

October 5, 2021

Laura Yannayon
US EPA Pacific Southwest, Region 9
75 Hawthorne St.
San Francisco, CA

RE: Notice of Final Action - Model General Permit: Air Curtain Incinerators
Project Number: C-1202499

Dear Ms. Yannayon:

The Air Pollution Control Officer has issued the Model General Permit for Air Curtain Incinerators that will be located at a stationary source. Enclosed is the Model General Permit and a copy of the notice of final action that has been posted on the District's website (www.valleyair.org).

Notice of the District's preliminary decision to issue the Model General Permit for Air Curtain Incinerators that will be located at a stationary source was posted on July 14, 2020. The District's analysis of the proposal was also emailed to CARB and EPA on July 14, 2020. No comments were received following the District's preliminary decision on this project.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Nick Peirce at (209) 557-6400.

Sincerely,



Brian Clements
Director of Permit Services

BC:JH

Enclosures

cc: Courtney Graham, CARB (w/ enclosure) via email

Samir Sheikh
Executive Director/Air Pollution Control Officer

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4800 Enterprise Way
Modesto, CA 95356-8718
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Central Region (Main Office)
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34946 Flyover Court
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San Joaquin Valley *Air Pollution Control District*

PERMIT UNIT: C-9803-1-0

EXPIRATION DATE:

EQUIPMENT DESCRIPTION:

TV MODEL GENERAL PERMIT FOR AIR CURTAIN INCINERATOR LOCATED AT A STATIONARY SOURCE MEETING THE FOLLOWING CRITERIA: 1. SUBJECT TO 40 CFR 60 SUBPART CCCC OR EEEE, 2. COMBUST LESS THAN 250 TONS OF MATERIAL IN ANY ONE DAY, 3. HANDLE NO MORE THAN 5 TONS OF WOOD ASH IN ANY ONE DAY, 4. COMBUST 100% WOOD WASTE OR 100% CLEAN LUMBER, OR A MIXTURE OF 100% WOOD WASTE, 100% CLEAN LUMBER, AND/OR YARD WASTE, 5. COMBUSTION IS STARTED WITH A PROPANE OR BUTANE TORCH, DRIPTORCH, OR FLARE. NO ACCELERANT IS USED (GASOLINE, KEROSENE, DIESEL, OR OTHER FUEL), 6. IF EQUIPPED WITH AN INTERNAL COMBUSTION ENGINE, THE MAXIMUM CONTINUOUS HORSEPOWER RATING IS LESS THAN OR EQUAL TO 50 BHP, 7. ENGINE WAS PREVIOUSLY ISSUED AN ATC AND DISTRICT PTO AND IS OPERATED AT AN EXISTING STATIONARY SOURCE

PERMIT UNIT REQUIREMENTS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. Particulate matter emissions from the air curtain incinerator shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
3. Particulate matter emissions from the air curtain incinerator shall not exceed the hourly rate as calculated in District Rule 4202 using the equation $E=3.59 \times P^{0.62}$ if P is less than or equal to 30 tons per hour. [District Rule 2201] Federally Enforceable Through Title V Permit
4. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to enter the permittee's premises where a permitted source is located or emissions related activity is conducted, or where records must be kept under condition of the permit. [District Rules 1070 and 2520] Federally Enforceable Through Title V Permit
5. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. [District Rules 1070 and 2520] Federally Enforceable Through Title V Permit
6. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit. [District Rule 2520, 9.13.2.3] Federally Enforceable Through Title V Permit
7. Upon presentation of appropriate credentials, a permittee shall allow an authorized representative of the District to sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [District Rule 2520, 9.13.2.4] Federally Enforceable Through Title V Permit
8. When a term is not defined in a Title V permit condition, the definition in the rule cited as the origin and authority for the condition in a Title V permits shall apply. [District Rule 2520, 9.1.1] Federally Enforceable Through Title V Permit
9. Operation under this Permit to Operate shall not be transferred unless a new application is filed with and approved by the District. [District Rule 2031] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

