Part 64~~]

Since these units are no longer subject to this subpart, no further discussion is required.

California Environmental Quality Act (CEQA)

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

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities;
- Identify the ways that environmental damage can be avoided or significantly reduced;
- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

Greenhouse Gas (GHG) Significance Determination

It is determined that no other agency has or will prepare an environmental review document for the project. Thus the District is the Lead Agency for this project. This project will not result in an increase in project specific greenhouse gas emissions. The District therefore concludes that the project would have a less than cumulatively significant impact on global climate change.

District CEQA Findings

The District is the Lead Agency for this project because there is no other agency with broader statutory authority over this project. The District performed an Engineering Evaluation (this document) for the proposed project and determined that for each emissions unit affected by the project the potential project emission increase is equal to or less than 2 lbs per day per pollutant. Therefore, the potential project emission increase is considerably below all annual criteria emissions CEQA significant thresholds. The activity will occur at an existing facility and involves negligible expansion of the existing use. Furthermore, the District determined that the activity will not have a significant effect on the environment. Therefore, the District finds that the activity is categorically exempt

from the provisions of CEQA pursuant to CEQA Guideline § 15301 (Existing Facilities), and finds that the project is exempt per the general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment (CEQA Guidelines §15061(b)(3)).

Indemnification Agreement/Letter of Credit Determination

According to District Policy APR 2010 (CEQA Implementation Policy), when the District is the Lead or Responsible Agency for CEQA purposes, an indemnification agreement and/or a letter of credit may be required. The decision to require an indemnity agreement and/or a letter of credit is based on a case-by-case analysis of a particular project's potential for litigation risk, which in turn may be based on a project's potential to generate public concern, its potential for significant impacts, and the project proponent's ability to pay for the costs of litigation without a letter of credit, among other factors.

The criteria pollutant emissions and toxic air contaminant emissions associated with the proposed project are not significant, and there is minimal potential for public concern for this particular type of facility/operation. Therefore, an Indemnification Agreement and/or a Letter of Credit will not be required for this project in the absence of expressed public concern.

IX. Recommendation

Compliance with all applicable rules and regulations is expected. Pending a successful NSR Public Noticing and EPA review period, issue ATCs C-948-7-8 & -10-13 subject to the permit conditions on the attached draft ATCs in **Appendix B**.

X. Billing Information

| Annual Permit Fees | | | |
|---------------------------|---------------------|------------------------|-------------------|
| Permit Number | Fee Schedule | Fee Description | Annual Fee |
| C-948-7-8 | 3020-05-F | 517,000 gallons | \$346 |
| C-948-10-13 | 3020-01-E | 200 hp electric motors | \$473 |

Appendixes

- A: Current PTOs and ATC to be Implemented
- B: Draft ATCs
- C: Quarterly Net Emissions Change
- D: Compliance Certification

APPENDIX A
Current PTOs and ATC to be Implemented

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-948-7-7

EXPIRATION DATE: 02/28/2022

EQUIPMENT DESCRIPTION:

517,000 GALLON CULLET STORAGE SILO #4 AND CULLET CRUSHING OPERATION WITH CULLET CRUSHER, CULLET ELEVATOR SERVED BY A PANGBORN CORPORATION BAGHOUSE FABRIC COLLECTOR #DC-5, SERIAL #42-CH3-6656, AND CULLET SCREENING BOX

PERMIT UNIT REQUIREMENTS

1. Visible emissions from the baghouse shall not exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The baghouse shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The cleaning frequency and duration for the baghouse shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Replacement bags numbering at least 10% of the total number of bags in the baghouse shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
9. The differential pressure gauge reading range for the baghouse shall be maintained between 0.5 and 9 inches of water column. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
10. Differential operating pressure for the baghouse shall be monitored and recorded on each day that the baghouse operates. Upon detecting any excursion from the acceptable range pressure readings, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [District Rule 2201 and 40 CFR part 64] Federally Enforceable Through Title V Permit
11. Maximum daily amount of material throughput shall not exceed 5,183 tons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
12. PM10 emissions rate from the cullet crushing operation shall not exceed 0.0012 lb-PM10/ton-material. [District Rule 2201] Federally Enforceable Through Title V Permit
13. PM10 emissions rate from the cullet screening box shall not exceed 0.00074 lb-PM10/ton-material. [District Rule 2201]

