

**VENTURA COUNTY
AIR POLLUTION CONTROL DISTRICT**

669 County Square Drive
Ventura, CA 93003
805/645-1400

PART 70 PERMIT

Number 00036

Permit Term: April 1, 2016 to March 31, 2021

Company Name

LWFP, LLC
1112 E. Copeland Rd., Suite 500
Arlington, TX 76011

Facility Name / Address

Trinity ESC – Frazier Park
17410 East Lockwood Valley Road
Frazier Park, CA 93225

Responsible Officials

Mr. Cory Danner
VP of Operations
1112 E. Copeland Road, Suite 500
Arlington, TX 76011
817/635-8564

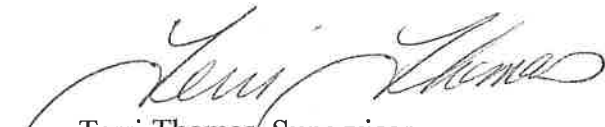
Title V Permit Contact

Mr. Matthew Hallmark
Director
1112 E. Copeland Rd., Suite 500
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Mr. Carl Campbell
President
817/635-8525

The Part 70 permit consists of this page and the tables, attachments and conditions listed in the attached table of contents. The Part 70 permit application is included for reference only and is not a part of the Part 70 permit.

Pursuant to Rule 33.1, the Part 70 permit shall also serve as a permit to operate issued to fulfill the requirements of Rule 10.B.


Terri Thomas, Supervisor
Engineering Division

For:

Michael Villegas
Air Pollution Control Officer

October 4, 2016

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Note: The Part 70 permit application is included for reference only and is not a part of the Part 70 permit.

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1.a. PERMIT REVISIONS TABLE

Application No.	Issue Date	Description	Revised Permit Sections
0036-161	09/20/00	<ul style="list-style-type: none"> ●Increase Natural Gas Throughput Limit / Minor Part 70 Permit Modification ●New Responsible Official / Administrative Amendment ●District revised permitted emissions to reflect the use of standard calculation methods / Administrative Amendment 	<ul style="list-style-type: none"> ●Signature Cover Page ●Table of Contents ●Permit Revisions Table ●Periodic Monitoring Summary ●Table No. 2 ●Table No. 3 ●Table No. 4 ●Attachment PO0036PC2 ●Attachment PO0036PC5
00036-151	01/16/02	<ul style="list-style-type: none"> ●Finished Product Material Handling Modifications / Minor Part 70 Permit Modification 	<ul style="list-style-type: none"> ●Signature Cover Page ●Table of Contents ●Permit Revisions Table ●Periodic Monitoring Summary ●Table No. 2 ●Table No. 3 ●Table No. 4 ●Attachment PO0036PC3 ●Attachment PO0036PC4 ●Attachment PO0036PC6 ●Attachment PO0036PC8
00036-191	07/15/03	<ul style="list-style-type: none"> ●Administrative Amendment to revise the mailing addresses for the Responsible Official and the Title V Contact 	<ul style="list-style-type: none"> ●Signature Cover Page ●Permit Revisions Table
00036-171 00036-181	09/13/04	<ul style="list-style-type: none"> ●Revised Annual Mass Emission Limits and NOx Hourly Limits / Significant Part 70 Permit Modification ●Permitted Lime Injection System / Minor Part 70 Permit Modification 	<ul style="list-style-type: none"> ●Signature Cover Page ●Table of Contents ●Stationary Source Description ●Permit Revisions Table ●Periodic Monitoring Summary ●Table No. 2 ●Table No. 3 ●Table No. 4 ●Attachment PO0036PC2 ●Attachment PO0036PC9 (new) ●Attachment 54.B.1-36 ●Attachment 54.B.2-36
00036-201 00036-211	03/01/06	Permit Reissuance for Term: March 1, 2006 to February 28, 2011 (-201) and new Responsible Official (-211)	See "Stationary Source Description"

Application No.	Date	Description	Revised Permit Sections
00036-221	02/21/07	Establish CAM Indicator values / Minor Part 70 Permit Modification	<ul style="list-style-type: none"> •Signature Cover Page •Permit Revisions Table •Permit Summary and Statement of Basis •Attachment PO00036PC3
00036-231	01/10/08	Permit NOx and CO CEMS / Minor Part 70 Permit Modification	<ul style="list-style-type: none"> •Signature Cover Page •Permit Revisions Table •Permit Summary and Statement of Basis •Periodic Monitoring Summary •Attachment PO00036PC2
00036-241	07/19/10	Permit Raw Material Baghouse and Raw Material Handling Equipment Changes / Minor Part 70 Permit Modification	<ul style="list-style-type: none"> •Signature Cover Page •Table of Contents •Permit Revisions Table •Permit Summary and Statement of Basis •Periodic Monitoring Summary •Table No. 2 •Table No. 3 •Table No. 4 •Attachment CFROOO 8.31.83 <i>replaces Attachment CFROOO</i> •Attachment CFROOO 4.22.08 <i>new</i> •Attachment PO00036PC4 •Attachment PO00036PC6 •Attachment PO00036PC10 •Attachment 55 <i>new</i>
00036-251 00036-261	04/01/11	App. 251 – Permit Portable Screening Plant App. 261 – Permit Reissuance	See “Permit Summary and Statement of Basis”
00036-271	08/23/12	Replace a Finished End Conveyor / Minor Part 70 Permit Modification	<ul style="list-style-type: none"> •Signature Cover Page •Permit Revisions Table •Table No. 2 •Table No. 3 •Table No. 4 •Attachment PO00036PC3
00036-281	04/25/13	Administrative Amendment – Transfer of Ownership	<ul style="list-style-type: none"> •Signature Cover Page •Permit Revisions Table

Application No.	Issue Date	Description	Revised Permit Sections
00036-291	12/17/14	Administrative Amendment – Company Address Change and Rule Revisions	<ul style="list-style-type: none"> •Signature Cover Page •Permit Revisions Table •Attachment PO00036PC9 •Rule 54.B.1-36 •Rule 54.B.2-36 •Rule 74.11.1
00036-301	05/14/15	Change Responsible Official Administrative Amendment	<ul style="list-style-type: none"> •Signature Cover Page •Permit Revision Table
00036-311	03/01/16	Permit Reissuance for Permit Period Ending March 31, 2021	See “Permit Summary and Statement of Basis”
00036-321 00036-331	10/04/16	App 321 – Replace Finished End Conveyor No. 29 App 331 – Permitting an additional Portable Screening Plant	<ul style="list-style-type: none"> •Signature Cover Page •Permit Revisions Table •Table No. 2 •Table No. 3 •Table No. 4 •Attachment PO00036PC8 •Attachment PO00036PC11

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1.b. PERMIT SUMMARY AND STATEMENT OF BASIS

Stationary Source Description

This stationary source is a manufacturing facility that produces lightweight aggregate for use in lightweight concrete used by the construction industry for pumped concrete and for building products such as concrete block and roof tile. The stationary source is owned by LWFP, LLC and the facility is named "Trinity ESC-Frazier Park."

The raw material used in this operation is sedimentary shale consisting primarily of montmorillonite, illite, and kaolin. This source has a Standard Industrial Classification (SIC) Code of 3295, Minerals and Earths, Ground or Otherwise Treated. Major equipment at the source includes screens, crushers, and conveyor belts for sizing, separation, and transport. The raw material is mixed with water and diesel fuel and extruded into sized "pellets". The diesel fuel additive is limited to Biodiesel (B100) or Diesel Fuel No. 2. These pellets are then heated in one of two rotary kilns to a temperature of approximately 1900 degrees Fahrenheit and then cooled with a water spray. Each kiln is equipped with a baghouse dust collector for particulate matter control. There are two additional baghouses: a "Raw Material Baghouse", which controls particulate from raw material handling processes prior to the kilns; and a "Finished End Baghouse", for control of particulate matter from processing of the product after it has been fired in the kilns. After final screening and sizing, the finished structural aggregate, known as "ESC" or expanded shale and clay, is sold to concrete companies for use in lightweight concrete. The stationary source also manufactures various other aggregate products, including drier products (0.55 to 3% moisture) that exit the coolers prior to the water spray described above.

This facility was in operation prior to the formation of the Ventura County Air Pollution Control District (District) in 1968. The facility obtained its first District permit in 1978 and its initial Part 70 permit was issued on October 1, 1999 for the time period October 1, 1999 to September 30, 2004. District Rule 33.6.A and Part 70 require that all Part 70 Permit be issued for a term of five years from the date of issuance by the District. District Rule 33.6.B requires the submittal of a Reissuance Application no more than 18 months prior to the expiration date and no less than 6 months prior to the expiration date of the current permit.

As discussed in more detail throughout this Permit Summary and Statement of Basis, this permit applies to emissions units that are required to have a permit to operate pursuant to District Rule 10, "Permits Required", and District Rule 23, "Exemptions from Permit". These emissions units are listed in Table No. 2 in Section No. 2 of this permit. However, as discussed below, some equipment that is exempt from permit pursuant to District Rule 23, "Exemptions from Permit", may be subject to District rules such as District Rule 50, "Opacity". This includes "Insignificant Activities" as listed in Section No. 5 of the permit. In addition, "Short Term Activities" as listed in Section No. 9 of the permit are subject to certain rules and regulations. This permit does not regulate or restrict the use of motor vehicles and mobile equipment such as cars, trucks, bulldozers, and forklifts, however, any smoke or dust emissions generated from the use of such

equipment is subject to District Rule 50, "Opacity". This permit does not shield the permittee from complying with any Federal, State, or District rule or regulation that is not specifically addressed in the permit or any rule or regulation that may come into effect during the term of the permit.

Stationary Source Emissions

In Ventura County, the Part 70 permit thresholds are 50 tons per year for ROC and NO_x and 100 tons per year for PM, SO_x, and CO as Ventura County has a "Serious" nonattainment classification for the federal ozone standard (Rule 33.B.2). This stationary source is subject to the Part 70 permit program based upon the potential to emit nitrogen oxides (NO_x) and carbon monoxide (CO) in excess of these thresholds as shown in Table No. 4 in Section No. 4 of this Permit to Operate. The purpose of this table is to document the permitted emissions of the criteria pollutants ROC, NO_x, PM, SO_x, and CO for this stationary source. District Rule 29, "Conditions on Permits", requires permitted emissions to be included on each Permit to Operate. District Rule 29 requires that annual permitted emissions be based on a 12 calendar month rolling period and be expressed in units of tons per year. Hourly permitted emissions are required to be expressed in units of pounds per hour. Permitted emissions for a stationary source are required to be determined by aggregating the permitted emissions for each emissions unit at the stationary source.

Criteria pollutant emissions (ROC, NO_x, PM, SO_x, and CO) result from the combustion of natural gas in the kilns. Particulate matter emissions (PM) result from the screening, crushing, and conveying of the raw material and finished product and from the heating of the pellets in the rotary kilns. The kilns also produce SO_x emissions from the sulfur in the raw material and from the diesel fuel that is added during the extrusion process.

This stationary source is not a major source of federal Hazardous Air Pollutants (HAPs). The source is well below the HAP major source levels of 10 tons per year of a single HAP or 25 tons per year of combined HAPs. As an area (non-major) source of hazardous air pollutants, there are no Maximum Achievable Control Technology (MACT) standards that apply to this facility. The Part 70 Permit re-issuance application includes a summary (in the units of pounds per year and pounds per hour) of pollutants that are subject to the State of California AB2588 Air Toxics "Hot Spot" Program. All HAPS are subject to "Hot Spots" reporting. The goal of the Air Toxics "Hot Spots" Information and Assessment Act of 1987 (California Health and Safety Code Section 44300) is to collect air toxics emission data, to identify facilities having localized adverse health impacts, to ascertain health risks, to notify nearby workers and residents of significant risks, and to reduce significant risks if they exist. Under state law, motor vehicles (on-road and off-road) are not subject to the "Hot Spots" program. This facility has been subject to the "Hot Spots" program since 1989. Based on the quantity of toxic air contaminants released from the facility as determined by source testing, material balance calculations, and other engineering estimates, the potency and toxicity of materials released, and the proximity to sensitive receptors, this facility has been classified as "intermediate level" for reporting purposes. The "Hot Spots" Program defines

emissions from intermediate level facilities as those unlikely to pose a significant health risk. As an intermediate facility, the stationary source is required to update their toxic emissions and other data every four years. A complete analysis is only required if there have been permitted emission increases. The most recent data submitted was for the calendar year 2003. Based on this 2003 data, the facility was again classified as intermediate level. The permittee submitted a toxics analysis in 2006 which cited no significant changes and a more recent toxics emissions summary has not been required. The reissuance application includes an air toxics summary report based on 2010 data.

The United States EPA has added greenhouse gases (GHGs) to the list of regulated air pollutants. As of January 2, 2011, EPA has required that GHGs be calculated for each Title V stationary source and included in the Part 70 Permit. However, in a Federal Register notice dated August 19, 2015, EPA ruled that GHG emissions alone cannot be used to determine Title V applicability. This ruling was based on the U.S. Supreme Court decision of June 23, 2015. Greenhouse gases are defined as the aggregate group of six greenhouse gases: carbon dioxide, nitrous oxide, methane, hydrofluorocarbons (by category), perfluorocarbons (by category), and sulfur hexafluoride. Carbon dioxide equivalent emissions (CO_{2e}) is the amount of greenhouse gases emitted relative to the global warming potential of each pollutant. The CO_{2e} potential to emit for this stationary source has been calculated to be 36,944 tons per year, as stated in the Title V Reissuance application. This calculation is based on the permitted annual combustion limits of natural gas, diesel fuel, and raw clay. This CO_{2e} potential to emit does not include insignificant activities or equipment exempt from permit pursuant to Rule 23, "Exemptions From Permit".

Major GHG-emitting sources, such as electricity generation and large stationary sources that emit more than 25,000 metric tons of carbon dioxide equivalent (MTCO_{2e}) per year, are required to comply with the California GHG Cap-and-Trade Program and the Mandatory Reporting of Greenhouse Gas Emissions (MRR). This stationary source is subject to the program. This program is regulated and implemented by the California Air Resources Board (CARB), and not the District. The reported data can be found on CARB's website.

Compliance History

Upon reissuance of this Part 70 permit, the facility was determined to be in compliance with all applicable requirements. For the time period January 1, 1996 to December 18, 2015, the facility received twenty-two (22) Notices of Violation (NOV) as detailed in the "NOV by Facility" history for Facility No. 00036 located at the end of this section of the Part 70 permit.

Equipment Description and Applicable Requirements - General

Applicable requirements for this stationary source are listed throughout the permit. The Table of Contents in the front of the permit summarizes the applicable requirements including the equipment specific requirements, the general applicable requirements, and the applicable requirements for short-term activities. Table No. 2 in Section No. 2 of this Permit to Operate

details the applicable requirements for specific emissions units at the facility. Permit conditions that enforce these requirements are listed in Section No. 6, "Specific Applicable Requirements" and Section No. 7, "Permit Specific Conditions" of this permit.

In addition to the emission unit specific requirements in Section No. 6 and Section No. 7, there are additional general requirements that may apply to the emissions units listed in this table, or to the stationary source as a whole. Furthermore, some general requirements may apply to emissions units or short-term activities not required to be specifically listed on the permit. These general requirements are contained in the following sections of the Permit: Section No. 8, "General Applicable Requirements"; Section No. 9, "General Requirements for Short-Term Activities"; Section No. 10, "General Permit Conditions"; and Section No. 11, "Miscellaneous Federal Program Conditions". A detailed applicability discussion and additional legal basis for the permit condition(s) is included with each attachment or set of permit conditions.

Equipment Description and Applicable Requirements – Rotary Kilns

This source operates two 36.1 MMBTU/Hr aggregate rotary kilns. In the past, these kilns had the operational flexibility to burn either natural gas or distillate fuel oil as a heat source. Now, each kiln is limited to natural gas combustion only. Each kiln is equipped with a baghouse dust collector for the control of particulate matter (PM) emissions. Each kiln is also equipped with a powdered lime injection system for the control of oxides of sulfur (SOx) emissions. The lime is pneumatically conveyed from a storage silo into the flame zone of each kiln.

Attachment PO00036PC2 in Section No. 7 of the permit limits the amount of natural gas consumed in the kilns and the instantaneous emissions of NOx and CO from the kilns. In order to demonstrate compliance with the natural gas consumption limit, the permittee is required to measure, record, and report the natural gas consumption. Condition No. 2 of Attachment PO00036PC2 contains short-term mass and concentration emission limits in the units of pounds per hour (lbs/hr) for NOx and parts per million (ppmv) for CO that act to enforce compliance with District Rule 26 and District Rule 68. There is no short-term mass or concentration limit for ROC as there is no applicable emission limitation under District, state, or federal rules and regulations at this time.

As required by District Rule 103, "Continuous Monitoring Systems", each kiln and baghouse combination is equipped with a Continuous Emission Monitoring (CEM) System for the monitoring of NOx and CO emissions. This CEM measures concentration in parts per million by volume (ppmv) and calculates the mass emission rate in pounds per hour (lb/hr). Relative accuracy testing, which is the conducting of reference method NOx and CO source tests and statistically comparing the results to the CEM system, is required every twelve (12) months. District Rule 103 requires that NOx and/or CO emission violations detected by the CEM system be reported in writing to the District within 96 hours of each occurrence and to the state within five (5) working days of each occurrence.

As discussed above, source testing has not been required for ROC as there is no short-term emission limit in District, state, or federal rules for this pollutant. Continuous emissions monitors for ROC, therefore, have not been required for this reason also. In any case, continuous emissions monitoring for low concentrations of ROC, such as in these rotary kilns, has not proven to be reliable or accurate.

Attachment PO00036PC3 in Section No. 7 of the permit has aggregate production limits and particulate matter (PM) emission limits that each kiln and baghouse combination must meet. These limits are based on District Rule 26, "New Source Review". Condition No. 1 limits the kilns to a combined aggregate production limit of 218,280 tons per year. The permittee is required to maintain daily records of the amount of material processed by each kiln and is required to report this information to the District on a monthly basis.

Condition No. 2 of Attachment PO00036PC3 contains a PM concentration limit for each baghouse of 0.2748 pounds of PM per ton of aggregate processed. Meeting this PM emission limit ensures that each baghouse will comply with District Rule 26, "New Source Review", District Rule 52, "Particulate Matter – Concentration (Grain Loading)" and District Rule 53, "Particulate Matter – Process Weight". In addition, Condition No. 4 of Attachment PO00036PC3 requires that each baghouse meet the limits of District Rule 50, "Opacity". In order to comply with the PM concentration limit, Condition No. 2 requires each baghouse to be tested every twelve (12) months using CARB Method 5. Even more important than source testing, Condition No. 5 contains daily, weekly, and quarterly periodic monitoring requirements to ensure that the baghouses are operating properly. This periodic monitoring includes daily checks for baghouse pressure drop and visible emissions greater than zero percent (0%). The permit requires that corrective action be taken within 24 hours if any deficiencies are noted by this baghouse periodic monitoring. A continuous emissions monitor that directly measures particulate matter emissions in terms of mass or weight has not been required because such monitors are not considered to be reliable or accurate.

In addition to the periodic monitoring discussed above, the two 36.1 MMBTU/Hr aggregate rotary kilns are subject to 40 CFR, Part 64, "Compliance Assurance Monitoring" (CAM) for particulate matter emissions that are controlled by the baghouses. Condition No. 8 of Attachment PO00036PC3 requires five (5) indicators of compliance to satisfy the CAM requirements as follows: (1) PM intensity as indicated by a bag leak detection system; (2) bag condition; (3) visible emissions; (4) baghouse pressure drop; and (5) baghouse temperature. Condition No. 8 requires PM source testing to establish operating ranges for these indicators of compliance that will correlate with the baghouse emission limit of 0.2748 pounds of PM per ton of aggregate processed. A failure to operate within the established ranges is considered to be an excursion. All excursions are required to be recorded and then reported to the District every six (6) months. The report is to include the number and duration of excursions, the type of excursion, the cause of the excursion (including unknown if applicable), and the corrective action taken.

As discussed above for CAM compliance, each baghouse is equipped with a BHA Group, Inc. Model CPM 750 baghouse leak detector and data recorder system. This "state of the art" device

measures particle flow using a beam of visible light through the baghouse exhaust. The rapid variation in light intensity is measured and reported in terms of "percentage of average light received". The bag leak detection data recording system is required to make a reading every 15 seconds and record average readings over 1 minute and 3 minute intervals whenever the kilns are in operation. An excursion is defined as the percentage of the average light received falling below the percentage level established during the required source test. Note that the baghouse leak detection system is very sensitive and is capable of detecting particulate matter emissions well before they exceed the visible emission limits of District Rule 50, "Opacity". In fact, the baghouse leak detector selected is far superior to an opacity monitor in that it can accurately measure much smaller levels of dust compared to an opacity monitor.

The ROC, NO_x, and CO emissions from the kilns are not subject to CAM as there is no associated emission control device for these pollutants. However, as discussed above as required by District Rule 103, a continuous emissions monitor will be required to measure the emissions of NO_x and CO. As discussed in more detail below, the SO_x emissions from the kilns are also not subject to CAM. The lime injection system that controls SO_x emissions is not subject to CAM because the kilns are each equipped with a continuous emission monitor (CEM) that directly measures SO_x emissions. Note that continuous emissions monitors are far superior to CAM as they directly measure emissions. The CAM program only requires measurement of surrogate parameters such as temperature or pressure drop and does not require direct measurement of emissions.

Attachment PO00036PC9 in Section No. 7 of the permit requires that each kiln and baghouse combination meet specified SO_x emission limits that are based on compliance with District Rule 26, "New Source Review" and District Rule 54, "Sulfur Compounds". As discussed above, sulfur compounds in the clay raw material, and diesel fuel added during the extrusion process, result in the emissions of SO_x. To meet these SO_x emission limits, each kiln is equipped with a powdered lime injection system for the control of these SO_x emissions. The lime is pneumatically conveyed from a storage silo into the flame zone of each kiln. As required by District Rule 103, "Continuous Monitoring Systems", each kiln and baghouse combination is equipped with a Continuous Emission Monitoring (CEM) System for the monitoring of SO_x emissions. This CEM measures concentration in parts per million by volume (ppmv), mass emission rate in pounds per hour (lb/hr), and mass emission rate in tons per year. Note that air dispersion modeling was performed to establish the pounds per hour mass emission limits in Condition No. 2 that ensure compliance with the ground level property line concentration limits of District Rule 54.B.2. The pounds per hour emission limits are more stringent than the concentration limit of District Rule 54.B.1.a (300 ppmv) in that in order to meet the pounds per hour limit (and the ground level property line concentration limits of District Rule 54.B.2) a SO_x emission concentration much lower than the District Rule 54.B.1.a limit at the point of discharge is necessary. Relative accuracy testing is required on these CEM systems every twelve (12) months. District Rule 103 requires that SO_x emission violations detected by the CEM be reported in writing to the District within 96 hours of each occurrence and to the state within five (5) working days of each occurrence. In addition, Condition No. 7 requires that the permittee provide the District real time access to the data recorded by CEM systems via modem.

Equipment Description and Applicable Requirements – Raw and Finished Material Handling

A number of screens, crushers, conveyors, and other ancillary equipment are used in the raw material and finished material sections of the facility. Although initial construction of this stationary source commenced prior to August 31, 1983, some equipment installed after this date has subjected this new equipment to the New Source Performance Standards (NSPS) at 40 CFR Part 60, Subpart OOO, “Standards of Performance for Nonmetallic Mineral Processing Facilities”. The NSPS has been revised such that there are more stringent emission limitations and standards for equipment installed after April 22, 2008. The permit includes a set of permit conditions for material handling equipment installed after August 31, 1983 (Attachment 40CFROOO(8.31.83)) and before April 22, 2008 and another set of permit conditions for equipment installed after April 22, 2008 (Attachment 40CFROOO(4.22.08)). Table 2 of the permit designates which attachment applies to specific equipment.

Condition No. 1 of Attachment PO00036PC10 requires that specified sections of the raw material handling equipment (prior to the kilns) be equipped with a baghouse emission control system to comply with the requirements of District Rule 26, “New Source Review”. This baghouse is required to comply with District Rule 52, “Particulate Matter – Concentration (Grain Loading)” and District Rule 53, “Particulate Matter – Process Weight”. In addition, Condition No. 4 of Attachment PO00036PC10 requires that the baghouse meet the limits of District Rule 50, “Opacity”. In order to comply with the District Rule 52 and District Rule 53 limits, Condition No. 2 requires the baghouse to be tested every twelve (12) months using CARB Method 5. Condition No. 5 contains daily, weekly, and quarterly periodic monitoring requirements to ensure that the baghouses are operating properly. This periodic monitoring includes daily checks for baghouse pressure drop and visible emissions greater than zero percent (0%). Note that continuous emissions monitors that directly measure particulate matter emissions in terms of mass or weight are not considered to be reliable or accurate and have not been required. The “raw material” baghouse is not subject to CAM because the particulate matter emissions prior to control by the baghouse are less than the CAM threshold of 100 tons per year.

Condition No. 1 of Attachment PO00036PC8 requires that specified sections of the “finished end” be equipped with a baghouse emission control system to comply with the requirements of District Rule 26, “New Source Review”. This baghouse is required to comply with District Rule 52, “Particulate Matter – Concentration (Grain Loading)” and District Rule 53, “Particulate Matter – Process Weight”. In addition, Condition No. 4 of Attachment PO00036PC8 requires that the baghouse meet the limits of District Rule 50, “Opacity”. In order to comply with the District Rule 52 and District Rule 53 limits, Condition No. 2 requires the baghouse to be tested every twelve (12) months using CARB Method 5. Condition No. 5 contains daily, weekly, and quarterly periodic monitoring requirements to ensure that the baghouses are operating properly. This periodic monitoring includes daily checks for baghouse pressure drop and visible emissions greater than zero percent (0%). Note that continuous emissions monitors that directly measure particulate matter emissions in terms of mass or weight are not considered to be reliable or

accurate and have not been required. The “finished end” baghouse is not subject to CAM because the particulate matter emissions prior to control by the baghouse are less than the CAM threshold of 100 tons per year.

All of the equipment used for raw material and finished material handling must comply with District Rule 50, “Opacity”. In addition as discussed above, some of the newer equipment must comply with the New Source Performance Standards (NSPS) at 40 CFR Part 60, Subpart OOO, “Standards of Performance for Nonmetallic Mineral Processing Facilities”. Condition No. 3 of Attachment PO00036PC7 requires that the moisture content of the raw material and finished material be maintained as necessary to comply with the fugitive dust emission limits of NSPS “OOO” and District Rule 50.

Equipment Description and Applicable Requirements – Portable Screening Plant

The stationary source includes the use of a portable screening plant, which includes a receiving hopper, screen, and four conveyors. The plant will be used at various locations throughout the stationary source. BACT requirements for the plant are that it be powered by grid electricity only and that water sprays be utilized. The operating requirements for the plant are detailed in Attachment PO00036PC11.

Equipment Description and Applicable Requirements – Extruder

As discussed above, the raw material is mixed with water and diesel fuel and extruded into sized “pellets”. Condition No. 1 of Attachment PO00036PC7 limits the diesel fuel additive to Biodiesel (B100) or Diesel Fuel No. 2. These pellets are then heated in one of two rotary kilns to a temperature of approximately 1900 degrees Fahrenheit. Condition No. 2 of Attachment PO00036PC7 limits the volume of diesel fuel used to no more than 150,000 gallons per year in order to comply with District Rule 26, “New Source Review”.

Although already regulated by other state and federal regulations, Condition No. 1 also prohibits the addition of any material designated as hazardous waste or the addition of soils contaminated with petroleum based materials such as gasoline, diesel fuel, jet fuel, or lubricating oils, into the extrusion process or into the kilns.

Condition No. 5 of Attachment PO00036PC7 also contains a District Rule 26, “New Source Review”, limit for the sulfur content of the diesel of 15 parts per million by weight, which is more stringent than the District Rule 64, “Sulfur Content of Fuels”, limit of 0.5% by weight. The permittee is required to provide a monthly report to the District the details the amount of diesel fuel delivered to the facility for the extruders.

40 CFR Part 68, “Chemical Accident Prevention Provisions”

This stationary source has stated that 40 CFR Part 68, "Chemical Accident Prevention Provisions", is not an applicable requirement. The facility does not store any specified materials in sufficient quantities to make them subject to 40 CFR Part 68. Therefore, a federal Risk Management Plan, pursuant to section 112(r) of the federal Clean Air Act as amended, is not required.

Rule 50, Opacity

Attachment 50 in Section No. 8 of the permit implements and enforces District Rule 50, "Opacity". This rule and the attachment apply to all equipment listed in Table Nos. 2, 3 and 4 of the permit as well as fugitive dust emissions from all mining activities; truck loading, unloading, and transferring operations; paved and unpaved roads; disturbed surface areas; and all material storage piles. This attachment does not regulate or restrict the use of motor vehicles and mobile equipment such as cars, trucks, bulldozers, and forklifts, however, any smoke or dust emissions generated from the use of such equipment is subject to District Rule 50, "Opacity". The attachment requires compliance verifications on a quarterly basis. These quarterly formal surveys are to be submitted with the annual compliance certification. Condition No. 4 of Attachment 50 requires the implementation and maintenance of a District approved "Fugitive Dust Reduction Plan" to demonstrate compliance with District Rule 50. This "Fugitive Dust Reduction Plan" is to be approved and implemented by July 1, 2006. This "Fugitive Dust Reduction Plan" shall include, but not be limited to, watering, the use of dust suppressants, the use of rumble grates or gravel pads to minimize track out material, and the use of posted speed limits on unpaved haul roads. The "Fugitive Dust Reduction Plan" includes monitoring, recordkeeping and reporting requirements to verify that it is being implemented.

