

Bay Area Air Quality Management District

939 Ellis Street
San Francisco, CA 94109
(415) 771-6000

**Permit Evaluation
and
Statement of Basis
For
Minor Revision to the
MAJOR FACILITY REVIEW PERMIT**

for
Owens-Brockway Glass Container, Inc.
Facility #A0030

Facility Address:
3600 Alameda Avenue
Oakland, CA 94601

Mailing Address:
One Seagate
Toledo, OH 43666

May 28, 2008

Application Engineer: Weyman Lee
Site Engineer: Weyman Lee

Application: 17196

TABLE OF CONTENTS

A.	Background.....	2
B.	NSR Permit Evaluation.....	2
C.	Supplemental Information	3
I.	Standard Conditions.....	3
II.	Equipment.....	3
III.	Generally Applicable Requirements.....	3
IV.	Source-Specific Applicable Requirements	3
V.	Schedule of Compliance	3
VI.	Permit Conditions	4
VII.	Applicable Limits and Compliance Monitoring Requirements.....	5
VIII.	Test Methods.....	5
IX.	Permit Shield:	5
X.	Revision History	6
XI.	Glossary	7
D.	Alternate Operating Scenarios:.....	7
F.	Differences between the Application and the Proposed Permit:	7

Title V Statement of Basis

A. Background

This facility is subject to the Operating Permit requirements of Title V of the federal Clean Air Act, Part 70 of Volume 40 of the Code of Federal Regulations (CFR), and BAAQMD Regulation 2, Rule 6, Major Facility Review because it is a major facility as defined by BAAQMD Regulation 2-6-212. It is a major facility because it has the “potential to emit,” as defined by BAAQMD Regulation 2-6-218, of more than 100 tons per year of a regulated air pollutant.

Major Facility Operating permits (Title V permits) must meet specifications contained in 40 CFR Part 70 as contained in BAAQMD Regulation 2, Rule 6. The permits must contain all applicable requirements (as defined in BAAQMD Regulation 2-6-202), monitoring requirements, recordkeeping requirements, and reporting requirements. The permit holders must submit reports of all monitoring at least every six months and compliance certifications at least every year.

In the Bay Area, state and District requirements are also applicable requirements and are included in the permit. These requirements can be federally enforceable or non-federally enforceable. All applicable requirements are contained in Sections I through VI of the permit.

Each facility in the Bay Area is assigned a facility identifier that consists of a letter and a 4-digit number. This identifier is also considered to be the identifier for the permit. The identifier for this facility is A0030.

The proposed minor permit revision to the Major Facility Review Permit for Owens Brockway Glass Company (OB) is evaluated under Permit Application #17196. The revision incorporates modifications in Permit Applications #14034 and #17195 described below.

Permit Application #14034: Sources S-25, S-27, S-29, S-30, S-32 and S-33 are Hot End Surface Treatment (HEST) sources that apply a coating onto glass containers to make them resistant to scratches. The coating used at these sources has been changed from stannic chloride to monobutyltin trichloride (MBTT).

Permit Application #17195: Owens Brockway Glass Company (OB) proposed to modify Source S-10, Furnace C, to add a forming line. The new forming line will replace the C-1 forming line (that included S-24 and S-31 HEST) that was taken out of service in 2000. The applicant stated that the C-1 forming line was dismantled and the parts have been removed from the Oakland site. The new forming line will be entirely new, and installed in the same location as C-1, but will not increase the capacity of the furnace since it is an “identical” replacement. New sources S-135 C-1a Forming Line and S-136 HEST will replace sources S-75 C-1 Forming Line and S-24 and 31 HEST.

B. NSR Permit Evaluation

See Appendix for the Permit Evaluations for Applications Nos. 14034 and 17195.

C. Supplemental Information

I. Standard Conditions

This section contains administrative requirements and conditions that apply to all facilities.

The dates in Section I.B. are updated.

