



May 25, 2023

VIA E-Mail

Director of Compliance and Enforcement  
Bay Area Air Quality Management District  
375 Beale Street Suite 600  
San Francisco, CA 94105  
Attn: Title V Reports  
[compliance@baaqmd.gov](mailto:compliance@baaqmd.gov)

TV Tracking #: 723

1.  RECEIVED IN  
ENFORCEMENT: 05/25/2023

SUBJECT: Title V Semi-Annual Monitoring Report #1  
Reporting Period: November 1, 2022 to April 30, 2023  
Shell Catalysts & Technologies  
Bay Point, CA - Facility #A0227

Director of Compliance & Enforcement,

In accordance with Bay Area Air Quality Management District (BAAQMD) Regulation 2, Rule 6, Section 502, enclosed is the Title V Semi-Annual Monitoring Report for the monitoring period of November 1, 2022 to April 30, 2023 for Shell Catalysts & Technologies (Shell Catalysts).

Report Summary

During this reporting period (November 1, 2022 to April 30, 2023), there was one deviation from Regulation 1-523.1. A short summary of the event and investigation is listed below.

***RCA #08N98 – November 29, 2022 – Late Reporting of Inoperable Monitor X3 CEMs Flow Meter***

On Tuesday November 29, 2022 @~6AM, the parametric flow meter for the X3 CEMs (for S606, A605, A606) started to malfunction. This made the daily poundage totals from the NOx and CO CEMs inaccurate. The flow rate readings slowly deteriorated over the next several days but were masked due to overall low NOx and CO generation from the product being made. The unit was on a recycle run, which did not use any of the gas fired equipment, and generated very low amounts of NOx and CO. The effects of the slowing and inaccurate flow meter were hard to distinguish by Operations and therefore, took several days to be discovered. When the Inoperable Monitor was discovered and reported, it was outside of the Reg 1-523.1 reporting requirement of the next business day.

**Summary of Investigation**

On Monday December 5<sup>th</sup>, the Systems Engineer recognized abnormally low NOx and CO levels from a new product run completed over the weekend (which was not recycle) and found the malfunctioning flow meter. After reviewing the previous days' data, it was discovered the flow meter malfunction started on Tuesday November 29, 2022 at approximately 6AM. Importantly, concentrations of NOx and CO were properly recorded by the CEMs during the flowmeter malfunction.

Once the malfunction was discovered, we calculated the entire event's emissions using the maximum flow rate to conservatively overestimate the daily NOx and CO levels to ensure we were compliant with the daily permitted levels. No permit limits were exceeded using the estimate. The unit was shut down on December 9<sup>th</sup> and the flow meter was repaired on December 12<sup>th</sup>. It was reported there was debris in the meter, which caused the inaccurate readings.

There were two root causes for the late reporting:



### **No Alarm on Flow Meter**

The flow meter has an 'alert' in the DCS control system, rather than an alarm. The alert changes the color of the flow meter reading from green to yellow when it drops below 4,000 pounds per hour. The typical flow is usually 5,000-6,000 pounds per hour. After the event, an alarm was created in the DCS system.

### **Low Emission Generation during Recycle Run**

The unit typically generates 6-8 pounds of NO<sub>x</sub> and 1-2 pounds of CO per day with a fresh product. Prior to the flow meter malfunction, the recycle run generated less than a 0.33 pounds of NO<sub>x</sub> and 0.0001 pounds of CO per day. This made the effects of the slowing and inaccurate flow meter hard to distinguish as the operators observed the NO<sub>x</sub>/CO abatement system operation. The flow meter's operation is now monitored in the daily CEMs review by HSSE.

We were issued an NOV (A60858) by the District on December 9, 2022, for not reporting the inoperable monitor by the following business day.

### **Certification of Compliance Monitoring**

I certify under penalty of law this document and all attachments were prepared under my direction or supervision, in accordance with a system designed to assure qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief, true, accurate and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any questions regarding these matters, please contact Jeff Luengo at (925) 313-9862.

Thank You,

A handwritten signature in blue ink that reads "Ricky Mincey".

Ricky Mincey  
Plant Manager  
Shell Catalysts & Technologies

File: AR-T5R-40.62

The following tables list the compliance status for each source. An “X” in the Yes column means that unit is in compliance. An asterisk placed by “X\*” or an “I\*” (intermittent) indicates there was an episode report and a break of the permit conditions during the time frame of the report.

<b>Table VII – A</b>									
<b>Applicable Limits and Compliance Monitoring Requirements</b>									
<b>S1 – X1 MULLER, S12 – BULK BAG UNLOADER STATION, S13 – BBU CONVEYOR FEEDER, S14 – BBU DRAG CONVEYOR, S15 – BBU MULLER FEEDER SURGE BIN, S16 – BBU MULLER FEEDER; ABATED BY: A4 – X1 MULLER FILTER RECEIVER</b>									
Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-301	N		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #8444, part 3	C	Bag failure warning device	X	
Opacity	SIP 6-301	Y		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #8444, part 3	C	Bag failure warning device	X	
	BAAQMD condition #8444, part 1	Y		Ringelmann 0.5	BAAQMD condition #8444, part 3	C	Bag failure warning device	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	BAAQMD condition #8444, part 3	C	Bag failure warning device	X	
	BAAQMD 6-311	N		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr		N	None	X	
FP	SIP 6-310	Y		0.15 gr/dscf	BAAQMD condition #8444, part 3	C	Bag failure warning device	X	
FP	SIP 6-311	Y		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr		N	None	X	
FP	BAAQMD condition #8444, part 2	Y		0.006 gr/dscf	BAAQMD condition #8444, part 3	C	Bag failure warning device	X	
Air flow rate	BAAQMD condition #8444, part 2	Y		1,116 scfm	None	N	None	X	