Monitoring, Recordkeeping, and Reporting Requirements

The Periodic Monitoring Summary in Section No. 1 of the Permit to Operate summarizes the monitoring, recordkeeping, and reporting required by the various District rules, permit attachments and permit conditions. A number of key operating and compliance parameters are required to be monitored and recorded, and then reported to the District every six (6) months. These parameters include, but are not limited to, natural gas consumption in the kilns; amount of clay processed in the kilns; amount of diesel used in the extrusion process; amount of lime used in the kiln SOx emission control system; excursions defined by the kiln baghouse CAM plan; and violations of the SOx emission limits as measured by the continuous emissions monitor. In addition, various other compliance verification data is required to be submitted with the annual compliance certification.

The Part 70 Permit also includes monitoring, recordkeeping, and reporting requirements pursuant to the January 12, 2004 Settlement Agreement of Ventura County Superior Court Case No. 213707 People of the State of California vs. Pacific Custom Materials, Inc. et al. These requirements are District enforceable only, and not federally enforceable, as they are not required by District rules and regulations that are in the District's state implementation plan (SIP).

Summary of Permit Reissuance Changes

This Part 70 Permit has been reissued for the period March 1, 2006 to February 28, 2011, pursuant to Reissuance Application No. 00036-201 (submitted April 2, 2004). The following items summarize the changes from the current Part 70 Permit No. 00036 (effective October 1, 1999 to September 30, 2004) dated September 13, 2004:

- 40 CFR Part 64, “Compliance Assurance Monitoring”, requirements for the aggregate rotary kilns have been added to the permit (see Attachment PO00036PC3).
- Requirements of the Ventura County Superior Court Case No. 213707 January 12, 2004 Settlement Agreement have been added to the permit (see Attachments PO00036PC3, PO00036PC5, and PO00036PC9).
- The permit has been modified to clarify that only Biodiesel or Diesel Fuel No. 2 may be used as an additive in the extrusion process (see Attachment PO00036PC5).
- A permit attachment detailing the applicable requirements of District Rule 74.11.1, “Large Water Heaters and Small Boilers”, has been added to the permit. At this time however, the facility does not have any equipment subject to this rule and the rule will apply to the future installation of any equipment subject to the rule.
- Permit Condition No. 1 of Attachment PO00036PC1 that requires recordkeeping for solvent cleaning activities has been revised to reflect the November 11, 2003 revisions to District Rule 23, “Exemptions from Permit”.
- District Rule 57, “Combustion Contaminants”, requirements have been removed from Section No. 8 of the permit (Generally Applicable Requirements). District Rule 57 was revised and renamed as “Incinerators” on January 11, 2005 and no longer applies to the operations at this facility. New District Rule 57.1, “Particulate Matter Emissions From Fuel Burning Equipment”, adopted on January 11, 2005, also does not apply to the operations at this facility. The kilns are exempt from District Rule 57.1 based on the exemption of District Rule 57.1.C.4 for exhaust streams containing particulate matter that was not generated by the combustion of fuel. The exhaust from the kilns contains particulate matter from the raw material and injected powdered lime. The kiln exhaust is subject to District Rule 52 and District Rule 53 as described in Permit Attachment PO00036PC3 in Section No. 7 of the permit.
- District Rule 68, “Carbon Monoxide”, requirements have been removed from Section No. 8 of the permit (Generally Applicable Requirements) and placed in Attachment PO00036PC2 of Section No. 7 (Permit Specific Requirements) of the permit. This action was based on the April 13, 2004 revisions to District Rule 68.

- The following District rules have been revised and/or revisions of the rule have been adopted into the State Implementation Plan (SIP) since the initial issuance of Part 70 Permit No. 00036:
 - a) Rule 50, “Opacity”
 - b) Rule 52, “Particulate Matter – Concentration – (Grain Loading)”
 - c) Rule 53, “Particulate Matter – Process Weight”
 - d) Rule 54, “Sulfur Compounds”
 - e) Rule 64, “Sulfur Content of Fuels”
 - f) Rule 68, “Carbon Monoxide”
 - g) Rule 74.2, “Architectural Coatings”
 - h) Rule 74.6, “Surface Cleaning and Degreasing”
 - i) Rule 74.29, “Soil Decontamination Operations”

An earlier version of the proposed Part 70 permit was mailed to EPA Region IX on January 6, 2005 and a public notice regarding the proposed permit was published in three (3) local newspapers in January 2005 and March 2005. In addition, a public hearing on the proposed permit was conducted on April 21, 2005. This new version of the proposed permit includes significant revisions based on comments received from the public, Pacific Custom Materials, Inc., and District staff. The following list details the significant revisions to the first proposed permit:

- Stationary Source Description The Stationary Source Description in Section No. 1 of the permit has been significantly expanded and renamed Permit Summary and Statement of Basis. This section of the permit includes a description of the facility, a discussion of the regulatory applicability and exemption determinations, and a discussion of the monitoring and operational requirements on the emissions units. Additional applicability information is also included throughout the permit in the individual permit attachments.
- Kiln No. 3 and Kiln No. 4 ROC, NO_x, and CO Emission Limits (PO00036PC2) This Attachment PO00036PC2 in Section No. 7 of the permit has been revised to require the use of only natural gas as a fuel to fire the kilns. Pursuant to District Rule 29.B.3.b, the permit no longer authorizes the use of fuel oil or distillate fuel as the kilns are no longer equipped to fire these liquid fuels. Condition No. 1 now contains a natural gas consumption limit for each kiln and this new requirement results in a NO_x emission reduction of approximately 13 tons per year. This attachment previously contained a “cap” for the emissions of ROC, NO_x and CO from firing a combination of natural gas and fuel oil. With the removal of fuel oil, only a reduction in NO_x emissions (and not ROC and CO) was realized because natural gas combustion is “worst case” for these pollutants. The PM and SO_x emissions from fuel combustion are not significant compared to the emissions from the clay raw material and the diesel fuel added in the extruders and are regulated in Attachment PO00036PC3 and Attachment PO00036PC5. Condition No. 2 has been revised to require that the frequency of the ARB Method 100 source testing for NO_x and CO be increased from once every 4 years to once every 12 months. By exercising its authority in District Rule 103.A.4, Condition No. 3

has been added to require the use of a continuous emissions monitoring system to demonstrate compliance with the emissions limits for NO_x and CO in Condition No. 2. This continuous emissions monitoring system is required to be in operation by January 1, 2007. In summary, changes to this attachment have reduced emissions as well as increased the level of periodic monitoring to demonstrate compliance with the NO_x and CO emission limits.

- Particulate Matter Emissions Requirements for Kiln No. 3 and Kiln No. 4 (PO00036PC3) This Attachment PO00036PC3 has been revised to require that the frequency of the Condition No. 2 CARB Method 5 source testing be increased from once every 4 years to once every 12 months. Condition No. 1 now requires that aggregate production records be submitted to the District with the annual compliance certification. Condition No. 3 has been revised to clarify that proper operation of the baghouse means proper operation of the associated particulate matter emission collection and control system, including the fans, baghouses, and exhaust ducts. Condition No. 3 now also includes a requirement that there be no visible emissions from the kilns as well as no visible emissions from the dust handling system. Condition No. 5.b.3 requires that the kilns, in addition to the inlet exhaust duct from the kiln to the baghouse, be inspected on a weekly basis for visible emissions. Compliance dates in Condition No. 5 have been delayed due to the delay in the permit reissuance. In addition, a reference to the United States Bureau of Mines has been added to citations of the District Rule 50 Ringelmann Chart.
- Extruder Diesel Fuel Additive Requirements (PO00036PC5) Condition No. 2 of this Attachment PO00036PC5 has been revised to reduce the diesel fuel volume limit from 452,700 gallons per year to 150,000 gallons per year as process modifications have resulted in the need for less diesel fuel additive. The Condition No. 5 sulfur content limit for these diesel additives has been reduced from 0.16 percent by weight (1,600 parts per million) to 15 parts per million by weight. The volume limit and sulfur content limit have been applied as surrogate limits to help to enforce the SO_x tons per year limit of District Rule 26 in Attachment PO00036PC9. Although already regulated by other state and federal regulations, Condition No. 1 has been expanded to prohibit the addition of hazardous waste or contaminated soils into the extrusion process or into the kilns.
- Material Handling Requirements (PO00036PC6) This Attachment PO00036PC6 has been revised to require that the frequency of the Condition No. 4 moisture content testing be increased from semi-annual to once every three months (quarterly) and that the moisture content tests be submitted with the annual compliance certification. This increased periodic monitoring will help to make sure that the moisture content at the subject conveyors be maintained at a minimum of 3% as required by District Rule 26, "New Source Review".
- Water Spray and Fugitive Emission Requirements (PO00036PC7) This Attachment PO00036PC7 has been revised to require that the records of the inspections of the water spray equipment located at specified transfer points be submitted to the District with the annual compliance certification. In addition, a reference to the United States Bureau of Mines has

been added to citations of the District Rule 50 Ringelmann Chart. Inspections required by this attachment will help to make sure that the facility is complying with District Rule 50, "Opacity", and 40 CFR Part 60, Subpart OOO, "Standards of Performance for Nonmetallic Mineral Processing Facilities".

- Particulate Matter Emission Requirements – Finished End Baghouse (PO00036PC8) This Attachment PO00036PC8 has been revised to require that the frequency of the Condition No. 2 CARB Method 5 source testing be increased from once every 5 years to once every 12 months. In addition, a reference to the United States Bureau of Mines has been added to citations of the District Rule 50 Ringelmann Chart. This increased periodic monitoring will help to make sure that the finished end baghouse complies with District Rule 50, "Opacity", District Rule 52, "Particulate Matter - Concentration (Grain Loading)", and District Rule 53, "Particulate Matter - Process Weight".
- Kiln No. 3 and Kiln No. 4 SOx Emission Limits (PO00036PC9) This Attachment PO00036PC9 has been revised to require that the frequency of the Condition No. 11 Relative Accuracy testing be increased from once every 24 months to once every 12 months. This increased level of source testing, along with the already required monitoring, record keeping, and reporting, will help to make sure that the facility is complying with District Rule 26, "New Source Review", District Rule 54, "Sulfur Compounds", and District Rule 103, "Continuous Monitoring Systems".
- Rule 50, Opacity (50) This Attachment 50 in Section No. 8 of the permit has been revised to more clearly define the applicability of the attachment to all equipment listed in Table Nos. 2, 3 and 4 of the permit as well as all mining activities; truck loading, unloading, and transferring operations; paved and unpaved roads; disturbed surface areas; and all material storage piles. The attachment has been revised to require that the frequency of the Condition No. 3 compliance verifications be increased from annually to quarterly. These quarterly formal surveys are to be submitted with the annual compliance certification. In addition, a reference to the United States Bureau of Mines has been added to citations of the District Rule 50 Ringelmann Chart. Most significantly, Condition No. 4 has been changed to require the implementation and maintenance of a District approved "Fugitive Dust Reduction Plan" to demonstrate compliance with District Rule 50. This "Fugitive Dust Reduction Plan" is to be approved and implemented by July 1, 2006. This "Fugitive Dust Reduction Plan" shall include, but not be limited to, watering, the use of dust suppressants, the use of rumble grates or gravel pads to minimize track out material, and the use of posted speed limits on unpaved haul roads. The "Fugitive Dust Reduction Plan" shall include monitoring, recordkeeping and reporting requirements to verify that it is being implemented.

Changes to the Proposed Permit Upon Final Permit Reissuance

In response to comments from Pacific Custom Materials, Inc., EPA Region IX, and the public, revisions were made to the proposed permit during preparation of the final permit. The revisions

include clarifications to the applicability, monitoring, recordkeeping, reporting, and source testing requirements contained in Attachments CFROOO, PC2, PC3, PC4, PC7, PC8, and 50-PO00036. In particular a number of revisions were made to clarify and detail the requirements of 40 CFR Part 64, "Compliance Assurance Monitoring", in Attachment PC3. In addition, the permit term was established to be March 1, 2006 to February 28, 2011 so that no term or condition of the permit would be retroactively effective.

Application No. 00036-221 Submitted to Establish CAM Indicators (Issued 02/21/07)

As required by Part 70 Permit No. 00036, Attachment PO00036PC3, Condition No. 8, Application No. 00036-221 was submitted on August 14, 2006 to establish the Compliance Assurance Monitoring (CAM) indicator values for the baghouses. As outlined above, five CAM indicators were established as part of the Part 70 Permit Reissuance Application. Three of the five indicators required the establishment of values based on particulate matter source testing at the kiln/baghouse exhausts. Source testing was conducted on June 28, 2006 and August 28, 2006 which demonstrated compliance with the 0.2748 pounds Particulate Matter per ton material processed emission limit from each baghouse. The baghouse leak detector system (BLDS) percentage of light received, baghouse pressure drop, and baghouse inlet temperature were all recorded during the testing. CAM indicators for each of these parameters have been established and included in the permit with revisions to Attachment PO00036PC3.

Application No. 00036-231 Submitted to Permit the NOx and CO CEMS (Issued 01/10/08)

As required by Part 70 Permit No. 00036, Attachment PO00036PC2, Condition No. 3, Application No. 00036-231 was submitted on December 1, 2006 to permit the Continuous Emission Monitoring (CEM) system for NOx and CO emissions at the kilns. As outlined above, the NOx and CO CEM system is required by Rule 103.A.4 to demonstrate compliance with the NOx and CO emission limits. Initial Relative Accuracy testing was conducted on January 23, 2007 and February 6, 2007. The District has certified the CEM system.

Application No. 00036-241

Application No. 00036-241 was submitted to permit a new baghouse for control of emissions at the raw material handling process. Various raw material handling equipment changes were made. This installation was authorized by Authority to Construct No. 00036-240 (issued July 23, 2007). The permitted equipment list was also revised to more accurately reflect the flow of material.

Application Nos. 00036-251 (Add Portable Screen) and 00036-261 (Reissuance)

This Part 70 Permit has been reissued for the period March 1, 2011 to February 29, 2016, pursuant to Reissuance Application No. 00036-261 (submitted August 29, 2010). The following items summarize the changes from the current Part 70 Permit No. 00036 (effective March 1, 2006 to February 28, 2011):

- Additions have been made to the Insignificant Activities Table (Section No. 5).
- Revisions have been made to permit conditions that required an initial source test by a specific date that has now passed. The conditions continue to require annual source testing. The District has added the requirement that the testing be done between May 1st and October 31st each year. The conditions are: Attachment PC2, Condition No. 7, Attachment PC8, Condition No. 2, Attachment PC9, Condition No. 11, and Attachment PC10, Condition No. 2.
- The following District rules have been revised and/or revisions of the rule have been adopted into the State Implementation Plan (SIP) since the last reissuance of Part 70 Permit No. 00036:
 - a) Rule 74.2, “Architectural Coatings”
 - b) Rule 74.29, “Soil Decontamination Operations”

Application No. 00036-251 was submitted to permit a portable screening plant as authorized by Authority to Construct No. 00036-250 (issued October 21, 2010). The plant is required to be powered by electrical grid power only. Attachment PO00036PC11 has been added for the specific permit conditions for the plant. The water spray and fugitive emission requirements of Attachment PO00036PC7 will also be applicable to the portable screening plant.

Application No. 00036-311 (Reissuance)

This Part 70 Permit has been reissued for the period April 1, 2016 to March 31, 2021, pursuant to Reissuance Application No. 00036-311 (submitted October 15, 2015). A Part 70 application shield letter was issued on January 4, 2016. No significant changes have been made to the permit based on the Reissuance Application. There are some updates in the Permit Summary and Statement of Basis section.

- The following District rule has been revised and/or revisions of the rule have been adopted into the State Implementation Plan (SIP) since the last reissuance of Part 70 Permit No. 00036:
 - a) Rule 54, “Sulfur Compounds”

NOV by Facility

Since January 1, 1996

Facility selected

00036

Facility No	00036	Trinity ESC - Frazier Park					
		NOV Date	NOV No	Rule Number	Comment	Settlement	Date Closed
		08/21/1996	018363	50	Excess Visible Emissions - Particulates Viol. 50. Paid \$1000.00	\$1,000.00	09/10/1996
		07/17/1997	018282	52	Particulate Matter Emissions - Source Test Kiln #4 Viol. 52. Paid \$3000.00	\$3,000.00	10/06/1997
		03/30/2000	019357	29.C	Permit Condition Not Met - Exceeded Natural Gas Use	\$1,000.00	06/12/2000
		03/30/2000	019359	29.C	Permit Condition Not Met - Kiln Baghouse Fines Not Maintained	\$10,000.00	06/12/2000
		03/30/2000	019360	29.C	Permit Condition Not Met - Failure To Conduct Pressure Drop	\$1,000.00	06/12/2000
		11/21/2000	019395	54.B.1.a	Excess Sulfur Emissions - Exceeded Sulfur Dioxide Limit	\$0.00	02/11/2004
		11/21/2000	019396	29.C	Permit Condition Not Met - Exceeded Nitrogen Oxide Limit	\$0.00	02/11/2004
		03/08/2001	018543	29.C	Permit Condition Not Met - Exceeded Particulate Emission Rate	\$0.00	02/11/2004
		03/08/2001	018544	29.C	Permit Condition Not Met - Exceeded Particulate Emission Rate	\$0.00	02/11/2004
		04/16/2002	019869	29.C	Permit Conditions Not Met - Maintain Records	\$0.00	02/11/2004
		10/24/2002	020401	29.C	Permit Condition Not Met - Excess SOx Emission	\$0.00	02/11/2004
		10/24/2002	020402	29.C	Permit Condition Not Met - Excess SOx Emission	\$0.00	02/11/2004

10/24/2002	020403	103	Failure To Record Emission Data - CEMS	\$0.00	02/11/2004
11/26/2002	020407	103.A.4	Failure To Properly Operate & Maintain Equipment - CERMS	\$0.00	02/11/2004
09/02/2004	020287	29.C	Permit Condition Not Met - Baghouse	\$1,000.00	10/20/2004
11/15/2005	021095	29.C.2	Permit Condition Not Met - Kilns	\$5,000.00	12/01/2005
11/30/2006	021385	29.C.2	Permit Condition Not Met - CEMS	\$0.00	01/17/2007
09/10/2007	021592	29.C	Permit Condition not met-Kiln	\$0.00	12/12/2007
03/26/2009	022258	10.B.1	Operating Without A Permit - Aggregate Plant	\$7,500.00	12/31/2009
03/26/2009	022259	29.C.1	Permit Condition Not Met - Aggregate Processing	\$7,500.00	12/31/2009
03/26/2009	022260	10.A.B	Operating Without A Permit - Portable Screen & Engines	\$2,500.00	12/31/2009
02/12/2015	022600	54.B.2	Excess Sulfur Emissions - Kiln #3	\$3,000.00	03/25/2015

Total for 22 NOV's

\$42,500.00

1.c. PERIODIC MONITORING SUMMARY

This periodic monitoring summary is intended to aid the permittee in quickly identifying key monitoring, recordkeeping, and reporting requirements. It is not intended to be used as a "stand alone" monitoring guidance document that completely satisfies the requirements specifically applicable to this facility. The following tables are included in the periodic monitoring summary:

- Table 1.c.1 - Specific Applicable Requirements
- Table 1.c.2 - Permit-Specific Conditions
- Table 1.c.3 - General Applicable Requirements
- Table 1.c.4 - General Requirements for Short-Term Activities

1.c.1 Specific Applicable Requirements

The Specific Applicable Requirements Table includes a summary of the monitoring requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 6 of this permit.

Attachment No./Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Reports	Test Methods	Comments
CFR 000 8.31.83	40 CFR Part 60, Subpart 000, Installed after 08/31/83 and before 04/22/08	<ul style="list-style-type: none"> •Source tests and opacity readings upon request •Annual compliance certification 	<ul style="list-style-type: none"> •Records of start-up, shutdown, or malfunction of affected facility •Records of malfunction of air pollution control system •Records during which monitoring system or device is inoperative •Records of source tests or opacity observations 	None	<ul style="list-style-type: none"> •EPA Method 5 •EPA Method 17 •EPA Method 9 •EPA Method 22 	
CFR 000 4.22.08	40 CFR Part 60, Subpart 000, Installed after 04/22/08	<ul style="list-style-type: none"> •Source tests and opacity readings upon request •Annual compliance certification •Monthly water spray inspection 	<ul style="list-style-type: none"> •Records of start-up, shutdown, or malfunction of affected facility •Records of malfunction of air pollution control system •Records during which monitoring system or device is inoperative •Records of source tests or opacity observations •Records of monthly water spray inspections 	None	<ul style="list-style-type: none"> •EPA Method 5 •EPA Method 17 •EPA Method 9 •EPA Method 22 	

1.c.2 Permit-Specific Conditions

The Permit-Specific Conditions Table includes a summary of the monitoring requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 7 of this permit.

Attachment No./Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Reports	Test Methods	Comments
PO00036PC1 Condition No. 1	Rule 26 General Recordkeeping	<ul style="list-style-type: none"> Annual compliance certification Monthly records of throughput and consumption 	<ul style="list-style-type: none"> Monthly records 	None	None	
PO00036PC1 Condition No. 2	Rule 29 Solvent Recordkeeping	<ul style="list-style-type: none"> Monthly records of solvent purchase and usage Annual compliance certification 	<ul style="list-style-type: none"> Records of solvent purchase and usage 	None	None	
PO00036PC2 Condition No. 1	Rule 26 Annual Natural Gas Consumption Limits for Kiln Nos. 3 and 4	<ul style="list-style-type: none"> Daily and monthly records of natural gas consumption Twelve month rolling records of natural gas consumption Annual compliance certification, including natural gas consumption records 	<ul style="list-style-type: none"> Daily and monthly records of natural gas consumption Twelve month rolling records of natural gas consumption 	None	None	
PO00036PC2 Condition Nos. 2 – 7	Rules 26, 68, and 103 NOx and CO Emission Limits for Kiln Nos. 3 and 4	<ul style="list-style-type: none"> Annual compliance certification CEM for NOx and CO Relative Accuracy (RA) test for CEM every twelve (12) months 	<ul style="list-style-type: none"> CEM records Relative Accuracy test records 	Submit source test report within 45 days of completion	<ul style="list-style-type: none"> NOx-ARB Method 100 CO - ARB Method 100 O2 - ARB Method 100 Exhaust Flow - ARB Method 2 	
PO00036PC3 Condition Nos. 1 – 7	Rules 26, 50, 52, 53 PM Emission Requirements for Kiln Nos. 3 and 4	<ul style="list-style-type: none"> Daily and monthly records of the amount of aggregate processed (on a dry basis) for each kiln Daily, weekly, and quarterly baghouse inspections PM source test every twelve (12) months Annual compliance certification, including aggregate processing records 	<ul style="list-style-type: none"> Daily and monthly records of aggregate processed Record of source tests Log of baghouse inspections and maintenance 	Submit source test report within 45 days of completion	<ul style="list-style-type: none"> CARB Method 5 EPA Method 9 	
PO00036PC3 Condition No. 8	40 CFR Part 64 Compliance Assurance Monitoring (CAM)	<ul style="list-style-type: none"> PM intensity with baghouse leak detector system, with initial source test Bag condition Visible emissions Baghouse pressure drop Baghouse temperature Annual compliance certification 	<ul style="list-style-type: none"> Record "percentage of light received" Log of baghouse inspections Log of visible emission observations Log of daily baghouse pressure drop Log of daily baghouse temperature Source test results Record of excursions, including number and duration, the type, the cause, and corrective action taken 	<ul style="list-style-type: none"> Semiannual report of CAM excursions Submit source test report within 45 days of completion 	<ul style="list-style-type: none"> CARB Method 5 EPA Method 9 	

1.c.2 Permit-Specific Conditions (Cont.)

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Reports	Test Methods	Comments
PO00036PC3 Condition No. 9	01/12/04 Settlement Monthly Reports			<ul style="list-style-type: none"> Monthly report of clay processed, bag leak detection system data, and baghouse temperature 		Report of monitoring data from above requirements
PO00036PC4	Rule 26 Standby Material Handling Equipment	<ul style="list-style-type: none"> Records demonstrating compliance Annual compliance certification 	<ul style="list-style-type: none"> Records demonstrating compliance 	None	None	Condition prohibits simultaneous operation
PO00036PC5 Condition Nos. 1, 2, 3, 5, 6	Rule 26 Extrusion Process Using Diesel Fuel No. 2 or Biodiesel Additive	<ul style="list-style-type: none"> Monthly and twelve month rolling records of Diesel Fuel No. 2 and Biodiesel added in extrusion process Supplier's certification of sulfur content, or test per each delivery (submit with annual compliance certification) Supplier's certification of ASTM standard for Biodiesel Annual compliance certification 	<ul style="list-style-type: none"> Monthly and twelve month rolling records of gallons of diesel fuel added in extrusion process Supplier's certification of sulfur content, or test per each delivery Supplier's certification of ASTM standard for Biodiesel A log of monthly amounts used of Diesel Fuel No. 2 and Biodiesel 	None	<ul style="list-style-type: none"> ASTM Method D4294-98 or D2622-98 for sulfur content ASTM D-6751 for Biodiesel specifications 	
PO00036PC5 Condition No. 4	01/12/04 Settlement Monthly Report			<ul style="list-style-type: none"> Monthly report of amount, date, and supplier of diesel fuel deliveries 		Report of monitoring data from above requirements
PO00036PC6	Rule 26 Material Handling Requirements	<ul style="list-style-type: none"> Quarterly moisture content tests Annual compliance certification, with results of above moisture tests 	<ul style="list-style-type: none"> Records of moisture content tests 	None	<ul style="list-style-type: none"> ASTM Method C-566 	
PO00036PC7	Rule 26, 40 CFR, Part 60, Subpart 000 Water Spray and Fugitive Emission Requirements	<ul style="list-style-type: none"> Inspect water spray equipment every two weeks Annual compliance certification, including a formal survey of all transfer points and records of water spray equipment inspections Opacity readings upon request Notification required for uncorrectable visible emissions 	<ul style="list-style-type: none"> Records of water spray inspections Annual formal survey of all transfer points 	None	<ul style="list-style-type: none"> Opacity-EPA Method 9 	

1.c.2 Permit-Specific Conditions (Cont.)

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Reports	Test Method	Comments
PO00036PC8	Rules 26, 50, 52, 53 Particulate Matter Emission Requirements for the Finished End Baghouse	<ul style="list-style-type: none"> Annual compliance certification Daily, weekly, and quarterly baghouse inspections PM source test every 12 months 	<ul style="list-style-type: none"> Record of source tests Log of baghouse inspection and maintenance activities 	<ul style="list-style-type: none"> Submit source test report within 45 days of completion 	<ul style="list-style-type: none"> PM – CARB Method 5 Opacity – EPA Method 9 	
PO00036PC9 Condition Nos. 1, 2, 3, 4, 6, 8, 9, 10, 11	Rules 26, 54, and 103 SOx limits in terms of tons per year, pounds per hour, and ppmv as measured by CEM. lime injection required	<ul style="list-style-type: none"> Direct monitoring of SOx emissions (ppmv and lb/hr) with Continuous Emissions Monitor Relative Accuracy (RA) test for CEM system every 12 months Annual compliance certification Records of lime injection rate Annual compliance certification Maintain records of the amount and date of lime deliveries Provide the District with real time access by modem to SOx CEM system 	<ul style="list-style-type: none"> Hourly CEM records in terms of ppmv SOx and lb/hr SOx Tons per year SOx emissions per CEM RA source test reports Hourly lime injection rate 	<ul style="list-style-type: none"> Submit source test report within 45 days of completion Report of violation within 96 hours 	<ul style="list-style-type: none"> EPA Method 6, 6A, 6C, or 8 as appropriate 40 CFR Part 60, Appendix B, Performance Specifications 2 and 6 	
PO00036PC9 Condition Nos. 5 and 7	01/12/04 Settlement Monthly report and CEM system real time access	<ul style="list-style-type: none"> Maintain records of the amount and date of lime deliveries Provide the District with real time access by modem to SOx CEM system 	<ul style="list-style-type: none"> Amount and date of lime deliveries 	<ul style="list-style-type: none"> Monthly report of amount and date of lime deliveries 	None	
PO00036PC10	Rules 26, 50, 52, 53 Particulate Matter Emission Requirements for the Raw Material Baghouse	<ul style="list-style-type: none"> Annual compliance certification Daily, weekly, and quarterly baghouse inspections PM source test every 12 months 	<ul style="list-style-type: none"> Record of source tests Log of baghouse inspection and maintenance activities 	<ul style="list-style-type: none"> Submit source test report within 45 days of completion 	<ul style="list-style-type: none"> PM – CARB Method 5 Opacity – EPA Method 9 	
PO00036PC11	Rule 26, 40 CFR, Part 60, Subpart 000	<ul style="list-style-type: none"> Moisture content measurements every six months or annually Initial Method 9 source test Annual compliance certification 	<ul style="list-style-type: none"> Moisture content measurements Record of opacity test 	<ul style="list-style-type: none"> Submit moisture content measurements annually 	<ul style="list-style-type: none"> 	

1.c.3 General Applicable Requirements

The General Applicable Requirements Table includes a summary of the monitoring requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 8 of this permit.

