Bay Area Air Quality Management District

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San Francisco, CA 94109
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Permit Evaluation
and
Statement of Basis
for
RENEWAL of

MAJOR FACILITY REVIEW PERMIT

for

Owens-Brockway Glass Container Inc.
Facility #A0030

Facility Address:
3600 Alameda Ave
Oakland, CA 94601

Mailing Address:
PO Box 1019
Oakland, CA 94604

Application Engineer: Greg Solomon
Site Engineer: Greg Solomon

Applications: 10138/10468

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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.

This facility received its initial Title V permit on 1/5/00. This application is for a permit renewal. Although the current permit expired on 1/1/05, it continues in force until the District takes final action on the permit renewal. The Title V Permit has been upgraded to include new standard language used in all Title V permits. The proposed permit shows all changes to the permit in strikeout/underline format.

B. Facility Description

Owens-Brockway Glass Container Inc (OB), as the name suggests, makes glass containers at its facility located in Oakland, CA. OB has three glass melting furnaces (S-10, S-11,& S-12). After the furnaces, the glass gobs go to forming machines, which make the containers. The containers are conditioned, have surface treatment, inspection, packaging and handling.

There has been no significant change in emissions since the issuance of the original Title V permit. The following is a list of applications that have been filed and processed since the issuance of the original permit:

S11, Application 9494, Furnace repair/rebuild
This application was for a repair/rebuild for S11 Glass Melting Furnace. In order to demonstrate that there would not be an increase in NOx or CO emissions the facility accepted permit conditions limiting both NOx and CO emissions. The facility also installed a NOx and O2

CEMs to demonstrate compliance with the NOx emission limit. The facility accepted a permit condition requiring an annual source test to demonstrate compliance with both NOx and CO emissions limits.
S12, Application 5183, Furnace repair/rebuild
This application was for a repair/rebuild for S12 Glass Melting Furnace. In order to demonstrate that there would not be an increase in NOx or CO emissions the facility accepted permit conditions limiting both NOx and CO emissions. The facility also installed a NOx and O2 CEMs to demonstrate compliance with the NOx emission limit. The facility accepted a permit condition requiring an annual source test to demonstrate compliance with both NOx and CO emissions limits.
S130 – S133, Application 4613, Emergency Engines
This application was submitted in order to permit these four loss of exemption emergency standby engines.
S10, Application 8523, Forehearth repair
Application 3683, Emission Reduction Credit transfer
Application 6869, Title V Significant Revision regarding monitoring based upon recommendation from District Source Test section
Application 10468, Title V Administrative Amendment to change responsible official

C. Permit Content

The legal and factual basis for the permit follows. The permit sections are described in the order presented in the permit.

The facility submitted application 10468 in order to change the responsible official and facility contact. The facility also submitted a letter dated 5/13/05 requesting another responsible official.

I. Standard Conditions

This section contains administrative requirements and conditions that apply to all facilities. If the Title IV (Acid Rain) requirements for certain fossil-fuel fired electrical generating facilities or the accidental release (40 CFR § 68) programs apply, the section will contain a standard condition pertaining to these programs. Many of these conditions derive from 40 CFR § 70.6, Permit Content, which dictates certain standard conditions that must be placed in the permit. The language that the District has developed for many of these requirements has been adopted into the BAAQMD Manual of Procedures, Volume II, Part 3, Section 4, and therefore must appear in the permit.

The standard conditions also contain references to BAAQMD Regulation 1 and Regulation 2. These are the District's General Provisions and Permitting rules.

Changes to permit:

> The following language will be added to Standard Condition I.B.1: "If the permit renewal has not been issued by, but a complete application for renewal has been submitted in accordance with the above deadlines, the existing permit will continue in force until the District takes final action on the renewal application."_This is the "application shield" pursuant to BAAQMD Regulation 2-6-407.

The following language will be added as Standard Condition I.B.12. "The permit holder is responsible for compliance, and certification of compliance, with all conditions of the permit, regardless whether it acts through employees, agents, contractors, or subcontractors. (Regulation 2-6-307)" The purpose is to reiterate that the Permit Holder is responsible for ensuring that all activities at the facility comply with all applicable requirements.

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., S-24).

Permitted sources are those sources that require a BAAQMD operating permit pursuant to BAAQMD Rule 2-1-302.

Significant sources are those sources that have a potential to emit of more than 2 tons of a "regulated air pollutant," as defined in BAAQMD Rule 2-6-222, per year or 400 pounds of a "hazardous air pollutant," as defined in BAAQMD Rule 2-6-210, per year. There are no unpermitted significant sources.

All abatement (control) devices that control permitted or significant sources are listed. Each abatement device whose primary function is to reduce emissions is identified by an A and a number (e.g., A-24).

The equipment section is considered to be part of the facility description. It contains information that is necessary for applicability determinations, such as fuel types, contents or sizes of tanks, etc. This information is part of the factual basis of the permit.

Each of the permitted sources has previously been issued a permit to operate pursuant to the requirements of BAAQMD Regulation 2, Permits. These permits are issued in accordance with state law and the District's regulations. The capacities in the permitted sources table are the maximum allowable capacities for each source, pursuant to Standard Condition I.J and Regulation 2-1-403.

Following are explanations of the differences in the equipment list between the time that the facility originally applied for a Title V permit and the permit proposal date:

Regulation 2, Rule 1 was amended in 2000 and 2001 to require permits for the following engines:

S-130 Emergency Electric Generator, natural gas fired
S-131 Emergency Electric Generator, diesel engine
S-132 Emergency Electric Generator, diesel engine
S-133 Emergency Electric Generator, diesel engine

<u>Changes to permit:</u>

S-130 through S-133 will be added to Table II-A Permitted Sources.