**Table VII - B**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S2 - X1 DRYER, ABATED BY A6 – X1 DRYER BAGHOUSE**  
**S407 – X2 DRYER, ABATED BY A57 – X2 DRYER BAGHOUSE**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301	N		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #13099, part 2	C	Bag failure warning device	X	
Opacity	SIP 6-301	Y		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #13099, part 2	C	Bag failure warning device	X	
FP	BAAQMD condition #13099, part 1	Y		Ringelmann 0.5	BAAQMD condition #13099, part 2	C	Bag failure warning device	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	BAAQMD condition #13099, part 2	C	Bag failure warning device	X	
FP	BAAQMD 6-1-311	N		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr		N	NONE	X	
FP	SIP 6-310	Y		0.15 gr/dscf	BAAQMD condition #13099, part 2	C	Bag failure warning device	X	
FP	SIP 6-311	Y		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr		N	NONE	X	
FP	BAAQMD condition #13099, part 3	Y		0.006 gr/dscf	BAAQMD condition #13099, part 2	C	Bag failure warning device	X	
Air flow rate	BAAQMD condition #13099, part 3	Y		8,000 scfm	NONE	N	NONE	X	
SO2	BAAQMD 9-1-301	N		GLC of 0.5 ppm for 3 min. or 0.25 ppm for 60 min. or 0.05 ppm for 24 hrs	NONE	N	NONE	X	
SO2	BAAQMD 9-1-311.2	N		50 lbs/hr	NONE	N	NONE	X	
SO2	SIP 9-1-301	Y		GLC of 0.5 ppm for 3 min. or 0.25 ppm for 60 min. or 0.05 ppm for 24 hours	NONE	N	NONE	X	
SO2	SIP 9-1-311.2	Y		50 lbs/hr	NONE	N	NONE	X	

**Table VII - C**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S3 - X1 DRIED PRODUCT ELEVATOR**  
**S4 - X1 DRIED PRODUCT SCREENER**  
**S5 - X1 LONG BREAKER**  
**S6 - X1 KILN FEED CONVEYOR SYSTEM**  
**S8 - X1 CALCINED PRODUCT ELEVATOR**  
**S9 - X1 CALCINED PRODUCT SCREENER**  
**S10 - X1 CALCINED PRODUCT PACKAGING**  
**ABATED BY A3 - X1 NUISANCE DUST BAGHOUSE**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301	N		Ringelmann 1.0 for < 3 minutes/hr	NONE	N	NONE	X	
Opacity	SIP 6-301	Y		Ringelmann 1.0 for < 3 minutes/hr	NONE	N	NONE	X	
Opacity	BAAQMD Condition #16736, Part 5	Y		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD Condition #16736, Part 6	C	Bag failure warning device	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	NONE	N	NONE	X	
FP	BAAQMD 6-1-311	N		4.10 <sup>P0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	SIP 6-310	Y		0.15 gr/dscf	NONE	N	NONE	X	
FP	SIP 6-311	Y		4.10 <sup>P0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	BAAQMD condition #16736, part 2	Y		0.003 gr/dscf	BAAQMD condition #16736, part 4	P/A	Source Test	X	
Through-put	BAAQMD condition #16736, part 1	Y		8,000 tons/yr	BAAQMD condition #16736, part 8	P/D	Record keeping	X	
Nickel content	BAAQMD condition #16736, part 3a	Y		7% daily average, 6% monthly average, 6% 12-month average	BAAQMD condition #16736, part 8	P/D,M,A	Record keeping	X	
Air flow rate	BAAQMD condition #16736, part 7	Y		9,372 acfm for A-3	None	N	None	X	

**Table VII - D**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S7 - X1 KILN; ABATED BY A2 – X1 KILN BAGHOUSE;**  
**S413 – X2 KILN; ABATED BY A43 – X2 KILN BAGHOUSE;**  
**BOTH ABATED BY A58 – X1/X2 KILN SCR**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301	N		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #13100, part 2	C	Bag failure warning device	X	
Opacity	SIP 6-301	Y		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #13100, part 2	C	Bag failure warning device	X	
FP	BAAQMD 6-1-310	Y		0.15 gr/dscf	BAAQMD condition #13100, part 2	C	Bag failure warning device	X	
	BAAQMD 6-1-311	Y		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	SIP 6-310	Y		0.15 gr/dscf	BAAQMD condition #13100, part 2	C	Bag failure warning device	X	
	SIP 6-311	Y		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	BAAQMD condition #13100, part 3	Y		0.006 gr/dscf	BAAQMD condition #13100, part 2	C	Bag failure warning device	X	
	BAAQMD Condition #13100, Part 3	Y		0.006 gr/dscf for A-2, A-43	BAAQMD Condition #13100, Part 7	N	Source test	X	
Air flow rate	BAAQMD condition #13100, part 3	Y		8,000 scfm combined for A-2 and A-43	NONE	N	NONE	X	
Throughput	BAAQMD Condition #16736, Part 1	Y		8,000 tons/yr for S-7	BAAQMD Condition #16736, Part 8	P/D	Recordkeeping	X	
Throughput	BAAQMD Condition #16736, Part 1	Y		9,000 tons/yr for S-413	BAAQMD Condition #16736, Part 8	P/D	Recordkeeping	X	
Nickel content	BAAQMD Condition #16736, Part 3a	Y		7% daily average, 6% monthly average, 6% 12-month average for S-7	BAAQMD Condition #16736, Part 8	P/D,M,A	Recordkeeping	X	
Nickel content	BAAQMD Condition #16736, Part 3b	Y		7% daily average, 6% monthly average, 6% 12-month average for S-413	BAAQMD Condition #16736, Part 8	P/D,M,A	Recordkeeping	X	
NOx	BAAQMD condition #13100, part 6	Y		58 lb/day or 21,000 lb/yr	BAAQMD condition #13100, part 8	C	CEM	X	
Natural gas	BAAQMD condition #13100, part 4	Y		700,000 therms at S7	BAAQMD condition #13100, part 9 & 10	C	Fuel meter, record keeping	X	