II. Equipment

This section of the permit lists all permitted or significant sources. Each source is identified by an S and a number (e.g., S24).

The following sources are added: S-135 C-1a Forming Line and S-136 Hot End Surface Treatment.

The following sources are deleted: S-24 and S-31 Hot End Surface Treatment (HEST), and S-75 C-1 Forming Line.

III. Generally Applicable Requirements

This section of the permit lists requirements that generally apply to all sources at a facility including insignificant sources and portable equipment that may not require a District permit.

None

IV. Source-Specific Applicable Requirements

Section IV of the permit contains citations to all of the applicable requirements. The text of the requirements is found in the regulations, which are readily available on the District's or EPA's websites, or in the permit conditions, which are found in Section VI of the permit.

Complex Applicability Determinations

None

Other changes in this action

Table IV-D has been modified to add source S-136 and to delete sources S-24 and S-31. The requirements of Permit Condition #23142 have been added and requirements of Permit Condition #8395 have been deleted for sources S-25, S-27, S-29, S-30, S-32, S-33 and S-136, all of which are Hot End Surface Treatment sources.

Table IV-E has been modified to delete S-75 C-1 Forming Line and to add S-135 C-1a Forming Line.

V. Schedule of Compliance

A schedule of compliance is required in all Title V permits pursuant to BAAQMD Regulation 2-6-409.10 which provides that a major facility review permit shall contain the following information and provisions:

“409.10 A schedule of compliance containing the following elements:

- 10.1 A statement that the facility shall continue to comply with all applicable requirements with which it is currently in compliance;
- 10.2 A statement that the facility shall meet all applicable requirements on a timely basis as requirements become effective during the permit term; and
- 10.3 If the facility is out of compliance with an applicable requirement at the time of issuance, revision, or reopening, the schedule of compliance shall contain a plan by which the facility will achieve compliance. The plan shall contain deadlines for each item in the plan. The schedule of compliance shall also contain a requirement for submission of progress reports by the facility at least every six months. The progress reports shall contain the dates by which each item in the plan was achieved and an explanation of why any dates in the schedule of compliance were not or will not be met, and any preventive or corrective measures adopted.”

Since the District has not determined that the facility is out of compliance with an applicable requirement, the schedule of compliance for this permit contains only sections 2-6-409.10.1 and 2-6-409.10.2.

VI. Permit Conditions

The regulatory basis is listed following each condition. The regulatory basis may be a rule or regulation. The District is also using the following terms for regulatory basis:

- BACT: This term is used for a condition imposed by the Air Pollution Control Officer (APCO) to ensure compliance with the Best Available Control Technology in Regulation 2-2-301.
- Cumulative Increase: This term is used for a condition imposed by the APCO which limits a source’s operation to the operation described in the permit application pursuant to BAAQMD Regulation 2-1-403.
- Offsets: This term is used for a condition imposed by the APCO to ensure compliance with the use of offsets for the permitting of a source or with the banking of emissions from a source pursuant to Regulation 2, Rules 2 and 4.
- PSD: This term is used for a condition imposed by the APCO to ensure compliance with a Prevention of Significant Deterioration permit issued pursuant to Regulation 2, Rule 2.
- TRMP: This term is used for a condition imposed by the APCO to ensure compliance with limits that arise from the District’s Toxic Risk Management Policy.

All changes to existing permit conditions are clearly shown in “strike-out/underline” format in the proposed permit. When the permit is issued, all ‘strike-out’ language will be deleted and all “underline” language will be retained, subject to consideration of comments received.

Additional monitoring has been added, where appropriate, to assure compliance with the applicable requirements.

Changes in this action

Permit Condition #8395 has been deleted and replaced with Permit Condition #23142.

Permit Condition #15855 has been modified by deleting S-75 and replacing it with S-135.