Attachment No / Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Reports	Test Methods	Comments
50	Rule 50	<ul style="list-style-type: none"> • Routine surveillance • Visual inspections • Annual compliance certification, including quarterly formal surveys • Opacity readings upon request • Notification required for uncorrectable visible emissions • Fugitive Dust Plan monitoring • Annual compliance certification • Follow monitoring requirements under Rule 64 • Upon request, source test for sulfur compounds at point of discharge 	<ul style="list-style-type: none"> • All occurrences of visible emissions for periods > 3min in any one hour • Annual formal survey of all emissions units • Fugitive Dust Plan recordkeeping 	As required by Fugitive Dust Plan	<ul style="list-style-type: none"> • Opacity - EPA Method 9 	
54.B.1-36	Rule 54.B.1 for combustion emissions other than from Kiln No. 3 and Kiln No. 4	<ul style="list-style-type: none"> • Annual compliance certification • Determine ground or sea level concentrations of SO₂, upon request 	None	None	<ul style="list-style-type: none"> • Sulfur Compounds - EPA Test Method 6, 6A, 6C, 8, 15, 16A, 16B, or SCAQMD Method 307-94, as appropriate 	Compliance with Rule 64 ensures compliance with this rule based on District analysis
54.B.2-36	Rule 54.B.2 for combustion emissions other than from Kiln No. 3 and Kiln No. 4	<ul style="list-style-type: none"> • Annual compliance certification • Determine ground or sea level concentrations of SO₂, upon request 	<ul style="list-style-type: none"> • Representative fuel analysis or exhaust analysis and compliance demonstration 	None	<ul style="list-style-type: none"> • SO₂ - BAAQMD Manual of Procedures, Vol. VI, Section 1, Ground Level Monitoring for H₂S and SO₂ 	
55	Rule 55	<ul style="list-style-type: none"> • Annual compliance certification 	<ul style="list-style-type: none"> • Specific activity records as applicable 	None	<ul style="list-style-type: none"> • EPA Method 9 	
64.B.1	Rule 64.B.1	<ul style="list-style-type: none"> • Annual compliance certification • Annual and quarterly tests if gas is other than PUC-quality gas, propane, or butane (submit annual test with annual compliance certification) • No testing required for PUC-quality gas, propane, or butane 	<ul style="list-style-type: none"> • Annual and quarterly fuel gas analysis if gas is other than PUC-quality gas, propane, or butane 	None	<ul style="list-style-type: none"> • SCAQMD Method 307-94, or • ASTM Method D1072-90, or • ASTM Method D 4810-88, or • ASTM Method D4084-94 	
64.B.2	Rule 64.B.2	<ul style="list-style-type: none"> • Annual compliance certification • Fuel supplier's certification, or fuel test per each delivery (submit with annual compliance certification) 	<ul style="list-style-type: none"> • Fuel supplier's certification, or fuel test per each delivery 	None	<ul style="list-style-type: none"> • ASTM Method D4294-98 or D2622-98 	

1.c.3 General Applicable Requirements (Continued)

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Reports	Test Methods	Comments
74.6	Rule 74.6	<ul style="list-style-type: none"> • Annual compliance certification • Maintain current solvent information • Routine surveillance of solvent cleaning activities • Upon request, solvent testing • Measurement of freeboard height and drain hole area for cold cleaners (as applicable) 	<ul style="list-style-type: none"> • Records of current solvent information 	None	<ul style="list-style-type: none"> • ROC content-EPA Test Method 24 • Identity of solvent components-ASTM E168-67, ASTM E169-87, or ASTM E260-85 • True vapor pressure or composite partial pressure -ASTM D2879-86 or other methods per Rule 74.6 G.5 • Initial boiling point-ASTM 1078-78 or published source • Spray gun active/passive solvent losses-SCAQMD Method (10-3-89) 	
74.11.1	Rule 74.11.1	<ul style="list-style-type: none"> • Annual compliance certification • Maintain identification records of large water heaters and small boilers 	<ul style="list-style-type: none"> • Records of current information of large water heaters and small boilers 	None	None	Rule only applies to the installation of large water heaters and small boilers
74.22	Rule 74.22	<ul style="list-style-type: none"> • Annual compliance certification • Maintain furnace identification records 	<ul style="list-style-type: none"> • Records of current furnace information 	None	None	Rule only applies to future installation of natural gas-fired, fan-type furnaces

1.c.4 General Requirements for Short-Term Activities

The General Requirements for Short-Term Activities Table includes a summary of the monitoring requirements, recordkeeping requirements, reporting requirements, and test methods associated with the attachments contained in Section No. 9 of this permit.

Attachment No./ Condition No.	Applicable Rule or Requirement	Monitoring	Recordkeeping	Reports	Test Methods	Comments
74.1	Rule 74.1	<ul style="list-style-type: none"> Annual compliance certification Routine surveillance and visual inspections of abrasive blasting operation Abrasive blasting records 	<ul style="list-style-type: none"> Abrasive blasting records 	None	<ul style="list-style-type: none"> Visible emission evaluation-Section 92400 of CCR 	
74.2	Rule 74.2	<ul style="list-style-type: none"> Annual compliance certification Routine surveillance Maintain VOC records of coatings used 	<ul style="list-style-type: none"> Maintain VOC records of coatings used 	None	<ul style="list-style-type: none"> VOC content-EPA Method 24, CARB Method 432 Acid content-ASTM Method D 1613-85, Metal content-SCAQMD Method 311-91 	
74.29	Rule 74.29	<ul style="list-style-type: none"> Annual compliance certification Weekly measurements of in-situ soil bioventing or bioremediation Weekly measurements of soil aeration Date and quantity of soil aerated Routine surveillance Notification required for excavation 	<ul style="list-style-type: none"> Weekly measurements of soil decontamination operation vapor concentration Date and quantity of soil aerated 	<ul style="list-style-type: none"> None 	<ul style="list-style-type: none"> Vapor concentration- EPA Method 21 Wt. % of contaminant in soil-EPA Method 8015B 	
40CFR61.M	40 CFR Part 61, Subpart M	<ul style="list-style-type: none"> Annual compliance certification See 40 CFR Part 61.145 for inspection procedures 	<ul style="list-style-type: none"> See 40 CFR Part 61.145 for recordkeeping procedures 	<ul style="list-style-type: none"> See 40 CFR Part 61.145 for notification procedures 	<ul style="list-style-type: none"> See 40 CFR Part 61.145 for test methods 	

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2. PERMITTED EQUIPMENT AND APPLICABLE REQUIREMENTS TABLE

Purpose

The purpose of this table is to list the emissions units at this stationary source that are permitted to operate pursuant to Rule 10, "Permits Required" and Rule 23, "Exemptions From Permit". The table also provides a list of requirements that are specifically applicable to these emissions units. Permit conditions that enforce these requirements are listed in Section No. 6, "Specific Applicable Requirements" and Section No. 7, "Permit Specific Conditions" of this permit.

In addition to the emission unit specific requirements in Section No. 6 and Section No. 7, there are additional general requirements that may apply to the emissions units listed in this table, or to the stationary source as a whole. Furthermore, some general requirements may apply to emissions units or short-term activities not required to be specifically listed on the permit. These general requirements are contained in the following sections of the Permit: Section No. 8, "General Applicable Requirements"; Section No. 9, "General Requirements for Short-Term Activities"; Section No. 10, "General Permit Conditions"; and Section No. 11, "Miscellaneous Federal Program Conditions".

Equipment Description

This portion of the table provides a brief description of the permitted equipment at this stationary source. Attached to the table is a "Title V Equipment List Description Key" that contains definitions and explanations for some of the standard terminology used in the equipment description.

Applicable Requirements

The applicable requirements portion of the table is a matrix of applicability for the specific requirements that apply to the listed emissions units. The columns are labeled with APCD rule numbers or references to federal requirements. An "X" in the row corresponding to the emissions unit indicates the requirement is specifically applicable to that unit.

Permit specific conditions are identified with a "PC" followed by a number in the column labeled "ADDITIONAL REQUIREMENTS". A "PC#" in the row corresponding to the emissions unit indicates that the permit specific condition is specifically applicable to that unit. The "PC#" also corresponds to the permit attachment in Section No. 7, "Permit Specific Conditions", that contains the permit specific requirements.

TABLE NO. 2

<p align="center">VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT</p> <p align="center">Permit to Operate No. 00036</p> <p align="center">Permitted Equipment and Applicable Requirements</p>			
M:\TITLE\TV Permits\PO0036\Permit\Tables_0036-rev321,331	NSPS 000 8.31.83	NSPS 000 4.22.08	ADDITIONAL REQUIREMENTS
Equipment			
2 - 36.1 MMBTU/Hr NG Aggregate Kilns, Nos. 3 & 4 (E13 & E14) Equipped with the following control systems: 2 - 32,000 ACFM Fuller "Plenum Pulse" Baghouses with 8,000 square feet cloth area (one at each kiln) for particulate matter control A Lime Injection System consisting of one lime storage silo (80 Cu. Yd.) with bin vent dust collector, three feed hoppers, three rotary feeders, and two lime injection pipelines that feed powdered lime to each kiln for SOx control			PC2, PC3, PC9
Kiln Baghouse Dust Handling System consisting of: Pneumatic pipelines from kiln baghouses to 100 Cu. Yd. Tank 1 - 100 Cu. Yd. Tank No. 1 (E24) with bin vent dust collector 1 - Martin Screw Conveyor 1 - Covered Belt Conveyor (No. 28)			PC3
Kiln Material Handling (from Raw Material Tank Nos. 3 & 4 to Kilns) ² 1 - Kiln Material Belt #16 K-3 Feeder 1 - Kiln Material Belt #18 K-4 Feeder 1 - Kiln Material Belt #25 K-3 Incline 1 - Kiln Material Belt #22 K-4 Short Incline 1 - Kiln Material Belt #21 K-4 Long Incline			PC6,PC7
Raw Material Handling Equipment (PRIOR TO KILNS) ²			PC6,PC7
1 - Grizzly Raw Material Receiving Hopper (E37)			PC4
1 - Raw Material Receiving Hopper, Standby (E38)			PC4
1 - Raw Material Inside Feed Belt Conveyor (No. 15), part of standby feed system			PC4
1 - Syntron Raw Material Vibrating Belt Conveyor (E1 - East)			PC4
1 - Syntron Raw Material Vibrating Belt Conveyor (E2 - West)			PC4
1 - J.C. Steele Disintegrator - Raw Material Crusher, Model 6B18-19A, (E5) Baghouse controlled		X	PC10
1 - Symons No. 1 Raw Material Screen (E7), Baghouse controlled			PC10
1 - Symons No. 2 Raw Material Clay Screen (E9), Baghouse controlled	X		PC10
Extrusion Process Using Diesel Fuel No. 2 or Biodiesel as an Additive			PC5
1 - Raw Material Extruder Hopper (E39)			PC5
1 - J.C. Steele 50F Pug Sealer / Pug Mill (E19) Model Mark 8, Serial No. 720515		X	PC5
1 - J.C. Steele 90A Raw Material Extruder (E20) Model AZ, Serial No. 631122		X	PC5
1 - Pellet Hopper (E40)			
8 - Raw Material Belt Conveyors Nos. 4, 11, 12, 13, 14, 16, 17, 18 Baghouse controlled	X		PC10
No. 4 Disintegrator Feed Belt	X		PC10
No. 11 Symons Screen No. 2 Discharge	X		PC10
No. 12 Symons Screen No. 1 Discharge	X		PC10
No. 13 Symons Screen Tail Belt	X		PC10
No. 14 Loop Belt	X		PC10
No. 16 Hopper Feed Belt	X		PC10
No. 17 Pug Mill Feed Belt	X		PC10
No. 18 Pug Mill Feeder Belt	X		PC10
3 - Raw Material Belt Conveyors Nos. 21, 22, 23	X		
No. 21 Extruder Tail Belt	X		
No. 22 To Raw Material Tank Nos. 3 and 4	X		
No. 23 To Raw Material Tank Nos. 3 and 4	X		
1 - 350 Cu.Yd. Raw Material Tank No. 3 (E41)			
1 - 350 Cu.Yd. Raw Material Tank No. 4 (E42)			
1 - Baghouse Dust Dump Screw Auger (E28)		X	PC10
1 - 40,000 cfm Industrial Clean Air Baghouse, Model #41-71S, Serial No. N5405, (E29) Four Compartments, 100 bags each, reverse pulse air, controlling emissions from E5, E7, E9, and Conveyor Nos. 4, 11, 12, 13, 14, 16, 17, and 18 ("Raw Material Baghouse") Baghouse dust pneumatically conveyed to 100 Cu. Yd. Tank No. 1 (E24)		X	PC10

TABLE NO. 2

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT Permit to Operate No. 00036 Permitted Equipment and Applicable Requirements			
M:\TITLE\TV Permits\PO0036\Permit\Tables_0036-rev321,331	NSPS OOO 8.31.83	NSPS OOO 4.22.08	ADDITIONAL REQUIREMENTS
Equipment			
Finished End Material Handling Equipment (POST KILNS) ²			PC6,PC7
1 - Martin Finished Product Screw Conveyor No. K-3 (E36)	X		PC6
1 - Martin Finished Product Screw Conveyor No. K-4 (E37)	X		PC6
1 - Martin Finished Product Bucket Elevator No. K-3 (E38) Finished End Baghouse control	X		PC6,PC8
1 - Martin Finished Product Bucket Elevator No. K-4 (E39) Finished End Baghouse control	X		PC6,PC8
1 - Custom-Made Aggregate Cooler No. 3 (E15 ¹)			
1 - Custom-Made Aggregate Cooler No. 4 (E16 ¹)			
1 - Syntron Finished Product Vibrating Belt Conveyor No. K-3 (E17)			PC6
1 - Syntron Finished Product Vibrating Belt Conveyor No. K-4 (E18)			PC6
1 - Tower Shaker Finished Product 2-Deck Screen, Scalping (E19)	X		
1 - Tyler-Niagra Chute (E20) Finished End Baghouse control			PC8
1 - Finished Product Vertical Impact Crusher (E30) Finished End Baghouse control	X		PC4, PC8
1 - Symons No. 3 Finished Product 1-Deck Clay Screen (E34) Finished End Baghouse control	X		PC8
1 - Overstrom Finished Product 4' x 8' 1-Deck Screen (E22) Baghouse control	X		PC8
1 - O'Brien Finished Product 1-Deck Screen (E23) Baghouse control	X		PC8
1 - Yogi Finished Product 2-Deck Screen (E21) Finished End Baghouse control			PC8
1 - 115 Cu. Yd. Finished Product Tank No. 4 (E29) (Out of Service)			PC4
1 - Rex Finished Product Bucket Elevator (E33) (Out of Service)			PC4
1 - Finished End Belt Conveyor (No. 46)			PC4
2 - Finished End Belt Conveyors (Nos. 25, 26)	X		
6 - Finished End Belt Conveyors (Nos. 33, 34, 45, 47-49)	X		
1 - Finished End Radial Stacking Conveyor (No. 29) Superior, Inc. 24"x100', Model F24X100PRSC, Serial No. U880633		X	
1 - Finished End Belt Conveyor (No. 30) (Out of Service)			PC4
2 - Finished End Belt Conveyors (Nos. 54 ¹ , 55 ¹) Baghouse controlled	X		PC8
13 - Finished End Belt Conveyors (Nos. 28, 31-32, 35-44)			
1 - Finished Product Deflection Plate (At End of Load-Out Conveyors)			
1 - "Finished End Baghouse" with Screw Conveyor and pulse jet cleaning system, controlling emissions from the Vertical Impact Crusher (E30); K3 & K4 Bucket Elevators (E38) & (E39); Conveyor Nos. 54 & 55; Screen Nos. E21, E22, E23, E34; and Tyler Niagra Chute (E20)	X		PC8
1 - Syntron Conveyor No. 4 (E40) (Out of Service)			PC4
Screening Plant (Portable)			
1 - Receiving Hopper		X	PC7,PC11
1 - Screen		X	PC7,PC11
4 - Conveyors (Screen feed conveyor and three screen output conveyors)		X	PC7,PC11
Screening Plant (Portable) Powerscreen Chieftain 2100S 3 Deck Inline Screen			
1 - Receiving Hopper		X	PC7,PC11
1 - 3 Deck Screen		X	PC7,PC11
6 - Conveyors		X	PC7,PC11
¹ - Equipped with water spray			
² - PC6 and PC7 apply to all material handling equipment			

TITLE V EQUIPMENT LIST DESCRIPTION KEY

The Permitted Equipment and Applicable Requirements Table and this Title V permit contain a number of terms, abbreviations, and acronyms that have been standardized. The following list describes and defines many of the terms in this permit:

APCD	Air Pollution Control District
APCO	Air Pollution Control Officer of the Ventura County APCD
ARB	The California Air Resources Board
ASTM	American Standards for Testing Materials
BACT	Best Available Control Technology
BHP	The rating of an internal combustion engine as measured in brake horsepower
CARB	California Air Resources Board
CFH	Cubic feet per hour
CFM	Cubic feet per minute
CFR	Code of Federal Regulations
CO	Carbon Monoxide
CO _{2e}	Carbon Dioxide Equivalent
Cu. Yd.	Cubic yard
EPA	Environmental Protection Agency
FO	Fuel oil or diesel fuel
Gal	Gallon
HAP	Hazardous Air Pollutant
HHV	Higher heating value of fuel
HP	Horsepower
Lb / Hr	Pounds per Hour
Lb / Gal	Emission factor expressed as pounds per gallon

Lb / MMCF	Emission factor expressed as pounds per million cubic feet
Lb ROC/Gal	Pound(s) of ROC per gallon
Lo-NOx	Device has equipment to control the emissions of NOx
LPG	Liquid petroleum gas
MMBTU/Hr	The heat input of a combustion device as measured in millions of British Thermal Units per hour
NESHAPS	National Emission Standards for Hazardous Air Pollutants
NG	Natural gas fired
NOx	Oxides of Nitrogen
NSPS	New Source Performance Standards
PM	Particulate Matter
PPMVD	Parts per million by volume, dry
ROC	Reactive Organic Compound
SCAQMD	South Coast Air Quality Management District
SCFM	Standard cubic feet per minute
SIP	State Implementation Plan
SOx	Sulfur Oxides
1,1,1-TCA	Trichloroethane
TV AF	Title V application form
VOC	Volatile Organic Compound

3. PERMITTED THROUGHPUT AND CONSUMPTION LIMIT TABLE

Purpose

The purpose of this table is to list the emissions units at this stationary source that have limitations on throughput, fuel consumption, raw material usage, hours of operation, or other parameters that limit the potential to emit of the emissions unit. In some cases, the limit on the potential to emit is expressed directly as a set of pollutants and emission limits in tons per year.

These limitations are applied pursuant to Rule 26, "New Source Review" or Rule 29, "Conditions on Permits". Two sets of limits are listed in this table. The "Throughput Permit Limit" is the enforceable limit pursuant to this permit. Permit conditions that enforce these limits are listed in Section No. 7, "Permit Specific Conditions" of this permit.

The "Calculation Throughput" is used only to calculate permitted emissions pursuant to Rule 29, "Conditions on Permits".

Equipment Description

This portion of the table is the same as the equipment description in the "Permitted Equipment and Applicable Requirements Table".

Throughput Permit Limit

The throughput or consumption limit listed in this column of the table is an enforceable limit on the emissions unit's potential to emit. In the column labeled "District (D)/ Federal (F) Enforceable", a "D" or an "F" denotes whether the limit is only enforceable by the District or whether the limit is a federally-enforceable limit. District-enforceable limits are limits applied solely pursuant to Rule 29, "Conditions on Permits". Limits that have been applied pursuant to Rule 26, "New Source Review" are federally enforceable.

The throughput permit limit may apply to a single emissions unit or to a set of emission units. When the limit applies to set of emissions units, the set consists of the emissions unit with which the limit is listed and the emissions units which follow that have an asterisk in the throughput permit limit column.

Pursuant to Rule 26 and Rule 29, the throughput permit limit is an annual limit which is enforceable based on a period of any twelve (12) consecutive calendar months.

Note that when the calculation throughput (discussed below) corresponds to using the emissions unit full time (8760 hours per year) at maximum rated capacity, the throughput permit limit column contains the notation "No Limit". When District emission calculation procedures do not involve throughput or consumption data, both the throughput permit limit and the calculation throughput

column are left blank.

Calculation Throughput

The throughput or consumption limit listed in this column of the table is the throughput used in the District calculation procedures to calculate permitted emissions for the emissions unit. The calculation throughput may apply to a single emissions unit or to a set of emissions units denoted as discussed above. The calculation throughput is not an enforceable permit limit.

Abbreviations

The following abbreviations have been used in the "Permitted Throughput and Consumption Limit Table" for the "Throughput Permit Limit" column and for the "Calculation Throughput Limit" column:

BBL/Yr: barrels per year

Days/Yr: days per year

FO: fuel oil or diesel fuel

Gal/Yr: gallons per year

Hrs/Day: hours per day

Hrs/Yr: hours per year

Lbs/day: pounds per day

Lbs ROC/Yr: pounds of reactive organic compounds per year

MBBL/Yr: thousands of barrels per year

MGal/Yr: thousands of gallons per year

MMBTU/Yr: million British Thermal Units of heat input per year

MMCF/Yr: million standard cubic feet of natural gas per year

MMGal/Yr: million gallons per year

NG: natural gas

TPY: tons per year

TABLE NO. 3

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT Permit to Operate No. 00036 Permitted Throughput/Consumption Limits			
Equipment	Throughput/Emission Permit Limit	District (D)/ Federal(F) Enforceable	Calculation Throughput
			M:\ATP\LEVTV Permits\PO0036\PERMITIV\Tables_0036-rev321.331
2 - 36.1 MMBTU/Hr NG Aggregate Kilns, Nos. 3 & 4 (E13 & E14)	308.0 MMCF/Yr NG Per Kiln	F	308.0 MMCF/Yr NG @ Kiln 3 & 308.0 MMCF/Yr NG @ Kiln 4
Equipped with the following control systems: 2 - 32,000 ACFM Fuller "Plenum Pulse" Baghouses with 8,000 sqft cloth area (one at each kiln) for particulate matter control A Lime Injection System consisting of one lime storage silo (80 Cu. Yd.) with bin vent dust collector, three feed hoppers, three rotary feeders, and two lime injection pipelines that feed powdered lime to each kiln for SOx control	218,280 TPY Aggregate	F	218,280 TPY Aggregate
	And the following annual mass emission limit: 63.55 TPY SOx ²	F	26,280 tons baghouse dust/yr (8,760 hr/yr)
Kiln Baghouse Dust Handling System consisting of: Pneumatic pipelines from kiln baghouses to 100 Cu. Yd. Tank 1 - 100 Cu. Yd. Tank No. 1 (E24) with bin vent dust collector 1 - Martin Screw Conveyor 1 - Covered Belt Conveyor (No. 28)			
Kiln Material Handling (from Raw Material Tank Nos. 3 & 4 to Kilns)	218,280 TPY Aggregate	F	
1 - Kiln Material Belt #16 K-3 Feeder	+	F	200,818 TPY Clay
1 - Kiln Material Belt #18 K-4 Feeder	+	F	200,818 TPY Clay
1 - Kiln Material Belt #25 K-3 Incline	+	F	200,818 TPY Clay
1 - Kiln Material Belt #22 K-4 Short Incline	+	F	200,818 TPY Clay
1 - Kiln Material Belt #21 K-4 Long Incline	+	F	200,818 TPY Clay
Raw Material Handling Equipment (PRIOR TO KILNS)	218,280 TPY Aggregate	F	401,635 TPY Clay ³
1 - Grizzly Raw Material Receiving Hopper (E37)	+	F	401,635 TPY Clay
1 - Raw Material Receiving Hopper, Standby (E38)	+	F	
1 - Raw Material Inside Feed Belt Conveyor (No. 15), part of standby feed system	+	F	
1 - Syntron Raw Material Vibrating Belt Conveyor (E1 - East)	+	F	200,818 TPY Clay
1 - Syntron Raw Material Vibrating Belt Conveyor (E2 - West)	+	F	200,818 TPY Clay
1 - J.C. Steele Disintegrator - Raw Material Crusher, Model 6B18-19A, (E5) Baghouse controlled	+	F	522,126 TPY Clay
1 - Symons No. 1 Raw Material Screen (E7), Baghouse controlled	+	F	261,063 TPY Clay
1 - J.C. Steele No. 2 Raw Material Clay Screen (E9), Baghouse controlled	+	F	261,063 TPY Clay
Extrusion Process Using Diesel Fuel No. 2 or Biodiesel as an Additive	150,000 Gal/Yr Diesel	F	218,280 TPY Aggregate
1 - Raw Material Extruder Hopper (E39)	+	F	
1 - J.C. Steele 50F Pug Sealer / Pug Mill (E19) Model Mark 8, Serial No. 720515	+	F	
1 - J.C. Steele 90A Raw Material Extruder (E20) Model AZ, Serial No. 631122	+	F	
1 - Pellet Hopper (E40)	+	F	
8 - Raw Material Belt Conveyors Nos. 4, 11, 12, 13, 14, 16, 17, 18 Baghouse controlled	+	F	
No. 4 Disintegrator Feed Belt	+	F	401,635 TPY Clay
No. 11 Symons Screen No. 2 Discharge	+	F	401,635 TPY Clay
No. 12 Symons Screen No. 1 Discharge	+	F	401,635 TPY Clay
No. 13 Symons Screen Tail Belt	+	F	120,491 TPY Clay
No. 14 Loop Belt	+	F	120,491 TPY Clay
No. 16 Hopper Feed Belt	+	F	401,635 TPY Clay
No. 17 Pug Mill Feed Belt	+	F	401,635 TPY Clay
No. 18 Pug Mill Feeder Belt	+	F	401,635 TPY Clay
3 - Raw Material Belt Conveyors Nos. 21, 22, 23			
No. 21 Extruder Tail Belt	+	F	401,635 TPY Clay
No. 22 To Raw Material Tank Nos. 3 and 4	+	F	401,635 TPY Clay
No. 23 To Raw Material Tank Nos. 3 and 4	+	F	401,635 TPY Clay
Extruder Tail Belt to Raw Material Tank Nos. 3 and 4	+	F	
1 - 350 Cu. Yd. Raw Material Tank No. 3 (E41)	+	F	
1 - 350 Cu. Yd. Raw Material Tank No. 4 (E42)	+	F	
1 - Baghouse Dust Dump Screw Auger (E28)	+	F	
1 - 40,000 cfm Industrial Clean Air Baghouse, Model #41-71S, Serial No. N5405, (E29) Four Compartments, 100 bags each, reverse pulse air, controlling emissions from E5, E7, E9, and Conveyor Nos. 4, 11, 12, 13, 14, 16, 17, and 18 ("Raw Material Baghouse") Baghouse dust pneumatically conveyed to 100 Cu. Yd. Tank No. 1 (E24)	+	F	
Finished End Material Handling Equipment (POST KILNS)	218,280 TPY Aggregate	F	218,280 TPY Aggregate
1 - Martin Finished Product Screw Conveyor No. K-3 (E36)	+	F	+
1 - Martin Finished Product Screw Conveyor No. K-4 (E37)	+	F	+
1 - Martin Finished Product Bucket Elevator No. K-3 (E38) Finished End Baghouse control	+	F	+

TABLE NO. 3

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT			
Permit to Operate No. 00036			
Permitted Throughput/Consumption Limits			
Equipment	Throughput/Emission Permit Limit	District (D)/ Federal(F) Enforceable	Calculation Throughput
1 - Martin Finished Product Bucket Elevator No. K-4 (E39) Finished End Baghouse control	+	F	+
1 - Custom-Made Aggregate Cooler No. 3 (E15 ¹)	+	F	+
1 - Custom-Made Aggregate Cooler No. 4 (E16 ¹)	+	F	+
1 - Syntron Finished Product Vibrating Belt Conveyor No. K-3 (E17)	+	F	+
1 - Syntron Finished Product Vibrating Belt Conveyor No. K-4 (E18)	+	F	+
1 - Tower Shaker Finished Product 2-Deck Screen, Scalping (E19)	+	F	+
1 - Tyler-Niagra Chute (E20) Finished End Baghouse control	+	F	+
1 - Finished Product Vertical Impact Crusher (E30) Finished End Baghouse control	+	F	+
1 - Symons No. 3 Finished Product 1-Deck Clay Screen (E34) Finished End Baghouse control	+	F	+
1 - Overstrom Finished Product 4' x 8' 1-Deck Screen (E22) Baghouse control	+	F	+
1 - O'Brien Finished Product 1-Deck Screen (E23) Baghouse control	+	F	+
1 - Yogi Finished Product 2-Deck Screen (E21) Finished End Baghouse control	+	F	+
1 - 115 Cu. Yd. Finished Product Tank No. 4 (E29) (Out of Service)	+	F	+
1 - Rex Finished Product Bucket Elevator (E33) (Out of Service)	+	F	+
1 - Finished End Belt Conveyor (No. 46)	+	F	+
2 - Finished End Belt Conveyors (Nos. 25, 26)	+	F	+
6 - Finished End Belt Conveyors (Nos. 33, 34, 45, 47-49)	+	F	+
1 - Finished End Radial Stacking Conveyor (No. 29) Superior, Inc. 24"x100', Model F24X100PRSC, Serial No. U880633	+	F	+
1 - Finished End Belt Conveyor (No. 30) (Out of Service)	+	F	+
2 - Finished End Belt Conveyors (Nos. 54 ¹ , 55 ¹) Baghouse controlled	+	F	+
13 - Finished End Belt Conveyors (Nos. 28, 31-32, 35-44)	+	F	+
1 - Finished Product Deflection Plate (At End of Load-Out Conveyors)	+	F	+
1 - "Finished End Baghouse" with Screw Conveyor and pulse jet cleaning system, controlling emissions from the Vertical Impact Crusher (E30); K3 & K4 Bucket Elevators (E38 (E39); Conveyor Nos. 54 & 55; Screen Nos. E21, E22, E23, E34; and Tyler Niagra Chute (E20)	+	F	+
1 - Syntron Conveyor No. 4 (E40) (Out of Service)	+	F	+
Screening Plant (Portable)	1,080,000 TPY Material	F	1,080,000 TPY Material
1 - Receiving Hopper	*	F	*
1 - Screen	*	F	*
4 - Conveyors (Screen feed conveyor and three screen output conveyors)	*	F	*
Screening Plant (Portable) Powerscreen Chieftain 2100S 3 Deck Inline Screen	*	F	*
1 - Receiving Hopper	*	F	*
1 - 3 Deck Screen	*	F	*
6 - Conveyors	*	F	*
¹ - Equipped with water spray			
² - Compliance demonstrated with CEM system (see Attachment PO0036PC9)			
³ - Clay/Aggregate factor of 1.84 (218,280 ton aggregate*1.84 = 401,365 ton clay)			
+ - Included in the 218,200 TPY Aggregate Limit Above at Kilns			
* - Included in the 1,080,000 TPY Material Limit Above at the Screening Plant			

4. PERMITTED EMISSIONS TABLE

Purpose

The purpose of this table is to document the permitted emissions for this stationary source. Rule 29, "Conditions on Permits", requires permitted emissions to be included on each Permit to Operate. Rule 29 is not federally enforceable.