**Table VII - D**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S7 - X1 KILN; ABATED BY A2 – X1 KILN BAGHOUSE;**  
**S413 – X2 KILN; ABATED BY A43 – X2 KILN BAGHOUSE;**  
**BOTH ABATED BY A58 – X1/X2 KILN SCR**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
	BAAQMD condition #13100, part 5	Y		700,000 therms at S413	BAAQMD condition #13100, part 9 & 10	C	Fuel meter, record keeping	X	
SO2	BAAQMD 9-1-301	N		GLC of 0.5 ppm for 3 min. or 0.25 ppm for 60 min. or 0.05 ppm for 24 hours	NONE	N	NONE	X	
SO2	SIP 9-1-301	Y		GLC of 0.5 ppm for 3 min. or 0.25 ppm for 60 min. or 0.05 ppm for 24 hours	NONE	N	NONE	X	
	SIP 9-1-311.2	Y		50 lbs/hr	NONE	N	NONE	X	
	BAAQMD 9-1-311.2	N		50 lbs/hr	NONE	N	NONE	X	

**Table VII - E**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S11 - X1 CALCINED PRODUCT CONVEYOR**  
**ABATED BY A3 – X1 NUISANCE DUST BAGHOUSE**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-301, Condition # 16736, part 5	Y		Ringelmann 1.0 for < 3 minutes/hr	None	N	None	X	
Opacity	BAAQMD 6-1-301, Condition # 16736, part 5	N		Ringelmann 1.0 for < 3 minutes/hr	None	N	None	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	None	N	None	X	
	BAAQMD Condition #16736, Part 2	Y		0.003 gr/dscf	BAAQMD Condition #16736, Part 4	P/A	Source test	X	
	BAAQMD 6-1-311	N		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	None	N	None	X	
FP	SIP 6-310	Y		0.15 gr/dscf	None	N	None	X	
	SIP 6-311	Y		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	None	N	None	X	
Through-put	BAAQMD condition #16736, part 1	Y		8,000 tons/yr	BAAQMD condition #16736, part 8	P/D	Record keeping	X	
Air flow rate	BAAQMD Condition #16736, Part 7	Y		9,372 acfm for A-3	None	N	None	X	



**Table VII - F**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S19 – X1 RECYCLE STATION**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301	N		Ringelmann 1.0 for < 3 minutes/hr	None	N	None	X	
Opacity	SIP 6-301	Y		Ringelmann 1.0 for < 3 minutes/hr	None	N	None	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	None	N	None	X	
	BAAQMD 6-311	N		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	None	N	None	X	
FP	SIP 6-310	Y		0.15 gr/dscf	None	N	None	X	
	SIP 6-311	Y		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	None	N	None	X	
Through-put	BAAQMD condition #16736, part 1	Y		3,667 tons/yr	BAAQMD condition #16736, part 6	P/D	Record keeping	X	

**Table VII – G**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S104 - H1 BLENDING TANK T-1**  
**S105 – H1 BLENDING TANK T-2**  
**S106 – H1 BLENDING TANK T-3**  
**ABATED BY A49 – H1 BLENDING TANKS BAGHOUSE**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301, Condition #9984, part 1	N		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #9984, part 3	C	Bag failure warning device	X	
Opacity	SIP 6-301, Condition #9984, part 1	Y		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #9984, part 3	C	Bag failure warning device	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	BAAQMD condition #9984, part 3	C	Bag failure warning device	X	
	BAAQMD 6-1-311	N		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	None	N	None	X	
FP	SIP 6-310	Y		0.15 gr/dscf	BAAQMD condition #9984, part 3	C	Bag failure warning device	X	
	SIP 6-311	Y		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	None	N	None	X	
	BAAQMD condition #9984, part 2	Y		0.006 gr/dscf	BAAQMD condition #9984, part 3	C	Bag failure warning device	X	
Air flow rate	BAAQMD condition #9984, part 2	Y		3,500 scfm	None	N	None	X	

**Table VII - H**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S303 – ALUMINA RECEIVING FLUIDSTAT STATION, ABATED BY A32 – ALUMINA RECEIVING DUST COLLECTOR;**  
**AND BY A320 – ALUMINA RECEIVING STATION BLOWPOT DRY IN-LINE FILTER;**  
**S309 – ALUMINA RECIRCULATION FLUIDSTAT STATION,**  
**ABATED BY A38 – ALUMINA RECIRCULATION BLOWPOT BAGHOUSE;**  
**AND BY A380 – ALUMINA RECIRCULATION STATION BLOWPOT DRY IN-LINE FILTER;**  
**S310 – ALUMINA MEASURING FLUIDSTAT STATION,**  
**ABATED BY A39 – ALUMINA MEASURING BLOWPOT BAGHOUSE;**  
**AND BY A390 – ALUMINA MEASURING STATION BLOWPOT DRY IN-LINE FILTER**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301	N		Ringelmann 1.0 for < 3 minutes/hr	None	N	None	X	
Opacity	SIP 6-301	Y		Ringelmann 1.0 for < 3 minutes/hr	None	N	None	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	None	N	None	X	
	BAAQMD 6-1-311	N		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	None	N	None	X	
FP	SIP 6-310	Y		0.15 gr/dscf	None	N	None	X	
	SIP 6-311	Y		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	None	N	None	X	

