



January 23, 2023

Ms. Fevisetan Akeredolu Gallo Glass Company PO Box 1230 Modesto, CA 95353

Re: Notice of Preliminary Decision – ATC / Certificate of Conformity

District Facility # N-1662 Project # N-1221795

Dear Ms. Akeredolu:

Enclosed for your review is the District's analysis of an application for Authority to Construct for the facility identified above. You requested that a Certificate of Conformity with the procedural requirements of 40 CFR Part 70 be issued with this project. The proposed project is to reduce permitted NOx, SOx and PM10 emissions for Rule 4354 compliance.

The notice of preliminary decision for this project has been posted on the District's website (www.valleyair.org). After addressing all comments made during the 30-day public notice and the 45-day EPA comment periods, the District intends to issue the Authority to Construct with a Certificate of Conformity. Please submit your comments within the 30-day public comment period, as specified in the enclosed public notice. Prior to operating with modifications authorized by the Authority to Construct, the facility must submit an application to modify the Title V permit as an administrative amendment, in accordance with District Rule 2520, Section 11.5.

If you have any questions, please contact Mr. Nick Peirce, Permit Services Manager, at (209) 557-6400.

Thank you for your cooperation in this matter.

Sincerely,

Brian Clements

Director of Permit Services

Enclosures

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

Gerardo Rios, EPA (w/enclosure) via EPS CC:

> Samir Sheikh Executive Director/Air Pollution Control Officer

San Joaquin Valley Air Pollution Control District

Authority to Construct Application Review

Modification of Glass Furnaces to Reduce Permitted Limits of NOx, SOx and PM₁₀ Emissions for District Rule 4354 Compliance

Facility Name: Gallo Glass Company Date: January 12, 2023

Mailing Address: PO Box 1230 Engineer: Jag Kahlon

Modesto, CA 95353 Lead Engineer: James Harader

Contact Person: Feyisetan Akeredolu

Telephone: (209) 272-5895

E-Mail: Feyisetan.akeredolu@ejgallo.com

Application #s: N-1662-1-23, '-2-24, '-3-23, and '-4-25

Project #: N-1221795

Deemed Complete: September 1, 2022

I. Proposal

N-1662-1-23, '-2-24, '-3-23, and '-4-25

Gallo Glass Company has proposed to reduce the permitted NOx, SOx and PM₁₀ emission limits for their glass furnaces to comply with latest requirements of *District Rule 4354 – Glass Melting Furnaces* (12/16/21), which will become effective on and after January 1, 2024. Details on this proposal are as follows:

Gallo Glass Company is proposing to reduce their existing NOx emission limit from 1.3 lb/ton
of glass produced to 0.99 lb/ton of glass produced to comply with the Tier I NOx requirements
in Rule 4354. The existing and newer limits are both on a rolling 30-day average basis.
Review of rolling 30-day average data (June 1, 2020 to May 31, 2022), obtained from the
continuous emissions monitoring system (CEMS), revealed that the existing furnaces are not
operating at or below the proposed NOx limit of 0.99 lb/ton of glass produced at all times.

Per the applicant, NOx emissions will be reduced by minimizing the ambient air ingress to each furnace by providing adequate insulation to each furnace, by increasing protective shield between ambient air and the furnace refractory bricks on the walls and crown, by ensuring air inlet gaps at the burners and inspection ports are properly sealed with quilted sleeves or telescopic seals, and by installing pressure gauges to continually monitor induced draft pressure as a method of detecting areas of air ingress. Gallo Glass will also monitor CO emissions in the furnace exhaust, allowing the operator to tune the furnace to operate in a fuel-rich (low excess oxygen) combustion environment that can reduce NOx emissions. Gallo Glass believes that these physical and operational changes will allow the furnaces to achieve the Tier I NOx limit of Rule 4354.

• Gallo Glass Company is proposing to reduce the existing SOx emission limits from 0.95 lb/ton of glass produced (≥25% by wt. of mixed color cullet) and 0.79 lb/ton of glass produced (<25% by wt. of mixed color cullet) to a single limit of 0.77 lb/ton of glass produced. The existing and newer limits are both on a rolling 30-day average basis. Review of rolling 30-day average CEMS data (June 1, 2020 to May 31, 2022) revealed that the existing furnaces are not operating at or below the proposed SOx limit of 0.77 lb/ton of glass produced at all times.</p>

The applicant states that they will modify the SOx control technique by further optimizing the sorbent (calcium hydroxide) injection rate into the dry scrubber to comply with the reduced SOx limit.

Gallo Glass is proposing to reduce the existing PM₁₀ emission limit from 0.45 lb/ton of glass produced to 0.18 lb/ton of glass produced. The existing and newer limits are both on a block 24-hour average basis. The applicant is not proposing any changes to existing PM10 limit of 0.71 lb/ton of glass produced during full or partial emission control system bypass episodes for routine maintenance.

Gallo Glass Company uses a ceramic dust collector (CDC) system and/or an electrostatic precipitator (ESP) system to reduce PM₁₀ emissions. Source testing conducted in 2019 and 2020 indicates that they are already complying with the reduced PM₁₀ emission rate.

Note that glass melting furnaces at this facility are vented through a common stack which is served by shared emissions control equipment. Therefore, per section 9.4 of Rule 4354, each of the proposed limits is 10% lower than the NOx, SOx and PM10 emission values listed in Table 2 (1.1 lb-NOx/ton of glass produced – Phase I), Table 5 (0.85 lb-SOx/ton of glass produced), and Table 7 (0.20 lb-PM10/ton for container glass) respectively. The reduced NOx, SOx and PM10 limits emission will become effective on and after January 1, 2024.

Gallo Glass Company has received their renewed Title V Permit on August 17, 2022. This modification can be classified as a Title V minor modification pursuant to Rule 2520, and can be processed with a Certificate of Conformity (COC). Since the facility has specifically requested that this project be processed in that manner, the 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct (ATC). Gallo Glass Company must apply to administratively amend their Title V permit.

Disposition of existing ATCs:

ATC N-1662-1-21 (in **Appendix C**) is required to be implemented prior to, or concurrently with the ATC under this project. Therefore, this ATC are being used as base document for the subsequent modification under this project for permit N-1662-1.

The draft ATCs are included in **Appendix A** of this document.

II. Applicable Rules

Rule 1080	Stack Monitoring (12/17/92)		
Rule 1081	Source Sampling (12/16/93)		
Rule 2201	New and Modified Stationary Source Review Rule (8/15/19)		
Rule 2410	Prevention of Significant Deterioration (6/16/11)		
Rule 2520	Federally Mandated Operating Permits (8/15/19)		
Rule 4001	New Source Performance Standards (4/14/99)		
Rule 4002	National Emissions Standards for Hazardous Air Pollutants (5/20/04)		
Rule 4101	Visible Emissions (2/17/05)		
Rule 4102	Nuisance (12/17/92)		
Rule 4201	Particulate Matter Concentration (12/17/92)		
Rule 4301	Fuel Burning Equipment (12/17/92)		
Rule 4354	Glass Melting Furnaces (12/16/21)		
Rule 4801	Sulfur Compounds (12/17/92)		
40 CFR Part 64	Compliance Assurance Monitoring		
CH&SC 41700	Health Risk Assessment		
CH&SC 42301.6	School Notice		
Public Resources Code 21000-21177: California Environmental Quality Act (CEQA)			
California Code of F	Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387: CEQA		
Guidelines			

III. Project Location

The facility is located at 605 S Santa Cruz Ave in Modesto, California. The equipment is not located within 1,000 feet of the outer boundary of a K-12 school. Therefore, the public notification requirement of California Health and Safety Code 42301.6 is not applicable to this project.

IV. Process Description

The furnaces at this site are used to produce glass bottles of various sizes.

V. Equipment Listing

Pre-Project Equipment Description:

As noted in the proposal section, ATC N-1662-1-21 will be used as based document for this permit unit. The equipment description for this unit is shown below.

N-1662-1-21: GLASS FURNACE #1 WITH EIGHT 10 MMBTU/HR (EACH), TWO 5 MMBTU/HR (EACH), TWO 2 MMBTU/HR (EACH) BURNER (94 MMBTU/HR MAX HEAT CAPACITY), AND ASSOCIATED FORMING EQUIPMENT INCLUDING FOREHEARTHS, COATING, AND CHAIN BURNERS. THIS FURNACE IS DUCTED THROUGH A STACK COMMON TO PERMIT UNITS N-1662-1, N-1662-2, N-1662-3 AND N-1662-4. THE FURNACES ARE SERVED BY THE

FOLLOWING SHARED EQUIPMENT: SOX SCRUBBER INCLUDING A LIME STORAGE SILO SERVED BY A BIN VENT FILTER, AN ELECTROSTATIC PRECIPITATOR, AND/OR FOUR TRI-MER UCF-500 CERAMIC FILTER DUST COLLECTORS

- N-1662-2-21: GLASS FURNACE #2 WITH 10 NORTH AMERICAN PRAXAIR GEN III GAS/OXYGEN BURNERS (75 MMBTU/HR MAX HEAT CAPACITY), AND ASSOCIATED FORMING EQUIPMENT INCLUDING FOREHEARTHS, COATING, AND CHAIN BURNERS. THIS FURNACE IS DUCTED THROUGH A STACK COMMON TO PERMIT UNITS N-1662-1, N-1662-2, N-1662-3 AND N-1662-4. THE FURNACES ARE SERVED BY THE FOLLOWING SHARED EQUIPMENT: SOX SCRUBBER INCLUDING A LIME STORAGE SILO SERVED BY A BIN VENT FILTER, AN ELECTROSTATIC PRECIPITATOR, AND/OR FOUR TRI-MER UCF-500 CERAMIC FILTER DUST COLLECTORS
- N-1662-3-20: GLASS FURNACE #3 WITH 10 PRAXAIR GEN III GAS/OXYGEN BURNERS AND ASSOCIATED FORMING EQUIPMENT (75 MMBTU/HR MAX HEAT CAPACITY) AND A 2700 KW ELECTRIC BOOST SYSTEM. THIS FURNACE IS DUCTED THROUGH A STACK COMMON TO PERMIT UNITS N-1662-1, N-1662-2, N-1662-3 AND N-1662-4. THE FURNACES ARE SERVED BY THE FOLLOWING SHARED EQUIPMENT: SOX SCRUBBER INCLUDING A LIME STORAGE SILO SERVED BY A BIN VENT FILTER, AN ELECTROSTATIC PRECIPITATOR, AND/OR FOUR TRI-MER UCF-500 CERAMIC FILTER DUST COLLECTORS
- N-1662-4-22: GLASS FURNACE #4 WITH 10 PRAXAIR GAS/OXYGEN BURNERS AND ASSOCIATED FORMING EQUIPMENT (90 MMBTU/HR MAX HEAT CAPACITY). THIS FURNACE IS DUCTED THROUGH A STACK COMMON TO PERMIT UNITS N-1662-1, N-1662-2, N-1662-3 AND N-1662-4. THE FURNACES ARE SERVED BY THE FOLLOWING SHARED EQUIPMENT: SOX SCRUBBER INCLUDING A LIME STORAGE SILO SERVED BY A BIN VENT FILTER, AN ELECTROSTATIC PRECIPITATOR, AND/OR FOUR TRI-MER UCF-500 CERAMIC FILTER DUST COLLECTORS

Proposed Modification:

N-1662-1-23: MODIFICATION OF GLASS FURNACE #1 WITH EIGHT 10 MMBTU/HR (EACH), TWO 5 MMBTU/HR (EACH), TWO 2 MMBTU/HR (EACH) BURNER (94 MMBTU/HR MAX HEAT CAPACITY), AND ASSOCIATED FORMING EQUIPMENT INCLUDING FOREHEARTHS, COATING, AND CHAIN BURNERS. THIS FURNACE IS DUCTED THROUGH A STACK COMMON TO PERMIT UNITS N-1662-1, N-1662-2, N-1662-3 AND N-1662-4. THE FURNACES ARE SERVED BY THE FOLLOWING SHARED EQUIPMENT: SOX SCRUBBER INCLUDING A LIME STORAGE SILO SERVED BY A BIN VENT FILTER, AN ELECTROSTATIC PRECIPITATOR, AND/OR FOUR TRI-MER UCF-500 CERAMIC FILTER DUST COLLECTORS: REDUCE PERMITTED NOX, SOX AND PM10 EMISSION LIMITS FOR DISTRICT RULE 4354 COMPLIANCE

- N-1662-2-24: MODIFICATION OF GLASS FURNACE #2 WITH 10 NORTH AMERICAN PRAXAIR GEN III GAS/OXYGEN BURNERS (75 MMBTU/HR MAX HEAT CAPACITY), AND ASSOCIATED FORMING EQUIPMENT INCLUDING FOREHEARTHS, COATING, AND CHAIN BURNERS. THIS FURNACE IS DUCTED THROUGH A STACK COMMON TO PERMIT UNITS N-1662-1, N-1662-2, N-1662-3 AND N-1662-4. THE FURNACES ARE SERVED BY THE FOLLOWING SHARED EQUIPMENT: SOX SCRUBBER INCLUDING A LIME STORAGE SILO SERVED BY A BIN VENT FILTER, AN ELECTROSTATIC PRECIPITATOR, AND/OR FOUR TRI-MER UCF-500 CERAMIC FILTER DUST COLLECTORS: REDUCE PERMITTED NOX, SOX AND PM10 EMISSION LIMITS FOR DISTRICT RULE 4354 COMPLIANCE
- N-1662-3-23: MODIFICATION OF GLASS FURNACE #3 WITH 10 PRAXAIR GEN III GAS/OXYGEN BURNERS AND ASSOCIATED FORMING EQUIPMENT (75 MMBTU/HR MAX HEAT CAPACITY) AND A 2700 KW ELECTRIC BOOST SYSTEM. THIS FURNACE IS DUCTED THROUGH A STACK COMMON TO PERMIT UNITS N-1662-1, N-1662-2, N-1662-3 AND N-1662-4. THE FURNACES ARE SERVED BY THE FOLLOWING SHARED EQUIPMENT: SOX SCRUBBER INCLUDING A LIME STORAGE SILO SERVED BY A BIN VENT FILTER, AN ELECTROSTATIC PRECIPITATOR, AND/OR FOUR TRI-MER UCF-500 CERAMIC FILTER DUST COLLECTORS: REDUCE PERMITTED NOX, SOX AND PM10 EMISSION LIMITS FOR DISTRICT RULE 4354 COMPLIANCE
- N-1662-4-25: MODIFICATION OF GLASS FURNACE #4 WITH 10 PRAXAIR GAS/OXYGEN BURNERS AND ASSOCIATED FORMING EQUIPMENT (90 MMBTU/HR MAX HEAT CAPACITY). THIS FURNACE IS DUCTED THROUGH A STACK COMMON TO PERMIT UNITS N-1662-1, N-1662-2, N-1662-3 AND N-1662-4. THE FURNACES ARE SERVED BY THE FOLLOWING SHARED EQUIPMENT: SOX SCRUBBER INCLUDING A LIME STORAGE SILO SERVED BY A BIN VENT FILTER, AN ELECTROSTATIC PRECIPITATOR, AND/OR FOUR TRI-MER UCF-500 CERAMIC FILTER DUST COLLECTORS: REDUCE PERMITTED NOX, SOX AND PM10 EMISSION LIMITS FOR DISTRICT RULE 4354 COMPLIANCE

Post-Project Equipment Description:

N-1662-1-23: GLASS FURNACE #1 WITH EIGHT 10 MMBTU/HR (EACH), TWO 5 MMBTU/HR (EACH), TWO 2 MMBTU/HR (EACH) BURNER (94 MMBTU/HR MAX HEAT CAPCITY). AND ASSOCIATED FORMING **EQUIPMENT** INCLUDING FOREHEARTHS, COATING, AND CHAIN BURNERS. THIS FURNACE IS DUCTED THROUGH A STACK COMMON TO PERMIT UNITS N-1662-1, N-1662-2. N-1662-3 AND N-1662-4. THE FURNACES ARE SERVED BY THE FOLLOWING SHARED EQUIPMENT: SOX SCRUBBER INCLUDING A LIME STORAGE SILO SERVED BY A BIN VENT FILTER, AN ELECTROSTATIC PRECIPITATOR. AND/OR FOUR TRI-MER UCF-500 CERAMIC FILTER DUST **COLLECTORS**

- N-1662-2-24: GLASS FURNACE #2 WITH 10 NORTH AMERICAN PRAXAIR GEN III GAS/OXYGEN BURNERS (75 MMBTU/HR MAX HEAT CAPACITY), AND ASSOCIATED FORMING EQUIPMENT INCLUDING FOREHEARTHS, COATING, AND CHAIN BURNERS. THIS FURNACE IS DUCTED THROUGH A STACK COMMON TO PERMIT UNITS N-1662-1, N-1662-2, N-1662-3 AND N-1662-4. THE FURNACES ARE SERVED BY THE FOLLOWING SHARED EQUIPMENT: SOX SCRUBBER INCLUDING A LIME STORAGE SILO SERVED BY A BIN VENT FILTER, AN ELECTROSTATIC PRECIPITATOR, AND/OR FOUR TRI-MER UCF-500 CERAMIC FILTER DUST COLLECTORS
- N-1662-3-23: GLASS FURNACE #3 WITH 10 PRAXAIR GEN III GAS/OXYGEN BURNERS AND ASSOCIATED FORMING EQUIPMENT (75 MMBTU/HR MAX HEAT CAPACITY) AND A 2700 KW ELECTRIC BOOST SYSTEM. THIS FURNACE IS DUCTED THROUGH A STACK COMMON TO PERMIT UNITS N-1662-1, N-1662-2, N-1662-3 AND N-1662-4. THE FURNACES ARE SERVED BY THE FOLLOWING SHARED EQUIPMENT: SOX SCRUBBER INCLUDING A LIME STORAGE SILO SERVED BY A BIN VENT FILTER, AN ELECTROSTATIC PRECIPITATOR, AND/OR FOUR TRI-MER UCF-500 CERAMIC FILTER DUST COLLECTORS
- N-1662-4-25: GLASS FURNACE #4 WITH 10 PRAXAIR GAS/OXYGEN BURNERS AND ASSOCIATED FORMING EQUIPMENT (90 MMBTU/HR MAX HEAT CAPACITY). THIS FURNACE IS DUCTED THROUGH A STACK COMMON TO PERMIT UNITS N-1662-1, N-1662-2, N-1662-3 AND N-1662-4. THE FURNACES ARE SERVED BY THE FOLLOWING SHARED EQUIPMENT: SOX SCRUBBER INCLUDING A LIME STORAGE SILO SERVED BY A BIN VENT FILTER, AN ELECTROSTATIC PRECIPITATOR, AND/OR FOUR TRI-MER UCF-500 CERAMIC FILTER DUST COLLECTORS

VI. Emission Control Technology Evaluation

The glass melting furnaces emit NOx, SOx, PM₁₀, CO and VOC emissions. NOx is reduced using oxy-fuel fired combustors, SOx is reduced by using a dry (calcium hydroxide) scrubber, and PM₁₀ is reduced using a ceramic dust collector (CDC) and/or an electrostatic precipitator (ESP) system. The company will continue to use the existing emission control technologies.

VII. General Calculations

A. Assumptions

Assumptions will be stated as they are made during the evaluation.

B. Emission Factors

1. Pre-Project Emission Factors (EF1)

N-1662-1-21: Glass Melting Furnace #1

EF in permit N-1662-1-21 are summarized below:

Pollutant	EF1			
NOx	1.3 lb/ton of glass produced*			
	0.95 lb/ton of glass produced*			
SOx	(≥25% by wt. mixed color cullet)			
SUX	0.79 lb/ton of glass produced*			
	(<25% by wt. mixed color cullet)			
	0.45 lb/ton of glass produced – steady state			
PM ₁₀	0.71 lb/ton of glass produced – during full or partial emission			
	control system bypass episode for routine maintenance			
CO	0.04 lb/ton of glass produced			
VOC	0.02 lb/ton of glass produced			

^{*}Limit "over a rolling 30-day average"

N-1662-2-21: Glass Melting Furnace #2

EF in permit N-1662-2-21 are summarized below:

Pollutant	EF1			
NOx	1.3 lb/ton of glass produced*			
	0.95 lb/ton of glass produced*			
SOx	(≥25% by wt. mixed color cullet)			
30%	0.79 lb/ton of glass produced*			
	(<25% by wt. mixed color cullet)			
	0.45 lb/ton of glass produced – steady state			
PM ₁₀	0.71 lb/ton of glass produced – during full or partial emission			
	control system bypass episode for routine maintenance			
CO	0.2 lb/ton of glass produced			
VOC	0.02 lb/ton of glass produced			

^{*}Limit "over a rolling 30-day average"

N-1662-3-20: Glass Melting Furnace #3

EF in permit N-1662-3-20 are summarized below:

Pollutant	EF1			
NOx	1.3 lb/ton of glass produced*			
	0.95 lb/ton of glass produced*			
SOx	(≥25% by wt. mixed color cullet)			
30x	0.79 lb/ton of glass produced*			
	(<25% by wt. mixed color cullet)			
	0.45 lb/ton of glass produced – steady state			
PM ₁₀	0.71 lb/ton of glass produced – during full or partial emission			
	control system bypass episode for routine maintenance			
CO	0.01 lb/ton of glass produced			
VOC	0.02 lb/ton of glass produced			

^{*}Limit "over a rolling 30-day average"

N-1662-4-22: Glass Melting Furnace #4

EF in permit N-1662-4-22 are summarized below:

Pollutant	EF1			
NOx	1.3 lb/ton of glass produced*			
	0.95 lb/ton of glass produced*			
SOx	(≥25% by wt. mixed color cullet)			
30%	0.79 lb/ton of glass produced*			
	(<25% by wt. mixed color cullet)			
	0.45 lb/ton of glass produced – steady state			
PM ₁₀	0.71 lb/ton of glass produced – during full or partial emission control system bypass episode for routine maintenance			
CO	0.2 lb/ton of glass produced			
VOC	0.02 lb/ton of glass produced			

^{*}Limit "over a rolling 30-day average"

N-1662-1, '-2, '-3 & 4: Hydrated Lime Receiving & Storage

The hydrated lime storage silo is served by a bin vent filter. This silo is shared by all four glass melting furnaces. EF from receiving and storing hydrated lime are summarized below:

Pollutant	EF1 Ib-PM ₁₀ /ton of material received	Source	
PM ₁₀	0.0049	Permits N-1662-1-21, '-2-21, '-3-20 and '-4-22	

2. Post-Project Emission Factors (EF2)

N-1662-1-23: Glass Melting Furnace #1

To be a second with a second s				
Pollutant	EF2			
NOx	0.99 lb/ton of glass produced*			
SOx	0.77 lb/ton of glass produced*			
	0.18 lb/ton of glass produced – steady state**			
PM ₁₀ 0.71 lb/ton of glass produced – during full or partial control system bypass episode for routine mainte				
CO	0.04 lb/ton of glass produced			
VOC	0.02 lb/ton of glass produced			

^{*}Limit "over a rolling 30-day average"; **block 24-hour average

N-1662-2-23: Glass Melting Furnace #2

Pollutant	EF2			
NOx	0.99 lb/ton of glass produced*			
SOx	0.77 lb/ton of glass produced*			
	0.18 lb/ton of glass produced – steady state**			
PM ₁₀	0.71 lb/ton of glass produced – during full or partial emission control system bypass episode for routine maintenance			
CO	0.2 lb/ton of glass produced			
VOC	0.02 lb/ton of glass produced			

^{*}Limit "over a rolling 30-day average"; **block 24-hour average

N-1662-3-22: Glass Melting Furnace #3

Pollutant	EF2			
NOx	0.99 lb/ton of glass produced*			
SOx	0.77 lb/ton of glass produced*			
	0.18 lb/ton of glass produced – steady state**			
PM ₁₀	0.71 lb/ton of glass produced – during full or partial emission			
	control system bypass episode for routine maintenance			
CO	0.01 lb/ton of glass produced			
VOC	0.02 lb/ton of glass produced			

^{*}Limit "over a rolling 30-day average"; **block 24-hour average

N-1662-4-24: Glass Melting Furnace #4

14 1002 1 21. Clade Welling Lamado III				
Pollutant	EF2			
NOx	0.99 lb/ton of glass produced*			
SOx	0.77 lb/ton of glass produced*			
	0.18 lb/ton of glass produced – steady state**			
PM ₁₀	0.71 lb/ton of glass produced – during full or partial emission			
	control system bypass episode for routine maintenance			
CO	0.2 lb/ton of glass produced			
VOC	0.02 lb/ton of glass produced			

^{*}Limit "over a rolling 30-day average"; **block 24-hour average

N-1662-1, '-2, '-3 & 4: Hydrated Lime Receiving & Storage

The applicant is not proposing any changes to the hydrated lime storage silo. Therefore, EF2 will be same as EF1.

C. Calculations

1. Pre-Project Potential to Emit (PE1)

N-1662-1-21: Glass Melting Furnace #1

ATC N-1662-1-21 limits glass production to 520.1 tons/day.

PE1 (lb/day) = EF1 (lb/ton of glass) x Process rate (tons/day)

Pollutant	EF1	Process rate (tons/day)	PE1 (lb/day)
NOx	1.3 lb/ton of glass produced	520.1	676.1
SOv	0.95 lb/ton of glass produced (≥25% by wt. mixed color cullet)	520.1	494.1
SOx	0.79 lb/ton of glass produced (<25% by wt. mixed color cullet)	520.1	410.9
	0.45 lb/ton of glass produced – steady state	520.1	234.0
PM ₁₀	0.71 lb/ton of glass produced – during full or partial emission control system bypass episode for routine maintenance	520.1	369.3
CO	0.04 lb/ton of glass produced	520.1	20.8
VOC	0.02 lb/ton of glass produced	520.1	10.4

For PM₁₀ emissions, the maximum permitted emission control system by-pass time is 144 hr/yr (6 days/yr). Thus, worst-case emission would occur if the unit operate 6 days in emission control system by-pass mode and 359 days in normal mode.

PE1 (lb/yr) = EF1 (lb/ton of glass) x Process rate (tons/day) x Op. days (days/yr)

Pollutant	EF1	Process rate (tons/day)	Op. days (day/yr)	PE1 (lb/yr)
NOx	1.3 lb/ton of glass produced	520.1	365	246,787
SOx	0.95 lb/ton of glass produced (≥25% by wt. mixed color cullet)	520.1	365	180,345
	0.79 lb/ton of glass produced (<25% by wt. mixed color cullet)	520.1	365	149,971
	0.45 lb/ton of glass produced – steady state	520.1	359	84,022
PM ₁₀	0.71 lb/ton of glass produced – during full or partial emission control system bypass episode for routine maintenance	520.1	6	2,216
	TOTAL			86,238
CO	0.04 lb/ton of glass produced	520.1	365	7,593
VOC	0.02 lb/ton of glass produced	520.1	365	3,797

Note that this permit also limits quarterly PM_{10} emissions to the following: Q1: 22,936 lb, Q2: 23, 190 lb, Q3: 23,445 lb, and Q4: 23,445 lb.

N-1662-2-21: Glass Melting Furnace #2

ATC N-1662-2-21 limits glass production to 430 tons/day.

PE1 (lb/day) = EF1 (lb/ton of glass) x Process rate (tons/day)

Pollutant	EF1	Process rate (tons/day)	PE1 (lb/day)
NOx	1.3 lb/ton of glass produced	430	559.0
SOx	0.95 lb/ton of glass produced (≥25% by wt. mixed color cullet)	430	408.5
SOX	0.79 lb/ton of glass produced (<25% by wt. mixed color cullet)	430	339.7
	0.45 lb/ton of glass produced – steady state	430	193.5
PM ₁₀	0.71 lb/ton of glass produced – during full or partial emission control system bypass episode for routine maintenance	430	305.3
CO	0.2 lb/ton of glass produced	430	86.0
VOC	0.02 lb/ton of glass produced	430	8.6

For PM₁₀ emissions, the maximum permitted emission control system by-pass time is 144 hr/yr (6 days/yr). Thus, worst-case emission would occur if the unit operate 6 days in emission control system by-pass mode and 359 days in normal mode.

PE1 (lb/yr) = EF1 (lb/ton of glass) x Process rate (tons/day) x Op. days (days/yr)

Pollutant	EF1	Process rate (tons/day)	Op. days (day/yr)	PE1 (lb/yr)
NOx	1.3 lb/ton of glass produced	430	365	204,035
SOx	0.95 lb/ton of glass produced (≥25% by wt. mixed color cullet)	430	365	149,103
30%	0.79 lb/ton of glass produced (<25% by wt. mixed color cullet)	430	365	123,991
	0.45 lb/ton of glass produced – steady state	430	359	69,467
PM ₁₀	0.71 lb/ton of glass produced – during full or partial emission control system bypass episode for routine maintenance	430	6	1,832
	TOTAL			71,299
CO	0.2 lb/ton of glass produced	430	365	31,390
VOC	0.02 lb/ton of glass produced	430	365	3,139

N-1662-3-20: Glass Melting Furnace #3

ATC N-1662-3-20 limits glass production to 430 tons/day.

PE1 (lb/day) = EF1 (lb/ton of glass) x Process rate (tons/day)

Pollutant	EF1	Process rate (tons/day)	PE1 (lb/day)
NOx	1.3 lb/ton of glass produced	430	559.0
SOx	0.95 lb/ton of glass produced (≥25% by wt. mixed color cullet)	430	408.5
30x	0.79 lb/ton of glass produced (<25% by wt. mixed color cullet)	430	339.7
	0.45 lb/ton of glass produced – steady state	430	193.5
PM ₁₀	0.71 lb/ton of glass produced – during full or partial emission control system bypass episode for routine maintenance	430	305.3
CO	0.01 lb/ton of glass produced	430	4.3
VOC	0.02 lb/ton of glass produced	430	8.6

For PM₁₀ emissions, the maximum permitted emission control system by-pass time is 144 hr/yr (6 days/yr). Thus, worst-case emission would occur if the unit operate 6 days in emission control system by-pass mode and 359 days in normal mode.

PE1 (lb/yr) = EF1 (lb/ton of glass) x Process rate (tons/day) x Op. days (days/yr)

Pollutant	EF1	Process rate (tons/day)	Op. days (day/yr)	PE1 (lb/yr)
NOx	1.3 lb/ton of glass produced	430	365	204,035
SOx	0.95 lb/ton of glass produced (≥25% by wt. mixed color cullet)	430	365	149,103
30x	0.79 lb/ton of glass produced (<25% by wt. mixed color cullet)	430	365	123,991
	0.45 lb/ton of glass produced – steady state	430	359	69,467
PM ₁₀	0.71 lb/ton of glass produced – during full or partial emission control system bypass episode for routine maintenance	430	6	1,832
	TOTAL			71,299
CO	0.01 lb/ton of glass produced	430	365	1,570
VOC	0.02 lb/ton of glass produced	430	365	3,139

N-1662-4-22: Glass Melting Furnace #4

ATC N-1662-4-22 limits glass production to 637.9 tons/day. PE1 (lb/day) = EF1 (lb/ton of glass) x Process rate (tons/day)

Pollutant	EF1	Process rate (tons/day)	PE1 (lb/day)
NOx	1.3 lb/ton of glass produced	637.9	829.3
SOV	0.95 lb/ton of glass produced (≥25% by wt. mixed color cullet)	637.9	606.0
SOx	0.79 lb/ton of glass produced (<25% by wt. mixed color cullet)	637.9	503.9
	0.45 lb/ton of glass produced – steady state	637.9	287.1
PM ₁₀	0.71 lb/ton of glass produced – during full or partial emission control system bypass episode for routine maintenance	637.9	452.9
CO	0.2 lb/ton of glass produced	637.9	127.6
VOC	0.02 lb/ton of glass produced	637.9	12.8

PE1 (lb/yr) = EF1 (lb/ton of glass) x Process rate (tons/day) x Op. days (days/yr)

Pollutant	EF1	Process rate (tons/day)	Op. days (day/yr)	PE1 (lb/yr)
NOx	1.3 lb/ton of glass produced	637.9	365	302,684
SOx	0.95 lb/ton of glass produced (≥25% by wt. mixed color cullet)	637.9	365	221,192
30%	0.79 lb/ton of glass produced (<25% by wt. mixed color cullet)	637.9	365	183,938
	0.45 lb/ton of glass produced – steady state	637.9	359	103,053
PM ₁₀	0.71 lb/ton of glass produced – during full or partial emission control system bypass episode for routine maintenance	637.9	6	2,717
	TOTAL			105,770
CO	0.2 lb/ton of glass produced	637.9	365	46,567
VOC	0.02 lb/ton of glass produced	637.9	365	4,657

N-1662-1, '-2, '-3 & 4: Hydrated Lime Receiving & Storage

The existing permit limits hydrated lime receiving rate to 65 tons/day and 110 tons/quarter.

Daily PE1 = 0.0049 lb-PM₁₀/ton x 65 tons/day

 $= 0.3 \text{ lb-PM}_{10}/\text{day}$

Annual PE1 = $0.0049 \text{ lb-PM}_{10}/\text{ton x } 110 \text{ tons/qtr x } 4 \text{ qtr/yr}$

= 2 lb-PM₁₀/year

2. Post-Project Potential to Emit (PE2)

N-1662-1-23

The applicant has proposed to retain production rate at 520.1 tons/day.

PE2 (lb/day) = EF2 (lb/ton of glass) x Process rate (tons/day)

Pollutant	EF2	Process rate (tons/day)	PE2 (lb/day)
NOx	0.99 lb/ton of glass produced	520.1	514.9
SOx	0.77 lb/ton of glass produced	520.1	400.5
	0.18 lb/ton of glass produced – steady state	520.1	93.6
PM ₁₀	0.71 lb/ton of glass produced – during full or partial emission control system bypass episode for routine maintenance	520.1	369.3
CO	0.04 lb/ton of glass produced	520.1	20.8
VOC	0.02 lb/ton of glass produced	520.1	10.4

PE2 (lb/yr) = EF2 (lb/ton of glass) x Process rate (tons/day) x Op. days (days/yr)

Pollutant	EF2	Process rate (tons/day)	Op. days (day/yr)	PE2 (lb/yr)
NOx	0.99 lb/ton of glass produced	520.1	365	187,938
SOx	0.77 lb/ton of glass produced	520.1	365	146,174
	0.18 lb/ton of glass produced – steady state	520.1	359	33,609
PM ₁₀	0.71 lb/ton of glass produced – during full or partial emission control system bypass episode for routine maintenance	520.1	6	2,216
	TOTAL			35,825
CO	0.04 lb/ton of glass produced	520.1	365	7,593
VOC	0.02 lb/ton of glass produced	520.1	365	3,797

^{*}Lime storage silo is shared among all four furnaces. Total PM10 emissions from this silo are counted under permit N-1662-1.

Note that this permit also limits quarterly PM₁₀ emissions to the following: Q1: 22,936 lb, Q2: 23, 190 lb, Q3: 23,445 lb, and Q4: 23,445 lb.

N-1662-2-24

The applicant has proposed to retain the existing production rate of 430 tons/day.

PE2 (lb/day) = EF2 (lb/ton of glass) x Process rate (tons/day)

Pollutant	EF2	Process rate (tons/day)	PE2 (lb/day)
NOx	0.99 lb/ton of glass produced	430	425.7
SOx	0.77 lb/ton of glass produced	430	331.1
	0.18 lb/ton of glass produced – steady state	430	77.4
PM10	0.71 lb/ton of glass produced – during full or partial emission control system bypass episode for routine maintenance	430	305.3
CO	0.2 lb/ton of glass produced	430	86.0
VOC	0.02 lb/ton of glass produced	430	8.6

PE2 (lb/yr) = EF2 (lb/ton of glass) x Process rate (tons/day) x Op. days (days/yr)

Pollutant	EF2	Process rate (tons/day)	Op. days (day/yr)	PE2 (lb/yr)
NOx	0.99 lb/ton of glass produced	430	365	155,381
SOx	0.77 lb/ton of glass produced	430	365	120,852
	0.18 lb/ton of glass produced – steady state	430	359	27,787
PM ₁₀	0.71 lb/ton of glass produced – during full or partial emission control system bypass episode for routine maintenance	430	6	1,832
	TOTAL			29,619
CO	0.2 lb/ton of glass produced	430	365	31,390
VOC	0.02 lb/ton of glass produced	430	365	3,139

N-1662-3-23

The applicant has proposed to retain the existing production rate of 430 tons/day.

PE2 (lb/day) = EF2 (lb/ton of glass) x Process rate (tons/day)

Pollutant	EF2	Process rate (tons/day)	PE2 (lb/day)
NOx	0.99 lb/ton of glass produced	430	425.7
SOx	0.77 lb/ton of glass produced	430	331.1
	0.18 lb/ton of glass produced – steady state	430	77.4
PM ₁₀	0.71 lb/ton of glass produced – during full or partial emission control system bypass episode for routine maintenance	430	305.3
CO	0.01 lb/ton of glass produced	430	4.3
VOC	0.02 lb/ton of glass produced	430	8.6

PE2 (lb/yr) = EF2 (lb/ton of glass) x Process rate (tons/day) x Op. days (days/yr)

Pollutant	EF2	Process rate (tons/day)	Op. days (day/yr)	PE2 (lb/yr)
NOx	0.99 lb/ton of glass produced	430	365	155,381
SOx	0.77 lb/ton of glass produced	430	365	120,852
	0.18 lb/ton of glass produced – steady state	430	359	27,787
PM ₁₀	0.71 lb/ton of glass produced – during full or partial emission control system bypass episode for routine maintenance	430	6	1,832
	TOTAL	-		29,619
CO	0.01 lb/ton of glass produced	430	365	1,570
VOC	0.02 lb/ton of glass produced	430	365	3,139

N-1662-4-25

The applicant has proposed to retain the existing glass production rate of 637.9 tons/day.

PE2 (lb/day) = EF2 (lb/ton of glass) x Process rate (tons/day)

Pollutant	EF2	Process rate (tons/day)	PE2 (lb/day)
NOx	0.99 lb/ton of glass produced	637.9	631.5
SOx	0.77 lb/ton of glass produced	637.9	491.2
	0.18 lb/ton of glass produced – steady state	637.9	114.8
PM ₁₀	0.71 lb/ton of glass produced – during full or partial emission control system bypass episode for routine maintenance	637.9	452.9
CO	0.2 lb/ton of glass produced	637.9	127.6
VOC	0.02 lb/ton of glass produced	637.9	12.8

PE2 (lb/yr) = EF2 (lb/ton of glass) x Process rate (tons/day) x Op. days (days/yr)

Pollutant	EF2	Process rate (tons/day)	Op. days (day/yr)	PE2 (lb/yr)
NOx	0.99 lb/ton of glass produced	637.9	365	230,505
SOx	0.77 lb/ton of glass produced	637.9	365	179,282
	0.18 lb/ton of glass produced – steady state	637.9	359	41,221
PM10	0.71 lb/ton of glass produced – during full or partial emission control system bypass episode for routine maintenance	637.9	6	2,717
	TOTAL			43,938
CO	0.2 lb/ton of glass produced	637.9	365	46,567
VOC	0.02 lb/ton of glass produced	637.9	365	4,657

N-1662-1, '-2, '-3 & 4: Hydrated Lime Receiving & Storage

The applicant wants to retain the exiting hydrated lime receiving rate limits to 65 tons/day and 110 tons/quarter.

Daily PE2 =
$$0.0049 \text{ lb-PM}_{10}/\text{ton x } 65 \text{ tons/day}$$

= $0.3 \text{ lb-PM}_{10}/\text{day}$

Annual PE2=
$$0.0049$$
 lb-PM₁₀/ton x 110 tons/qtr x 4 qtr/yr = 2 lb-PM₁₀/year

3. Pre-Project Stationary Source Potential to Emit (SSPE1)

Pursuant to District Rule 2201, the SSPE1 is the Potential to Emit (PE) from all units with valid Authorities to Construct (ATC) or Permits to Operate (PTO) at the Stationary Source and the quantity of Emission Reduction Credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions (AER) that have occurred at the source, and which have not been used on-site.

The SSPE1 can be calculated by adding the PE1 from all units with valid ATCs or PTOs and the sum of the ERCs that have been banked at the source and which have not been used on-site (Totalerc).

Except for the units under this project, the potential emissions for each permit unit are taken from their respective permitting project.