Operating parameters (pressure drop) will be added for the A1, A41, A42, A48, A50, A58, A520, A521, A522, A560, A561, A562, and A563 Baghouses.

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. If a generally applicable requirement applies specifically to a source that is permitted or significant, the standard will also appear in Section IV and the monitoring for that requirement will appear in Sections IV and VII of the permit. Parts of this section apply to all facilities (e.g., particulate, architectural coating, odorous substance, and sandblasting standards). In addition, standards that apply to insignificant or unpermitted sources at a facility (e.g., refrigeration units that use more than 50 pounds of an ozone-depleting compound) are placed in this section.

Unpermitted sources are exempt from normal District permits pursuant to an exemption in BAAQMD Regulation 2, Rule 1. They may, however, be specifically described in a Title V permit if they are considered ***significant sources*** pursuant to the definition in BAAQMD Rule 2-6-239.

Changes to permit:
Language will be added to Section III to clarify that this section contains requirements that may apply to temporary sources. This provision allows contractors that have "portable" equipment permits that require them to comply with all applicable requirements to work at the facility on a temporary basis, even if the permit does not specifically list the temporary source. Examples are temporary sand-blasting equipment.

Section III will be modified to say that SIP standards are now found on EPA's website and are not included as part of the permit.

The note regarding SIP information from the Rule Development Section will be deleted since the SIP standards are now found on EPA's website.

Table III will be updated by adding the following rules and standards to conform to current practice:

- BAAQMD Regulation 2, Rule 1, General Requirements
- BAAQMD 2-1-429, Federal Emissions Statement
- SIP Regulation 2, Rule 1, General Requirements
- SIP Regulation 5, Open Burning
- Regulation 8, Rule 2, Miscellaneous Operations
- BAAQMD Regulation 8, Rule 40 Aeration of Contaminated Soil and Removal of Underground Storage Tanks
- BAAQMD Regulation 8, Rule 47, Air Stripping and Soil Vapor Extraction Operations
- SIP Regulation 8, Rule 51, Adhesive and Sealant Products
- California Health and Safety Code Section 41750 et seq., Portable Equipment
- California Health and Safety Code Section 44300 et seq., Air Toxics “Hot Spots” Information and Assessment Act of 1987

- 40 CFR Part 61, Subpart M, National Emission Standards for Hazardous Air Pollutants – National Emission Standard for Asbestos

The dates of adoption or approval of the rules and their "federal enforceability" status in Table III will be updated.

IV. Source-Specific Applicable Requirements

This section of the permit lists the applicable requirements that apply to permitted or significant sources. These applicable requirements are contained in tables that pertain to one or more sources that have the same requirements. The order of the requirements is:

- District Rules
- SIP Rules (if any) are listed following the corresponding District rules. SIP rules are District rules that have been approved by EPA for inclusion in the California State Implementation Plan. SIP rules are "federally enforceable" and a "Y" (yes) indication will appear in the "Federally Enforceable" column. If the SIP rule is the current District rule, separate citation of the SIP rule is not necessary and the "Federally Enforceable" column will have a "Y" for "yes". If the SIP rule is not the current District rule, the SIP rule or the necessary portion of the SIP rule is cited separately after the District rule. The SIP portion will be federally enforceable; the non-SIP version will not be federally enforceable, unless EPA has approved it through another program.
- Other District requirements, such as the Manual of Procedures, as appropriate.
- Federal requirements (other than SIP provisions)
- BAAQMD permit conditions. The text of BAAQMD permit conditions is found in Section VI of the permit.
- Federal permit conditions. The text of Federal permit conditions, if any, is found in Section VI of the permit.

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. All monitoring requirements are cited in Section IV. Section VII is a cross-reference between the limits and monitoring requirements. A discussion of monitoring is included in Section C.VII of this permit evaluation/statement of basis.

Complex Applicability Determinations

The A9 Electrostatic Precipitator is not subject to CAM per 64.2(b)(vi) since the A-9 is equipped with a continuous opacity monitor that monitors compliance with the visible emission limitations of BAAQMD Regulations 6-301 and 6-302.

Changes to permit:
Section IV will be modified to say that SIP standards are now found on EPA's website and are not included as part of the permit.

Section IV will be modified to include new conditions #21614 and #20003 (applications 9494 and 5183) for both sources 11 and 12 Glass Melting Furnaces. The new conditions include the installation of NOx CEMs to demonstrate that no increase in NOx emissions has occurred.

Table IV-K will be added to address the Emergency Generators/Engines. This table will include condition #22050 that was imposed under application 4613.

BAAQMD Regulation 1-523 and SIP Regulation 1-523, Parametric Monitoring and Recordkeeping Procedures will be added to the Part IV tables for sources that are equipped with parametric monitors.

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.

The BAAQMD Compliance and Enforcement Division has conducted a review of compliance over the past year and has no records of compliance problems at this facility during the past year. The compliance report is contained in Appendix A of this permit evaluation and statement of basis.

Changes to permit:

None

VI. Permit Conditions

During the Title V permit development, the District has reviewed the existing permit conditions, deleted the obsolete conditions, and, as appropriate, revised the conditions for clarity and enforceability. Each permit condition is identified with a unique numerical identifier, up to five digits.

When necessary to meet Title V requirements, additional monitoring, recordkeeping, or reporting has been added to the permit.

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.