The permitted emissions table also characterizes the amount and type of criteria air pollutants emitted by this stationary source.

Rule 29 requires that annual permitted emissions be based on a 12 calendar month rolling period and be expressed in units of tons per year. Hourly permitted emissions are required to be expressed in units of pounds per hour. Permitted emissions for a stationary source are required to be determined by aggregating the permitted emissions for each emissions unit at the stationary source.

Enforceability of Permitted Emissions

The permitted emissions in the units of tons per year and pounds per hour listed in the permitted emissions table are not directly enforceable as permit conditions. Other permit conditions listed in the permit, however, are designed to limit the emissions from this stationary source to the limits in the table.

In general, permitted emissions are calculated based on throughput or consumption data for an emission unit, specific physical characteristics of the emission unit, and emission factors. The emission factors may be standard published emission factors or they may be derived from source test data or specific emission limits that apply to the emissions unit. In some cases, permitted emissions are expressed directly as a set of pollutants and emission limits in tons per year without reference to any calculation method.

Section No. 3, "Permitted Throughput and Consumption Limit Table", contains information on the throughput and consumption limits that are enforceable at this stationary source. In addition, other sections of this permit contain conditions that act to enforce specific portions of the permitted emissions table.

Equipment Description

This portion of the table is the same as the equipment description in the "Permitted Equipment and Applicable Requirements Table".

Tons Per Year

This column of the table represents the permitted emissions in units of tons per year for ROC (reactive organic compounds), NO_x (nitrogen oxides), PM (particulate matter), SO_x (sulfur oxides), and CO (carbon monoxide). In some cases, emissions of non-criteria pollutants of interest may also be listed. Pursuant to Rule 29, annual permitted emissions shall be the annual emissions used to determine compliance for issuance of any new or revised permit issued after October 22, 1991. For emissions units for which no new or revised permit has been issued since October 22, 1991, annual permitted emissions generally reflect actual historical emissions from the emissions unit.

The permitted emissions limit may apply to a single emissions unit or to a set of emission units. When the limit applies to set of emissions units, the set consists of the emissions unit with which the limit is listed and the emissions units which follow that have an asterisk in the pollutant columns.

Pounds Per Hour

This column of the table represents the permitted emissions in units of pounds per hour for ROC (reactive organic compounds), NO_x (nitrogen oxides), PM (particulate matter), SO_x (sulfur oxides), and CO (carbon monoxide). Pursuant to Rule 29, hourly permitted emissions shall be calculated based on the maximum quantity of each air pollutant which may be emitted from the emissions unit during a one hour period, as limited by any applicable rules or permit conditions.

Hazardous Air Pollutants

The Permit Summary and Statement of Basis does provide some information that characterizes the emissions of hazardous air pollutants (HAPS) from this facility. Additional information can be obtained from the facility's AB-2588, Air Toxics "Hot Spots", Report.

TABLE NO. 4

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT										
Permit to Operate No. 00036										
Permitted Emissions										
Equipment	TONS PER YEAR					POUNDS PER HOUR				
	ROC	NOx	PM	SOx	CO	ROC	NOx	PM	SOx	CO
MATTLETV Permits\00036\PERMIT\Tables_00036-rev321,331										
2 - 36,1 MMBTU/Hr NG Aggregate Kilns, Nos. 3 & 4 (E13 & E14) Equipped with the following control systems: 2 - 32,000 ACFM Fuller "Plenum Pulse" Baghouses with 8,000 square feet cloth area (one at each kiln) for particulate matter control A Lime Injection System consisting of one lime storage silo (80 Cu. Yd.) with bin vent dust collector, three feed hoppers, three rotary feeders, and two lime injection pipelines that feed powdered lime to each kiln for SOx control Fuel Combustion Emissions From Kiln Nos. 3 & 4 Combined Fuel Combustion & Process Emissions From Kiln Nos. 3 & 4	1.70	55.90	29.99	63.55	164.47	0.38	12.48	11.10	15.89	36.74
Kiln Baghouse Dust Handling System consisting of: Pneumatic pipelines from kiln baghouses to 100 Cu. Yd. Tank 1 - 100 Cu. Yd. Tank No. 1 (E24) with bin vent dust collector 1 - Martin Screw Conveyor 1 - Covered Belt Conveyor (No. 28)			<0.01					<0.01		
Kiln Material Handling (from Raw Material Tank Nos. 3 & 4 to Kilns) 1 - Kiln Material Belt #16 K-3 Feeder 1 - Kiln Material Belt #18 K-4 Feeder 1 - Kiln Material Belt #25 K-3 Incline 1 - Kiln Material Belt #22 K-4 Short Incline 1 - Kiln Material Belt #21 K-4 Long Incline			<0.01					<0.01		
Raw Material Handling Equipment (prior to kilns) 1 - Grizzly Raw Material Receiving Hopper (E37) 1 - Raw Material Receiving Hopper, Standby (E38) 1 - Raw Material Inside Feed Belt Conveyor (No. 15), part of standby feed system 1 - Syntron Raw Material Vibrating Belt Conveyor (E1 - East) 1 - Syntron Raw Material Vibrating Belt Conveyor (E2 - West) 1 - J.C. Steele Disintegrator - Raw Material Crusher, Model 6B18-19A, (E5) Baghouse controlled 1 - Symons No. 1 Raw Material Screen (E7), Baghouse controlled 1 - Symons No. 2 Raw Material Clay Screen (E9), Baghouse controlled Extrusion Process Using Diesel Fuel No. 2 or Biodiesel as an Additive 1 - Raw Material Extruder Hopper (E39) 1 - J.C. Steele 50F Pug Sealer / Pug Mill (E19) Model Mark 8, Serial No. 720515 1 - J.C. Steele 90A Raw Material Extruder (E20) Model AZ, Serial No. 631122 1 - Pellet Hopper (E40) 8 - Raw Material Belt Conveyors Nos. 4, 11, 12, 13, 14, 16, 17, 18 Baghouse controlled No. 4 Disintegrator Feed Belt No. 11 Symons Screen No. 2 Discharge No. 12 Symons Screen No. 1 Discharge No. 13 Symons Screen Tail Belt No. 14 Loop Belt No. 16 Hopper Feed Belt No. 17 Pug Mill Feed Belt No. 18 Pug Mill Feeder Belt 3 - Raw Material Belt Conveyors Nos. 21, 22, 23 No. 21 Extruder Tail Belt No. 22 To Raw Material Tank Nos. 3 and 4 No. 23 To Raw Material Tank Nos. 3 and 4 1 - 350 Cu.Yd. Raw Material Tank No. 3 (E41) 1 - 350 Cu.Yd. Raw Material Tank No. 4 (E42) 1 - Baghouse Dust Dump Screw Auger (E28) 1 - 40,000 cfm Industrial Clean Air Baghouse, Model #41-71S, Serial No. N5405, (E29) Four Compartments, 100 bags each, reverse pulse air, controlling emissions from E5, E7, E9, and Conveyor Nos. 4, 11, 12, 13, 14, 16, 17, and 18 ("Raw Material Baghouse") Baghouse dust pneumatically conveyed to 100 Cu. Yd. Tank No. 1 (E24)			0.01					<0.01		
Finished End Material Handling Equipment (post kilns) 1 - Martin Finished Product Screw Conveyor No. K-3 (E36) 1 - Martin Finished Product Screw Conveyor No. K-4 (E37) 1 - Martin Finished Product Bucket Elevator No. K-3 (E38) Finished End Baghouse control 1 - Martin Finished Product Bucket Elevator No. K-4 (E39) Finished End Baghouse control 1 - Custom-Made Aggregate Cooler No. 3 (E15 ¹) 1 - Custom-Made Aggregate Cooler No. 4 (E16 ¹) 1 - Syntron Finished Product Vibrating Belt Conveyor No. K-3 (E17) 1 - Syntron Finished Product Vibrating Belt Conveyor No. K-4 (E18) 1 - Tower Shaker Finished Product 2-Deck Screen, Scalping (E19) 1 - Tyler-Niagra Chute (E20) Finished End Baghouse control 1 - Finished Product Vertical Impact Crusher (E30) Finished End Baghouse control 1 - Symons No. 3 Finished Product 1-Deck Clay Screen (E34) Finished End Baghouse control			<0.01					<0.01		

TABLE NO. 4

VENTURA COUNTY AIR POLLUTION CONTROL DISTRICT										
Permit to Operate No. 00036										
Permitted Emissions										
Equipment	TONS PER YEAR					POUNDS PER HOUR				
	ROC	NOx	PM	SOx	CO	ROC	NOx	PM	SOx	CO
MATILEVTV Permits\PO0036\PERMIT\Tables_00036-rev321,331										
1 - Overstrom Finished Product 4' x 8' 1-Deck Screen (E22) Baghouse control			0.01					<0.01		
1 - O'Brien Finished Product 1-Deck Screen (E23) Baghouse control			0.01					<0.01		
1 - Yogi Finished Product 2-Deck Screen (E21) Finished End Baghouse control			0.01					<0.01		
1 - 115 Cu. Yd. Finished Product Tank No. 4 (E29) (Out of Service)			<0.01					<0.01		
1 - Rex Finished Product Bucket Elevator (E33) (Out of Service)			<0.01					<0.01		
1 - Finished End Belt Conveyor (No. 46)			<0.01					<0.01		
2 - Finished End Belt Conveyors (Nos. 25, 26)			<0.01					<0.01		
6 - Finished End Belt Conveyors (Nos. 33, 34, 45, 47-49)			0.04					<0.01		
1 - Finished End Radial Stacking Conveyor (No. 29) Superior, Inc. 24"x100', Model F24X100PRSC, Serial No. U880633			<0.01					<0.01		
1 - Finished End Belt Conveyor (No. 30) (Out of Service)			0.01					<0.01		
2 - Finished End Belt Conveyors (Nos. 54 ¹ , 55 ¹) Baghouse controlled			<0.01					<0.01		
13 - Finished End Belt Conveyors (Nos. 28, 31-32, 35-44)			0.02					<0.01		
1 - Finished Product Deflection Plate (At End of Load-Out Conveyors)			<0.01					<0.01		
1 - "Finished End Baghouse" with Screw Conveyor and pulse jet cleaning system, controlling emissions from the Vertical Impact Crusher (E30); K3 & K4 Bucket Elevators (E38) & (E39); Conveyor Nos. 54 & 55; Screen Nos. E21, E22, E23, E34; and Tyler Niagra Chute (E20)			0.01					<0.01		
1 - Syntron Conveyor No. 4 (E40) (Out of Service)										
Screening Plant (Portable)			0.54					0.48		
1 - Receiving Hopper										
1 - Screen										
4 - Conveyors (Screen feed conveyor and three screen output conveyors)										
Screening Plant (Portable) Powerscreen Chieftain 2100S 3 Deck Inline Screen			*					0.56		
1 - Receiving Hopper			*							
1 - 3 Deck Screen			*							
6 - Conveyors			*							
¹ - Equipped with water spray										
* - Included in process SOx or PM emissions above										
Total Permitted Emissions	1.70	55.90	30.80	63.55	164.47	0.38	12.48	12.18	15.89	36.74

5. INSIGNIFICANT ACTIVITIES

Rule 33.2.A.3 (Part 70 Permits - Application Contents) requires the applicant to provide a list of all emissions units located at the stationary source that are exempt from permit pursuant to Rule 23 based on size or production rate. Pursuant to Rule 33.2.A.3, emissions from insignificant activities do not need to be included in the permit application.

This section of the permit contains a table entitled "Insignificant Activities". This table is a list of insignificant activities at the facility that are exempt from permit based on a size or production rate exemption in Rule 23, "Exemptions From Permit". Insignificant Activity is defined in Rule 33.1 (Part 70 Permits – Definitions). The permittee shall provide calculations, usage records, emission records, and/or operational data as necessary to substantiate an activity as insignificant.

This table is presented for informational purposes only. Changes to this list are not considered to be permit modifications, nor is the list considered to be enforceable. As detailed in Rule 33.2.A.3, this list is required to be submitted with an application for permit reissuance. The term "exempt from permit" means that the emissions from the insignificant activity are not required to be included in Table No. 4 and that the insignificant activity does not have an associated throughput or consumption limit in Table No. 3. However, the insignificant activity may be subject to various rules and regulations. The general requirements listed in Section No. 8 of this permit may apply to these insignificant activities.

Ventura County Air Pollution Control District
INSIGNIFICANT ACTIVITIES
Part 70 Permit No. 00036

INSIGNIFICANT ACTIVITIES	BASIS FOR EXEMPTION (Size/Production Rate)	RULE 23 CITATION
1 – Diesel-Fired Power Mate Generator used as backup power for the scales (10 BHP)	Maximum design rating < 50 BHP	23.D.6
3 - Gasoline-Fired Welding Machines (1 – 20 HP trailer-mounted Lincoln 300, 1 – 20 HP truck-mounted Lincoln 300, and 1 – 16 HP truck-mounted Lincoln 200)	Maximum design rating < 50 BHP	23.D.6
1 – 550-Gallon Gasoline Storage Tank	Tank capacity ≤ 550 Gal and equipped with a submerged fill pipe and is not required to have a vapor recovery system	23.F.1
1 – Diesel Fired Welding Machine (44.2 BHP truck-mounted Lincoln)	Maximum design rating < 50 BHP	23.D.6
1 – Space / water heater	Maximum design rating < 1 MMBTU/hr	23.C.1
Coating operations (other than mobile vehicle or mobile equipment coating)	Emissions less than 200 lb each of ROC, methylene chloride, 1,1,1-TCA, and perchloroethylene during a rolling 12-month period	23.F.11.b
2 – 7,000 gallon biodiesel storage tanks (#1 and #2)	Any tank or container used to hold or store reactive organic compound liquids, except gasoline and crude oil, that is not required to have reactive organic compound vapor emission controls	23.F.21
1 – 15,000 gallon biodiesel storage tank	Any tank or container used to hold or store reactive organic compound liquids, except gasoline and crude oil, that is not required to have reactive organic compound vapor emission controls	23.F.21
2 – 2,000 gallon red-dyed diesel storage tanks (#1 and #2)	Any tank or container used to hold or store reactive organic compound liquids, except gasoline and crude oil, that is not required to have reactive organic compound vapor emission controls	23.F.21
1 – 7,000 gallon red-dyed diesel storage tank	Any tank or container used to hold or store reactive organic compound liquids, except gasoline and crude oil, that is not required to have reactive organic compound vapor emission controls	23.F.21

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6. SPECIFIC APPLICABLE REQUIREMENTS (ATTACHMENTS)

As discussed in Section No. 2, "Permitted Equipment and Applicable Requirements Table", the emissions units at this stationary source listed in the table have requirements that are specifically applicable to them. The applicable requirements are based on the District's prohibitory rules, State of California ATCM's, federal NSPS (40 CFR Part 60), federal NESHAPS (40 CFR Part 61), and federal NESHAPS/MACT (40 CFR Part 63).

In this section of the permit, the permit conditions that are associated with each specific applicable requirement are listed in an individual attachment. The attachment is identified with the label "Attachment (APCD Rule No. or CFR No.) #" in the lower left corner. Each attachment has an applicability section that describes how and why this attachment applies to the specific emissions unit. The attachment may apply to one or more of the emissions units listed in the Permitted Equipment and Applicable Requirements Table in Section No. 2.

**Ventura County Air Pollution Control District
New Source Performance Standards
40 CFR Part 60 Subpart OOO Applicable Requirements
Standards of Performance for Nonmetallic Mineral Processing Facilities
Equipment Installed After August 31, 1983 and Before April 22, 2008**

**40 CFR Part 60, "Standards of Performance for New Stationary Sources"
40 CFR Part 60, Subpart A, "General Provisions"
40 CFR Part 60, Subpart OOO, "Standards of Performance for Nonmetallic Mineral Processing Facilities"
Federally-Enforceable**

Applicability:

This attachment describes the requirements of 40 CFR Part 60 Subpart OOO, "Standards of Performance for Nonmetallic Mineral Processing Facilities", and 40 CFR Part 60 Subpart A, "General Provisions", and applies to fixed nonmetallic mineral processing plants with capacities greater than 25 tons per hour as follows: each crusher, grinding mill, screening operation, bucket elevator, belt conveyor, bagging operation, storage bin, enclosed truck or railcar loading station which commenced construction, reconstruction, or modification after August 31, 1983 and prior to April 22, 2008. The Ventura County APCD has been delegated authority for 40 CFR Part 60 Subpart OOO and is considered to be the Administrator.

Conditions:

1. No stack emissions from any transfer point on belt conveyors or from any other affected facility shall be discharged into the atmosphere which:
 - a) Contain particulate matter in excess of 0.05 grams per dry cubic meter at standard conditions (g/dscm); and
 - b) Exhibit greater than 7 percent opacity, unless the stack emissions are discharged from an affected facility using a wet scrubbing control device. (60.672(a))
2. Fugitive emissions from belt conveyor transfer points shall not exhibit greater than 10 percent opacity. (60.672(b))
3. Fugitive emissions from a crusher, at which a capture system is not used, shall not exhibit greater than 15 percent opacity. (60.672(b))
4. If any transfer point on a conveyor belt or any other affected facility is enclosed in a building, then each enclosed affected facility must comply with the above emission limits of this attachment or the building enclosing the affected facility or facilities must have no

visible emissions except emissions from a vent. The vent shall comply with the emission limits of Condition No. 1. (60.672(e))

5. Stack emissions from baghouses that control emissions from only an individual, enclosed storage bin shall not exhibit greater than 7 percent opacity. (60.672(f))
6. Stack emissions from multiple storage bins with combined stacks shall comply with the emission limits of Condition No. 1. (60.672(a))
7. The emission concentration and opacity limits of 40 CFR Part 60, Subpart OOO shall not apply under the following circumstances:
 - a). Truck dumping of nonmetallic minerals into any screening operation, feed hopper, or crusher (60.672(d))
 - b). During periods of startup, shutdown, and malfunction (60.8(c))
8. The permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative. (60.7(b))
9. Upon request by the District, the permittee shall perform emissions tests to determine compliance with the emission limits and opacity requirements. The following test methods shall be used:
 - a). EPA Method 5 or Method 17 shall be used to determine compliance with the 0.05 g/dscm emission limit required by Condition No. 1. The sample volume shall be at least 1.70 dscm (60 dscf). For Method 5, if the gas stream being sampled is at ambient temperature, the sampling probe and filter may be operated without heaters. If the gas stream is above ambient temperature, the sampling probe and filter may be operated at a temperature high enough, but no higher than 121 °C (250 °F), to prevent water condensation on the filter. (60.8 and 60.675(b)(1))
 - b). EPA Method 9 and the procedures in 40 CFR Part 60.11 shall be used to determine compliance with the above opacity requirements. The following procedures shall also be followed:
 - (i) The minimum distance between the observer and the emission source shall be 4.57 meters (15 feet).
 - (ii) The observer shall, when possible, select a position that minimizes interference from other fugitive emission sources (e.g. road dust). The required observer position relative to the sun (Method 9, Section 2.1) must be followed.
 - (iii) For affected facilities using wet dust suppression for particulate control, a visible mist is sometimes generated by the spray. The water mist must not

be confused with particulate matter emissions and is not to be considered a visible emission. When a water mist of this nature is present, the observation of emissions is to be made at a point in the plume where the mist is not longer visible.

(60.675(c)(1))

Refer to Sections 60.675(c)(2) and 60.675(c)(3) for situations in which the duration of the Method 9 observations can be shortened.

- c) EPA Method 22 shall be used to determine compliance with the fugitive emission limits of Condition No. 4. The performance test shall be conducted while all affected facilities inside the building are operating. The performance test for each building shall be at least 75 minutes in duration, with each side of the building and the roof observed for at least 15 minutes. (60.675(d))
10. A wet scrubber used to control emissions at an affected facility shall be equipped and operated with the following calibrated monitoring devices:
 - a) A device for the continuous measurement of the pressure loss of the gas stream through the scrubber. The monitoring device must be certified by the manufacturer to be accurate within ± 250 pascals (± 1 inch) water gauge pressure and must be calibrated on an annual basis in accordance with manufacturer's instructions. (60.674(a)(1))
 - b) A device for the continuous measurement of the scrubbing liquid flow rate to the wet scrubber. The monitoring device must be certified by the manufacturer to be accurate within ± 5 percent of design scrubbing liquid flow rate and must be calibrated on an annual basis in accordance with manufacturer's instructions. (60.674(a)(1))
 11. The permittee shall maintain records of the continuous monitoring at the wet scrubber. On a daily basis, the permittee shall record the measurements of both the change in pressure of the gas stream across the scrubber and the scrubbing liquid flow rate. The permittee shall submit semiannual reports to the District of occurrences when the measurements of the scrubber pressure loss (or gain) and liquid flow rate differ by more than ± 30 percent from the average determined during the most recent performance test. The semiannual reports shall be submitted 30 days following the second and fourth calendar quarters. (60.676(c), 60.676(d), and 60.676(e))
 12. The permittee shall submit written reports to the District of the results of all performance tests conducted to demonstrate compliance with the emission concentration and opacity limits set forth in this permit attachment, including Method 9 and Method 22 observations. (60.676(f))
 13. The permittee shall report to the District any change in the process material from saturated material to unsaturated material within 30 days following such change. At the

time of such change, the screening operation, bucket elevator, or belt conveyor becomes subject to the opacity standards. (60.676(g))

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**Ventura County Air Pollution Control District
New Source Performance Standards
40 CFR Part 60 Subpart OOO Applicable Requirements
Standards of Performance for Nonmetallic Mineral Processing Facilities
Equipment Installed After April 22, 2008**

**40 CFR Part 60, "Standards of Performance for New Stationary Sources"
40 CFR Part 60, Subpart A, "General Provisions"
40 CFR Part 60, Subpart OOO, "Standards of Performance for Nonmetallic Mineral Processing Facilities"
Federally-Enforceable**

Applicability:

This attachment describes the requirements of 40 CFR Part 60 Subpart OOO, "Standards of Performance for Nonmetallic Mineral Processing Facilities", and 40 CFR Part 60 Subpart A, "General Provisions", and applies to fixed nonmetallic mineral processing plants with capacities greater than 25 tons per hour as follows: each crusher, grinding mill, screening operation, bucket elevator, belt conveyor, bagging operation, storage bin, enclosed truck or railcar loading station which commenced construction, reconstruction, or modification after April 22, 2008. The Ventura County APCD has been delegated authority for 40 CFR Part 60 Subpart OOO and is considered to be the Administrator.

Conditions:

1. No stack emissions from any transfer point on belt conveyors or from any other affected facility shall be discharged into the atmosphere which contain particulate matter in excess of 0.032 grams per dry cubic meter at standard conditions (g/dscm). (60.672(a))
2. Fugitive emissions from belt conveyor transfer points shall not exhibit greater than 7 percent opacity. (60.672(b))
3. Fugitive emissions from a crusher, at which a capture system is not used, shall not exhibit greater than 12 percent opacity. (60.672(b))
4. If any transfer point on a conveyor belt or any other affected facility is enclosed in a building, then each enclosed affected facility must comply with the above emission limits of this attachment or the building enclosing the affected facility or facilities must have no visible emissions except emissions from a vent. The vent shall comply with the emission limits of Condition No. 1. (60.672(e))
5. Stack emissions from baghouses that control emissions from only an individual, enclosed storage bin shall not exhibit greater than 7 percent opacity. (60.672(f))

6. The emission concentration and opacity limits of 40 CFR Part 60, Subpart OOO shall not apply under the following circumstances:
 - a) Truck dumping of nonmetallic minerals into any screening operation, feed hopper, or crusher (60.672(d))
 - b) During periods of startup, shutdown, and malfunction (60.8(c))
7. The permittee shall maintain records of the occurrence and duration of any startup, shutdown, or malfunction in the operation of an affected facility; any malfunction of the air pollution control equipment; or any periods during which a continuous monitoring system or monitoring device is inoperative. (60.7(b))
8. Upon request by the District, the permittee shall perform emissions tests to determine compliance with the emission limits and opacity requirements. The following test methods shall be used:
 - a) EPA Method 5 or Method 17 shall be used to determine compliance with the 0.05 g/dscm emission limit required by Condition No. 1. The sample volume shall be at least 1.70 dscm (60 dscf). For Method 5, if the gas stream being sampled is at ambient temperature, the sampling probe and filter may be operated without heaters. If the gas stream is above ambient temperature, the sampling probe and filter may be operated at a temperature high enough, but no higher than 121 °C (250 °F), to prevent water condensation on the filter. (60.8 and 60.675(b)(1))
 - b) EPA Method 9 and the procedures in 40 CFR Part 60.11 shall be used to determine compliance with the above opacity requirements. The following procedures shall also be followed:
 - (i) The minimum distance between the observer and the emission source shall be 4.57 meters (15 feet).
 - (ii) The observer shall, when possible, select a position that minimizes interference from other fugitive emission sources (e.g. road dust). The required observer position relative to the sun (Method 9, Section 2.1) must be followed.
 - (iii) For affected facilities using wet dust suppression for particulate control, a visible mist is sometimes generated by the spray. The water mist must not be confused with particulate matter emissions and is not to be considered a visible emission. When a water mist of this nature is present, the observation of emissions is to be made at a point in the plume where the mist is not longer visible.
(60.675(c)(1))
Refer to Sections 60.675(c)(2) and 60.675(c)(3) for situations in which the duration of the Method 9 observations can be shortened.
 - c) EPA Method 22 shall be used to determine compliance with the fugitive emission limits of Condition No. 4. The performance test shall be conducted while all

affected facilities inside the building are operating. The performance test for each building shall be at least 75 minutes in duration, with each side of the building and the roof observed for at least 15 minutes. (60.675(d))

9. On a monthly basis, the permittee shall inspect all water sprays equipment to ensure that it is operating properly. Any necessary repairs shall be initiated within 24 hours and completed as expediently as possible. The permittee shall record the date of each inspection and any corrective action taken in a log book. (60.674(b) and 60.676(b)(1))
10. A wet scrubber used to control emissions at an affected facility shall be equipped and operated with the following calibrated monitoring devices:
 - a) A device for the continuous measurement of the pressure loss of the gas stream through the scrubber. The monitoring device must be certified by the manufacturer to be accurate within ± 250 pascals (± 1 inch) water gauge pressure and must be calibrated on an annual basis in accordance with manufacturer's instructions. (60.674(a)(1))
 - b) A device for the continuous measurement of the scrubbing liquid flow rate to the wet scrubber. The monitoring device must be certified by the manufacturer to be accurate within ± 5 percent of design scrubbing liquid flow rate and must be calibrated on an annual basis in accordance with manufacturer's instructions. (60.674(a)(1))
11. The permittee shall maintain records of the continuous monitoring at the wet scrubber. On a daily basis, the permittee shall record the measurements of both the change in pressure of the gas stream across the scrubber and the scrubbing liquid flow rate. The permittee shall submit semiannual reports to the District of occurrences when the measurements of the scrubber pressure loss (or gain) and liquid flow rate differ by more than ± 30 percent from the average determined during the most recent performance test. The semiannual reports shall be submitted 30 days following the second and fourth calendar quarters. (60.676(c), 60.676(d), and 60.676(e))
12. The permittee shall submit written reports to the District of the results of all performance tests conducted to demonstrate compliance with the emission concentration and opacity limits set forth in this permit attachment, including Method 9 and Method 22 observations. (60.676(f))
13. The permittee shall report to the District any change in the process material from saturated material to unsaturated material within 30 days following such change. At the time of such change, the screening operation, bucket elevator, or belt conveyor becomes subject to the opacity standards. (60.676(g))

7. PERMIT SPECIFIC CONDITIONS (ATTACHMENTS)

As discussed in Section No. 2, "Permitted Equipment and Applicable Requirements Table", the emissions units at this stationary source listed in the table have requirements that are specifically applicable to them. The applicable requirements are primarily based on Rule 26, "New Source Review" requirements (e.g., BACT and offset requirements), or Rule 29, "Conditions on Permits" requirements (e.g., throughput recordkeeping requirements, specific requirements that limit emissions, etc.). These requirements are in addition to the specific applicable requirements listed in Section No. 6.

In this section of the permit, the permit conditions that are associated with each specific applicable requirement are listed in an individual attachment. The attachment is identified with the label "Attachment PO (Title V Permit No.) PC#" in the lower left corner. Each attachment has an applicability section that describes how and why this attachment applies to the specific emissions unit. The attachment may apply to one or more of the emissions units listed in the Permitted Equipment and Applicable Requirements Table in Section No. 2.

Ventura County Air Pollution Control District
Permit Specific Conditions
Recordkeeping and Solvent Cleaning

Rule 26, “New Source Review”

Rule 29, “Conditions on Permits”

Conditions applied pursuant to Rule 26 are federally enforceable and conditions applied pursuant to Rule 29 are District enforceable only.