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

14. PM10 emissions rate from the belt conveyor serving the cullet screening box shall not exceed 0.000046 lb-PM10/ton-material. [District Rule 2201]
15. Dust collector filters shall be inspected annually while in operation for evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
16. Dust collector filters shall be inspected annually while not in operation for tears, scuffs, abrasions or holes which might interfere with the PM collection efficiency and shall be replaced as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
17. Records of dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2520] Federally Enforceable Through Title V Permit
18. Visible emissions from the cullet crushing operation shall be evaluated using EPA Method 22 for a period of at least 6 minutes at least once during each day the crusher operates. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions prior to further loading. Corrective action shall eliminate visible emissions before next loading event. The results of inspection shall be kept in a record and shall be made available to the District upon request. [District Rule 2520 and 40 CFR part 64] Federally Enforceable Through Title V Permit
19. Records of all maintenance of the baghouse, including all change outs of filter media, shall be maintained. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Permittee shall maintain daily records of material throughput and shall make such records available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit
21. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR part 64.8. [40 CFR Part 64]
22. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4201, Fresno County Rule 404, District Rule 4202 and Fresno County Rule 405. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: C-948-10-9

EXPIRATION DATE: 02/28/2022

EQUIPMENT DESCRIPTION:

SILO UNLOADING AND MIXING OPERATION INCLUDING BATCH GATHERING BELT SERVED BY PANGBORN CORP DC-6 BAGHOUSE DUST COLLECTOR (SN 63-CH3-6671) SHARED WITH PERMIT UNIT '6 OR DC-2 BAGHOUSE DUST COLLECTOR (SN 67 CH3-6664) UNDER PERMIT UNIT '6, AND A BATCH ELEVATOR, TOTALIZING SCALE, AND GLASS MASTER TURBIN MODEL 12000 MIXER SERVED BY A TORIT DOWN FLO-II MODEL #DFT-2-4 BAGHOUSE DUST COLLECTOR

PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Visible emissions from each the baghouse dust collectors shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rules 2201 and 4101 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
3. The baghouse dust collectors shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
4. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
5. Material removed from baghouse dust collectors shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
6. The baghouse dust collectors cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
7. Replacement bags numbering at least 10% of the total number of bags in each baghouse dust collector shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The baghouse dust collectors shall each be equipped with a pressure differential gauge to indicate the pressure drop across the filters. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
9. The Mixer Level Pangborn DC-6 baghouse dust collector shall operate at all times with a minimum differential pressure of 1 inch water column and a maximum differential pressure of 9 inches water column. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
10. The Torit Down Flo-II baghouse shall operate at all times with a minimum differential pressure of 1 inch water column and a maximum differential pressure of 6 inches water column. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
11. Differential operating pressure shall be monitored and recorded on each day that the baghouse dust collectors operate. Upon detecting any excursion from the acceptable range pressure readings, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit

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

12. Emissions shall be controlled by a baghouse dust collector: either Mixer Level Pangborn DC-6, Train Shed Pangborn DC-2, or Torit Down Flo-II. [District Rule 2201] Federally Enforceable Through Title V Permit
13. PM10 emissions from the transfer of materials from the storage silos to the mixer shall not exceed 0.00025 lb/ton of material throughput. [District Rule 2201] Federally Enforceable Through Title V Permit
14. PM10 emissions from mixing and weighing shall not exceed 0.006 pound per ton of material throughput. [District Rule 2201] Federally Enforceable Through Title V Permit
15. PM10 emissions from the mixer loadout shall not exceed 0.0014 pound per ton of material throughput. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Maximum throughput shall not exceed 1,180 tons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Baghouse dust collector filters shall be inspected annually while in operation for evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
18. Baghouse dust collector filters shall be inspected annually while not in operation for tears, scuffs, abrasions or holes which might interfere with the PM collection efficiency and shall be replaced as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
19. Records of baghouse dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
20. Visible emissions from the baghouse dust collectors shall be checked using EPA Method 22 for a period of at least 6 minutes at least once during each day while in operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. Corrective action shall eliminate visible emissions within 24 hours. [District Rule 2520 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
21. Permittee shall maintain daily records of the material throughput and such records shall be made available for District inspection upon request. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
22. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR Part 64]
23. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR Part 64]
24. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR part 64.8. [40 CFR Part 64]
25. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4201, Fresno County Rule 404, District Rule 4202 and Fresno County Rule 405. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