The existing permit conditions are derived from previously issued District Authorities to Construct (A/C) or Permits to Operate (P/O). Permit conditions may also be imposed or revised as part of the annual review of the facility by the District pursuant to California Health and Safety Code (H&SC) § 42301(e), through a variance pursuant to H&SC § 42350 et seq., an order of abatement pursuant to H&SC § 42450 et seq., or as an administrative revision initiated by District staff. After issuance of the Title V permit, permit conditions will be revised using the procedures in Regulation 2, Rule 6, Major Facility Review.

Conditions that are obsolete or that have no regulatory basis have been deleted from the permit.

Conditions have also been deleted due to the following:

- Redundancy in record-keeping requirements.
- Redundancy in other conditions, regulations and rules.
- The condition has been superseded by other regulations and rules.
- The equipment has been taken out of service or is exempt.
- The event has already occurred (i.e. initial or start-up source tests).

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.

Additional monitoring will be added, where appropriate, to assure compliance with the applicable requirements.

Changes to permit:

Permit condition #22050 will be added for the Emergency Generators/Engines (application 4613).

Permit condition #20003 will be added for changes at S-12 that include the installation of NOx and O2 CEMs, and NOx and CO emissions limits (application 5183). NOx and CO emission limits were established in order to demonstrate that a modification has not occurred and the monitoring was added to provide proof. The Authority to Construct condition #20003, parts 1, 2, and 3 have been removed since the unit was installed in compliance with these conditions and are obsolete.

Permit condition #21614 will be added for changes at S-11 that include the installation of NOx and O2 CEMs, and NOx and CO emissions limits (application 9494). NOx and CO emission limits were established in order to demonstrate that a modification has not occurred and the monitoring was added to provide proof. The Authority to Construct condition #21614, parts 1, 2, and 3 will be removed since the unit was installed in compliance with these conditions and are obsolete.

Condition # 8395 part 4 and condition #16591, part 2 will be modified to include the operating range for the baghouses.

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. The applicable requirements for monitoring are completely 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 with the following exceptions.

The tables below contain only the limits for which there is no monitoring or inadequate monitoring in the applicable requirements. The District has examined the monitoring for other limits and has determined that monitoring is adequate to provide a reasonable assurance of compliance. Calculations for potential to emit will be provided in the discussion when no monitoring is proposed due to the size of a source.

Monitoring decisions are typically the result of a balancing of several different factors including: 1) the likelihood of a violation given the characteristics of normal operation, 2) degree of variability in the operation and in the control device, if there is one, 3) the potential severity of impact of an undetected violation, 4) the technical feasibility and probative value of indicator monitoring, 5) the economic feasibility of indicator monitoring, and 6) whether there is some other factor, such as a different regulatory restriction applicable to the same operation, that also provides some assurance of compliance with the limit in question.

These factors are the same as those historically applied by the District in developing monitoring for applicable requirements**.** It follows that, although Title V calls for a re-examination of all

monitoring**,** there is a presumption that these factors have been appropriately balanced and incorporated in the District's prior rule development and/or permit issuance. It is possible that, where a rule or permit requirement has historically had no monitoring associated with it, no monitoring may still be appropriate in the Title V permit if, for instance, there is little likelihood of a violation**.** Compliance behavior and associated costs of compliance are determined in part by the frequency and nature of associated monitoring requirements. As a result, the District will generally revise the nature or frequency of monitoring only when it can support a conclusion that existing monitoring is inadequate**.**

NOx Discussion:

Both sources S11 and S12 Glass Melting Furnaces will have the requirement added to install NOx CEMs to demonstrate compliance with new NOx limits imposed under applications 9494 and 5183.

CO Discussion:

Annual CO source test requirements will be added to S11 and S12 to demonstrate compliance with new CO limits.

SO_2 Sources

S# & Description	Emission Limit Citation	Federally Enforceable Emission Limit	Monitoring
S10, S11, S12, S130, S131, S132, S133	BAAQMD 9-1-301	Ground level concentrations of SO2 shall not exceed: 0.5 ppm for 3 consecutive minutes AND 0.25 ppm averaged over 60 consecutive minutes AND 0.05 ppm averaged over 24 hours	None
S10, S11, S12	BAAQMD 9-1-302	300 ppm (dry)	Annual source test
S130, S131, S132, S133	BAAQMD 9-1-304	Sulfur content of fuel < 0.5% by weight	Fuel certification

SO2 Discussion:

BAAQMD Regulation 9-1-301

Area monitoring to demonstrate compliance with the ground level SO2 concentration requirements of Regulation 9-1-301 is at the discretion of the APCO (per BAAQMD Regulation 9-1-501). This facility does not have equipment that emits large amounts of SO2 and therefore is not required to have ground level monitoring by the APCO.

All facility combustion sources are subject to the SO2 emission limitations in District Regulation 9, Rule 1 (ground-level concentration and emission point concentration). In EPA's June 24, 1999 agreement with CAPCOA and ARB, "Periodic Monitoring Recommendations for Generally Applicable Requirements in SIP", EPA has agreed that natural-gas-fired combustion sources do not need additional monitoring to verify compliance with Regulation 9, Rule 1, since violations of the regulation are unlikely. Therefore, no monitoring is necessary for this requirement.

S10 – S12 Glass Furnaces have an annual source test requirement in order to demonstrate compliance with 9-1-302. This should be adequate monitoring since both the fuel and the operation do not vary.

S130 – S133 Engines will comply with the 0.5% sulfur limit in BAAQMD Regulation 9-1-304 requiring a fuel certification from the vendor for each fuel shipment. This is standard sulfur monitoring for engines.