Applicability:

This attachment applies to this stationary source in general. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. In order to comply with the throughput and consumption limits of this permit, the permittee shall maintain monthly records of throughput and consumption as detailed in Section No. 3, “Permitted Throughput and Consumption Limit Table”, of this permit. The monthly records shall be summed for the previous 12 months. Throughput or consumption totals for any of these 12 calendar month rolling periods in excess of the specified limit shall be considered a violation of this permit. This is a general throughput and consumption recordkeeping condition and applies unless another throughput and consumption recordkeeping condition appears in this section of the permit. Note that there are more specific throughput and consumption recordkeeping conditions in Permit Attachments PO00036PC2, PO00036PC3, PO00036PC5, PO00036PC9, PO00036PC11. (Rule 26)

2. For solvent cleaning activities, including wipe cleaning, permittee shall maintain monthly records of solvent purchase and usage along with records of solvent that is recycled or disposed of properly.

Pursuant to Rule 23.F.7, the use of solvents, in addition to the use of coatings, adhesives, lubricants, and sealants; for facility and building maintenance and repair is exempt from permit. However, the use of such materials by contractors for the maintenance and repair of process and industrial equipment is not exempt from permit pursuant to Rule 23.F.7, unless the material is exempted under another specific section of Rule 23. Pursuant to Rule 23.F.6, the use of non-refillable aerosol cans is exempt from permit. Pursuant to Rule 23.F.10, the use of cleaning agents certified by the SCAQMD as Clean Air Solvents (Rule 23.F.10.a) and the use of cleaning agents that contain no more than 25 grams per liter of ROC as used or applied, and no more than 5 percent by weight combined of

methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, and chloroform (Rule 23.F.10.b), is also exempt from permit. Materials exempted from permit pursuant to Rule 23.F.6, Rule 23.F.7, Rule 23.F.10.a, and Rule 23.F.10.b do not need to be included in the monthly records.

The monthly records shall be summed for the previous 12 months. Net solvent usage totals for any of these 12 calendar month rolling periods in excess of the Rule 23.F.10.d exemption limit shall be considered a violation of this permit.

This permit does not limit the usage of acetone. Acetone is exempt from permit and record keeping requirements, as it is not defined as a reactive organic compound. (Rule 29)

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**Ventura County Air Pollution Control District
Permit Specific Conditions
Kiln No. 3 and Kiln No. 4
Gas Consumption, NOx, and CO Emission Limits**

Rule 26, "New Source Review"

Conditions applied pursuant to Rule 26 are federally enforceable.

**Rule 68, "Carbon Monoxide"
Adopted 04/13/04, Federally-Enforceable**

**Rule 103, "Continuous Monitoring Systems"
Adopted 02/09/99, Federally-Enforceable**

Applicability:

This attachment applies to Kiln No. 3 and Kiln No. 4 at this stationary source. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. As stated in Section No. 3 of this permit, "Permitted Throughput and Consumption Limit Table", the annual natural gas consumption in Kiln No. 3 and Kiln No. 4 shall not exceed 308 million standard cubic feet (MMSCF) per year per kiln. This permit does not authorize the use of fuel oil or distillate fuel as a fuel to fire the kilns.

In order to comply with this condition, the permittee shall maintain daily records of natural gas consumption for each kiln. The daily natural gas consumption for Kiln No. 4 shall be monitored and recorded using the Kiln No. 4 dedicated meter. The daily natural gas consumption for Kiln No. 3 shall be monitored and recorded using the facility main gas meter and subtracting out the consumption recorded by the Kiln No. 4 dedicated meter. The daily records shall be compiled into monthly natural gas consumption records for each kiln. The monthly records shall be summed for the previous 12 months. Natural gas consumption totals for any of these 12 calendar month rolling periods in excess of the specified limit shall be considered a violation of this permit. The natural gas consumption records shall be kept onsite at the facility, shall be made available to the District upon request, and shall be submitted with the annual compliance certification.
(Rule 26)

2. The following NO_x and CO emission limits at the kilns shall not be exceeded:

	<u>Kiln No. 3</u>	<u>Kiln No. 4</u>	<u>Units</u>	<u>Rule</u>
a. NO _x :	6.9	5.6	lbs/hr	26
b. CO	2,000	2,000	ppmvd	68

As stated, the NO_x limit is in units of pounds per hour (lbs/hr); and the CO limit is in units of parts per million by volume measured on a dry basis at standard conditions (ppmvd).

Compliance with these emission limits shall be monitored by the continuous emissions monitors required by Condition No. 3. (Rule 26 and Rule 68)

3. Pursuant to Rule 103, "Continuous Monitoring Systems", Section A.4, the permittee shall operate a CEMS (Continuous Emission Monitoring System) for measurement of NO_x and CO emissions from each kiln. The CEMS shall measure the concentration (by volume) and calculate the emission rate (in pounds per hour) of NO_x, measured as nitrogen dioxide (NO₂), and CO. The CEMS shall be installed, calibrated, operated, and maintained pursuant to 40 CFR Part 51, Appendix P, Sections 3.0 through 3.9.5. The CEMS shall be designed to complete one cycle of operation (sampling, analyzing, and data recording) every 15 minutes. The concentration and emission rate shall each be recorded as a one (1) hour average. A valid hourly average shall have at least two data points. (Rule 103)
4. Pursuant to Rule 103.B.2, the permittee shall maintain permanent continuous monitoring records. The records shall be in a form suitable for inspection, shall be made available to the District upon request, and shall include:
 - a. The date, time and duration of any startup, shutdown or malfunction in the operation of any affected facility.
 - b. The results of performance testing, evaluations, calibrations, checks, adjustments, and maintenance of any continuous emission monitors that have been installed pursuant to Rule 103.
 - c. Hourly average NO_x and CO concentrations in ppmv, at each kiln, as measured by the CEM system.
 - d. Hourly average pounds per hour NO_x and CO emissions at each kiln, as measured by the CEM system.
5. Pursuant to Rule 103.B.1, the permittee shall report any violation of any applicable monitored emission standard in writing to the District within 96 hours of each occurrence. Upon receipt, the District shall transmit the violation report to the state within five working days.

6. Pursuant to Rule 103.B.5(c), continuous emission monitoring data shall be reduced according to the procedure established in 40 CFR, Part 51, Appendix P, paragraphs 5.0 through 5.3.3, or by other methods determined to be equivalent by the District, the Air Resources Board, and the Environmental Protection Agency.

7. Relative Accuracy testing shall be conducted for the NO_x and CO continuous emission monitoring system once every 12 months (annually). The testing shall take place between May 1st and October 31st. This test shall be conducted by an independent contractor. The testing shall be conducted pursuant to 40 CFR, Part 60, Appendix B, Performance Specification 2, "Specifications and Test Procedures for SO₂ and NO_x Continuous Emission Monitoring Systems in Stationary Sources", Performance Specification 4, "Specifications and Test Procedures for Carbon Monoxide Continuous Emission Monitoring Systems in Stationary Sources", and Performance Specification 6, "Specifications and Test Procedures for Continuous Emission Rate Monitoring Systems in Stationary Sources". The testing shall be conducted at the expected maximum operating load of each kiln. The following test methods shall be used for the reference method testing: ARB Method 100 for NO_x, CO, and stack gas oxygen; ARB Method 2 for exhaust flow.

Prior to testing, a source test protocol shall be submitted to, and approved by, the District. The District shall be notified at least seven days prior to the emissions test and the test schedule shall be re-confirmed one working day in advance of the planned test. District personnel shall be allowed to observe the test.

A report of the test results shall be submitted to the District within 45 days after the completion of the tests. The test report shall indicate, for each kiln, the emissions of NO_x and CO in parts per million by volume and pounds per hour; the amount of excess oxygen in percent by volume; the fuel and exhaust flow rates in standard cubic feet per minute; the product feed rate; the relative accuracy of the continuous emission monitoring system in terms of parts per million by volume NO_x and CO, pounds per hour NO_x and CO, and exhaust flow rate.

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**Ventura County Air Pollution Control District
Permit Specific Conditions
Particulate Matter Emission Requirements
Kiln No. 3 and Kiln No. 4**

Rule 26, "New Source Review"

Conditions applied pursuant to Rule 26 are federally enforceable.

Rule 50, "Opacity"

Adopted 04/13/04, Federally-Enforceable

Rule 52, "Particulate Matter - Concentration (Grain Loading)"

Adopted 04/13/04, Federally-Enforceable

Rule 53, "Particulate Matter - Process Weight"

Adopted 04/13/04, Federally-Enforceable

40 CFR Part 64, "Compliance Assurance Monitoring"

Federally-Enforceable

**People of the State of California vs. Pacific Custom Materials, Inc. et al. Ventura County Superior Court Case No. 213707 January 12, 2004 Settlement Agreement
District Enforceable Only**

Applicability:

This attachment applies to Kiln No. 3 and Kiln No. 4, and their associated baghouse emission control systems, at this stationary source. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. As stated in Section No. 3 of this permit, "Permitted Throughput and Consumption Limit Table", aggregate processed (on a dry basis) by Kiln Nos. 3 and 4 shall not exceed the corresponding rates shown below:

Equipment	Aggregate Production Limit
Kiln No. 3 and Kiln No. 4	218,280 tons per year for combined use of kilns
Kiln No. 3	40,200 pounds per hour
Kiln No. 4	40,600 pounds per hour

In order to comply with this condition, the permittee shall maintain daily records of the tons of aggregate processed (on a dry basis) and the hours of operation for each kiln. The volume of material (cubic yards) entering the kilns shall be measured and recorded at the Kiln No. 3 and Kiln No. 4 Feeder Belts. The density of the material (pounds per cubic foot) discharged from the kilns shall be measured at least once a day and used to calculate the daily aggregate (tons) and hourly aggregate (pounds) processed on a dry basis. The daily records of the tons of aggregate processed shall be compiled into monthly and twelve-month rolling records, shall be maintained at the facility, and shall be submitted to the District with the annual compliance certification. Aggregate process rate totals for any twelve-month rolling period in excess of the specified limits shall be considered a violation of this condition. (Rule 26)

2. Particulate matter (PM) emissions from the baghouses on the aggregate kilns shall not exceed the following particulate matter emission limits:

Kiln No. 3	Kiln No. 4	Units
0.2748	0.2748	Pounds of PM per Ton of aggregate processed

Particulate Matter is defined as any material except uncombined water that exists in a finely divided form as a liquid or solid at standard conditions. (Rule 26, Rule 52, and Rule 53)

In order to comply with these emission limits, permittee shall perform a particulate matter source test on each kiln's baghouse no less than once every 12 months. The testing shall take place between May 1st and October 31st. CARB Method 5 shall be used for the source test. The total particulate catch shall include the filter catch, probe catch, impinger catch, and the solvent extract, as specified in CARB Method 5. The average of three source test runs shall be used to determine compliance. The tests shall be conducted at normal operating load. Prior to conducting an emissions test, permittee shall notify the APCD Compliance Division. Written notification, and a source test protocol subject to District approval, shall be submitted no less than 30 calendar days prior to the test. The emissions test report shall indicate the following parameters for each kiln at normal load: emissions of particulate matter in grains per cubic foot of dry gas at standard condition, in pounds per ton of aggregate processed, and in pounds per hour. The test report and results shall be submitted to the APCD Compliance Division within 45 days after the test. (Rule 26)

3. Kiln Nos. 3 and 4 shall not be operated unless each kiln's associated particulate matter emission collection and control system is operating in proper working condition. The collection and control system includes the baghouses, fans, exhaust ducts (upstream of the baghouses), and the baghouse pneumatic dust handling system. Each kiln shall also be equipped and operated with a particulate matter collection and re-injection system at the fire end of the kiln.

There shall be no visible emissions from the kiln cylinder bodies, kiln hoods, kiln seals, kiln collars or kiln exhaust ducts (upstream of the baghouses) and there shall be no visible emissions from the dust handling system as it transfers the baghouse dust into the extruder feed section of the plant. The conveyor that transfers the baghouse dust into the Extruder Building shall employ a metal cover that completely covers the conveyor.

The presence of visible emissions from the kiln cylinder bodies, kiln hoods, kiln seals, kiln collars, kiln exhaust ducts (upstream of the baghouses), or dust handling system shall be considered a failure of the associated particulate matter emission collection and control system to operate in proper working condition and shall be considered to be a violation of this permit condition.

Monitoring, recordkeeping, and reporting requirements for this condition are contained in Condition No. 5, specifically Condition No. 5.b.3, below. (Rule 26)

4. The permittee shall not discharge into the atmosphere any air contaminants for a period or periods aggregating more than three (3) minutes in any one (1) hour which are as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines, or equivalent to 20% opacity and greater, unless specifically exempted by Rule 50. (Rule 50)
5. Permittee shall observe the following baghouse inspection schedule:
 - a. On a daily basis:
 1. Note and record the pressure drop across each baghouse. Readings that are less than 3.0" inches water column (w.c.) or greater than 7.0" w.c. shall be investigated and corrective action shall be taken within 24 hours.
 2. Note and record the operating status of the baghouse leak detector as required by Condition No. 8.a below. If the baghouse leak detector is not operating, corrective action shall be taken within 24 hours.
 3. Perform an inspection to check the baghouse exhaust outlet and baghouse access doors for visible emissions. A record shall be kept of any occurrence of visible emissions other than uncombined water greater than zero percent for a period or periods aggregating more than three (3) minutes in any one (1) hour. These records shall include the date and time. If a visible emissions problem cannot be corrected within 24 hours, permittee shall provide verbal notification to the District within the subsequent 24 hours. These visible emissions records shall be maintained at the facility and submitted to the District upon request.

As an alternative, the permittee shall verify that there are no visible emissions for a period or periods aggregating more than three (3) minutes in any one (1) hour which are as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines, or equivalent to 20% opacity and greater, as determined by a person certified in reading smoke using EPA Method 9.

4. Observe the compressed air system for air leakage and proper operation of the pulse operation.
 5. Check the screw conveyor outlet to ensure that dust is being removed from the system.
- b. On a weekly basis:
1. Check cleaning sequence and cycle times for proper valve and timer operation.
 2. Check compressed air lines including oilers and filters.
 3. Inspect kiln cylinder bodies, kiln hoods, kiln seals, kiln collars and each inlet exhaust duct (from kiln to baghouse) for visible emissions. A record shall be kept of any occurrence of visible emissions other than uncombined water greater than zero percent for a period or periods aggregating more than three (3) minutes in any one (1) hour. These records shall include the date and time. If a visible emissions problem cannot be corrected within 24 hours, permittee shall provide verbal notification to the District within the subsequent 24 hours. These visible emissions records shall be maintained at the facility and submitted to the District upon request.
- c. At least four (4) times per calendar year, with at least sixty (60) days between inspections, the kilns and associated baghouses shall be shut down and:
1. The bags shall be checked for holes and the housing shall be inspected for holes and proper sealing.
 2. Inspect valve discs for warpage and inspect belt drives and screw augers.

All records required above shall be maintained at the facility and submitted to the District upon request. Corrective action shall be taken within 24 hours after detecting any deficiencies noted above. In addition to the records required above, a record of each

corrective action taken, including the date, equipment affected, duration of deficiency, and the corrective action taken, shall be maintained at the facility and submitted to the District upon request. (Rule 26, Rule 52, and Rule 53)

6. Permittee shall not discharge into the atmosphere, from the exhaust stacks Kiln No. 3 and Kiln No. 4, particulate matter in excess of the following limits:
 - a. Pursuant to Rule 52, a particulate matter concentration (grains per cubic foot of dry gas at standard conditions) in each stack exhaust as listed in the table shown in Rule 52 (Rule 52 Table).
 - b. Pursuant to Rule 53, a solid particulate matter discharge rate (pounds per hour) as listed in the table shown in Rule 53 (Rule 53 Table).

As defined in Rule 52 and Rule 53, particulate matter is any material, except uncombined water, that exists in a finely divided form as a liquid or solid at standard conditions. For the purposes of Rule 53, solid particulate matter exists as a solid at standard conditions and includes lead and lead compounds. (Rules 52 and 53)

7. In order to comply with Rule 52 and Rule 53, permittee shall comply with the particulate matter emission limits of Condition No. 2 above. Since the emission limits of Condition No. 2 have been shown to be more stringent than the applicable emission limitations of Rule 52 and Rule 53, no additional periodic monitoring requirements for Rule 52 and Rule 53 are required beyond the periodic monitoring requirements of the conditions above. (Rules 52 and 53).
8. Particulate matter emissions from Kiln Nos. 3 and 4 are subject to 40 CFR, Part 64, "Compliance Assurance Monitoring" (CAM). Pursuant to the CAM Plan submitted with the Part 70 Permit Reissuance application, the following indicators of compliance shall be used: (a) PM Intensity as indicated by a bag leak detection system; (b) Bag Condition; (c) Visible Emissions; (d) Baghouse Pressure Drop; and (e) Baghouse Temperature.

The permittee shall comply with all applicable requirements of 40 CFR, Part 64, "Compliance Assurance Monitoring". This includes, but is not limited to, the following:

- a. PM Intensity as indicated by a baghouse leak detector -

Each baghouse shall be equipped with a BHA Group, Inc. Model CPM 750 baghouse leak detector and data recorder system that measures particle flow using a beam of visible light through the baghouse exhaust. The rapid variation in light intensity is measured and reported in terms of "percentage of average light received". The baghouse leak detection system shall be maintained and operated pursuant to the manufacturer's specifications and suggested maintenance,

inspection and quality assurance / quality control program. This includes, but is not limited to, a semi-annual maintenance and inspection program recommended by and performed by the instrument manufacturer that includes inspecting the mounting flanges, optical sensors, microprocessor electronics, purge air system and filters, alignment of sensors, and if necessary, calibrating the detectors. Written reports summarizing this semi-annual inspection and maintenance procedure for each leak detector shall be maintained at the facility.

The BLDS (Baghouse Leak Detector System) alarm shall be set at 40% for each baghouse. A BLDS interference value of greater than 40 percent shall be defined as a CAM excursion. The permittee shall observe the baghouse(s) for visible emissions whenever the BLDS interference value exceeds 40 percent.

The bag leak detection data recording system shall take a reading every 15 seconds and record average readings over 1 minute and 3 minute intervals whenever the kilns are in operation. The permittee shall maintain a log of any excursions as defined above, including a notation of the visible emissions check and a summary of any corrective action taken. Such a log shall include the date, time and initials of the person performing the visible emissions check and/or any corrective measures.

b. Bag Condition -

Each baghouse shall be inspected and maintained pursuant to Condition No. 5 of this permit attachment. An excursion shall be defined as a failure to perform daily, weekly, and quarterly inspections and maintenance as described in Condition No. 5. The baghouse inspections and maintenance shall be performed by trained personnel. A minimum of ten (10) extra bags shall be kept on hand at all times. The permittee shall maintain a log of all baghouse inspections, including notations of any excursions, and a summary of any corrective action taken. Such a log shall include the date; time and initials of the person performing the inspection; and the date, time and initials of the person performing any corrective measures.

c. Visible Emissions -

Each baghouse shall be inspected for visible emissions pursuant to Condition No. 5 of this permit attachment. An excursion shall be defined as any occurrence of visible emissions as described in Condition No. 5. The visible emissions evaluations shall be performed by trained personnel. The permittee shall maintain a log of all visible emissions observations, including notations of any excursions, and a summary of any corrective action taken. Such a log shall include the date;

time and initials of the person performing the inspection; and the date, time and initials of the person performing any corrective measures.

d. Baghouse Pressure Drop -

The pressure drop across each baghouse shall be recorded on a daily basis pursuant to Condition No. 5.a.1 of this permit attachment. **Pressure drop readings of less than 3.0 inches water column and greater than 7.0 inches water column shall be defined as a CAM excursion.**

Inspections of the baghouse pressure drop shall be performed by trained personnel. The permittee shall maintain a log of the daily pressure drop observations, including notations of any excursions, and a summary of any corrective action taken. Such a log shall include the date; time and initials of the person performing the inspection; and the date, time and initials of the person performing any corrective measures.

e. Baghouse Temperature -

The flue gas temperature at the inlet of each baghouse shall be recorded on a daily basis. **A baghouse inlet temperature exceeding 500 degrees Fahrenheit shall be defined as a CAM excursion.**

Inspections of the baghouse temperature sensors shall be performed by trained personnel. The permittee shall maintain a log of the daily baghouse temperature recordings, including notations of any excursions, and a summary of any corrective action taken. Such a log shall include the date; time and initials of the person performing the inspection; and the date, time and initials of the person performing any corrective measures.

As required by other terms and conditions of this permit, all of the above monitoring equipment shall be installed, calibrated, and operating upon reissuance of this permit. The monitoring equipment shall be in operation at all times that the kilns and baghouses are in operation.

Upon detecting an excursion or exceedance, the permittee shall restore operation of the kiln and baghouse to its normal or usual manner of operation as expeditiously as practicable in accordance with good air pollution control practices for minimizing emissions. The response shall include minimizing the period of any startup, shutdown or malfunction and taking any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of the excursion or exceedance.

The permittee shall comply with all applicable reporting and recordkeeping requirements of 40 CFR Part 64.9. This includes a requirement that the permittee submit a semiannual written report to the District Compliance Division that includes the number and duration of excursions, the type of excursion (a. through e. above), the cause of the excursion (including unknown if applicable), and the corrective action taken.

If two consecutive semiannual reports indicate an accumulation of exceedances or excursions exceeding five (5) percent duration of the kiln and baghouse operating time, the permittee shall develop and implement a Quality Improvement Plan (QIP) pursuant to 40 CFR Part 64.8. (40 CFR Part 64)

9. The permittee shall provide a report to the District Compliance Division, on a monthly basis and upon request, containing the following information:
 - a. The amount of clay processed daily in the kilns. (People of the State of California v. Pacific Custom Materials, Inc. et al. Ventura County Superior Court Case No. 213707 January 12, 2004 Settlement Agreement, Section D.1.b.vi)
 - b. Data from the bag leak detection system indicating each instance of suspected bag failure and corrective action taken, if any. (People of the State of California v. Pacific Custom Materials, Inc. et al. Ventura County Superior Court Case No. 213707 January 12, 2004 Settlement Agreement, Section D.1.b.ii)
 - c. Data indicating continuous recordings of the temperature in each baghouse. (People of the State of California v. Pacific Custom Materials, Inc. et al. Ventura County Superior Court Case No. 213707 January 12, 2004 Settlement Agreement, Section D.1.b.iii)

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**Ventura County Air Pollution Control District
Permit Specific Conditions
Standby Material Handling Equipment**

Rule 26, “New Source Review”

Conditions applied pursuant to Rule 26 are federally enforceable.

Applicability:

This attachment applies to the standby raw material feed system, the primary raw material feed system, and the equipment noted on Table Nos. 2, 3, and 4 as “Out of Service”. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. The standby raw material feed system shall not be operated simultaneously with the primary raw material feed system. The standby feed system consists of the Standby Raw Material Receiving Hopper (E38) and the Raw Material Inside Feed Belt Conveyor (No. 15). The primary feed system consists of the Grizzly Raw Material Receiving Hopper (E37) with two (2) Syntron Vibrating Belt Conveyor (E1 – East and E2 - West).
2. The permittee shall maintain written records that document the use of the standby and primary raw material feed systems. Such records shall be maintained at the facility and submitted to the District upon request. On an annual basis, the permittee shall certify that the equipment has not operated simultaneously.
3. All equipment that is marked “Out of Service” on Table Nos. 2, 3, and 4 shall not be operated. The permittee shall apply for, and obtain, an Authority to Construct prior to putting this equipment into operation. This application shall be subject to Rule 26, “New Source Review”. Once constructed and/or prepared for operation in accordance with the Authority to Construct, the permittee shall submit an application to modify the Part 70 permit.

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**Ventura County Air Pollution Control District
Permit Specific Conditions
Extruder Diesel Fuel Additive Requirements**

Rule 26, “New Source Review”

Conditions applied pursuant to Rule 26 are federally enforceable.

**People of the State of California vs. Pacific Custom Materials, Inc. et al. Ventura County Superior Court Case No. 213707 January 12, 2004 Settlement Agreement
District Enforceable Only**

Applicability:

This attachment applies to the extrusion process that consists of one (1) Extruder Hopper (E8), Extruder No. 1 (E9), and Extruder No. 2 (E10) at this stationary source. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. The permittee is authorized to use diesel fuel as an additive in the extrusion process.

Only Biodiesel (B100) and Diesel Fuel No. 2, or any combination thereof, are authorized for use as an additive.

This permit does not authorize the addition of any material designated as hazardous waste or the addition of soils contaminated with petroleum based materials such as gasoline, diesel fuel, jet fuel, or lubricating oils, into the extrusion process or into the kilns.

Total facility SOx emissions are the sum of SOx emissions from the combustion of fuel in the kilns and SOx emissions from the production process. The production process SOx result from sulfur in the raw material and from the addition of diesel fuel in the extruders. (Rule 26)

2. As stated in Section No. 3 of this permit, “Permitted Throughput and Consumption Limit Table”, the volume of diesel fuel, including both Biodiesel and Diesel Fuel No. 2, used as an additive as part of the extrusion process shall not exceed 150,000 gallons per year. (Rule 26)
3. In order to comply with Condition No. 2 above, permittee shall maintain the following records:

- a. Amount, date, and supplier of diesel fuel deliveries (Biodiesel and Diesel Fuel No. 2) received at the stationary source;
- b. Monthly records of the quantity (gallons) of Biodiesel used as an additive in the extrusion process;
- c. Monthly records of the quantity (gallons) of Diesel Fuel No. 2 used as an additive in the extrusion process;

The monthly records shall be combined for Biodiesel and Diesel Fuel No. 2 and shall be summed for the previous 12 calendar months. Diesel fuel usage totals for any of these 12 calendar month rolling periods in excess of the above limit shall be considered a violation of Condition No. 2. These records shall be kept onsite at the facility and made available to the District upon request. (Rule 26)

4. The permittee shall provide a monthly report to the District Compliance Division that contains the amount, date, and supplier of diesel fuel deliveries (Biodiesel and Diesel Fuel No. 2) received at the stationary source.

(People of the State of California v. Pacific Custom Materials, Inc. et al. Ventura County Superior Court Case No. 213707 January 12, 2004 Settlement Agreement, Section D.1.b.iv)

5. The sulfur content of Biodiesel or Diesel Fuel No. 2 used as an additive in the extrusion process shall not exceed 15 parts per million, by weight, as determined by ASTM Methods D4294-98 or D2622-98. For each diesel fuel delivery, the permittee shall either obtain the supplier's certification, or shall test the sulfur content of the fuel using ASTM Method D4294-98 or D2622-98 to ensure that compliance with this condition is being maintained. Data indicating the emissions characteristics of the fuel, and the sulfur content by weight shall be maintained at the facility and shall be provided with the annual compliance certification. (Rule 26)
6. Any Biodiesel used as an additive in the extrusion process shall meet the requirements of ASTM (American Society for Testing and Materials) D-6751, "Standard Specification for Biodiesel Fuel (B100) Blend Stock for Distillate Fuels". For each Biodiesel delivery, the permittee shall obtain the supplier's certification to ensure that compliance with this condition is being maintained. Data indicating that the Biodiesel meets this standard shall be maintained at the facility and shall be provided with the annual compliance certification. (Rule 26)

**Ventura County Air Pollution Control District
Permit Specific Conditions
Material Handling Requirements**

Rule 26, "New Source Review"

Conditions applied pursuant to Rule 26 are federally enforceable.

Applicability:

This attachment applies to the material handling operations at this stationary source. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. The K3 and K4 Martin Finished Product Screw Conveyors (E36 and E37) and the K3 and K4 Martin Finished Product Bucket Elevators (E38 and E39) shall be enclosed.
2. The moisture content of all material processed at the plant (raw material and finished product sections) shall be maintained at greater than or equal to 3% by weight. (Authority to Construct No. 00036-240)
3. In order to comply with Condition No. 2 above, the permittee shall determine, no less than once every 3 months, the moisture content at the following locations:
 - a. Finished product at Kiln No. 3 (Conveyor No. 25)
 - b. Finished product at Kiln No. 4 (Conveyor No. 26)
 - c. Entrance to the Raw Material Disintegrator (E5) / Disintegrator Feed Belt (No. 4)
 - d. Raw Material Hopper Feed Belt (No. 16)
 - e. Raw Material Pug Mill Feed Belt (No. 17)

The most recent version of ASTM Test Method C 566 shall be used. The samples shall be obtained during normal plant operation and shall be obtained, transported, and analyzed in a manner consistent with current ASTM practices. The moisture content results shall be dated and maintained at the facility and shall be submitted to the District with the annual compliance certification.

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**Ventura County Air Pollution Control District
Permit Specific Conditions
Water Spray and Fugitive Emission Requirements**

Rule 50, "Opacity"

Adopted 04/13/04, Federally-Enforceable

40 CFR Part 60, "Standards of Performance for New Stationary Sources"

40 CFR Part 60, Subpart A, "General Provisions"

40 CFR Part 60, Subpart OOO, "Standards of Performance for Nonmetallic Mineral Processing Facilities"

Federally-Enforceable

Applicability:

This attachment applies to the fugitive emissions from process transfer points in both the raw material and finished material sections. This also includes each crusher, grinding mill, screening operation, bucket elevator, belt conveyor, bagging operation, storage bin, enclosed truck or railcar loading station which has been identified in this permit (Table No. 2 and Attachment CFROOO) as being subject to 40 CFR Part 60, Subpart OOO, "Standards of Performance for Nonmetallic Mineral Processing Facilities".