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



AUTHORITY TO CONSTRUCT

PERMIT NO: C-948-10-12

ISSUANCE DATE: 01/24/2018

LEGAL OWNER OR OPERATOR: VITRO FLAT GLASS LLC
MAILING ADDRESS: 3333 S PEACH AVE
FRESNO, CA 93725

LOCATION: 3333 S PEACH AVE
FRESNO, CA 93725

EQUIPMENT DESCRIPTION:

MODIFICATION OF SILO UNLOADING AND MIXING OPERATION INCLUDING BATCH GATHERING BELT SERVED BY PANGBORN CORP DC-6 BAGHOUSE DUST COLLECTOR (SN 63-CH3-6671) SHARED WITH PERMIT UNIT '6 OR DC-2 BAGHOUSE DUST COLLECTOR (SN 67 CH3-6664) UNDER PERMIT UNIT '6, AND A BATCH ELEVATOR, TOTALIZING SCALE, AND GLASS MASTER TURBIN MODEL 12000 MIXER SERVED BY A TORIT DOWN FLO-II MODEL #DFT-2-4 BAGHOUSE DUST COLLECTOR: ADD ONE MACPROCESS MODEL AVS/AVSC DUST COLLECTOR DEDICATED TO SAND WEIGH-OUT AND DISCHARGE ONTO BATCH GATHERING BELT

CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. Visible emissions from each of the baghouse dust collectors shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rules 2201 and 4101] Federally Enforceable Through Title V Permit
4. The baghouse dust collectors shall be maintained and operated according to manufacturers' specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
5. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
6. Material removed from the baghouse dust collectors shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Seyed Sadredin, Executive Director / APCO


Arnaud Marjollet, Director of Permit Services
C-948-10-12 Jan 24 2018 1:21PM - AIYABEU Joint Inspection NOT Required

7. Each baghouse dust collector's cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Replacement bags numbering at least 10% of the total number of bags in each baghouse dust collector shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
9. The baghouse dust collectors shall each be equipped with a pressure differential gauge to indicate the pressure drop across the filters. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
10. The Mixer Level Pangborn DC-6 baghouse dust collector shall operate at all times with a minimum differential pressure of 1 inch water column and a maximum differential pressure of 9 inches water column. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
11. The Torit Down Flo-II baghouse shall operate at all times with a minimum differential pressure of 1 inch water column and a maximum differential pressure of 6 inches water column. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
12. The differential pressure gauge reading range for the Macprocess AVS/AVSC baghouse dust collector shall be established per manufacturer's recommendation at the time of start-up inspection. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
13. Differential operating pressures shall be monitored and recorded on each day that the baghouse dust collectors operate. Upon detecting any excursion from the acceptable range pressure readings, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
14. Emissions shall be controlled by a baghouse dust collector: Macprocess AVS/AVSC, and either Mixer Level Pangborn DC-6, Trainshed Pangborn DC-2, or Torit Down Flo-II. [District Rule 2201] Federally Enforceable Through Title V Permit
15. PM10 emissions from the transfer of materials from the storage silos to the mixer shall not exceed 0.00025 lb/ton of material throughput. [District Rule 2201] Federally Enforceable Through Title V Permit
16. PM10 emissions from mixing and weighing shall not exceed 0.006 pound per ton of material throughput. [District Rule 2201] Federally Enforceable Through Title V Permit
17. PM10 emissions from the mixer loadout shall not exceed 0.0014 pound per ton of material throughput. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Maximum material throughput shall not exceed 1,180 tons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Baghouse dust collector filters shall be inspected annually while in operation for evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Baghouse dust collector filters shall be inspected annually while not in operation for tears, scuffs, abrasions or holes which might interfere with the PM collection efficiency and shall be replaced as needed. [District Rule 2201] Federally Enforceable Through Title V Permit
21. Records of baghouse dust collector maintenance, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2201] Federally Enforceable Through Title V Permit
22. Visible emissions from the baghouse dust collectors shall be checked using EPA Method 22 for a period of at least 6 minutes at least once during each day while in operation. If visible emissions are observed, corrective action shall be taken to eliminate visible emissions. Corrective action shall eliminate visible emissions within 24 hours. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
23. Permittee shall maintain daily records of the material throughput and such records shall be made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
24. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR part 64.7. [40 CFR Part 64] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