PM Sources

S# & Description	Emission Limit Citation	Federally Enforceable Emission Limit	Monitoring
S10, S11, S12	BAAQMD Regulation 6-310 and 311	Particulate Weight limitation and General Operations	Annual Source Test
S24 – S33	BAAQMD Regulation 6-310	0.15 gr/dscf	Weekly pressure drop monitoring

PM Discussion:

BAAQMD Regulation 6 “Particulate Matter and Visible Emissions”

Visible Emissions

BAAQMD Regulation 6-301 limits visible emissions to no darker than 1.0 on the Ringelmann Chart (except for periods or aggregate periods less than 3 minutes in any hour). Visible emissions are normally not associated with combustion of gaseous fuels, such as natural gas. Source 130 burns natural gas exclusively, therefore, per the EPA's June 24, 1999 agreement with CAPCOA and ARB titled "Summary of Periodic Monitoring Recommendations for Generally Applicable Requirements in SIP", no monitoring is required to assure compliance with this limit for these sources.

Particulate Weight Limitation and Allowable Rate of Emissions Based on Process Weight Rate

BAAQMD Regulation 6-310 limits filterable particulate (FP) emissions from any source to 0.15 grains per dry standard cubic foot (gr/dscf) of exhaust volume. Section 310.3 limits filterable particulate emissions from "heat transfer operations" to 0.15 gr/dscf @ 6% O_2. These are the "grain loading" standards.

Exceedances of the grain loading standards are normally not associated with combustion of gaseous fuels, such as natural gas. Source 130 burns natural gas exclusively, therefore, per the EPA's July 2001 agreement with CAPCOA and ARB entitled "CAPCOA/CARB/EPA Region IX Recommended Periodic Monitoring for Generally Applicable Grain Loading Standards in the SIP: Combustion Sources: Summary of Periodic Monitoring Recommendations for Generally Applicable Requirements in SIP", no monitoring is required to assure compliance with this limit for these sources.

The facility conducts annual source tests on the furnaces (S10, S11, and S12) in order to demonstrate compliance with both 6-310 and 6-311.

POC Sources

S# & Description	Emission Limit Citation	Federally Enforceable Emission Limit	Monitoring
S67	BAAQMD Regulation 8-2-301	15 pounds per day and 300 ppm carbon	none

POC Discussion:

S67 Mold Repair Coating Oven has not operated in the past three years. The facility is keeping the permit active. When operating, this source uses a solid film lubricant containing both butanol and xylene. The amount of lubricant usage is typically 1.7 liters per week. Assuming 3 liters/wk at 7.24 #/gal, results in 5.72 pounds per week which is well beneath 15 pounds per day. Therefore, monitoring is not necessary since the potential to emit POC is well below the applicable emission limitation.

Lead Sources

S# & Description	Emission Limit Citation	Federally Enforceable Emission Limit	Monitoring
S10, S11, S12	BAAQMD Regulation 11-1-301	Daily limitation	Annual Source Test

Lead Discussion:

The facility conducts annual source tests in order to demonstrate compliance with Regulation 11-1-301.

Changes to permit:

The headings at the top of the tables will be updated. "Pollutant" will be changed to "Type of Limit" since every limit is not a pollutant limit. "Emission Limit Citation" will be changed to "Citation of Limit" since not every limit is an emission limit. "Emission Limit" will be changed to "Limit" since not every limit is an emission limit.

The description of the BAAQMD 6-301 limit in Section VII will be corrected to say "for < 3 min/hr."

The "type of limit" will be changed to "Opacity" for BAAQMD Regulation 6-301, since it is an opacity standard.

The "type of limit" will be changed to "FP" for BAAQMD Regulation 6-310 and 6-311, since it is a filterable particulate standard.

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.

This permit has no streamlining.

Following is the detail of the permit shields that were requested by the applicant.

1. The following requested permit shields are disallowed: None

2. The following permit shields are allowed:

Table VII-A
S-10, 11, 12, GLASS MELTING FURNACES

Citation	Title or Description (Reason not applicable)
40 CFR 60, Subpart CC	Standards of Performance for Glass Manufacturing Plants (Rebricking of the furnace, which occurs every several years, does not meet the definition of reconstruction under 40 CFR 60.15.)

Changes to permit:
The standard language in the Section IX, Permit Shield, will be updated.

X. Revision History

A Revision History Section to document the Title V Permit history of this plant will be added to the permit.

XI. Glossary

The glossary will be updated.

XII. Appendix A - State Implementation Plan

Changes to permit:
Section X will be deleted since SIP standards are now found on EPA's website and are not included as part of the permit. The website address will be included in Sections III and IV.

D. Alternate Operating Scenarios:

No alternate operating scenario has been requested for this facility.

E. Compliance Status:

A January 5, 2006 office memorandum from the Director of Compliance and Enforcement, to the Director of Permit Services, presents a review of the compliance record of A0030. The

Compliance and Enforcement Division staff has reviewed the records for A0030 for the period between November 1, 2000 through December 31, 2005. This review was initiated as part of the District evaluation of an application by Owens-Brockway for a Title V permit. During the period subject to review, activities known to the District include:

- There were Notices of Violation for opacity violations issued during this review period. The facility has returned to compliance.
- The District did not receive any alleged complaints.
- The facility is not operating under a Variance or an Order of Abatement from the District Board.
- There were no monitor excesses or equipment breakdowns reported or documented by District staff.

The owner certified that all equipment was operating in compliance. No non-compliance issues have been identified to date.