VII. Applicable Limits and Compliance Monitoring Requirements

This section of the permit is a summary of numerical limits and related monitoring requirements for each source. The summary includes a citation for each monitoring requirement, frequency of monitoring, and type of monitoring. All applicable requirements for monitoring are contained in Sections IV, Source-Specific Applicable Requirements, and VI, Permit Conditions, of the permit.

The District has reviewed all monitoring and has determined the existing monitoring is adequate.

Discussion of Other Limits:

The permit contains other limits, such as HAP limits, hours of operation, and heat input. There is adequate monitoring for these limits in the standards or permit conditions.

Table VII-D: Emissions rate limits for POC, FP, HCl, and NH₃ have been initially source tested, and are required to be source tested every five years thereafter (the initial test). The particulate requirement in Permit Condition #23142 is more stringent than the opacity and maximum grain loading requirements of District Regulation 6.

Table VII-E: Modified by deleting S-75 and replacing it with S-135.

VIII. Test Methods

This section of the permit lists test methods that are associated with standards in District or other rules. It is included only for reference. In most cases, the test methods in the rules are source test methods that can be used to determine compliance but are not required on an ongoing basis. They are not applicable requirements.

If a rule or permit condition requires ongoing testing, the requirement will also appear in Section IV of the permit.

IX. Permit Shield:

The District rules allow two types of permit shields. The permit shield types are defined as follows: (1) A provision in a major facility review permit explaining that specific federally enforceable regulations and standards do not apply to a source or group of sources, or (2) A provision in a major facility review permit explaining that specific federally enforceable applicable requirements for monitoring, recordkeeping and/or reporting are subsumed because other applicable requirements for monitoring, recordkeeping, and reporting in the permit will assure compliance with all emission limits.

The second type of permit shield is allowed by EPA's White Paper 2 for Improved Implementation of the Part 70 Operating Permits Program. The District uses the second type of permit shield for all streamlining of monitoring, recordkeeping, and reporting requirements in Title V permits. The District's program does not allow other types of streamlining in Title V permits.

This facility has the first type of permit shield.

X. Revision History

This section contains the details of issuance and revisions for each permit.

Title V Permit Issuance (Application 25846):

January 5, 2000

Minor Revision/Administrative Permit Amendment: (no application) October 2, 2000

Corrections in capacity of S-11, Furnace; S-12, Furnace; and S-39, Raw Material Unloading Station.
Change in the deadline for installation of NOx monitor.
Change in recordkeeping for glass production.
Condition I.J added to standard conditions regarding enforceability of stated capacity.

Replacement of Responsible Official (no application)

September 24, 2001

Significant Revision (Applications 6869/6876)

July 15, 2004

Deletion source test requirement for S39, S57, S75-S77, S79-S81, S83, S84, S97

Corrected citation of abatement devices for S43, S44, S48, S50, S52, S56, S58

Monitoring has been removed from S-43 and S-44

The description of the BAAQMD 6-301 limit in BAAQMD

Condition 15855, part 2 has been corrected to say "for no more than three minutes in any hour."

The description of the BAAQMD 6-301 limit in Section VII has been corrected to say "for ≤ 3 min/hr."

BAAQMD 6-310 and 6-311 were deleted from the Section IV and VII tables for S39, S57, S75-S77, S79-S81, S83, and S84, because these standards apply only to sources that have stacks.

The term "TSP" in Section VII has been changed to "FP", which means "filterable particulate."

The dates in Section I.A.1 were updated.

Section I.A.11, which requires the responsible official to certify all documents submitted, was added to conform to changes in Regulation 2, Rule 6.

Section I.E.1 requiring the permit holder to provide any information, records, and reports requested or specified by the APCO, was added because it was omitted in error.

Section I.H was modified to conform to the current standard.

Significant Revision, continued (Applications 6869/6876)

July 15, 2004

The Abatement device table, II-B, has been modified so that there is no confusion between the citation of standards and the standards themselves.

Sections III, IV, and XI have been modified because SIP standards are now found on EPA's website and are not included as part of the permit.