		SSPE1 (lb/	year)		
Permit Unit/ERC	NO _X	SO _X	PM ₁₀	СО	VOC
ATC N-1662-1-21	246,787	180,345	86,238	7,593	3,797
N-1662-2-21	204,035	149,103	71,299	31,390	3,139
N-1662-3-20	204,035	149,103	71,299	1,570	3,139
N-1662-4-22	302,684	221,192	105,770	46,567	4,657
Hydrated lime receiving & storage listed in N-1662-1, '-2, '-3 & 4	0	0	2	0	0
ATC N-1662-7-8	0	0	11	0	0
N-1662-8-11	1,003	1,537	11,531	766	50
N-1662-10-5	642	0	31	195	73
N-1662-11-5	642	0	31	195	73
N-1662-12-5	642	0	31	195	73
N-1662-14-13	0	0	59,420	0	0
N-1662-15-4	65	5	14	270	10
N-1662-17-1	3,197	125	333	3,679	241
N-1662-18-1	3,197	125	333	3,679	241
N-1662-19-5	0	0	0	0	219
N-1662-21-2	3,197	125	333	3,679	241
N-1662-22-2	3,197	125	333	3,679	241
N-1662-23-2	3,197	125	333	3,679	241
N-1662-25-2	122	91	8	559	252
ATC N-1662-26-0	0	0	146	0	0
SSPE1 _{Permit Unit}	976,642	702,001	407,496	107,695	16,687
ERC N-966-2	229,479	-	-	-	-
ERC N-1563-2	231,282	-	-	-	-
ERC N-1510-2	1,459	-	-	-	-
ERC N-56-3	-	-	-	2,044	-
ERC N-106-3	-	-	-	3,427	-
ERC N-1583-4	-	-	58,032	-	-
Total _{ERC}	462,220	0	58,032	5,471	0
SSPE1 _{Total}	1,438,862	702,001	465,528	113,166	16,687

4. Post-Project Stationary Source Potential to Emit (SSPE2)

Pursuant to District Rule 2201, the SSPE2 is the PE from all units with valid ATCs or PTOs at the Stationary Source and the quantity of ERCs which have been banked since September 19, 1991 for AER that have occurred at the source, and which have not been used on-site.

	SSPE2 (lb/year)					
Permit Unit/ERC	NO _X	SO _X	PM ₁₀	СО	VOC	
ATC N-1662-1-23	187,938	146,174	35,825	7,593	3,797	
ATC N-1662-2-24	155,381	120,852	29,619	31,390	3,139	
ATC N-1662-3-23	155,381	120,852	29,619	1,570	3,139	
ATC N-1662-4-25	230,505	179,282	43,938	46,567	4,657	
Hydrated lime receiving & storage listed in N-1662-1, '-2, '-3 & 4	0	0	2	0	0	
ATC N-1662-7-8	0	0	11	0	0	
N-1662-8-11	1,003	1,537	11,531	766	50	
N-1662-10-5	642	0	31	195	73	
N-1662-11-5	642	0	31	195	73	
N-1662-12-5	642	0	31	195	73	
N-1662-14-13	0	0	59,420	0	0	
N-1662-15-4	65	5	14	270	10	
N-1662-17-1	3,197	125	333	3,679	241	
N-1662-18-1	3,197	125	333	3,679	241	
N-1662-19-5	0	0	0	0	219	
N-1662-21-2	3,197	125	333	3,679	241	
N-1662-22-2	3,197	125	333	3,679	241	
N-1662-23-2	3,197	125	333	3,679	241	
N-1662-25-2	122	91	8	559	252	
ATC N-1662-26-0	0	0	146	0	0	
SSPE2 _{Permit Unit}	748,306	569,418	211,891	107,695	16,687	
ERC N-966-2	229,479	-	-	-	-	
ERC N-1563-2	231,282	-	-	-	-	
ERC N-1510-2	1,459	-	-	-	-	
ERC N-56-3	-	-	-	2,044	-	
ERC N-106-3	-	-	-	3,427	-	
ERC N-1583-4	-	-	58,032	-	-	
Total _{ERC}	462,220	0	58,032	5,471	0	
SSPE2 _{Total}	1,210,526	569,418	269,923	113,166	16,687	

5. Major Source Determination

Rule 2201 Major Source Determination:

Pursuant to District Rule 2201, a Major Source is a stationary source with a SSPE2 equal to or exceeding one or more of the following threshold values. For the purposes of determining major source status the following shall not be included:

- any ERCs associated with the stationary source
- Emissions from nonroad IC engines (i.e. IC engines at a particular site at the facility for less than 12 months), pursuant to the Clean Air Act, Title 3, Section 302, US Codes 7602(j) and (z)
- Fugitive emissions, except for the specific source categories specified in 40 CFR 70.2

Rule 2201 Major Source Determination (lb/year)						
NO _X SO _X PM ₁₀ PM _{2.5} CO VOC						voc
SSPE1	976,642	702,001	407,496	407,496	107,695	16,687
SSPE2	748,306	569,418	211,891	211,890	107,695	16,687
Major Source Threshold	20,000	140,000	140,000	140,000	200,000	20,000
Major Source?	Yes	Yes	Yes	Yes	No	No

As seen in the table above, this facility is an existing Major Source for NO_X, SO_X, PM₁₀, and PM_{2.5} emissions and will remain a Major Source for these pollutants after implementing ATCs under this project.

Rule 2410 Major Source Determination:

The facility or the equipment evaluated under this project is not listed as one of the categories specified in 40 CFR 52.21 (b)(1)(iii). Therefore the PSD Major Source threshold is 250 tpy for any regulated NSR pollutant.

PSD Major Source Determination (tons/year)						
NO ₂ VOC SO ₂ CO PM PM ₁₀						PM ₁₀
Estimated Facility PE before Project Increase*	488	8	351	54	204	204
PSD Major Source Thresholds	250	250	250	250	250	250
PSD Major Source?	Yes	No	Yes	No	No	No

^{*} These values are taken from the SSPE1 table, excluding ERCs.

As seen in the table above, this facility is an existing PSD major source for at least one pollutant.

6. Baseline Emissions (BE)

The BE calculation (in lb/year) is performed pollutant-by-pollutant for each unit within the project to calculate, if applicable, the amount of offsets required.

Pursuant to District Rule 2201, BE = PE1 for:

- Any unit located at a non-Major Source,
- Any Highly-Utilized Emissions Unit, located at a Major Source,
- Any Fully-Offset Emissions Unit, located at a Major Source, or
- Any Clean Emissions Unit, located at a Major Source.

otherwise,

BE = Historic Actual Emissions (HAE), calculated pursuant to District Rule 2201.

N-1662-1, '-2, '-3 & '-4

The proposed project is exempt from offset requirements per section 4.6.8 of Rule 2201 (refer to discussion in Section VIII under Rule 2201 of this document). Therefore, BE calculations are not required.

7. SB 288 Major Modification

SB 288 Major Modification is defined in 40 CFR Part 51.165 as "any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act."

Per section VII.C.5 above, this facility is a Major source for NO_X, SO_X, PM_{2.5} & PM₁₀. Thus, the project's PE2 is compared to the SB 288 Major Modification Threshold in the following table in order to determine if the SB 288 Major Modification calculation is required. Note that there are not any PM_{2.5} threshold in Table 3-5 of Rule 2201. As such, PM_{2.5} is not listed in the table below.

	SB 288 Major Modification Thresholds					
Pollutant	Project PE2* (lb/year)	SB 288 Major Modification Calculation Required?				
NO _x	729,205	50,000	Yes			
SO _x	567,160	80,000	Yes			
PM ₁₀	139,001	30,000	Yes			

^{*}All four furnaces

Since the project's PE2 surpasses the SB 288 Major Modification Threshold for NOx, SOx, and PM₁₀, the Net Emissions Increase (NEI) will be compared to the SB 288 Major

Modification thresholds in order to determine if this project constitutes an SB 288 Major Modification. The NEI is the total of emission increases for every permit unit addressed in this project and is calculated as follows:

$$NEI = \sum (PE2 - AE)$$

AE =

Where: PE2 = the sum of all the PE2s for each permit unit in this project

Actual emissions, as of a particular date, shall equal the average rate, in tons per year, at which the unit actually emitted the pollutant during a consecutive 24-month period which precedes the particular date and which is representative of normal source operation. The reviewing authority shall allow the use of a different time period upon a determination that it is more representative of normal source operation.

Baseline Period:

Per guidance on page 8 of District Policy APR-1150 (1/5/21), for a specific regulated NSR pollutant, when a project involves multiple emissions units, only one consecutive 24-month period must be used to determine the baseline actual emissions for all modified emissions units.

Gallo Glass Company has provided glass production data for the past 10 year period from 2011 to 2020. Using this production data, year 2015 and 2016 was determined to be the 2 year period (24-month period) during which the facility operated most closely to the average production rate over the 10 year period of data provided by the applicant. Thus, year 2015 and 2016 data will be used in as the baseline period for this analysis.

NO_x:

Gallo Glass Company uses a CEMS to monitor and record NOx emissions. The facility has provided. The NOx emissions over the 2015 and 2016 baseline period is summarized below.

NOx Avg. Actual Emissions					
Permit#	Baseline period	AE (lb/yr)	Avg. AE (lb/yr)		
N-1662-1	2015	128,396	132,442		
IN-1002-1	2016	136,488	132,442		
N-1662-2	2015	48,160	82,990		
IN-1002-2	2016	117,820	62,990		
N-1662-3	2015	90,400	102,240		
IN-1002-3	2016	114,080	102,240		
N-1662-4	2015	146,680	151,290		
IN-1002-4	2016	155,900	101,290		

Using the PE2 from this project and the calculated AE from the above table, the NEI for NOx is calculated as follows:

$$NEI = \sum (PE2 - AE)$$

NEI for NOx					
Permit Unit	PE2 (lb/yr)	AE (lb/yr)	NEI (lb/yr)		
N-1662-1	187,938	132,442	55,496		
N-1662-2	155,381	82,990	72,391		
N-1662-3	155,381	102,240	53,141		
N-1662-4	230,505	151,290	79,215		
		NEI (total):	260,243		

SO_x:

Gallo Glass Company uses CEMS to monitor and record SOx emissions. The SOx emissions over the 2015 and 2016 baseline period is summarized below.

SOx Avg. Actual Emissions					
Permit#	Baseline period	AE (lb/yr)	Avg. AE (lb/yr)		
N-1662-1	2015	125,555	111 050		
IN-1002-1	2016	98,349	111,952		
N-1662-2	2015	42,340	74.520		
IN-1002-2	2016	106,720	74,530		
N-1662-3	2015	79,440	91,390		
N-1002-3	2016	103,340	91,390		
N 4000 4	2015	128,920	405.000		
N-1662-4	2016	141,200	135,060		

Using the PE2 from this project and the calculated AE (above table), the NEI for SOx is calculated as follows:

 $NEI = \sum (PE2 - AE)$

	NEI for SOx					
Permit Unit	PE2 (lb/yr)	AE (lb/yr)	NEI (lb/yr)			
N-1662-1	146,174	111,952	34,222			
N-1662-2	120,852	74,530	46,322			
N-1662-3	120,852	91,390	29,462			
N-1662-4	179,282	135,060	44,222			
		NEI (total):	154,228			

PM₁₀:

Gallo Glass Company provided actual production and source test data to estimate PM₁₀ emission rate over the 2015 and 2016 baseline period.

PM₁₀ Avg. Actual Emissions					
Permit#	Baseline period	AE (lb/yr)	Avg. AE (lb/yr)		
N 1660 1	2015	10,800	0.726		
N-1662-1	2016	8,672	9,736		
N-1662-2	2015	4,028	E 202		
IN-100Z-Z	2016	6,377	5,203		
N-1662-3	2015	7,559	6 967		
N-1002-3	2016	6,175	6,867		
N. 4000 4	2015	12,265	40.050		
N-1662-4	2016	8,439	10,352		

Using the PE2 from this project and the calculated AE (above table), the NEI is calculated as follows:

$$NEI = \sum (PE2 - AE)$$

	NEI for PM10					
Permit Unit	PE2 (lb/yr)	AE (lb/yr)	NEI (lb/yr)			
N-1662-1	35,825	9,736	26,089			
N-1662-2	29,619	5,203	24,416			
N-1662-3	29,619	6,867	22,752			
N-1662-4	43,938	10,352	33,586			
	NEI (total): 106,843					

In conclusion, the project's net emission increases are summarized in the following table and are compared to the SB-288 Major Modification Thresholds in the following table.

SB 288 Major Modification Determination					
Pollutant	NEI (Ib/year)	SB 288 Major Modification?			
NO _x	260,243	50,000	Yes		
SO _x	154,228	Yes			
PM ₁₀	106,843	30,000	Yes		

As seen in the able table, NEI for NOx, SOx and PM₁₀ surpassed the respective SB-288 thresholds; therefore, this project triggers an SB-288 major modification.

8. Federal Major Modification

District Rule 2201 states that a Federal Major Modification is the same as a "Major Modification" as defined in 40 CFR 51.165 and part D of Title I of the CAA.

As defined in 40 CFR 51.165, Section (a)(1)(v) and part D of Title I of the CAA, a Federal Major Modification is any physical change in or change in the method of operation of a major stationary source that would result in a significant net emissions increase of any pollutant subject to regulation under the Act. The significant net emission increase threshold for each criteria pollutant is included in Rule 2201.

The determination of Federal Major Modification is based on a two-step test. For the first step, only the emission *increases* are counted. In step 1, emission decreases can not cancel out the increases. Step 2 allows consideration of the project's net emissions increase as described in 40 CFR 51.165 and the Federal Clean Air Act Section 182 (e), as applicable.

Step 1: Project Emissions Increase

For modified existing emissions units, according to 40 CFR 51.165(a)(2)(ii)(C), the project's emission increase for each pollutant is equal to the sum of the differences between the projected actual emissions (PAE) and the baseline actual emissions (BAE). Please note that in step 1, since the District is classified as extreme non-attainment for ozone, no NOx and VOC emission decreases associated with the proposed project shall be accounted for.

Project Emissions Increase = $\sum (PAE - BAE)$

As described in 40 CFR 51.165(a)(1)(xxviii)(B), when using historical data and company's expected business activity to determine PAE, the portion of the emissions after the project that the existing unit could have accommodated (Unused Baseline Capacity, UBC) before the project (during the same 24-month baseline period used to determine BAE) and that are unrelated to the particular project (including emissions increases due to product demand growth) are to be excluded.

Otherwise, according to 40 CFR 51.165(a)(1)(xxvii)(B)(4), when determining PAE, in lieu of using the method described in 40 CFR 51.165 (a)(1)(xxviii)(B)(1)-(3), *Projected Actual Emissions*, the owner/operator may elect to use emissions unit's Potential to Emit. If appropriate projected actual emissions are not provided by the applicant, then the emissions unit's Potential to Emit is used to calculate the emissions increase.

Since the applicant has provided the data required to calculate PAE, the project emissions increase will be calculated as follows:

Project Emissions Increase = PAE - BAE - UBC, where:

PAE = Projected Actual Emissions;

BAE = Baseline Actual Emissions;

UBC = Unused baseline capacity

Projected Actual Emissions (PAE)

As indicated in previous permitting projects N-1201553 (Sept 2020) and N-1210180 (July 2021), Gallo Glass Company projects to produce glass up to 520.1 ton/day, 189,836.5 tons/yr in furnace 1 (N-1662-1); 430 tons/day, 156,950 tons/yr in furnace 2 (N-1662-2); 430 tons/day, 156,950 tons/yr in furnace 3 (N-1662-3); and 637.9 tons/day, 232,833.5 tons/yr in furnace 4 (N-1662-4). The projected actual production amount accounts for historical operational data, the company's own representations, the company's expected business activity and the company's highest projections of business activity. The projected future use accounts for expanded growth with the E&J Gallo Winery brand, expanded outside sales, and business mergers and acquisitions. Using these rates, the emissions from each furnace are as follows:

NOx, SOx:

Projected Actual Emissions = Emission Factor (lb/ton) x Projected Actual Glass Production (tons/yr)

PM₁₀:

Projected Actual Emissions = Emission Factor during full or partial emission control system bypass episode for routine maintenance x Projected Actual Glass Production (tons/yr) over 6 day period¹

Projected Actual Emissions = Emission Factor during steady state x Projected Actual Glass Production (tons/yr) over 359 days

¹ Gallo Glass Company is permitted to use full or partial PM10 emission control system for up to 144 hr/yr (6 days/yr)

Permit#	Pollutant	EF (lb/ton)	Production (tons/yr)	PAE (lb/yr)
	NOx	0.99		187,938
	SOx	0.77	189,836.5	146,174
N-1662-1		0.71*	3,120.6	2,216
	PM ₁₀	0.18**	186,715.9	33,609
		Total		35,825
	NOx	0.99	156,950	155,381
	SOx	0.77	130,930	120,852
N-1662-2	PM ₁₀	0.71*	2,580	1,832
		0.18**	154,370	27,787
		Total		29,619
	NOx	0.99	156,950	155,381
	SOx	0.77	130,930	120,852
N-1662-3		0.71*	2,580	1,832
	PM ₁₀	0.18**	154,370	27,787
		Total		29,619
	NOx	0.99	222 022 5	230,505
	SOx	0.77	232,833.5	179,282
N-1662-4		0.71*	3,827	2,717
	PM ₁₀	0.18**	229,006	41,221
		Total		44,938

^{*}EF during full or partial emission control system bypass episode for routine maintenance;

Baseline Actual Emissions (BAE)

For emission units (other than electric utility steam generating units), according to according to 40 CFR 51.165(a)(1)(xxxv)(B), the BAE are calculated as the average, in tons/year, at which the emissions unit actually emitted during any 24-month period selected by the operator within the previous 10-year period.

The Federal Major Modification Baseline Actual Emissions will be calculated utilizing information provided by the applicant. As noted in section VII.C.7 above, baseline period is found to be a two year period between 2015 and 2016 using plant production records.

Permit#	Pollutant	Baseline period	BAE (lb/yr)	Avg. BAE (lb/yr)	
	NOx	2015	128,396	122 112	
	NOX	2016	136,488	132,442	
N-1662-1	SOx	2015	125,555	111 050	
IN-1002-1		2016	98,349	111,952	
		2015	10,800	0.726	
	PM ₁₀	2016	8,672	9,736	

^{**} EF during steady state operation

Permit#	Pollutant	Baseline period	BAE (lb/yr)	Avg. BAE (lb/yr)
	NOx	2015	48,160	82,990
	INOX	2016	117,820	02,990
N-1662-2	SOx	2015	42,340	74,530
IN-1002-2	30%	2016	106,720	74,550
	PM ₁₀	2015	4,028	5,203
	F IVI10	2016	6,377	5,205
	NOx	2015	90,400	102,240
		2016	114,080	102,240
N-1662-3	SOx	2015	79,440	91,390
14-1002-3		2016	103,340	91,390
	PM ₁₀	2015	7,559	6,867
		2016	6,175	0,007
	NOx	2015	146,680	151,290
	NOX	2016	155,900	131,290
N-1662-4	SOx	2015	128,920	135,060
IN-1002-4	SUX	2016	141,200	133,000
	DM	2015	12,265	10.252
	PM ₁₀	2016	8,439	10,352

Unused Baseline Capacity (UBC)

As described in 40 CFR 51.165(a)(1)(xxviii)(B), when using historical data and company's expected business activity and highest projections of business activity to determine PAE, the portion of the emissions after the project that the existing unit could have accommodated before the project (during the same 24-month baseline period used to determine BAE) and that are unrelated to the particular project (including emissions increases due to product demand growth) are to be excluded.

As noted under project N-1201553, furnaces at this site have historically operated near their permitted emission limits for NOx and SOx as demonstrated by CEMS data. For PM₁₀ emissions, the source test data has demonstrated that the emission rate varies and has ranged from as low as 0.053 lb-PM₁₀/ton of glass pulled, up to 0.28 lb-PM₁₀/ton of glass pulled with one of the runs during that source test measuring as high as 0.47 lb-PM₁₀/ton of glass pulled. To maintain a margin of compliance when accounting for all startups, shutdowns, and malfunctions, as authorized by 40 CFR 51.165 (a)(1)(xxviii)(B)(2), the permitted emission limits will be used when calculating the emissions that the unit could have physically and legally accommodated during the baseline period.

Additionally, as noted in the table below, the furnaces have actually produced up to a combined 1,684 tons per day of glass. The following table considers the maximum operational data from each furnace based on product demand on any given day during the period used to estimate baseline period since the furnaces do not typically operate at the maximum capacity on a single day.

	Actual Production Data (tons/day)						
Date	Date N-1662-1 N-1662-2 N-1662-3 N-1662-4						
10/23/15	456	387	283	505			
10/25/15	463	381	283	502			
2/26/16	463	391	316				
2/28/16	462	389	318				
8/5/16	458	383	313	483			
*10/04/16	441	388	317	512			
Tot	tal (sum of max	values): 463+39	1+318+512 = 1,6	84			

^{*}Noted under project N-1201553

Gallo Glass Company furnaces have maximum glass pull rate design capacities of the following: Furnace 1 (520.1 tons/day), Furnace 2 (430 tons/day), Furnace 3 (430 tons/day) and Furnace 4 (637.9 tons/day). The applicant stated that the furnaces typically operate over 80% of their maximum pull capacity (1,684/2,018 = 83%) and are only limited by the facility's current demand for product (glass wine bottles). Based on the applicant's statement, there is nothing physically preventing the facility from operating each furnace at their maximum capacity, as noted above.

Further, as noted under project N-1201553, the applicant stated that the market demand for higher production rates, due to increases from internal demand (E&J Gallo Winery) or from expanded outside sales, and business mergers and acquisitions could be accommodated if the demand materialized. Additionally, since Gallo Glass Company produces containers for the E&J Gallo Winery (with an international market) and to outside customers, if disruptions in container glass supply from another facility (i.e. catastrophic plant closure) or as a whole (e.g. loss of alternate suppliers, import tariffs, global pandemics), Gallo Glass Company could easily increase production and would do so with the furnaces as they are currently permitted/configured. Therefore, if the market demand required such production, all furnaces could be operated to the maximum capacity.

Permit#	Pollutant	Max furnace design capacity production emissions lb/year
	NO _x	246,787
N-1662-1	SO _x	180,345
	PM ₁₀	86,240
	NO _x	204,035
N-1662-2	SO _x	149,103
	PM ₁₀	71,299
	NO _x	204,035
N-1662-3	SO _x	149,103
	PM ₁₀	71,299
	NO _x	302,684
N-1662-4	SO _x	221,192
	PM ₁₀	105,770

The unused baseline capacity (UBC) for this project is the difference between the emissions the units could have accommodated (maximum furnace designed capacity of production) and the baseline actual emissions as summarized in the following table:

	Unused Baseline Capacity					
Permit#	Pollutant	Max furnace design capacity production emissions lb/year	BAE (lb/yr)	UBC (lb/yr)		
	NO _x	246,787	132,442	114,345		
N-1662-1	SO _x	180,345	111,952	68,393		
	PM ₁₀	86,240	9,736	76,504		
	NO _x	204,035	82,990	121,045		
N-1662-2	SO _x	149,103	74,530	74,573		
	PM ₁₀	71,299	5,203	66,096		
	NO _x	204,035	102,240	101,795		
N-1662-3	SO _x	149,103	91,390	57,713		
	PM ₁₀	71,299	6,175	65,124		
	NO _x	302,684	151,290	151,394		
N-1662-4	SO _x	221,192	135,060	86,132		
	PM ₁₀	105,770	10,352	95,418		

<u>Project Emissions Increase For Modified Emission Units</u> Project emissions increase = $\sum (PAE - BAE - UBC)$;

Since the District is classified as extreme non-attainment for ozone, no NOx and VOC emission decreases associated with the proposed project shall be accounted for in the calculations below.

NOx:

	Project Emission Increase (lb/yr)					
Permit#	PAE (lb/yr)	BAE (lb/yr)	UBC (lb/yr)	Project emissions increase (lb/yr)		
N. 4000 4	. , ,		` '	` * '		
N-1662-1	187,938	132,442	114,345	0 (-58,849)		
N-1662-2	155,381	82,990	121,045	0 (-48,654)		
N-1662-3	155,381	102,240	101,795	0 (-48,654)		
N-1662-4	230,505	151,290	151,394	0 (-72,179)		
		0 (-228,336)				

SOx:

Project Emission Increase (lb/yr)					
Permit#	PAE (lb/yr)	BAE (lb/yr)	UBC (lb/yr)	Project emissions increase (lb/yr)	
N-1662-1	146,174	129,826	50,519	0 (-34,171)	
N-1662-2	120,852	111,952	68,393	0 (-59,493)	
N-1662-3	120,852	91,390	57,713	0 (-28,251)	
N-1662-4	207,322	135,060	86,132	0 (-13,870)	
		– BAE – UBC)	0 (-135,785)		

PM₁₀:

	Project Emission Increase (lb/yr)						
Permit#	PAE	BAE	UBC	Project emissions increase			
r Gillium	(lb/yr)	(lb/yr)	(lb/yr)	(lb/yr)			
N-1662-1	35,825	9,736	76,504	0 (-50,415)			
N-1662-2	29,619	5,203	66,096	0 (-41,680)			
N-1662-3	29,619	6,175	65,124	0 (-41,680)			
N-1662-4	43,938	10,352	95,418	0 (-61,832)			
		0 (-195,607)					

In conclusion, the project's total emission increases are summarized in the following table and are compared to the Federal Major Modification Thresholds in the following table. Note that conservatively, it is assumed that all PM₁₀ is PM_{2.5}.

Federal Major Modification Thresholds for Emission Increases					
Pollutant	Total Project Emissions Increases (lb/year) Thresholds (lb/year) Federal M Modificati				
NO _x *	0	0	No		
SO _x	0	80,000	No		
PM ₁₀	0	30,000	No		
PM _{2.5}	0	20,000	No		

^{*}If there is any emission increases in NO_x or VOC, this project is a Federal Major Modification and no further analysis is required;

As seen in the table above, since none of the Federal Major Modification Thresholds are being surpassed with this project, this project does not constitute a Federal Major Modification, step 2 is not required and no further discussion is required.

9. Rule 2410 - Prevention of Significant Deterioration (PSD) Applicability Determination

Rule 2410 applies to any pollutant regulated under the Clean Air Act, except those for which the District has been classified nonattainment. The pollutants which must be addressed in the PSD applicability determination for sources located in the SJV and which are emitted in this project are: (See 52.21 (b) (23) definition of significant)

- NO2 (as a primary pollutant)
- SO2 (as a primary pollutant)
- CO
- PM
- PM₁₀

I. Project Location Relative to Class 1 Area

As demonstrated in the "PSD Major Source Determination" Section above, the facility was determined to be a existing PSD Major Source. Because the project is not located within 10 km (6.2 miles) of a Class 1 area – modeling of the emission increase is not required to determine if the project is subject to the requirements of Rule 2410.

II. Project Emission Increase – Significance Determination

a. Evaluation of Calculated Post-project Potential to Emit for New or Modified Emissions Units vs PSD Significant Emission Increase Thresholds

As a screening tool, the post-project potential to emit from all new and modified units is compared to the PSD significant emission increase thresholds, and if the total potentials to emit from all new and modified units are below the applicable thresholds, no futher PSD analysis is needed.

PSD Significant Emission Increase Determination: Potential to Emit (tons/year)								
	NO ₂	SO ₂	СО	РМ	PM ₁₀			
Total PE from New and Modified Units	365	284	44	70	70			
PSD Significant Emission Increase Thresholds	40	40	100	25	15			
Further Analysis required?	Yes	Yes	No	Yes	Yes			

As seen in the table above, because the post-project potential to emit from all new and modified emission units is greater than at least one PSD significant emission increase threshold, further analysis is required to determine if the project will result in an increase greater than the PSD significant emission increase thresholds, see step b. below for further analysis.

b. Evaluation of Calculated Emission Increases vs PSD Significant Emission Increase Thresholds

In this step, the emission increase for each subject pollutant is compared to the PSD significant emission increase threshold, and if the emission increase for each subject pollutant is below their threshold, no futher analysis is required.

For existing emissions units, the increase in emissions is calculated as follows:

Emission Increase = PAE - BAE - UBC

Where: PAE = Projected Actual Emissions, and

BAE = Baseline Actual Emissions UBC = Unused baseline capacity

The project's total emission increases, as calculated in the Federal Major Modification section VII.C.8 above, are listed below and compared to the PSD significant emission increase thresholds in the following table.

PSD Significant Emission Increase Determination: Emission Increase (tons/year)								
	NO_2	SO ₂	co	PM	PM ₁₀			
Emission Increases (only)	0	0	44*	0	0			
PSD Significant Emission Increase Thresholds	40	40	100	25	15			
PSD Significant Emission Increase?	No	No	No	No	No			

^{*}Since this value was not calculated in the Federal Major Modification section, as a worse case, it will be assumed to be equal to the PE2 for the units in this project.

As seen in the table above, the emission increases from the project, for modified emission units, does not exceed any of the PSD significant emission increase thresholds. Therefore the project does not result in a PSD major modification and no further discussion is required.

10. Quarterly Net Emissions Change (QNEC)

The QNEC is calculated solely to establish emissions that are used to complete the District's PAS emissions profile screen. Refer to **Appendix D** for QNEC for this project.

VIII. Compliance Determination

Rule 1080 Stack Monitoring

This Rule grants the APCO the authority to request the installation and use of continuous emissions monitors (CEMs), and specifies performance standards for the equipment and administrative requirements for recordkeeping, reporting, and notification.

Furnace #1, #2, #3, and #4 are equipped with an operational CEMs for NOx and SOx on the shared stack. Continued compliance with the requirements of this Rule is anticipated.

The following existing conditions will be included on the Authority to Construct permit for each of the furnaces:

 The furnace shall have continuous monitoring systems for NOx and SOx. The monitoring devices shall have continuous recording devices, and all records shall be kept on site. [District Rules 1080 and 4354]

- One continuous emission monitoring (CEM) system may be used for monitoring oxy-fuel fired furnaces #1, #2, #3, and #4 provided all of the exhaust gases of each of these furnaces are ducted to a common stack, and monitored down stream of the common stack. The CEMS shall comply with the requirements of 40 Code of Federal Regulations (CFR) Part 51, 40 CFR Parts 60.7 and 60.13, 40 CFR Part 60 Appendix B (Performance Specifications) and Appendix F (Quality Assurance Procedures) and the applicable sections of Rule 1080 (Stack Monitoring). [District Rule 4354]
- The facility shall install and maintain equipment, facilities, and systems compatible with the District's CEM data polling software system and shall make CEM data available to the District's automated polling system on a daily basis. [District Rule 1080]
- An annual Relative Accuracy Test Audit (RATA) shall be performed on the continuous monitoring system as outlined in 40 CFR Part 60 Appendix B. [District Rule 1080]
- The owner/operator shall perform a relative accuracy test audit (RATA) as specified by 40 CFR Part 60, Appendix F (CGAs and RATAs) and if applicable 40 CFR Part 75, Appendix B (linearity and RATAs) at least once every four calendar quarters and annually within 30 days of the anniversary date of the initial test. The permittee shall comply with the applicable requirements for quality assurance testing and maintenance of the continuous emission monitor equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F. [District Rule 1080]
- An exceedance of a NOx or SOx emission limit as indicated by the CEMS shall be reported by the operator to the APCO within 24 hours. The notification shall include 1) name and location of the facility, 2) identification of furnace(s) causing the exceedances, 3) calculation of actual NOx, CO and VOC emissions, and 4) corrective actions and schedules to complete the work. [District Rule 1080 and Stanislaus County Rule 1080]
- The operator shall notify the APCO no later than one hour after the detection of a breakdown of the CEMS. The operator shall inform the APCO of the intent to shut down the CEMS at least 24 hours prior to the event. [District Rule 1100]
- The permittee shall submit a written report including copies of any Equipment Breakdown reports and/or pertinent variance decisions to the APCO for each calendar quarter, within 30 days of the end of the quarter, including: time intervals, data and magnitude of excess emissions, nature and cause of excess emissions (if known), corrective actions taken and preventive measures adopted; averaging period used for data reporting shall correspond to the averaging period for each respective emission standard; applicable time and date of each period during which the CEM was inoperative (except for zero and span checks) and the nature of system repairs and adjustments; and a negative declaration when no excess emissions occurred. [District Rule 1080]
- Upon notice by the District that the facility's CEM system is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the CEM data is sent to the District by a Districtapproved alternative method. [District Rule 1080]

- Results of continuous emissions monitoring shall be reduced according to the procedure established in 40 CFR, Part 51, Appendix P, paragraphs 5.0 through 5.3.3, or by other methods deemed equivalent by mutual agreement with the District, the ARB, and the EPA. [District Rule 1080]
- Cylinder gas audits (GGAs) of continuous emission monitors shall be conducted quarterly, except during quarters in which relative accuracy and total accuracy testing is performed, in accordance with EPA guidelines. The District shall be notified prior to completion of the audits. Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rule 1080]
- {2251} The owner or operator shall, upon written notice from the APCO, provide a summary of the data obtained from the CEM systems. This summary of data shall be in the form and the manner prescribed by the APCO. [District Rule 1080]
- Records shall be maintained and shall include: the occurrence and duration of any startup, shutdown or malfunction, performance testing, evaluations, calibrations, checks,
 adjustments, any periods during which a continuous monitoring system or monitoring
 device is inoperative, maintenance of any CEMS that have been installed pursuant to
 District Rule 1080, and emission measurements. [District Rule 1080]

Rule 1081 Source Sampling

This rule requires adequate and safe facilities for use in sampling to determine compliance with emission limits, and specifies methods and procedures for source testing and sample collection. Compliance with this Rule is expected.

The furnaces are subject to Rule 1081 requirements. The following existing conditions will be included on the Authority to Construct permit for each of the furnaces:

- The common exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NOx, CO, and O2 analyzer during District inspections. The sampling ports shall be located in accordance with the CARB regulation titled California Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Source Emission Monitoring and Testing. [District Rule 1081]
- Source testing to demonstrate compliance with permit conditions and all rules and regulations for both natural gas and LPG shall be conducted within 60 days after the end of the start-up exemption, and at least once every calendar year thereafter. NOx and CO testing shall be performed using CARB Method 100. VOC testing shall be performed using EPA methods 25A. PM10 testing shall be performed using EPA methods 201 and 202, EPA methods 201a and 202, or CARB methods 501 and 5. SOx testing shall be performed using EPA Method 8 and CARB Method 1-100. [District Rules 1081, 2201, 2520, §9.3.2; and 4354]

- Source testing when firing on LPG fuel need not be performed if the LPG fuel usage for this furnace does not exceed 100 hours during any one calendar year. A source test shall be performed within 90 days after this furnace exceeds 100 hours of operation, on LPG, on an annual basis. [District Rule 1081]
- Source testing shall be conducted by a CARB-certified source testing contractor. Source
 testing shall be conducted using the methods and procedures approved by the District.
 The District must be notified 30 days prior to any compliance source test, and a source
 test plan must be submitted for approval at least 15 days prior to source testing. The
 results of each source test shall be submitted to the District within 60 days after the source
 test date. [District Rule 1081]
- PM and PM10 source testing shall be conducted downstream of the electrostatic precipitator and the ceramic filter dust collectors in the common stack. Furnaces #1, #2, #3, and #4 must operate simultaneously during source testing unless prior approval is obtained from the District. [District Rule 1081]

Rule 2201 New and Modified Stationary Source Review Rule

A. Best Available Control Technology (BACT)

Pursuant to Section 4.2.3 of Rule 2201, for existing facilities, the installation or modification of an emission control technique performed solely for the purpose of compliance with the requirements of District, State or Federal air pollution control laws, regulations, or orders, as approved by the APCO, shall be exempt from Best Available Control Technology for all air pollutants, provided all of the following conditions are met:

- There shall be no increase in the physical or operational design of the existing facility, except for those changes to the design needed for the installation or modification of the emission control technique itself;
- There shall be no increase in the permitted rating or permitted operating schedule of the permitted unit;
- There shall be no increase in emissions from the stationary source that will cause or contribute to any violation of a National Ambient Air Quality Standard, Prevention of Significant Deterioration increment, or Air Quality Related Value in Class I areas;
- The project shall not result in an increase in permitted emissions or potential to emit
 of more than 25 tons per year of NOx, or 25 tons per year of VOC, or 15 tons per
 year of SOx, or 15 tons per year of PM10, or 50 tons per year of CO; and
- The project shall not constitute a federal major modification.

Gallo Glass Company uses oxy-fuel to reduce NOx emissions from glass melting furnace. The furnaces operate slightly under negative pressure and pull ambient air through the various ingresses into the furnaces. The company has proposed to physically and operationally (as discussed in the proposal section) modify the existing furnaces to minimize ambient air ingresses and install a CO monitoring system to operate furnaces in a richer (low excess oxygen) combustion environment to comply with the NOx requirements in Rule 4354.

Gallo Glass Company uses calcium hydroxide injection dry scrubber system to reduce SOx emissions. Calcium hydroxide injection rate would be optimized to comply with the SOx requirements in Rule 4354.

Gallo Glass Company uses CDC and or ESP systems to reduce PM_{10} emissions. CDC systems were installed few years ago and have shown to demonstrate compliance with the reduced PM_{10} emissions limits.

The proposed project is solely to comply with the requirements of District Rule 4354. There is no increase in physical or operational design (except the ones noted in the proposal section). Further, there is no increase permitted rating of the furnaces, or emissions that would adversely cause deterioration of the ambient air standard. Lastly, as concluded in Section VII.C.8 above, this project does not constitute a Federal Major Modification. Thus, the proposed project is exempt from the BACT requirements.

B. Offsets

Pursuant to Section 4.6.8 of Rule 2201, for existing facilities, the installation or modification of an emission control technique performed solely for the purpose of compliance with the requirements of District, State or Federal air pollution control laws, regulations, or orders, as approved by the APCO, shall be exempt from Best Available Control Technology for all air pollutants, provided all of the following conditions are met:

- There shall be no increase in the physical or operational design of the existing facility, except for those changes to the design needed for the installation or modification of the emission control technique itself;
- There shall be no increase in the permitted rating or permitted operating schedule of the permitted unit;
- There shall be no increase in emissions from the stationary source that will cause or contribute to any violation of a National Ambient Air Quality Standard, Prevention of Significant Deterioration increment, or Air Quality Related Value in Class I areas; and
- The project shall not result in an increase in permitted emissions or potential to emit
 of more than 25 tons per year of NOx, or 25 tons per year of VOC, or 15 tons per
 year of SOx, or 15 tons per year of PM10, or 50 tons per year of CO;

As noted previously, Gallo Glass Company uses an oxy-fuel combustion system to reduce NOx emissions from glass melting furnace. The furnaces operate slightly under negative pressure and pull ambient air through the various ingresses into the furnaces. The company has proposed to physically and operationally (as discussed in the proposal section) modify the existing furnaces to minimize ambient air ingresses and install a CO monitoring system to operate furnaces in a richer (low excess oxygen) combustion environment to comply with the NOx requirements in Rule 4354.

Gallo Glass Company uses calcium hydroxide injection dry scrubber system to reduce SOx emissions. Calcium hydroxide injection rate would be optimized to comply with the SOx requirements in Rule 4354.

The proposed project is solely to comply with the requirements of District Rule 4354. There is no increase in physical or operational design (except the ones noted in the proposal section). Further, there is no increase permitted rating of the furnaces, or emissions that would adversely cause deterioration of the ambient air standard. Thus, the proposed project is exempt from emission offsets requirements.

C. Public Notification

1. Applicability

Pursuant to District Rule 2201, Section 5.4, public noticing is required for:

- a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications,
- b. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,
- c. Any project which results in the offset thresholds being surpassed,
- d. Any project with an SSIPE of greater than 20,000 lb/year for any pollutant, and/or
- e. Any project which results in a Title V significant permit modification

a. New Major Sources, Federal Major Modifications, and SB 288 Major Modifications

New Major Sources are new facilities, which are also Major Sources. Since this is not a new facility, public noticing is not required for this project for New Major Source purposes.

As seen in Section VII.C.7 above, this project is an SB 288 Major Modification. Therefore, public noticing for SB 288 Major Modification purposes is required.

b. PE > 100 lb/day

Applications which include a new emissions unit with a PE greater than 100 pounds during any one day for any pollutant will trigger public noticing requirements.

The proposed project does not include any new emissions unit, therefore this section is not applicable.

c. Offset Threshold

Public notification is required if the pre-project Stationary Source Potential to Emit (SSPE1) is increased to a level exceeding the offset threshold levels. The following table compares the SSPE1 with the SSPE2 in order to determine if any offset thresholds have been surpassed with this project.

Offset Thresholds				
Pollutant	SSPE1 (lb/year)	SSPE2 (lb/year)	Offset Threshold	Public Notice Required?
NO _X	1,438,862	1,210,526	20,000 lb/year	No
SO _X	702,001	569,418	54,750 lb/year	No
PM ₁₀	465,528	269,922	29,200 lb/year	No
СО	113,166	113,166	200,000 lb/year	No
VOC	16,687	16,687	20,000 lb/year	No

As seen in the table above, there were no thresholds surpassed with this project; therefore public noticing is not required for offset purposes.

d. SSIPE > 20,000 lb/year

Public notification is required for any permitting action that results in a SSIPE of more than 20,000 lb/year of any affected pollutant. According to District policy, the SSIPE = SSPE2 – SSPE1. The SSIPE is compared to the SSIPE Public Notice thresholds in the following table. Negative SSIPE values are equated to 0.