F. Differences between the Application and the Proposed Permit:

This Title V renewal permit application (#10138) was originally submitted on June 30, 2004. This version is the basis for constructing the proposed renewal Title V permit. Revisions were made to the Title V renewal application 10138 as a result of changes at the facility that were made pursuant to Permit Application 10468. Changes to the permit include the following:

The authority to construct for the rebuilding of S11 Glass Melting Furnace was issued under application 9494.

The authority to construct for the rebuilding of S12 Glass Melting Furnace was issued under application 5183.

S130 Natural Gas Fired Emergency Generator and S131, S132, and S133 Emergency Diesel Engines were added to the permitted source list under application 4613.

APPENDIX A

BAAQMD Compliance Report

APPENDIX B

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

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.

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.

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)

NOx
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, NOx, 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.

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 C

Engineering Evaluation for Application 5183

Evaluation Report
Owens-Brockway Glass Container, Plant #30
Application Number 5183

Background

Owens-Brockway Glass Container (OB) is proposing to repair its S-12 E Furnace at its facility located in Oakland. OB has proposed several changes and as usual adds the caveat that more work may need to be performed once the unit is cold and inspected. This Authority to Construct will include only the work specified and if more work is required another application will also be required. OB claims that this repaired unit's emissions will not exceed the existing unit's emissions. To ensure no net increase in emissions, source test data has been used to establish emission limits for both NOx and CO for this source. This source will also be required to install a NOx CEM in order to demonstrate compliance with both a NOx emission rate and annual emission limit.

The district has changed its definition of a New Source in Regulation 2-1-232.6 to include rebricking of glass melting furnaces where the changes in the furnace design result in a change to the heat generation or absorption. It could be argued that the proposed changes change the heat absorption since the replacement refractory will be better than the old or existing refractory. The new refractory will reduce heat loss. The reduced heat loss should assist in the reduction of NOx emissions from this furnace. The intention of this definition was to require the review of all rebricking activities since this is when improvements are made to the sources performance and these improvements should include the addition of control equipment to reduce the emissions. These furnaces need to be rebricked approximately every ten years and this is the only time the furnace is cold and could have additional work performed to reduce emissions.

Combustion of natural gas in the furnace will result in achieving lower NOx emissions without producing excess carbon monoxide and hydrocarbon emissions, when the oxygen content of the flue gases in the exhaust ports is less than 2 percent by volume. As the campaign progresses, air filtration through cracks, air leakage through valves and dampers, increased pressure through the regenerators and other effects combine to make combustion less efficient. As the refractory ages, the heat loss increases, requiring harder firing. To maintain a maximum combustion throughout the campaign an air to fuel ratio should be incorporated as a continuous flue gas oxygen analyzer at the exhaust ports. In addition, the system should automatically adjust to compensate for changes in ambient air density. This can also be addressed through an oxy-fuel system that utilizes pure oxygen and eliminates the nitrogen contribution from air.

Establishing the NOx emission rate was performed using district source test data. There were a total of five district source tests measuring NOx emissions at S-12 E Furnace. The first test date was in June of 1995 and the last test was performed in May of 2002. Four out of five of the tests included emissions from S-11 D Furnace since the two furnaces now share a common stack. OB had conducted a source test in 1997 that produced an emission rate of 5.3 pounds of NOx per ton pulled. I did not find a copy of this test but consider it to be an anomaly since all of the source test data from the district ranges from 3.51 – 4.14 pounds of NOx per ton pulled. The average of the district source test data for NOx is 3.93 pounds of NOx per ton pulled (#/t). OB objected to the only district NOx source test at E Furnace with a result of 3.51 #/t claiming that the flowrate

was determined incorrectly. Furthermore, CARB has requested that the district reduce the NOx emission rate in Regulation 9-12 to 4.0 #/t but the district has not had the opportunity to make this change. In the interest of fairness to both parties, the district will issue an Authority to Construct with a NOx emission rate of 4.0 #/t with a 3 hour averaging period. The scope of the work performed will be limited to information provided within this application.

In October of 2002, Owens-Brockway decided to change the combustion system in order to more comfortably meet the 4.0 pounds of NOx per ton pulled requirement. The changes include a oxygen-enriched air system (OEAS), which will provide for better oxygen and emissions control. The new system will also include individual port control, which will allow each ports oxygen and gas to be controlled separately. The new burners will be of the staged combustion design, which have demonstrated NOx emissions less than 4.0 pounds per ton pulled.

Emission Calculations

No emission increases are expected as a result of this application. District source test data was used to establish both emission rates and permitted levels for both NOx and CO. The district source test data is attached.

NOx: 4.0 #/t
CO: 0.70 #/t

Plant Cumulative Increase

Emissions are not expected to increase as a result of this application.

Toxic Risk Screening Analysis

A risk analysis was not required for this application since the emissions are not expected to increase.

Statement of Compliance

The S-12 E Furnace will comply with Regulation 9-12-301, which requires that NOx emissions not exceed 5.5 #/ton pulled. This facility will accept a permit condition at 4.0 #/ton pulled in order to comply with both Regulation 2-2 and the anticipated adoption of a new 9-12 limit.

This application will not trigger BACT since facility is accepting permit conditions that ensure that this repair will not result in an increase in emissions.

This application will not require offsets since the facility's emissions are not expected to increase as a result of this application.

The project is categorically exempt from CEQA under Regulation 2-1-312.6, which exempts applications exclusively for repair, maintenance or minor alteration of existing facilities, equipment or sources involving negligible or no expansion of use beyond that previously existing.

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 toxic trigger levels.