Conditions:

1. Pursuant to Rule 50, permittee shall not discharge into the atmosphere any air contaminants for a period or periods aggregating more than three (3) minutes in any one (1) hour which are as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines, or equivalent to 20% opacity and greater, unless specifically exempted by Rule 50.
2. The fugitive emissions from equipment identified in this permit as subject to 40 CFR Part 60, Subpart OOO, "Standards of Performance for Nonmetallic Mineral Processing Facilities", shall comply with the opacity limits of that standard. The requirements of 40 CFR Part 60, Subpart OOO are detailed in Section No. 6 of this permit.
3. In order to comply with the conditions above, permittee shall maintain the moisture content of the raw material and finished material as necessary to ensure compliance with Rule 50 and 40 CFR Part 60, Subpart OOO. The moisture content shall be maintained by adding water and/or using water spray bars as necessary. Specifically, the following equipment shall be equipped with water spray apparatus:
 - Custom-Made Aggregate Cooler No. 3 (E15)
 - Custom-Made Aggregate Cooler No. 4 (E16)

- Finished Product Belt Conveyor No. 54 - at discharge points of bucket elevators and discharge on to Conveyor No. 55
 - Finished Product Belt Conveyor No. 55 – at the discharge of Conveyor No. 54 and in the middle of the conveyor belt
4. Every two weeks, the permittee shall inspect all water spray equipment to ensure that it is operating properly. Any necessary repairs shall be made within 48 hours. A record shall be kept of these equipment inspections. These records shall include the date, time, identity of the water spray bar, an acknowledgement of proper operation, a description of any malfunction, and a description of any necessary repair. These records shall be maintained at the facility and submitted to the District with the annual compliance certification.
5. On a quarterly basis, permittee shall verify that all transfer points at the facility are complying with Rule 50 and 40 CFR Part 60, Subpart OOO. These compliance verifications shall be submitted with the annual compliance certification and shall include a formal survey identifying the date, time, transfer point, and verification that there are no visible emissions other than uncombined water greater than zero percent for a period or periods aggregating more than three (3) minutes in any one (1) hour. If visible emissions are present and the visible emissions problem cannot be corrected within 24 hours, permittee shall provide verbal notification to the District within the subsequent 24 hours.

As an alternative for transfer points subject only to Rule 50 and not subject to 40 CFR Part 60, Subpart OOO, the quarterly compliance verification shall include a formal survey identifying the date, time, transfer point, and verification that there are no visible emissions for a period or periods aggregating more than three (3) minutes in any one (1) hour which are as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines, or equivalent to 20% opacity and greater, as determined by a person certified in reading smoke using EPA Method 9 or any other appropriate test method as approved in writing by the District, the California Air Resources Board, and the U.S. Environmental Protection Agency.

As an alternative for transfer points subject to 40 CFR Part 60, Subpart OOO, the quarterly compliance verification shall include a formal survey identifying the date, time, transfer point, and verification that there are no visible emissions exceeding the applicable opacity standards of 40 CFR Part 60, Subpart OOO (7%, 10%, or 15% as applicable) as determined by a person certified in using EPA Method 9 as modified in 40 CFR Part 60, Subpart OOO. (60.675)

6. Upon District request, opacity shall be determined during visual inspections and during the quarterly compliance verification by a person certified in reading smoke using EPA Method 9 or a certified, calibrated monitoring system.

**Ventura County Air Pollution Control District
Permit Specific Conditions
Particulate Matter Emission Requirements
Finished End Baghouse**

Rule 26, "New Source Review"

Conditions applied pursuant to Rule 26 are federally enforceable.

Rule 50, "Opacity"

Adopted 04/13/04, Federally-Enforceable

Rule 52, "Particulate Matter - Concentration (Grain Loading)"

Adopted 04/13/04, Federally-Enforceable

Rule 53, "Particulate Matter - Process Weight"

Adopted 04/13/04, Federally-Enforceable

Applicability:

This attachment applies to the Finished End Baghouse associated with the finished product section at this stationary source. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. The Finished End Baghouse shall be properly installed, maintained and operated to control particulate matter emissions from the following equipment (Rule 26):
 - a. Tyler-Niagra Chute (E20)
 - b. Finished Product Vertical Impact Crusher (E30)
 - c. Yogi Finished Product Screen (E21) , located in covered shed
 - d. Whisper Vibe Single Deck Screen (E22) , located in covered shed
 - e. Whisper Vibe Single Deck Screen (E23) , located in covered shed
 - f. Symons No. 3 Screen (E34) , located in covered shed
 - g. K3 Bucket Elevator (E38)
 - h. K4 Bucket Elevator (E39)
 - i. Conveyor Nos. 54 and 55

2. Permittee shall not discharge into the atmosphere, from the exhaust stack of the Finished End Baghouse, particulate matter in excess of the following limits:

- a. Pursuant to Rule 52, a particulate matter concentration (grains per cubic foot of dry gas at standard conditions) in the stack exhaust as listed in the table shown in Rule 52 (Rule 52 Table).
- b. Pursuant to Rule 53, a solid particulate matter discharge rate (pounds per hour) as listed in the table shown in Rule 53 (Rule 53 Table).

As defined in Rule 52 and Rule 53, particulate matter is any material, except uncombined water, that exists in a finely divided form as a liquid or solid at standard conditions. For the purposes of Rule 53, solid particulate matter exists as a solid at standard conditions and includes lead and lead compounds.

In order to comply with these emission limits, the permittee shall perform a CARB Method 5 particulate matter source test at the Finished End Baghouse once every 12 months. The testing shall take place between May 1st and October 31st. The total particulate catch shall include the filter catch, probe catch, impinger catch, and the solvent extract, as specified in CARB Method 5. The average of three source test runs shall be used to determine compliance. The tests shall be conducted at normal operating load. Prior to conducting an emissions test, permittee shall notify the APCD Compliance Division. Written notification, and a source test protocol subject to District approval, shall be submitted no less than 30 calendar days prior to the test. The emissions test report shall indicate the following: emissions of particulate matter in grains per standard cubic foot of dry gas, grams per standard cubic meter, and in pounds per hour. The test report shall be submitted to the APCD Compliance Division within 45 days after the test. (Rules 52 and 53)

3. The permittee shall ensure that the Finished End Baghouse is equipped and operated with baghouse dust collectors that are in proper working condition at all times that the equipment listed above in Condition No. 1 is in operation. Dust collected from the baghouses shall be handled by an enclosed screw conveyor collection system in such a manner as to minimize fugitive emissions and entrainment to the atmosphere. (Rule 26)
4. The permittee shall not discharge into the atmosphere any air contaminants for a period or periods aggregating more than three (3) minutes in any one (1) hour which are as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines, or equivalent to 20% opacity and greater, unless specifically exempted by Rule 50. (Rule 50)
5. Permittee shall observe the following baghouse inspection schedule:
 - a. On a daily basis:

1. Note and record the pressure drop across the baghouse. Readings which are less than 1" water column (wc) or greater than 7" wc shall be investigated and corrective action shall be taken within 24 hours.
2. Perform an inspection to check the exhaust outlet, access doors, and screw conveyors for visible emissions. A record shall be kept of any occurrence of visible emissions other than uncombined water greater than zero percent for a period or periods aggregating more than three (3) minutes in any one (1) hour. These records shall include the date and time. If a visible emissions problem cannot be corrected within 24 hours, permittee shall provide verbal notification to the District within the subsequent 24 hours. These visible emissions records shall be maintained at the facility and submitted to the District upon request.

As an alternative, the permittee shall verify that there are no visible emissions for a period or periods aggregating more than three (3) minutes in any one (1) hour which are as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines, or equivalent to 20% opacity and greater, as determined by a person certified in reading smoke using EPA Method 9.

3. Observe the compressed air system for air leakage and proper operation of the pulse operation.
 4. Check the screw conveyor outlet to ensure that dust is being removed from the system.
- b. On a weekly basis:
1. Check cleaning sequence and cycle times for proper valve and timer operation.
 2. Check compressed air lines.
 3. Inspect inlet ducts to the baghouse for visible emissions. A record shall be kept of any occurrence of visible emissions other than uncombined water greater than zero percent for a period or periods aggregating more than three (3) minutes in any one (1) hour. These records shall include the date and time. If a visible emissions problem cannot be corrected within 24 hours, permittee shall provide verbal notification to the District within the subsequent 24 hours. These visible emissions records shall be maintained at the facility and submitted to the District upon request.

- c. At least four (4) times per calendar year, with at least sixty (60) days between inspections, the kilns shall be shut down and:
 1. The filter elements shall be checked for holes and the housing shall be inspected for holes and proper sealing.
 2. Inspect the screw conveyor system for any signs of damage or improper operation.

Corrective action shall be taken within 24 hours after detecting any deficiencies noted above. (Rule 26)

6. In order to comply with Condition No. 5 above, permittee shall record the periodic inspection and maintenance activities in a log. Such a log shall include:
 - a. The date; time and initials of the person performing the inspection;
 - b. The date, time and initials of the person performing any corrective measures. Include a description of any corrective measures.
 - c. Record the date and time of pulse jet baghouse cleanings.

Such log shall be maintained at the facility and shall be made available to the District upon request. (Rule 26)

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**Ventura County Air Pollution Control District
Permit Specific Conditions
Sulfur Oxides (SO_x) Emission Requirements
Kiln No. 3 and Kiln No. 4**

Rule 26, "New Source Review"

Conditions applied pursuant to Rule 26 are federally enforceable.

Rule 54, "Sulfur Compounds"

Adopted 01/14/14, Federally-Enforceable

Rule 103, "Continuous Monitoring Systems"

Adopted 02/09/99, Federally-Enforceable

**People of the State of California vs. Pacific Custom Materials, Inc. et al. Ventura County Superior Court Case No. 213707 January 12, 2004 Settlement Agreement
District Enforceable Only**

Applicability:

This attachment applies to Kiln No. 3 and Kiln No. 4 at this stationary source. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. Pursuant to Rule 54, "Sulfur Compounds", Section B.1.a, the emissions of sulfur compounds calculated as sulfur dioxide (SO₂) by volume at the point of discharge of the baghouse exhaust for each kiln shall not exceed 300 ppm by volume, corrected to 15% oxygen.

In order to demonstrate compliance with this condition, the permittee shall operate a lime injection system as required by Condition No. 4, operate continuous emission monitors as required by Condition No. 6, and maintain records of the emissions of sulfur oxides as required by Condition No. 8. (Rule 54)

2. Pursuant to Rule 54, "Sulfur Compounds", Section B.2, sulfur dioxide ground level concentrations at or beyond the property line shall not exceed 0.25 ppmv averaged over any one hour period and 0.04 ppmv averaged over any 24 hour period. In addition, pursuant to Rule 54.B.2.a, no person shall discharge sulfur compounds, which would exist as a liquid or gas at standard conditions, as sulfur dioxide which results in ground or sea level concentrations at any point at or beyond the property line such that the 1-hour average design value exceeds 0.075 ppm (Vol).

In order to demonstrate compliance with this condition, the following SO_x mass emission limits, calculated as pounds of SO₂ per hour, shall not be exceeded:

Kiln No. 3: 7.61 lb SO₂ / hr
Kiln No. 4: 8.28 lb SO₂ / hr

Compliance with these hourly mass emission limits shall be monitored by the continuous emissions monitors required by Condition No. 6. These pounds per hour limitations are based on the emission rates and air dispersion modeling submitted with Authority to Construct Application No. 00036-180. Upon request of the APCD, additional air dispersion modeling shall be conducted to demonstrate compliance with these concentration limits. (Rule 54)

3. As stated in Section No. 3 of this permit, "Permitted Throughput and Consumption Limit Table", the combined emissions of sulfur oxides (SO_x) from Kiln No. 3 and Kiln No. 4 shall not exceed 63.55 tons per year, calculated as sulfur dioxide (SO₂), during any twelve calendar month rolling period.

In order to demonstrate compliance with this condition, the permittee shall operate continuous emission monitors as required by Condition No. 6 and maintain records of the emissions of sulfur oxides as required by Condition No. 8. (Rule 26)

4. Kiln No. 3 and Kiln No. 4 shall each be equipped with a lime injection system for the control of sulfur oxides (SO_x) emissions. The lime injection systems shall be operated in proper working condition at all times that the kilns are in operation.

In order to demonstrate compliance with this condition, the permittee shall maintain hourly records of the lime injection frequency readings (Hz) and the calculated lime injection rate in units of pounds of lime per hour, for each kiln. (Rule 54)

5. The permittee shall provide monthly reports to the District Compliance Division of the amount and date of lime deliveries received at the stationary source. The reports shall include the supplier of the lime. (People of the State of California v. Pacific Custom Materials, Inc. et al. Ventura County Superior Court Case No. 213707 January 12, 2004 Settlement Agreement, Section D.1.b.v)
6. Pursuant to Rule 103, "Continuous Monitoring Systems", Section A.4, the permittee shall operate a CEM (Continuous Emission Monitoring) system for measurement of SO_x emissions from each kiln. The CEM shall measure the concentration (by volume) and the emission rate (in pounds per hour) of SO_x as measured as sulfur dioxide (SO₂).

The CEM shall be installed, calibrated, operated, and maintained pursuant to 40 CFR Part 51, Appendix P, Sections 3.0 through 3.9.5. This includes 40 CFR, Part 60, Appendix B,

Performance Specification 2, "Specifications and Test Procedures for SO₂ and NO_x Continuous Emission Monitoring Systems in Stationary Sources" and Performance Specification 6, "Specifications and Test Procedures for Continuous Emission Rate Monitoring Systems in Stationary Sources". The CEM shall measure sulfur oxides concentration and calculate the mass emission rate. The CEM system shall be used to demonstrate compliance with the 300 ppmv limit (Rule 54.B.1.a) of Condition No. 1, the pounds per hour emission limits of Condition No. 2, and the 63.55 tons per year emission limit of Condition No. 3.

The CEM shall be designed to complete one cycle of operation (sampling, analyzing, and data recording) every 15 minutes. The concentration and emission rate shall each be recorded as a one (1) hour average. A valid hourly average shall have at least two data points. (Rule 103)

7. The permittee shall provide to the District Compliance Division real time access by modem to all CEM systems measuring SO_x emissions from stacks attached to Kiln No. 3 and Kiln No. 4. (People of the State of California v. Pacific Custom Materials, Inc. et al. Ventura County Superior Court Case No. 213707 January 12, 2004 Settlement Agreement, Section D.1.b.i)
8. Pursuant to Rule 103.B.2, the permittee shall maintain permanent continuous monitoring records. The records shall be in a form suitable for inspection, shall be made available to the District upon request, and shall include:
 - a. The date, time and duration of any startup, shutdown or malfunction in the operation of any affected facility.
 - b. The results of performance testing, evaluations, calibrations, checks, adjustments, and maintenance of any continuous emission monitors that have been installed pursuant to Rule 103.
 - c. Hourly average SO_x concentration in ppmv, at each kiln, as measured by the CEM system.
 - d. Hourly average pounds per hour SO_x emissions at each kiln, as measured by the CEM system.
 - e. Tons per year SO_x emissions on a 12 calendar month rolling period basis at each kiln and both kilns combined, as measured by the CEM system.
 - f. Hourly records of the lime injection frequency readings (Hz) and the calculated lime injection rate in units of pounds of lime per hour, for each kiln.
9. Pursuant to Rule 103.B.1, the permittee shall report any violation of any applicable monitored emission standard in writing to the District within 96 hours of each occurrence. Upon receipt, the District shall transmit the violation report to the state within five working days.

10. Pursuant to Rule 103.B.5(c), continuous emission monitoring data shall be reduced according to the procedure established in 40 CFR, Part 51, Appendix P, paragraphs 5.0 through 5.3.3, or by other methods determined to be equivalent by the District, the Air Resources Board, and the Environmental Protection Agency.
11. Relative Accuracy testing shall be conducted for the sulfur oxides continuous emission monitoring system once every 12 months. The testing shall take place between May 1st and October 31st. This test shall be conducted by an independent contractor. The testing shall be conducted pursuant to 40 CFR, Part 60, Appendix B, Performance Specification 2, "Specifications and Test Procedures for SO₂ and NO_x Continuous Emission Monitoring Systems in Stationary Sources" and Performance Specification 6, "Specifications and Test Procedures for Continuous Emission Rate Monitoring Systems in Stationary Sources". The testing shall be conducted at the expected maximum operating load of each kiln. Pursuant to Rule 54.D.1, the following test methods shall be used for the reference method testing: EPA Methods 6, 6A, 6C, or 8 as appropriate.

Prior to testing, a source test protocol shall be submitted to, and approved by, the District. The District shall be notified at least seven days prior to the emissions test and the test schedule shall be re-confirmed one working day in advance of the planned test. District personnel shall be allowed to observe the test.

A report of the test results shall be submitted to the District within 45 days after the completion of the tests. The test report shall indicate, for each kiln, the emissions of SO_x in parts per million by volume and pounds per hour; the amount of excess oxygen in percent by volume; the fuel and exhaust flow rates in standard cubic feet per minute; the lime injection rate; the product feed rate; the relative accuracy of the continuous emission monitoring system in terms of parts per million by volume SO_x, pounds per hour SO_x, and exhaust flow rate. (Rule 54)

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**Ventura County Air Pollution Control District
Permit Specific Conditions
Particulate Matter Emission Requirements
Raw Material Baghouse**

Rule 26, "New Source Review"

Conditions applied pursuant to Rule 26 are federally enforceable.

Rule 50, "Opacity"

Adopted 04/13/04, Federally-Enforceable

Rule 52, "Particulate Matter - Concentration (Grain Loading)"

Adopted 04/13/04, Federally-Enforceable

Rule 53, "Particulate Matter - Process Weight"

Adopted 04/13/04, Federally-Enforceable

Applicability:

This attachment applies to the Raw Material Baghouse (Industrial Clean Air, Inc., Model #41-71S, E29) at this stationary source. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. The Raw Material Baghouse (Industrial Clean Air, Inc., Model #41-71S, E29) shall be properly installed, maintained and operated to control particulate matter emissions from the following equipment (Rule 26):
 - a. J.C. Steele Disintegrator (Raw Material Crusher) (E5)
 - b. Symons No. 1 Raw Material Screen (E7)
 - c. Symons No. 2 Raw Material Clay Screen (E9)
 - d. Raw Material Conveyor Belt No. 4 (Disintegrator Feed Belt)
 - e. Raw Material Conveyor Belt No. 11 (Symons Screen No. 2 Discharge)
 - f. Raw Material Conveyor Belt No. 12 (Symons Screen No. 1 Discharge)
 - g. Raw Material Conveyor Belt No. 13 (Symons Screen Tail Belt)
 - h. Raw Material Conveyor Belt No. 14 (Loop Belt)
 - i. Raw Material Conveyor Belt No. 16 (Hopper Feed Belt)
 - j. Raw Material Conveyor Belt No. 17 (Pug Mill Feed Belt)
 - k. Raw Material Conveyor Belt No. 18 (Pug Mill Feeder Belt)

2. The permittee shall not discharge into the atmosphere from the exhaust stack of the Raw Material Baghouse (Industrial Clean Air, Inc., Model #41-71S, E29) particulate matter in excess of the following limits:
 - a. Pursuant to Rule 52, a particulate matter concentration (grains per cubic foot of dry gas at standard conditions) in the stack exhaust as listed in the table shown in Rule 52 (Rule 52 Table).
 - b. Pursuant to Rule 53, a solid particulate matter discharge rate (pounds per hour) as listed in the table shown in Rule 53 (Rule 53 Table).

As defined in Rule 52 and Rule 53, particulate matter is any material, except uncombined water, that exists in a finely divided form as a liquid or solid at standard conditions. For the purposes of Rule 53, solid particulate matter exists as a solid at standard conditions and includes lead and lead compounds.

In order to comply with these emission limits, the permittee shall perform a CARB Method 5 particulate matter source test at the Raw Material Baghouse (Industrial Clean Air, Inc., Model #41-71S, E29) once every 12 months. The testing shall take place between May 1st and October 31st. The total particulate catch shall include the filter catch, probe catch, impinger catch, and the solvent extract, as specified in CARB Method 5. The average of three source test runs shall be used to determine compliance. The tests shall be conducted at normal operating load. Prior to conducting an emissions test, permittee shall notify the APCD Compliance Division. Written notification, and a source test protocol subject to District approval, shall be submitted no less than 30 calendar days prior to the test. The emissions test report shall indicate the following: emissions of particulate matter in grains per standard cubic foot of dry gas, grams per standard cubic meter, and in pounds per hour. The test report shall be submitted to the APCD Compliance Division within 45 days after the test. (Rules 52 and 53)

3. The permittee shall ensure that the Raw Material Baghouse (Industrial Clean Air, Inc., Model #41-71S, E29) is equipped and operated with baghouse dust collectors that are in proper working condition at all times that the equipment listed above in Condition No. 1 is in operation. Dust collected from the baghouses shall be handled by an enclosed screw conveyor collection system in such a manner as to minimize fugitive emissions and entrainment to the atmosphere. (Rule 26)
4. The permittee shall not discharge into the atmosphere any air contaminants for a period or periods aggregating more than three (3) minutes in any one (1) hour which are as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines, or equivalent to 20% opacity and greater, unless specifically exempted by Rule 50. (Rule 50)

5. Permittee shall observe the following baghouse inspection schedule:

a. On a daily basis:

1. Note and record the pressure drop across the baghouse. Readings which are less than 1" water column (wc) or greater than 5" wc shall be investigated and corrective action shall be taken within 24 hours.
2. Perform an inspection to check the exhaust outlet, access doors, and screw conveyors for visible emissions. A record shall be kept of any occurrence of visible emissions other than uncombined water greater than zero percent for a period or periods aggregating more than three (3) minutes in any one (1) hour. These records shall include the date and time. If a visible emissions problem cannot be corrected within 24 hours, permittee shall provide verbal notification to the District within the subsequent 24 hours. These visible emissions records shall be maintained at the facility and submitted to the District upon request.

As an alternative, the permittee shall verify that there are no visible emissions for a period or periods aggregating more than three (3) minutes in any one (1) hour which are as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines, or equivalent to 20% opacity and greater, as determined by a person certified in reading smoke using EPA Method 9.

3. Observe the compressed air system for air leakage and proper operation of the pulse operation.
4. Check the screw conveyor outlet to ensure that dust is being removed from the system.

b. On a weekly basis:

1. Check cleaning sequence and cycle times for proper valve and timer operation.
2. Check compressed air lines.
3. Inspect inlet ducts to the baghouse for visible emissions. A record shall be kept of any occurrence of visible emissions other than uncombined water greater than zero percent for a period or periods aggregating more than three (3) minutes in any one (1) hour. These records shall include the date and time. If a visible emissions problem cannot be corrected within 24

hours, permittee shall provide verbal notification to the District within the subsequent 24 hours. These visible emissions records shall be maintained at the facility and submitted to the District upon request.

- c. At least four (4) times per calendar year, with at least sixty (60) days between inspections, the kilns shall be shut down and:
 - 1. The filter elements shall be checked for holes and the housing shall be inspected for holes and proper sealing.
 - 2. Inspect the screw conveyor system for any signs of damage or improper operation.

Corrective action shall be taken within 24 hours after detecting any deficiencies noted above. (Rule 26)

- 6. In order to comply with Condition No. 5 above, permittee shall record the periodic inspection and maintenance activities in a log. Such a log shall include:
 - a. The date; time and initials of the person performing the inspection;
 - b. The date, time and initials of the person performing any corrective measures. Include a description of any corrective measures.
 - c. Record the date and time of pulse jet baghouse cleanings.

Such log shall be maintained at the facility and shall be made available to the District upon request. (Rule 26)

**Ventura County Air Pollution Control District
Permit Specific Conditions
Portable Screening Plants**

Rule 26, "New Source Review"

Conditions applied pursuant to Rule 26 are federally enforceable.

40 CFR Part 60, "Standards of Performance for New Stationary Sources"

40 CFR Part 60, Subpart A, "General Provisions"

**40 CFR Part 60, Subpart OOO, "Standards of Performance for Nonmetallic Mineral Processing Facilities"
Federally-Enforceable**

Applicability:

This attachment applies to the Portable Screening Plants at this stationary source. Each plant consists of a receiving hopper, screen, and conveyors. The plants are equipped with water spray for particulate matter control. The plants may be used at various locations at the stationary source. These requirements are in addition to any other specific or general requirements referenced in this permit.

Conditions:

1. As stated in Section No. 3 of this permit, "Permitted Throughput and Consumption Limit Table", material processed at the portable screening plants shall not exceed 1,080,000 tons per year. This annual material throughput limit is for the combination of the two portable screening plants.

In order to comply with this condition, the permittee shall maintain records and monthly reports of the tons of material processed through the combination of both portable screening plants. The monthly reports shall be maintained at the facility, and shall be submitted to the District with the annual compliance certification. Material process rate totals for any twelve-month rolling period in excess of the specified limit shall be considered a violation of this condition. (Rule 26)

2. The portable screening plants shall only use electrical power purchased from a public utility. Diesel engines may only be used for the plant(s) for the purpose of moving the unit(s) within the facility. The permittee shall annually certify that the plant is only operated with electrical power purchased from a public utility. (Rule 26)
3. Water sprays, or an equivalent moisture content greater than or equal to 3% by weight, shall be used and maintained where and when necessary to control fugitive emissions from the screening plants and material storage piles. Moisture content shall be

determined every six months using the most recent version of ASTM Method C-566. The samples shall be obtained during normal plant operation and shall be obtained, transported, and analyzed in a manner consistent with current ASTM practices. At the discretion of the District Compliance Division, the frequency of the moisture content measurements can be reduced to once a year based on the usage of the plants. The moisture content results shall be dated and maintained at the facility and shall be submitted to the District with the annual compliance certification. (Rule 26)

4. Pursuant to Table 3 of 40 CFR Part 60, Subpart OOO, an initial EPA Method 9 source test is required for the Powerscreen Chieftain 2100S 3 Deck Inline Screen portable screening plant. The testing shall be conducted pursuant to 40 CFR Sections 60.11 and 60.675. A report of the test results shall be submitted to the District Compliance Division. Alternatively, an initial inspection shall be conducted by VCAPCD compliance personnel. The inspection will include an EPA Method 9 source test if visible emissions are observed. The testing shall be conducted within 60 days of plant start up or during the next District inspection occurring between September 1, 2016 and December 31, 2016.

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8. GENERAL APPLICABLE REQUIREMENTS (ATTACHMENTS)

The general applicable requirements are broadly applicable requirements that apply and are enforced in the same manner for all subject emissions units or activities. These requirements can normally be adequately addressed in the permit application with minimal or no reference to any specific emissions unit or activity, provided that the scope of the requirement and the manner of its enforcement are clear. Examples of such requirements include those that apply identically to all emissions units at a facility (e.g., source-wide opacity limits), general housekeeping requirements, and requirements that apply identical emissions limits to small units (e.g., process weight requirements).

As detailed in the Title V Permit Reissuance Application, general applicable requirements that apply to this facility were determined. The permit conditions associated with each generally applicable requirement are listed in an individual attachment. The attachment is identified with the label "Attachment (APCD Rule No.) ____" in the lower left corner of each attachment. Each attachment has an applicability section that describes the emissions units to which the attachment applies. Each attachment may apply to one or more of the emissions units listed in the Applicable Requirements Table of Section No. 2. Note that these general applicable requirements may also apply to emissions units not required to be listed in the permit, such as those that are short-term.

Ventura County Air Pollution Control District
Rule 50 Applicable Requirements
Opacity

Rule 50, "Opacity"

Adopted 04/13/04, Federally-Enforceable

Applicability:

This attachment applies to all emissions units at this stationary source. This includes, but is not limited to, all equipment listed in Table Nos. 2, 3 and 4 of this permit as well as all mining activities; truck loading, unloading, and transferring operations; paved and unpaved roads; disturbed surface areas; and all material storage piles.

This attachment does not regulate or restrict the use of motor vehicles and mobile equipment such as cars, trucks, bulldozers, and forklifts, however, any smoke or dust emissions generated from the use of such equipment is subject to District Rule 50, "Opacity", and the "Fugitive Dust Reduction Plan" required below.

Conditions:

1. Pursuant to Rule 50.A, permittee shall not discharge into the atmosphere from any single source whatsoever any air contaminants for a period or periods aggregating more than three (3) minutes in any one (1) hour which are as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines, or equivalent to 20% opacity and greater, unless specifically exempted by Rule 50.
2. During the surveillance of plant operations, permittee shall perform periodic surveys and visual inspections to ensure that compliance with Rule 50 is being maintained. A record shall be kept of any occurrence of visible emissions other than uncombined water greater than zero percent for a period or periods aggregating more than three (3) minutes in any one (1) hour. These records shall include the date, time, and identity of emissions unit. If the visible emissions problem cannot be corrected within 24 hours, permittee shall provide verbal notification to the District within the subsequent 24 hours. These visible emissions records shall be maintained at the facility and submitted to the District upon request.
3. On a quarterly basis, permittee shall verify that all emissions units at the facility are complying with Rule 50. These compliance verifications shall be submitted with the annual compliance certification and shall include a formal survey identifying the date, time, emissions unit, and verification that there are no visible emissions other than uncombined water greater than zero percent for a period or periods aggregating more than three (3) minutes in any one (1) hour. As an alternative, the quarterly visible

emission compliance verifications shall include a formal survey identifying the date, time, emissions unit, and verification that there are no visible emissions for a period or periods aggregating more than three (3) minutes in any one (1) hour which are as dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines, or equivalent to 20% opacity and greater, as determined by a person certified in reading smoke using EPA Method 9, or any other appropriate test method as approved in writing by the District, the California Air Resources Board, and the U.S. Environmental Protection Agency. Upon District request, opacity shall be determined during the quarterly compliance verifications by a person certified in reading smoke using EPA Method 9 or a certified, calibrated monitoring system.

4. On and after July 1, 2006, the permittee shall maintain and implement a District approved "Fugitive Dust Reduction Plan" to maintain compliance with Rule 50.

This "Fugitive Dust Reduction Plan" shall include, but not be limited to, the following examples of equipment and/or strategies to minimize fugitive dust at all locations within the property lines of the facility:

- a. The use of dust suppressants such as water, hygroscopic materials, or chemical stabilizers on disturbed surface areas; unpaved roads; vehicle parking and staging areas; material storage piles; truck loading, unloading, and transferring operations; and material transfer points at conveyors, screens, and crushers.
- b. The use of paved areas, rumble grates or gravel pads to minimize track out material that adheres to and agglomerates on the exterior surface of motor vehicles, haul trucks, and equipment prior to its release onto paved public roads.
- c. The use of posted speed limits on unpaved haul roads.