SSIPE Public Notice Thresholds					
Pollutant	SSPE2 (lb/year)	SSPE1 (lb/year)	SSIPE (lb/year)	SSIPE Public Notice Threshold	Public Notice Required?
NO _x	1,210,526	1,438,862	0	20,000 lb/year	No
SO _x	569,418	702,001	0	20,000 lb/year	No
PM ₁₀	269,922	465,528	0	20,000 lb/year	No
CO	113,166	113,166	0	20,000 lb/year	No
VOC	16,687	16,687	0	20,000 lb/year	No

As seen in the table above, the SSIPE for each pollutant is less than 20,000 lb/year; therefore public noticing for SSIPE purposes is not required.

e. Title V Significant Permit Modification

As shown in the Discussion of Rule 2520 below, this project does not constitute a Title V significant modification. Therefore, public noticing for Title V significant modifications is not required for this project.

2. Public Notice Action

As discussed above, public noticing is required for this project for being an SB 288 Major Modification. Therefore, public notice documents will be submitted to the California Air Resources Board (CARB), EPA, and a public notice will be electronically published on the District's website prior to the issuance of the ATCs.

D. Daily Emission Limits (DELs)

DELs and other enforceable conditions are required by Rule 2201 to restrict a unit's maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. The DEL must be contained in the latest ATC and contained in or enforced by the latest PTO and enforceable, in a practicable manner, on a daily basis. DELs are also required to enforce the applicability of BACT.

Proposed Rule 2201 (DEL) Conditions:

N-1662-1, -2, -3, -4

- The furnace shall be fired on natural gas and LPG only. [District Rule 2201]
- Except during periods of startup, shutdown, and idling, the combined SOx emissions from permit units N-1662-1, N-1662-2, N-1662-3 and N-1662-4 shall not exceed 0.77 lb/ton of glass produced (over a rolling 30 day average). [District Rules 2201 and 4354]
- Except during periods of startup, shutdown, idling, and during full or partial emission control system bypass episodes, PM10 emissions shall not exceed 0.18 lb/ton of glass produced. [District Rules 2201 and 4354]
- The PM10 emissions, during full or partial emission control system bypass episodes for routine maintenance, shall not exceed 0.71 lb/ton of glass produced. [District Rule 2201]
- The maximum throughput of lime received and stored in the lime storage silo shared with permit units N-1662-1, N-1662-2, N-1662-3 and N-1662-4 shall not exceed either of the following: 65 ton-lime/day or 110 tons-lime/quarter. [District Rule 2201]
- PM10 emissions rate from the lime storage silo shared with permit units N-1662-1, N-1662-2, N-1662-3 and N-1662-4 shall not exceed 0.0049 lb-PM10/ton-lime stored. [District Rule 2201]

N-1662-1-23

- The quantity of glass produced shall not exceed 520.1 tons during any one day. [District Rules 2201 and 4354]
- Except during periods of startup, shutdown, and idling, NOx emissions shall not exceed 0.99 pounds per ton of glass produced (over a rolling 30-day average). This performance based limit is to enforce the NOx emission reductions granted by certificate number N-106-2, as well as, Phase I NOx limit in Rule 4354. Any CEM measurement greater than 0.99 lb-NOx/ton of glass produced for each 30-day rolling average constitutes a violation of this emission limit. [District Rules 2201 and 4354]
- Except during periods of startup, shutdown, and idling, CO emissions shall not exceed 0.04 pounds per ton of glass produced. This performance based limit is to enforce the CO emission reductions granted by certificate number N-106-3. [District NSR Rule]
- Except during periods of startup, shutdown, and idling, VOC emissions shall not exceed 0.02 pounds per ton of glass produced. [District Rule 2201]
- The PM10 emissions shall not exceed 22,936 pounds during the first calendar quarter, 23,190 pounds during the second calendar quarter, 23,445 pounds during the third calendar quarter and 23,445 pounds during the fourth calendar quarter. These limits are to enforce the PM10 emission reductions granted by certificate number N-161-4. [District Rule 2201]

N-1662-2-24

- The quantity of glass produced shall not exceed 430 tons during any one day. [District Rules 2201 and 4354]
- Except during periods of startup, shutdown, and idling, NOx emissions shall not exceed 0.99 pounds per ton of glass produced (over a rolling 30-day average). This performance based limit is to enforce the NOx emission reductions granted by certificate number N-54-2, as well as, Phase I NOx limit in Rule 4354. Any CEM measurement greater than 0.99 lb-NOx/ton of glass produced for each 30-day rolling average constitutes a violation of this emission limit. [District Rules 2201 and 4354]
- Except during periods of startup, shutdown, and idling, CO emissions shall not exceed 0.2 pounds per ton of glass produced. [District Rule 2201]
- Except during periods of startup, shutdown, and idling, VOC emissions shall not exceed 0.02 pounds per ton of glass produced. [District Rule 2201]

 The PM10 emissions shall not exceed 18,712 pounds during the first calendar quarter, 18,919 pounds during the second calendar quarter, 19,127 pounds during the third calendar quarter and 19,128 pounds during the fourth calendar quarter. These limits are to enforce the PM10 emission reductions granted by certificate number N-161-4. [District Rule 2201]

N-1662-3-23

- The quantity of glass produced shall not exceed 430 tons during any one day. [District Rules 2201 and 4354]
- Except during periods of startup, shutdown, and idling, NOx emissions shall not exceed 0.99 pounds per ton of glass produced (over a rolling 30-day average). This performance based limit is to enforce the NOx emission reductions granted by certificate number N-56-2, as well as, Phase I NOx limit in Rule 4354. Any CEM measurement greater than 0.99 lb-NOx/ton of glass produced for each 30-day rolling average constitutes a violation of this emission limit. [District Rules 2201 and 4354]
- Except during periods of startup, shutdown, and idling, CO emissions shall not exceed 0.01 pounds per ton of glass produced. This performance based limit is to enforce the CO emission reductions granted by certificate number N-56-3. [District Rule 2201]
- Except during periods of startup, shutdown, and idling, VOC emissions shall not exceed 0.02 pounds per ton of glass produced. [District Rule 2201]
- The PM10 emissions shall not exceed 19,006 pounds during the first calendar quarter, 19,178 pounds during the second calendar quarter, 19,351 pounds during the third calendar quarter and 19,351 pounds during the fourth calendar quarter. These limits are to enforce the PM10 emission reductions granted by certificate number N-161-4. [District Rule 2201]

N-1662-4-25

- The quantity of glass produced shall not exceed 637.9 tons during any one day. [District Rules 2201 and 4354]
- Except during periods of startup, shutdown, and idling, NOx emissions shall not exceed 0.99 pounds per ton of glass produced (over a rolling 30-day average). This performance based limit is to enforce the NOx emission reductions granted by certificate number N-107-2, as well as, Phase I NOx limit in Rule 4354. Any CEM measurement greater than 0.99 lb-NOx/ton of glass produced for each 30-day rolling average constitutes a violation of this emission limit. [District Rules 2201 and 4354]

- Except during periods of startup, shutdown, and idling, CO emissions shall not exceed 0.20 pounds per ton of glass produced. [District Rule 2201]
- Except during periods of startup, shutdown, and idling, VOC emissions shall not exceed 0.02 pounds per ton of glass produced. [District Rule 2201]
- The PM10 emissions shall not exceed 28,132 pounds during the first calendar quarter, 28,445 pounds during the second calendar quarter, 28,757 pounds during the third calendar quarter and 28,758 pounds during the fourth calendar quarter. These limits are to enforce the PM10 emission reductions granted by certificate number N-161-4. [District Rule 2201]

E. Compliance Assurance

1. Source Testing

N-1662-1, -2, -3, -4

Gallo Glass Company is required to conduct a source testing to verify compliance with NOx, SOx, PM₁₀, CO and VOC emission limits within 60 days of initial startup under each permit.

The facility is expected to increase sorbent injection rate to the scrubber to reduce SOx emissions, which could cause a spike in PM_{10} emissions; therefore, PM_{10} testing is required.

Some NOx reductions would be achieved by operating furnaces in low excess oxygen environment, which may cause an increase in CO or VOC emissions. As such, CO and VOC testing is also required.

The annual testing is required for District Rule 4354 compliance. The following existing conditions will be included each Authority to Construct permit:

- Source testing to demonstrate compliance with permit conditions and all rules and regulations for both natural gas and LPG shall be conducted within 60 days after the end of the start-up exemption, and at least once every calendar year thereafter. NOx and CO testing shall be performed using CARB Method 100. VOC testing shall be performed using EPA methods 25A. PM10 testing shall be performed using EPA methods 201 and 202, EPA methods 201a and 202, or CARB methods 501 and 5. SOx testing shall be performed using EPA Method 8 and CARB Method 1-100. [District Rules 1081, 2201, 2520, 9.3.2; and 4354]
- Source testing when firing on LPG fuel need not be performed if the LPG fuel usage for this furnace does not exceed 100 hours during any one calendar year. A source test shall be performed within 90 days after this furnace exceeds 100 hours of operation, on LPG, on an annual basis. [District Rule 1081]

- Source testing shall be conducted by a CARB-certified source testing contractor. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to source testing. The results of each source test shall be submitted to the District within 60 days after the source test date. [District Rule 1081]
- Source test conditions shall be representative of operations equal to or greater than 60 percent of the fuel use capacity for each furnace as stated in the Permit to Operate. [District Rule 4354]
- PM and PM10 source testing shall be conducted downstream of the electrostatic precipitator and the ceramic filter dust collectors in the common stack. Furnaces #1, #2, #3, and #4 must operate simultaneously during source testing unless prior approval is obtained from the District. [District Rule 1081]

2. Monitoring

N-1662-1, -2, -3, -4

The furnaces at this facility exhaust through a common stack that is equipped with an operational CEMs for NOx and SOx. Additional monitoring requirements are discussed in the District Rule 4354 section of this document. The following existing conditions will continue to be included in each operating permit:

- The furnace shall have continuous monitoring systems for NOx and SOx. The monitoring devices shall have continuous recording devices, and all records shall be kept on site. [District Rules 1080 and 4354]
- One continuous emissions monitoring (CEM) system may be used for monitoring oxyfuel fired furnaces #1, #2, #3, and #4 provided all of the exhaust gases of each of these furnaces are ducted to a common stack, and monitored down stream of the common stack. The CEMS shall comply with the requirements of 40 Code of Federal Regulations (CFR) Part 51, 40 CFR Parts 60.7 and 60.13, 40 CFR Part 60 Appendix B (Performance Specifications) and Appendix F (Quality Assurance Procedures) and the applicable sections of Rule 1080 (Stack Monitoring). [District Rule 4354]
- The facility shall install and maintain equipment, facilities, and systems compatible
 with the District's CEM data polling software system and shall make CEM data
 available to the District's automated polling system on a daily basis. [District Rule
 1080]

3. Recordkeeping

N-1662-1, -2, -3, -4

Recordkeeping is required to demonstrate compliance with the offset, public notification, and daily emission limit requirements of Rule 2201. The following recordkeeping requirements will be included on the Authority to Construct permit:

- Permittee shall keep a record of the daily hours of operation, the amount of glass pulled from the furnace (in tons), the NOx emissions (in lb/ton of glass pulled), the SOx emissions (in lb/ton of glass pulled), the weight of mixed color mix cullet used, the total amount of cullet used (by weight) and the ratio of the mixed color cullet weight to the total cullet weight (in percent). [District Rules 2201 and 4354]
- Permittee shall maintain records of the following: 1) Source tests and source test
 results, 2) the acceptable range for each approved key system operating parameter,
 as established during source tests, 3) The operating values of the key system
 operating parameters at the approved recording frequency, 4) any maintenance and
 repair, and 5) any malfunctions. [District Rule 4354]
- The permittee shall maintain the burner oxygen to fuel ratio records required by this permit. [District Rules 2201 and 4354]
- A record of the cumulative annual number of hours that the emission control system is either fully or partially bypassed shall be kept. The record shall be updated at least weekly. [District Rules 2201 and 4354]
- The permittee shall keep a record of the cumulative annual hours of operation of the glass furnace on LPG fuel. [District Rule 2201]
- When the electrostatic precipitator is in operation, the permittee shall maintain daily records of the specific power of the electrostatic precipitator (in milliwatts/acfm).
 [District Rules 2201, 4354, and 40 CFR Part 64]
- The operator shall monitor and record the pressure differential gauge reading of the ceramic filter dust collector at least once during each day that the unit operates. [District Rules 2201 and 4354 and 40 CFR Part 64]
- Records of dust collector and bin vent filter maintenance, inspections and repairs shall be maintained. The records shall include, date of inspection, change outs of filter media, corrective action taken, and identification of the individual performing the inspection. [District Rules 2201 and 2520, 9.4.2]
- Records of daily and quarterly amount of lime transferred into the lime storage silo shall be maintained. [District Rules 1070 and 2201]

 All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 2201 and 4354 and 40 CFR Part 64]

4. Reporting

N-1662-1, -2, -3, -4

Source test conduct is required to be submitted within 60 days after conducting the testing.

Rule 2410 Prevention of Significant Deterioration

As shown in Section VII.C.9 above, this project does not result in a new PSD major source or PSD major modification. No further discussion is required.

Rule 2520 Federally Mandated Operating Permits

This facility is subject to this Rule, and has received their Title V Operating Permit. The proposed modification is a Minor Modification to the Title V Permit.

In accordance with Rule 2520, Minor Permit Modifications are permit modifications that:

- 1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
- 2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
- 3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
- 4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include:
 - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
 - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
- 5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
- 6. Do not seek to consolidate overlapping applicable requirements;
- 7. Do not grant or modify a permit shield.

Additionally, Section 11.4 requires a description of the proposed change, the emissions resulting from the change, any new applicable requirements that will apply if the change occurs, suggested draft permits, compliance certification and an EPA 45-day review period of the proposed permit modification (or a shorter period if EPA has notified the District that EPA will not object to issuance of the permit modification, whichever is first).

As discussed above, the facility has applied for a Certificate of Conformity (COC) and the District will forward to EPA, for a 45-day review period, this application review which includes the proposed modified Title V permit [i.e. proposed ATC(s)] and the compliance certification form which demonstrates compliance with the minor permit modification requirements in Section 11.4. Therefore, the facility must apply to modify their Title V permit with an administrative amendment, prior to operating with the proposed modifications. Continued compliance with this rule is expected. The facility may construct/operate under the ATC upon submittal of the Title V administrative amendment application.

Rule 4001 New Source Performance Standards (NSPS)

40 CFR Part 60 Subpart CC - Standards of Performance for Glass Manufacturing Plants

N-1662-2, -3, -4

Per Section 60.290, a glass manufacturing facility is subject to 40 CFR 60 Subpart CC if the affected facility commences construction (reconstruction) or modification after June 15, 1979. Section 60.2 defines a "modification" as "any physical change in, or change in the method of operation of an existing facility which increases the amount of any pollutant (to which the standard applies) emitted into the atmosphere by that facility or which results in the emission of any air pollutant (to which a standard applies) into the atmosphere not previously emitted."

Furnaces #2, #3 and #4 have been modified since 1979 and are subject to the requirements of Subpart CC. Furnace #1 has not been modified, as defined in the subpart, since 1979 and is not subject to the requirements of Subpart CC. The following existing conditions will be included on the ATCs for furnaces #2, #3, and #4 as a mechanism to ensure compliance with the requirements of 40 CFR 60 Subpart CC:

- PM emissions from the glass furnace shall not exceed 1 gram of particulate matter per kilogram of glass produced. [40 CFR 60.293(b)(2)]
- Devices to measure the primary and secondary voltage and current of the electrostatic precipitator shall be maintained in accordance with the manufacturer's specifications. [District Rule 4354, 40 CFR 60.293(d), and 40 CFR Part 64]
- When the electrostatic precipitator is in operation, the specific power of the electrostatic precipitator shall be at least 70 milliwatts/acfm except during the bypass episodes allowed by this permit. [District Rule 2520, §9.3.2, 40 CFR 60.293(d), and 40 CFR Part 64]
- When the electrostatic precipitator is in operation, the specific power of the electrostatic precipitator shall be continuously monitored and recorded. [District Rules 2201 and 4354, 40 CFR 60.293(d), and 40 CFR Part 64]

 When the electrostatic precipitator is in operation, the permittee shall maintain daily records of the specific power of the electrostatic precipitator (in milliwatts/acfm).
 [District Rules 2201, 4354, 40 CFR 60.293(d) and 40 CFR Part 64]

Rule 4002 National Emission Standards for Hazardous Air Pollutants (NESHAPs)

<u>40 CFR Part 61 Subpart N – National Emission Standard for Inorganic Arsenic Emissions</u> <u>from Glass Manufacturing Plants</u>

N-1662-1, -2, -3, -4

This subpart applies to furnaces that use commercial arsenic as a raw material. The facility is prohibited by the Title V permit from using commercial arsenic as a raw material; therefore, this rule will not apply to the furnace. The following existing condition will continue to be listed on each of the Authority to Construct permits for the furnaces:

 The requirements of 40 CFR Part 61, Subpart N were determined to not apply to this unit because the unit does not use commercial arsenic. A permit shield is granted from these requirements. [District Rule 2520]

<u>40 CFR Part 63 Subpart SSSSS – National Emission Standard for Hazardous Air Pollutants for Glass Manufacturing Area Sources</u>

N-1662-2, -3, -4

Section 63.11448

Facilities are subject to this subpart if they own or operate a glass manufacturing facility that is an area source of hazardous air pollutant (HAP) emissions and meets all of the criteria specified in paragraphs (a) through (c) of this section.

- (a) A glass manufacturing facility is a plant site that manufactures flat glass, glass containers, or pressed and blown glass by melting a mixture of raw materials, as defined in §63.11459, to produce molten glass and form the molten glass into sheets, containers, or other shapes.
- (b) An area source of HAP emissions is any stationary source or group of stationary sources within a contiguous area under common control that does not have the potential to emit any single HAP at a rate of 9.07 megagrams per year (Mg/yr) (10 tons per year (tpy)) or more and any combination of HAP at a rate of 22.68 Mg/yr (25 tpy) or more.
- (c) Glass manufacturing facilities that use one or more continuous furnaces to produce glass that contains compounds of one or more glass manufacturing metal HAP, as defined in §63.11459, as raw materials in a glass manufacturing batch formulation.

The facility is a glass manufacturing facility and will continue to be an area source of HAP emissions. Therefore, this facility is subject to the requirements of this subpart. The following existing condition will be included on each Authority to Construct permit:

 Any glass melting furnace located at an Area Source of hazardous air pollutants shall comply with 40 CFR Part 63 Subpart SSSSS (National Emission Standards for Hazardous Air Pollutants for Glass Manufacturing Area Sources). [40 CFR Part 63 Subpart SSSSSS]

Compliance with the requirements of Subpart SSSSS is expected.

Rule 4101 Visible Emissions

District Rule 4101, Section 5.0, indicates that no air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour, which is dark or darker than Ringelmann 1 or equivalent to 20% opacity.

The following existing condition listed on the facility-wide permit (-0-4) will be maintained as a mechanism to ensure compliance:

• {4383} No air contaminants shall be discharged into the atmosphere for a period or periods aggregating more than 3 minutes in any one hour which is as dark or darker than Ringelmann #1 or equivalent to 20% opacity and greater, unless specifically exempted by District Rule 4101 (02/17/05). If the equipment or operation is subject to a more stringent visible emission standard as prescribed in a permit condition, the more stringent visible emission limit shall supersede this condition. [District Rule 4101, and County Rules 401 (in all eight counties in the San Joaquin Valley)]

Rule 4102 Nuisance

Rule 4102 prohibits discharge of air contaminants which could cause injury, detriment, nuisance or annoyance to the public. Public nuisance conditions are not expected as a result of these operations, provided the equipment is well maintained. Therefore, compliance with this rule is expected. The following existing condition ensures on-going compliance with this section:

 No air contaminant shall be released into the atmosphere, which causes a public nuisance. [District Rule 4102]

California Health & Safety Code 41700 (Health Risk Assessment)

District Policy APR 1905 – *Risk Management Policy for Permitting New and Modified Sources* specifies that for an increase in emissions associated with a proposed new source or modification, the District perform an analysis to determine the possible impact to the nearest resident or worksite.

District policy APR 1905 also specifies that the increase in emissions associated with a proposed new source or modification of an existing source shall not result in an increase in cancer risk greater than the District's significance level (20 in a million) and shall not result in acute and/or chronic risk indices greater than 1.

As demonstrated above, there are no increases in emissions associated with this project, therefore a health risk assessment is not necessary and no further risk analysis is required.

Rule 4201 Particulate Matter Concentration

Section 3.1 prohibits discharge of dust, fumes, or total particulate matter into the atmosphere from any single source operation in excess of 0.1 grain per dry standard cubic foot.

N-1662-1, -2, -3, -4

The worst case particulate matter emission concentration from the furnaces will occur during operation with the emission control system (ESP and ceramic filter dust collectors) by-passed. Compliance with the requirements of this rule was shown during recent source test performed on 7/1/20 which measured a concentration of 0.04 gr/dscf. Continued compliance is expected.

```
For the shared lime storage silo:

PM Conc. (gr/scf) = (PM emission rate) x (7,000 gr/lb)

(Air flow rate) x (60 min/hr) x (24 hr/day)
```

 PM_{10} emission rate = 0.3 lb/day. Assuming 100% of PM is PM_{10} Exhaust Gas Flow = 500 scfm per the applicant

```
PM Conc. (gr/scf) = [(0.3 lb/day) * (7,000 gr/lb)] \div [(500 ft^3/min) * (60 min/hr) * (24 hr/day)]
PM Conc. = 0.0029 gr/scf
```

Therefore, compliance with the Rule is expected.

Rule 4202 Particulate Matter – Emission Rate

Per Sec. 4.1, the particulate matter emissions from any source operation shall not exceed the allowable hourly emission rate (E) as calculated using the following formulas:

```
E (lb/hr) = 3.59 P^{0.62} for process rates < 30 tons/hr E (lb/hr) = 17.31 P^{0.16} for process rates > 30 tons/hr
```

```
Where P = process weight in tons/hr
N-1662-1, -2, -3, -4 (Hydrated Lime Receiving & Storage)
```

Hourly Process Rate = 400 lb/ft³ x 500 ft³/min x 60 min/hr ÷ 2000 lb/ton = 6000 ton/hr

Where 400 lb/ft³ is the density of lime and 500 ft³/min is the flow rate through the silo per the applicant.

```
Rule 4202 emission limit = 17.31 * P^{0.16} (where P is greater than 30 tons/hr) = 17.31 * (2.5)^{0.16} = 20.04 lb/hr
```

The operation has a maximum Post-Project Potential to Emit (PE2) of 0.3 lb/hr (assuming that the entire daily throughput limit can be processed in one hour).

Since the PE PM is less than the allowable value of 20.04 lb-PM/hr, the PM emissions are within allowable limits and compliance with the rule is expected.

N-1662-1 (Glass Melting Furnace#1)

Hourly Process Rate = 520.1 tons/day ÷ 24 hr/day = 21.67 tons/hr

```
Rule 4202 emission limit = 3.59 * P^{0.62} (where P less than or equal to 30 tons/hr) = 3.59 * (21.67)^{0.62} = 24.17 lb-PM/hr
```

The worst case particulate matter emission concentration from the furnaces will occur during operation with the emission control system (ESP and ceramic filter dust collectors) by-passed.

Pursuant to AP-42 Table 11.15-3, the PM₁₀ fraction for a glass furnace manufacturing operation served by an electrostatic precipitator is 0.75 lb-PM₁₀/lb-PM. Since the PM₁₀/lb-PM ratio is expected to be similar, using this data and the PM₁₀ emission rate from the furnace:

```
PE PM = 369.3 lb-PM<sub>10</sub>/day x lb-PM/0.75 lb-PM<sub>10</sub> x day/24 hours PE PM = 20.51 lb/hr
```

Since the PE PM is less than the allowable value of 24.17 lb-PM/hr, the PM emissions are within allowable limits and compliance with the rule is expected for this furnace.

N-1662-2 (Glass Melting Furnace#2)

Hourly Process Rate = 430 tons/day ÷ 24 hr/day = 17.92 tons/hr

```
Rule 4202 emission limit = 3.59 * P^{0.62} (where P less than or equal to 30 tons/hr) = 3.59 * (17.92)^{0.62} = 21.49 lb-PM/hr
```

The worst case particulate matter emission concentration from the furnaces will occur during operation with the emission control system (ESP and ceramic filter dust collectors) by-passed.

Pursuant to AP-42 Table 11.15-3, the PM $_{10}$ fraction for a glass furnace manufacturing operation served by an electrostatic precipitator is 0.75 lb-PM $_{10}$ /lb-PM. Since the PM $_{10}$ /lb-PM ratio is expected to be similar, using this data and the PM $_{10}$ emission rate from the furnace:

```
PE PM = 305.3 lb-PM10/day x lb-PM/0.75 lb-PM<sub>10</sub> x day/24 hours PE PM = 16.96 lb/hr
```

Since the PE PM is less than the allowable value of 21.49 lb-PM/hr, the PM emissions are within allowable limits and compliance with the rule is expected for this furnace.

N-1662-3 (Glass Melting Furnace#3)

Hourly Process Rate = 430 tons/day ÷ 24 hr/day = 17.92 tons/hr

```
Rule 4202 emission limit = 3.59 * P^{0.62} (where P less than or equal to 30 tons/hr) = 3.59 * (17.92)^{0.62} = 21.49 lb-PM/hr
```

The worst case particulate matter emission concentration from the furnaces will occur during operation with the emission control system (ESP and ceramic filter dust collectors) by-passed.

Pursuant to AP-42 Table 11.15-3, the PM $_{10}$ fraction for a glass furnace manufacturing operation served by an electrostatic precipitator is 0.75 lb-PM $_{10}$ /lb-PM. Since the PM $_{10}$ /lb-PM ratio is expected to be similar, the PM $_{10}$ emission rate from the furnace:

```
PE PM = 305.3 lb-PM<sub>10</sub>/day x lb-PM/0.75 lb-PM<sub>10</sub> x day/24 hours PE PM = 16.96 lb/hr
```

Since the PE PM is less than the allowable value of 21.49 lb-PM/hr, the PM emissions are within allowable limits and compliance with the rule is expected for this furnace.

N-1662-4 (Glass Melting Furnace#4)

Hourly Process Rate = 637.9 tons/day ÷ 24 hr/day = 26.58 tons/hr

```
Rule 4202 emission limit = 3.59 * P^{0.62} (where P less than or equal to 30 tons/hr) = 3.59 * (26.58)^{0.62} = 27.44 lb-PM/hr
```

The worst case particulate matter emission concentration from the furnaces will occur during operation with the emission control system (ESP and ceramic filter dust collectors) by-passed.

Pursuant to AP-42 Table 11.15-3, the PM₁₀ fraction for a glass furnace manufacturing operation served by an electrostatic precipitator is 0.75 lb-PM₁₀/lb-PM. Since the PM₁₀/lb-PM ratio is expected to be similar, using this data and the PM₁₀ emission rate from the furnace:

```
PE PM = 452.9 lb-PM10/day x lb-PM/0.75 lb-PM<sub>10</sub> x day/24 hours PE PM = 25.18 lb/hr
```

Since the PE PM is less than the allowable value of 27.44 lb-PM/hr, the PM emissions are within allowable limits and compliance with the rule is expected for this furnace.

Rule 4301 Fuel Burning Equipment

This rule specifies maximum emission rates in lb/hr for SO_2 , NO_2 , and combustion contaminants (defined as total PM in Rule 1020). This rule also limits combustion contaminants to ≤ 0.1 gr/scf. According to AP 42 (Table 1.4-2, footnote c), all PM emissions from natural gas combustion are less than 1 μ m in diameter.

Per Section 3.1 defines fuel burning equipment as any furnace, boiler, apparatus, stack, and all appurtenances thereto, used in the process of burning fuel for the primary purpose of producing heat or power by indirect heat transfer. The glass furnaces use direct heat transfer; therefore, this rule is not applicable to the glass furnaces.

Rule 4354 Glass Melting Furnaces

The purpose of this rule is to limit emissions of nitrogen oxides (NOx), carbon monoxide (CO), volatile organic compounds (VOC), oxides of sulfur (SOx), and particulate matter (PM $_{10}$) from glass melting furnaces. This rule and the following analysis applies to the furnaces under permits N-1662-1, -2, -3, and -4.

NOx Emission Limits

Section 5.1.1 identifies NO_X emission limits for glass melting furnaces. The following applicable emission limits pursuant to Section 5.1 for glass furnaces are:

Table 1 – NOx Emission Limits (lb/ton glass produced), in effect until December 31, 2023			
Furnace Type	NO _x Limit		
Container Glass	1.5 ^A		

^A Rolling 30-day average

Table 2 – NOx Emission Limits (lb/ton glass produced), in effect on and after January 1, 2024			
Furnace Type	Phase I NO _x Limit	Phase II NO _X Limit	
Container Glass	1.1 ^A	0.75 ^A	

A Rolling 30-day average

Section 5.1.2 states instead of each furnace individually meeting the applicable Table 1 and 2 NOx limit, an operator of multiple furnaces or a furnace battery may choose to meet the applicable emission limit by considering the multiple furnaces or furnace battery as a single unit. An operator choosing this option shall conform to the provisions of Sections 9.1 through 9.4.8.5 for NOx.

Pursuant to section 9.4.1, if the operator chooses to treat the furnaces as a furnace battery, the furnace shall be subject to a 10% air quality benefit in accordance with 40 CFR Part 51 Subpart U. The maximum emission rate shall be at least 10% lower than the applicable limit in section 5.1.

Gallo Glass Company operates a furnace battery. Therefore, the furnace battery must meet an emission limits of:

Until December 31, 2023

NOx Limit = $1.5 \text{ lb/ton} - 1.5 \text{ lb/ton} \times 0.1 = 1.4 \text{ lb/ton}$ of glass produced

The furnace battery is limited to a NOx limit of 1.3 lb/ton. Therefore, compliance is expected.

On and after January 1, 2024 (Phase I)

NOx Limit = 1.1 lb/ton - 1.1 lb/ton x 0.1 = 0.99 lb/ton of glass produced

Gallo Glass Company has proposed to comply with furnace battery Phase I NOx limit of 0.99 lb/ton under this project. The applicant is required to and will verify compliance with this limit via source testing and CEMS on an on-going basis. Compliance is expected with this limit.

CO and VOC Emission Limits

Section 5.2.1 identifies CO and VOC emission limits for glass melting furnaces. The following applicable emission limits pursuant to Section 5.2 for glass furnaces are:

Table 3 – CO and VOC Emission Limits – rolling three hour average (ppmv limits are referenced at 8% O2 and dry stack conditions)			
Furnace Type	rnace Type Firing Technology		VOC Limit
Container Glass or Fiberglass	100% air fired furnace	300 ppmv	20 ppmv
	Oxygen-assisted or Oxy-fuel furnace	1.0 lb/ton glass produced	0.25 lb/ton glass produced

Section 5.2.2 states that instead of each furnace individually meeting the applicable CO or VOC or both emission limit in Table 2, an operator may choose to meet the CO or VOC or both emission limit for multiple furnaces or furnace batteries by considering the multiple furnaces or furnace battery as a single unit. An operator choosing this option shall conform to the provisions of Sections 9.1 through 9.4.8.5 for CO emissions or VOC emissions or both.

Pursuant to section 9.4.1, if the operator chooses to treat the furnaces as a furnace battery, the furnace shall be subject to a 10% air quality benefit in accordance with 40 CFR Part 51 Subpart U.

Gallo Glass Company operates a furnace battery. Therefore, the furnace battery must meet an emission limits of:

CO Limit = $1.0 \text{ lb/ton} - 1.0 \text{ lb/ton} \times 0.1 = 0.9 \text{ lb/ton}$ of glass produced VOC Limit = $0.25 \text{ lb/ton} - 0.25 \text{ lb/ton} \times 0.1 = 0.23 \text{ lb/ton}$ of glass produced

The proposed emission limits are lower than the above CO and VOC limit. Therefore, compliance is expected.

SOx Emission Limits

Section 5.3.1 identifies SOx emission limits for glass melting furnaces. The following applicable emission limits pursuant to Section 5.2 for glass furnaces are:

Table 4 – SOx Emission Limits (lb/ton glass produced) in effect through December 31, 2023			
Furnace Type Firing Technology		SOx Limit	
Container Glass	Oxy-fuel furnaces and ≥ 25.0% of total cullet is mixed color cullet	1.1 ^B	
	All other container glass furnaces	0.90 ^B	

^BRolling 30-day average

Table 5 – SOx Emission Limits (lb/ton glass produced) in effect on and after January 1, 2024			
Furnace Type Firing Technology		SOx Limit	
Container Glass	All technologies	0.85 ^B	

^BRolling 30-day average

Section 5.3.3 states instead of each furnace individually meeting the applicable SOx limit in Table 3, an operator may choose to meet the SOx limit for multiple furnaces or furnace batteries by considering the multiple furnaces or furnace battery as a single unit. An operator choosing this option shall conform to the provisions of Sections 9.1 through 9.7.8.5 for SOx emissions.

Pursuant to section 9.4.1, if the operator chooses to treat the furnaces as a furnace battery, the furnace shall be subject to a 10% air quality benefit in accordance with 40 CFR Part 51 Subpart U.

Gallo Glass Company operates a furnace battery. Therefore, the furnace battery must meet an emission limits of:

Until December 31, 2023

SOx Limit = $1.1 \text{ lb/ton} - 1.1 \text{ lb/ton} \times 0.1 = 0.99 \text{ lb/ton}$ of glass produced for units with > 25.0% color cullet

SOx Limit = 0.90 lb/ton - 0.90 lb/ton x 0.1 = 0.81 lb/ton of glass produced for units with < 25.0% color cullet

The furnace battery is limited to SOx limits of 0.79 lb/ton of glass produced for <25% mixed color cullet and 0.95 lb/ton of glass produced for >25% color cullet. Therefore, continued compliance is expected.

On and after January 1, 2024 (Phase I)

SOx Limit = 0.85 lb/ton - 0.85 lb/ton x 0.1 = 0.77 lb/ton of glass produced

Gallo Glass Company has proposed to comply with furnace battery SOx limit of 0.77 lb/ton under this project. The applicant is required to and will verify compliance with this limit via source testing and CEMS on an on-going basis. Compliance is expected with this limit.

PM₁₀ Emission Limits

Section 5.4.1 identifies PM₁₀ emission limits for glass melting furnaces. The following applicable emission limits pursuant to Section 5.1 for glass furnaces are:

Table 6 – PM ₁₀ Emission Limits (lb/ton glass produced) Block 24-hour average			
Furnace Type Firing Technology		PM ₁₀ Limit	
Container Glass	All technologies	0.50	

Section 5.4.2 states instead of each furnace individually meeting the applicable PM_{10} limit in Table 4, an operator may choose to meet the PM_{10} limit for multiple furnaces or furnace batteries by considering the multiple furnaces or furnace battery as a single unit. An operator choosing this option shall conform to the provisions of Sections 9.1 through 9.4.8.5 for PM_{10} emissions.

Pursuant to section 9.4.1, if the operator chooses to treat the furnaces as a furnace battery, the furnace shall be subject to a 10% air quality benefit in accordance with 40 CFR Part 51 Subpart U.

PM₁₀ Limit = 0.50 lb/ton - 0.50 lb/ton x 0.1 = 0.45 lb/ton of glass produced

Gallo Glass Company has proposed to comply with furnace battery SOx limit of 0.18 lb/ton of glass produced under this project. The applicant is required to and will verify compliance with this limit via source testing. Compliance is expected with this limit.

Start-up Requirements

Section 5.5.1 requires that the operator shall submit a request for a start-up exemption to the APCO in conjunction with or in advance of an application for Authority to Construct (ATC) associated with a furnace rebuild. This project is not for a furnace rebuild; therefore, this section does not apply.

Section 5.5.2 requires that the operator shall submit to the APCO, ARB, and EPA any information deemed necessary by the APCO, ARB, or EPA to determine the appropriate length of start-up exemption.

Section 5.5.3 start-up exemptions shall begin upon activation of the primary combustion system.

Section 5.5.4 states that the approved length of the start-up exemption shall be determined by the APCO, CARB, and EPA at the time of the ATC issuance, but in any case, it shall not exceed the amount of time specified in Table 8, which for container glass is a minimum of 70 days.

Gallo Glass Company has not formally requested a start-up exemption during which the rule limits do not apply. However, the District has allowed to achieve compliance with the limits within 60 days of startup under the ATC issued under this project.

Section 5.5.5 states that during start-up period, the stoichiometric ratio of the primary furnace combustion system shall not exceed 5% excess oxygen, as calculated from the actual fuel and oxidant stream flow measurements for combustion in the glass melting furnace, except during the time when the oxidant stream for an oxy-fuel fired furnace contains at least 50% oxygen.

As stated previously, Gallo Glass Company operates oxy-fuel furnaces where more than 50% of the oxidant for the fuel is provided from enriched oxygen stream from their on-site oxygen plant. As such, this section this section does not apply.

Section 5.5.6 requires that the emission control system shall be in operation as soon as technologically feasible during start-up to minimize emissions.

The exhaust from the furnaces is discharged through a shared dry sorbent scrubber injection and CDC/ESP controls. The exhaust temperature is expected to stay within an operating range of these technologies, and are expected to abate emissions to abate emissions to optimal levels during the startup. Therefore, continued compliance is expected with this section.

Section 5.5.7 states that notifications shall be performed and records shall be kept in accordance with section 6.6. The following existing conditions will be listed on each Authority to Construct for the furnaces:

- The permittee shall notify the District at least 24 hours prior to initiating idling, shutdown, or startup of the glass furnace and this notification shall include: The date and time of the start of the exempt operation, reason for performing the operation, and an estimated completion date. The permittee shall notify the District within 24 hours after completion of the operation and shall maintain operating records and/or support documentation necessary to claim exemption. [District Rule 4354]
- The emission control systems shall be in operation whenever conditions are consistent with equipment manufacturer's specifications during startup, idling and shutdown periods. [District Rule 4354]

Shutdown Requirements

Section 5.6.1 requires that the duration of shutdown, as measured from the time the furnace operations drop below the idle threshold specified in Section 3.17 to when all emissions from the furnace cease, shall not exceed 20 days. The following condition(s) in existing permits ensures on-going compliance with this section:

 The duration of a furnace shutdown shall not exceed 20 days, measured from the time furnace operations drop below the idle threshold specified in Section 3.17 of District Rule 4354 to when all emissions from the furnace cease. [District Rule 4354] Section 5.6.2 requires that the emission control system shall be in operation whenever technologically feasible during shutdown to minimize emissions. The following condition(s) in existing permits ensures on-going compliance with this section:

 The emission control systems shall be in operation whenever conditions are consistent with equipment manufacturer's specifications during startup, idling and shutdown periods. [District Rule 4354]

Section 5.6.3 states that notifications shall be performed and records shall be kept in accordance with section 6.6. The following condition(s) in existing permits ensures on-going compliance with this section:

 The permittee shall notify the District at least 24 hours prior to initiating idling, shutdown, or startup of the glass furnace and this notification shall include: The date and time of the start of the exempt operation, reason for performing the operation, and an estimated completion date. The permittee shall notify the District within 24 hours after completion of the operation and shall maintain operating records and/or support documentation necessary to claim exemption. [District Rule 4354]

Idling Requirements

Section 5.7.1 requires that the emission control system shall be in operation whenever technologically feasible during idling to minimize emissions. The following condition(s) in existing permits ensures on-going compliance with this section:

 The emission control systems shall be in operation whenever conditions are consistent with equipment manufacturer's specifications during startup, idling and shutdown periods. [District Rule 4354]

Section 5.7.2 requires that the NO $_X$, SO $_X$, PM $_{10}$, CO and VOC, and emissions during idling shall not exceed the amount as calculated using the following equation:

$$E_{i,max} = E_i * Capacity$$

Where,

 $E_{i,max}$ = maximum daily emission of pollutant i during idling, in pounds pollutant per day;

E_i = Applicable emission limit from Table 1, Table 2, Table 3, or Table 4 for pollutant i, in pounds pollutant per ton glass produced;

Capacity = Furnace's permitted glass production capacity in tons glass produced per day.

The following condition(s) in permits ensures on-going compliance with this section:

 NOx, CO, VOC, SOx, and PM10 emissions during idling shall not exceed the amount as calculated using the following equation: NOx, CO, VOC, SOx, or PM10 (lb/day) = Applicable emission limit (lb/ton) x Furnace permitted production capacity (tons/day). [District Rule 4354]

Section 5.7.3 states that notifications shall be performed and records shall be kept in accordance with section 6.6. The following condition(s) in existing permits ensures on-going compliance with this section:

 The permittee shall notify the District at least 24 hours prior to initiating idling, shutdown, or startup of the glass furnace and this notification shall include: The date and time of the start of the exempt operation, reason for performing the operation, and an estimated completion date. The permittee shall notify the District within 24 hours after completion of the operation and shall maintain operating records and/or support documentation necessary to claim exemption. [District Rule 4354]

Compliance Determination

Any source testing result, CEMS, or alternate emission monitoring method averaged value exceeding the applicable emission limits in Section 5.1, Section 5.2, Section 5.3, or Section 5.4 shall constitute a violation of the rule.