**Table VII - I**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S304 – ALUMINA SILO 1, ABATED BY A33 – SILO 1 VENT FILTER;**  
**S305 – ALUMINA SILO 2, ABATED BY A34 – SILO 2 VENT FILTER;**  
**S306 – ALUMINA SILO 3, ABATED BY A35 – SILO 3 VENT FILTER;**  
**S307 – ALUMINA SILO 4, ABATED BY A36 – SILO 4 VENT FILTER;**  
**S308 – ALUMINA SILO 5, ABATED BY A37 – SILO 5 VENT FILTER**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301	N		Ringelmann 1.0 for < 3 minutes/hr	NONE	N	NONE	X	
Opacity	SIP 6-301	Y		Ringelmann 1.0 for < 3 minutes/hr	NONE	N	NONE	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	NONE	N	NONE	X	
	BAAQMD 6-1-311	N		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	SIP 6-310	Y		0.15 gr/dscf	NONE	N	NONE	X	
	SIP 6-311	Y		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	

**Table VII - J**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S311 - ALUMINA BULK BAG UNLOADER**  
**S312 – ALUMINA REPACKAGING STATION**  
**S313 – FINES GRINDER FEED HOPPER SYSTEM**  
**S323 – FINES GRINDER FEED HOPPER SYSTEM (SECONDARY)**  
**ABATED BY A40 – REPACKAGING BAGHOUSE**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301, condition #3344, part 1	N		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #3344, part 5	C	Bag failure warning device	X	
Opacity	SIP 6-301, condition #3344, part 1	Y		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #3344, part 5	C	Bag failure warning device	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	BAAQMD Condition #3344, part 5	C	Bag failure warning device	X	
	BAAQMD 6-1-311	N		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	SIP 6-310	Y		0.15 gr/dscf	BAAQMD Condition #3344, part 5	C	Bag failure warning device	X	
	SIP 6-311	Y		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
	BAAQMD condition #3344, part 6	Y		0.005 gr/dscf	BAAQMD condition. #3344, part 5	C	Bag failure warning device	X	
Nickel content	BAAQMD condition #3344, part 7	Y		7% by weight per hour at S313 and S323	BAAQMD condition #3344, part 8	P/H	Record keeping	X	
Throughput (bulk)	BAAQMD condition #3344, part 2	Y		12,480 tons/yr for S311 and S312	BAAQMD condition #3344, part 8	P/D	Record keeping	X	
Throughput (catalyst)	BAAQMD condition #3344, part 3	Y		4,380 tons/yr for S313/323	BAAQMD condition #3344, part 8	P/D	Record keeping	X	
Air flow rate	BAAQMD condition #3344, part 6	Y		2,900 scfm	NONE	N	NONE	X	

**Table VII – K**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S314 – REGROUND FINES STORAGE SILO TK-70112,**  
**ABATED BY A44 – REGROUND FINES SILO DUST COLLECTOR;**  
**S315 – REGROUND FINES STORAGE SILO TK-70113,**  
**ABATED BY A45 – REGROUND FINES SILO DUST COLLECTOR;**  
**S316 – REGROUND FINES STORAGE SILO TK-70114,**  
**ABATED BY A46 – REGROUND FINES SILO DUST COLLECTOR;**  
**S317 – REGROUND FINES STORAGE SILO TK-70115,**  
**ABATED BY A47 – REGROUND FINES SILO DUST COLLECTOR;**  
**S318 – FINES WEIGH HOPPER BLOW POT, ABATED BY A4, A40, A48, OR A601;**  
**S319 – FINES BAGOUT STATION NO.1 & NO.2, ABATED BY A44 OR A47;**  
**S320 – FINES GRINDER, ABATED BY A44, A45, A-46, OR A47;**  
**S322 – FINES TANKER TRUCK DELIVERY SYSTEM, ABATED BY A44, A45, A-46, OR A47**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301	N		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #8468, part 5	C	Bag failure warning device	X	
Opacity	SIP 6-301	Y		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #8468, part 5	C	Bag failure warning device	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	BAAQMD condition #8468, part 5	C	Bag failure warning device	X	
	BAAQMD 6-1-311	N		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	SIP 6-310	Y		0.15 gr/dscf	BAAQMD condition #8468, part 5	C	Bag failure warning device	X	
	SIP 6-311	Y		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
	BAAQMD condition #8468, part 6	Y		0.005 gr/dscf	BAAQMD condition. #8468, part 5	C	Bag failure warning device	X	
Nickel content	BAAQMD condition #8468, part 7	Y		7% by weight per hour	BAAQMD condition #3344, part 8	P/H	Record keeping	X	
Through-put (catalyst)	BAAQMD condition #8468, part 2	Y		4,380 tons/yr for each source	BAAQMD condition #8468, part 8	P/D	Record keeping	X	
Air flow rate	BAAQMD condition #8468, part 6	Y		3,000 scfm from each source	NONE	N	NONE	X	

<b>Table VII - L</b> <b>Applicable Limits and Compliance Monitoring Requirements</b> <b>S321 - ALUMINA STORAGE SILO; ABATED BY A50 – ALUMINA SILO 6 VENT FILTER</b>									
Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301	N		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD Condition #13092, part 3	C	Bag failure warning device	X	
Opacity	SIP 6-301	Y		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD Condition #13092, part 3	C	Bag failure warning device	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	BAAQMD condition #13092, part 3	C	Bag failure warning device	X	
	BAAQMD 6-1-311	N		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	SIP 6-310	Y		0.15 gr/dscf	BAAQMD condition #13092, part 3	C	Bag failure warning device	X	
	SIP 6-311	Y		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
	BAAQMD condition #13092, part 4	Y		0.005 gr/dscf	BAAQMD condition. #13092, part 3	C	Bag failure warning device	X	
Through-put (Alumina)	BAAQMD condition #13092, part 2	Y		9,636 tons/yr	BAAQMD condition #13092, part 5	P/D	Record keeping	X	
Air flow rate	BAAQMD condition #13092, part 4	Y		150 scfm	NONE	N	NONE	X	