25. The permittee shall comply with the recordkeeping and reporting requirements of 40 CFR part 64.9. [40 CFR Part 64] Federally Enforceable Through Title V Permit
26. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
27. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4201, Fresno County Rule 404, District Rule 4202 and Fresno County Rule 405. A permit shield is granted from these requirements. [District Rule 2520] Federally Enforceable Through Title V Permit

APPENDIX B
Draft ATCs

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: C-948-7-8

LEGAL OWNER OR OPERATOR: VITRO FLAT GLASS LLC
MAILING ADDRESS: 3333 S PEACH AVE
FRESNO, CA 93725

LOCATION: 3333 S PEACH AVE
FRESNO, CA 93725

EQUIPMENT DESCRIPTION:

MODIFICATION OF 517,000 GALLON CULLET STORAGE SILO #4 AND CULLET CRUSHING OPERATION WITH CULLET CRUSHER, CULLET ELEVATOR SERVED BY A PANGBORN CORPORATION BAGHOUSE FABRIC COLLECTOR #DC-5, SERIAL #42-CH3-6656, AND CULLET SCREENING BOX: REDUCE THROUGHPUT OF CULLET CRUSHING OPERATION ALLOWING FOR THE REMOVAL OF COMPLIANCE ASSURANCE MONITORING (CAM) REQUIREMENTS

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. Visible emissions from the baghouse shall not exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rule 2201] Federally Enforceable Through Title V Permit
5. The baghouse shall be maintained and operated according to manufacturer's specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
6. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Samir Sheikh, Executive Director / APCO

DRAFT

Arnaud Marjolle, Director of Permit Services
C-948-7-8 Oct 10 2018 4:56PM - GARCIAJ - Joint Inspection NOT Required

7. Material removed from dust collector(s) shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
8. The cleaning frequency and duration for the baghouse shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Replacement bags numbering at least 10% of the total number of bags in the baghouse shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
10. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The differential pressure gauge reading range for the baghouse shall be maintained between 0.5 and 9 inches of water column. [District Rule 2201] Federally Enforceable Through Title V Permit
12. Differential operating pressure for the baghouse shall be monitored and recorded on each day that the baghouse operates. Upon detecting any excursion from the acceptable range pressure readings, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [District Rule 2201] Federally Enforceable Through Title V Permit
13. Maximum daily amount of material throughput shall not exceed 2,769 tons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
14. PM10 emissions rate from the cullet crushing operation shall not exceed 0.0012 lb-PM10/ton-material. [District Rule 2201] Federally Enforceable Through Title V Permit
15. PM10 emissions rate from the cullet screening box shall not exceed 0.00074 lb-PM10/ton-material. [District Rule 2201] Federally Enforceable Through Title V Permit
16. PM10 emissions rate from the belt conveyor serving the cullet screening box shall not exceed 0.000046 lb-PM10/ton-material. [District Rule 2201] Federally Enforceable Through Title V Permit
17. Dust collector filters shall be inspected annually while in operation for evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2201] Federally Enforceable Through Title V Permit
18. Dust collector filters shall be inspected annually while not in operation for tears, scuffs, abrasions or holes which might interfere with the PM collection efficiency and shall be replaced as needed. [District Rule 2201] Federally Enforceable Through Title V Permit
19. Records of all maintenance of the dust collector, including all change outs of filter media, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Permittee shall maintain daily records of material throughput and shall make such records available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
21. All records shall be retained for a period of at least 5 years and shall be made available for District inspection upon request. [District Rule 1070] Federally Enforceable Through Title V Permit
22. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4201, Fresno County Rule 404, District Rule 4202 and Fresno County Rule 405. A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