Gallo Glass Company is aware of the fact that they need to operate the furnace within the permitted limits and any source testing results, CEMS or metric exceeding above the limits constitute a violation of the respective permit and constitute a violation of this rule. Continued compliance is expected with this section.

Monitoring Requirements

NOx Emission Monitoring Requirements

Section 5.9.1 requires that the operator of any glass melting furnace shall implement a NOx CEMS that is approved, in writing, by the APCO and EPA, and that meets the requirements of Section 6.5. For a furnace battery, a single CEMS may be used to determine the total NOx emissions from all the furnaces provided the emission measurements are made at the common stack. The furnace battery at this facility has a NOx CEMS. Therefore, the requirements of this section of the rule are satisfied. The following existing conditions ensures on-going compliance with this section:

 The furnace shall have continuous monitoring systems for NOx and SOx. The monitoring devices shall have continuous recording devices, and all records shall be kept on site. [District Rules 1080 and 4354] One continuous emissions monitoring (CEM) system may be used for monitoring oxy-fuel fired furnaces #1, #2, #3, and #4 provided all of the exhaust gases of each of these furnaces are ducted to a common stack, and monitored down stream of the common stack. The CEMS shall comply with the requirements of 40 Code of Federal Regulations (CFR) Part 51, 40 CFR Parts 60.7 and 60.13, 40 CFR Part 60 Appendix B (Performance Specifications) and Appendix F (Quality Assurance Procedures) and the applicable sections of Rule 1080 (Stack Monitoring). [District Rule 4354]

CO and VOC Emission Monitoring Requirements

Section 5.9.2 requires that for each furnace subject to Table 2 CO limits, the operator shall implement a CO and VOC CEMS that meets the requirements of Section 6.5.1, and that is approved, in writing, by the APCO. In lieu of installing and operating a CEMS for CO or CEMS for VOC or both, an operator may propose key system operating parameter(s) and frequency of monitoring and recording. The alternate monitoring shall meet the requirements of Section 6.6.2. The operator shall obtain approval of the APCO and EPA for the specific key system operating parameter(s), monitoring frequency, and recording frequency used by the operator to monitor CO/VOC emissions. The operator shall monitor approved key system operating parameter(s) at the approved monitoring frequency to ensure compliance with the emission limit(s) during periods of emission-producing activities. Acceptable range(s) for key system operating parameter(s) shall be demonstrated through source test.

Section 5.9.2.4 states for the operator of multiple furnaces or a furnace battery utilizing Section 5.2.2 to comply with CO emission limits or VOC emission limits or both, a single parametric monitoring arrangement or a single CEMS may be used to determine the CO emissions or VOC emissions or both from all the furnaces provided that the multiple furnaces/furnace battery is subject to the provisions of Sections 9.1 through 9.4.8.5 and: For units using a CEMS - the emission measurements are made at the common stack; For units using a parametric monitoring arrangement – the key system operating parameters are representative of the combined exhaust stream.

The applicant is proposing to continue to monitor and record the oxygen to fuel ratio of the burners. The District has approved the monitoring of this key system operating parameter. The following existing conditions ensures on-going compliance with this section:

 The oxygen to fuel ratio shall be maintained within the range shown by the most recent source test to result in compliance with the CO and VOC limits of this permit. The acceptable range of the oxygen to fuel ratio shall be established during the initial source test and during each subsequent annual source test. [District Rule 4354]

SOx Emission Monitoring Requirements

Section 5.9.3 requires for each furnace subject to Section 5.3, the operator to implement a SOx CEMS that meets the requirements of Section 6.5.1 and that is approved, in writing, by the APCO and EPA. In lieu of installing and operating a CEMS for SOx, an operator may propose key system operating parameter(s) and frequency of monitoring and recording. The alternate monitoring shall meet the requirements of Section 6.6.2. The operator shall obtain approval of the APCO and EPA for the specific key system operating parameter(s), monitoring frequency, and recording frequency used by the operator to monitor SOx emissions. The operator shall monitor approved key system operating parameter(s) at the approved monitoring frequency to ensure compliance with the emission limit(s) during periods of emission-producing activities. Acceptable range(s) for key system operating parameter(s) shall be demonstrated through source test.

Section 5.9.3.3 states for the operator of multiple furnaces or a furnace battery utilizing Section 5.3.4 to comply with SOx emission limits, a single parametric monitoring arrangement or a single CEMS may be used to determine the SOx emissions from all the furnaces provided that the multiple furnaces/furnace battery is subject to the provisions of Sections 9.1 through 9.4.8.5 and one of the following: For units using a CEMS - the emission measurements are made at the common stack; For units using a parametric monitoring arrangement – the key system operating parameters are representative of the combined exhaust stream.

The facility uses a CEMS on the common stack to show compliance with the SOx limits for the furnace battery The following existing conditions ensure on-going compliance with this section:

- The furnace shall have continuous monitoring systems for NOx and SOx. The monitoring devices shall have continuous recording devices, and all records shall be kept on site. [District Rules 1080 and 4354]
- One continuous emissions monitoring (CEM) system may be used for monitoring oxy-fuel fired furnaces #1, #2, #3, and #4 provided all of the exhaust gases of each of these furnaces are ducted to a common stack, and monitored down stream of the common stack. The CEMS shall comply with the requirements of 40 Code of Federal Regulations (CFR) Part 51, 40 CFR Parts 60.7 and 60.13, 40 CFR Part 60 Appendix B (Performance Specifications) and Appendix F (Quality Assurance Procedures) and the applicable sections of Rule 1080 (Stack Monitoring). [District Rule 4354]

PM₁₀ Emission Monitoring Requirements

Section 5.9.4 requires the operator to propose key system operating parameter(s) and frequency of monitoring and recording. The parametric monitoring shall meet the requirements of Section 6.5.1. The operator shall obtain approval of the APCO and EPA for the specific key system operating parameter(s), monitoring frequency, and recording frequency used by the operator to monitor PM₁₀ emissions. The operator shall monitor approved key system operating parameter(s) at the approved monitoring frequency to ensure compliance with the emission limit(s) during periods of emission-producing activities. Acceptable range(s) for key system operating parameter(s) shall be demonstrated through source test. In lieu of parametric monitoring, the operator may elect to implement a PM₁₀ CEMS that meets the requirements of Section 6.6.1, and that is approved, in writing, by the APCO and EPA.

Section 5.9.4.3 states for the operator of multiple furnaces or a furnace battery utilizing Section 5.4.2 to comply with PM $_{10}$ emission limits, a single parametric monitoring arrangement or a single CEMS may be used to determine the total PM $_{10}$ emissions from all the furnaces provided that the multiple furnaces/furnace battery is subject to the provisions of Sections 9.1 through 9.4.8.5 and one of the following: For units using a CEMS - the emission measurements are made at the common stack; For units using a parametric monitoring arrangement – the key system operating parameters are representative of the combined exhaust stream.

In lieu of installing and operating a CEMS for PM₁₀, the operator has proposed to use parametric monitoring to show compliance with the Rule 4354 PM₁₀ monitoring requirements.

The existing permits currently require monitoring and recording of the specific power of the electrostatic precipitator. Specific power is a measure of the voltage and current supplied to the electrostatic precipitator. The District has approved the monitoring and recording of this key system operating parameter. The following existing conditions ensure on-going compliance with this section:

- Devices to measure the primary and secondary voltage and current of the electrostatic precipitator shall be maintained in accordance with the manufacturer's specifications. [District Rule 4354 and 40 CFR Part 64]
- When the electrostatic precipitator is in operation, the specific power of the electrostatic
 precipitator shall be at least 70 milliwatts/acfm except during the bypass episodes allowed
 by this permit. [District Rules 2520, §9.3.2 and 4354 and 40 CFR Part 64]

Routine Maintenance of Add-On Emission Control Systems

Section 5.10 requires during routine maintenance of an add-on emission control system, an operator of a glass melting furnace subject to the provisions of Sections 5.1 through 5.4 is exempt from these limits if: Routine maintenance in each calendar year does not exceed 144 hours total for all add-on controls; and Routine maintenance is conducted in a manner consistent with good air pollution control practices for minimizing emissions. The following existing condition ensures on-going compliance with this section:

• The emission limits of this permit shall not apply during routine maintenance of the respective add-on control systems. The routine maintenance in each calendar year shall not exceed 144 hours total for all add-on controls and routine maintenance shall be conducted in a manner consistent with good air pollution control practices for minimizing air emissions. Routine maintenance includes, but is not limited to: 1) Calibration and scheduled parts replacement of CEMS equipment per manufacturer's recommendations, 2) Cleaning of particulate control devices and stack ductwork to ensure optimal performance, and 3) Necessary repairs to ensure optimal performance of all parts of the system. [District Rules 2201 and 4354]

Administrative Requirements

Section 6.1 requires that each glass melting furnace's PTO shall include the furnace's permitted glass production capacity in units of tons of glass pulled per day as a permit condition.

Each of the furnaces has a permitted glass production capacity in units of tons of glass pulled per day stated as a permit condition. Therefore, this section of the rule is satisfied.

Section 6.2.1 requires operators to maintain daily records of the following items:

- Total hours of operation;
- The quantity of glass pulled from each furnace;
- NOx emission rate in lb/ton glass pulled;
- CO emission rate in units matching Table 2, if a CEMS is used;
- VOC emission rate in units matching Table 2, if a CEMS is used;
- SOx emission rate in lb/ton glass pulled, if a CEMS is used;
- PM₁₀ emission rate in lb/ton glass pulled, if a CEMS is used;
- For container glass furnaces that are oxy-fuel fired:
 - The weight of mixed color mix cullet used;
 - The total amount of cullet used by weight; and
 - The ratio, expressed in percent, of mixed color mix weight to total cullet weight.

Section 6.2.2 requires that for pollutants monitored using an approved parametric monitoring arrangement, operators shall record the operating values of the key system operating parameters at the approved recording frequency.

Section 6.2.3 requires that operators maintain records of the following items:

- Source tests and source test results;
- The acceptable range for each approved key system operating parameter, as established during source test;
- Maintenance and repair; and
- Malfunction

The following existing conditions ensure on-going compliance with this section:

- When the electrostatic precipitator is in operation, the specific power of the electrostatic precipitator shall be continuously monitored and recorded. [District Rules 2201 and 4354 and 40 CFR Part 64]
- Permittee shall keep a record of the daily hours of operation, the amount of glass pulled from the furnace (in tons), the NOx emissions (in lb/ton of glass pulled), the SOx emissions (in lb/ton of glass pulled), the weight of mixed color mix cullet used, the total amount of cullet used (by weight) and the ratio of the mixed color cullet weight to the total cullet weight (in percent). [District Rules 2201 and 4354]
- The oxygen to fuel ratio shall be continuously monitored and recorded. [District Rule 4354]
- The permittee shall maintain daily records of the aggregated NOx emissions. [District Rules 2520 and 4354]
- The permittee shall maintain the burner oxygen to fuel ratio records required by this permit.
 [District Rules 2201 and 4354]
- A record of the cumulative annual number of hours that the emission control system is either fully or partially bypassed shall be kept. The record shall be updated at least weekly. [District Rules 2201 and 4354]
- When the electrostatic precipitator is in operation, the permittee shall maintain daily records of the specific power of the electrostatic precipitator (in milliwatts/acfm). [District Rules 2201, 4354 and 40 CFR Part 64]

Section 6.2.4 requires that the operator retain records specified in Sections 6.3.1 through 6.3.3 for a period of five years; make the records available on site during normal business hours to the APCO, ARB, or EPA; and submit the records to the APCO, ARB, or EPA upon request.

The following existing condition ensures on-going compliance with this section:

 All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 2201 and 4354 and 40 CFR Part 64]

Compliance Source Testing

Section 6.3.1 requires that each glass melting furnace or a furnace battery to be source tested at least once every calendar year, but not more than every 18 months and not sooner than every 6 months to demonstrate compliance with the applicable requirements of Section 5.0. During annual source testing, compliance shall be demonstrated with the applicable short term emission limit (i.e. the applicable emission limit with the shortest averaging period). Sources exempt under Section 4.2 are not required to source test for the exempted pollutants.

The following existing conditions ensure on-going compliance with this section:

- Source testing to demonstrate compliance with permit conditions and all rules and regulations for both natural gas and LPG shall be conducted within 60 days after the end of the start-up exemption, and at least once every calendar year thereafter. NOx and CO testing shall be performed using CARB Method 100. VOC testing shall be performed using EPA methods 25A. PM10 testing shall be performed using EPA methods 201 and 202, or CARB methods 501 and 5. SOx testing shall be performed using EPA Method 8 and CARB Method 1-100. [District Rules 1081, 2201, 2520, §9.3.2; and 4354]
- Source testing when firing on LPG fuel need not be performed if the LPG fuel usage for this furnace does not exceed 100 hours during any one calendar year. A source test shall be performed within 90 days after this furnace exceeds 100 hours of operation, on LPG, on an annual basis. [District Rule 1081]
- Source testing shall be conducted by a CARB-certified source testing contractor. Source
 testing shall be conducted using the methods and procedures approved by the District. The
 District must be notified 30 days prior to any compliance source test, and a source test plan
 must be submitted for approval at least 15 days prior to source testing. The results of each
 source test shall be submitted to the District within 60 days after the source test date. [District
 Rule 1081]
- PM and PM10 source testing shall be conducted down stream of the particulate matter control equipment in the common stack. Furnaces #1, #2, #3, and #4 must operate simultaneously during source testing unless prior approval is obtained from the District. [District Rule 1081]

Section 6.3.2 requires that source test conditions to be representative of normal operations, but not less than 60 percent of the permitted glass production capacity.

The following existing condition ensure on-going compliance with this section:

 Source test conditions shall be representative of operations equal to or greater than 60 percent of the fuel use capacity for each furnace as stated in the Permit to Operate. [District Rule 4354] Section 6.3.3 requires that for operators using alternative monitoring systems, during the source test, the operator shall monitor and record, at a minimum, all operating data for each parameter, fresh feed rate, and flue gas flow rate and submit this data with the test report.

The facility does not use alternative monitoring systems. Therefore, the requirements of this section are not applicable.

Section 6.3.4 requires that during source testing in accordance with Section 6.4.1, the arithmetic average of three (3) 30-consecutive-minute test runs shall be used to determine compliance with NOx, CO, VOC, and SOx emission limits.

The following existing condition ensure on-going compliance with this section:

 For source testing purposes, the arithmetic average of three 30-consecutive-minute test runs shall be used to determine compliance with NOx, CO, VOC, and SOx emission limits. [District Rule 4354]

Section 6.3.5 requires that during source testing in accordance with Section 6.4.1, the arithmetic average of three (3) 60-consecutive-minute test runs shall be used to determine compliance with PM₁₀ emission limits.

The following existing condition ensure on-going compliance with this section:

 For source testing purposes, the arithmetic average of three 60-consecutive-minute test runs shall be used to determine compliance with PM10 emission limits. [District Rule 4354]

Section 6.3.6 requires that for a given pollutant, if two of the three runs individually demonstrate emissions above the applicable limit, the test cannot be used to demonstrate compliance for the furnace, even if the averaged emissions of all three test runs is less than the applicable limit.

The following existing condition ensure on-going compliance with this section:

 For source testing purposes, if two of the three runs individually demonstrate emissions above the applicable limit, the test cannot be used to demonstrate compliance for the furnace, even if the averaged emissions of all three test runs is less than the applicable limit. [District Rule 4354]

Test Methods

Section 6.5 requires that compliance with the requirements of Section 5.0 shall be determined in accordance with the following source test procedures or their equivalents as approved by the EPA, ARB, and the APCO:

- Oxides of nitrogen EPA Method 7E, EPA Method 19, or CARB Method 100.
- Carbon monoxide (ppmv) EPA Method 10, or CARB Method 100.

- Volatile Organic Compound (ppmv) EPA Method 25A expressed in terms of carbon or ARB Method 100. EPA Method 18 or CARB Method 422 shall be used to determine emissions of exempt compounds.
- Stack gas oxygen, carbon dioxide, excess air, and dry molecular weight EPA Method 3 or 3A, or CARB Method 100.
- Stack gas velocity and volumetric flow rate EPA Method 2.
- Oxides of sulfur EPA Method 6C, EPA Method 8, or CARB Method 100.
- Filterable PM₁₀ emissions EPA Method 5; EPA Method 201; or EPA Method 201A. An operator choosing EPA Method 5 shall count all PM collected as PM₁₀.
- Condensable PM 10 emissions EPA Method 202.

The following existing condition ensure on-going compliance with this section:

Source testing to demonstrate compliance with permit conditions and all rules and regulations for both natural gas and LPG shall be conducted within 60 days after the end of the start-up exemption, and at least once every calendar year thereafter. NOx and CO testing shall be performed using CARB Method 100. VOC testing shall be performed using EPA methods 25A. PM10 testing shall be performed using EPA methods 201 and 202, or CARB methods 501 and 5. SOx testing shall be performed using EPA Method 8 and CARB Method 1-100. [District Rules 1081, 2201, 2520, §9.3.2; and 4354]

Emissions Monitoring Systems

Section 6.5.1 of this rule requires that an approved CEMS shall comply with all of the following requirements:

- 40 CFR Part 51;
- 40 CFR Part 60.7 (Notification and Record Keeping);
- 40 CFR Part 60.13 (Monitoring Requirements);
- 40 CFR Part 60 Appendix B (Performance Specifications):
- 40 CFR Part 60 Appendix F (Quality Assurance Procedures); and
- Applicable sections of Rule 1080 (Stack Monitoring).

The following existing condition ensure on-going compliance with this section:

One continuous emissions monitoring (CEM) system may be used for monitoring oxy-fuel fired furnaces #1, #2, #3, and #4 provided all of the exhaust gases of each of these furnaces are ducted to a common stack, and monitored down stream of the common stack. The CEMS shall comply with the requirements of 40 Code of Federal Regulations (CFR) Part 51, 40 CFR Parts 60.7 and 60.13, 40 CFR Part 60 Appendix B (Performance Specifications) and Appendix F (Quality Assurance Procedures) and the applicable sections of Rule 1080 (Stack Monitoring). [District Rule 4354, 5.9 and 6.6.1]

Section 6.5.2 requires an approved alternate emission monitoring method to be capable of determining the furnace emissions on an hourly basis and comply with 40 CFR 64 (Compliance Assurance Monitoring) and 40 CFR 60.13 (Monitoring Requirements).

The facility does not use alternate emission monitoring systems. Therefore, the requirements of this section are not applicable.

Notifications and Records for Start-up, Shutdown, and Idling

Section 6.6 requires the operator of any glass melting furnace claiming an exemption under Section 4.4 notify the APCO at least 24 hours before initiating idling, shutdown, or start-up. The notification shall include: date and time of the start of the exempt operation, reason for performing the operation, and an estimated completion date. The operator shall notify the APCO within 24 hours after completion of the start-up, shutdown, or idling. The operator claiming exemption under Section 4.4 shall maintain all operating records/support documentation necessary to support claim of exemption. Records/support documentation required by Section 6.7.3 shall meet the following requirements: the records/support documentation shall be retained on-site for five years; the records/support documentation shall be made available to the APCO, ARB, or EPA during normal business hours; and the records/support documentation shall be submitted to the APCO, ARB, or EPA upon request.

The following existing condition ensure on-going compliance with this section:

• The permittee shall notify the District at least 24 hours prior to initiating idling, shutdown, or startup of the glass furnace and this notification shall include: The date and time of the start of the exempt operation, reason for performing the operation, and an estimated completion date. The permittee shall notify the District within 24 hours after completion of the operation and shall maintain operating records and/or support documentation necessary to claim exemption. [District Rule 4354]

Calculations

Section 8.1 requires the pollutant mass emission rate in lb/hr shall be converted to lb pollutant/ton of glass pulled according to the following equation:

$$lb \; emitted/\; ton \; glass \; pulled = \; \frac{lb/hr \; emitted}{Pull \; rate \; in \; tons/hr}$$

Section 8.3 requires the operator of a oxy-fuel fired furnace, oxygen-assisted combustion furnace, or a furnace utilizing any fuel oxidants other than 100% ambient air, to submit to the APCO, ARB, and EPA for approval any methodologies and data that will be used to calculate emission rates for NOx, CO, and VOC if the methods are different than specified in Sections 8.1 or 8.2. Unless the operator received prior written approval from APCO, ARB, and EPA of all the calculation methods to be used that are different than specified in Sections 8.1 or 8.2, compliance with the emissions limits cannot be fully demonstrated, and it shall be deemed to be a violation of the rule.

The following existing condition ensure on-going compliance with this section:

The pollutant mass emission rate in lb/hr shall be converted to lb pollutant/ton of glass pulled as specified in Rule 4354. The operator of a oxy-fuel fired furnace, oxygen-assisted combustion furnace, or a furnace utilizing any fuel oxidants other than 100% ambient air, shall submit to the APCO, ARB, and EPA for approval any methodologies and data that will be used to calculate emission rates for NOx, CO, and VOC if the methods are different from those specified in Rule 4354. Unless the operator received prior written approval from APCO, ARB, and EPA of all the calculation methods to be used that are different from those specified in Rule 4354, compliance with the emissions limits cannot be fully demonstrated, and it shall be deemed to be a violation of the rule. [District Rule 4354]

Compliance is expected with this rule.

Rule 4801 Sulfur Compounds

A person shall not discharge into the atmosphere sulfur compounds, which would exist as a liquid or gas at standard conditions, exceeding in concentration at the point of discharge: 0.2 % by volume calculated as SO₂, on a dry basis averaged over 15 consecutive minutes.

The latest available source test for the furnace battery, dated December 11, 2019, indicates that the furnaces were operating with a sulfur concentration less than 2,000 ppmv (or 0.2 %). This project is not expected to increase the SO₂ concentration. Therefore, continued compliance is expected with this rule. The following existing condition ensures on-going compliance with this section:

 Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [Stanislaus County Rule 407 and District Rule 4801]

Compliance is expected with this rule.

California Health & Safety Code 42301.6 (School Notice)

The District has verified that this site is not located within 1,000 feet of a school. Therefore, pursuant to California Health and Safety Code 42301.6, a school notice is not required.

California Environmental Quality Act (CEQA)

CEQA requires each public agency to adopt objectives, criteria, and specific procedures consistent with CEQA Statutes and the CEQA Guidelines for administering its responsibilities under CEQA, including the orderly evaluation of projects and preparation of environmental documents. The District adopted its *Environmental Review Guidelines* (ERG) in 2001. The basic purposes of CEQA are to:

- Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities;
- Identify the ways that environmental damage can be avoided or significantly reduced;

- Prevent significant, avoidable damage to the environment by requiring changes in projects through the use of alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
- Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

Greenhouse Gas (GHG) Significance Determination

It is determined that no other agency has or will prepare an environmental review document for the project. Thus the District is the Lead Agency for this project. The project will not result in an increase in project specific greenhouse gas emissions. The District therefore concludes that the project would have a less than cumulatively significant impact on global climate change.

District CEQA Findings

The District is the Lead Agency for this project because there is no other agency with broader statutory authority over this project. The District performed an Engineering Evaluation (this document) for the proposed project and determined that for each emissions unit affected by the project the potential project emission increase is equal to or less than 2 lbs per day per pollutant. Therefore, the potential project emission increase is considerably below all annual criteria emissions CEQA significant thresholds. The activity will occur at an existing facility and involves negligible expansion of the existing or former use. Furthermore, the District determined that the activity will not have a significant effect on the environment. Therefore, the District finds that the activity is categorically exempt from the provisions of CEQA pursuant to CEQA Guideline § 15301 (Existing Facilities), and finds that the project is exempt per the common sense exemption that CEQA applies only to projects which have the potential for causing a significant effect on the environment (CEQA Guidelines §15061(b)(3)).

Indemnification Agreement/Letter of Credit Determination

According to District Policy APR 2010 (CEQA Implementation Policy), when the District is the Lead or Responsible Agency for CEQA purposes, an indemnification agreement and/or a letter of credit may be required. The decision to require an indemnity agreement and/or a letter of credit is based on a case-by-case analysis of a particular project's potential for litigation risk, which in turn may be based on a project's potential to generate public concern, its potential for significant impacts, and the project proponent's ability to pay for the costs of litigation without a letter of credit, among other factors.

The criteria pollutant emissions and toxic air contaminant emissions associated with the proposed project are not significant, and there is minimal potential for public concern for this particular type of facility/operation. Therefore, an Indemnification Agreement and/or a Letter of Credit will not be required for this project in the absence of expressed public concern.

IX. Recommendation

Compliance with all applicable rules and regulations is expected. Pending a successful EPA and public noticing period, issue ATCs N-1662-1-23, '-2-24, '-3-23, and '-4-25 subject to the permit conditions on the attached draft ATCs in **Appendix A**.

X. Billing Information

Annual Permit Fees			
Permit Number	Fee Schedule	Fee Description	Annual Fee
N-1662-1-23	3020-02-H	94 MMBtu/hr	\$1,238.00
N-1662-2-24	3020-02-H	75 MMBtu/hr	\$1,238.00
N-1662-3-23	3020-02-H	75 MMBtu/hr	\$1,238.00
N-1662-4-25	3020-02-H	90 MMBtu/hr	\$1,238.00

Appendices

A: Draft ATCs

B: Current PTOs

C: Previously issued ATC N-1662-1-21

D: Quarterly Net Emissions Change

E: Compliance Certification

APPENDIX A Draft ATCs

AUTHORITY TO CONSTRUCT

PERMIT NO: N-1662-1-23

ISSUANCE DATE: PRAF

LEGAL OWNER OR OPERATOR: GALLO GLASS COMPANY

MAILING ADDRESS: ATTN: ENVIRO HEALTH & SAFETY MANAGER

PO BOX 1230

MODESTO, CA 95353

LOCATION: 605 S SANTA CRUZ AVE

MODESTO, CA 95354

EQUIPMENT DESCRIPTION:

MODIFICATION OF GLASS FURNACE #1 WITH EIGHT 10 MMBTU/HR (EACH), TWO 5 MMBTU/HR (EACH), TWO 2 MMBTU/HR (EACH) BURNER (94 MMBTU/HR MAX HEAT CAPACITY), AND ASSOCIATED FORMING EQUIPMENT INCLUDING FOREHEARTHS, COATING, AND CHAIN BURNERS. THIS FURNACE IS DUCTED THROUGH A STACK COMMON TO PERMIT UNITS N-1662-1, N-1662-2, N-1662-3 AND N-1662-4. THE FURNACES ARE SERVED BY THE FOLLOWING SHARED EQUIPMENT: SOX SCRUBBER INCLUDING A LIME STORAGE SILO SERVED BY A BIN VENT FILTER, AN ELECTROSTATIC PRECIPITATOR, AND/OR FOUR TRI-MER UCF-500 CERAMIC FILTER DUST COLLECTORS: REDUCE PERMITTED NOX, SOX AND PM10 EMISSION LIMITS FOR DISTRICT RULE 4354 COMPLIANCE

CONDITIONS

- 1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
- 3. Authority to Construct (ATC) N-1662-1-21 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
- 4. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all-other governmental agencies which may pertain to the above equipment.

Samir Sheikh, Executive Director APCO

- 5. Particulate matter emissions shall not exceed 0.1 grain/dscf in concentration. [District Rule 4201 and Stanislaus County Rule 404] Federally Enforceable Through Title V Permit
- 6. The furnace shall be fired on natural gas and LPG only. [District Rule 2201] Federally Enforceable Through Title V Permit
- 7. The furnace shall have continuous monitoring systems for NOx and SOx. The monitoring devices shall have continuous recording devices, and all records shall be kept on site. [District Rules 1080 and 4354] Federally Enforceable Through Title V Permit
- 8. One continuous emissions monitoring (CEM) system may be used for monitoring oxy-fuel fired furnaces #1, #2, #3, and #4 provided all of the exhaust gases of each of these furnaces are ducted to a common stack, and monitored down stream of the common stack. The CEMS shall comply with the requirements of 40 Code of Federal Regulations (CFR) Part 51, 40 CFR Parts 60.7 and 60.13, 40 CFR Part 60 Appendix B (Performance Specifications) and Appendix F (Quality Assurance Procedures) and the applicable sections of Rule 1080 (Stack Monitoring). [District Rule 4354] Federally Enforceable Through Title V Permit
- 9. The facility shall install and maintain equipment, facilities, and systems compatible with the District's CEM data polling software system and shall make CEM data available to the District's automated polling system on a daily basis. [District Rule 1080] Federally Enforceable Through Title V Permit
- 10. The common exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NOx, CO, and O2 analyzer during District inspections. The sampling ports shall be located in accordance with the CARB regulation titled California Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Source Emission Monitoring and Testing. [District Rule 1081] Federally Enforceable Through Title V Permit
- 11. The permittee shall notify the District at least 24 hours prior to initiating idling, shutdown, or startup of the glass furnace and this notification shall include: The date and time of the start of the exempt operation, reason for performing the operation, and an estimated completion date. The permittee shall notify the District within 24 hours after completion of the operation and shall maintain operating records and/or support documentation necessary to claim exemption. [District Rule 4354] Federally Enforceable Through Title V Permit
- 12. The emission control systems shall be in operation whenever conditions are consistent with equipment manufacturer's specifications during startup, idling and shutdown periods. [District Rule 4354] Federally Enforceable Through Title V Permit
- 13. The duration of a furnace shutdown shall not exceed 20 days, measured from the time furnace operations drop below the idle threshold specified in Section 3.17 of District Rule 4354 to when all emissions from the furnace cease. [District Rule 4354] Federally Enforceable Through Title V Permit
- 14. NOx, CO, VOC, SOx, and PM10 emissions during idling shall not exceed the amount as calculated using the following equation: NOx, CO, VOC, SOx, or PM10 (lb/day) = Applicable emission limit (lb/ton) x Furnace permitted production capacity (tons/day). [District Rule 4354] Federally Enforceable Through Title V Permit
- 15. The oxygen to fuel ratio shall be maintained within the range shown by the most recent source test to result in compliance with the CO and VOC limits of this permit. The acceptable range of the oxygen to fuel ratio shall be established during the initial source test and during each subsequent annual source test. [District Rule 4354] Federally Enforceable Through Title V Permit
- 16. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation E=3.59P^0.62 (P< 30 tph) or E=17.31P^0.16 (P> 30 tph). [District Rule 4202] Federally Enforceable Through Title V Permit
- 17. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [Stanislaus County Rule 407 and District Rule 4801] Federally Enforceable Through Title V Permit

- 18. Source testing to demonstrate compliance with permit conditions and all rules and regulations for both natural gas and LPG shall be conducted within 60 days after the end of the start-up exemption, and at least once every calendar year thereafter. NOx and CO testing shall be performed using CARB Method 100. VOC testing shall be performed using EPA method 25A. SOx testing shall be performed using EPA Method 8 or CARB Method 100. PM10 testing shall be performed using EPA methods 201 and 202, EPA methods 201a and 202, or CARB methods 501 and 5. In lieu of performing a source test for PM10, the results of CARB Method 5 or EPA Methods 5 and 202 may be used for compliance with the PM10 emissions limit. If this option is used, then all of the particulate emissions will be considered to be PM10. Alternative test methods as approved by EPA, ARB, and the District may also be used to address the source testing requirements of this permit. [District Rules 1081, 2201, 2520, §9.3.2; and 4354] Federally Enforceable Through Title V Permit
- 19. Source testing when firing on LPG fuel need not be performed if the LPG fuel usage for this furnace does not exceed 100 hours during any one calendar year. A source test shall be performed within 90 days after this furnace exceeds 100 hours of operation, on LPG, on an annual basis. [District Rule 1081] Federally Enforceable Through Title V Permit
- 20. Source testing shall be conducted by a CARB-certified source testing contractor. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to source testing. The results of each source test shall be submitted to the District within 60 days after the source test date. [District Rule 1081] Federally Enforceable Through Title V Permit
- 21. Source test conditions shall be representative of operations equal to or greater than 60 percent of capacity for each furnace as stated in the Permit to Operate. [District Rule 4354] Federally Enforceable Through Title V Permit
- 22. For source testing purposes, the arithmetic average of three 30-consecutive-minute test runs shall be used to determine compliance with NOx, CO, VOC, and SOx emission limits. [District Rule 4354] Federally Enforceable Through Title V Permit
- 23. For source testing purposes, the arithmetic average of three 60-consecutive-minute test runs shall be used to determine compliance with PM10 emission limits. [District Rule 4354] Federally Enforceable Through Title V Permit
- 24. For source testing purposes, if two of the three runs individually demonstrate emissions above the applicable limit, the test cannot be used to demonstrate compliance for the furnace, even if the averaged emissions of all three test runs is less than the applicable limit. [District Rule 4354] Federally Enforceable Through Title V Permit
- 25. PM and PM10 source testing shall be conducted downstream of the electrostatic precipitator and the ceramic filter dust collector in the common stack. Furnaces #1, #2, #3, and #4 must operate simultaneously during source testing unless prior approval is obtained from the District. [District Rule 1081] Federally Enforceable Through Title V Permit
- 26. An annual Relative Accuracy Test Audit (RATA) shall be performed on the continuous monitoring system as outlined in 40 CFR Part 60 Appendix B. [District Rule 1080] Federally Enforceable Through Title V Permit
- 27. The owner/operator shall perform a relative accuracy test audit (RATA) as specified by 40 CFR Part 60, Appendix F (CGAs and RATAs) and if applicable 40 CFR Part 75, Appendix B (linearity and RATAs) at least once every four calendar quarters and annually within 30 days of the anniversary date of the initial test. The permittee shall comply with the applicable requirements for quality assurance testing and maintenance of the continuous emission monitor equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F. [District Rule 1080] Federally Enforceable Through Title V Permit
- 28. An exceedance of a NOx or SOx emission limit as indicated by the CEMS shall be reported by the operator to the APCO within 24 hours. The notification shall include 1) name and location of the facility, 2) identification of furnace(s) causing the exceedances, 3) calculation of actual NOx, CO and VOC emissions, and 4) corrective actions and schedules to complete the work. [District Rule 1080 and Stanislaus County Rule 1080] Federally Enforceable Through Title V Permit
- 29. {2251} The owner or operator shall, upon written notice from the APCO, provide a summary of the data obtained from the CEM systems. This summary of data shall be in the form and the manner prescribed by the APCO. [District Rule 1080, 7.1] Federally Enforceable Through Title Permit

- 30. Records shall be maintained and shall include: the occurrence and duration of any start-up, shutdown or malfunction, performance testing, evaluations, calibrations, checks, adjustments, any periods during which a continuous monitoring system or monitoring device is inoperative, maintenance of any CEMS that have been installed pursuant to District Rule 1080, and emission measurements. [District Rule 1080] Federally Enforceable Through Title V Permit
- 31. The operator shall notify the APCO no later than one hour after the detection of a breakdown of the CEMS. The operator shall inform the APCO of the intent to shut down the CEMS at least 24 hours prior to the event. [District Rule 1100] Federally Enforceable Through Title V Permit
- 32. The permittee shall submit a written report including copies of any Equipment Breakdown reports and/or pertinent variance decisions to the APCO for each calendar quarter, within 30 days of the end of the quarter, including: time intervals, data and magnitude of excess emissions, nature and cause of excess emissions (if known), corrective actions taken and preventive measures adopted; averaging period used for data reporting shall correspond to the averaging period for each respective emission standard; applicable time and date of each period during which the CEM was inoperative (except for zero and span checks) and the nature of system repairs and adjustments; and a negative declaration when no excess emissions occurred. [District Rule 1080] Federally Enforceable Through Title V Permit
- 33. Upon notice by the District that the facility's CEM system is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the CEM data is sent to the District by a District-approved alternative method. [District Rule 1080] Federally Enforceable Through Title V
- 34. Results of continuous emissions monitoring shall be reduced according to the procedure established in 40 CFR, Part 51, Appendix P, paragraphs 5.0 through 5.3.3, or by other methods deemed equivalent by mutual agreement with the District, the ARB, and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit
- 35. Cylinder gas audits (CGAs) of continuous emission monitors shall be conducted quarterly, except during quarters in which relative accuracy and total accuracy testing is performed, in accordance with EPA guidelines. The District shall be notified prior to completion of the audits. Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rule 1080] Federally Enforceable Through Title V Permit
- 36. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4201, Stanislaus County Rule 404, District Rule 4202 and Stanislaus County Rule 405. A permit shield is granted from these requirements. [District Rule 2520, §13.2] Federally Enforceable Through Title V Permit
- 37. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4801 and Stanislaus County Rule 407. A permit shield is granted from these requirements. [District Rule 2520, §13.2] Federally Enforceable Through Title V Permit
- 38. The requirements of District Rule 4301 and Stanislaus County Rule 408 were determined to not apply to this unit because the unit does not utilize indirect heat transfer. A permit shield is granted from these requirements. [District Rule 2520, §13.2] Federally Enforceable Through Title V Permit
- 39. The requirements of 40 CFR Part 60 Subpart CC were determined not to apply to this unit because the unit was constructed prior to the effective date in the regulation and has not been modified (according to the definition of "modified in the regulation"). A permit shield is granted from these requirements. [District Rule 2520 Section 13.2] Federally Enforceable Through Title V Permit
- 40. The requirements of 40 CFR Part 61, Subpart N were determined to not apply to this unit because the unit does not use commercial arsenic. A permit shield is granted from these requirements. [District Rule 2520, §13.2] Federally Enforceable Through Title V Permit
- 41. Any glass melting furnace located at an Area Source of hazardous air pollutants shall comply with 40 CFR Part 63 Subpart SSSSS (National Emission Standards for Hazardous Air Pollutants for Glass Manufacturing Area Sources). [40 CFR Part 63 Subpart SSSSS] Federally Enforceable Through Title V Permit
- 42. The quantity of glass produced shall not exceed 520.1 tons during any one day. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit

- 43. Except during periods of startup, shutdown, and idling, NOx emissions shall not exceed 0.99 pounds per ton of glass produced (over a rolling 30-day average). This performance based limit is to enforce the NOx emission reductions granted by certificate number N-106-2, as well as, Phase I NOx limit in Rule 4354. Any CEM measurement greater than 0.99 lb-NOx/ton of glass produced for each 30-day rolling average constitutes a violation of this emission limit. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 44. Except during periods of startup, shutdown, and idling, CO emissions shall not exceed 0.04 pounds per ton of glass produced. This performance based limit is to enforce the CO emission reductions granted by certificate number N-106-3. [District Rule 2201] Federally Enforceable Through Title V Permit
- 45. Except during periods of startup, shutdown, and idling, VOC emissions shall not exceed 0.02 pounds per ton of glass produced. [District Rule 2201] Federally Enforceable Through Title V Permit
- 46. Except during periods of startup, shutdown, and idling, the combined SOx emissions from permit units N-1662-1, N-1662-2, N-1662-3 and N-1662-4 shall not exceed 0.77 lb/ton of glass produced (over a rolling 30 day average). [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 47. Except during periods of startup, shutdown, idling, and during full or partial emission control system bypass episodes, PM10 emissions shall not exceed 0.18 lb/ton of glass produced. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 48. The PM10 emissions, during full or partial emission control system bypass episodes for routine maintenance, shall not exceed 0.71 lb/ton of glass produced. [District Rule 2201] Federally Enforceable Through Title V Permit
- 49. The emission limits of this permit shall not apply during routine maintenance of the respective add-on control systems. The routine maintenance in each calendar year shall not exceed 144 hours total for all controls and routine maintenance shall be conducted in a manner consistent with good air pollution control practices for minimizing air emissions. Routine maintenance includes, but is not limited to: 1) Calibration and scheduled parts replacement of CEMS equipment per manufacturer's recommendations, 2) Cleaning of particulate control devices and stack ductwork to ensure optimal performance, and 3) Necessary repairs to ensure optimal performance of all parts of the system. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 50. The PM10 emissions shall not exceed 22,936 pounds during the first calendar quarter, 23,190 pounds during the second calendar quarter, 23,445 pounds during the third calendar quarter and 23,445 pounds during the fourth calendar quarter. These limits are to enforce the PM10 emission reductions granted by certificate number N-161-4. [District Rule 2201] Federally Enforceable Through Title V Permit
- 51. The maximum throughput of lime received and stored in the lime storage silo shared with permit units N-1662-1, N-1662-2, N-1662-3 and N-1662-4 shall not exceed either of the following limits: 65 tons-lime/day or 110 tons-lime/quarter. [District Rule 2201] Federally Enforceable Through Title V Permit
- 52. PM10 emissions rate from the lime storage silo shared with permit units N-1662-1, N-1662-2, N-1662-3 and N-1662-4 shall not exceed 0.0049 lb-PM10/ton-lime stored. [District Rule 2201] Federally Enforceable Through Title V Permit
- 53. The facility shall not use commercial arsenic as a raw material in the production process. [40 CFR Part 61 Subpart N] Federally Enforceable Through Title V Permit
- 54. Each dust collector and bin vent filter shall be maintained and operated in the range that optimizes control efficiency as recommended by the manufacturer. [District Rule 2201] Federally Enforceable Through Title V Permit
- 55. Each dust collector and bin vent filter's cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
- 56. Material removed from each dust collector and bin vent filter shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
- 57. Replacement filters numbering at least 10% of the total number of filters in the largest dust collector, and for each type of filter, shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
- 58. A spare set of bags or filters shall be maintained on the premises at all times for the bin vent filter serving the lime storage silo shared with permit units N-1662-1, N-1662-3 and N-1662-4. [District Rule 2201] Federally Enforceable Through Title V Permit