40 CFR Part 61, Subpart M, National Emission Standard for Asbestos, was added to Section III. This standard is equivalent to BAAQMD Regulation 11, Rule 2, which has been cited in the permit since it was issued in 2000.

Therefore, this is not a substantive change.

The standard language in the Section IX, Permit Shield, was updated.

The glossary was updated.

Condition #16591 part 4 has been amended to include the correct list of abatement devices and remove A-1 since it is already contained in Condition #8395.

Renewal of Title V Permit (Application: 10138) March 21, 2006

Minor Revision (Application 17196)

Section I.B.1, permit dates have been corrected to reflect the March 21, 2006 renewal.

Changed surface treatment agent from stannic chloride to Monobutyltin Trichloride (MBTT) at Sources S-25, 27, 29, 30, 32, and 33 Hot Bottle Surface Treatment. Permit Condition #8395 was deleted and replaced with Permit Condition #23142 (Application # 14034).

Sources S-135 C-1a Forming Line and S-136 HEST replaced sources S-75 C-1 Forming Line and S-24 and 31 HEST (Application #17195).

XI. Glossary

This section contains terms that may be unfamiliar to the general public or EPA.

D. Alternate Operating Scenarios:

No alternate operating scenario has been requested for this facility.

F. Differences between the Application and the Proposed Permit:

None

APPENDIX A
GLOSSARY

ACT

Federal Clean Air Act

APCO

Air Pollution Control Officer

ARB

Air Resources Board

BAAQMD

Bay Area Air Quality Management District

BACT

Best Available Control Technology

Basis

The underlying authority which allows the District to impose requirements.

CAA

The federal Clean Air Act

CAAQS

California Ambient Air Quality Standards

CAPCOA

California Air Pollution Control Officers Association

CEM

Continuous Emission Monitor

CEQA

California Environmental Quality Act

CFR

The Code of Federal Regulations. 40 CFR contains the implementing regulations for federal environmental statutes such as the Clean Air Act. Parts 50-99 of 40 CFR contain the requirements for air pollution programs.

CO

Carbon Monoxide

Cumulative Increase

The sum of permitted emissions from each new or modified source since a specified date pursuant to BAAQMD Rule 2-1-403, Permit Conditions (as amended by the District Board on 7/17/91) and SIP Rule 2-1-403, Permit Conditions (as approved by EPA on 6/23/95). Cumulative increase is used to determine whether threshold-based requirements are triggered.

District

The Bay Area Air Quality Management District

dscf

Dry Standard Cubic Feet

EPA

The federal Environmental Protection Agency.

Excluded

Not subject to any District regulations.

FDOC

Final Determination of Compliance (FDOC), prepared pursuant to District Regulation 2, Rule 3, Power Plants.

Federally Enforceable, FE

All limitations and conditions which are enforceable by the Administrator of the EPA including those requirements developed pursuant to 40 CFR Part 51, subpart I (NSR), Part 52.21 (PSD), Part 60 (NSPS), Part 61 (NESHAPs), Part 63 (MACT), and Part 72 (Permits Regulation, Acid Rain), including limitations and conditions contained in operating permits issued under an EPA-approved program that has been incorporated into the SIP.

FP

Filterable Particulate as measured by BAAQMD Method ST-15, Particulate.

HAP

Hazardous Air Pollutant. Any pollutant listed pursuant to Section 112(b) of the Act. Also refers to the program mandated by Title I, Section 112, of the Act and implemented by 40 CFR Part 63.

HRSG

Heat Recovery Steam Generator

Major Facility

A facility with potential emissions of: (1) at least 100 tons per year of regulated air pollutants, (2) at least 10 tons per year of any single hazardous air pollutant, and/or (3) at least 25 tons per year of any combination of hazardous air pollutants, or such lesser quantity of hazardous air pollutants as determined by the EPA administrator.