<b>Table VII - M</b> <b>Applicable Limits and Compliance Monitoring Requirements</b> <b>S401 - X2 MULLER; ABATED BY A48 – X2 MULLER FILTER RECEIVER</b>									
Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301	N		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #8445, part 3	C	Bag failure warning device	X	
Opacity	SIP 6-301	Y		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #8445, part 3	C	Bag failure warning device	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	BAAQMD condition #8445, part 3	C	Bag failure warning device	X	
	BAAQMD 6-1-311	N		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	SIP 6-310	Y		0.15 gr/dscf	BAAQMD condition #8445, part 3	C	Bag failure warning device	X	
	SIP 6-311	Y		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
	BAAQMD condition #8445, part 2	Y		0.006 gr/dscf	BAAQMD condition. #8445, part 3	C	Bag failure warning device	X	
Air flow rate	BAAQMD condition #8445, part 2	Y		1,116 scfm	NONE	N	NONE	X	

**Table VII - N**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S408 - X2 DRIED PRODUCT ELEVATOR**  
**S409 – X2 DRIED PRODUCT SCREENER**  
**S410 – X2 LONG BREAKER**  
**S412 – X2 KILN FEED CONVEYOR**  
**S414 – X2 CALCINED PRODUCT ELEVATOR**  
**S415 – X2 CALCINED PRODUCT SCREENER**  
**S416 – X2 CALCINED PRODUCT PACKAGING**  
**S417 – X2 CALCINED PRODUCT CONVEYOR**  
**S418 – X2 RECYCLE STATION**  
**ABATED BY A42 – X2 NUISANCE DUST BAGHOUSE**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301	N		Ringelmann 1.0 for < 3 minutes/hr	NONE	N	NONE	X	
Opacity	SIP 6-301	Y		Ringelmann 1.0 for < 3 minutes/hr	NONE	N	NONE	X	
	BAAQMD Condition #16736, Part 5	Y		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD Condition #16736, Part 6	C	Bag failure warning device	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	NONE	N	NONE	X	
	BAAQMD condition #16736, part 2	Y		0.003 gr/dscf	BAAQMD condition #16736, part 4	P/A	Source Test	X	
FP	BAAQMD 6-1-311	N		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	SIP 6-310	Y		0.15 gr/dscf	NONE	N	NONE	X	
FP	SIP6-311	Y		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
Throughput	BAAQMD condition #16736, part 1	Y		9,000 tons/yr at each source	BAAQMD condition #16736, part 8	P/D	Record keeping	X	
Nickel content	BAAQMD condition #16736, part 3b	Y		7% daily average, 6% monthly average, 6% 12-month average for S-7	BAAQMD condition #16736, part 8	P/D	Record keeping	X	
Air flow rate	BAAQMD condition #16736, part 7	Y		8,600 scfm for A-42	None	N	None	X	

<b>Table VII - O</b> <b>Applicable Limits and Compliance Monitoring Requirements</b> <b>S515 – H2 SOLID ADDITIVE HOPPER A,</b> <b>ABATED BY A52 – H2 SOLID ADDITIVE HOPPER A FILTER RECEIVER;</b> <b>S516 – H2 SOLID ADDITIVE HOPPER B,</b> <b>ABATED BY A53 – H2 SOLID ADDITIVE HOPPER B FILTER RECEIVER;S517 – H2</b> <b>PRODUCT RECYCLE SYSTEM, S518 – H2 CALCINED FEED SYSTEM,</b> <b>S519 – H2 SPHERICAL HOPPER SYSTEM, S520 – H2 CALCINED FEED BAGOUT STATION,</b> <b>S517, S518, S519, AND S520 ABATED BY A55 – H2 NUISANCE BAGHOUSE</b>									
Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301, condition #16736, part 5	N		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD Condition #16736, Part 6	C	Bag failure warning device	X	
Opacity	SIP 6-301, condition #16736, part 5	Y		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD Condition #16736, Part 6	C	Bag failure warning device	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	NONE	N	NONE	X	
	BAAQMD 6-1-311	N		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	SIP 6-310	Y		0.15 gr/dscf	NONE	N	NONE	X	
	SIP 6-311	Y		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
	BAAQMD condition #16736, part 2	Y		0.003 gr/dscf for A-55 0.006 gr/dscf for A-52 & A-53	BAAQMD condition #16736, part 4	P/A	Source test	X	
Through-put	BAAQMD condition #16736, part 1	Y		S515: 1,700 tons/yr S516: 3,300 tons/yr S517: 12,000 tons/yr S518: 12,000 tons/yr S519: 12,000 tons/yr S520: 12,000 tons/yr	BAAQMD condition #16736, part 8	P/D	Record keeping	X	
Nickel content	BAAQMD condition #16736, part 3c,d,e	Y		15% daily average, 15% monthly average, 7% 12-month average for S515 & S516; 8% daily average, 7% monthly average, 7% 12-month average for S517, S518, S519, S520	BAAQMD condition #16736, part 8	P/D	Record keeping	X	
Air flow rate	BAAQMD condition #16736, part 7	Y		1,200 acfm for A52 & A53; 12,000 acfm for A55	None	N	None	X	

<b>Table VII – P</b> <b>Applicable Limits and Compliance Monitoring Requirements</b> <b>S502 - NICKEL SOLUTION TANK</b>									
Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Ni	BAAQMD Regulation 2-1, Table 2-1-316	Y		0.73 lb/yr	BAAQMD 2-1-316.1	P/Annual	Record keeping	X	