10. The permittee must comply with all conditions of the permit including permit revisions originated by the District. All terms and conditions of a permit that are required pursuant to the Clean Air Act (CAA), including provisions to limit potential to emit, are enforceable by the EPA and Citizens under the CAA. Any permit noncompliance constitutes a violation of the CAA and the District Rules and Regulations, and is grounds for enforcement action, for permit termination, revocation, reopening and reissuance, or modification; or for denial of a permit renewal application. [District Rules 2070, 7.0; 2080; and 2520, 9.8.1 and 9.13.1] Federally Enforceable Through Title V Permit
11. Any person building, altering or replacing any operation, article, machine, equipment, or other contrivance, the use of which may cause the issuance of air contaminants or the use of which may eliminate, reduce, or control the issuance of air contaminants, shall first obtain an Authority to Construct (ATC) from the District unless exempted by District Rule 2020 (12/20/07). [District Rule 2010, 3.0 and 4.0; and 2020] Federally Enforceable Through Title V Permit
12. Every application for a permit required under Rule 2010 (12/17/92) shall be filed in a manner and form prescribed by the District. [District Rule 2040] Federally Enforceable Through Title V Permit
13. The owner or operator shall notify the District of any breakdown condition as soon as reasonably possible, but no later than one hour after its detection, unless the owner or operator demonstrates to the District's satisfaction that the longer reporting period was necessary. [District Rule 1100, 6.1; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
14. The District shall be notified in writing within ten days following the correction of any breakdown condition. The breakdown notification shall include a description of the equipment malfunction or failure, the date and cause of the initial failure, the estimated emissions in excess of those allowed, and the methods utilized to restore normal operations. [District Rule 1100, 7.0; County Rules 110 (Fresno, Stanislaus, San Joaquin); 109 (Merced); 113 (Madera); and 111 (Kern, Tulare, Kings)] Federally Enforceable Through Title V Permit
15. The air curtain incinerator shall be operated according to manufacturer's specifications and in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 2520] Federally Enforceable Through Title V Permit
16. Only 100% wood waste, or 100% clean lumber, or a 100% mixture of wood waste, clean lumber, and/or yard waste shall be combusted in the air curtain incinerator. [40 CFR 60.2245 and 60.2974] Federally Enforceable Through Title V Permit
17. The maximum quantity of material combusted in the air curtain incinerator shall not exceed 30 tons in any one hour and 250 tons in any one day. [District Rule 2520] Federally Enforceable Through Title V Permit
18. The maximum quantity of wood ash handled shall not exceed 5 tons in any one day. [District Rule 2520] Federally Enforceable Through Title V Permit
19. Wood ash removed from the firebox shall be handled, stored, and disposed of in a manner minimizing entrainment into the atmosphere. [District Rule 2520] Federally Enforceable Through Title V Permit
20. For conducting a cold start, the operator shall use a propane or butane torch, driptorch, or flare to ignite the material inside the air curtain incinerator. No accelerants (e.g. gasoline, diesel fuel, kerosene, turpentine) may be used. [District Rule 2520] Federally Enforceable Through Title V Permit
21. Emissions (in units of pounds per ton of material combusted) from the air curtain incinerator shall not exceed any of the following limits: 1.0 lb-NO_x/ton, 0.1 lb-SO_x/ton, 1.1 lb-PM₁₀/ton, 2.6 lb-CO/ton, or 1.1 lb-VOC/ton. [District Rule 2520] Federally Enforceable Through Title V Permit
22. Emissions from wood ash handling and storage shall not exceed 0.46 lb-PM₁₀/ton. [District Rule 2520] Federally Enforceable Through Title V Permit
23. During the startup period that is within the first 30 minutes of operation, visible emissions from the air curtain incinerator shall not equal or exceed Ringelmann 1 or 20% opacity for more than 3 minutes in any one hour. [District Rules 4001 and 4101, 40 CFR 60.2250 and 60.2971] Federally Enforceable Through Title V Permit
24. After the startup period, during steady state operation, visible emissions from the air curtain incinerator shall not equal or exceed either of the following limits: Ringelmann 1 or 20% opacity for more than 3 minutes in any one hour or 10% opacity as determined by the average of three 1-hour blocks consisting of ten 6-minute average opacity values [District Rules 4001 and 4101, 40 CFR 60.2250 and 60.2971] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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25. The operator shall conduct periodic testing for opacity at least once every 12 calendar months. Opacity testing shall consist of one 30-minute cold start observation, and three 1-hour observations under normal steady state operation. [District Rules 1081 and 4001, 40 CFR 60.2255 and 60.2972] Federally Enforceable Through Title V Permit
26. Compliance with the opacity limits on this permit shall be determined by EPA Method 9. [District Rules 4001 and 4101, 40 CFR 60.2255 and 60.2972] Federally Enforceable Through Title V Permit
27. Observers for the opacity compliance demonstration shall be certified according to the procedure in EPA Method 9. [District Rules 4001 and 4101, 40 CFR 60.2255 and 60.2972] Federally Enforceable Through Title V Permit
28. Opacity testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance opacity testing and an opacity test plan must be submitted for approval at least 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
29. Opacity observations shall be made at the point of greatest opacity in that portion of the plume where condensed water vapor is not present. [District Rule 1081] Federally Enforceable Through Title V Permit
30. The permittee shall submit to the District the opacity test results report in paper or electronic format within 60 days of completion of the field test. The opacity results shall include information regarding the charge rate during opacity observation. [District Rules 1081 and 4001, 40 CFR 60.2260 and 60.2973] Federally Enforceable Through Title V Permit
31. The operator shall keep records of all initial and annual opacity test results and reports onsite in either paper copy or electronic format for at least 5 years. [District Rules 1070, 2520, and 4001, 40 CFR 60.2260] Federally Enforceable Through Title V Permit
32. The permittee shall maintain hourly and daily records of the tons of material burned in the air curtain incinerator. [District Rule 2520] Federally Enforceable Through Title V Permit
33. The operator shall maintain records of required monitoring that include: 1) the date, place, and time of sampling or measurement; 2) the date(s) analyses were performed; 3) the company or entity that performed the analysis; 4) the analytical techniques or methods used; 5) the results of such analysis; and 6) the operating conditions at the time of sampling or measurement. [District Rule 2520, 9.4.1] Federally Enforceable Through Title V Permit
34. The operator shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, or report. Support information includes copies of all reports required by the permit and, for continuous monitoring instrumentation, all calibration and maintenance records and all original strip-chart recordings. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
35. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 1070, 2520, and 4001, 40 CFR 60.2260] Federally Enforceable Through Title V Permit
36. The reporting periods for the Report of Required Monitoring and the Compliance Certification Report begin June 1 of every year, unless alternative dates are approved by the District Compliance Division. These reports are due within 30 days after the end of the reporting period. [District Rule 2520] Federally Enforceable Through Title V Permit
37. Deviations from permit conditions must be promptly reported, including deviations attributable to upset conditions, as defined in the permit. For the purpose of this condition, promptly means as soon as reasonably possible, but no later than 10 days after detection. The report shall include the probable cause of such deviations, and any corrective actions or preventive measures taken. All required reports must be certified by a responsible official consistent with section 10.0 of District Rule 2520 (6/21/01). [District Rules 2520, 9.5.2 and 1100, 7.0] Federally Enforceable Through Title V Permit
38. With each report or document submitted under a permit requirement or a request for information by the District or EPA, the permittee shall include a certification of truth, accuracy, and completeness by a responsible official. [District Rule 2520, 9.13.1 and 10.0] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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