- 59. Devices to measure the primary and secondary voltage and current of the electrostatic precipitator shall be maintained in accordance with the manufacturer's specifications. [District Rule 4354 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 60. When the electrostatic precipitator is in operation, the specific power of the electrostatic precipitator shall be at least 70 milliwatts/acfm except during the bypass episodes allowed by this permit. [District Rule 2520 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 61. The ceramic filter dust collectors shall each be equipped with a pressure differential gauge to indicate the pressure drop across the filters. The gauges shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rules 2201 and 4354 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 62. During operation of the ceramic filter dust collectors, the pressure differential gauge reading shall be 1 to 20 inches of water column. [District Rules 2201 and 4354 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 63. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7. [40 CFR Part 64] Federally Enforceable Through Title V Permit
- 64. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR Part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
- 65. The permittee shall comply with the record keeping and reporting requirements of 40 CFR Part 64.9. [40 CFR Part 64] Federally Enforceable Through Title V Permit
- 66. When the electrostatic precipitator is in operation, the specific power of the electrostatic precipitator shall be continuously monitored and recorded. [District Rules 2201 and 4354, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 67. Dust collector filters shall be inspected annually while in operation for evidence of particulate matter breakthrough and replaced as needed. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 68. Dust collector filters shall be inspected annually while not in operation for tears, scuffs, abrasions or hole that might interfere with the PM collection efficiency and shall be replaced as needed. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 69. Permittee shall keep a record of the daily hours of operation, the amount of glass pulled from the furnace (in tons), the NOx emissions (in lb/ton of glass pulled), the SOx emissions (in lb/ton of glass pulled), the weight of mixed color mix cullet used, the total amount of cullet used (by weight) and the ratio of the mixed color cullet weight to the total cullet weight (in percent). [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 70. Permittee shall maintain records of the following: 1) Source tests and source test results, 2) the acceptable range for each approved key system operating parameter, as established during source tests, 3) The operating values of the key system operating parameters at the approved recording frequency, 4) any maintenance and repair, and 5) any malfunctions. [District Rule 4354] Federally Enforceable Through Title V Permit
- 71. The pollutant mass emission rate in lb/hr shall be converted to lb pollutant/ton of glass pulled as specified in Rule 4354. The operator of a oxy-fuel fired furnace, oxygen-assisted combustion furnace, or a furnace utilizing any fuel oxidants other than 100% ambient air, shall submit to the APCO, ARB, and EPA for approval any methodologies and data that will be used to calculate emission rates for NOx, CO, and VOC if the methods are different from those specified in Rule 4354. Unless the operator received prior written approval from APCO, ARB, and EPA of all the calculation methods to be used that are different from those specified in Rule 4354, compliance with the emissions limits cannot be fully demonstrated, and it shall be deemed to be a violation of the rule. [District Rule 4354] Federally Enforceable Through Title V Permit
- 72. The oxygen to fuel ratio shall be continuously monitored and recorded. [District Rule 4354] Federally Enforceable Through Title V Permit
- 73. The permittee shall maintain daily records of the aggregated Nox emissions. [District Rules 2520, 9.3.2 and 4354] Federally Enforceable Through Title V Permit

- 74. The permittee shall maintain the burner oxygen to fuel ratio records required by this permit. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 75. A record of the PM10 emissions from this unit, in pounds per calendar quarter, shall be kept. [District Rule 2201] Federally Enforceable Through Title V Permit
- 76. A record of the cumulative annual number of hours that the emission control system is either fully or partially bypassed shall be kept. The record shall be updated at least weekly. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 77. The permittee shall keep a record of the cumulative annual hours of operation of the glass furnace on LPG fuel. [District Rule 2201] Federally Enforceable Through Title V Permit
- 78. When the electrostatic precipitator is in operation, the permittee shall maintain daily records of the specific power of the electrostatic precipitator (in milliwatts/acfm). [District Rules 2201, 4354, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 79. The operator shall monitor and record the pressure differential gauge reading of each ceramic filter dust collector at least once during each day that the units operate. [District Rules 2201 and 4354 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 80. Records of dust collector and bin vent filter maintenance, inspections and repairs shall be maintained. The records shall include, date of inspection, change outs of filter media, corrective action taken, and identification of the individual performing the inspection. [District Rules 2201 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 81. Records of daily and quarterly amount of lime transferred into the lime storage silo shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
- 82. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 2201 and 4354 and 40 CFR Part 64] Federally Enforceable Through Title V Permit



AUTHORITY TO CONSTRUCT

PERMIT NO: N-1662-2-24

ISSUANCE DATE: DRAF

LEGAL OWNER OR OPERATOR: GALLO GLASS COMPANY

MAILING ADDRESS: ATTN: ENVIRO HEALTH & SAFETY MANAGER

PO BOX 1230

MODESTO, CA 95353

LOCATION: 605 S SANTA CRUZ AVE

MODESTO, CA 95354

EQUIPMENT DESCRIPTION:

MODIFICATION OF GLASS FURNACE #2 WITH 10 NORTH AMERICAN PRAXAIR GEN III GAS/OXYGEN BURNERS (75 MMBTU/HR MAX HEAT CAPACITY), AND ASSOCIATED FORMING EQUIPMENT INCLUDING FOREHEARTHS, COATING, AND CHAIN BURNERS. THIS FURNACE IS DUCTED THROUGH A STACK COMMON TO PERMIT UNITS N-1662-1, N-1662-3, N-1662-3 AND N-1662-4. THE FURNACES ARE SERVED BY THE FOLLOWING SHARED EQUIPMENT: SOX SCRUBBER INCLUDING A LIME STORAGE SILO SERVED BY A BIN VENT FILTER, AN ELECTROSTATIC PRECIPITATOR, AND/OR FOUR TRI-MER UCF-500 CERAMIC FILTER DUST COLLECTORS: REDUCE PERMITTED NOX, SOX AND PM10 EMISSION LIMITS FOR DISTRICT RULE 4354 COMPLIANCE

CONDITIONS

- {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
- 3. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 4. Particulate matter emissions shall not exceed 0.1 grain/dscf in concentration. [District Rule 4201 and Stanislaus County Rule 404] Federally Enforceable Through Title V Permit
- 5. The furnace shall be fired on natural gas and LPG only. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all-other governmental agencies which may pertain to the above equipment.

Samir Sheikh, Executive Director APCO

- 6. The furnace shall have continuous monitoring systems for NOx and SOx. The monitoring devices shall have continuous recording devices, and all records shall be kept on site. [District Rules 1080 and 4354] Federally Enforceable Through Title V Permit
- 7. One continuous emissions monitoring (CEM) system may be used for monitoring oxy-fuel fired furnaces #1, #2, #3, and #4 provided all of the exhaust gases of each of these furnaces are ducted to a common stack, and monitored down stream of the common stack. The CEMS shall comply with the requirements of 40 Code of Federal Regulations (CFR) Part 51, 40 CFR Parts 60.7 and 60.13, 40 CFR Part 60 Appendix B (Performance Specifications) and Appendix F (Quality Assurance Procedures) and the applicable sections of Rule 1080 (Stack Monitoring). [District Rule 4354] Federally Enforceable Through Title V Permit
- 8. The facility shall install and maintain equipment, facilities, and systems compatible with the District's CEM data polling software system and shall make CEM data available to the District's automated polling system on a daily basis. [District Rule 1080] Federally Enforceable Through Title V Permit
- 9. The common exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NOx, CO, and O2 analyzer during District inspections. The sampling ports shall be located in accordance with the CARB regulation titled California Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Source Emission Monitoring and Testing. [District Rule 1081] Federally Enforceable Through Title V Permit
- 10. The permittee shall notify the District at least 24 hours prior to initiating idling, shutdown, or startup of the glass furnace and this notification shall include: The date and time of the start of the exempt operation, reason for performing the operation, and an estimated completion date. The permittee shall notify the District within 24 hours after completion of the operation and shall maintain operating records and/or support documentation necessary to claim exemption. [District Rule 4354] Federally Enforceable Through Title V Permit
- 11. The emission control systems shall be in operation whenever conditions are consistent with equipment manufacturer's specifications during startup, idling and shutdown periods. [District Rule 4354] Federally Enforceable Through Title V Permit
- 12. The duration of a furnace shutdown shall not exceed 20 days, measured from the time furnace operations drop below the idle threshold specified in Section 3.17 of District Rule 4354 to when all emissions from the furnace cease.

 [District Rule 4354] Federally Enforceable Through Title V Permit
- 13. NOx, CO, VOC, SOx, and PM10 emissions during idling shall not exceed the amount as calculated using the following equation: NOx, CO, VOC, SOx, or PM10 (lb/day) = Applicable emission limit (lb/ton) x Furnace permitted production capacity (tons/day). [District Rule 4354] Federally Enforceable Through Title V Permit
- 14. The oxygen to fuel ratio shall be maintained within the range shown by the most recent source test to result in compliance with the CO and VOC limits of this permit. The acceptable range of the oxygen to fuel ratio shall be established during the initial source test and during each subsequent annual source test. [District Rule 4354] Federally Enforceable Through Title V Permit
- 15. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation E=3.59P^0.62 (P< 30 tph) or E=17.31P^0.16 (P> 30 tph). [District Rule 4202] Federally Enforceable Through Title V Permit
- 16. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [Stanislaus County Rule 407 and District Rule 4801] Federally Enforceable Through Title V Permit
- 17. Source testing to demonstrate compliance with permit conditions and all rules and regulations for both natural gas and LPG shall be conducted within 60 days after the end of the start-up exemption, and at least once every calendar year thereafter. NOx and CO testing shall be performed using CARB Method 100. VOC testing shall be performed using EPA methods 201 and 202, EPA methods 201a and 202, or CARB methods 501 and 5. SOx testing shall be performed using EPA Method 8 and CARB Method 1-100. [District Rules 1081, 2201, 2520, §9.3.2; and 4354] Federally Enforceable Through Title V Permit

- 18. Source testing when firing on LPG fuel need not be performed if the LPG fuel usage for this furnace does not exceed 100 hours during any one calendar year. A source test shall be performed within 90 days after this furnace exceeds 100 hours of operation, on LPG, on an annual basis. [District Rule 1081] Federally Enforceable Through Title V Permit
- 19. Source testing shall be conducted by a CARB-certified source testing contractor. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to source testing. The results of each source test shall be submitted to the District within 60 days after the source test date. [District Rule 1081] Federally Enforceable Through Title V Permit
- 20. Source test conditions shall be representative of operations equal to or greater than 60 percent of capacity for each furnace as stated in the Permit to Operate. [District Rule 4354] Federally Enforceable Through Title V Permit
- 21. For source testing purposes, the arithmetic average of three 30-consecutive-minute test runs shall be used to determine compliance with NOx, CO, VOC, and SOx emission limits. [District Rule 4354] Federally Enforceable Through Title V Permit
- 22. For source testing purposes, the arithmetic average of three 60-consecutive-minute test runs shall be used to determine compliance with PM10 emission limits. [District Rule 4354] Federally Enforceable Through Title V Permit
- 23. For source testing purposes, if two of the three runs individually demonstrate emissions above the applicable limit, the test cannot be used to demonstrate compliance for the furnace, even if the averaged emissions of all three test runs is less than the applicable limit. [District Rule 4354] Federally Enforceable Through Title V Permit
- 24. PM and PM10 source testing shall be conducted downstream of the electrostatic precipitator and the ceramic filter dust collector in the common stack. Furnaces #1, #2, #3, and #4 must operate simultaneously during source testing unless prior approval is obtained from the District. [District Rule 1081] Federally Enforceable Through Title V Permit
- 25. An annual Relative Accuracy Test Audit (RATA) shall be performed on the continuous monitoring system as outlined in 40 CFR Part 60 Appendix B. [District Rule 1080] Federally Enforceable Through Title V Permit
- 26. The owner/operator shall perform a relative accuracy test audit (RATA) as specified by 40 CFR Part 60, Appendix F (CGAs and RATAs) and if applicable 40 CFR Part 75, Appendix B (linearity and RATAs) at least once every four calendar quarters and annually within 30 days of the anniversary date of the initial test. The permittee shall comply with the applicable requirements for quality assurance testing and maintenance of the continuous emission monitor equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F. [District Rule 1080] Federally Enforceable Through Title V Permit
- 27. An exceedance of a NOx or SOx emission limit as indicated by the CEMS shall be reported by the operator to the APCO within 24 hours. The notification shall include 1) name and location of the facility, 2) identification of furnace(s) causing the exceedances, 3) calculation of actual NOx, CO and VOC emissions, and 4) corrective actions and schedules to complete the work. [District Rule 1080 and Stanislaus County Rule 1080] Federally Enforceable Through Title V Permit
- 28. {2251} The owner or operator shall, upon written notice from the APCO, provide a summary of the data obtained from the CEM systems. This summary of data shall be in the form and the manner prescribed by the APCO. [District Rule 1080, 7.1] Federally Enforceable Through Title V Permit
- 29. Records shall be maintained and shall include: the occurrence and duration of any start-up, shutdown or malfunction, performance testing, evaluations, calibrations, checks, adjustments, any periods during which a continuous monitoring system or monitoring device is inoperative, maintenance of any CEMS that have been installed pursuant to District Rule 1080, and emission measurements. [District Rule 1080] Federally Enforceable Through Title V Permit
- 30. The operator shall notify the APCO no later than one hour after the detection of a breakdown of the CEMS. The operator shall inform the APCO of the intent to shut down the CEMS at least 24 hours prior to the event. [District Rule 1100] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

- 31. The permittee shall submit a written report including copies of any Equipment Breakdown reports and/or pertinent variance decisions to the APCO for each calendar quarter, within 30 days of the end of the quarter, including: time intervals, data and magnitude of excess emissions, nature and cause of excess emissions (if known), corrective actions taken and preventive measures adopted; averaging period used for data reporting shall correspond to the averaging period for each respective emission standard; applicable time and date of each period during which the CEM was inoperative (except for zero and span checks) and the nature of system repairs and adjustments; and a negative declaration when no excess emissions occurred. [District Rule 1080] Federally Enforceable Through Title V Permit
- 32. Upon notice by the District that the facility's CEM system is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the CEM data is sent to the District by a District-approved alternative method. [District Rule 1080] Federally Enforceable Through Title V Permit
- 33. Results of continuous emissions monitoring shall be reduced according to the procedure established in 40 CFR, Part 51, Appendix P, paragraphs 5.0 through 5.3.3, or by other methods deemed equivalent by mutual agreement with the District, the ARB, and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit
- 34. Cylinder gas audits (CGAs) of continuous emission monitors shall be conducted quarterly, except during quarters in which relative accuracy and total accuracy testing is performed, in accordance with EPA guidelines. The District shall be notified prior to completion of the audits. Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rule 1080] Federally Enforceable Through Title V Permit
- 35. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4201, Stanislaus County Rule 404, District Rule 4202 and Stanislaus County Rule 405. A permit shield is granted from these requirements. [District Rule 2520, §13.2] Federally Enforceable Through Title V Permit
- 36. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4801 and Stanislaus County Rule 407. A permit shield is granted from these requirements. [District Rule 2520, §13.2] Federally Enforceable Through Title V Permit
- 37. The requirements of District Rule 4301 and Stanislaus County Rule 408 were determined to not apply to this unit because the unit does not utilize indirect heat transfer. A permit shield is granted from these requirements. [District Rule 2520, §13.2] Federally Enforceable Through Title V Permit
- 38. The requirements of 40 CFR Part 61, Subpart N were determined to not apply to this unit because the unit does not use commercial arsenic. A permit shield is granted from these requirements. [District Rule 2520, §13.2] Federally Enforceable Through Title V Permit
- 39. Any glass melting furnace located at an Area Source of hazardous air pollutants shall comply with 40 CFR Part 63 Subpart SSSSSS (National Emission Standards for Hazardous Air Pollutants for Glass Manufacturing Area Sources). [40 CFR Part 63 Subpart SSSSSS] Federally Enforceable Through Title V Permit
- 40. The quantity of glass produced shall not exceed 430 tons during any one day. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 41. Except during periods of startup, shutdown, and idling, NOx emissions shall not exceed 0.99 pounds per ton of glass produced (over a rolling 30-day average). This performance based limit is to enforce the NOx emission reductions granted by certificate number N-54-2, as well as, Phase I NOx limit in Rule 4354. Any CEM measurement greater than 0.99 lb-NOx/ton of glass produced for each 30-day rolling average constitutes a violation of this emission limit. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 42. Except during periods of startup, shutdown, and idling, CO emissions shall not exceed 0.2 pounds per ton of glass produced. [District Rule 2201] Federally Enforceable Through Title V Permit
- 43. Except during periods of startup, shutdown, and idling, VOC emissions shall not exceed 0.02 pounds per ton of glass produced. [District Rule 2201] Federally Enforceable Through Title V Permit
- 44. Except during periods of startup, shutdown, and idling, the combined SOx emissions from permit units N-1662-1, N-1662-2, N-1662-3 and N-1662-4 shall not exceed 0.77 lb/ton of glass produced (over a rolling 30 day average). [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit

- 45. Except during periods of startup, shutdown, idling, and during full or partial emission control system bypass episodes, PM10 emissions shall not exceed 0.18 lb/ton of glass produced. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 46. The PM10 emissions, during full or partial emission control system bypass episodes for routine maintenance, shall not exceed 0.71 lb/ton of glass produced. [District Rule 2201] Federally Enforceable Through Title V Permit
- 47. PM emissions from the glass furnace shall not exceed 1 lb of particulate matter per ton of glass produced. [40 CFR 60.293(b)(1)] Federally Enforceable Through Title V Permit
- 48. The emission limits of this permit shall not apply during routine maintenance of the respective add-on control systems. The routine maintenance in each calendar year shall not exceed 144 hours total for all controls and routine maintenance shall be conducted in a manner consistent with good air pollution control practices for minimizing air emissions. Routine maintenance includes, but is not limited to: 1) Calibration and scheduled parts replacement of CEMS equipment per manufacturer's recommendations, 2) Cleaning of particulate control devices and stack ductwork to ensure optimal performance, and 3) Necessary repairs to ensure optimal performance of all parts of the system. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 49. The PM10 emissions shall not exceed 18,712 pounds during the first calendar quarter, 18,919 pounds during the second calendar quarter, 19,127 pounds during the third calendar quarter and 19,128 pounds during the fourth calendar quarter. These limits are to enforce the PM10 emission reductions granted by certificate number N-161-4. [District Rule 2201] Federally Enforceable Through Title V Permit
- 50. The maximum throughput of lime received and stored in the lime storage silo shared with permit units N-1662-1, N-1662-2, N-1662-3 and N-1662-4 shall not exceed either of the following limits: 65 tons-lime/day or 110 tons-lime/quarter. [District Rule 2201] Federally Enforceable Through Title V Permit
- 51. PM10 emissions rate from the lime storage silo shared with permit units N-1662-1, N-1662-2, N-1662-3 and N-1662-4 shall not exceed 0.0049 lb-PM10/ton-lime stored. [District Rule 2201] Federally Enforceable Through Title V Permit
- 52. The facility shall not use commercial arsenic as a raw material in the production process. [40 CFR Part 61 Subpart N] Federally Enforceable Through Title V Permit
- 53. Each dust collector and bin vent filter shall be maintained and operated in the range that optimizes control efficiency as recommended by the manufacturer. [District Rule 2201] Federally Enforceable Through Title V Permit
- 54. Each dust collector and bin vent filter's cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
- 55. Material removed from each dust collector and bin vent filter shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
- 56. Replacement filters numbering at least 10% of the total number of filters in the largest dust collector, and for each type of filter, shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
- 57. A spare set of bags or filters shall be maintained on the premises at all times for the bin vent filter serving the lime storage silo shared with permit units N-1662-1, N-1662-2, N-1662-3 and N-1662-4. [District Rule 2201] Federally Enforceable Through Title V Permit
- 58. Devices to measure the primary and secondary voltage and current of the electrostatic precipitator shall be maintained in accordance with the manufacturer's specifications. [District Rule 4354, 40 CFR 60.293(d) and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 59. When the electrostatic precipitator is in operation, the specific power of the electrostatic precipitator shall be at least 70 milliwatts/acfm except during the bypass episodes allowed by this permit. [District Rule 2520, §9.3.2, 40 CFR 60.293(d), and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 60. The ceramic filter dust collectors shall each be equipped with a pressure differential gauge to indicate the pressure drop across the filters. The gauges shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rules 2201 and 4354 and 10 CFR Part 64] Federally Enforceable Through Title V Permit

- 61. During operation of the ceramic filter dust collectors, the pressure differential gauge reading shall be 1 to 20 inches of water column. [District Rules 2201 and 4354 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 62. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7. [40 CFR Part 64] Federally Enforceable Through Title V Permit
- 63. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR Part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
- 64. The permittee shall comply with the record keeping and reporting requirements of 40 CFR Part 64.9. [40 CFR Part 64] Federally Enforceable Through Title V Permit
- 65. When the electrostatic precipitator is in operation, the specific power of the electrostatic precipitator shall be continuously monitored and recorded. [District Rules 2201 and 4354, 40 CFR 60.293(d), and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 66. Dust collector filters shall be inspected annually while in operation for evidence of particulate matter breakthrough and replaced as needed. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 67. Dust collector filters shall be inspected annually while not in operation for tears, scuffs, abrasions or hole that might interfere with the PM collection efficiency and shall be replaced as needed. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 68. Permittee shall keep a record of the daily hours of operation, the amount of glass pulled from the furnace (in tons), the NOx emissions (in lb/ton of glass pulled), the SOx emissions (in lb/ton of glass pulled), the weight of mixed color mix cullet used, the total amount of cullet used (by weight) and the ratio of the mixed color cullet weight to the total cullet weight (in percent). [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 69. Permittee shall maintain records of the following: 1) Source tests and source test results, 2) the acceptable range for each approved key system operating parameter, as established during source tests, 3) The operating values of the key system operating parameters at the approved recording frequency, 4) any maintenance and repair, and 5) any malfunctions. [District Rule 4354] Federally Enforceable Through Title V Permit
- 70. The pollutant mass emission rate in lb/hr shall be converted to lb pollutant/ton of glass pulled as specified in Rule 4354. The operator of a oxy-fuel fired furnace, oxygen-assisted combustion furnace, or a furnace utilizing any fuel oxidants other than 100% ambient air, shall submit to the APCO, ARB, and EPA for approval any methodologies and data that will be used to calculate emission rates for NOx, CO, and VOC if the methods are different from those specified in Rule 4354. Unless the operator received prior written approval from APCO, ARB, and EPA of all the calculation methods to be used that are different from those specified in Rule 4354, compliance with the emissions limits cannot be fully demonstrated, and it shall be deemed to be a violation of the rule. [District Rule 4354] Federally Enforceable Through Title V Permit
- 71. The oxygen to fuel ratio shall be continuously monitored and recorded. [District Rule 4354] Federally Enforceable Through Title V Permit
- 72. The permittee shall maintain daily records of the aggregated NOx emissions. [District Rules 2520, 9.3.2 and 4354] Federally Enforceable Through Title V Permit
- 73. The permittee shall maintain the burner oxygen to fuel ratio records required by this permit. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 74. A record of the PM10 emissions from this unit, in pounds per calendar quarter, shall be kept. [District Rule 2201] Federally Enforceable Through Title V Permit
- 75. A record of the cumulative annual number of hours that the emission control system is either fully or partially bypassed shall be kept. The record shall be updated at least weekly. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 76. The permittee shall keep a record of the cumulative annual hours of operation of the glass furnace on LPG fuel. [District Rule 2201] Federally Enforceable Through Title V Permit

- 77. When the electrostatic precipitator is in operation, the permittee shall maintain daily records of the specific power of the electrostatic precipitator (in milliwatts/acfm). [District Rules 2201, 4354, 40 CFR 60.293(d), and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 78. The operator shall monitor and record the pressure differential gauge reading of each ceramic filter dust collector at least once during each day that the units operate. [District Rules 2201 and 4354 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 79. Records of dust collector and bin vent filter maintenance, inspections and repairs shall be maintained. The records shall include, date of inspection, change outs of filter media, corrective action taken, and identification of the individual performing the inspection. [District Rules 2201 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 80. The permittee shall maintain records of the actual NO2, PM10, and PM emissions from this unit for each 12 consecutive-month rolling period for a period of 10 years from July 24, 2016 for the purposes of demonstrating that there has not been a PSD "significant net emissions increase" above the baseline actual NO2, PM10, and PM emission levels reported under projects N-1141107 and N-1142733. The actual net emissions increase shall be calculated in accordance with 40 CFR 52.21 (June 16, 2011 version). If a significant net emissions increase for NO2, PM10, and PM emissions occurs during any 12 consecutive month period in the 10 year recordkeeping period, the permittee shall submit a permit application to modify the permit to meet the Prevention of Significant Deterioration requirements that were avoided under projects N1141107 and N-1142733, which are the public notice and modeling requirements of 40 CFR 52.21 (June 16, 2011 version). Actual PM and PM10 emissions for the furnace may be calculated using source test results and the throughput of the glass furnace. [District Rule 2201] Federally Enforceable Through Title V Permit
- 81. Records of daily and quarterly amount of lime transferred into the lime storage silo shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
- 82. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 2201 and 4354 and 40 CFR Part 64] Federally Enforceable Through Title V Permit



AUTHORITY TO CONSTRUCT

PERMIT NO: N-1662-3-23 ISSUANCE DATE: DRAFT

LEGAL OWNER OR OPERATOR: GALLO GLASS COMPANY

MAILING ADDRESS: ATTN: ENVIRO HEALTH & SAFETY MANAGER

PO BOX 1230

MODESTO, CA 95353

LOCATION: 605 S SANTA CRUZ AVE

MODESTO, CA 95354

EQUIPMENT DESCRIPTION:

MODIFICATION OF GLASS FURNACE #3 WITH 10 PRAXAIR GEN III GAS/OXYGEN BURNERS AND ASSOCIATED FORMING EQUIPMENT (75 MMBTU/HR MAX HEAT CAPACITY) AND A 2700 KW ELECTRIC BOOST SYSTEM. THIS FURNACE IS DUCTED THROUGH A STACK COMMON TO PERMIT UNITS N-1662-1, N-1662-2, N-1662-3 AND N-1662-4. THE FURNACES ARE SERVED BY THE FOLLOWING SHARED EQUIPMENT: SOX SCRUBBER INCLUDING A LIME STORAGE SILO SERVED BY A BIN VENT FILTER, AN ELECTROSTATIC PRECIPITATOR, AND/OR FOUR TRI-MER UCF-500 CERAMIC FILTER DUST COLLECTORS: REDUCE PERMITTED NOX, SOX AND PM10 EMISSION LIMITS FOR DISTRICT RULE 4354 COMPLIANCE

CONDITIONS

- 1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
- 3. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 4. Particulate matter emissions shall not exceed 0.1 grain/dscf in concentration. [District Rule 4201 and Stanislaus County Rule 404] Federally Enforceable Through Title V Permit
- 5. The furnace shall be fired on natural gas and LPG only. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all-other governmental agencies which may pertain to the above equipment.

Samir Sheikh, Executive Director APCO

- 6. The furnace shall have continuous monitoring systems for NOx and SOx. The monitoring devices shall have continuous recording devices, and all records shall be kept on site. [District Rules 1080 and 4354] Federally Enforceable Through Title V Permit
- 7. One continuous emissions monitoring (CEM) system may be used for monitoring oxy-fuel fired furnaces #1, #2, #3, and #4 provided all of the exhaust gases of each of these furnaces are ducted to a common stack, and monitored down stream of the common stack. The CEMS shall comply with the requirements of 40 Code of Federal Regulations (CFR) Part 51, 40 CFR Parts 60.7 and 60.13, 40 CFR Part 60 Appendix B (Performance Specifications) and Appendix F (Quality Assurance Procedures) and the applicable sections of Rule 1080 (Stack Monitoring). [District Rule 4354] Federally Enforceable Through Title V Permit
- 8. The facility shall install and maintain equipment, facilities, and systems compatible with the District's CEM data polling software system and shall make CEM data available to the District's automated polling system on a daily basis. [District Rule 1080] Federally Enforceable Through Title V Permit
- 9. The common exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NOx, CO, and O2 analyzer during District inspections. The sampling ports shall be located in accordance with the CARB regulation titled California Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Source Emission Monitoring and Testing. [District Rule 1081] Federally Enforceable Through Title V Permit
- 10. The permittee shall notify the District at least 24 hours prior to initiating idling, shutdown, or startup of the glass furnace and this notification shall include: The date and time of the start of the exempt operation, reason for performing the operation, and an estimated completion date. The permittee shall notify the District within 24 hours after completion of the operation and shall maintain operating records and/or support documentation necessary to claim exemption. [District Rule 4354] Federally Enforceable Through Title V Permit
- 11. The emission control systems shall be in operation whenever conditions are consistent with equipment manufacturer's specifications during startup, idling and shutdown periods. [District Rule 4354] Federally Enforceable Through Title V Permit
- 12. The duration of a furnace shutdown shall not exceed 20 days, measured from the time furnace operations drop below the idle threshold specified in Section 3.17 of District Rule 4354 to when all emissions from the furnace cease.

 [District Rule 4354] Federally Enforceable Through Title V Permit
- 13. NOx, CO, VOC, SOx, and PM10 emissions during idling shall not exceed the amount as calculated using the following equation: NOx, CO, VOC, SOx, or PM10 (lb/day) = Applicable emission limit (lb/ton) x Furnace permitted production capacity (tons/day). [District Rule 4354] Federally Enforceable Through Title V Permit
- 14. The oxygen to fuel ratio shall be maintained within the range shown by the most recent source test to result in compliance with the CO and VOC limits of this permit. The acceptable range of the oxygen to fuel ratio shall be established during the initial source test and during each subsequent annual source test. [District Rule 4354] Federally Enforceable Through Title V Permit
- 15. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation E=3.59P^0.62 (P< 30 tph) or E=17.31P^0.16 (P> 30 tph). [District Rule 4202] Federally Enforceable Through Title V Permit
- 16. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [Stanislaus County Rule 407 and District Rule 4801] Federally Enforceable Through Title V Permit
- 17. Source testing to demonstrate compliance with permit conditions and all rules and regulations for both natural gas and LPG shall be conducted within 60 days after the end of the start-up exemption, and at least once every calendar year thereafter. NOx and CO testing shall be performed using CARB Method 100. VOC testing shall be performed using EPA methods 201 and 202, EPA methods 201a and 202, or CARB methods 501 and 5. SOx testing shall be performed using EPA Method 8 and CARB Method 1-100. [District Rules 1081, 2201, 2520, §9.3.2; and 4354] Federally Enforceable Through Title V Permit

- 18. Source testing when firing on LPG fuel need not be performed if the LPG fuel usage for this furnace does not exceed 100 hours during any one calendar year. A source test shall be performed within 90 days after this furnace exceeds 100 hours of operation, on LPG, on an annual basis. [District Rule 1081] Federally Enforceable Through Title V Permit
- 19. Source testing shall be conducted by a CARB-certified source testing contractor. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to source testing. The results of each source test shall be submitted to the District within 60 days after the source test date. [District Rule 1081] Federally Enforceable Through Title V Permit
- 20. Source test conditions shall be representative of operations equal to or greater than 60 percent of capacity for each furnace as stated in the Permit to Operate. [District Rule 4354, §6.4.2] Federally Enforceable Through Title V Permit
- 21. For source testing purposes, the arithmetic average of three 30-consecutive-minute test runs shall be used to determine compliance with NOx, CO, VOC, and SOx emission limits. [District Rule 4354] Federally Enforceable Through Title V Permit
- 22. For source testing purposes, the arithmetic average of three 60-consecutive-minute test runs shall be used to determine compliance with PM10 emission limits. [District Rule 4354] Federally Enforceable Through Title V Permit
- 23. For source testing purposes, if two of the three runs individually demonstrate emissions above the applicable limit, the test cannot be used to demonstrate compliance for the furnace, even if the averaged emissions of all three test runs is less than the applicable limit. [District Rule 4354] Federally Enforceable Through Title V Permit
- 24. PM and PM10 source testing shall be conducted downstream of the electrostatic precipitator and the ceramic filter dust collector in the common stack. Furnaces #1, #2, #3, and #4 must operate simultaneously during source testing unless prior approval is obtained from the District. [District Rule 1081] Federally Enforceable Through Title V Permit
- 25. An annual Relative Accuracy Test Audit (RATA) shall be performed on the continuous monitoring system as outlined in 40 CFR Part 60 Appendix B. [District Rule 1080] Federally Enforceable Through Title V Permit
- 26. The owner/operator shall perform a relative accuracy test audit (RATA) as specified by 40 CFR Part 60, Appendix F (CGAs and RATAs) and if applicable 40 CFR Part 75, Appendix B (linearity and RATAs) at least once every four calendar quarters and annually within 30 days of the anniversary date of the initial test. The permittee shall comply with the applicable requirements for quality assurance testing and maintenance of the continuous emission monitor equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F. [District Rule 1080] Federally Enforceable Through Title V Permit
- 27. An exceedance of a NOx or SOx emission limit as indicated by the CEMS shall be reported by the operator to the APCO within 24 hours. The notification shall include 1) name and location of the facility, 2) identification of furnace(s) causing the exceedances, 3) calculation of actual NOx, CO and VOC emissions, and 4) corrective actions and schedules to complete the work. [District Rule 1080 and Stanislaus County Rule 1080] Federally Enforceable Through Title V Permit
- 28. {2251} The owner or operator shall, upon written notice from the APCO, provide a summary of the data obtained from the CEM systems. This summary of data shall be in the form and the manner prescribed by the APCO. [District Rule 1080, 7.1] Federally Enforceable Through Title V Permit
- 29. Records shall be maintained and shall include: the occurrence and duration of any start-up, shutdown or malfunction, performance testing, evaluations, calibrations, checks, adjustments, any periods during which a continuous monitoring system or monitoring device is inoperative, maintenance of any CEMS that have been installed pursuant to District Rule 1080, and emission measurements. [District Rule 1080] Federally Enforceable Through Title V Permit
- 30. The operator shall notify the APCO no later than one hour after the detection of a breakdown of the CEMS. The operator shall inform the APCO of the intent to shut down the CEMS at least 24 hours prior to the event. [District Rule 1100] Federally Enforceable Through Title V Permit

- 31. The permittee shall submit a written report including copies of any Equipment Breakdown reports and/or pertinent variance decisions to the APCO for each calendar quarter, within 30 days of the end of the quarter, including: time intervals, data and magnitude of excess emissions, nature and cause of excess emissions (if known), corrective actions taken and preventive measures adopted; averaging period used for data reporting shall correspond to the averaging period for each respective emission standard; applicable time and date of each period during which the CEM was inoperative (except for zero and span checks) and the nature of system repairs and adjustments; and a negative declaration when no excess emissions occurred. [District Rule 1080] Federally Enforceable Through Title V Permit
- 32. Upon notice by the District that the facility's CEM system is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the CEM data is sent to the District by a District-approved alternative method. [District Rule 1080] Federally Enforceable Through Title V Permit
- 33. Results of continuous emissions monitoring shall be reduced according to the procedure established in 40 CFR, Part 51, Appendix P, paragraphs 5.0 through 5.3.3, or by other methods deemed equivalent by mutual agreement with the District, the ARB, and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit
- 34. Cylinder gas audits (CGAs) of continuous emission monitors shall be conducted quarterly, except during quarters in which relative accuracy and total accuracy testing is performed, in accordance with EPA guidelines. The District shall be notified prior to completion of the audits. Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rule 1080] Federally Enforceable Through Title V Permit
- 35. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4201, Stanislaus County Rule 404, District Rule 4202 and Stanislaus County Rule 405. A permit shield is granted from these requirements. [District Rule 2520, §13.2] Federally Enforceable Through Title V Permit
- 36. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4801 and Stanislaus County Rule 407. A permit shield is granted from these requirements. [District Rule 2520, §13.2] Federally Enforceable Through Title V Permit
- 37. The requirements of District Rule 4301 and Stanislaus County Rule 408 were determined to not apply to this unit because the unit does not utilize indirect heat transfer. A permit shield is granted from these requirements. [District Rule 2520, §13.2] Federally Enforceable Through Title V Permit
- 38. The requirements of 40 CFR Part 61, Subpart N were determined to not apply to this unit because the unit does not use commercial arsenic. A permit shield is granted from these requirements. [District Rule 2520, §13.2] Federally Enforceable Through Title V Permit
- 39. Any glass melting furnace located at an Area Source of hazardous air pollutants shall comply with 40 CFR Part 63 Subpart SSSSSS (National Emission Standards for Hazardous Air Pollutants for Glass Manufacturing Area Sources). [40 CFR Part 63 Subpart SSSSSS] Federally Enforceable Through Title V Permit
- 40. The quantity of glass produced shall not exceed 430 tons during any one day. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 41. Except during periods of startup, shutdown, and idling, NOx emissions shall not exceed 0.99 pounds per ton of glass produced (over a rolling 30-day average). This performance based limit is to enforce the NOx emission reductions granted by certificate number N-56-2, as well as, Phase I NOx limit in Rule 4354. Any CEM measurement greater than 0.99 lb-NOx/ton of glass produced for each 30-day rolling average constitutes a violation of this emission limit. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 42. Except during periods of startup, shutdown, and idling, CO emissions shall not exceed 0.01 pounds per ton of glass produced. This performance based limit is to enforce the CO emission reductions granted by certificate number N-56-3. [District Rule 2201] Federally Enforceable Through Title V Permit
- 43. Except during periods of startup, shutdown, and idling, VOC emissions shall not exceed 0.02 pounds per ton of glass produced. [District Rule 2201] Federally Enforceable Through Title V Permit
- 44. Except during periods of startup, shutdown, and idling, the combined SOx emissions from permit units N-1662-1, N-1662-2, N-1662-3 and N-1662-4 shall not exceed 0.77 lb/ton of glass produced (over a rolling 30 day average. [District Rules 2201 and 4354] Federally Enforceable Through Type V Permit

- 45. Except during periods of startup, shutdown, idling, and during full or partial emission control system bypass episodes, PM10 emissions shall not exceed 0.18 lb/ton of glass produced. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 46. The PM10 emissions, during full or partial emission control system bypass episodes for routine maintenance, shall not exceed 0.71 lb/ton of glass produced. [District Rule 2201] Federally Enforceable Through Title V Permit
- 47. PM emissions from the glass furnace shall not exceed 1 lb of particulate matter per ton of glass produced. [40 CFR 60.293(b)(1)] Federally Enforceable Through Title V Permit
- 48. The emission limits of this permit shall not apply during routine maintenance of the respective add-on control systems. The routine maintenance in each calendar year shall not exceed 144 hours total for all controls and routine maintenance shall be conducted in a manner consistent with good air pollution control practices for minimizing air emissions. Routine maintenance includes, but is not limited to: 1) Calibration and scheduled parts replacement of CEMS equipment per manufacturer's recommendations, 2) Cleaning of particulate control devices and stack ductwork to ensure optimal performance, and 3) Necessary repairs to ensure optimal performance of all parts of the system. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 49. The PM10 emissions shall not exceed 19,006 pounds during the first calendar quarter, 19,178 pounds during the second calendar quarter, 19,351 pounds during the third calendar quarter and 19,351 pounds during the fourth calendar quarter. These limits are to enforce the PM10 emission reductions granted by certificate number N-161-4. [District Rule 2201] Federally Enforceable Through Title V Permit
- 50. The maximum throughput of lime received and stored in the lime storage silo shared with permit units N-1662-1, N-1662-2, N-1662-3 and N-1662-4 shall not exceed either of the following limits: 65 tons-lime/day or 110 tons-lime/quarter. [District Rule 2201] Federally Enforceable Through Title V Permit
- 51. PM10 emissions rate from the lime storage silo shared with permit units N-1662-1, N-1662-2, N-1662-3 and N-1662-4 shall not exceed 0.0049 lb-PM10/ton-lime stored. [District Rule 2201] Federally Enforceable Through Title V Permit
- 52. The facility shall not use commercial arsenic as a raw material in the production process. [40 CFR Part 61 Subpart N] Federally Enforceable Through Title V Permit
- 53. Each dust collector and bin vent filter shall be maintained and operated in the range that optimizes control efficiency as recommended by the manufacturer. [District Rule 2201] Federally Enforceable Through Title V Permit
- 54. Each dust collector and bin vent filter's cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
- 55. Material removed from each dust collector and bin vent filter shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
- 56. Replacement filters numbering at least 10% of the total number of filters in the largest dust collector, and for each type of filter, shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
- 57. A spare set of bags or filters shall be maintained on the premises at all times for the bin vent filter serving the lime storage silo shared with permit units N-1662-1, N-1662-2, N-1662-3 and N-1662-4. [District Rule 2201] Federally Enforceable Through Title V Permit
- 58. Devices to measure the primary and secondary voltage and current of the electrostatic precipitator shall be maintained in accordance with the manufacturer's specifications. [District Rule 4354, 40 CFR 60.293(d), and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 59. When the electrostatic precipitator is in operation, the specific power of the electrostatic precipitator shall be at least 70 milliwatts/acfm except during the bypass episodes allowed by this permit. [District Rule 2520, §9.3.2, 40 CFR 60.293(d), and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 60. The ceramic filter dust collectors shall each be equipped with a pressure differential gauge to indicate the pressure drop across the filters. The gauges shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rules 2201 and 4354 and 10 CFR Part 64] Federally Enforceable Through Title V Permit