DRAFT

San Joaquin Valley
Air Pollution Control District

AUTHORITY TO CONSTRUCT

ISSUANCE DATE: DRAFT
DRAFT

PERMIT NO: C-948-10-13

LEGAL OWNER OR OPERATOR: VITRO FLAT GLASS LLC
MAILING ADDRESS: 3333 S PEACH AVE
FRESNO, CA 93725

LOCATION: 3333 S PEACH AVE
FRESNO, CA 93725

EQUIPMENT DESCRIPTION:

MODIFICATION OF SILO UNLOADING AND MIXING OPERATION INCLUDING BATCH GATHERING BELT SERVED BY MACPROCESS MODEL AVS/AVSC DUST COLLECTOR, PANGBORN CORP DC-6 BAGHOUSE DUST COLLECTOR (SN 63-CH3-6671) SHARED WITH PERMIT UNIT '-6 OR DC-2 BAGHOUSE DUST COLLECTOR (SN 67 CH3-6664) UNDER PERMIT UNIT '-6, AND A BATCH ELEVATOR, TOTALIZING SCALE, AND GLASS MASTER TURBIN MODEL 12000 MIXER SERVED BY A TORIT DOWN FLO-II MODEL #DFT-2-4 BAGHOUSE DUST COLLECTOR: UPDATE THE PM10 EMISSION FACTORS ALLOWING FOR THE REMOVAL OF COMPLIANCE ASSURANCE MONITORING (CAM) REQUIREMENTS

CONDITIONS

1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
3. Authority to Construct (ATC) C-948-10-12 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this ATC. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
5. Visible emissions from each of the baghouse dust collectors shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rules 2201 and 4101] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU **MUST** NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Samir Sheikh, Executive Director / APCO

DRAFT

Arnaud Marjolle, Director of Permit Services
C-948-10-13, Oct 10 2018 4:56PM - GARCIAJ Joint Inspection NOT Required