39. The permittee shall submit certifications of compliance with the terms and standards contained in Title V permits, including emission limits, standards and work practices, to the District and the EPA annually (or more frequently as specified in an applicable requirement or as specified by the District). The certification shall include the identification of each permit term or condition, the compliance status, whether compliance was continuous or intermittent, the methods used for determining the compliance status, and any other facts required by the District to determine the compliance status of the source. [District Rule 2520, 9.16] Federally Enforceable Through Title V Permit
40. The operator shall submit reports of any required monitoring at least every six months unless a different frequency is required by an applicable requirement. All instances of deviations from permit requirements must be clearly identified in such reports. [District Rule 2520, 9.5.1] Federally Enforceable Through Title V Permit
41. If for any reason a permit requirement or condition is being challenged for its constitutionality or validity by a court of competent jurisdiction, the outcome of such challenge shall not affect or invalidate the remainder of the conditions or requirements in that permit. [District Rule 2520, 9.7] Federally Enforceable Through Title V Permit
42. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. [District Rule 2520, 9.8.2] Federally Enforceable Through Title V Permit
43. The permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition. [District Rule 2520, 9.8.3] Federally Enforceable Through Title V Permit
44. The permit does not convey any property rights of any sort, or any exclusive privilege. [District Rule 2520, 9.8.4] Federally Enforceable Through Title V Permit
45. The Permittee shall furnish to the District, within a reasonable time, any information that the District may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to EPA along with a claim of confidentiality. [District Rule 2520, 9.8.5] Federally Enforceable Through Title V Permit
46. The permittee shall pay annual permit fees and other applicable fees as prescribed in Regulation III of the District Rules and Regulations. [District Rule 2520, 9.9] Federally Enforceable Through Title V Permit
47. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8021] Federally Enforceable Through Title V Permit
48. Outdoor handling, storage and transport of any bulk material which emits dust shall comply with the requirements of District Rule 8031, unless specifically exempted under Section 4.0 of Rule 8031 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8031] Federally Enforceable Through Title V Permit
49. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8041] Federally Enforceable Through Title V Permit
50. Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8051] Federally Enforceable Through Title V Permit
51. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 (8/19/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8061] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