- 61. During operation of the ceramic filter dust collectors, the pressure differential gauge reading shall be 1 to 20 inches of water column. [District Rules 2201 and 4354 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 62. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7. [40 CFR Part 64] Federally Enforceable Through Title V Permit
- 63. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR Part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
- 64. The permittee shall comply with the record keeping and reporting requirements of 40 CFR Part 64.9. [40 CFR Part 64] Federally Enforceable Through Title V Permit
- 65. When the electrostatic precipitator is in operation, the specific power of the electrostatic precipitator shall be continuously monitored and recorded. [District Rules 2201 and 4354, 40 CFR 60.293(d), and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 66. Dust collector filters shall be inspected annually while in operation for evidence of particulate matter breakthrough and replaced as needed. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 67. Dust collector filters shall be inspected annually while not in operation for tears, scuffs, abrasions or hole that might interfere with the PM collection efficiency and shall be replaced as needed. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 68. Permittee shall keep a record of the daily hours of operation, the amount of glass pulled from the furnace (in tons), the NOx emissions (in lb/ton of glass pulled), the SOx emissions (in lb/ton of glass pulled), the weight of mixed color mix cullet used, the total amount of cullet used (by weight) and the ratio of the mixed color cullet weight to the total cullet weight (in percent). [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 69. Permittee shall maintain records of the following: 1) Source tests and source test results, 2) the acceptable range for each approved key system operating parameter, as established during source tests, 3) The operating values of the key system operating parameters at the approved recording frequency, 4) any maintenance and repair, and 5) any malfunctions. [District Rule 4354] Federally Enforceable Through Title V Permit
- 70. The pollutant mass emission rate in lb/hr shall be converted to lb pollutant/ton of glass pulled as specified in Rule 4354. The operator of a oxy-fuel fired furnace, oxygen-assisted combustion furnace, or a furnace utilizing any fuel oxidants other than 100% ambient air, shall submit to the APCO, ARB, and EPA for approval any methodologies and data that will be used to calculate emission rates for NOx, CO, and VOC if the methods are different from those specified in Rule 4354. Unless the operator received prior written approval from APCO, ARB, and EPA of all the calculation methods to be used that are different from those specified in Rule 4354, compliance with the emissions limits cannot be fully demonstrated, and it shall be deemed to be a violation of the rule. [District Rule 4354] Federally Enforceable Through Title V Permit
- 71. The oxygen to fuel ratio shall be continuously monitored and recorded. [District Rule 4354] Federally Enforceable Through Title V Permit
- 72. The permittee shall maintain daily records of the aggregated NOx emissions. [District Rules 2520, 9.3.2 and 4354] Federally Enforceable Through Title V Permit
- 73. The permittee shall maintain the burner oxygen to fuel ratio records required by this permit. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 74. A record of the PM10 emissions from this unit, in pounds per calendar quarter, shall be kept. [District Rule 2201] Federally Enforceable Through Title V Permit
- 75. A record of the cumulative annual number of hours that the emission control system is either fully or partially bypassed shall be kept. The record shall be updated at least weekly. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 76. The permittee shall keep a record of the cumulative annual hours of operation of the glass furnace on LPG fuel. [District Rule 2201] Federally Enforceable Through Title V Permit

- 77. When the electrostatic precipitator is in operation, the permittee shall maintain daily records of the specific power of the electrostatic precipitator (in milliwatts/acfm). [District Rules 2201, 4354, 40 CFR 60.293(d) and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 78. The operator shall monitor and record the pressure differential gauge reading of each ceramic filter dust collector at least once during each day that the units operate. [District Rules 2201 and 4354 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 79. Records of dust collector and bin vent filter maintenance, inspections and repairs shall be maintained. The records shall include, date of inspection, change outs of filter media, corrective action taken, and identification of the individual performing the inspection. [District Rules 2201 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 80. Records of daily and quarterly amount of lime transferred into the lime storage silo shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
- 81. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 2201 and 4354 and 40 CFR Part 64] Federally Enforceable Through Title V Permit



AUTHORITY TO CONSTRUCT

PERMIT NO: N-1662-4-25 ISSUANCE DATE:\DRAF

LEGAL OWNER OR OPERATOR: GALLO GLASS COMPANY

MAILING ADDRESS: ATTN: ENVIRO HEALTH & SAFETY MANAGER

PO BOX 1230

MODESTO, CA 95353

LOCATION: 605 S SANTA CRUZ AVE

MODESTO, CA 95354

EQUIPMENT DESCRIPTION:

MODIFICATION OF GLASS FURNACE #4 WITH 10 PRAXAIR GAS/OXYGEN BURNERS AND ASSOCIATED FORMING EQUIPMENT (90 MMBTU/HR MAX HEAT CAPACITY). THIS FURNACE IS DUCTED THROUGH A STACK COMMON TO PERMIT UNITS N-1662-1, N-1662-2, N-1662-3 AND N-1662-4. THE FURNACES ARE SERVED BY THE FOLLOWING SHARED EQUIPMENT: SOX SCRUBBER INCLUDING A LIME STORAGE SILO SERVED BY A BIN VENT FILTER, AN ELECTROSTATIC PRECIPITATOR, AND/OR FOUR TRI-MER UCF-500 CERAMIC FILTER DUST COLLECTORS: REDUCE PERMITTED NOX. SOX AND PM10 EMISSION LIMITS FOR DISTRICT RULE 4354 COMPLIANCE

CONDITIONS

- 1. {1830} This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. {1831} Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
- 3. {98} No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- 4. Particulate matter emissions shall not exceed 0.1 grain/dscf in concentration. [District Rule 4201 and Stanislaus County Rule 404] Federally Enforceable Through Title V Permit
- 5. The furnace shall be fired on natural gas and LPG only. [District Rule 2201] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all-other governmental agencies which may pertain to the above equipment.

Samir Sheikh, Executive Director APCO

- 6. The furnace shall have continuous monitoring systems for NOx and SOx. The monitoring devices shall have continuous recording devices, and all records shall be kept on site. [District Rules 1080 and 4354] Federally Enforceable Through Title V Permit
- 7. One continuous emissions monitoring (CEM) system may be used for monitoring oxy-fuel fired furnaces #1, #2, #3, and #4 provided all of the exhaust gases of each of these furnaces are ducted to a common stack, and monitored down stream of the common stack. The CEMS shall comply with the requirements of 40 Code of Federal Regulations (CFR) Part 51, 40 CFR Parts 60.7 and 60.13, 40 CFR Part 60 Appendix B (Performance Specifications) and Appendix F (Quality Assurance Procedures) and the applicable sections of Rule 1080 (Stack Monitoring). [District Rule 4354] Federally Enforceable Through Title V Permit
- 8. The facility shall install and maintain equipment, facilities, and systems compatible with the District's CEM data polling software system and shall make CEM data available to the District's automated polling system on a daily basis. [District Rule 1080] Federally Enforceable Through Title V Permit
- 9. The common exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NOx, CO, and O2 analyzer during District inspections. The sampling ports shall be located in accordance with the CARB regulation titled California Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Source Emission Monitoring and Testing. [District Rule 1081] Federally Enforceable Through Title V Permit
- 10. The permittee shall notify the District at least 24 hours prior to initiating idling, shutdown, or startup of the glass furnace and this notification shall include: The date and time of the start of the exempt operation, reason for performing the operation, and an estimated completion date. The permittee shall notify the District within 24 hours after completion of the operation and shall maintain operating records and/or support documentation necessary to claim exemption. [District Rule 4354] Federally Enforceable Through Title V Permit
- 11. The emission control systems shall be in operation whenever conditions are consistent with equipment manufacturer's specifications during startup, idling and shutdown periods. [District Rule 4354] Federally Enforceable Through Title V Permit
- 12. The duration of a furnace shutdown shall not exceed 20 days, measured from the time furnace operations drop below the idle threshold specified in Section 3.17 of District Rule 4354 to when all emissions from the furnace cease.

 [District Rule 4354] Federally Enforceable Through Title V Permit
- 13. The oxygen to fuel ratio shall be maintained within the range shown by the most recent source test to result in compliance with the CO and VOC limits of this permit. The acceptable range of the oxygen to fuel ratio shall be established during the initial source test and during each subsequent annual source test. [District Rule 4354] Federally Enforceable Through Title V Permit
- 14. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation E=3.59P^0.62 (P< 30 tph) or E=17.31P^0.16 (P> 30 tph). [District Rule 4202] Federally Enforceable Through Title V Permit
- 15. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [Stanislaus County Rule 407 and District Rule 4801] Federally Enforceable Through Title V Permit
- 16. Source testing to demonstrate compliance with permit conditions and all rules and regulations for both natural gas and LPG shall be conducted within 60 days after the end of the start-up exemption, and at least once every calendar year thereafter. NOx and CO testing shall be performed using CARB Method 100. VOC testing shall be performed using EPA methods 201 and 202, EPA methods 201a and 202, or CARB methods 501 and 5. SOx testing shall be performed using EPA Method 8 and CARB Method 1-100. [District Rules 1081; 2520; and 4354] Federally Enforceable Through Title V Permit
- 17. Source testing when firing on LPG fuel need not be performed if the LPG fuel usage for this furnace does not exceed 100 hours during any one calendar year. A source test shall be performed within 90 days after this furnace exceeds 100 hours of operation, on LPG, on an annual basis. [District Rule 1081] Federally Enforceable Through Title V Permit

- 18. Source testing shall be conducted by a CARB-certified source testing contractor. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to source testing. The results of each source test shall be submitted to the District within 60 days after the source test date. [District Rule 1081] Federally Enforceable Through Title V Permit
- 19. Source test conditions shall be representative of operations equal to or greater than 60 percent of capacity for each furnace as stated in the Permit to Operate. [District Rule 4354] Federally Enforceable Through Title V Permit
- 20. For source testing purposes, the arithmetic average of three 30-consecutive-minute test runs shall be used to determine compliance with NOx, CO, VOC, and SOx emission limits. [District Rule 4354] Federally Enforceable Through Title V Permit
- 21. For source testing purposes, the arithmetic average of three 60-consecutive-minute test runs shall be used to determine compliance with PM10 emission limits. [District Rule 4354] Federally Enforceable Through Title V Permit
- 22. For source testing purposes, if two of the three runs individually demonstrate emissions above the applicable limit, the test cannot be used to demonstrate compliance for the furnace, even if the averaged emissions of all three test runs is less than the applicable limit. [District Rule 4354] Federally Enforceable Through Title V Permit
- 23. PM and PM10 source testing shall be conducted downstream of the electrostatic precipitator and the ceramic filter dust collector in the common stack. Furnaces #1, #2, #3, and #4 must operate simultaneously during source testing unless prior approval is obtained from the District. [District Rule 1081] Federally Enforceable Through Title V Permit
- 24. An annual Relative Accuracy Test Audit (RATA) shall be performed on the continuous monitoring system as outlined in 40 CFR Part 60 Appendix B. [District Rule 1080] Federally Enforceable Through Title V Permit
- 25. The owner/operator shall perform a relative accuracy test audit (RATA) as specified by 40 CFR Part 60, Appendix F (CGAs and RATAs) and if applicable 40 CFR Part 75, Appendix B (linearity and RATAs) at least once every four calendar quarters and annually within 30 days of the anniversary date of the initial test. The permittee shall comply with the applicable requirements for quality assurance testing and maintenance of the continuous emission monitor equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F. [District Rule 1080] Federally Enforceable Through Title V Permit
- 26. An exceedance of a NOx or SOx emission limit as indicated by the CEMS shall be reported by the operator to the APCO within 24 hours. The notification shall include 1) name and location of the facility, 2) identification of furnace(s) causing the exceedances, 3) calculation of actual NOx, CO and VOC emissions, and 4) corrective actions and schedules to complete the work. [District Rule 1080 and Stanislaus County Rule 108] Federally Enforceable Through Title V Permit
- 27. {2251} The owner or operator shall, upon written notice from the APCO, provide a summary of the data obtained from the CEM systems. This summary of data shall be in the form and the manner prescribed by the APCO. [District Rule 1080, 7.1] Federally Enforceable Through Title V Permit
- 28. Records shall be maintained and shall include: the occurrence and duration of any start-up, shutdown or malfunction, performance testing, evaluations, calibrations, checks, adjustments, any periods during which a continuous monitoring system or monitoring device is inoperative, maintenance of any CEMS that have been installed pursuant to District Rule 1080, and emission measurements. [District Rule 1080] Federally Enforceable Through Title V Permit
- 29. The operator shall notify the APCO no later than one hour after the detection of a breakdown of the CEMS. The operator shall inform the APCO of the intent to shut down the CEMS at least 24 hours prior to the event. [District Rule 1100] Federally Enforceable Through Title V Permit
- 30. The permittee shall submit a written report including copies of any Equipment Breakdown reports and/or pertinent variance decisions to the APCO for each calendar quarter, within 30 days of the end of the quarter, including: time intervals, data and magnitude of excess emissions, nature and cause of excess emissions (if known), corrective actions taken and preventive measures adopted; averaging period used for data reporting shall correspond to the averaging period for each respective emission standard; applicable time and date of each period during which the CEM was inoperative (except for zero and span checks) and the nature of system repairs and adjustments; and a negative declaration when no excess emissions occurred. District Rule 1080] Federally Enforceable Through Title V Permit

- 31. Upon notice by the District that the facility's CEM system is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the CEM data is sent to the District by a District-approved alternative method. [District Rule 1080] Federally Enforceable Through Title V Permit
- 32. Results of continuous emissions monitoring shall be reduced according to the procedure established in 40 CFR, Part 51, Appendix P, paragraphs 5.0 through 5.3.3, or by other methods deemed equivalent by mutual agreement with the District, the ARB, and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit
- 33. Cylinder gas audits (CGAs) of continuous emission monitors shall be conducted quarterly, except during quarters in which relative accuracy and total accuracy testing is performed, in accordance with EPA guidelines. The District shall be notified prior to completion of the audits. Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rule 1080] Federally Enforceable Through Title V Permit
- 34. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4201, Stanislaus County Rule 404, District Rule 4202 and Stanislaus County Rule 405. A permit shield is granted from these requirements. [District Rule 2520] Federally Enforceable Through Title V Permit
- 35. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4801 and Stanislaus County Rule 407. A permit shield is granted from these requirements. [District Rule 2520] Federally Enforceable Through Title V Permit
- 36. The requirements of District Rule 4301 and Stanislaus County Rule 408 were determined to not apply to this unit because the unit does not utilize indirect heat transfer. A permit shield is granted from these requirements. [District Rule 2520] Federally Enforceable Through Title V Permit
- 37. The requirements of 40 CFR Part 61, Subpart N were determined to not apply to this unit because the unit does not use commercial arsenic. A permit shield is granted from these requirements. [District Rule 2520] Federally Enforceable Through Title V Permit
- 38. Any glass melting furnace located at an Area Source of hazardous air pollutants shall comply with 40 CFR Part 63 Subpart SSSSSS (National Emission Standards for Hazardous Air Pollutants for Glass Manufacturing Area Sources). [40 CFR Part 63 Subpart SSSSSS] Federally Enforceable Through Title V Permit
- 39. The amount of glass produced shall not exceed 637.9 tons during any one day. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 40. Except during periods of startup, shutdown, and idling, NOx emissions shall not exceed 0.99 pounds per ton of glass produced (over a rolling 30-day average). This performance based limit is to enforce the NOx emission reductions granted by certificate number N-107-2, as well as, Phase I NOx limit in Rule 4354. Any CEM measurement greater than 0.99 lb-NOx/ton of glass produced for each 30-day rolling average constitutes a violation of this emission limit. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 41. Except during periods of startup, shutdown, and idling, CO emissions shall not exceed 0.20 pounds per ton of glass produced. [District Rule 2201] Federally Enforceable Through Title V Permit
- 42. Except during periods of startup, shutdown, and idling, VOC emissions shall not exceed 0.02 pounds per ton of glass produced. [District Rule 2201] Federally Enforceable Through Title V Permit
- 43. Except during periods of startup, shutdown, and idling, the combined SOx emissions from permit units N-1662-1, N-1662-2, N-1662-3 and N-1662-4 shall not exceed 0.77 lb/ton of glass produced (over a rolling 30 day average). [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 44. Except during periods of startup, shutdown, idling, and during full or partial emission control system bypass episodes, PM10 emissions shall not exceed 0.18 lb/ton of glass produced. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 45. The PM10 emissions, during full or partial emission control system bypass episodes for routine maintenance, shall not exceed 0.71 lb/ton of glass produced. [District Rule 2201] Federally Enforceable Through Title V Permit
- 46. PM emissions from the glass furnace shall not exceed 1 b of particulate matter per ton of glass produced. [40 CFR 60.293(b)(1)] Federally Enforceable Through Title V Permit

- 47. The emission limits of this permit shall not apply during routine maintenance of the respective add-on control systems. The routine maintenance in each calendar year shall not exceed 144 hours total for all controls and routine maintenance shall be conducted in a manner consistent with good air pollution control practices for minimizing air emissions. Routine maintenance includes, but is not limited to: 1) Calibration and scheduled parts replacement of CEMS equipment per manufacturer's recommendations, 2) Cleaning of particulate control devices and stack ductwork to ensure optimal performance, and 3) Necessary repairs to ensure optimal performance of all parts of the system. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 48. The facility shall not use commercial arsenic as a raw material in the production process. [40 CFR Part 61 Subpart N] Federally Enforceable Through Title V Permit
- 49. The PM10 emissions shall not exceed 28,132 pounds during the first calendar quarter, 28,445 pounds during the second calendar quarter, 28,757 pounds during the third calendar quarter and 28,758 pounds during the fourth calendar quarter. These limits are to enforce the PM10 emission reductions granted by certificate number N-161-4. [District Rule 2201] Federally Enforceable Through Title V Permit
- 50. The maximum throughput of lime received and stored in the lime storage silo shared with permit units N-1662-1, N-1662-2, N-1662-3 and N-1662-4 shall not exceed either of the following limits: 65 tons-lime/day or 110 tons-lime/quarter. [District Rule 2201] Federally Enforceable Through Title V Permit
- 51. PM10 emissions rate from the lime storage silo shared with permit units N-1662-1, N-1662-2, N-1662-3 and N-1662-4 shall not exceed 0.0049 lb-PM10/ton-lime stored. [District Rule 2201] Federally Enforceable Through Title V Permit
- 52. Each dust collector and bin vent filter shall be maintained and operated in the range that optimizes control efficiency as recommended by the manufacturer. [District Rule 2201] Federally Enforceable Through Title V Permit
- 53. Each dust collector and bin vent filter's cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
- 54. Material removed from each dust collector and bin vent filter shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
- 55. Replacement filters numbering at least 10% of the total number of filters in the largest dust collector, and for each type of filter, shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
- 56. A spare set of bags or filters shall be maintained on the premises at all times for the bin vent filter serving the lime storage silo shared with permit units N-1662-1, N-1662-2, N-1662-3 and N-1662-4. [District Rule 2201] Federally Enforceable Through Title V Permit
- 57. Devices to measure the primary and secondary voltage and current of the electrostatic precipitator shall be maintained in accordance with the manufacturer's specifications. [District Rule 4354, 40 CFR 60.293(d), and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 58. When the electrostatic precipitator is in operation, the specific power of the electrostatic precipitator shall be at least 70 milliwatts/acfm except during the bypass episodes allowed by this permit. [District Rule 2520, §9.3.2, 40 CFR 60.293(d), and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 59. The ceramic filter dust collectors shall each be equipped with a pressure differential gauge to indicate the pressure drop across the filters. The gauges shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rules 2201 and 4354 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 60. During operation of the ceramic filter dust collectors, the pressure differential gauge reading shall be 1 to 20 inches of water column. [District Rules 2201 and 4354 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 61. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7. [40 CFR Part 64] Federally Enforceable Through Title V Permit
- 62. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR Part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit

- 63. The permittee shall comply with the record keeping and reporting requirements of 40 CFR Part 64.9. [40 CFR Part 64] Federally Enforceable Through Title V Permit
- 64. When the electrostatic precipitator is in operation, the specific power of the electrostatic precipitator shall be continuously monitored and recorded. [District Rules 2201 and 4354, 40 CFR 60.293(d), and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 65. Dust collector filters shall be inspected annually while in operation for evidence of particulate matter breakthrough and replaced as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
- 66. Dust collector filters shall be inspected annually while not in operation for tears, scuffs, abrasions or hole that might interfere with the PM collection efficiency and shall be replaced as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
- 67. Permittee shall keep a record of the daily hours of operation, the amount of glass pulled from the furnace (in tons), the NOx emissions (in lb/ton of glass pulled), the SOx emissions (in lb/ton of glass pulled), the weight of mixed color mix cullet used, the total amount of cullet used (by weight) and the ratio of the mixed color cullet weight to the total cullet weight (in percent). [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 68. Permittee shall maintain records of the following: 1) Source tests and source test results, 2) the acceptable range for each approved key system operating parameter, as established during source tests, 3) The operating values of the key system operating parameters at the approved recording frequency, 4) any maintenance and repair, and 5) any malfunctions. [District Rule 4354] Federally Enforceable Through Title V Permit
- 69. The pollutant mass emission rate in lb/hr shall be converted to lb pollutant/ton of glass pulled as specified in Rule 4354. The operator of a oxy-fuel fired furnace, oxygen-assisted combustion furnace, or a furnace utilizing any fuel oxidants other than 100% ambient air, shall submit to the APCO, ARB, and EPA for approval any methodologies and data that will be used to calculate emission rates for NOx, CO, and VOC if the methods are different from those specified in Rule 4354. Unless the operator received prior written approval from APCO, ARB, and EPA of all the calculation methods to be used that are different from those specified in Rule 4354, compliance with the emissions limits cannot be fully demonstrated, and it shall be deemed to be a violation of the rule. [District Rule 4354] Federally Enforceable Through Title V Permit
- 70. The oxygen to fuel ratio shall be continuously monitored and recorded. [District Rule 4354] Federally Enforceable Through Title V Permit
- 71. The permittee shall maintain daily records of the aggregated NOx emissions. [District Rules 2520 and 4354] Federally Enforceable Through Title V Permit
- 72. The permittee shall maintain the burner oxygen to fuel ratio records required by this permit. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 73. A record of the PM10 emissions from this unit, in pounds per calendar quarter, shall be kept. [District Rule 2201] Federally Enforceable Through Title V Permit
- 74. A record of the cumulative annual number of hours that the emission control system is either fully or partially bypassed shall be kept. The record shall be updated at least weekly. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 75. The permittee shall keep a record of the cumulative annual hours of operation of the glass furnace on LPG fuel. [District Rule 1070] Federally Enforceable Through Title V Permit
- 76. When the electrostatic precipitator is in operation, the permittee shall maintain daily records of the specific power of the electrostatic precipitator (in milliwatts/acfm). [District Rules 2201, 4354, 40 CFR 60.293(d) and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 77. The operator shall monitor and record the pressure differential gauge reading of each ceramic filter dust collector at least once during each day that the units operate. [District Rules 2201 and 4354 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 78. Records of dust collector and bin vent filter maintenance, inspections and repairs shall be maintained. The records shall include, date of inspection, change outs of lifter media, corrective action taken, and identification of the individual performing the inspection. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit

- 79. Records of daily and quarterly amount of lime transferred into the lime storage silo shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
- 80. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 2201 and 4354 and 40 CFR Part 64] Federally Enforceable Through Title V Permit



APPENDIX B Current PTOs

PERMIT UNIT: N-1662-1-19 EXPIRATION DATE: 06/30/2026

EQUIPMENT DESCRIPTION:

GLASS FURNACE #1 WITH 10 MAXON GAS/OXYGEN BURNERS (75 MMBTU/HR MAX HEAT CAPACITY), AND ASSOCIATED FORMING EQUIPMENT INCLUDING FOREHEARTHS, COATING, AND CHAIN BURNERS. THIS FURNACE IS DUCTED THROUGH A STACK COMMON TO PERMIT UNITS N-1662-1. N-1662-2. N-1662-3 AND N-1662-4. THE FURNACES ARE SERVED BY THE FOLLOWING SHARED EQUIPMENT: SOX SCRUBBER INCLUDING A LIME STORAGE SILO SERVED BY A BIN VENT FILTER, AN ELECTROSTATIC PRECIPITATOR, AND/OR FOUR TRI-MER UCF-500 CERAMIC FILTER DUST COLLECTORS

PERMIT UNIT REQUIREMENTS

- No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102] 1.
- 2. Particulate matter emissions shall not exceed 0.1 grain/dscf in concentration. [District Rule 4201 and Stanislaus County Rule 404] Federally Enforceable Through Title V Permit
- The furnace shall be fired on natural gas and LPG only. [District Rule 2201] Federally Enforceable Through Title V
- The furnace shall have continuous monitoring systems for NOx and SOx. The monitoring devices shall have continuous recording devices, and all records shall be kept on site. [District Rules 1080 and 4354, §5.9] Federally Enforceable Through Title V Permit
- One continuous emissions monitoring (CEM) system may be used for monitoring oxy-fuel fired furnaces #1, #2, #3, and #4 provided all of the exhaust gases of each of these furnaces are ducted to a common stack, and monitored down stream of the common stack. The CEMS shall comply with the requirements of 40 Code of Federal Regulations (CFR) Part 51, 40 CFR Parts 60.7 and 60.13, 40 CFR Part 60 Appendix B (Performance Specifications) and Appendix F (Quality Assurance Procedures) and the applicable sections of Rule 1080 (Stack Monitoring). [District Rule 4354, 5.9 and 6.6.1] Federally Enforceable Through Title V Permit
- The facility shall install and maintain equipment, facilities, and systems compatible with the District's CEM data polling software system and shall make CEM data available to the District's automated polling system on a daily basis. [District Rule 1080] Federally Enforceable Through Title V Permit
- The common exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NOx, CO, and O2 analyzer during District inspections. The sampling ports shall be located in accordance with the CARB regulation titled California Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Source Emission Monitoring and Testing. [District Rule 1081] Federally Enforceable Through Title V Permit
- The permittee shall notify the District at least 24 hours prior to initiating idling, shutdown, or startup of the glass furnace and this notification shall include: The date and time of the start of the exempt operation, reason for performing the operation, and an estimated completion date. The permittee shall notify the District within 24 hours after completion of the operation and shall maintain operating records and/or support documentation necessary to claim exemption. [District Rule 4354] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: GALLO GLASS COMPANY

605 S SANTA CRUZ AVE, MODESTO, CA 95354 Location: N-1662-1-19 : Jan 23 2023 4:34PM -- KAHLONJ

- 9. The emission control systems shall be in operation whenever conditions are consistent with equipment manufacturer's specifications during startup, idling and shutdown periods. [District Rule 4354] Federally Enforceable Through Title V Permit
- 10. The duration of a furnace shutdown shall not exceed 20 days, measured from the time furnace operations drop below the idle threshold specified in Section 3.17 of District Rule 4354 to when all emissions from the furnace cease. [District Rule 4354] Federally Enforceable Through Title V Permit
- 11. NOx, CO, VOC, SOx, and PM10 emissions during idling shall not exceed the amount as calculated using the following equation: NOx, CO, VOC, SOx, or PM10 (lb/day) = Applicable emission limit (lb/ton) x Furnace permitted production capacity (tons/day). [District Rule 4354] Federally Enforceable Through Title V Permit
- 12. The oxygen to fuel ratio shall be maintained within the range shown by the most recent source test to result in compliance with the CO and VOC limits of this permit. The acceptable range of the oxygen to fuel ratio shall be established during the initial source test and during each subsequent annual source test. [District Rule 4354] Federally Enforceable Through Title V Permit
- 13. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation E=3.59P^0.62 (P< 30 tph) or E=17.31P^0.16 (P> 30 tph). [District Rule 4202] Federally Enforceable Through Title V Permit
- 14. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [Stanislaus County Rule 407 and District Rule 4801] Federally Enforceable Through Title V Permit
- 15. Source testing to demonstrate compliance with permit conditions and all rules and regulations for both natural gas and LPG shall be conducted within 60 days after the end of the start-up exemption, and at least once every calendar year thereafter. NOx and CO testing shall be performed using CARB Method 100. VOC testing shall be performed using EPA methods 201 and 202, EPA methods 201a and 202, or CARB methods 501 and 5. SOx testing shall be performed using EPA Method 8 and CARB Method 1-100. [District Rules 1081, 2201, 2520, §9.3.2; and 4354, 6.4 and 6.5] Federally Enforceable Through Title V Permit
- 16. Source testing when firing on LPG fuel need not be performed if the LPG fuel usage for this furnace does not exceed 100 hours during any one calendar year. A source test shall be performed within 90 days after this furnace exceeds 100 hours of operation, on LPG, on an annual basis. [District Rule 1081] Federally Enforceable Through Title V Permit
- 17. Source testing shall be conducted by a CARB-certified source testing contractor. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to source testing. The results of each source test shall be submitted to the District within 60 days after the source test date. [District Rule 1081] Federally Enforceable Through Title V Permit
- 18. Source test conditions shall be representative of operations equal to or greater than 60 percent of capacity for each furnace as stated in the Permit to Operate. [District Rule 4354, §6.4.2] Federally Enforceable Through Title V Permit
- 19. For source testing purposes, the arithmetic average of three 30-consecutive-minute test runs shall be used to determine compliance with NOx, CO, VOC, and SOx emission limits. [District Rule 4354] Federally Enforceable Through Title V Permit
- 20. For source testing purposes, the arithmetic average of three 60-consecutive-minute test runs shall be used to determine compliance with PM10 emission limits. [District Rule 4354] Federally Enforceable Through Title V Permit
- 21. For source testing purposes, if two of the three runs individually demonstrate emissions above the applicable limit, the test cannot be used to demonstrate compliance for the furnace, even if the averaged emissions of all three test runs is less than the applicable limit. [District Rule 4354] Federally Enforceable Through Title V Permit
- 22. PM and PM10 source testing shall be conducted downstream of the electrostatic precipitator and the ceramic filter dust collector in the common stack. Furnaces #1, #2, #3, and #4 must operate simultaneously during source testing unless prior approval is obtained from the District. [District Rule 1081] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: GALLO GLASS COMPANY

Location: 605 S SANTA CRUZ AVE, MODESTO, CA 95354

N-1662-1-19 : Jan 23 2023 4:34PM -- KAHLONJ

- 23. An annual Relative Accuracy Test Audit (RATA) shall be performed on the continuous monitoring system as outlined in 40 CFR Part 60 Appendix B. [District Rule 1080] Federally Enforceable Through Title V Permit
- 24. The owner/operator shall perform a relative accuracy test audit (RATA) as specified by 40 CFR Part 60, Appendix F (CGAs and RATAs) and if applicable 40 CFR Part 75, Appendix B (linearity and RATAs) at least once every four calendar quarters and annually within 30 days of the anniversary date of the initial test. The permittee shall comply with the applicable requirements for quality assurance testing and maintenance of the continuous emission monitor equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F. [District Rule 1080] Federally Enforceable Through Title V Permit
- 25. An exceedance of a NOx or SOx emission limit as indicated by the CEMS shall be reported by the operator to the APCO within 24 hours. The notification shall include 1) name and location of the facility, 2) identification of furnace(s) causing the exceedances, 3) calculation of actual NOx, CO and VOC emissions, and 4) corrective actions and schedules to complete the work. [District Rule 1080 and Stanislaus County Rule 1080] Federally Enforceable Through Title V Permit
- 26. The owner or operator shall, upon written notice from the APCO, provide a summary of the data obtained from the CEM systems. This summary of data shall be in the form and the manner prescribed by the APCO. [District Rule 1080, 7.1] Federally Enforceable Through Title V Permit
- 27. Records shall be maintained and shall include: the occurrence and duration of any start-up, shutdown or malfunction, performance testing, evaluations, calibrations, checks, adjustments, any periods during which a continuous monitoring system or monitoring device is inoperative, maintenance of any CEMS that have been installed pursuant to District Rule 1080, and emission measurements. [District Rule 1080] Federally Enforceable Through Title V Permit
- 28. The operator shall notify the APCO no later than one hour after the detection of a breakdown of the CEMS. The operator shall inform the APCO of the intent to shut down the CEMS at least 24 hours prior to the event. [District Rule 1100] Federally Enforceable Through Title V Permit
- 29. The permittee shall submit a written report including copies of any Equipment Breakdown reports and/or pertinent variance decisions to the APCO for each calendar quarter, within 30 days of the end of the quarter, including: time intervals, data and magnitude of excess emissions, nature and cause of excess emissions (if known), corrective actions taken and preventive measures adopted; averaging period used for data reporting shall correspond to the averaging period for each respective emission standard; applicable time and date of each period during which the CEM was inoperative (except for zero and span checks) and the nature of system repairs and adjustments; and a negative declaration when no excess emissions occurred. [District Rule 1080] Federally Enforceable Through Title V Permit
- 30. Upon notice by the District that the facility's CEM system is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the CEM data is sent to the District by a District-approved alternative method. [District Rule 1080] Federally Enforceable Through Title V Permit
- 31. Results of continuous emissions monitoring shall be reduced according to the procedure established in 40 CFR, Part 51, Appendix P, paragraphs 5.0 through 5.3.3, or by other methods deemed equivalent by mutual agreement with the District, the ARB, and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit
- 32. Cylinder gas audits (CGAs) of continuous emission monitors shall be conducted quarterly, except during quarters in which relative accuracy and total accuracy testing is performed, in accordance with EPA guidelines. The District shall be notified prior to completion of the audits. Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rule 1080] Federally Enforceable Through Title V Permit
- 33. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4201, Stanislaus County Rule 404, District Rule 4202 and Stanislaus County Rule 405. A permit shield is granted from these requirements. [District Rule 2520, §13.2] Federally Enforceable Through Title V Permit
- 34. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4801 and Stanislaus County Rule 407. A permit shield is granted from these requirements. [District Rule 2520, §13.2] Federally Enforceable Through Title V Permit

- 35. The requirements of District Rule 4301 and Stanislaus County Rule 408 were determined to not apply to this unit because the unit does not utilize indirect heat transfer. A permit shield is granted from these requirements. [District Rule 2520, §13.2] Federally Enforceable Through Title V Permit
- 36. The requirements of 40 CFR Part 60 Subpart CC were determined not to apply to this unit because the unit was constructed prior to the effective date in the regulation and has not been modified (according to the definition of "modified in the regulation"). A permit shield is granted from these requirements. [District Rule 2520 Section 13.2] Federally Enforceable Through Title V Permit
- 37. The requirements of 40 CFR Part 61, Subpart N were determined to not apply to this unit because the unit does not use commercial arsenic. A permit shield is granted from these requirements. [District Rule 2520, §13.2] Federally Enforceable Through Title V Permit
- 38. Any glass melting furnace located at an Area Source of hazardous air pollutants shall comply with 40 CFR Part 63 Subpart SSSSSS (National Emission Standards for Hazardous Air Pollutants for Glass Manufacturing Area Sources). [40 CFR Part 63 Subpart SSSSSS] Federally Enforceable Through Title V Permit
- 39. The quantity of glass produced shall not exceed 520.1 tons during any one day. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 40. Except during periods of startup, shutdown, and idling, NOx emissions shall not exceed 1.3 pounds per ton of glass produced (over a rolling 30-day average). This performance based limit is to enforce the NOx emission reductions granted by certificate number N-106-2. Any CEM measurement greater than 1.3 lb-NOx/ton of glass produced for each 30-day rolling average constitutes a violation of this emission limit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 41. Except during periods of startup, shutdown, and idling, CO emissions shall not exceed 0.04 pounds per ton of glass produced. This performance based limit is to enforce the CO emission reductions granted by certificate number N-106-3. [District Rule 2201] Federally Enforceable Through Title V Permit
- 42. Except during periods of startup, shutdown, and idling, VOC emissions shall not exceed 0.02 pounds per ton of glass produced. [District Rule 2201] Federally Enforceable Through Title V Permit
- 43. Except during periods of startup, shutdown, and idling, the combined SOx emissions from permit units N-1662-1, N-1662-2, N-1662-3 and N-1662-4, while producing glass with cullet that is equal to or greater than 25% by weight mixed color cullet, shall not exceed 0.95 lb/ton of glass produced (over a rolling 30 day average). [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 44. Except during periods of startup, shutdown, and idling, the combined SOx emissions from permit units N-1662-1, N-1662-2, N-1662-3 and N-1662-4, while producing glass with cullet that is less than 25% by weight mixed color cullet, shall not exceed 0.79 lb/ton of glass produced (over a rolling 30 day average). [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 45. Except during periods of startup, shutdown, idling, and during full or partial emission control system bypass episodes, PM10 emissions shall not exceed 0.45 lb/ton of glass produced. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 46. The PM10 emissions, during full or partial emission control system bypass episodes for routine maintenance, shall not exceed 0.71 lb/ton of glass produced. [District Rule 2201] Federally Enforceable Through Title V Permit
- 47. The emission limits of this permit shall not apply during routine maintenance of the respective add-on control systems. The routine maintenance in each calendar year shall not exceed 144 hours total for all controls and routine maintenance shall be conducted in a manner consistent with good air pollution control practices for minimizing air emissions. Routine maintenance includes, but is not limited to: 1) Calibration and scheduled parts replacement of CEMS equipment per manufacturer's recommendations, 2) Cleaning of particulate control devices and stack ductwork to ensure optimal performance, and 3) Necessary repairs to ensure optimal performance of all parts of the system. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit

- 48. The PM10 emissions shall not exceed 22,936 pounds during the first calendar quarter, 23,190 pounds during the second calendar quarter, 23,445 pounds during the third calendar quarter and 23,445 pounds during the fourth calendar quarter. These limits are to enforce the PM10 emission reductions granted by certificate number N-161-4. [District Rule 2201] Federally Enforceable Through Title V Permit
- 49. The maximum throughput of lime received and stored in the lime storage silo shared with permit units N-1662-1, N-1662-2, N-1662-3 and N-1662-4 shall not exceed either of the following limits: 65 tons-lime/day or 110 tonslime/quarter. [District Rule 2201] Federally Enforceable Through Title V Permit
- 50. PM10 emissions rate from the lime storage silo shared with permit units N-1662-1, N-1662-2, N-1662-3 and N-1662-4 shall not exceed 0.0049 lb-PM10/ton-lime stored. [District Rule 2201] Federally Enforceable Through Title V Permit
- 51. The facility shall not use commercial arsenic as a raw material in the production process. [40 CFR Part 61 Subpart N] Federally Enforceable Through Title V Permit
- 52. Each dust collector and bin vent filter shall be maintained and operated in the range that optimizes control efficiency as recommended by the manufacturer. [District Rule 2201] Federally Enforceable Through Title V Permit
- 53. Each dust collector and bin vent filter's cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
- 54. Material removed from each dust collector and bin vent filter shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
- 55. Replacement filters numbering at least 10% of the total number of filters in the largest dust collector, and for each type of filter, shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
- 56. A spare set of bags or filters shall be maintained on the premises at all times for the bin vent filter serving the lime storage silo shared with permit units N-1662-1, N-1662-2, N-1662-3 and N-1662-4. [District Rule 2201] Federally Enforceable Through Title V Permit
- 57. Devices to measure the primary and secondary voltage and current of the electrostatic precipitator shall be maintained in accordance with the manufacturer's specifications. [District Rule 4354 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 58. When the electrostatic precipitator is in operation, the specific power of the electrostatic precipitator shall be at least 70 milliwatts/acfm except during the bypass episodes allowed by this permit. [District Rule 2520 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 59. The ceramic filter dust collectors shall each be equipped with a pressure differential gauge to indicate the pressure drop across the filters. The gauges shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rules 2201 and 4354 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 60. During operation of the ceramic filter dust collectors, the pressure differential gauge reading shall be 1 to 20 inches of water column. [District Rules 2201 and 4354 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 61. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7. [40 CFR Part 64] Federally Enforceable Through Title V Permit
- 62. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR Part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
- 63. The permittee shall comply with the record keeping and reporting requirements of 40 CFR Part 64.9. [40 CFR Part 64] Federally Enforceable Through Title V Permit
- 64. When the electrostatic precipitator is in operation, the specific power of the electrostatic precipitator shall be continuously monitored and recorded. [District Rules 2201 and 4354, and 40 CFR Part 64] Federally Enforceable Through Title V Permit