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

Recommendation

Recommend that an Authority to Construct be granted for:

S-12 Glass Melting Furnace, 44 MMBtu/h, equipped with a rectangular refiner and two Forehearths

Conditions

1. The owner/operator of S-12 shall only perform the following refractory changes:
   a) Port crown insulation removal, No.1 port crown to be replaced and No.2 port crown possibly replaced.
   b) Melter crown insulation: crown will be removed and re-installed using the new insulation.
   c) Skew line Zircon buffer course: 3" Zircon will be added between crown and breastwall.
   d) Step in melter endwall for crown: Crown and charge endwall completely replaced with the step in the endwall being eliminated.
   e) Melter peepholes: Replaced with current standard 'C' shape, C-2003.
   f) Melter bottom thermocouple block design: The melter bottom thermocouple block design will have independent blocks for the 'in glass' and 'refractory' thermocouples. Adjacent bottom paving to be re-sized.
   g) Refiner throat design: New design sloped throat to be installed. (2-1-301)
2. The owner/operator of S-12 shall only change the bottom of the forehearths to add the bottom cooling. All port valves, burner tips and other burner hardware shall be replaced with identical equipment. (2-1-301)
3. The owner/operator of S-12 shall not perform any work that was not covered in the memo from JE Lehman to Mark Tussing, dated 3/20/02. (2-1-301)
4. The owner/operator of S-12 shall install the identical number (10) of burners to those being replaced. The replaced combustion system shall not increase firing rate of S-12. The new combustion system shall include the Individual port control as described in the documents dated 10/14/02 and shall also include oxygen-enriched air staging (OEAS) as described in the documents dated 10/15/02. (2-1-301)
5. The owner/operator of S-12 shall not exceed 4.0 pounds of NOx per ton pulled averaged over any consecutive 3 hour period. (cum inc)
6. The owner/operator of S-12 shall not exceed 0.70 pounds of CO per ton pulled averaged over any consecutive 3 hour period. (cum inc)

7. The owner/operator of S-12 shall install and operate a district approved NOx and O2 continuous emissions monitors (CEMs) and a flowmeter with a recorder within 180 days of receipt of this Authority to Construct. These monitors shall be pre-approved by the district's source test manager. These monitors shall be used to determine compliance with condition #5. (cum inc)
8. The owner/operator of S-12 shall conduct a district pre-approved source test with 45 days of the startup and annually thereafter of S-12 in order to demonstrate compliance with condition #'s 5 and 6. The results of this source test shall be submitted to the district within 45 days of the test date. (cum inc)
9. The owner/operator of S-12 shall maintain a District approved monthly log of all CEM data, flowmeter data, pull rate, and source test data for S-12. This log shall be kept on site for at least five years from the date of entry and be made available to District staff upon request. (record keeping)

by_____date_____
Gregory Solomon
Air Quality Engineer II

APPENDIX D

Engineering Evaluation for Application 9494

Evaluation Report
Owens-Brockway Glass Container, Plant #30
Application Number 5183

Background

Owens-Brockway Glass Container (OB) is proposing to repair its S-12 E Furnace at its facility located in Oakland. OB has proposed several changes and as usual adds the caveat that more work may need to be performed once the unit is cold and inspected. This Authority to Construct will include only the work specified and if more work is required another application will also be required. OB claims that this repaired unit's emissions will not exceed the existing unit's emissions. To ensure no net increase in emissions, source test data has been used to establish emission limits for both NOx and CO for this source. This source will also be required to install a NOx CEM in order to demonstrate compliance with both a NOx emission rate and annual emission limit.

The district has changed its definition of a New Source in Regulation 2-1-232.6 to include rebricking of glass melting furnaces where the changes in the furnace design result in a change to the heat generation or absorption. It could be argued that the proposed changes change the heat absorption since the replacement refractory will be better than the old or existing refractory. The new refractory will reduce heat loss. The reduced heat loss should assist in the reduction of NOx emissions from this furnace. The intention of this definition was to require the review of all rebricking activities since this is when improvements are made to the sources performance and these improvements should include the addition of control equipment to reduce the emissions. These furnaces need to be rebricked approximately every ten years and this is the only time the furnace is cold and could have additional work performed to reduce emissions.

Combustion of natural gas in the furnace will result in achieving lower NOx emissions without producing excess carbon monoxide and hydrocarbon emissions, when the oxygen content of the flue gases in the exhaust ports is less than 2 percent by volume. As the campaign progresses, air filtration through cracks, air leakage through valves and dampers, increased pressure through the regenerators and other effects combine to make combustion less efficient. As the refractory ages, the heat loss increases, requiring harder firing. To maintain a maximum combustion throughout the campaign an air to fuel ratio should be incorporated as a continuous flue gas oxygen analyzer at the exhaust ports. In addition, the system should automatically adjust to compensate for changes in ambient air density. This can also be addressed through an oxy-fuel system that utilizes pure oxygen and eliminates the nitrogen contribution from air.

Establishing the NOx emission rate was performed using district source test data. There were a total of five district source tests measuring NOx emissions at S-12 E Furnace. The first test date was in June of 1995 and the last test was performed in May of 2002. Four out of five of the tests included emissions from S-11 D Furnace since the two furnaces now share a common stack. OB had conducted a source test in 1997 that produced an emission rate of 5.3 pounds of NOx per ton pulled. I did not find a copy of this test but consider it to be an anomaly since all of the source test data from the district ranges from 3.51 – 4.14 pounds of NOx per ton pulled. The average of the district source test data for NOx is 3.93 pounds of NOx per ton pulled (#/t). OB objected to the only district NOx source test at E Furnace with a result of 3.51 #/t claiming that the flowrate

was determined incorrectly. Furthermore, CARB has requested that the district reduce the NOx emission rate in Regulation 9-12 to 4.0 #/t but the district has not had the opportunity to make this change. In the interest of fairness to both parties, the district will issue an Authority to Construct with a NOx emission rate of 4.0 #/t with a 3 hour averaging period. The scope of the work performed will be limited to information provided within this application.