The "Fugitive Dust Reduction Plan" is subject to District approval and shall include monitoring, recordkeeping and reporting requirements to verify that it is being implemented. The records and reports shall be maintained at the facility and shall be made available to the District upon request.

A failure to implement any portion of the "Fugitive Dust Reduction Plan" shall be considered a violation of this condition regardless of whether a violation of Rule 50, "Opacity", can or cannot be verified.

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Ventura County Air Pollution Control District
Rule 54 Applicable Requirements
Sulfur Compounds - Sulfur Emissions from
Combustion Operations at Point of Discharge

Rule 54, "Sulfur Compounds"

Adopted 01/14/14, Federally-Enforceable

Rule 64, "Sulfur Content of Fuels"

Adopted 04/13/99, Federally-Enforceable

Applicability:

This attachment applies to all combustion emissions units at this stationary source, excluding Kiln No. 3 and Kiln No. 4, that combust gaseous or liquid fuels. Rule 54 requirements for Kiln No. 3 and Kiln No. 4 are included in Permit Attachment PO00036PC9.

This attachment addresses the requirements of Rule 54 for sulfur emissions at the point of discharge. It can be demonstrated that compliance with the fuel sulfur content limits of Rule 64 ensures compliance with the sulfur emission limits of Rule 54.

Conditions:

1. Pursuant to Rule 54.B.1.a, no person shall discharge sulfur compounds, which would exist as a liquid or gas at standard conditions, in excess of 300 ppm by volume from any combustion operation, calculated as sulfur dioxide (SO₂) by volume at the point of discharge. The SO₂ concentration shall be corrected to 3% oxygen or 15% oxygen (as applicable) pursuant to Rule 54.B.1.a.
2. In order to comply with Rule 54, permittee shall comply with the fuel sulfur content limits of Rule 64. No additional periodic monitoring requirements for Rule 54 are required beyond the periodic monitoring requirements of Rule 64.
3. Upon District request, sulfur compounds at the point of discharge shall be determined by source testing using EPA Test Method 6, 6A, 6C, 8, 15, 16A, 16B, or South Coast AQMD Test Method 307-94 (Determination of Sulfur in a Gaseous Matrix), as appropriate.

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Ventura County Air Pollution Control District
Rule 54 Applicable Requirements
Sulfur Compounds - Sulfur Dioxide Concentration at Ground Level

Rule 54, "Sulfur Compounds"
Adopted 01/14/14, Federally-Enforceable

Applicability:

This attachment applies to all combustion emissions units at this stationary source, excluding Kiln No. 3 and Kiln No. 4, that emit sulfur compounds. Rule 54 requirements for Kiln No. 3 and Kiln No. 4 are included in Permit Attachment PO00036PC9.

This attachment addresses the requirements of Rule 54 for sulfur emissions at ground or sea level at or beyond the property line of the stationary source.

Conditions:

1. Pursuant to Rule 54.B.2, no person shall discharge sulfur compounds, which would exist as a liquid or gas at standard conditions, as sulfur dioxide which results in average ground or sea level concentrations at any point at or beyond the property line in excess of 0.25 ppmv averaged over any one hour period, or 0.04 ppmv averaged over any 24 hour period.
2. Pursuant to Rule 54.B.2.a, no person shall discharge sulfur compounds, which would exist as a liquid or gas at standard conditions, as sulfur dioxide which results in ground or sea level concentrations at any point at or beyond the property line such that the 1-hour average design value exceeds 0.075 ppm (Vol).
 - a) For purposes of Subsection B.2.a, the design value is derived from the 3-year average of annual 99th percentile daily maximum 1-hour values. At the District's discretion, compliance with the ground or sea level concentration limit in Subsection B.2.a of this rule may be demonstrated using EPA-approved dispersion models or ambient air monitoring. If the District requires ambient air monitoring, the test method(s) listed in Subsection D.2 of this rule must be employed.
 - b) To demonstrate compliance using dispersion modeling, the annual 99th percentile daily maximum at each receptor is determined from model results as follows: for each year of meteorological data modeled, select from each day the maximum hourly modeled SO₂ concentration value and sort all these daily maximum hourly values by descending value. The 99th percentile is the 4th highest value for each modeled year. Calculate the average of the 99th percentile values for three consecutive years of modeling data for each receptor. Compliance is

demonstrated if this average value is less than or equal to the design value concentration limit in Subsection B.2.a of Rule 54 at each receptor.

- c) Compliance with the limit in subsection B.2.a may also be demonstrated using EPA-approved screen models. Compliance is demonstrated if the 1-hour SO₂ ground or sea level concentration does not exceed 0.075 ppm (Vol) at or beyond the property line.
 - d) If ambient air monitoring data is used to demonstrate compliance, the design value must be calculated in accordance with 40 CFR Part 50 Appendix T – Interpretation of the Primary National Ambient Air Quality Standards for Oxides of Sulfur (Sulfur Dioxide).
3. Permittee shall maintain a representative fuel analysis or exhaust analysis, along with modeling data or other demonstration to ensure that compliance with Rule 54 is being maintained. This analysis and compliance demonstration shall be provided to the District upon request.
4. Upon District request, ground or sea level concentrations of SO₂ shall be determined by Bay Area Air Quality Management District Manual of Procedures, Volume VI, Section 1, Ground Level Monitoring for Hydrogen Sulfide and Sulfur Dioxide (July 20, 1994) with the following amendments:
- a. The wind direction shall be continuously measured and recorded to within 5 degrees of arc, and wind speed shall be continuously measured and recorded to within 0.25 miles per hour (mph) at wind speeds less than 25 mph and with a threshold no greater than 0.2 mph.
 - b. The meteorological instruments and siting requirements shall comply with the guidelines in "Quality Assurance Handbook for Air Pollution Measurements Systems, Volume IV, Meteorological Measurements Version 2.0," EPA-454/B-08-002, March 2008.
 - c. The gas standards shall be restandardized against the reference wet chemical method at a minimum of once every 12 months, or be standardized using National Institute of Standards and Technology (NIST) standard gases.

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Ventura County Air Pollution Control District
Rule 55 Applicable Requirements
Fugitive Dust

Rule 55, "Fugitive Dust"
Adopted 06/10/08, District-Enforceable

This permit attachment will become federally enforceable when Rule 55 is approved by EPA as part of the SIP.

Applicability:

This attachment applies to any operation, disturbed surface area, or man-made condition at this stationary source that is capable of generating dust. These operations may include bulk material handling, earth-moving, construction, demolition, storage piles, unpaved roads, track-out, or off-field agricultural operations.

All definitions listed in Section H of Rule 55 are applicable to this attachment. The Rule 55 definition section includes the following definitions: "disturbed surface area", "bulk material", "earth moving activities", "construction/demolition activities", "storage piles", "paved road", "track-out", and "off-field agricultural operations". All exemptions listed in Section D of Rule 55 are applicable to this attachment.

Conditions:

1. Pursuant to Rule 55.B.1, the permittee shall not cause or allow the emissions of fugitive dust from any applicable source such that the dust remains visible beyond the midpoint (width) of a public street or road adjacent to the property line of the emission source or beyond 50 feet from the property line if there is not an adjacent public street or road.
2. Pursuant to Rule 55.B.2, the Permittee shall not cause or allow the emissions of fugitive dust from any applicable source such that the dust causes 20 percent opacity or greater during each observation and the total duration of such observations (not necessarily consecutive) is a cumulative 3 minutes or more in any one (1) hour. Only opacity readings from a single source shall be included in the cumulative total used to determine compliance. Compliance with the opacity limit shall be determined by using EPA Method 9 with the modifications listed in Section F of Rule 55.
3. Pursuant to Rule 55.B.3, the permittee shall not allow track-out to extend 25 feet or more in length unless at least one of the following three control measures is utilized: track-out area improvement, track-out prevention, or track-out removal. These control measures are detailed in Rule 55.B.3.a.

4. Pursuant to Rule 55.B.3.b, notwithstanding other track-out requirements, all track-out shall be removed at the conclusion of each workday or evening shift subject to the conditions listed in Section 55.B.3.b.
5. Pursuant to Rule 55.C, the permittee shall comply with the specific activity requirements detailed in Section C of Rule 55, for earth-moving, bulk material handling, and truck hauling activities, as applicable.
6. The permittee shall comply with the specific recordkeeping requirements listed in Section E of Rule 55, as applicable.
7. On an annual basis, the permittee shall certify that all applicable sources of dust at this stationary source are operating in compliance with Rule 55. The permittee may also certify annually that there are no operations, disturbed surface areas, or man-made conditions at this stationary source that are subject to Rule 55.

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Ventura County Air Pollution Control District
Rule 64 Applicable Requirements
Sulfur Content of Fuels - Gaseous Fuel Requirements

Rule 64, "Sulfur Content of Fuels"
Adopted 04/13/99, Federally-Enforceable

Applicability:

This attachment applies to all combustion emissions units at this stationary source while the emissions units are combusting gaseous fuels. Rule 64 shall not apply to any flare gas combustion, where no useful energy is produced and which is subject to Rule 54, "Sulfur Compounds".

Conditions:

1. Pursuant to Rule 64, no person shall burn at any time gaseous fuel containing sulfur compounds in excess of 50 grains per 100 cubic feet of gaseous fuel (788 ppmv), calculated as hydrogen sulfide at standard conditions, unless specifically exempted by Rule 64.
2. If only Public Utilities Commission-regulated natural gas, propane, or butane is combusted at this facility, it will be assumed that the permittee is complying with Rule 64 without additional periodic monitoring requirements. Any person claiming this exemption shall maintain records sufficient to substantiate the use of these fuels.
3. If other than Public Utilities Commission-regulated natural gas, propane, or butane is being combusted, the permittee shall analyze the sulfur content of the fuel on an annual basis using South Coast AQMD Method 307-94 - Determination of Sulfur in a Gaseous Matrix or by ASTM D1072-90 (1994), Standard Test Method for Total Sulfur in Fuel Gases.

Alternatively, when measuring the sulfur content of landfill or oilfield gaseous fuel, permittee may use the colorimetric method ASTM D 4810-88 (Reapproved 1994) or the ASTM D4084-94 (Lead Acetate Reaction Rate Method) and may assume that the hydrogen sulfide content of the fuel gas adequately represents the total sulfur content. However, if the sulfur content as measured by ASTM D4810-88 or ASTM D4084-94 equals or exceeds 200 ppmv, then only South Coast AQMD Method 307-94 or ASTM D1072-90 (1994) shall be used to determine compliance.

The applicable ranges of some ASTM methods mentioned above are not adequate to measure the levels of sulfur in some fuel gases. Dilution of samples before analysis may be used subject to the verification of the dilution ratio.

Permittee may use the colormetric method ASTM D 4810-88 (Reapproved 1994) for the measurement of the sulfur content of gaseous fuels other than landfill or oilfield gas only if written approval has been granted by the District and by US EPA.

4. Monitoring of the sulfur content of landfill or oilfield gaseous fuel by the permittee shall be at least quarterly if any of the following conditions apply:
 - a. Any sulfur measurement exceeds 394 ppmv, calculated as hydrogen sulfide at standard conditions.
 - b. A stationary source is new.
 - c. The permittee has not reported historical measurements of hydrogen sulfide of the landfill or oilfield gaseous fuel performed within the previous three years in writing to the District for a stationary source.

An operator may have the sulfur content of landfill or oilfield gaseous fuel monitored annually only, instead of quarterly, by satisfying the following provisions:

- a. During four consecutive calendar quarters, each sulfur content measurement shall not exceed 394 ppmv, calculated as hydrogen sulfide at standard conditions, and
- b. Submit a written request to the District for a reduction in monitoring frequency. This request shall contain backup documentation including monitoring reports that document the above provision. Requests for a reduction in monitoring frequency are not effective until written approval by the District is received by the operator.

This annual fuel analysis, and the quarterly analyses if applicable, shall be maintained at the facility and a copy of the annual analysis shall be provided to the District with the annual compliance certification.

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**Ventura County Air Pollution Control District
Rule 64 Applicable Requirements
Sulfur Content of Fuels - Liquid Fuel Requirements**

**Rule 64, "Sulfur Content of Fuels"
Adopted 04/13/99, Federally-Enforceable**

Applicability:

This attachment applies to all combustion emissions units at this stationary source while the emissions units are combusting liquid fuels. This attachment does not apply to any combustion emission unit with sulfur emission controls.

Conditions:

1. Pursuant to Rule 64, no person shall burn any liquid fuels with a sulfur content in excess of 0.5 percent, by weight, unless specifically exempted by Rule 64.
2. If only ARB-quality reformulated gasoline or ARB-certified diesel fuel is combusted at this facility, it will be assumed that the permittee is complying with Rule 64 without additional periodic monitoring requirements. Any person claiming this exemption shall maintain records sufficient to substantiate the use of these fuels.
3. If other than ARB-quality reformulated gasoline or ARB-certified diesel fuel is being combusted, for each liquid fuel delivery permittee shall either obtain the fuel supplier's certification, or shall test the sulfur content of the fuel using ASTM Method D4294-98 or D2622-98, to ensure that compliance with Rule 64 is being maintained. For liquid fuels, operators of electric power generation units may use the sampling and analysis methods prescribed in Code of Federal Regulations 40CFR Part 75 Appendix D.2.2. The fuel supplier's certification may be provided once for each purchase lot, if records are kept of the purchase lot number of each delivery.

The fuel sulfur content by weight data shall be maintained at the facility and shall be provided with the annual compliance certification.

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Ventura County Air Pollution Control District
Rule 74.6 Applicable Requirements
Surface Cleaning and Degreasing

Rule 74.6, "Surface Cleaning and Degreasing"
Adopted 11/11/03, Federally-Enforceable

Applicability:

This attachment applies to all solvent cleaning activities at this stationary source, except those activities listed in Condition No. 11 that are exempt pursuant to Section E of Rule 74.6. This attachment does not apply to substrate surface preparation regulated by other APCD surface coating, adhesive, ink, resin, and solvent rules. "Solvent" is defined as any ROC-containing liquid used to perform solvent cleaning. "Solvent cleaning" is defined as the use of organic solvent to remove loosely held uncured adhesives, uncured inks, uncured coatings, uncured resins, and other contaminants which include, but are not limited to, dirt, soil, lubricants, coolant, moisture, grease, and fingerprints, from parts, tools, machinery, equipment, and general work areas.

This attachment also contains requirements, pursuant to Rule 74.6, for cold cleaners. A cold cleaner is defined in Rule 74.6 as any batch operated equipment designed to contain liquid solvent that is operated below the solvent's boiling point to carry out solvent cleaning operations. A specific type of cold cleaner is a "remote reservoir cold cleaner" which is a device in which solvent is moved through a sink-like work area for cleaning parts and drains immediately, without forming a pool, through a single drain hole less than 100 square centimeters (15.5 square inches) in area into an enclosed container that is not accessible for soaking parts. The freeboard height for remote reservoir cold cleaners is the distance from the top of the solvent drain to the top of the tank.

This attachment does not apply to solvent cleaning where an emission control system is used pursuant to Rule 74.6.B.5 or where an alternative cleaning system is used pursuant to Rule 74.6.B.6. Pursuant to APCD Rule 23.F.7, solvents used by the permittee for facility, ground, and building maintenance and repair are exempt from the requirement to have a permit. However, unless exempted by Rule 74.6.E, such solvents are required to comply with Rule 74.6.

Conditions:

1. Pursuant to Rule 74.6.B.1, no person shall perform solvent cleaning using solvent that exceeds the following limits:
 - a. Solvents used for application equipment cleanup, and all other cleanup of uncured coatings, adhesives, inks, or resins, shall not exceed an ROC content of 900 grams per liter and an ROC composite partial pressure of 33 mmHg at 20°C, as applied.

- b. Solvents used for cleaning of electronic components, electrical apparatus components, medical devices, or aerospace components shall not exceed an ROC content of 900 grams per liter and an ROC composite partial pressure of 33 mmHg at 20°C, as applied.
 - c. Solvents used for cleaning for purposes other than those listed in (a) and (b) above shall not exceed an ROC content of 25 grams per liter, as applied.
2. Pursuant to Rule 74.6.B.2, no person shall perform solvent cleaning using a solvent with an ROC content greater than 25 grams per liter unless one of the following cleaning devices or methods is used:
 - a. Wipe cleaning where solvent is dispensed to wipe cleaning materials from containers that are kept closed to prevent evaporation, except while dispensing solvent or replenishing the solvent supply;
 - b. Non-atomized solvent flow, dip, or flush method where pooling on surfaces being cleaned is prevented or drained, and all solvent runoff is collected in a manner that enables solvent recovery or disposal. The collection system shall be kept closed to prevent evaporation except while collecting solvent runoff or emptying the collection system;

If the cleaning method has a solvent capacity more than one gallon, a cold cleaner or remote reservoir cold cleaner meeting the equipment and operating requirements of Condition Nos. 8, 9, and 10 of this attachment (Sections C and D of Rule 74.6) shall be used to comply with this requirement.
 - c. Application of solvent from a hand held spray bottle, squirt bottle or other closed container with a capacity of one liter or less;
 - d. A properly used enclosed gun washer or low emission spray gun cleaner.
3. Pursuant to Rule 74.6.B.3.a, no person shall allow liquid cleaning solvent to leak from any equipment or container.
4. Pursuant to Rule 74.6.B.3.b, no person shall specify, solicit, supply, or require any cleaning solvent or solvent cleaning equipment intended for uses governed by Rule 74.6 if such use would violate Rule 74.6. This prohibition applies to all written and oral contracts under which solvent cleaning operations subject to Rule 74.6 are to be conducted at any location in Ventura County.
5. Pursuant to Rule 74.6.B.3.c, no person shall use more than one gallon per week of

solvents containing methylene chloride, perchloroethylene, trichloroethylene, 1,1,1-trichloroethane, carbon tetrachloride, or chloroform, or any combination of these solvents, in a total concentration greater than 5 percent by weight, for cold cleaning except in a cold cleaner operated in accordance with National Emission Standards for Halogenated Solvent Cleaning, 40 CFR Parts 9 and 63, Subpart T, Sections 63.460 through 63.469 (Degreasing MACT Standards). Any person that uses the above solvent in quantities less than one gallon per week shall maintain records of the volume and formulation of such solvent on an as-used basis (recording use each day such material is used). Records shall be saved for at least five (5) years from the date of each record and shall be made available to District personnel upon request.

6. Pursuant to Rule 74.6.B.4.a, all ROC-containing solvents shall be stored in non-absorbent, non-leaking containers that shall be kept closed at all times except when filling or emptying.
7. Pursuant to Rule 74.6.B.4.b, waste solvent and waste solvent residues shall be disposed of in a manner conforming with Division 20, Chapter 6.5 of the California Health and Safety Code.
8. Pursuant to Rule 74.6.C.1, all cold cleaners, except remote reservoir cold cleaners, shall be equipped with the following devices:
 - a. A drying rack suspended above the solvent, or other facility for draining cleaned parts such that the drained solvent is returned to the cleaner.
 - b. A cover that prevents the solvent from evaporating when not processing work in the cleaner. If high volatility solvent is used, the cover must be a sliding, rolling, or guillotine (bi-parting) type that is designed to easily open and close, or it must be designed to be easily operated with one hand. A high volatility solvent is an unheated solvent with an ROC composite partial pressure of greater than 2 mmHg @ 20°C.
 - c. A freeboard height of at least 6 inches (15.2 centimeters), if low volatility solvent is used. A low volatility solvent is an unheated solvent with an ROC composite partial pressure of 2 mmHg or less @ 20°C.
 - d. At least one of the following control devices, if high volatility solvent is used:
 1. A freeboard height such that the freeboard ratio is at least 0.75.
 2. A water cover if the solvent is insoluble in and heavier than water.
 - e. A permanent conspicuous mark locating the maximum allowable solvent level that conforms with the applicable freeboard height requirement in Condition No. 8.c or 8.d.1.

- f. A permanent conspicuous label or sign summarizing the applicable operating requirements appropriate for cold cleaning operations.
9. Pursuant to Rule 74.6.C.2, remote reservoir cold cleaners shall be equipped with the following devices:
- a. A permanent conspicuous label or sign summarizing the applicable operating requirements appropriate for cold cleaning operations.
 - b. A sink-like work area that is sloped sufficiently towards the drain to preclude pooling of solvent.
 - c. A single drain hole, less than 100 square centimeters (15.5 square inches) in area, for the solvent to flow from the sink into the enclosed reservoir.
 - d. A freeboard height of at least 6 inches (15.2 centimeters).
 - e. A cover for the drain when no work is being processed in the cleaner and high volatility solvent is used. If low volatility solvent is used, a cover is not required.
10. Pursuant to Rule 74.6.D, any person who operates a cold cleaner shall conform to the following operating requirements:
- a. The operator shall drain cleaned parts of all solvent until dripping ceases to ensure that the drained solvent is returned to the cleaner.
 - b. Solvent agitation, where necessary, shall be achieved using pump recirculation, a mixer, or ultrasonics. Air agitation shall not be used.
 - c. If a solvent flow is utilized, only a solid fluid stream (not a fine, atomized, or shower type spray) shall be used.
 - d. The pressure of the solvent flow system shall be such that liquid solvent does not splash outside the container.
 - e. No person shall remove or open any required device designed to cover the solvent unless work is being processed in the cleaner or maintenance is being performed on the cleaner.
 - f. The cleaning equipment and emission control equipment shall be operated and maintained in proper working order.
 - g. The cleaning of porous or absorbent materials such as cloth, leather, wood, or rope is prohibited. This provision shall not apply to paper gaskets or paper filters.
11. Pursuant to Rule 74.6.E.1, Rule 74.6 (all requirements of this permit attachment) shall not

apply to:

- a. Cleaning activities using Clean Air Solvent, or a solvent with an ROC-content no more than 25 grams per liter as applied. A "Clean Air Solvent" is a solvent certified by the South Coast Air Quality Management District as a Clean Air Solvent.
 - b. The use of up to 160 fluid ounces of non-refillable aerosol cleaning products per day, per facility.
 - c. Janitorial cleaning including graffiti removal.
 - d. Cleaning carried out in vapor degreasers or motion picture film cleaning equipment.
 - e. Any cleaning device or mechanism regulated by National Emission Standards for Halogenated Solvent Cleaning, 40 CFR Parts 9 and 63, Subpart T, Sections 63.460 through 63.469 (Degreasing MACT Standards).
 - f. Cleaning operations subject to any of the following rules:
 - Rule 74.3, Paper, Fabric and Film Coating Operations
 - Rule 74.5.1, Petroleum Solvent Dry Cleaning
 - Rule 74.5.2, Synthetic Solvent Dry Cleaning
 - Rule 74.19, Graphic Arts Operations
 - Rule 74.19.1, Screen Printing Operations
 - Rule 74.21, Semiconductor Manufacturing
 - g. Stripping of cured coating (e.g.; stripping), cured adhesive (e.g.; debonding, unglueing), cured ink, or cured resin.
 - h. The use of solvent for purposes other than solvent cleaning activities.
12. Pursuant to Rule 74.6.E.2, Rule 74.6.B.1 (Condition No. 1 of this attachment) shall not apply to:
- a. Cleaning operations required to comply with any ROC content and/or composite vapor pressure limit in any of the following rules:
 - Rule 74.12, Surface Coating of Metal Parts and Products
 - Rule 74.13, Aerospace Assembly and Component Manufacturing Operations
 - Rule 74.14, Polyester Resin Material Operations
 - Rule 74.18, Motor Vehicle and Mobile Equipment Coating Operations
 - Rule 74.20, Adhesives and Sealants
 - Rule 74.24, Marine Coating Operations

Rule 74.24.1, Pleasure Craft Coating Operations
Rule 74.30, Wood Products Coatings

- b. Cleaning of ultraviolet lamps used to cure ultraviolet inks coatings, adhesives or resins.
- c. Cleaning of solar cells, laser hardware, scientific instruments, or high-precision optics.
- d. Cleaning conducted in laboratory tests and analyses including quality assurance/quality control applications, or bench scale or short-term (less than 2 years) research and development programs.
- e. Removal of elemental sodium from the inside of pipes and lines.
- f. Cleaning of mold release compounds from molds.
- g. Cleaning of tools used to cut or abrade cured magnetic oxide coatings.
- h. Cleaning of aerospace assembly and subassembly surfaces that are exposed to strong oxidizers or reducers such as nitrogen tetroxide, liquid oxygen or hydrazine.
- i. Cleaning of paper gaskets.
- j. Cleaning of clutch assemblies where rubber is bonded to metal by means of an adhesive.
- k. Cleaning of hydraulic actuating fluid from filters and filter housings.
- l. Removal of explosive materials and constituents from equipment associated with manufacturing, testing or developing explosives.
- m. Manufacturing cleaning of nuts and bolts designed for automotive racing applications, in a cold cleaner complying with Sections C and D of Rule 74.6 using solvent with an ROC content no more than 900 grams per liter and a ROC composite partial pressure no more than 5 mm Hg @ 20C.
- n. Cleaning of precision-lapped mechanical seals in pumps that handle liquefied gasses, in a cold cleaner complying with Sections C and D of Rule 74.6 using solvent with an ROC content no more than 900 grams per liter and a ROC composite partial pressure no more than 5 mm Hg @ 20C.
- o. Facilitywide use of less than 1 gallon per week of non-compliant solvent where compliant solvents are not available. Any person claiming this exemption shall

maintain records of the volume and formulation of non-compliant solvent used on an as-used basis (recording use each day such material is used). Records shall be saved for at least five (5) years from the date of each record and shall be made available to District personnel upon request.

13. Pursuant to Rule 74.6.E.3, Rule 74.6 Sections B.1 and B.2 (Condition Nos. 1 and 2 of this attachment) shall not apply to aircraft engine gas path cleaning or stationary gas turbine gas path cleaning using solvent with an ROC content of 200 g/l or less, as applied.
14. Pursuant to Rule 74.6.F, the permittee shall maintain a current material list showing each ROC containing material used in solvent cleaning activities. The list shall summarize the following information:
 - a. Solvent name and manufacturer's description.
 - b. All intended uses of the solvent at the facility, classified as follows:
 1. Cleanup, including application equipment cleaning, or
 2. Cleaning of electronic components, electrical apparatus components, medical devices, or aerospace components, or
 3. Solvent used pursuant to an exemption in Rule 74.6.E (specify the exemption claimed).
 - c. The ROC content in units of grams per liter of material (and ROC composite partial pressure in units of mm Hg @ 20C, if applicable) of the solvent.
 - d. If the solvent is a mix of materials blended by the operator, a record of the mix ratio.

This information shall be made available to District personnel upon request.

15. Permittee shall maintain the above records and perform routine surveillance of the applicable solvent cleaning activities to ensure that compliance with Rule 74.6 is being maintained. Upon request of the District, compliance with Rule 74.6 shall be determined using the following methods:
 - a. Pursuant to Rule 74.6.G.1, the ROC content of materials shall be determined by EPA Test Method 24 (40 CFR Part 60, Appendix A).
 - b. Pursuant to Rule 74.6.G.4, the identity of components in solvents shall be determined using manufacturer's formulation data or by using ASTM E168-67, ASTM E169-87, or ASTM E260-85.

- c. Pursuant to Rule 74.6.G.5, ROC composite partial pressure of a solvent shall be calculated using a widely accepted published source such as: Boublik, T., V. Fried and E. Hala, "The Vapor Pressure of Pure Substances," Elsevier Scientific Publishing Co., New York (1973), Perry's Chemical Engineers Handbook, McGraw-Hill Book Company, CRC Handbook of Chemistry and Physics, Chemical Rubber Publishing Company (1986-1987), and Lange's Handbook of Chemistry, John A. Dean, editor, McGraw-Hill Book Company (1985). The true vapor pressure of a component in a solvent mix may be determined by ASTM Method D2879-86. The ROC composite partial pressure of a solvent mix consisting entirely of ROC may be determined by ASTM Method D2879-86.
- d. Pursuant to Rule 74.6.G.6, the active and passive solvent losses from spray gun cleaning systems shall be determined using South Coast Air Quality Management District's "General Test Method for Determining Solvent Losses from Spray Gun Cleaning Systems" dated October 3, 1989. The test solvent for this determination shall be any lacquer thinner with a minimum vapor pressure of 105 mm Hg at 20°C. The minimum test temperature shall be 15°C.
- e. Pursuant to Rule 74.6.G.7, initial boiling point of solvent shall be determined by ASTM 1078-78 or by using a published source such as listed in Rule 74.6.G.5.

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Ventura County Air Pollution Control District
Rule 74.11.1 Applicable Requirements
Rule 74.11.1, Large Water Heaters and Small Boilers

Rule 74.11.1, "Large Water Heaters and Small Boilers"
Adopted 09/11/12, Federally Enforceable

Applicability:

This attachment applies to all natural gas-fired water heaters, boilers, steam generators or process heaters (units) with a rated heat input capacity greater than or equal to 75,000 BTU/hr and less than 1,000,000 BTU/hr at this stationary source installed after January 1, 2013 and to the future installation of any such unit at this stationary source. Note that units rated less than 1,000,000 BTU/hr are exempt from District permit requirements pursuant to Rule 23.C.1.

Conditions:

1. Pursuant to Rule 74.11.1.B.2, no person shall sell, offer for sale, or install in Ventura County any new unit with a rated heat input capacity of greater than or equal to 75,000 BTU/hr and less than or equal to 400,000 BTU/hr that does not meet the following criteria:
 - a. Oxides of nitrogen emissions shall not exceed 14 nanograms per joule of heat output (32.5 pounds per billion BTU), or 20 parts per million, and
 - b. The unit is certified in accordance with Rule 74.11.1.C.