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52. Any unpaved vehicle/equipment area that anticipates more than 50 Average annual daily Trips (AADT) shall comply with the requirements of Section 5.1.1 of District Rule 8071. Any unpaved vehicle/equipment area that anticipates more than 150 vehicle trips per day (VDT) shall comply with the requirements of Section 5.1.2 of District Rule 8071. On each day that 25 or more VDT with 3 or more axles will occur on an unpaved vehicle/equipment traffic area, the owner/operator shall comply with the requirements of Section 5.1.3 of District Rule 8071. On each day when a special event will result in 1,000 or more vehicles that will travel/park on an unpaved area, the owner/operator shall comply with the requirements of Section 5.1.4 of District Rule 8071. All sources shall comply with the requirements of Section 5.0 of District Rule 8071 unless specifically exempted under Section 4.0 of Rule 8071 (9/16/2004) or Rule 8011 (8/19/2004). [District Rules 8011 and 8071] Federally Enforceable Through Title V Permit
53. No person shall manufacture, blend, repackage, supply, sell, solicit or apply any architectural coating with a VOC content in excess of the corresponding limit specified in Table of Standards 1 effective until 12/30/10 or Table of Standards 2 effective on and after 1/1/11 of District Rule 4601 (12/17/09) for use or sale within the District. [District Rule 4601, 5.1] Federally Enforceable Through Title V Permit
54. All VOC-containing materials subject to Rule 4601 (12/17/09) shall be stored in closed containers when not in use. [District Rule 4601, 5.4] Federally Enforceable Through Title V Permit
55. The permittee shall comply with all the Labeling and Test Methods requirements outlined in Rule 4601 sections 6.1 and 6.3 (12/17/09). [District Rule 4601, 6.1 and 6.3] Federally Enforceable Through Title V Permit
56. Any owner or operator of a demolition or renovation activity, as defined in 40 CFR 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR 61.145 (Standard for Demolition and Renovation). [40 CFR 61 Subpart M] Federally Enforceable Through Title V Permit

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