MFR

Major Facility Review. The District's term for the federal operating permit program mandated by Title V of the Federal Clean Air Act and implemented by District Regulation 2, Rule 6.

MOP

The District's Manual of Procedures.

NAAQS

National Ambient Air Quality Standards

NESHAPS

National Emission Standards for Hazardous Air Pollutants. See in 40 CFR Parts 61 and 63.

NMHC

Non-methane Hydrocarbons (Same as NMOC)

NMOC

Non-methane Organic Compounds (Same as NMHC)

NO_x

Oxides of nitrogen.

NSPS

Standards of Performance for New Stationary Sources. Federal standards for emissions from new stationary sources. Mandated by Title I, Section 111 of the Federal Clean Air Act, and implemented by 40 CFR Part 60 and District Regulation 10.

NSR

New Source Review. A federal program for pre-construction review and permitting of new and modified sources of pollutants for which criteria have been established in accordance with Section 108 of the Federal Clean Air Act. Mandated by Title I of the Federal Clean Air Act and implemented by 40 CFR Parts 51 and 52 and District Regulation 2, Rule 2. (Note: There are additional NSR requirements mandated by the California Clean Air Act.)

Offset Requirement

A New Source Review requirement to provide federally enforceable emission offsets for the emissions from a new or modified source. Applies to emissions of POC, NO_x, PM₁₀, and SO₂.

Phase II Acid Rain Facility

A facility that generates electricity for sale through fossil-fuel combustion and is not exempted by 40 CFR 72 from Titles IV and V of the Clean Air Act.

POC

Precursor Organic Compounds

PM

Particulate Matter

PM₁₀

Particulate matter with aerodynamic equivalent diameter of less than or equal to 10 microns

PSD

Prevention of Significant Deterioration. A federal program for permitting new and modified sources of those air pollutants for which the District is classified "attainment" of the National Air Ambient Quality Standards. Mandated by Title I of the Act and implemented by both 40 CFR Part 52 and District Regulation 2, Rule 2.

PUC

Public Utilities Commission (California)

SIP

State Implementation Plan. State and District programs and regulations approved by EPA and developed in order to attain the National Air Ambient Quality Standards. Mandated by Title I of the Act.

SO₂

Sulfur dioxide

THC

Total Hydrocarbons (NMHC + Methane)

Title V

Title V of the federal Clean Air Act. Requires a federally enforceable operating permit program for major and certain other facilities.

TOC

Total Organic Compounds (NMOC + Methane, Same as THC)

TPH

Total Petroleum Hydrocarbons

TRMP

Toxic Risk Management Plan

TSP

Total Suspended Particulate

VOC

Volatile Organic Compounds

Units of Measure:

bhp	=	brake-horsepower
btu	=	British Thermal Unit
cfm	=	cubic feet per minute
g	=	grams
gal	=	gallon
gpm	=	gallons per minute
hp	=	horsepower
hr	=	hour
lb	=	pound
in	=	inches
max	=	maximum
m ²	=	square meter
min	=	minute
mm	=	million
MMbtu	=	million btu
MMcf	=	million cubic feet
ppmv	=	parts per million, by volume
ppmw	=	parts per million, by weight
psia	=	pounds per square inch, absolute
psig	=	pounds per square inch, gauge
scfm	=	standard cubic feet per minute
yr	=	year

APPENDIX B

Engineering Evaluation for
Application Nos. 14034 and 17195

Evaluation Report
Owens-Brockway Glass Container, Inc.
Plant #30
Application Number 17195

Background

Owens-Brockway Glass Container (OB), a subsidiary of Owens-Illinois, is located in Oakland. The company manufactures glass beverage bottles of various sizes and colors. Recycled glass (cullet) is crushed and used to make new glass, although the company will use sand if insufficient quantities of recycled glass are available. Other raw materials used in the manufacturing process include soda ash and limestone.