The oxides of nitrogen emission standard required above (Condition No. 1.a) does not apply to units specifically designed to heat swimming pools, hot tubs, or spas. For such units, oxides of nitrogen emissions shall not exceed 40 nanograms per joule of heat output (93 pounds per billion BTU), or 55 parts per million.

2. Pursuant to Rule 74.11.1.B.4, no person shall sell, offer for sale, or install in Ventura County any new unit with a rated heat input capacity of greater than 400,000 BTU/hr and less than or equal to 1,000,000 BTU/hr that does not meet the following criteria:
 - a. Oxides of nitrogen emissions shall not exceed 20 parts per million and carbon monoxide emissions shall not exceed 400 parts per million, and
 - b. The unit is certified in accordance with Rule 74.11.1.C.
3. The permittee shall maintain a listing of manufacturer, brand name, model number, heat input rating, and installation date for each water heater, boiler, steam generator and

process heater, with a rated heat input capacity greater than or equal to 75,000 BTU/hr and less than 1,000,000 BTU/hr, at this stationary source. Permittee shall submit these identification records for all of these units to the District upon request.

4. On an annual basis, the permittee shall certify that all water heaters, boilers, steam generators and process heaters, with a rated heat input capacity greater than or equal to 75,000 BTU/hr and less than 1,000,000 BTU/hr, at this stationary source are complying with Rule 74.11.1. This annual certification shall include a formal survey identifying each unit and documentation of certification status (pursuant to Rule 74.11.1.C), as required.

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Ventura County Air Pollution Control District
Rule 74.22 Applicable Requirements
Rule 74.22, Natural Gas-Fired Fan-Type Central Furnaces

Rule 74.22, "Natural Gas-Fired Fan-Type Central Furnaces"
Adopted 11/09/93, Federally-Enforceable

Applicability:

This attachment applies to all natural gas-fired, fan-type central furnaces at this stationary source installed after May 31, 1994 and to the future installation of any natural gas-fired, fan-type central furnaces at this stationary source. A fan-type central furnace is a self contained space heater providing for circulation of heated air at pressures other than atmospheric through ducts of more than 10 inches in length that has a rated heat input capacity of less than 175,000 BTU per hour and, for combination heating and cooling units, a rated cooling capacity of less than 65,000 BTU per hour. Natural gas-fired, fan-type central furnaces installed in manufactured housing (mobile homes) are exempt from Rule 74.22.

Conditions:

1. Pursuant to Rule 74.22.B, no person shall install, after May 31, 1994, any natural gas-fired fan-type central furnace:
 - a. with NO_x (oxides of nitrogen) emissions in excess of 40 nanograms per joule of heat output. (74.22.B.1)
 - b. unless it is certified and identified in accordance with Section C of Rule 74.22. (74.22.B.2)
2. Permittee shall maintain a listing of manufacturer, brand name, model number, and heat input rating for each natural gas-fired fan-type central furnace at this stationary source. Permittee shall submit these identification records for all of these furnaces to the District upon request.
3. On an annual basis, permittee shall certify that all natural gas-fired fan-type central furnaces at this stationary source are complying with Rule 74.22. This annual certification shall include a formal survey identifying each natural gas-fired fan-type central furnace; whether it was installed before or after May 31, 1994; and for those furnaces installed after May 31, 1994, information indicating that the certification is contained on the furnace nameplate, or that the furnace is included on a District-provided list of certified furnaces.

9. GENERAL REQUIREMENTS FOR SHORT-TERM ACTIVITIES (ATTACHMENTS)

The general requirements for short-term activities are broadly applicable requirements that apply to temporary activities at the facility (e.g., abrasive blasting, architectural coatings, degassing operations, etc.). These are activities occurring infrequently and for a short duration. Requirements for short-term activities can normally be adequately addressed in the permit application with minimal or no reference to any specific emissions unit, provided that the scope of the requirement and the manner of its enforcement are clear.

As detailed in the Title V Permit Reissuance Application, general applicable requirements for short-term activities that apply to this facility were determined. The permit conditions associated with each requirement for a short-term activity are listed in an individual attachment. The attachment is identified with the label "Attachment (APCD Rule No.) ____" or "Attachment 40CFR61.M" in the lower left corner of each attachment.

Ventura County Air Pollution Control District
Rule 74.1 Applicable Requirements
Abrasive Blasting

Rule 74.1, "Abrasive Blasting"
Adopted 11/12/91, Federally-Enforceable

Applicability:

This attachment applies to short term activities involving any abrasive blasting operation conducted at this facility. Abrasive blasting is the operation of cleaning or preparing a surface by forcibly propelling a stream of abrasive material against that surface. Abrasive materials subject to Rule 74.1 include, but are not limited to, sand, slag, steel shot, garnet or walnut shells.

Conditions:

1. Pursuant to Rule 74.1.B.1.a, all abrasive blasting operations shall be conducted within a permanent building, except for abrasive blasting operations conducted under one or more of the following conditions as detailed in Rule 74.1.B.1.b:
 - a. Steel or iron shot/grit is used exclusively
 - b. The item to be blasted exceeds eight feet in any dimension
 - c. The surface being blasted is situated at its permanent location or no further away from its permanent location than is necessary to allow the surface to be blasted
2. Pursuant to Rule 74.1.B.1.c, any abrasive blasting that is allowed to be conducted outside of a permanent building, and is not exclusively using steel or iron shot/grit, must use one of the following:
 - a. Wet abrasive blasting
 - b. Hydroblasting
 - c. Vacuum blasting
 - d. Dry blasting with California ARB certified abrasives
3. Abrasive blasting for pavement marking shall comply with the requirements of Rule 74.1.B.2.

4. Abrasive blasting of stucco and concrete shall comply with the requirements of Rule 74.1.B.3.
5. Packages or containers for abrasives certified in accordance with Section 92530 of the California Code of Regulations used for permissible outdoor blasting shall comply with the labeling requirements of Rule 74.1.B.4.
6. Abrasive blasting operations shall comply with the visible emission standards of Rule 74.1.C.1 and the nuisance prohibition of Rule 74.1.C.2. The visible emission evaluation of abrasive blasting operations shall be conducted in accordance with Section 92400 of the California Code of Regulations.
7. Permittee shall perform routine surveillance and visual inspections of the abrasive blasting operation to ensure that compliance with Rule 74.1 is being maintained. This routine surveillance shall include assuring that operation and equipment requirements are being met, and that there are no opacity violations.

In addition, for each abrasive blasting operation conducted at the facility, permittee shall maintain records of the following information:

- a. Date of operation
- b. Type of abrasive blasting media used
- c. Identity, size, and location of item blasted
- d. Whether operation was conducted inside or outside a permanent building
- e. California ARB certifications for abrasives used

These records shall be maintained at the facility and submitted to the District upon request.

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Ventura County Air Pollution Control District
Rule 74.2 Applicable Requirements
Architectural Coatings

Rule 74.2, "Architectural Coatings"
Adopted 01/12/10, Federally-Enforceable

Applicability:

This attachment applies to short term activities involving any person who supplies, sells, offers for sale, applies or solicits the application of any architectural coating at this stationary source. An architectural coating is a coating to be applied to stationary structures or their appurtenances at the site of installation, to portable buildings at the site of installation, to pavements, or to curbs. Coatings applied in shop applications or to nonstationary structures, such as airplanes, ships, boats, railcars and automobiles, are not considered to be architectural coatings for the purposes of this rule, nor are adhesives.

This attachment and Rule 74.2 do not apply to architectural coatings that are sold in a container with a volume of one liter (1.057 quart) or less and do not apply to any aerosol coating product.

Conditions:

1. Pursuant to Rule 74.2.B.1, the volatile organic compound (VOC) content of architectural coatings shall not exceed the following standards, as found in Table 2 of Rule 74.2.B.1, unless specifically exempted by Rule 74.2:
 - a. The VOC content of flat coatings shall not exceed 50 grams per liter of coating.
 - b. The VOC content of nonflat coatings shall not exceed 100 grams per liter of coating.
 - c. The VOC content of nonflat-high gloss coatings shall not exceed 150 grams per liter of coating.

Limits are expressed as VOC Regulatory (unless otherwise specified in Rule 74.2) thinned to the manufacturer's maximum recommendation, excluding colorant added to the tint bases. VOC Regulatory is defined in Rule 74.2.

2. Pursuant to Rule 74.2.B.1, the VOC content of specialty architectural coatings shall not exceed the VOC limits in the Table of Standards in Rule 74.2, unless specifically exempted by Rule 74.2.

Specifically, the VOC content of industrial maintenance coatings shall not exceed 250 grams per liter of coating.

Limits are expressed as VOC Regulatory (unless otherwise specified in Rule 74.2) thinned to the manufacturer's maximum recommendation, excluding colorant added to the tint bases. VOC Regulatory is defined in Rule 74.2.

3. Pursuant to Rule 74.2.B.4, all architectural coating containers used to apply the contents therein to a surface directly from the container by pouring, siphoning, brushing, rolling, padding, ragging or other means, shall be closed when not in use. These architectural coating containers include, but are not limited to, drums, buckets, cans, pails, trays or other application containers. Containers of any VOC-containing materials used for thinning and cleanup shall also be closed when not in use.
4. Pursuant to Rule 74.2.B.5, no person who applies or solicits the application of any architectural coating shall apply or solicit the application of any coating that is thinned to exceed the applicable VOC limit specified in the Tables in Subsection B.1.
5. Permittee shall perform routine surveillance of the architectural coating operation to ensure that compliance with Rule 74.2 is being maintained. Permittee shall specify the usage of compliant coatings and shall maintain VOC records of coatings used at the stationary source. This information shall be submitted to the District upon request.
6. The VOC content of architectural coatings, along with other specified physical and chemical properties, shall be measured using the testing procedures in Rule 74.2.G.

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Ventura County Air Pollution Control District
Applicable Requirements for Soil Aeration Operations
Rule 74.29, Soil Decontamination Operations

Rule 74.29, "Soil Decontamination Operations"

Adopted 04/08/08, Federally-Enforceable

Applicability:

This attachment applies to short-term activities involving soils that contain gasoline, diesel fuel, or jet fuel. Rule 74.29 does not apply to soil that contains only crude oil or was contaminated by a leaking storage tank used in an agricultural operation engaged in the growing of crops or the raising of fowl or animals.

Specifically, this attachment applies to the aeration of soil that contains gasoline, diesel fuel, or jet fuel. Aeration is defined as the exposure of excavated soil, containing diesel fuel, gasoline, or jet fuel, to the atmosphere without the use of air pollution control equipment or vapor extraction, bioremediation, or bioventing system.

Remediation equipment, such as a vapor extraction system, bioremediation system, or bioventing system, for contaminated soil requires an APCD permit. Rule 74.29 requirements for such remediation equipment would be addressed in another permit attachment, if applicable. As detailed in APCD Rule 23.F.23, any soil aeration project exempt from the soil aeration limit in Rule 74.29 pursuant to Subsection C.1 or C.2 of Rule 74.29 is exempt from the requirement to obtain a permit for the soil aeration project. Also, pursuant to APCD Rule 23.F.24, any soil remediation project where collected vapors are not emitted to the atmosphere by any means is exempt from the requirement to obtain a permit.

Conditions:

1. Pursuant to Rule 74.29.B.1.a, no person shall cause or allow the aeration of soil that contains gasoline, diesel fuel, or jet fuel if such aeration emits reactive organic compounds (ROC) as measured by a certified vapor analyzer, in excess of 50 parts per million by volume (ppmv) above background, as hexane, except nonrepeatable momentary readings. In determining compliance, a portion of soil measuring three inches in depth and no less than six inches in diameter shall be removed from the soil surface and the probe inlet shall be placed near the center of the resulting hole, level with the soil surface surrounding the hole.

For each soil decontamination operation where soil aeration occurs, the permittee shall determine compliance with Rule 74.29.B.1.a on a weekly basis as detailed above. A dated record of these measurements shall be maintained at the facility and submitted to the District upon request.

2. Pursuant to Rule 74.29.B.1.b, no person shall cause or allow the aeration of soil that contains gasoline, diesel fuel, or jet fuel if such aeration causes a nuisance, as defined in the California Health and Safety Code Section 41700 and APCD Rule 51, "Nuisance". In addition, offsite aeration is prohibited.
3. Pursuant to Rule 74.29.B.2, no person shall excavate an underground storage tank and/or transfer piping currently or previously used to store an applicable compound, or excavate or grade soil containing an applicable compound, unless ROC emissions are monitored with a certified organic vapor analyzer at least once every 15 minutes during the excavation period commencing at the beginning of excavation or grading. Soil with emission measurements in excess of 50 parts per million by volume (ppmv), as hexane, shall be considered contaminated.

During excavation, all inactive exposed contaminated soil surfaces shall be treated with a vapor suppressant or covered with continuous heavy duty plastic sheeting (4 mil or greater) or other covering to minimize emissions of ROC to the atmosphere. Covering shall be in good condition, overlapped at the seams, and securely anchored to minimize headspace where vapors may accumulate.

4. Pursuant to Rule 74.29.B.5, the owner or operator of any applicable underground storage tank shall notify the District Compliance Division at least 24 hours prior to the beginning the excavation of the said storage tank and/or transfer piping.
5. Pursuant to Rule 74.29.B.6, contaminated soil in active storage piles shall be kept visibly moist by water spray, treated with a vapor suppressant, or covered with continuous heavy duty plastic sheeting (4 mil or greater) or other covering to minimize emissions of ROC to the atmosphere. Covering shall be in good condition, overlapped at the seams, and securely anchored to minimize headspace where vapors may accumulate. For any active storage pile, the surface area not covered by plastic sheeting or other covering shall not exceed 6,000 square feet. An "active" storage pile is defined as a worksite to which soil is currently being added or from which soil is being currently being removed. Activity must occur within one hour to be current.
6. Pursuant to Rule 74.29.B.7, contaminated soil in inactive storage piles shall be with covered with continuous heavy duty plastic sheeting (4 mil or greater) or other covering to minimize emissions to the atmosphere. The covering shall be in good condition, overlapped at the seams, and securely anchored to minimize headspace where vapors may accumulate.
7. Pursuant to Rule 74.29.B.8, if not removed within 30 days of excavation, on-site treatment to remove contamination from contaminated soil at an excavation or grading site shall be initiated. The treatment of contaminated soil shall be subject to all applicable District Rules and Regulations. This includes, but is not limited to,

compliance with Rule 10, "Permits Required", and Rule 51, "Nuisance".

8. Pursuant to Rule 74.29.B.9, trucks used to transport contaminated soil must meet the following requirements:
 - a. The truck and trailer shall be tarped prior to leaving the site. Contaminated material shall not be visible beyond the tarp and shall not extend above the sides or rear of the truck or trailer; and
 - b. The exterior of the truck, trailer and tires shall be cleaned prior to leaving the site.
9. Pursuant to Rule 74.29.C.2, the soil aeration requirements of Rule 74.29.B.1.a shall not apply to:
 - a. Soil excavation activities necessary for the removal of in-situ soil such as in the removal of an underground storage tank, pipe or piping system, provided the exposed soil is covered as specified in Condition No. 6 while inactive; or
 - b. Soil moving, loading, or transport activities performed for the sole purpose of complying with local, state, or federal laws, provided the soil is handled in accordance with such laws; or
 - c. Soil excavation or handling occurring as a result of an emergency as declared by an authorized health officer, agricultural commissioner, fire protection officer, or other authorized agency officer. Whenever possible, the District Compliance Division shall be notified prior to commencing such excavation; or
 - d. Any soil aeration project involving less than 1 cubic yard of contaminated soil; or
 - e. Situations where the soil contamination which resulted from a spill or release of less than five (5) gallons of diesel fuel, jet fuel, or gasoline; or
 - f. Contaminated soil used as daily cover at permitted Class III Solid Waste Disposal Sites if such soils do not have a gasoline concentration exceeding 100 parts per million by weight (ppmw) or a diesel fuel concentration exceeding 1,000 ppmw, as determined by the method specified in Rule 74.29.F.1. Daily cover is defined as soil that is applied on a daily basis or less frequently as a covering over landfill waste.

The permittee shall maintain records of the gasoline concentration and diesel fuel concentration of any contaminated soil used as daily cover that need to qualify for this exemption.

10. Pursuant to Rule 74.29.F.1, the percent by weight of contaminant in soil samples shall be determined by EPA Method 8015B. Samples shall be introduced using Method 5035 (Purge and Trap) and shall be taken in accordance with the Los Angeles Regional Water Quality Control Board's guidelines for contaminated soil sampling. Standards shall be the same as the contaminant believed to be in the soil. If the soil is contaminated with methanol 85 (M85) the standard used shall be M85.
11. Pursuant to Rule 74.29.F.3, the ROC concentration measurements required in Subsections B.1 and B.2 of the rule (Condition Nos. 1 – 3 above) shall be made using an organic vapor analyzer certified according to the requirements of EPA Method 21.
12. Pursuant to Rule 74.29.D, for any soil aeration project subject to Rule 74.29, the permittee shall record each date that the soil was disturbed and the quantity of soil disturbed on each date. These records shall be maintained at the facility and submitted to the District upon request.
13. For any soil decontamination project subject to Rule 74.29, other than a soil aeration project, the following information shall be made available to the District upon request:
 - a. All dates that soil was disturbed and the quantity of soil disturbed on each date.
 - b. Reasons for excavation or grading.
 - c. Cause of VOC soil contamination and history of the site.
 - d. Description of tanks or piping associated with the soil contamination.
 - e. Description of mitigation measures employed for dust, odors and ROC emissions.
 - f. Details of treatment and/or disposal of ROC contaminated soil, including the ultimate receptor.
 - g. Description of monitoring equipment and techniques.
 - h. All ROC emission measurements shall be recorded on a continuous permanent strip-chart or in a format approved by the Air Pollution Control Officer (APCO).
 - i. A map showing the facility layout, property line, and surrounding area up to 2500 feet away, and including any schools, residential areas or other sensitive receptors such as hospitals or locations where children or elderly people live or work.
14. The permittee shall perform routine surveillance of any soil aeration operation or underground gasoline storage tank excavation operation to ensure that compliance with

Rule 74.29.B.1 and/or 74.29.B.2 is being maintained. This routine surveillance shall include assuring that proper operation requirements are being met.

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**Ventura County Air Pollution Control District
40 CFR Part 61, Subpart M Applicable Requirements
National Emission Standard for Asbestos**

**40 CFR Part 61, Subpart M, "National Emission Standard for Asbestos"
Federally-Enforceable**

Applicability:

This attachment applies to short term activities conducted at this facility pertaining to procedures for asbestos demolition or renovation activities as detailed in 40 CFR Part 61.145.

As defined in 40 CFR Part 61.141, asbestos means the asbestiform varieties of serpentinite (chrysotile), riebeckite (crocidolite), cummingtonite-grunerite, anthophyllite, and actinolite-tremolite. Renovation means altering a facility or one or more facility components in any way, including the stripping or removal of regulated asbestos containing material (RACM) from a facility component. Operations in which load-supporting structural members are wrecked or taken out are demolitions.

Conditions:

1. Permittee shall insure compliance with 40 CFR Part 61 Subpart M, "National Emission Standard for Asbestos". The owner or operator of a demolition or renovation activity, as defined in 40 CFR Part 61.141, shall comply with the applicable inspection, notification, removal, and disposal procedures for asbestos containing materials as specified in 40 CFR Part 61.145, "Standards for Demolition and Renovation".
2. During times when asbestos renovation or demolition are underway at the facility, permittee shall ensure that all applicable requirements of 40 CFR Part 61.145 are met.

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10. GENERAL PERMIT CONDITIONS

This section contains general Part 70 permit conditions and general APCD permit to operate conditions. The general Part 70 permit conditions are associated with general federal requirements that apply to all Title V facilities. These conditions are based on APCD Rules 8, 30, 32, and 33, and 40 CFR Part 70.

The general permit to operate conditions are associated with general District requirements that apply to all operating Title V facilities. These conditions are based on APCD Rules 19, 20, 22, and 27.

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**Ventura County Air Pollution Control District
General Part 70 Permit Conditions**

1. The permittee shall comply with all federally-enforceable conditions of the Part 70 permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of an application for reissuance of the permit. (40 CFR 70.6(a)(6)(i), APCD Rule 33.3.B.1)
2. The permittee shall continue to comply with all the applicable requirements with which the company has certified that it is already in compliance. The permittee shall comply in a timely manner with applicable requirements that become effective during the permit term of this permit.
3. The permittee shall promptly report deviations from Part 70 permit requirements, including those attributable to upset conditions as defined in the Part 70 permit, the probable cause of the deviations, and any corrective actions or preventive measures taken. Promptly is defined as no later than four (4) hours after its detection by such owner or operator, or his agents or employees. (40 CFR 70.6(a)(3)(iii)(B), APCD Rule 33.3.A.3, APCD Rule 32.B.1)
4. The need to halt or reduce activity is not a defense. It shall not be a defense for a permittee in an enforcement action that it would be necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Part 70 permit. (40 CFR 70.6(a)(6)(ii), APCD Rule 33.3.B.2)
5. All required records, monitoring data, and support information shall be maintained for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Part 70 permit. All applicable reports shall be submitted to the District every 6 months and shall be certified by a responsible official. Such reports shall identify any deviations from Part 70 permit conditions. (40 CFR 70.6(a)(3)(ii)(B), 40 CFR 70.6(a)(3)(iii)(A), APCD Rule 33.3.A.3)
6. 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 Part 70 permit or to determine compliance with the Part 70 permit. Upon request, the permittee shall also furnish to the District copies of records required to be kept by the Part 70 permit or, for information claimed to be confidential, the permittee may furnish such records directly to the Administrator of the EPA along with a claim of confidentiality. (40 CFR 70.6(a)(6)(v), APCD Rule 33.3.B.5)

7. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the District or an authorized representative to perform the following:
 - a. Enter upon the permittee's premises where a Part 70 source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the Part 70 permit;
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the Part 70 permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the Part 70 permit; and
 - d. As authorized by the federal Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the Part 70 permit or applicable requirements.

(40 CFR 70.6(c)(2), APCD Rule 8, APCD Rule 33.3.B.7)

8. The Part 70 permit may be modified, revoked, reopened, reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. (40 CFR 70.6(a)(6)(iii), APCD Rule 33.3.B.3)
9. A Part 70 permit shall be reopened under the following conditions:
 - a. Additional applicable requirements under the federal Clean Air Act become applicable to the facility with a remaining Part 70 permit term of 3 or more years. Such a reopening shall be completed not later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the Part 70 permit is due to expire, unless the original Part 70 permit or any of its terms and conditions has been extended pursuant to APCD Rule 33.6.D;
 - b. Additional requirements (including excess emissions requirements) become applicable to an affected source under the acid rain program. Upon approval by the Administrator of the EPA, excess emissions offset plans shall be deemed to be incorporated into the Part 70 permit;

- c. The District or EPA determines that the Part 70 permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the Part 70 permit; or
- d. The Administrator of the EPA or the District determines that the Part 70 permit must be revised or revoked to assure compliance with the applicable requirements.

(40 CFR 70.7(f), APCD Rule 33.8.A)

- 10. All fees required by District Regulation III, Fees, shall be paid on a timely basis as requested by the District. Notwithstanding the term of the Part 70 permit, if the permittee fails to pay the annual renewal fees required pursuant to APCD Rule 42.H within the time period specified in APCD Rule 30, the Part 70 permit will be void. (40 CFR 70.6(a)(7), APCD Rule 30, APCD Rule 33.3.B.6)
- 11. The Part 70 permit does not convey any property rights of any sort, or any exclusive privilege. (40 CFR 70.6(a)(6)(iv), APCD Rule 33.3.B.4)
- 12. The provisions of this Part 70 permit shall be severable, and in the event of any challenge to any portion of the permit, or if any portion is held invalid, the remaining permit conditions shall remain valid and in force. (40 CFR 70.6(a)(5), APCD Rule 33.3.B.8)
- 13. An application for reissuance of this Part 70 Permit shall be submitted no more than 18 months prior to the expiration date and no less than 6 months prior to the expiration date as stated on this permit. The application shall be subject to the same procedural requirements, including those for public participation and EPA review, that apply to initial Part 70 permit issuance. (40 CFR 70.5(a)(1)(iii), 40 CFR 70.7(c)(1)(i), APCD Rule 33.6.B)
- 14. Any Part 70 application and any document, including reports, schedule of compliance progress reports, and compliance certification, required by this Part 70 permit shall be certified by a responsible official. The certification shall state that, based on information and belief formed after a reasonable inquiry, the statements and information in the document are true, accurate, and complete (40 CFR 70.5(d), APCD Rule 33.9.C)
- 15. Permittee shall submit a certification of compliance with all applicable requirements and all Part 70 permit conditions. A compliance certification shall be submitted with any Part 70 permit application and annually, on the anniversary date of the Part 70 permit, or on a more frequent schedule if required by an applicable requirement or permit condition.

This compliance certification shall identify each applicable requirement or condition of the Part 70 permit, the compliance status of the stationary source, whether the compliance

was continuous or intermittent since the last certification, and the method(s) used to determine compliance. In addition, the certification shall indicate the stationary source's compliance status with any applicable enhanced monitoring and compliance certification requirement of the federal Clean Air Act. A copy of each compliance certification shall be submitted to EPA Region IX. (40 CFR 70.5(c)(9), 40 CFR 70.6(c)(5), APCD Rule 33.3.A.9, APCD Rule 33.9.B)

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**Ventura County Air Pollution Control District
General Permit to Operate Conditions**

1. Within 30 days after receipt of a permit to operate, the permittee may petition the Hearing Board, in writing, to review any new or modified condition on the permit. (APCD Rule 22)
2. This permit to operate, or a copy, shall be posted reasonably close to the subject equipment and shall be readily accessible to inspection personnel from the District. Posting a copy of the "Permitted Equipment and Applicable Requirements Table" contained in Section No. 2 will fulfill this requirement if the entire permit to operate is readily available at another location at the stationary source. (APCD Rule 19)
3. This permit to operate is not transferable from one location to another unless the equipment is specifically listed as being portable. (APCD Rule 20)
4. If, within a reasonable amount of time, any permittee refuses to furnish information requested by the District, the District may suspend this permit to operate. The permittee will be informed, in writing, of the permit suspension and the reasons for the suspension. (APCD Rule 27)

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11. MISCELLANEOUS FEDERAL PROGRAM CONDITIONS

This section contains miscellaneous federal program conditions that are not emission unit-specific or short-term. These federal requirements are broadly applicable requirements that apply and are enforced in the same manner for all subject emissions units or short-term activities. Permit conditions associated with these miscellaneous federal program requirements are listed in an individual attachments. The attachment is identified with the label “Attachment 40CFR(Part No.) ___” in the lower left corner of each attachment.

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**Ventura County Air Pollution Control District
40 CFR Part 68 Applicable Requirements
Accidental Release Prevention and Risk Management Plans**

**40 CFR Part 68, "List of Regulated Substances and Thresholds for Accidental Release Prevention"
Federally-Enforceable**

Applicability:

This attachment applies to regulated substances that are contained in a process at this facility and that exceed the threshold quantity, as presented in 40 CFR Part 68.130. This regulation addresses the requirements of section 112(r) of the federal Clean Air Act as amended. Specifically, this attachment applies to a facility that has stated that a federal Risk Management Plan pursuant to section 112(r) is currently not required, but where flexibility is desired to preclude a permit reopening should 40 CFR Part 68 become an applicable requirement.

Conditions:

1. Should the stationary source, as defined in 40 CFR Part 68.3, become subject to Part 68, then the owner or operator shall submit a risk management plan (RMP) by the date specified in Part 68.10 and shall certify compliance with the requirements of Part 68 as part of the annual compliance certification as required by 40 CFR Part 70.

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Ventura County Air Pollution Control District
40 CFR Part 82 Applicable Requirements
Protection of Stratospheric Ozone

40 CFR Part 82, "Protection of Stratospheric Ozone"

40 CFR Part 82, Subpart B, "Servicing of Motor Vehicle Air Conditioners"

40 CFR Part 82, Subpart F, "Recycling and Emissions Reduction"

Federally-Enforceable

Applicability:

This attachment applies to activities conducted at this facility that involve producing, importing, exporting, or consuming of the specified controlled substances described under 40 CFR Part 82.4. Specifically, this attachment includes the requirements of 40 CFR Part 82, Subpart B, "Servicing of Motor Vehicle Air Conditioners", and 40 CFR Part 82, Subpart F, "Recycling and Emissions Reduction".

As defined in 40 CFR Part 82.30, 40 CFR Part 82, Subpart B applies to any person performing service on a motor vehicle for consideration when this service involves the refrigerant in the motor vehicle air conditioner.

As defined in 40 CFR Part 82.150, 40 CFR Part 82, Subpart F applies to any person servicing, maintaining or repairing appliances, except for motor vehicle air conditioners. This subpart also applies to persons disposing of appliances, including motor vehicle air conditioners. An appliance is any device which uses a class I or class II substance as a refrigerant and which is used for household or commercial purposes, including any air conditioner, refrigerator, chiller, or freezer.

Conditions:

1. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, "Servicing of Motor Vehicle Air Conditioners".

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.

2. If the permittee performs maintenance on, or services, repairs, or disposes of appliances, the permittee is subject to all of the applicable requirements as specified in 40 CFR Part 82, Subpart F, "Recycling and Emissions Reduction".

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12. PART 70 PERMIT APPLICATION PACKAGE

The Part 70 permit application, which was submitted by this facility, is included in this section for reference only and is not a part of the Part 70 permit.

During the processing of the permit application, additional information was submitted by the facility in response to District requests. This additional information is included with the application. If the applicant was asked to replace a page or a portion of the application, the original submittal is stamped "REPLACED" and the replacement page or section is placed in front of the original. The applicant and District correspondence for the Part 70 permit application is located in the District permit file for this stationary source.

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