**Table VII – Q**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S504 - H2 BLENDING TANK T-1**  
**S505 – H2 BLENDING TANK T-2**  
**S506 – H2 BLENDING TANK T-3**  
**S507 – H2 LIQUID/SOLID BLENDER**  
**S510 – H2 KILN**  
**ABATED BY A54 – H2 KILN BAGHOUSE AND BY A56 – H2 AFTERBURNER**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301	N		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #9315, part 5	C	Bag failure warning device	X	
Opacity	SIP 6-301	Y		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #9315, part 5	C	Bag failure warning device	X	
FP	BAAQMD 6-1-310	Y		0.15 gr/dscf	BAAQMD condition #9315, part 5	C	Bag failure warning device	X	
	BAAQMD 6-1-311	N		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	SIP 6-310	Y		0.15 gr/dscf	BAAQMD condition #9315, part 5	C	Bag failure warning device	X	
	SIP 6-311	Y		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
	BAAQMD condition #9315, part 4	Y		0.006 gr/dscf	BAAQMD condition #9315, part 5	C	Bag failure warning device	X	
Air flow rate	BAAQMD condition #9315, part 4	Y		7,500 scfm	NONE	N	NONE	X	
NOx	BAAQMD condition #9315, part 10	Y		120 lb/day	BAAQMD condition #9315, part 13 & 14	P/A and D	Source test (A), Record keeping (D)	X	
NH3	BAAQMD condition #9315, part 10	Y		2,200 lb/day, and 200 lb/day (when A-56 in operation)	BAAQMD condition #9315, part 13	P/A and D	Source test (A), Record keeping (D)	X	
CO	BAAQMD condition #9315, part 8	Y		400 ppmv dry @ 3% Oxygen	BAAQMD condition #9315, part 13	P/A	Source test	X	
Temperature (A-56)	BAAQMD condition #9315, part 9.1 & 9.2	Y		≥1450 degree F, except as allowed by Condition # 9315 parts 9.1 & 9.2	BAAQMD condition #9315, part 7	C	Temperature Monitor	X	
Residence time (A-56)	BAAQMD condition #9315, part 9	Y		0.4 second	BAAQMD condition #9315, part 13	P/A	Source test	X	
Nickel content	BAAQMD condition #9315, part 1	Y		10% 12-month average		P/D	Record keeping	X	



**Table VII - R**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S509 – H2 KILN FEED CONVEYOR**  
**S511 – H2 PRODUCT CONVEYOR**  
**S512 – H2 PRODUCT SCREENER**  
**S513 – H2 PRODUCT PACKAGING**  
**ABATED BY A55 – H2 NUISANCE BAGHOUSE**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301	N		Ringelmann 1.0 for < 3 minutes/hr	None	N	None	X	
Opacity	SIP 6-301	Y		Ringelmann 1.0 for < 3 minutes/hr	None	N	None	X	
	BAAQMD condition 16736, part 5	Y		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition 16736, part 6	C	Bag failure warning device	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	None	N	None	X	
	BAAQMD condition 16736, part 2	Y		0.003 gr/dscf for A-55	BAAQMD condition #16736, part 4	P/A	Source Test	X	
	BAAQMD 6-1-311	N		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	None	N	None	X	
FP	SIP 6-310	Y		0.15 gr/dscf	None	N	None	X	
	SIP 6-311	Y		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	None	N	None	X	
Throughput	BAAQMD condition 16736, part 1	Y		12,000 tons/yr	BAAQMD condition #16736, part 8	P/D	Record keeping	X	
Nickel content	BAAQMD condition 16736, part 3e	Y		8% daily average, 7% monthly average, 7% 12-month average	BAAQMD condition #16736, part 8	P/D,M,A	Record keeping	X	
Air flow rate	BAAQMD condition 16736, part 7	Y		11,000 acfm for A-55	None	N	None	X	

**Table VII – S**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S600 - X3 DRIED EXTRUDER, SCREENER, CONVEYOR;**  
**ABATED BY A607 – X3 DUST COLLECTOR,**  
**FOLLOWED BY A603 – X3 DRYER BAGHOUSE**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301, condition #13093, part 2	N		Ringelmann 1.0 for < 3 minutes/hr	None	N	None	X	
Opacity	BAAQMD 6-301, condition #13093, part 2	Y		Ringelmann 1.0 for < 3 minutes/hr	None	N	None	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	BAAQMD condition #15672, part 2	C	Bag failure warning device	X	
	BAAQMD 6-1-311	N		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	None	N	None	X	
FP	SIP 6-310	Y		0.15 gr/dscf	BAAQMD condition #15672, part 2	C	Bag failure warning device	X	
	SIP 6-311	Y		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	None	N	None	X	
	BAAQMD condition #13093, part 3	Y		0.005 gr/dscf	BAAQMD condition #13097, part 4	C	Bag failure warning device	X	
Air flow rate	BAAQMD condition #13093, part 3	Y		12,000 scfm	None	N	None	X	
Through-put	BAAQMD condition #13093, part 4	Y		36 tons/day	BAAQMD condition #13093, part 5	P/D	Record keeping	X	
Nickel & Nickel compounds content	BAAQMD condition #13093, part 1	Y		3.0% by weight averaged over any consecutive 12-month period	BAAQMD condition #13093, part 5	P/D	Record keeping	X	

**Table VII - T**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S601 - X3 FINES SURGE HOPPER;**  
**ABATED BY A601 – X3 FINES SURGE HOPPER BAGHOUSE**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301, condition #13094, part 1	N		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD Condition #13094, part 3	C	Bag failure warning device	X	
Opacity	SIP 6-301, condition #13094, part 1	Y		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD Condition #13094, part 3	C	Bag failure warning device	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	BAAQMD Condition #13094, part 3	C	Bag failure warning device	X	
	BAAQMD 6-1-311	N		$4.10P^{0.67}$ lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	SIP 6-310	Y		0.15 gr/dscf	BAAQMD Condition #13094, part 3	C	Bag failure warning device	X	
	SIP 6-311	Y		$4.10P^{0.67}$ lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
	BAAQMD condition #13094, part 4	Y		0.006 gr/dscf	BAAQMD Condition #13094, part 3	C	Bag failure warning device	X	
Air flow rate	BAAQMD condition #13094, part 4	Y		100 scfm	NONE	N	NONE	X	
Through-put (catalyst)	BAAQMD condition #13094, part 2	Y		1,400 tons/yr	BAAQMD condition #13094, part 5	P/D	Record keeping	X	