In October of 2002, Owens-Brockway decided to change the combustion system in order to more comfortably meet the 4.0 pounds of NOx per ton pulled requirement. The changes include a oxygen-enriched air system (OEAS), which will provide for better oxygen and emissions control. The new system will also include individual port control, which will allow each ports oxygen and gas to be controlled separately. The new burners will be of the staged combustion design, which have demonstrated NOx emissions less than 4.0 pounds per ton pulled.

Emission Calculations

No emission increases are expected as a result of this application. District source test data was used to establish both emission rates and permitted levels for both NOx and CO. The district source test data is attached.

NOx: 4.0 #/t
CO: 0.70 #/t

Plant Cumulative Increase

Emissions are not expected to increase as a result of this application.

Toxic Risk Screening Analysis

A risk analysis was not required for this application since the emissions are not expected to increase.

Statement of Compliance

The S-12 E Furnace will comply with Regulation 9-12-301, which requires that NOx emissions not exceed 5.5 #/ton pulled. This facility will accept a permit condition at 4.0 #/ton pulled in order to comply with both Regulation 2-2 and the anticipated adoption of a new 9-12 limit.

This application will not trigger BACT since facility is accepting permit conditions that ensure that this repair will not result in an increase in emissions.

This application will not require offsets since the facility's emissions are not expected to increase as a result of this application.

The project is categorically exempt from CEQA under Regulation 2-1-312.6, which exempts applications exclusively for repair, maintenance or minor alteration of existing facilities, equipment or sources involving negligible or no expansion of use beyond that previously existing.

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 toxic trigger levels.

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

Recommendation

Recommend that an Authority to Construct be granted for:

S-12 Glass Melting Furnace, 44 MMBtu/h, equipped with a rectangular refiner and two Forehearths

Conditions

10. The owner/operator of S-12 shall only perform the following refractory changes:
    a) Port crown insulation removal, No.1 port crown to be replaced and No.2 port crown possibly replaced.
    b) Melter crown insulation: crown will be removed and re-installed using the new insulation.
    c) Skew line Zircon buffer course: 3" Zircon will be added between crown and breastwall.
    d) Step in melter endwall for crown: Crown and charge endwall completely replaced with the step in the endwall being eliminated.
    e) Melter peepholes: Replaced with current standard 'C' shape, C-2003.
    f) Melter bottom thermocouple block design: The melter bottom thermocouple block design will have independent blocks for the 'in glass' and 'refractory' thermocouples. Adjacent bottom paving to be re-sized.
    g) Refiner throat design: New design sloped throat to be installed. (2-1-301)
11. The owner/operator of S-12 shall only change the bottom of the forehearths to add the bottom cooling. All port valves, burner tips and other burner hardware shall be replaced with identical equipment. (2-1-301)
12. The owner/operator of S-12 shall not perform any work that was not covered in the memo from JE Lehman to Mark Tussing, dated 3/20/02. (2-1-301)
13. The owner/operator of S-12 shall install the identical number (10) of burners to those being replaced. The replaced combustion system shall not increase firing rate of S-12. The new combustion system shall include the Individual port control as described in the documents dated 10/14/02 and shall also include oxygen-enriched air staging (OEAS) as described in the documents dated 10/15/02. (2-1-301)
14. The owner/operator of S-12 shall not exceed 4.0 pounds of NOx per ton pulled averaged over any consecutive 3 hour period. (cum inc)
15. The owner/operator of S-12 shall not exceed 0.70 pounds of CO per ton pulled averaged over any consecutive 3 hour period. (cum inc)

16. The owner/operator of S-12 shall install and operate a district approved NOx and O2 continuous emissions monitors (CEMs) and a flowmeter with a recorder within 180 days of receipt of this Authority to Construct. These monitors shall be pre-approved by the district's source test manager. These monitors shall be used to determine compliance with condition #5. (cum inc)
17. The owner/operator of S-12 shall conduct a district pre-approved source test with 45 days of the startup and annually thereafter of S-12 in order to demonstrate compliance with condition #'s 5 and 6. The results of this source test shall be submitted to the district within 45 days of the test date. (cum inc)
18. The owner/operator of S-12 shall maintain a District approved monthly log of all CEM data, flowmeter data, pull rate, and source test data for S-12. This log shall be kept on site for at least five years from the date of entry and be made available to District staff upon request. (record keeping)

by_____date_____
Gregory Solomon
Air Quality Engineer II

APPENDIX E

Engineering Evaluation for Application 4613

ENGINEERING EVALUATION
OWENS-BROCKWAY GLASS CONTAINER INC.
APPLICATION #4613 – PLANT # 30

BACKGROUND

Owens-Brockway Glass Container Inc. submitted permit application #4613 to obtain a permit to operate for their existing standby emergency electric generators. The following standby emergency electric generators are the Loss-of-Exemption sources:

S-130 Emergency Electric Generator: natural gas engine, Waukesha, F1197GU, 188hp.

S-131 Emergency Electric Generator: diesel engine, Fairbanks-Morse, 50A6T-6, 335hp.