The manufacturing process begins in a furnace that melts cullet, sand, soda ash, limestone, and other raw materials in a temperature range between 2,300 and 2,800° F. A Refiner distributes the molten glass to the hearth, which makes the temperature of the molten glass uniform. The molten glass is sheared and cut into uniform gobs and fall into forming machines that forms the molten gobs into the mold shape. Formed glass bottles are cooled rapidly to change phase from liquid to solid. The bottles are placed in an annealing lehr, where their temperature is raised close to the melting point and then gradually lowered again. This heat treatment eliminates the stress in the bottles or jars to make them stronger and shock resistant.

OB is proposing to modify Source S-10, Furnace C, to add a forming line. The new forming line replace the C-1 forming line that was taken out of service in 2000. The applicant stated that the C-1 forming line was dismantled and the parts have been removed from the Oakland site. The new forming line will be entirely new, and installed in the same location as C-1, but will not increase the capacity of the furnace since it is a replacement.

It should be noted the applicant has never submitted a requested to cancel the permits for the C-1 Forming Line and associated sources that include S-75 C-1 Forming Line, S-110 Annealing Lehr (exempt), S-24 and S-31 HEST sources, and S-120 Cold End Treatment (exempt). Consequently, the District has treated these sources as being current.

OB has submitted an application for altering:

S-10 Glass Melting Furnace C

And Authorities to Construct/Permit to Operate:

S-135 C-1A Forming Machine

S-136 Hot End Bottle Surface Treatment

S-135 Forming Machine will replace S-75, and S-136 HEST will replace S-24 and S-31.

Emission Calculations

No emission increases to the S-10 furnace are expected as a result of this application. The maximum throughput of 125,000 tons glass pulled and associated emissions will remain unchanged.

The emissions from the new C-135 C-1A Forming Machine is estimated using emissions factors from EPA AP-42 11.15 for Glass Manufacturing. Table 11.15-1 indicates that emissions of criteria pollutants are either negligible or non-detectable, except for organic emissions that originate from decorating processes. OB has stated that “there will be no decorating equipment for this production line (C-1A)” in an email date May 9, 2008. Therefore there will be not net increase in emissions charged to this source.

Source S-136 is an application of an exterior coating to the bottles to increase line mobility, reduce abrasions and to maintain the inherent strength of the glass containers. The calculation method will use same emission factors used for the other HEST operations at the plant (from Application #17195):

	Emission Factor¹	Throughput	Emissions	Emissions	Emissions
Pollutant	(lb/gal)	(gal/yr)	(lb/day)	(lb/yr)	(ton/yr)
POC	0.62	950	1.6	589	0.29
PM ₁₀	0.55	950	1.4	522.5	0.26
HCl	0.0581	950		55.195	0.03

¹ source test results indicate the following emission factors: POC 0.56 lb/gal, PM10 0.06 lb/gal, HCl 0.004 lb/gal

Plant Cumulative Increase

Pollutant	Current (ton/yr)	New (ton/yr)	Total (ton/yr)
POC	1.767	0.29	2.057
NO _x	0	0	0
SO ₂	0	0	0
PM ₁₀	0.94	0.26	1.2
CO	0	0	0

Toxic Risk Screening Analysis

Source S-136 is expected to run continuously year-round. Therefore HCl emissions rates are 6.3E-03 lb/hr and 5.5E01 lb/yr. The risk screening trigger levels are 4.6E00 lb/hr and 3.5E02. The expected HCl emissions from S-136 do not exceed their respective trigger levels, and is not subject to a risk screening analysis pursuant to Regulation 2-5.

Statement of Compliance

The installation of the replacement forming line is not deemed a significant revision per section 2-6-226 for the purposes of Title V. The facility has submitted an application (#17196) to modify the Major Facility Permit.

The S-10 C Furnace is deemed an altered source pursuant to Regulation 2-1-233.2.

S-135 will comply with Regulation 6-1-301 for visible emissions and 6-1-305 for visible particles.