**Table VII - U**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S602 - X3 ALUMINA SURGE HOPPER;**  
**ABATED BY A602 - X3 ALUMINA SURGE HOPPER BAGHOUSE**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301, condition #13095, part 1	N		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD Condition #13095, part 3	C	Bag failure warning device	X	
Opacity	SIP 6-301, condition #13095, part 1	Y		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD Condition #13095, part 3	C	Bag failure warning device	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	BAAQMD Condition #13095, part 3	C	Bag failure warning device	X	
	BAAQMD 6-1-311	N		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	SIP 6-310	Y		0.15 gr/dscf	BAAQMD Condition #13095, part 3	C	Bag failure warning device	X	
	SIP 6-311	Y		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
	BAAQMD condition #13095, part 4	Y		0.006 gr/dscf	BAAQMD Condition #13095, part 3	C	Bag failure warning device	X	
Air flow rate	BAAQMD condition #13095, part 4	Y		200 scfm	BAAQMD condition #13095, part 4	N	NONE	X	
Through-put (Alumina)	BAAQMD condition #13095, part 2	Y		9,636 tons/yr	BAAQMD condition #13095, part 5	P/D	Record keeping	X	

**Table VII - V  
Applicable Limits and Compliance Monitoring Requirements  
S603 - X3 EXTRUDER**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301, condition #13096, part 1	N		Ringelmann 1.0 for < 3 minutes/hr	NONE	N	NONE	X	
Opacity	SIP 6-301, condition #13096, part 1	Y		Ringelmann 1.0 for < 3 minutes/hr	NONE	N	NONE	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	NONE	N	NONE	X	
	BAAQMD 6-1-311	N		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	SIP 6-310	Y		0.15 gr/dscf	NONE	N	NONE	X	
	SIP 6-311	Y		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
NH3	BAAQMD #15672, part 5	Y		490 lb/day or 48,000 lb/yr	BAAQMD condition #15672, part 11	P/A	Source test	X	
Through-put	BAAQMD condition #13096, part 2	Y		31,665 tons/yr	BAAQMD condition #13096, part 3	P/D	Record keeping	X	
Nickel content	BAAQMD condition #15672, part 10	Y		3.0% by weight per year	BAAQMD condition #15672, part 14	P/M	Record keeping	X	

**Table VII - W**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S604 - X3 DRYER; ABATED BY A603 X3 DRYER BAGHOUSE**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301, condition #13097, part 1	N		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD Condition #13097, part 4	C	Pressure drop monitoring device	X	
Opacity	SIP 6-301, condition #13097, part 1	Y		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD Condition #13097, part 4	C	Pressure drop monitoring device	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	BAAQMD Condition #13097, part 4	C	Pressure drop monitoring device	X	
	BAAQMD 6-1-311	N		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	SIP 6-310	Y		0.15 gr/dscf	BAAQMD Condition #13097, part 4	C	Pressure drop monitoring device	X	
	SIP 6-311	Y		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
	BAAQMD condition #13097, part 5	Y		0.005 gr/dscf	BAAQMD Condition #13097, part 4	C	Pressure drop monitoring device	X	
NH3	BAAQMD #15672, part 5	Y		490 lb/day or 48,000 lb/yr	BAAQMD condition #15672, part 11	P/A	Source test	X	
Nickel content	BAAQMD condition #15672, part 10	Y		3.0% by weight per consecutive 12-month averaging period	BAAQMD condition #15672, part 14	P/M	Record keeping	X	
Air flow rate	BAAQMD condition #13097, part 4	Y		12,000 scfm	NONE	N	NONE	X	
Natural gas	BAAQMD condition #13097, part 6	Y		534,360 therms/yr	BAAQMD condition #13097, part 7 and 8	C/M	Fuel meter and Record keeping	X	

**Table VII - X**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S606 - X3 CALCINER, ABATED BY A604 X3 CALCINER BAGHOUSE,**  
**A605 – X3 CALCINER SCR, AND A606 – X3 CALCINER CO CATALYST**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
Opacity	BAAQMD 6-1-301, condition #15672, part 1	N		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #15672, part 2	C	Bag failure warning device	X	
Opacity	SIP 6-301, condition #15672, part 1	Y		Ringelmann 1.0 for < 3 minutes/hr	BAAQMD condition #15672, part 2	C	Bag failure warning device	X	
FP	BAAQMD 6-1-310	N		0.15 gr/dscf	BAAQMD condition #15672, part 2	C	Bag failure warning device	X	
	BAAQMD 6-1-311	N		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
FP	SIP 6-310	Y		0.15 gr/dscf	BAAQMD condition #15672, part 2	C	Bag failure warning device	X	
	SIP 6-311	Y		4.10P <sup>0.67</sup> lb/hr, where P is process weight, ton/hr	NONE	N	NONE	X	
	BAAQMD condition #15672, part 3	Y		0.005 gr/dscf	BAAQMD condition #15672, part 2	C	Bag failure warning device	X	
NOx	BAAQMD condition #15672, part 6	Y		51 lb/day or 18,500 lb/yr	BAAQMD condition #15672, part 12	C	CEM	I*	
CO	BAAQMD condition #15672, part 9	Y		19,524 lb/yr	BAAQMD condition #15672, part 12	C	CEM	I*	
	BAAQMD condition #15672, part 8	Y		40 ppmv	BAAQMD condition #15672, part 12	C	CEM	I*	
CO abatement efficiency	BAAQMD condition #15672, part 8	Y		90% mass basis	BAAQMD condition #15672, part 12	C	CEM	I*	
NH3	BAAQMD #15672, part 5	Y		490 lb/day or 48,000 lb/yr	BAAQMD condition #15672, part 11	P/A	Source test	X	
SO2	BAAQMD 9-1-301	N		GLC of 0.5 ppm for 3 min. or 0.25 ppm for 60 min. or 0.05 ppm for 24 hours	NONE	N	NONE	X	
	BAAQMD 9-1-311.2	N		50 lbs/hr	NONE	N	NONE	X	
SO2	SIP 9-1-301	Y		GLC of 0.5 ppm for 3 min. or 0.25 ppm for 60 min. or 0.05 ppm for 24 hours	NONE	N	NONE	X	
	SIP 9-1-311.2	Y		50 lbs/hr	NONE	N	NONE	X	
Nickel content	BAAQMD condition #15672, part 10	Y		3.0% by weight per consecutive 12-month period	BAAQMD condition #15672, part 14	P/M	Record keeping	X	
Air flow rate	BAAQMD condition #15672, part 3	Y		1,736 scfm	NONE	N	NONE	X	
Natural gas	BAAQMD condition #15672, part 4	Y		700,000 therms	BAAQMD condition #15672, part 13 & 14	P/C/M	Fuel meter, Record keeping	X	