S-132 Emergency Electric Generator: diesel engine, Caterpillar, 379A, 610hp.

S-133 Emergency Electric Generator: diesel engine, Allis-Chalmer, 25000, 369hp.

S-130, S-131, S-132, and S-133 have been operating unmodified since 1980's. S-130, S-131, S-132, and S-133 have lost their exemption status due to changes in regulation.

EMISSIONS SUMMARY

S-130, S-131, S-132, and S-133 are Loss-of-Exemption sources installed before May 17, 2000; therefore, emission calculation is not required.

CUMULATIVE INCREASE

The emissions from these sources do not count toward the facility's cumulative increase, as they are not "new or modified sources."

BACT

These sources are not subject to BACT requirements pursuant to Regulation 2, Rule 2, Section 301, as they are loss-of-exemption sources.

OFFSETS

Pursuant to Regulation 2, Rule 2, Section 302, offsets are applicable only to new or modified sources. Therefore, offsets are not required.

TOXIC RISK SCREENING ANALYSIS

A risk screen is not required for the equipment evaluated in this permit application, as it was installed before May 17, 2000. Risk screens are only required for engines installed on or after May 17, 2000, which is the date that the permit exemption in Regulation 2, Rule 1 was changed.

STATEMENT OF COMPLIANCE

S-130, S-131, S-132, and S-133 are loss-of-exemption sources, standby emergency electric generators; therefore, according to Regulation 9, Rule 8, Section 110.4, these sources are exempted from Regulation 9, Rule 8, Section 301, 302, and 502.

9-8-110 Exemptions: The requirements of Sections 9-8-301, 302, and 502 shall not apply to the following:
110.4 Emergency standby engines.

Pursuant to the district policy, no annual limit is proposed for the hours of operation of S-130 because it is less than 250 hp and was installed prior to May 17, 2000.

According to Regulation 9, Rule 8, Section 330, S-131, S-132, and S-133 are limited to 100 hours per calendar year for operation for reliability-related activities.

S-130, S-131, S-132, and S-133 are subject to Regulation 9, Rule 8, Section 231 and Section 232, which define emergency usage and reliability-related activities.

S-130, S-131, S-132, and S-133 are emergency standby engines; therefore they are subject to Regulation 9, Rule 8, Section 530, which specifies the monitoring and recordkeeping requirements.

As per Regulation 2, Rule 1, Section 312.4, these sources are exempt from CEQA requirements because the sources are loss-of exemption sources.

This project is a loss-of exemption case and is therefore not subject to the public school notification requirements of Regulation 2-1-412.

S-130, S-131, S-132, and S-133 are also subject to the SO2 limitations of 9-1-301 and 304, which impose guidelines on ground level SOX concentrations and require sulfur content no greater than 0.5% by weight, respectively. Compliance with both requirements is considered very likely since diesel fuel with 0.15% by weight sulfur is mandated for use in California.

As per Reg. 6-303, a person shall not emit for a period or periods aggregating more than three minutes in any hour, a visible emission which is as dark or darker than No. 2 on the Ringelmann Chart, or of such opacity as to obscure an observer’s view to an equivalent or greater degree, nor shall said emission, as perceived by an opacity sensing device in good working order, where such device is required by the District regulations, be equal to a greater than 40% opacity.

A toxic risk screening analysis is not required for this project.

BACT and offsets are not triggered.

CONDITIONS

1. **Hours of Operation:** The emergency standby generators, S-130, S-131, S-132, and S-133, shall only be operated for emergency use or for reliability-related activities. No time limit is imposed on the operation for reliability-related activities for S-130. Operation for reliability-related activities shall not exceed 100 hours per calendar year for S-131, S-132, and S-133. Operation for emergency use is unlimited. [Basis: 9-8-330 and district policy]

2. **Emergency use** is defined as the use of an emergency standby engine during any of the following: [Basis: 9-8-231]
    1 In the event of loss of regular natural gas supply;
    2 In the event of failure of regular electric power supply;
    3 Flood mitigation;
    4 Sewage overflow mitigation;
    5 Fire;
    6 Failure of a primary motor, but only for such time as needed to repair or replace the primary motor.

3. **Reliability-related activities** is defined as the use of an emergency standby engine during any of the following: [Basis: 9-8-232]
    1 Operation of an emergency standby engine to test its ability to perform for an emergency use;
    2 Operation of an emergency standby engine during maintenance of a primary motor.

4. **Monitoring:** Each emergency standby engine shall be equipped with either: [Basis: 9-8-530]
    1. A non-resettable totalizing meter that measures and records hours of operation.
    2. A non-resettable fuel usage meter

5. **Recordkeeping:** All records shall be kept for at least two years, and shall be available for inspection by District staff upon request. The operator shall keep a monthly log of usage that shall indicate the following: [Basis: 9-8-530, 1-441]
    1. Hours of operation (total)
    2. Hours of operation (emergency) and the nature of the emergency condition.

RECOMMENDATION

Waive the Authority to Construct and issue a conditional Permit to Operate to Owens-Brockway Glass Container Inc. for the following equipment:

S-130 Emergency Electric Generator: natural gas engine, Waukesha, F1197GU, 188hp.

S-131 Emergency Electric Generator: diesel engine, Fairbanks-Morse, 50A6T-6, 335hp.

S-132 Emergency Electric Generator: diesel engine, Caterpillar, 379A, 610hp.

S-133 Emergency Electric Generator: diesel engine, Allis-Chalmer, 25000, 369hp.

Carla Johana Prasetyo Jo
Air Quality Technician