6. The baghouse dust collectors shall be maintained and operated according to manufacturers' specifications. [District Rule 2201] Federally Enforceable Through Title V Permit
7. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
8. Material removed from the baghouse dust collectors shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
9. Each baghouse dust collector's cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
10. Replacement bags numbering at least 10% of the total number of bags in each baghouse dust collector shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
11. The baghouse dust collectors shall each be equipped with a pressure differential gauge to indicate the pressure drop across the filters. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rule 2201 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
12. The Mixer Level Pangborn DC-6 baghouse dust collector shall operate at all times with a minimum differential pressure of 1 inch water column and a maximum differential pressure of 9 inches water column. [District Rule 2201] Federally Enforceable Through Title V Permit
13. The Torit Down Flo-II baghouse shall operate at all times with a minimum differential pressure of 1 inch water column and a maximum differential pressure of 6 inches water column. [District Rule 2201] Federally Enforceable Through Title V Permit
14. The Macprocess AVSC baghouse shall operate at all times with a minimum differential pressure of 1 inches water column and a maximum differential pressure of 7 inches water column. [District Rule 2201] Federally Enforceable Through Title V Permit
15. Differential operating pressures shall be monitored and recorded on each day that the baghouse dust collectors operate. Upon detecting any excursion from the acceptable range pressure readings, the permittee shall investigate the excursion and take corrective action to minimize excessive emissions and prevent recurrence of the excursion as expeditiously as practicable. [District Rule 2201] Federally Enforceable Through Title V Permit
16. Emissions shall be controlled by baghouse dust collectors: Torit Down Flo-II, MacProcess AVSC, and either Mixer Level Pangborn DC-6 or Trainshed Pangborn DC-2. [District Rule 2201] Federally Enforceable Through Title V Permit
17. PM10 emissions from the transfer of materials from the storage silos to the mixer shall not exceed 0.00012 lb-PM10/ton-material. [District Rule 2201] Federally Enforceable Through Title V Permit
18. PM10 emissions from mixing and weighing shall not exceed 0.003 lb-PM10/ton-material. [District Rule 2201] Federally Enforceable Through Title V Permit
19. PM10 emissions from the mixer loadout shall not exceed 0.00004 lb-PM10/ton-material. [District Rule 2201] Federally Enforceable Through Title V Permit
20. Maximum material throughput shall not exceed 1,180 tons per day. [District Rule 2201] Federally Enforceable Through Title V Permit
21. Baghouse dust collector filters shall be inspected annually while in operation for evidence of particulate matter leaks and shall be replaced as needed. [District Rule 2201] Federally Enforceable Through Title V Permit
22. Baghouse dust collector filters shall be inspected annually while not in operation for tears, scuffs, abrasions or holes which might interfere with the PM collection efficiency and shall be replaced as needed. [District Rule 2201] Federally Enforceable Through Title V Permit
23. Records of all maintenance of the baghouse, including all change outs of filter media, inspections, and repair shall be maintained. The records shall include identification of the equipment, date of inspection, corrective action taken, and identification of the individual performing the inspection. [District Rule 2201] Federally Enforceable Through Title V Permit

24. Permittee shall maintain daily records of the material throughput and such records shall be made available for District inspection upon request. [District Rule 2201] Federally Enforceable Through Title V Permit
25. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4201, Fresno County Rule 404, District Rule 4202 and Fresno County Rule 405. A permit shield is granted from these requirements. [District Rule 2520] Federally Enforceable Through Title V Permit

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APPENDIX C
Quarterly Net Emissions Change

Quarterly Net Emissions Change (QNEC)

The Quarterly Net Emissions Change is used to complete the emission profile screen for the District's PAS database. The QNEC shall be calculated as follows:

QNEC = PE2 - PE1, where:

QNEC = Quarterly Net Emissions Change for each emissions unit, lb/qtr.

PE2 = Post Project Potential to Emit for each emissions unit, lb/qtr.

PE1 = Pre-Project Potential to Emit for each emissions unit, lb/qtr.

| Quarterly NEC [QNEC] for C-948-7 | | | |
|----------------------------------|--------------|--------------|---------------|
| Pollutant | PE2 (lb/qtr) | PE1 (lb/qtr) | QNEC (lb/qtr) |
| PM ₁₀ | 350.00 | 614.25 | -264.25 |

| Quarterly NEC [QNEC] for C-948-10 | | | |
|-----------------------------------|--------------|--------------|---------------|
| Pollutant | PE2 (lb/qtr) | PE1 (lb/qtr) | QNEC (lb/qtr) |
| PM ₁₀ | 340.25 | 340.25 | 0.00 |

APPENDIX D
Compliance Certification



San Joaquin Valley Air Pollution Control District



TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I. TYPE OF PERMIT ACTION (Check appropriate box)

ADMINISTRATIVE AMENDMENT MINOR MODIFICATION SIGNIFICANT MODIFICATION

| | |
|--|--------------------|
| COMPANY NAME: Vitro Flat Glass LLC | FACILITY ID: C-948 |
| 1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility | |
| 2. Owner's Name: Vitro Flat Glass LLC | |
| 3. Agent to the Owner: Wendy F Garcia | |

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

- HC* Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- HC* Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- HC* Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- HC* Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true, accurate, and complete.
- HC* For minor modifications, this application meets the criteria for use of minor permit modification procedures pursuant to District Rule 2520.

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

Glen Collins
 Signature of Responsible Official

9/10/2018
 Date

Glen Collins
 Name of Responsible Official (please print)

Plant Superintendent
 Title of Responsible Official (please print)