I\* - Late reporting of Inoperable CEMs Monitor (flow meter) in November/December 2022. Described above.

**Table VII – Y**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S612 – EMERGENCY STANDBY DIESEL FIRE PUMP ENGINE**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
SO2	BAAQMD 9-1-301 BAAQMD	Y		GLC <sup>1</sup> of 0.5 ppm for 3 min or 0.25 ppm for 60 min or 0.05 ppm for 24 hours	None	P/E	Fuel certification by vendor	X	
	BAAQMD 9-1-304	Y		Sulfur content of fuel <0.5% by weight	None	P/E	Fuel certification by vendor	X	
Opacity	BAAQMD Regulation 6-1-303	N		≥ Ringelmann 2 for ≤ 3 min/hr		N		X	
Opacity	SIP Regulation 6-303	Y		≥ Ringelmann 2 for ≤ 3 min/hr		N		X	
FP	BAAQMD 6-1-310	N		0.15 grain/dscf		N		X	
FP	SIP Regulation 6-310	Y		0.15 grain/dscf		N		X	
Hours of operation	BAAQMD 9-8-330.1	N		Emergency use for an unlimited number of hours	BAAQMD 9-8-530	C P/E	Hour meter, recordkeeping	X	
	SIP Regulation 9-8-330.1	Y		Emergency use for an unlimited number of hours	SIP Regulation 9-8-530	C P/E	Hour meter, recordkeeping	X	
	40 CFR 63.6640 (f)(1)(i)	Y		Emergency use for an unlimited number of hours	40 CFR 63.6655	C P/E	Hour meter, recordkeeping	X	
Hours of operation	BAAQMD 9-8-330.2	N		Reliability-related activities not to exceed 100 hours in any consecutive 12-month period	BAAQMD 9-8-530	C P/E	Hour meter, recordkeeping	X	
	SIP Regulation 9-8-330.2	Y		Reliability-related activities not to exceed 100 hours in any consecutive 12-month period	SIP Regulation 9-8-530	C P/E	Hour meter, recordkeeping	X	
	40 CFR 63.6640 (f)(1)(ii)	Y		Reliability-related activities not to exceed 100 hours in any consecutive 12-month period	40 CFR 63.6655	C P/E	Hour meter, recordkeeping	X	
Hours of Operation	BAAQMD Regulation 9-8-330.3	N		<50 hours each per calendar year	BAAQMD Regulation 9-8-530	C P/E	Hour meter, recordkeeping	X	



**Table VII – Y**  
**Applicable Limits and Compliance Monitoring Requirements**  
**S612 – EMERGENCY STANDBY DIESEL FIRE PUMP ENGINE**

Type of Limit	Citation of Limit	FE Y/N	Future Effective Date	Limit	Monitoring Requirement Citation	Monitoring Frequency (P/C/N)	Monitoring Type	Compliance	
								Yes	No
				for reliability testing					
	SIP Regulation 9-8-330.3	Y		<50 hours each per calendar year for reliability testing	SIP Regulation 9-8-530	C P/E	Hour meter, recordkeeping	X	
	40 CFR 63.6640 (f)(1)(iii)	Y		<50 hours each per calendar year for reliability testing	40 CFR 63.6655	C P/E	Hour meter, recordkeeping	X	
Hours of Operation	BAAQMD Condition #22851 Part 1	Y		<= 34 hours/year for reliability-related activities	BAAQMD Condition#22851, Parts 3 and 4	C P/E	Hour meter, recordkeeping	X	
	BAAQMD Condition #22851 Part 2	Y		Emergency use for an unlimited number of hours	BAAQMD Condition #22851 Parts 3 and 4	C P/E	Hour meter, recordkeeping	X	
Oil and filter change	40 CFR 63.6603(a)	Y		Every 500 hours of operation or annually, whichever comes first.	40 CFR 63.6655(e)(3)	P/E	Recordkeeping	X	
Air cleaner inspection	40 CFR 63.6603 (a)	Y		Every 1000 hours of operation or annually, whichever comes first.	40 CFR 63.6655(e)(3)	P/E	Recordkeeping	X	
Hoses and belts inspection and replace as necessary	40 CFR 63.6603(a)	Y		Every 500 hours of operation or annually, whichever comes first.	40 CFR 63.6655(e)(3)	P/E	Recordkeeping	X	