S-136 will comply with Regulation 8-4-302.1, which requires that VOC emissions not exceed 5 tons per calendar year.

The maximum daily POC and PM₁₀ emissions from S-136 are less than 10 pounds per day, and therefore will not trigger BACT in accordance with Regulation 2-2-301. Source S-135 emissions are negligible according to guidance given by the EPA AP-42 Chapter 11.

S-136 does not trigger the offsets requirement for POC and PM₁₀ emissions pursuant to Regulations 2-2-302 and 2-2-303.

The project is not subject to CEQA under Regulation 2-1-312.6 since the evaluation is a ministerial action conducted using fixed standards and objective measurements. Therefore the applicant does not need to submit CEQA related information to deem the application complete.

This project is not within 1000 feet from the nearest school and is therefore not subject to the public notification requirements of Reg.2-2-412.

A risk analysis was not required for this application since the toxic emissions did not exceed the respective trigger levels.

NSPS, NESHAPS, and PSD do not apply to this application.

Recommendation

It is recommended that an Alteration be issued to Owens Brockway for:

S-10 Glass Melting Furnace C

and an Authority to Construct be granted for:

S-135 C-1A Forming Machine

S-136 Hot End Bottle Surface Treatment

Conditions

Condition #15855 for S-135

S-39, Ray Material Unloading Station; S-57, Ecology Cullet Elevator; S-67, Mold Repair Coating Oven; ~~S-75~~, S-76, S-77, S-79, S-80, S-81, S-83, S-84, S-135 Forming Machines

1. deleted per Source Test recommendation

2. The owner/operator of S-39, S-57, S-67, ~~S-75~~, S-76, S-77, S-79, S-80, S-81, S-83, S-84 and S-84-135 shall conduct weekly visible emissions monitoring in order to determine compliance with Regulations 6-301 using either District method or EPA Method 9, and shall not exceed a Ringelmann 1.0 for more than three minutes in any hour. Weekly records of visible emissions data shall be retained on site for at least five years from the date of entry and be made available to District staff upon request.

(basis: Regulation 2-6-501)

Condition #23142 for S-136

S-25, 27, 29, 30, 32, 33 and ~~33-136~~
Applications Nos. 14034 & 17195

1. The owner/operator of S-25, 27, 29, 30, 32, 33 and ~~S-33-136~~ shall not exceed 950 gallons of MBTT per source in any consecutive 12 month period. (cumulative increase)

2. The owner/operator of S-25, 27, 29, 30, 32, 33 and ~~S-33-136~~ shall not exceed the following emission rates: 0.62 #POC/gallon of MBTT, 0.55 #PM/gallon MBTT, 0.058 #HCl/gallon of MBTT, and 0.85 #NH3/hour. (cumulative increase/offsets)

3. The owner/operator of S-25, 27, 29, 30, 32, 33 and ~~S-33-136~~ shall conduct a ~~district~~ District approved source test at the outlet of A-1 ~~within 90 days after the switch to MBTT has been completed at all~~ that is downstream of S-25, 27, 29, 30, 32, 33 and ~~S-33-136~~, and once every 5 years thereafter ~~thereafter~~ after the initial source test conducted on February 13, 2007, in order to demonstrate compliance with condition #2. The results of the source test shall be submitted to ~~district~~ District within 30 days of the test date. The source test for PM shall include both TSP and condensable PM emissions as determined by EPA Method 5/202. (cumulative increase)

4. The owner/operator of S-25, 27, 29, 30, 32, 33 and ~~S-33-136~~ shall maintain a district approved monthly log of all material (MBTT) throughput ~~at for each~~ HEST source, S-25, 27, 29, 30, 32, 33 and ~~S-33-136~~, and of all source test results. This log shall be kept on site for at least 5 years from the date of entry and be made available to district staff upon request. (Recordkeeping)

by _____ date _____
Weyman Lee
Senior Air Quality Engineer