605 S SANTA CRUZ AVE, MODESTO, CA 95354 Location:

N-1662-1-19 : Jan 23 2023 4:34PM -- KAHLONJ

- 65. Dust collector filters shall be inspected annually while in operation for evidence of particulate matter breakthrough and replaced as needed. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 66. Dust collector filters shall be inspected annually while not in operation for tears, scuffs, abrasions or hole that might interfere with the PM collection efficiency and shall be replaced as needed. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 67. Permittee shall keep a record of the daily hours of operation, the amount of glass pulled from the furnace (in tons), the NOx emissions (in lb/ton of glass pulled), the SOx emissions (in lb/ton of glass pulled), the weight of mixed color mix cullet used, the total amount of cullet used (by weight) and the ratio of the mixed color cullet weight to the total cullet weight (in percent). [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 68. Permittee shall maintain records of the following: 1) Source tests and source test results, 2) the acceptable range for each approved key system operating parameter, as established during source tests, 3) The operating values of the key system operating parameters at the approved recording frequency, 4) any maintenance and repair, and 5) any malfunctions. [District Rule 4354] Federally Enforceable Through Title V Permit
- 69. The pollutant mass emission rate in lb/hr shall be converted to lb pollutant/ton of glass pulled as specified in Rule 4354. The operator of a oxy-fuel fired furnace, oxygen-assisted combustion furnace, or a furnace utilizing any fuel oxidants other than 100% ambient air, shall submit to the APCO, ARB, and EPA for approval any methodologies and data that will be used to calculate emission rates for NOx, CO, and VOC if the methods are different from those specified in Rule 4354. Unless the operator received prior written approval from APCO, ARB, and EPA of all the calculation methods to be used that are different from those specified in Rule 4354, compliance with the emissions limits cannot be fully demonstrated, and it shall be deemed to be a violation of the rule. [District Rule 4354] Federally Enforceable Through Title V Permit
- 70. The oxygen to fuel ratio shall be continuously monitored and recorded. [District Rule 4354] Federally Enforceable Through Title V Permit
- 71. The permittee shall maintain daily records of the aggregated NOx emissions. [District Rules 2520, 9.3.2 and 4354, 9.6.1 and 9.7] Federally Enforceable Through Title V Permit
- 72. The permittee shall maintain the burner oxygen to fuel ratio records required by this permit. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 73. A record of the PM10 emissions from this unit, in pounds per calendar quarter, shall be kept. [District Rule 2201] Federally Enforceable Through Title V Permit
- 74. A record of the cumulative annual number of hours that the emission control system is either fully or partially bypassed shall be kept. The record shall be updated at least weekly. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 75. The permittee shall keep a record of the cumulative annual hours of operation of the glass furnace on LPG fuel. [District Rule 2201] Federally Enforceable Through Title V Permit
- 76. When the electrostatic precipitator is in operation, the permittee shall maintain daily records of the specific power of the electrostatic precipitator (in milliwatts/acfm). [District Rules 2201, 4354, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 77. The operator shall monitor and record the pressure differential gauge reading of each ceramic filter dust collector at least once during each day that the units operate. [District Rules 2201 and 4354 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 78. Records of dust collector and bin vent filter maintenance, inspections and repairs shall be maintained. The records shall include, date of inspection, change outs of filter media, corrective action taken, and identification of the individual performing the inspection. [District Rules 2201 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 79. Records of daily and quarterly amount of lime transferred into the lime storage silo shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit

Location: 605 S SANTA CRUZ AVE, MODESTO, CA 95354

80. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 2201 and 4354 and 40 CFR Part 64] Federally Enforceable Through Title V Permit

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1662-2-21 EXPIRATION DATE: 06/30/2026

EQUIPMENT DESCRIPTION:

GLASS FURNACE #2 WITH 10 NORTH AMERICAN PRAXAIR GEN III GAS/OXYGEN BURNERS (75 MMBTU/HR MAX HEAT CAPACITY), AND ASSOCIATED FORMING EQUIPMENT INCLUDING FOREHEARTHS, COATING, AND CHAIN BURNERS, THIS FURNACE IS DUCTED THROUGH A STACK COMMON TO PERMIT UNITS N-1662-1, N-1662-2, N-1662-3 AND N-1662-4. THE FURNACES ARE SERVED BY THE FOLLOWING SHARED EQUIPMENT: SOX SCRUBBER INCLUDING A LIME STORAGE SILO SERVED BY A BIN VENT FILTER, AN ELECTROSTATIC PRECIPITATOR, AND/OR FOUR TRI-MER UCF-500 CERAMIC FILTER DUST COLLECTORS

PERMIT UNIT REQUIREMENTS

- No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102] 1.
- 2. Particulate matter emissions shall not exceed 0.1 grain/dscf in concentration. [District Rule 4201 and Stanislaus County Rule 404] Federally Enforceable Through Title V Permit
- The furnace shall be fired on natural gas and LPG only. [District Rule 2201] Federally Enforceable Through Title V
- The furnace shall have continuous monitoring systems for NOx and SOx. The monitoring devices shall have continuous recording devices, and all records shall be kept on site. [District Rules 1080 and 4354, §5.9] Federally Enforceable Through Title V Permit
- One continuous emissions monitoring (CEM) system may be used for monitoring oxy-fuel fired furnaces #1, #2, #3, and #4 provided all of the exhaust gases of each of these furnaces are ducted to a common stack, and monitored down stream of the common stack. The CEMS shall comply with the requirements of 40 Code of Federal Regulations (CFR) Part 51, 40 CFR Parts 60.7 and 60.13, 40 CFR Part 60 Appendix B (Performance Specifications) and Appendix F (Quality Assurance Procedures) and the applicable sections of Rule 1080 (Stack Monitoring). [District Rule 4354, 5.9 and 6.6.1] Federally Enforceable Through Title V Permit
- The facility shall install and maintain equipment, facilities, and systems compatible with the District's CEM data polling software system and shall make CEM data available to the District's automated polling system on a daily basis. [District Rule 1080] Federally Enforceable Through Title V Permit
- The common exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NOx, CO, and O2 analyzer during District inspections. The sampling ports shall be located in accordance with the CARB regulation titled California Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Source Emission Monitoring and Testing. [District Rule 1081] Federally Enforceable Through Title V Permit
- The permittee shall notify the District at least 24 hours prior to initiating idling, shutdown, or startup of the glass furnace and this notification shall include: The date and time of the start of the exempt operation, reason for performing the operation, and an estimated completion date. The permittee shall notify the District within 24 hours after completion of the operation and shall maintain operating records and/or support documentation necessary to claim exemption. [District Rule 4354] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: GALLO GLASS COMPANY

605 S SANTA CRUZ AVE, MODESTO, CA 95354 Location: N-1662-2-21 : Jan 23 2023 4:34PM -- KAHLONJ

- 9. The emission control systems shall be in operation whenever conditions are consistent with equipment manufacturer's specifications during startup, idling and shutdown periods. [District Rule 4354] Federally Enforceable Through Title V Permit
- 10. The duration of a furnace shutdown shall not exceed 20 days, measured from the time furnace operations drop below the idle threshold specified in Section 3.17 of District Rule 4354 to when all emissions from the furnace cease. [District Rule 4354] Federally Enforceable Through Title V Permit
- 11. NOx, CO, VOC, SOx, and PM10 emissions during idling shall not exceed the amount as calculated using the following equation: NOx, CO, VOC, SOx, or PM10 (lb/day) = Applicable emission limit (lb/ton) x Furnace permitted production capacity (tons/day). [District Rule 4354] Federally Enforceable Through Title V Permit
- 12. The oxygen to fuel ratio shall be maintained within the range shown by the most recent source test to result in compliance with the CO and VOC limits of this permit. The acceptable range of the oxygen to fuel ratio shall be established during the initial source test and during each subsequent annual source test. [District Rule 4354] Federally Enforceable Through Title V Permit
- 13. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation E=3.59P^0.62 (P< 30 tph) or E=17.31P^0.16 (P> 30 tph). [District Rule 4202] Federally Enforceable Through Title V Permit
- 14. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [Stanislaus County Rule 407 and District Rule 4801] Federally Enforceable Through Title V Permit
- 15. Source testing to demonstrate compliance with permit conditions and all rules and regulations for both natural gas and LPG shall be conducted within 60 days after the end of the start-up exemption, and at least once every calendar year thereafter. NOx and CO testing shall be performed using CARB Method 100. VOC testing shall be performed using EPA methods 201 and 202, EPA methods 201a and 202, or CARB methods 501 and 5. SOx testing shall be performed using EPA Method 8 and CARB Method 1-100. [District Rules 1081, 2201, 2520, §9.3.2; and 4354, 6.4 and 6.5] Federally Enforceable Through Title V Permit
- 16. Source testing when firing on LPG fuel need not be performed if the LPG fuel usage for this furnace does not exceed 100 hours during any one calendar year. A source test shall be performed within 90 days after this furnace exceeds 100 hours of operation, on LPG, on an annual basis. [District Rule 1081] Federally Enforceable Through Title V Permit
- 17. Source testing shall be conducted by a CARB-certified source testing contractor. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to source testing. The results of each source test shall be submitted to the District within 60 days after the source test date. [District Rule 1081] Federally Enforceable Through Title V Permit
- 18. Source test conditions shall be representative of operations equal to or greater than 60 percent of capacity for each furnace as stated in the Permit to Operate. [District Rule 4354, §6.4.2] Federally Enforceable Through Title V Permit
- 19. For source testing purposes, the arithmetic average of three 30-consecutive-minute test runs shall be used to determine compliance with NOx, CO, VOC, and SOx emission limits. [District Rule 4354] Federally Enforceable Through Title V Permit
- 20. For source testing purposes, the arithmetic average of three 60-consecutive-minute test runs shall be used to determine compliance with PM10 emission limits. [District Rule 4354] Federally Enforceable Through Title V Permit
- 21. For source testing purposes, if two of the three runs individually demonstrate emissions above the applicable limit, the test cannot be used to demonstrate compliance for the furnace, even if the averaged emissions of all three test runs is less than the applicable limit. [District Rule 4354] Federally Enforceable Through Title V Permit
- 22. PM and PM10 source testing shall be conducted downstream of the electrostatic precipitator and the ceramic filter dust collector in the common stack. Furnaces #1, #2, #3, and #4 must operate simultaneously during source testing unless prior approval is obtained from the District. [District Rule 1081] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: GALLO GLASS COMPANY

Location: 605 S SANTA CRUZ AVE, MODESTO, CA 95354

- 23. An annual Relative Accuracy Test Audit (RATA) shall be performed on the continuous monitoring system as outlined in 40 CFR Part 60 Appendix B. [District Rule 1080] Federally Enforceable Through Title V Permit
- 24. The owner/operator shall perform a relative accuracy test audit (RATA) as specified by 40 CFR Part 60, Appendix F (CGAs and RATAs) and if applicable 40 CFR Part 75, Appendix B (linearity and RATAs) at least once every four calendar quarters and annually within 30 days of the anniversary date of the initial test. The permittee shall comply with the applicable requirements for quality assurance testing and maintenance of the continuous emission monitor equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F. [District Rule 1080] Federally Enforceable Through Title V Permit
- 25. An exceedance of a NOx or SOx emission limit as indicated by the CEMS shall be reported by the operator to the APCO within 24 hours. The notification shall include 1) name and location of the facility, 2) identification of furnace(s) causing the exceedances, 3) calculation of actual NOx, CO and VOC emissions, and 4) corrective actions and schedules to complete the work. [District Rule 1080 and Stanislaus County Rule 1080] Federally Enforceable Through Title V Permit
- 26. The owner or operator shall, upon written notice from the APCO, provide a summary of the data obtained from the CEM systems. This summary of data shall be in the form and the manner prescribed by the APCO. [District Rule 1080, 7.1] Federally Enforceable Through Title V Permit
- 27. Records shall be maintained and shall include: the occurrence and duration of any start-up, shutdown or malfunction, performance testing, evaluations, calibrations, checks, adjustments, any periods during which a continuous monitoring system or monitoring device is inoperative, maintenance of any CEMS that have been installed pursuant to District Rule 1080, and emission measurements. [District Rule 1080] Federally Enforceable Through Title V Permit
- 28. The operator shall notify the APCO no later than one hour after the detection of a breakdown of the CEMS. The operator shall inform the APCO of the intent to shut down the CEMS at least 24 hours prior to the event. [District Rule 1100] Federally Enforceable Through Title V Permit
- 29. The permittee shall submit a written report including copies of any Equipment Breakdown reports and/or pertinent variance decisions to the APCO for each calendar quarter, within 30 days of the end of the quarter, including: time intervals, data and magnitude of excess emissions, nature and cause of excess emissions (if known), corrective actions taken and preventive measures adopted; averaging period used for data reporting shall correspond to the averaging period for each respective emission standard; applicable time and date of each period during which the CEM was inoperative (except for zero and span checks) and the nature of system repairs and adjustments; and a negative declaration when no excess emissions occurred. [District Rule 1080] Federally Enforceable Through Title V Permit
- 30. Upon notice by the District that the facility's CEM system is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the CEM data is sent to the District by a District-approved alternative method. [District Rule 1080] Federally Enforceable Through Title V Permit
- 31. Results of continuous emissions monitoring shall be reduced according to the procedure established in 40 CFR, Part 51, Appendix P, paragraphs 5.0 through 5.3.3, or by other methods deemed equivalent by mutual agreement with the District, the ARB, and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit
- 32. Cylinder gas audits (CGAs) of continuous emission monitors shall be conducted quarterly, except during quarters in which relative accuracy and total accuracy testing is performed, in accordance with EPA guidelines. The District shall be notified prior to completion of the audits. Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rule 1080] Federally Enforceable Through Title V Permit
- 33. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4201, Stanislaus County Rule 404, District Rule 4202 and Stanislaus County Rule 405. A permit shield is granted from these requirements. [District Rule 2520, §13.2] Federally Enforceable Through Title V Permit
- 34. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4801 and Stanislaus County Rule 407. A permit shield is granted from these requirements. [District Rule 2520, §13.2] Federally Enforceable Through Title V Permit

605 S SANTA CRUZ AVE, MODESTO, CA 95354 Location: N-1662-2-21 : Jan 23 2023 4:34PM -- KAHLONJ

- 35. The requirements of District Rule 4301 and Stanislaus County Rule 408 were determined to not apply to this unit because the unit does not utilize indirect heat transfer. A permit shield is granted from these requirements. [District Rule 2520, §13.2] Federally Enforceable Through Title V Permit
- 36. The requirements of 40 CFR Part 61, Subpart N were determined to not apply to this unit because the unit does not use commercial arsenic. A permit shield is granted from these requirements. [District Rule 2520, §13.2] Federally Enforceable Through Title V Permit
- 37. Any glass melting furnace located at an Area Source of hazardous air pollutants shall comply with 40 CFR Part 63 Subpart SSSSSS (National Emission Standards for Hazardous Air Pollutants for Glass Manufacturing Area Sources). [40 CFR Part 63 Subpart SSSSSS] Federally Enforceable Through Title V Permit
- 38. The quantity of glass produced shall not exceed 430 tons during any one day. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 39. Except during periods of startup, shutdown, and idling, NOx emissions shall not exceed 1.3 pounds per ton of glass produced (over a rolling 30-day average). This performance based limit is to enforce the NOx emission reductions granted by certificate number N-54-2. Any CEM measurement greater than 1.3 lb-NOx/ton of glass produced for each 30-day rolling average constitutes a violation of this emission limit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 40. Except during periods of startup, shutdown, and idling, CO emissions shall not exceed 0.2 pounds per ton of glass produced. [District Rule 2201] Federally Enforceable Through Title V Permit
- 41. Except during periods of startup, shutdown, and idling, VOC emissions shall not exceed 0.02 pounds per ton of glass produced. [District Rule 2201] Federally Enforceable Through Title V Permit
- 42. Except during periods of startup, shutdown, and idling, the combined SOx emissions from permit units N-1662-1, N-1662-2, N-1662-3 and N-1662-4, while producing glass with cullet that is equal to or greater than 25% by weight mixed color cullet, shall not exceed 0.95 lb/ton of glass produced (over a rolling 30 day average). [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 43. Except during periods of startup, shutdown, and idling, the combined SOx emissions from permit units N-1662-1, N-1662-2, N-1662-3 and N-1662-4, while producing glass with cullet that is less than 25% by weight mixed color cullet, shall not exceed 0.79 lb/ton of glass produced (over a rolling 30 day average). [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 44. Except during periods of startup, shutdown, idling, and during full or partial emission control system bypass episodes, PM10 emissions shall not exceed 0.45 lb/ton of glass produced. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 45. The PM10 emissions, during full or partial emission control system bypass episodes for routine maintenance, shall not exceed 0.71 lb/ton of glass produced. [District Rule 2201] Federally Enforceable Through Title V Permit
- 46. PM emissions from the glass furnace shall not exceed 1 lb of particulate matter per ton of glass produced. [40 CFR 60.293(b)(1)] Federally Enforceable Through Title V Permit
- 47. The emission limits of this permit shall not apply during routine maintenance of the respective add-on control systems. The routine maintenance in each calendar year shall not exceed 144 hours total for all controls and routine maintenance shall be conducted in a manner consistent with good air pollution control practices for minimizing air emissions. Routine maintenance includes, but is not limited to: 1) Calibration and scheduled parts replacement of CEMS equipment per manufacturer's recommendations, 2) Cleaning of particulate control devices and stack ductwork to ensure optimal performance, and 3) Necessary repairs to ensure optimal performance of all parts of the system. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 48. The PM10 emissions shall not exceed 18,712 pounds during the first calendar quarter, 18,919 pounds during the second calendar quarter, 19,127 pounds during the third calendar quarter and 19,128 pounds during the fourth calendar quarter. These limits are to enforce the PM10 emission reductions granted by certificate number N-161-4. [District Rule 2201] Federally Enforceable Through Title V Permit

Location: 605 S SANTA CRUZ AVE, MODESTO, CA 95354

- 49. The maximum throughput of lime received and stored in the lime storage silo shared with permit units N-1662-1, N-1662-2, N-1662-3 and N-1662-4 shall not exceed either of the following limits: 65 tons-lime/day or 110 tonslime/quarter. [District Rule 2201] Federally Enforceable Through Title V Permit
- 50. PM10 emissions rate from the lime storage silo shared with permit units N-1662-1, N-1662-2, N-1662-3 and N-1662-4 shall not exceed 0.0049 lb-PM10/ton-lime stored. [District Rule 2201] Federally Enforceable Through Title V Permit
- 51. The facility shall not use commercial arsenic as a raw material in the production process. [40 CFR Part 61 Subpart N] Federally Enforceable Through Title V Permit
- 52. Each dust collector and bin vent filter shall be maintained and operated in the range that optimizes control efficiency as recommended by the manufacturer. [District Rule 2201] Federally Enforceable Through Title V Permit
- 53. Each dust collector and bin vent filter's cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
- 54. Material removed from each dust collector and bin vent filter shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
- 55. Replacement filters numbering at least 10% of the total number of filters in the largest dust collector, and for each type of filter, shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
- 56. A spare set of bags or filters shall be maintained on the premises at all times for the bin vent filter serving the lime storage silo shared with permit units N-1662-1, N-1662-2, N-1662-3 and N-1662-4. [District Rule 2201] Federally Enforceable Through Title V Permit
- 57. Devices to measure the primary and secondary voltage and current of the electrostatic precipitator shall be maintained in accordance with the manufacturer's specifications. [District Rule 4354, 40 CFR 60.293(d) and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 58. When the electrostatic precipitator is in operation, the specific power of the electrostatic precipitator shall be at least 70 milliwatts/acfm except during the bypass episodes allowed by this permit. [District Rule 2520, §9.3.2, 40 CFR 60.293(d), and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 59. The ceramic filter dust collectors shall each be equipped with a pressure differential gauge to indicate the pressure drop across the filters. The gauges shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rules 2201 and 4354 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 60. During operation of the ceramic filter dust collectors, the pressure differential gauge reading shall be 1 to 20 inches of water column. [District Rules 2201 and 4354 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 61. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7. [40 CFR Part 64] Federally Enforceable Through Title V Permit
- 62. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR Part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
- 63. The permittee shall comply with the record keeping and reporting requirements of 40 CFR Part 64.9. [40 CFR Part 64] Federally Enforceable Through Title V Permit
- 64. When the electrostatic precipitator is in operation, the specific power of the electrostatic precipitator shall be continuously monitored and recorded. [District Rules 2201 and 4354, 40 CFR 60.293(d), and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 65. Dust collector filters shall be inspected annually while in operation for evidence of particulate matter breakthrough and replaced as needed. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 66. Dust collector filters shall be inspected annually while not in operation for tears, scuffs, abrasions or hole that might interfere with the PM collection efficiency and shall be replaced as needed. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

605 S SANTA CRUZ AVE, MODESTO, CA 95354 Location:

- 67. Permittee shall keep a record of the daily hours of operation, the amount of glass pulled from the furnace (in tons), the NOx emissions (in lb/ton of glass pulled), the SOx emissions (in lb/ton of glass pulled), the weight of mixed color mix cullet used, the total amount of cullet used (by weight) and the ratio of the mixed color cullet weight to the total cullet weight (in percent). [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 68. Permittee shall maintain records of the following: 1) Source tests and source test results, 2) the acceptable range for each approved key system operating parameter, as established during source tests, 3) The operating values of the key system operating parameters at the approved recording frequency, 4) any maintenance and repair, and 5) any malfunctions. [District Rule 4354] Federally Enforceable Through Title V Permit
- 69. The pollutant mass emission rate in lb/hr shall be converted to lb pollutant/ton of glass pulled as specified in Rule 4354. The operator of a oxy-fuel fired furnace, oxygen-assisted combustion furnace, or a furnace utilizing any fuel oxidants other than 100% ambient air, shall submit to the APCO, ARB, and EPA for approval any methodologies and data that will be used to calculate emission rates for NOx, CO, and VOC if the methods are different from those specified in Rule 4354. Unless the operator received prior written approval from APCO, ARB, and EPA of all the calculation methods to be used that are different from those specified in Rule 4354, compliance with the emissions limits cannot be fully demonstrated, and it shall be deemed to be a violation of the rule. [District Rule 4354] Federally Enforceable Through Title V Permit
- 70. The oxygen to fuel ratio shall be continuously monitored and recorded. [District Rule 4354] Federally Enforceable Through Title V Permit
- 71. The permittee shall maintain daily records of the aggregated NOx emissions. [District Rules 2520, 9.3.2 and 4354, 9.6.1 and 9.7] Federally Enforceable Through Title V Permit
- 72. The permittee shall maintain the burner oxygen to fuel ratio records required by this permit. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 73. A record of the PM10 emissions from this unit, in pounds per calendar quarter, shall be kept. [District Rule 2201] Federally Enforceable Through Title V Permit
- 74. A record of the cumulative annual number of hours that the emission control system is either fully or partially bypassed shall be kept. The record shall be updated at least weekly. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 75. The permittee shall keep a record of the cumulative annual hours of operation of the glass furnace on LPG fuel. [District Rule 2201] Federally Enforceable Through Title V Permit
- 76. When the electrostatic precipitator is in operation, the permittee shall maintain daily records of the specific power of the electrostatic precipitator (in milliwatts/acfm). [District Rules 2201, 4354, 40 CFR 60.293(d), and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 77. The operator shall monitor and record the pressure differential gauge reading of each ceramic filter dust collector at least once during each day that the units operate. [District Rules 2201 and 4354 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 78. Records of dust collector and bin vent filter maintenance, inspections and repairs shall be maintained. The records shall include, date of inspection, change outs of filter media, corrective action taken, and identification of the individual performing the inspection. [District Rules 2201 and 2520, 9.4.2] Federally Enforceable Through Title V Permit

- 79. The permittee shall maintain records of the actual NO2, PM10, and PM emissions from this unit for each 12 consecutive-month rolling period for a period of 10 years from July 24, 2016 for the purposes of demonstrating that there has not been a PSD "significant net emissions increase" above the baseline actual NO2, PM10, and PM emission levels reported under projects N-1141107 and N-1142733. The actual net emissions increase shall be calculated in accordance with 40 CFR 52.21 (June 16, 2011 version). If a significant net emissions increase for NO2, PM10, and PM emissions occurs during any 12 consecutive month period in the 10 year recordkeeping period, the permittee shall submit a permit application to modify the permit to meet the Prevention of Significant Deterioration requirements that were avoided under projects N1141107 and N-1142733, which are the public notice and modeling requirements of 40 CFR 52.21 (June 16, 2011 version). Actual PM and PM10 emissions for the furnace may be calculated using source test results and the throughput of the glass furnace. [District Rule 2201] Federally Enforceable Through Title V Permit
- 80. Records of daily and quarterly amount of lime transferred into the lime storage silo shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
- 81. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 2201 and 4354 and 40 CFR Part 64] Federally Enforceable Through Title V Permit

San Joaquin Valley Air Pollution Control District

EXPIRATION DATE: 06/30/2026 **PERMIT UNIT:** N-1662-3-20

EQUIPMENT DESCRIPTION:

GLASS FURNACE #3 WITH 10 PRAXAIR GEN III GAS/OXYGEN BURNERS AND ASSOCIATED FORMING EQUIPMENT (75 MMBTU/HR MAX HEAT CAPACITY) AND A 2700 KW ELECTRIC BOOST SYSTEM. THIS FURNACE IS DUCTED THROUGH A STACK COMMON TO PERMIT UNITS N-1662-1, N-1662-2, N-1662-3 AND N-1662-4, THE FURNACES ARE SERVED BY THE FOLLOWING SHARED EQUIPMENT: SOX SCRUBBER INCLUDING A LIME STORAGE SILO SERVED BY A BIN VENT FILTER, AN ELECTROSTATIC PRECIPITATOR, AND/OR FOUR TRI-MER UCF-500 CERAMIC FILTER DUST COLLECTORS

PERMIT UNIT REQUIREMENTS

- No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102] 1.
- 2. Particulate matter emissions shall not exceed 0.1 grain/dscf in concentration. [District Rule 4201 and Stanislaus County Rule 404] Federally Enforceable Through Title V Permit
- The furnace shall be fired on natural gas and LPG only. [District Rule 2201] Federally Enforceable Through Title V
- The furnace shall have continuous monitoring systems for NOx and SOx. The monitoring devices shall have continuous recording devices, and all records shall be kept on site. [District Rules 1080 and 4354, §5.9] Federally Enforceable Through Title V Permit
- One continuous emissions monitoring (CEM) system may be used for monitoring oxy-fuel fired furnaces #1, #2, #3, and #4 provided all of the exhaust gases of each of these furnaces are ducted to a common stack, and monitored down stream of the common stack. The CEMS shall comply with the requirements of 40 Code of Federal Regulations (CFR) Part 51, 40 CFR Parts 60.7 and 60.13, 40 CFR Part 60 Appendix B (Performance Specifications) and Appendix F (Quality Assurance Procedures) and the applicable sections of Rule 1080 (Stack Monitoring). [District Rule 4354, 5.9 and 6.6.1] Federally Enforceable Through Title V Permit
- The facility shall install and maintain equipment, facilities, and systems compatible with the District's CEM data polling software system and shall make CEM data available to the District's automated polling system on a daily basis. [District Rule 1080] Federally Enforceable Through Title V Permit
- The common exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NOx, CO, and O2 analyzer during District inspections. The sampling ports shall be located in accordance with the CARB regulation titled California Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Source Emission Monitoring and Testing. [District Rule 1081] Federally Enforceable Through Title V Permit
- The permittee shall notify the District at least 24 hours prior to initiating idling, shutdown, or startup of the glass furnace and this notification shall include: The date and time of the start of the exempt operation, reason for performing the operation, and an estimated completion date. The permittee shall notify the District within 24 hours after completion of the operation and shall maintain operating records and/or support documentation necessary to claim exemption. [District Rule 4354] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: GALLO GLASS COMPANY

605 S SANTA CRUZ AVE, MODESTO, CA 95354 Location:

- The emission control systems shall be in operation whenever conditions are consistent with equipment manufacturer's specifications during startup, idling and shutdown periods. [District Rule 4354] Federally Enforceable Through Title V Permit
- 10. The duration of a furnace shutdown shall not exceed 20 days, measured from the time furnace operations drop below the idle threshold specified in Section 3.17 of District Rule 4354 to when all emissions from the furnace cease. [District Rule 4354] Federally Enforceable Through Title V Permit
- 11. NOx, CO, VOC, SOx, and PM10 emissions during idling shall not exceed the amount as calculated using the following equation: NOx, CO, VOC, SOx, or PM10 (lb/day) = Applicable emission limit (lb/ton) x Furnace permitted production capacity (tons/day). [District Rule 4354] Federally Enforceable Through Title V Permit
- 12. The oxygen to fuel ratio shall be maintained within the range shown by the most recent source test to result in compliance with the CO and VOC limits of this permit. The acceptable range of the oxygen to fuel ratio shall be established during the initial source test and during each subsequent annual source test. [District Rule 4354] Federally Enforceable Through Title V Permit
- 13. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation E=3.59P⁰.62 (P<30 tph) or E=17.31P⁰.16 (P>30 tph). [District Rule 4202] Federally Enforceable Through Title V Permit
- 14. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [Stanislaus County Rule 407 and District Rule 4801] Federally Enforceable Through Title V Permit
- 15. Source testing to demonstrate compliance with permit conditions and all rules and regulations for both natural gas and LPG shall be conducted within 60 days after the end of the start-up exemption, and at least once every calendar year thereafter. NOx and CO testing shall be performed using CARB Method 100. VOC testing shall be performed using EPA method 25A. PM10 testing shall be performed using EPA methods 201 and 202, EPA methods 201a and 202, or CARB methods 501 and 5. SOx testing shall be performed using EPA Method 8 and CARB Method 1-100. [District Rules 1081, 2201, 2520, §9.3.2; and 4354, 6.4 and 6.5] Federally Enforceable Through Title V Permit
- 16. Source testing when firing on LPG fuel need not be performed if the LPG fuel usage for this furnace does not exceed 100 hours during any one calendar year. A source test shall be performed within 90 days after this furnace exceeds 100 hours of operation, on LPG, on an annual basis. [District Rule 1081] Federally Enforceable Through Title V
- 17. Source testing shall be conducted by a CARB-certified source testing contractor. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to source testing. The results of each source test shall be submitted to the District within 60 days after the source test date. [District Rule 1081] Federally Enforceable Through Title V Permit
- 18. Source test conditions shall be representative of operations equal to or greater than 60 percent of capacity for each furnace as stated in the Permit to Operate. [District Rule 4354, §6.4.2] Federally Enforceable Through Title V Permit
- 19. For source testing purposes, the arithmetic average of three 30-consecutive-minute test runs shall be used to determine compliance with NOx, CO, VOC, and SOx emission limits. [District Rule 4354] Federally Enforceable Through Title V Permit
- 20. For source testing purposes, the arithmetic average of three 60-consecutive-minute test runs shall be used to determine compliance with PM10 emission limits. [District Rule 4354] Federally Enforceable Through Title V Permit
- 21. For source testing purposes, if two of the three runs individually demonstrate emissions above the applicable limit, the test cannot be used to demonstrate compliance for the furnace, even if the averaged emissions of all three test runs is less than the applicable limit. [District Rule 4354] Federally Enforceable Through Title V Permit
- 22. PM and PM10 source testing shall be conducted downstream of the electrostatic precipitator and the ceramic filter dust collector in the common stack. Furnaces #1, #2, #3, and #4 must operate simultaneously during source testing unless prior approval is obtained from the District. [District Rule 1081] Federally Enforceable Through Title V Permit

605 S SANTA CRUZ AVE, MODESTO, CA 95354 Location:

- 23. An annual Relative Accuracy Test Audit (RATA) shall be performed on the continuous monitoring system as outlined in 40 CFR Part 60 Appendix B. [District Rule 1080] Federally Enforceable Through Title V Permit
- 24. The owner/operator shall perform a relative accuracy test audit (RATA) as specified by 40 CFR Part 60, Appendix F (CGAs and RATAs) and if applicable 40 CFR Part 75, Appendix B (linearity and RATAs) at least once every four calendar quarters and annually within 30 days of the anniversary date of the initial test. The permittee shall comply with the applicable requirements for quality assurance testing and maintenance of the continuous emission monitor equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F. [District Rule 1080] Federally Enforceable Through Title V Permit
- 25. An exceedance of a NOx or SOx emission limit as indicated by the CEMS shall be reported by the operator to the APCO within 24 hours. The notification shall include 1) name and location of the facility, 2) identification of furnace(s) causing the exceedances, 3) calculation of actual NOx, CO and VOC emissions, and 4) corrective actions and schedules to complete the work. [District Rule 1080 and Stanislaus County Rule 1080] Federally Enforceable Through Title V Permit
- 26. The owner or operator shall, upon written notice from the APCO, provide a summary of the data obtained from the CEM systems. This summary of data shall be in the form and the manner prescribed by the APCO. [District Rule 1080, 7.1] Federally Enforceable Through Title V Permit
- 27. Records shall be maintained and shall include: the occurrence and duration of any start-up, shutdown or malfunction, performance testing, evaluations, calibrations, checks, adjustments, any periods during which a continuous monitoring system or monitoring device is inoperative, maintenance of any CEMS that have been installed pursuant to District Rule 1080, and emission measurements. [District Rule 1080] Federally Enforceable Through Title V Permit
- 28. The operator shall notify the APCO no later than one hour after the detection of a breakdown of the CEMS. The operator shall inform the APCO of the intent to shut down the CEMS at least 24 hours prior to the event. [District Rule 1100] Federally Enforceable Through Title V Permit
- 29. The permittee shall submit a written report including copies of any Equipment Breakdown reports and/or pertinent variance decisions to the APCO for each calendar quarter, within 30 days of the end of the quarter, including: time intervals, data and magnitude of excess emissions, nature and cause of excess emissions (if known), corrective actions taken and preventive measures adopted; averaging period used for data reporting shall correspond to the averaging period for each respective emission standard; applicable time and date of each period during which the CEM was inoperative (except for zero and span checks) and the nature of system repairs and adjustments; and a negative declaration when no excess emissions occurred. [District Rule 1080] Federally Enforceable Through Title V Permit
- 30. Upon notice by the District that the facility's CEM system is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the CEM data is sent to the District by a District-approved alternative method. [District Rule 1080] Federally Enforceable Through Title V Permit
- 31. Results of continuous emissions monitoring shall be reduced according to the procedure established in 40 CFR, Part 51, Appendix P, paragraphs 5.0 through 5.3.3, or by other methods deemed equivalent by mutual agreement with the District, the ARB, and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit
- 32. Cylinder gas audits (CGAs) of continuous emission monitors shall be conducted quarterly, except during quarters in which relative accuracy and total accuracy testing is performed, in accordance with EPA guidelines. The District shall be notified prior to completion of the audits. Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rule 1080] Federally Enforceable Through Title V Permit
- 33. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4201, Stanislaus County Rule 404, District Rule 4202 and Stanislaus County Rule 405. A permit shield is granted from these requirements. [District Rule 2520, §13.2] Federally Enforceable Through Title V Permit
- 34. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4801 and Stanislaus County Rule 407. A permit shield is granted from these requirements. [District Rule 2520, §13.2] Federally Enforceable Through Title V Permit

605 S SANTA CRUZ AVE, MODESTO, CA 95354 Location:

- 35. The requirements of District Rule 4301 and Stanislaus County Rule 408 were determined to not apply to this unit because the unit does not utilize indirect heat transfer. A permit shield is granted from these requirements. [District Rule 2520, §13.2] Federally Enforceable Through Title V Permit
- 36. The requirements of 40 CFR Part 61, Subpart N were determined to not apply to this unit because the unit does not use commercial arsenic. A permit shield is granted from these requirements. [District Rule 2520, §13.2] Federally Enforceable Through Title V Permit
- 37. Any glass melting furnace located at an Area Source of hazardous air pollutants shall comply with 40 CFR Part 63 Subpart SSSSSS (National Emission Standards for Hazardous Air Pollutants for Glass Manufacturing Area Sources). [40 CFR Part 63 Subpart SSSSSS] Federally Enforceable Through Title V Permit
- 38. The quantity of glass produced shall not exceed 430 tons during any one day. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 39. Except during periods of startup, shutdown, and idling, NOx emissions shall not exceed 1.3 pounds per ton of glass produced (over a rolling 30-day average). This performance based limit is to enforce the NOx emission reductions granted by certificate number N-56-2. Any CEM measurement greater than 1.3 lb-NOx/ton of glass produced for each 30-day rolling average constitutes a violation of this emission limit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 40. Except during periods of startup, shutdown, and idling, CO emissions shall not exceed 0.01 pounds per ton of glass produced. This performance based limit is to enforce the CO emission reductions granted by certificate number N-56-3. [District Rule 2201] Federally Enforceable Through Title V Permit
- 41. Except during periods of startup, shutdown, and idling, VOC emissions shall not exceed 0.02 pounds per ton of glass produced. [District Rule 2201] Federally Enforceable Through Title V Permit
- 42. Except during periods of startup, shutdown, and idling, the combined SOx emissions from permit units N-1662-1, N-1662-2, N-1662-3 and N-1662-4, while producing glass with cullet that is equal to or greater than 25% by weight mixed color cullet, shall not exceed 0.95 lb/ton of glass produced (over a rolling 30 day average). [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 43. Except during periods of startup, shutdown, and idling, the combined SOx emissions from permit units N-1662-1, N-1662-2, N-1662-3 and N-1662-4, while producing glass with cullet that is less than 25% by weight mixed color cullet, shall not exceed 0.79 lb/ton of glass produced (over a rolling 30 day average). [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 44. Except during periods of startup, shutdown, idling, and during full or partial emission control system bypass episodes, PM10 emissions shall not exceed 0.45 lb/ton of glass produced. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 45. The PM10 emissions, during full or partial emission control system bypass episodes for routine maintenance, shall not exceed 0.71 lb/ton of glass produced. [District Rule 2201] Federally Enforceable Through Title V Permit
- 46. PM emissions from the glass furnace shall not exceed 1 lb of particulate matter per ton of glass produced. [40 CFR 60.293(b)(1)] Federally Enforceable Through Title V Permit
- 47. The emission limits of this permit shall not apply during routine maintenance of the respective add-on control systems. The routine maintenance in each calendar year shall not exceed 144 hours total for all controls and routine maintenance shall be conducted in a manner consistent with good air pollution control practices for minimizing air emissions. Routine maintenance includes, but is not limited to: 1) Calibration and scheduled parts replacement of CEMS equipment per manufacturer's recommendations, 2) Cleaning of particulate control devices and stack ductwork to ensure optimal performance, and 3) Necessary repairs to ensure optimal performance of all parts of the system. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 48. The PM10 emissions shall not exceed 19,006 pounds during the first calendar quarter, 19,178 pounds during the second calendar quarter, 19,351 pounds during the third calendar quarter and 19,351 pounds during the fourth calendar quarter. These limits are to enforce the PM10 emission reductions granted by certificate number N-161-4. [District Rule 2201] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: GALLO GLASS COMPANY

Location: 605 S SANTA CRUZ AVE, MODESTO, CA 95354

- 49. The maximum throughput of lime received and stored in the lime storage silo shared with permit units N-1662-1, N-1662-2, N-1662-3 and N-1662-4 shall not exceed either of the following limits: 65 tons-lime/day or 110 tons-lime/quarter. [District Rule 2201] Federally Enforceable Through Title V Permit
- 50. PM10 emissions rate from the lime storage silo shared with permit units N-1662-1, N-1662-2, N-1662-3 and N-1662-4 shall not exceed 0.0049 lb-PM10/ton-lime stored. [District Rule 2201] Federally Enforceable Through Title V Permit
- 51. The facility shall not use commercial arsenic as a raw material in the production process. [40 CFR Part 61 Subpart N] Federally Enforceable Through Title V Permit
- 52. Each dust collector and bin vent filter shall be maintained and operated in the range that optimizes control efficiency as recommended by the manufacturer. [District Rule 2201] Federally Enforceable Through Title V Permit
- 53. Each dust collector and bin vent filter's cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
- 54. Material removed from each dust collector and bin vent filter shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
- 55. Replacement filters numbering at least 10% of the total number of filters in the largest dust collector, and for each type of filter, shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
- 56. A spare set of bags or filters shall be maintained on the premises at all times for the bin vent filter serving the lime storage silo shared with permit units N-1662-1, N-1662-2, N-1662-3 and N-1662-4. [District Rule 2201] Federally Enforceable Through Title V Permit
- 57. Devices to measure the primary and secondary voltage and current of the electrostatic precipitator shall be maintained in accordance with the manufacturer's specifications. [District Rule 4354, 40 CFR 60.293(d), and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 58. When the electrostatic precipitator is in operation, the specific power of the electrostatic precipitator shall be at least 70 milliwatts/acfm except during the bypass episodes allowed by this permit. [District Rule 2520, §9.3.2, 40 CFR 60.293(d), and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 59. The ceramic filter dust collectors shall each be equipped with a pressure differential gauge to indicate the pressure drop across the filters. The gauges shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rules 2201 and 4354 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 60. During operation of the ceramic filter dust collectors, the pressure differential gauge reading shall be 1 to 20 inches of water column. [District Rules 2201 and 4354 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 61. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7. [40 CFR Part 64] Federally Enforceable Through Title V Permit
- 62. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR Part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
- 63. The permittee shall comply with the record keeping and reporting requirements of 40 CFR Part 64.9. [40 CFR Part 64] Federally Enforceable Through Title V Permit
- 64. When the electrostatic precipitator is in operation, the specific power of the electrostatic precipitator shall be continuously monitored and recorded. [District Rules 2201 and 4354, 40 CFR 60.293(d), and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 65. Dust collector filters shall be inspected annually while in operation for evidence of particulate matter breakthrough and replaced as needed. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 66. Dust collector filters shall be inspected annually while not in operation for tears, scuffs, abrasions or hole that might interfere with the PM collection efficiency and shall be replaced as needed. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit

Location: 605 S SANTA CRUZ AVE, MODESTO, CA 95354

- 67. Permittee shall keep a record of the daily hours of operation, the amount of glass pulled from the furnace (in tons), the NOx emissions (in lb/ton of glass pulled), the SOx emissions (in lb/ton of glass pulled), the weight of mixed color mix cullet used, the total amount of cullet used (by weight) and the ratio of the mixed color cullet weight to the total cullet weight (in percent). [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 68. Permittee shall maintain records of the following: 1) Source tests and source test results, 2) the acceptable range for each approved key system operating parameter, as established during source tests, 3) The operating values of the key system operating parameters at the approved recording frequency, 4) any maintenance and repair, and 5) any malfunctions. [District Rule 4354] Federally Enforceable Through Title V Permit
- 69. The pollutant mass emission rate in lb/hr shall be converted to lb pollutant/ton of glass pulled as specified in Rule 4354. The operator of a oxy-fuel fired furnace, oxygen-assisted combustion furnace, or a furnace utilizing any fuel oxidants other than 100% ambient air, shall submit to the APCO, ARB, and EPA for approval any methodologies and data that will be used to calculate emission rates for NOx, CO, and VOC if the methods are different from those specified in Rule 4354. Unless the operator received prior written approval from APCO, ARB, and EPA of all the calculation methods to be used that are different from those specified in Rule 4354, compliance with the emissions limits cannot be fully demonstrated, and it shall be deemed to be a violation of the rule. [District Rule 4354] Federally Enforceable Through Title V Permit
- 70. The oxygen to fuel ratio shall be continuously monitored and recorded. [District Rule 4354] Federally Enforceable Through Title V Permit
- 71. The permittee shall maintain daily records of the aggregated NOx emissions. [District Rules 2520, 9.3.2 and 4354, 9.6.1 and 9.7] Federally Enforceable Through Title V Permit
- 72. The permittee shall maintain the burner oxygen to fuel ratio records required by this permit. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 73. A record of the PM10 emissions from this unit, in pounds per calendar quarter, shall be kept. [District Rule 2201] Federally Enforceable Through Title V Permit
- 74. A record of the cumulative annual number of hours that the emission control system is either fully or partially bypassed shall be kept. The record shall be updated at least weekly. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 75. The permittee shall keep a record of the cumulative annual hours of operation of the glass furnace on LPG fuel. [District Rule 2201] Federally Enforceable Through Title V Permit
- 76. When the electrostatic precipitator is in operation, the permittee shall maintain daily records of the specific power of the electrostatic precipitator (in milliwatts/acfm). [District Rules 2201, 4354, 40 CFR 60.293(d) and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 77. The operator shall monitor and record the pressure differential gauge reading of each ceramic filter dust collector at least once during each day that the units operate. [District Rules 2201 and 4354 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 78. Records of dust collector and bin vent filter maintenance, inspections and repairs shall be maintained. The records shall include, date of inspection, change outs of filter media, corrective action taken, and identification of the individual performing the inspection. [District Rules 2201 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 79. Records of daily and quarterly amount of lime transferred into the lime storage silo shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
- 80. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 2201 and 4354 and 40 CFR Part 64] Federally Enforceable Through Title V Permit

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: N-1662-4-22 **EXPIRATION DATE:** 06/30/2026

EQUIPMENT DESCRIPTION:

GLASS FURNACE #4 WITH 10 PRAXAIR GAS/OXYGEN BURNERS AND ASSOCIATED FORMING EQUIPMENT (90 MMBTU/HR MAX HEAT CAPACITY). THIS FURNACE IS DUCTED THROUGH A STACK COMMON TO PERMIT UNITS N-1662-1, N-1662-2, N-1662-3 AND N-1662-4. THE FURNACES ARE SERVED BY THE FOLLOWING SHARED EQUIPMENT: SOX SCRUBBER INCLUDING A LIME STORAGE SILO SERVED BY A BIN VENT FILTER. AN ELECTROSTATIC PRECIPITATOR, AND/OR FOUR TRI-MER UCF-500 CERAMIC FILTER DUST COLLECTORS

PERMIT UNIT REQUIREMENTS

- No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
- Particulate matter emissions shall not exceed 0.1 grain/dscf in concentration. [District Rule 4201 and Stanislaus County Rule 404] Federally Enforceable Through Title V Permit
- The furnace shall be fired on natural gas and LPG only. [District Rule 2201] Federally Enforceable Through Title V Permit
- The furnace shall have continuous monitoring systems for NOx and SOx. The monitoring devices shall have continuous recording devices, and all records shall be kept on site. [District Rules 1080 and 4354] Federally Enforceable Through Title V Permit
- One continuous emissions monitoring (CEM) system may be used for monitoring oxy-fuel fired furnaces #1, #2, #3, and #4 provided all of the exhaust gases of each of these furnaces are ducted to a common stack, and monitored down stream of the common stack. The CEMS shall comply with the requirements of 40 Code of Federal Regulations (CFR) Part 51, 40 CFR Parts 60.7 and 60.13, 40 CFR Part 60 Appendix B (Performance Specifications) and Appendix F (Quality Assurance Procedures) and the applicable sections of Rule 1080 (Stack Monitoring). [District Rule 4354, 5.9] and 6.6.1] Federally Enforceable Through Title V Permit
- The facility shall install and maintain equipment, facilities, and systems compatible with the District's CEM data polling software system and shall make CEM data available to the District's automated polling system on a daily basis. [District Rule 1080] Federally Enforceable Through Title V Permit
- The common exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NOx, CO, and O2 analyzer during District inspections. The sampling ports shall be located in accordance with the CARB regulation titled California Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Source Emission Monitoring and Testing. [District Rule 1081] Federally Enforceable Through Title V Permit
- The permittee shall notify the District at least 24 hours prior to initiating idling, shutdown, or startup of the glass furnace and this notification shall include: The date and time of the start of the exempt operation, reason for performing the operation, and an estimated completion date. The permittee shall notify the District within 24 hours after completion of the operation and shall maintain operating records and/or support documentation necessary to claim exemption. [District Rule 4354] Federally Enforceable Through Title V Permit
- The emission control systems shall be in operation whenever conditions are consistent with equipment manufacturer's specifications during startup, idling and shutdown periods. [District Rule 4354] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: GALLO GLASS COMPANY

605 S SANTA CRUZ AVE, MODESTO, CA 95354 Location: N-1662-4-22 : Jan 23 2023 4:34PM -- KAHLONJ

- 10. The duration of a furnace shutdown shall not exceed 20 days, measured from the time furnace operations drop below the idle threshold specified in Section 3.17 of District Rule 4354 to when all emissions from the furnace cease. [District Rule 4354] Federally Enforceable Through Title V Permit
- 11. The oxygen to fuel ratio shall be maintained within the range shown by the most recent source test to result in compliance with the CO and VOC limits of this permit. The acceptable range of the oxygen to fuel ratio shall be established during the initial source test and during each subsequent annual source test. [District Rule 4354] Federally Enforceable Through Title V Permit
- 12. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation E=3.59P^0.62 (P< 30 tph) or E=17.31P^0.16 (P> 30 tph). [District Rule 4202] Federally Enforceable Through Title V Permit
- 13. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [Stanislaus County Rule 407 and District Rule 4801] Federally Enforceable Through Title V Permit
- 14. Source testing to demonstrate compliance with permit conditions and all rules and regulations for both natural gas and LPG shall be conducted within 60 days after the end of the start-up exemption, and at least once every calendar year thereafter. NOx and CO testing shall be performed using CARB Method 100. VOC testing shall be performed using EPA method 25A. PM10 testing shall be performed using EPA methods 201 and 202, EPA methods 201a and 202, or CARB methods 501 and 5. SOx testing shall be performed using EPA Method 8 and CARB Method 1-100. [District Rules 1081; 2520; and 4354] Federally Enforceable Through Title V Permit
- 15. Source testing when firing on LPG fuel need not be performed if the LPG fuel usage for this furnace does not exceed 100 hours during any one calendar year. A source test shall be performed within 90 days after this furnace exceeds 100 hours of operation, on LPG, on an annual basis. [District Rule 1081] Federally Enforceable Through Title V Permit
- 16. Source testing shall be conducted by a CARB-certified source testing contractor. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to source testing. The results of each source test shall be submitted to the District within 60 days after the source test date. [District Rule 1081] Federally Enforceable Through Title V Permit
- 17. Source test conditions shall be representative of operations equal to or greater than 60 percent of capacity for each furnace as stated in the Permit to Operate. [District Rule 4354] Federally Enforceable Through Title V Permit
- 18. For source testing purposes, the arithmetic average of three 30-consecutive-minute test runs shall be used to determine compliance with NOx, CO, VOC, and SOx emission limits. [District Rule 4354] Federally Enforceable Through Title V Permit
- 19. For source testing purposes, the arithmetic average of three 60-consecutive-minute test runs shall be used to determine compliance with PM10 emission limits. [District Rule 4354] Federally Enforceable Through Title V Permit
- 20. For source testing purposes, if two of the three runs individually demonstrate emissions above the applicable limit, the test cannot be used to demonstrate compliance for the furnace, even if the averaged emissions of all three test runs is less than the applicable limit. [District Rule 4354] Federally Enforceable Through Title V Permit
- 21. PM and PM10 source testing shall be conducted downstream of the electrostatic precipitator and the ceramic filter dust collector in the common stack. Furnaces #1, #2, #3, and #4 must operate simultaneously during source testing unless prior approval is obtained from the District. [District Rule 1081] Federally Enforceable Through Title V Permit
- 22. An annual Relative Accuracy Test Audit (RATA) shall be performed on the continuous monitoring system as outlined in 40 CFR Part 60 Appendix B. [District Rule 1080] Federally Enforceable Through Title V Permit

- 23. The owner/operator shall perform a relative accuracy test audit (RATA) as specified by 40 CFR Part 60, Appendix F (CGAs and RATAs) and if applicable 40 CFR Part 75, Appendix B (linearity and RATAs) at least once every four calendar quarters and annually within 30 days of the anniversary date of the initial test. The permittee shall comply with the applicable requirements for quality assurance testing and maintenance of the continuous emission monitor equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F. [District Rule 1080] Federally Enforceable Through Title V Permit
- 24. An exceedance of a NOx or SOx emission limit as indicated by the CEMS shall be reported by the operator to the APCO within 24 hours. The notification shall include 1) name and location of the facility, 2) identification of furnace(s) causing the exceedances, 3) calculation of actual NOx, CO and VOC emissions, and 4) corrective actions and schedules to complete the work. [District Rule 1080 and Stanislaus County Rule 108] Federally Enforceable Through Title V Permit
- 25. The owner or operator shall, upon written notice from the APCO, provide a summary of the data obtained from the CEM systems. This summary of data shall be in the form and the manner prescribed by the APCO. [District Rule 1080, 7.1] Federally Enforceable Through Title V Permit
- 26. Records shall be maintained and shall include: the occurrence and duration of any start-up, shutdown or malfunction, performance testing, evaluations, calibrations, checks, adjustments, any periods during which a continuous monitoring system or monitoring device is inoperative, maintenance of any CEMS that have been installed pursuant to District Rule 1080, and emission measurements. [District Rule 1080] Federally Enforceable Through Title V Permit
- 27. The operator shall notify the APCO no later than one hour after the detection of a breakdown of the CEMS. The operator shall inform the APCO of the intent to shut down the CEMS at least 24 hours prior to the event. [District Rule 1100] Federally Enforceable Through Title V Permit
- 28. The permittee shall submit a written report including copies of any Equipment Breakdown reports and/or pertinent variance decisions to the APCO for each calendar quarter, within 30 days of the end of the quarter, including: time intervals, data and magnitude of excess emissions, nature and cause of excess emissions (if known), corrective actions taken and preventive measures adopted; averaging period used for data reporting shall correspond to the averaging period for each respective emission standard; applicable time and date of each period during which the CEM was inoperative (except for zero and span checks) and the nature of system repairs and adjustments; and a negative declaration when no excess emissions occurred. [District Rule 1080] Federally Enforceable Through Title V Permit
- 29. Upon notice by the District that the facility's CEM system is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the CEM data is sent to the District by a District-approved alternative method. [District Rule 1080] Federally Enforceable Through Title V Permit
- 30. Results of continuous emissions monitoring shall be reduced according to the procedure established in 40 CFR, Part 51, Appendix P, paragraphs 5.0 through 5.3.3, or by other methods deemed equivalent by mutual agreement with the District, the ARB, and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit
- 31. Cylinder gas audits (CGAs) of continuous emission monitors shall be conducted quarterly, except during quarters in which relative accuracy and total accuracy testing is performed, in accordance with EPA guidelines. The District shall be notified prior to completion of the audits. Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rule 1080] Federally Enforceable Through Title V Permit
- 32. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4201, Stanislaus County Rule 404, District Rule 4202 and Stanislaus County Rule 405. A permit shield is granted from these requirements. [District Rule 2520] Federally Enforceable Through Title V Permit
- 33. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4801 and Stanislaus County Rule 407. A permit shield is granted from these requirements. [District Rule 2520] Federally Enforceable Through Title V Permit
- 34. The requirements of District Rule 4301 and Stanislaus County Rule 408 were determined to not apply to this unit because the unit does not utilize indirect heat transfer. A permit shield is granted from these requirements. [District Rule 2520] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
These terms and conditions are part of the Facility-wide Permit to Operate.

Facility Name: GALLO GLASS COMPANY

Location: 605 S SANTA CRUZ AVE, MODESTO, CA 95354

- 35. The requirements of 40 CFR Part 61, Subpart N were determined to not apply to this unit because the unit does not use commercial arsenic. A permit shield is granted from these requirements. [District Rule 2520] Federally Enforceable Through Title V Permit
- 36. Any glass melting furnace located at an Area Source of hazardous air pollutants shall comply with 40 CFR Part 63 Subpart SSSSSS (National Emission Standards for Hazardous Air Pollutants for Glass Manufacturing Area Sources). [40 CFR Part 63 Subpart SSSSSS] Federally Enforceable Through Title V Permit
- 37. The amount of glass produced shall not exceed 637.9 tons during any one day. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 38. Except during periods of startup, shutdown, and idling, NOx emissions shall not exceed 1.3 pounds per ton of glass produced (over a rolling 30-day average). This performance based limit is to enforce the NOx emission reductions granted by certificate number N-107-2. Any CEM measurement greater than 1.3 lb-NOx/ton of glass produced for each 30-day rolling average constitutes a violation of this emission limit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 39. Except during periods of startup, shutdown, and idling, CO emissions shall not exceed 0.20 pounds per ton of glass produced. [District Rule 2201] Federally Enforceable Through Title V Permit
- 40. Except during periods of startup, shutdown, and idling, VOC emissions shall not exceed 0.02 pounds per ton of glass produced. [District Rule 2201] Federally Enforceable Through Title V Permit
- 41. Except during periods of startup, shutdown, and idling, the combined SOx emissions from permit units N-1662-1, N-1662-2, N-1662-3 and N-1662-4, while producing glass with cullet that is equal to or greater than 25% by weight mixed color cullet, shall not exceed 0.95 lb/ton of glass produced (over a rolling 30 day average). [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 42. Except during periods of startup, shutdown, and idling, the combined SOx emissions from permit units N-1662-1, N-1662-2, N-1662-3 and N-1662-4, while producing glass with cullet that is less than 25% by weight mixed color cullet, shall not exceed 0.79 lb/ton of glass produced (over a rolling 30 day average). [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 43. Except during periods of startup, shutdown, idling, and during full or partial emission control system bypass episodes, PM10 emissions shall not exceed 0.45 lb/ton of glass produced. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 44. The PM10 emissions, during full or partial emission control system bypass episodes for routine maintenance, shall not exceed 0.71 lb/ton of glass produced. [District Rule 2201] Federally Enforceable Through Title V Permit
- 45. PM emissions from the glass furnace shall not exceed 1 lb of particulate matter per ton of glass produced. [40 CFR 60.293(b)(1)] Federally Enforceable Through Title V Permit
- 46. The emission limits of this permit shall not apply during routine maintenance of the respective add-on control systems. The routine maintenance in each calendar year shall not exceed 144 hours total for all controls and routine maintenance shall be conducted in a manner consistent with good air pollution control practices for minimizing air emissions. Routine maintenance includes, but is not limited to: 1) Calibration and scheduled parts replacement of CEMS equipment per manufacturer's recommendations, 2) Cleaning of particulate control devices and stack ductwork to ensure optimal performance, and 3) Necessary repairs to ensure optimal performance of all parts of the system. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 47. The facility shall not use commercial arsenic as a raw material in the production process. [40 CFR Part 61 Subpart N] Federally Enforceable Through Title V Permit
- 48. During furnace idling, NOx emissions shall not exceed 956.9 pounds in any one day. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 49. During furnace idling, CO emissions shall not exceed 637.9 pounds in any one day. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit

- 50. During furnace idling, VOC emissions shall not exceed 12.8 pounds in any one day. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 51. During furnace idling, SOx emissions shall not exceed 701.7 pounds in any one day when producing glass with cullet that is equal to or greater than 25% by weight mixed color cullet. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 52. During furnace idling, SOx emissions shall not exceed 574.1 pounds in any one day when producing glass with cullet that is less than 25% by weight mixed color cullet. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 53. During furnace idling, PM10 emissions shall not exceed 319.0 pounds in any one day. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 54. The PM10 emissions shall not exceed 28,132 pounds during the first calendar quarter, 28,445 pounds during the second calendar quarter, 28,757 pounds during the third calendar quarter and 28,758 pounds during the fourth calendar quarter. These limits are to enforce the PM10 emission reductions granted by certificate number N-161-4. [District Rule 2201] Federally Enforceable Through Title V Permit
- 55. The maximum throughput of lime received and stored in the lime storage silo shared with permit units N-1662-1, N-1662-2, N-1662-3 and N-1662-4 shall not exceed either of the following limits: 65 tons-lime/day or 110 tons-lime/quarter. [District Rule 2201] Federally Enforceable Through Title V Permit
- 56. PM10 emissions rate from the lime storage silo shared with permit units N-1662-1, N-1662-2, N-1662-3 and N-1662-4 shall not exceed 0.0049 lb-PM10/ton-lime stored. [District Rule 2201] Federally Enforceable Through Title V Permit
- 57. Each dust collector and bin vent filter shall be maintained and operated in the range that optimizes control efficiency as recommended by the manufacturer. [District Rule 2201] Federally Enforceable Through Title V Permit
- 58. Each dust collector and bin vent filter's cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
- 59. Material removed from each dust collector and bin vent filter shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit
- 60. Replacement filters numbering at least 10% of the total number of filters in the largest dust collector, and for each type of filter, shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
- 61. A spare set of bags or filters shall be maintained on the premises at all times for the bin vent filter serving the lime storage silo shared with permit units N-1662-1, N-1662-2, N-1662-3 and N-1662-4. [District Rule 2201] Federally Enforceable Through Title V Permit
- 62. Devices to measure the primary and secondary voltage and current of the electrostatic precipitator shall be maintained in accordance with the manufacturer's specifications. [District Rule 4354, 40 CFR 60.293(d), and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 63. When the electrostatic precipitator is in operation, the specific power of the electrostatic precipitator shall be at least 70 milliwatts/acfm except during the bypass episodes allowed by this permit. [District Rule 2520, §9.3.2, 40 CFR 60.293(d), and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 64. The ceramic filter dust collectors shall each be equipped with a pressure differential gauge to indicate the pressure drop across the filters. The gauges shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rules 2201 and 4354 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 65. During operation of the ceramic filter dust collectors, the pressure differential gauge reading shall be 1 to 20 inches of water column. [District Rules 2201 and 4354 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 66. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7. [40 CFR Part 64] Federally Enforceable Through Title V Permit

- 67. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR Part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
- 68. The permittee shall comply with the record keeping and reporting requirements of 40 CFR Part 64.9. [40 CFR Part 64] Federally Enforceable Through Title V Permit
- 69. When the electrostatic precipitator is in operation, the specific power of the electrostatic precipitator shall be continuously monitored and recorded. [District Rules 2201 and 4354, 40 CFR 60.293(d), and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 70. Dust collector filters shall be inspected annually while in operation for evidence of particulate matter breakthrough and replaced as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
- 71. Dust collector filters shall be inspected annually while not in operation for tears, scuffs, abrasions or hole that might interfere with the PM collection efficiency and shall be replaced as needed. [District Rule 2520] Federally Enforceable Through Title V Permit
- 72. Permittee shall keep a record of the daily hours of operation, the amount of glass pulled from the furnace (in tons), the NOx emissions (in lb/ton of glass pulled), the SOx emissions (in lb/ton of glass pulled), the weight of mixed color mix cullet used, the total amount of cullet used (by weight) and the ratio of the mixed color cullet weight to the total cullet weight (in percent). [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 73. Permittee shall maintain records of the following: 1) Source tests and source test results, 2) the acceptable range for each approved key system operating parameter, as established during source tests, 3) The operating values of the key system operating parameters at the approved recording frequency, 4) any maintenance and repair, and 5) any malfunctions. [District Rule 4354] Federally Enforceable Through Title V Permit
- 74. The pollutant mass emission rate in lb/hr shall be converted to lb pollutant/ton of glass pulled as specified in Rule 4354. The operator of a oxy-fuel fired furnace, oxygen-assisted combustion furnace, or a furnace utilizing any fuel oxidants other than 100% ambient air, shall submit to the APCO, ARB, and EPA for approval any methodologies and data that will be used to calculate emission rates for NOx, CO, and VOC if the methods are different from those specified in Rule 4354. Unless the operator received prior written approval from APCO, ARB, and EPA of all the calculation methods to be used that are different from those specified in Rule 4354, compliance with the emissions limits cannot be fully demonstrated, and it shall be deemed to be a violation of the rule. [District Rule 4354] Federally Enforceable Through Title V Permit
- 75. The oxygen to fuel ratio shall be continuously monitored and recorded. [District Rule 4354] Federally Enforceable Through Title V Permit
- 76. The permittee shall maintain daily records of the aggregated NOx emissions. [District Rules 2520 and 4354] Federally Enforceable Through Title V Permit
- 77. The permittee shall maintain the burner oxygen to fuel ratio records required by this permit. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 78. A record of the PM10 emissions from this unit, in pounds per calendar quarter, shall be kept. [District Rule 2201] Federally Enforceable Through Title V Permit
- 79. A record of the cumulative annual number of hours that the emission control system is either fully or partially bypassed shall be kept. The record shall be updated at least weekly. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 80. The permittee shall keep a record of the cumulative annual hours of operation of the glass furnace on LPG fuel. [District Rule 1070] Federally Enforceable Through Title V Permit
- 81. When the electrostatic precipitator is in operation, the permittee shall maintain daily records of the specific power of the electrostatic precipitator (in milliwatts/acfm). [District Rules 2201, 4354, 40 CFR 60.293(d) and 40 CFR Part 64] Federally Enforceable Through Title V Permit

- 82. The operator shall monitor and record the pressure differential gauge reading of each ceramic filter dust collector at least once during each day that the units operate. [District Rules 2201 and 4354 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 83. Records of dust collector and bin vent filter maintenance, inspections and repairs shall be maintained. The records shall include, date of inspection, change outs of filter media, corrective action taken, and identification of the individual performing the inspection. [District Rules 2201 and 2520] Federally Enforceable Through Title V Permit
- 84. Records of daily and quarterly amount of lime transferred into the lime storage silo shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
- 85. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 2201 and 4354 and 40 CFR Part 64] Federally Enforceable Through Title V Permit

APPENDIX C Previously issued ATC N-1662-1-21





AUTHORITY TO CONSTRUCT

PERMIT NO: N-1662-1-21 **ISSUANCE DATE:** 08/26/2021

LEGAL OWNER OR OPERATOR: GALLO GLASS COMPANY

MAILING ADDRESS: ATTN: ENVIRO HEALTH & SAFETY MANAGER

PO BOX 1230

MODESTO, CA 95353

LOCATION: 605 S SANTA CRUZ AVE

MODESTO, CA 95354

EQUIPMENT DESCRIPTION:

MODIFICATION OF GLASS FURNACE #1 WITH 10 MAXON GAS/OXYGEN BURNERS (75 MMBTU/HR MAX HEAT CAPACITY), AND ASSOCIATED FORMING EQUIPMENT INCLUDING FOREHEARTHS, COATING, AND CHAIN BURNERS. THIS FURNACE IS DUCTED THROUGH A STACK COMMON TO PERMIT UNITS N-1662-1, N-1662-2, N-1662-3 AND N-1662-4. THE FURNACES ARE SERVED BY THE FOLLOWING SHARED EQUIPMENT: SOX SCRUBBER INCLUDING A LIME STORAGE SILO SERVED BY A BIN VENT FILTER, AN ELECTROSTATIC PRECIPITATOR, AND/OR FOUR TRI-MER UCF-500 CERAMIC FILTER DUST COLLECTORS: REBRICK THE FURNACE AND REPLACE THE BURNERS WITH EIGHT 10 MMBTU/HR (EACH), TWO 5 MMBTU/HR (EACH), TWO 2 MMBTU/HR (EACH) BURNER FOR A TOTAL HEAT INPUT RATE OF 94 MMBTU/HR

CONDITIONS

- 1. This Authority to Construct serves as a written certificate of conformity with the procedural requirements of 40 CFR 70.7 and 70.8 and with the compliance requirements of 40 CFR 70.6(c). [District Rule 2201] Federally Enforceable Through Title V Permit
- 2. Prior to operating with modifications authorized by this Authority to Construct, the facility shall submit an application to modify the Title V permit with an administrative amendment in accordance with District Rule 2520 Section 5.3.4. [District Rule 2520, 5.3.4] Federally Enforceable Through Title V Permit
- 3. Authority to Construct (ATC) N-1662-1-19 shall be implemented concurrently, or prior to the modification and startup of the equipment authorized by this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit
- 4. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (209) 557-6400 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Samir Sheikh, Executive Director / APCO

Brian Clements, Director of Permit Services
N-1662-1-21: Aug 26 2021 2-27PM - GARCIAJ : Joint Inspection NOT Required

- 5. Particulate matter emissions shall not exceed 0.1 grain/dscf in concentration. [District Rule 4201 and Stanislaus County Rule 404] Federally Enforceable Through Title V Permit
- 6. The furnace shall be fired on natural gas and LPG only. [District Rule 2201] Federally Enforceable Through Title V Permit
- 7. The furnace shall have continuous monitoring systems for NOx and SOx. The monitoring devices shall have continuous recording devices, and all records shall be kept on site. [District Rules 1080 and 4354, §5.9] Federally Enforceable Through Title V Permit
- 8. One continuous emissions monitoring (CEM) system may be used for monitoring oxy-fuel fired furnaces #1, #2, #3, and #4 provided all of the exhaust gases of each of these furnaces are ducted to a common stack, and monitored down stream of the common stack. The CEMS shall comply with the requirements of 40 Code of Federal Regulations (CFR) Part 51, 40 CFR Parts 60.7 and 60.13, 40 CFR Part 60 Appendix B (Performance Specifications) and Appendix F (Quality Assurance Procedures) and the applicable sections of Rule 1080 (Stack Monitoring). [District Rule 4354, 5.9 and 6.6.1] Federally Enforceable Through Title V Permit
- 9. The facility shall install and maintain equipment, facilities, and systems compatible with the District's CEM data polling software system and shall make CEM data available to the District's automated polling system on a daily basis. [District Rule 1080] Federally Enforceable Through Title V Permit
- 10. The common exhaust stack shall be equipped with permanent provisions to allow collection of stack gas samples consistent with EPA test methods and shall be equipped with safe permanent provisions to sample stack gases with a portable NOx, CO, and O2 analyzer during District inspections. The sampling ports shall be located in accordance with the CARB regulation titled California Air Resources Board Air Monitoring Quality Assurance Volume VI, Standard Operating Procedures for Stationary Source Emission Monitoring and Testing. [District Rule 1081] Federally Enforceable Through Title V Permit
- 11. The permittee shall notify the District at least 24 hours prior to initiating idling, shutdown, or startup of the glass furnace and this notification shall include: The date and time of the start of the exempt operation, reason for performing the operation, and an estimated completion date. The permittee shall notify the District within 24 hours after completion of the operation and shall maintain operating records and/or support documentation necessary to claim exemption. [District Rule 4354] Federally Enforceable Through Title V Permit
- 12. The emission control systems shall be in operation whenever conditions are consistent with equipment manufacturer's specifications during startup, idling and shutdown periods. [District Rule 4354] Federally Enforceable Through Title V Permit
- 13. The duration of a furnace shutdown shall not exceed 20 days, measured from the time furnace operations drop below the idle threshold specified in Section 3.17 of District Rule 4354 to when all emissions from the furnace cease. [District Rule 4354] Federally Enforceable Through Title V Permit
- 14. NOx, CO, VOC, SOx, and PM10 emissions during idling shall not exceed the amount as calculated using the following equation: NOx, CO, VOC, SOx, or PM10 (lb/day) = Applicable emission limit (lb/ton) x Furnace permitted production capacity (tons/day). [District Rule 4354] Federally Enforceable Through Title V Permit
- 15. The oxygen to fuel ratio shall be maintained within the range shown by the most recent source test to result in compliance with the CO and VOC limits of this permit. The acceptable range of the oxygen to fuel ratio shall be established during the initial source test and during each subsequent annual source test. [District Rule 4354] Federally Enforceable Through Title V Permit
- 16. Particulate matter emissions shall not exceed the hourly rate as calculated in District Rule 4202 using the equation E=3.59P^0.62 (P<30 tph) or E=17.31P^0.16 (P>30 tph). [District Rule 4202] Federally Enforceable Through Title V Permit
- 17. Sulfur compound emissions shall not exceed 0.2% by volume, 2000 ppmv, on a dry basis averaged over 15 consecutive minutes. [Stanislaus County Rule 407 and District Rule 4801] Federally Enforceable Through Title V Permit

- 18. Source testing to demonstrate compliance with permit conditions and all rules and regulations for both natural gas and LPG shall be conducted within 60 days after the end of the start-up exemption, and at least once every calendar year thereafter. NOx and CO testing shall be performed using CARB Method 100. VOC testing shall be performed using EPA method 25A. SOx testing shall be performed using EPA Method 8 or CARB Method 100. PM10 testing shall be performed using EPA methods 201 and 202, EPA methods 201a and 202, or CARB methods 501 and 5. In lieu of performing a source test for PM10, the results of CARB Method 5 or EPA Methods 5 and 202 may be used for compliance with the PM10 emissions limit. If this option is used, then all of the particulate emissions will be considered to be PM10. Alternative test methods as approved by EPA, ARB, and the District may also be used to address the source testing requirements of this permit. [District Rules 1081, 2201, 2520, §9.3.2; and 4354, 6.4 and 6.5] Federally Enforceable Through Title V Permit
- 19. Source testing when firing on LPG fuel need not be performed if the LPG fuel usage for this furnace does not exceed 100 hours during any one calendar year. A source test shall be performed within 90 days after this furnace exceeds 100 hours of operation, on LPG, on an annual basis. [District Rule 1081] Federally Enforceable Through Title V Permit
- 20. Source testing shall be conducted by a CARB-certified source testing contractor. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval at least 15 days prior to source testing. The results of each source test shall be submitted to the District within 60 days after the source test date. [District Rule 1081] Federally Enforceable Through Title V Permit
- 21. Source test conditions shall be representative of operations equal to or greater than 60 percent of capacity for each furnace as stated in the Permit to Operate. [District Rule 4354, §6.4.2] Federally Enforceable Through Title V Permit
- 22. For source testing purposes, the arithmetic average of three 30-consecutive-minute test runs shall be used to determine compliance with NOx, CO, VOC, and SOx emission limits. [District Rule 4354] Federally Enforceable Through Title V Permit
- 23. For source testing purposes, the arithmetic average of three 60-consecutive-minute test runs shall be used to determine compliance with PM10 emission limits. [District Rule 4354] Federally Enforceable Through Title V Permit
- 24. For source testing purposes, if two of the three runs individually demonstrate emissions above the applicable limit, the test cannot be used to demonstrate compliance for the furnace, even if the averaged emissions of all three test runs is less than the applicable limit. [District Rule 4354] Federally Enforceable Through Title V Permit
- 25. PM and PM10 source testing shall be conducted downstream of the electrostatic precipitator and the ceramic filter dust collector in the common stack. Furnaces #1, #2, #3, and #4 must operate simultaneously during source testing unless prior approval is obtained from the District. [District Rule 1081] Federally Enforceable Through Title V Permit
- 26. An annual Relative Accuracy Test Audit (RATA) shall be performed on the continuous monitoring system as outlined in 40 CFR Part 60 Appendix B. [District Rule 1080] Federally Enforceable Through Title V Permit
- 27. The owner/operator shall perform a relative accuracy test audit (RATA) as specified by 40 CFR Part 60, Appendix F (CGAs and RATAs) and if applicable 40 CFR Part 75, Appendix B (linearity and RATAs) at least once every four calendar quarters and annually within 30 days of the anniversary date of the initial test. The permittee shall comply with the applicable requirements for quality assurance testing and maintenance of the continuous emission monitor equipment in accordance with the procedures and guidance specified in 40 CFR Part 60, Appendix F. [District Rule 1080] Federally Enforceable Through Title V Permit
- 28. An exceedance of a NOx or SOx emission limit as indicated by the CEMS shall be reported by the operator to the APCO within 24 hours. The notification shall include 1) name and location of the facility, 2) identification of furnace(s) causing the exceedances, 3) calculation of actual NOx, CO and VOC emissions, and 4) corrective actions and schedules to complete the work. [District Rule 1080 and Stanislaus County Rule 1080] Federally Enforceable Through Title V Permit
- 29. The owner or operator shall, upon written notice from the APCO, provide a summary of the data obtained from the CEM systems. This summary of data shall be in the form and the manner prescribed by the APCO. [District Rule 1080, 7.1] Federally Enforceable Through Title V Permit

- 30. Records shall be maintained and shall include: the occurrence and duration of any start-up, shutdown or malfunction, performance testing, evaluations, calibrations, checks, adjustments, any periods during which a continuous monitoring system or monitoring device is inoperative, maintenance of any CEMS that have been installed pursuant to District Rule 1080, and emission measurements. [District Rule 1080] Federally Enforceable Through Title V Permit
- 31. The operator shall notify the APCO no later than one hour after the detection of a breakdown of the CEMS. The operator shall inform the APCO of the intent to shut down the CEMS at least 24 hours prior to the event. [District Rule 1100] Federally Enforceable Through Title V Permit
- 32. The permittee shall submit a written report including copies of any Equipment Breakdown reports and/or pertinent variance decisions to the APCO for each calendar quarter, within 30 days of the end of the quarter, including: time intervals, data and magnitude of excess emissions, nature and cause of excess emissions (if known), corrective actions taken and preventive measures adopted; averaging period used for data reporting shall correspond to the averaging period for each respective emission standard; applicable time and date of each period during which the CEM was inoperative (except for zero and span checks) and the nature of system repairs and adjustments; and a negative declaration when no excess emissions occurred. [District Rule 1080] Federally Enforceable Through Title V Permit
- 33. Upon notice by the District that the facility's CEM system is not providing polling data, the facility may continue to operate without providing automated data for a maximum of 30 days per calendar year provided the CEM data is sent to the District by a District-approved alternative method. [District Rule 1080] Federally Enforceable Through Title V Permit
- 34. Results of continuous emissions monitoring shall be reduced according to the procedure established in 40 CFR, Part 51, Appendix P, paragraphs 5.0 through 5.3.3, or by other methods deemed equivalent by mutual agreement with the District, the ARB, and the EPA. [District Rule 1080] Federally Enforceable Through Title V Permit
- 35. Cylinder gas audits (CGAs) of continuous emission monitors shall be conducted quarterly, except during quarters in which relative accuracy and total accuracy testing is performed, in accordance with EPA guidelines. The District shall be notified prior to completion of the audits. Audit reports shall be submitted along with quarterly compliance reports to the District. [District Rule 1080] Federally Enforceable Through Title V Permit
- 36. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4201, Stanislaus County Rule 404, District Rule 4202 and Stanislaus County Rule 405. A permit shield is granted from these requirements. [District Rule 2520, §13.2] Federally Enforceable Through Title V Permit
- 37. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4801 and Stanislaus County Rule 407. A permit shield is granted from these requirements. [District Rule 2520, §13.2] Federally Enforceable Through Title V Permit
- 38. The requirements of District Rule 4301 and Stanislaus County Rule 408 were determined to not apply to this unit because the unit does not utilize indirect heat transfer. A permit shield is granted from these requirements. [District Rule 2520, §13.2] Federally Enforceable Through Title V Permit
- 39. The requirements of 40 CFR Part 60 Subpart CC were determined not to apply to this unit because the unit was constructed prior to the effective date in the regulation and has not been modified (according to the definition of "modified in the regulation"). A permit shield is granted from these requirements. [District Rule 2520 Section 13.2] Federally Enforceable Through Title V Permit
- 40. The requirements of 40 CFR Part 61, Subpart N were determined to not apply to this unit because the unit does not use commercial arsenic. A permit shield is granted from these requirements. [District Rule 2520, §13.2] Federally Enforceable Through Title V Permit
- 41. Any glass melting furnace located at an Area Source of hazardous air pollutants shall comply with 40 CFR Part 63 Subpart SSSSSS (National Emission Standards for Hazardous Air Pollutants for Glass Manufacturing Area Sources). [40 CFR Part 63 Subpart SSSSSS] Federally Enforceable Through Title V Permit
- 42. The quantity of glass produced shall not exceed 520.1 tons during any one day. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit

- 43. Except during periods of startup, shutdown, and idling, NOx emissions shall not exceed 1.3 pounds per ton of glass produced (over a rolling 30-day average). This performance based limit is to enforce the NOx emission reductions granted by certificate number N-106-2. Any CEM measurement greater than 1.3 lb-NOx/ton of glass produced for each 30-day rolling average constitutes a violation of this emission limit. [District Rule 2201] Federally Enforceable Through Title V Permit
- 44. Except during periods of startup, shutdown, and idling, CO emissions shall not exceed 0.04 pounds per ton of glass produced. This performance based limit is to enforce the CO emission reductions granted by certificate number N-106-3. [District Rule 2201] Federally Enforceable Through Title V Permit
- 45. Except during periods of startup, shutdown, and idling, VOC emissions shall not exceed 0.02 pounds per ton of glass produced. [District Rule 2201] Federally Enforceable Through Title V Permit
- 46. Except during periods of startup, shutdown, and idling, the combined SOx emissions from permit units N-1662-1, N-1662-2, N-1662-3 and N-1662-4, while producing glass with cullet that is equal to or greater than 25% by weight mixed color cullet, shall not exceed 0.95 lb/ton of glass produced (over a rolling 30 day average). [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 47. Except during periods of startup, shutdown, and idling, the combined SOx emissions from permit units N-1662-1, N-1662-2, N-1662-3 and N-1662-4, while producing glass with cullet that is less than 25% by weight mixed color cullet, shall not exceed 0.79 lb/ton of glass produced (over a rolling 30 day average). [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 48. Except during periods of startup, shutdown, idling, and during full or partial emission control system bypass episodes, PM10 emissions shall not exceed 0.45 lb/ton of glass produced. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 49. The PM10 emissions, during full or partial emission control system bypass episodes for routine maintenance, shall not exceed 0.71 lb/ton of glass produced. [District Rule 2201] Federally Enforceable Through Title V Permit
- 50. The emission limits of this permit shall not apply during routine maintenance of the respective add-on control systems. The routine maintenance in each calendar year shall not exceed 144 hours total for all controls and routine maintenance shall be conducted in a manner consistent with good air pollution control practices for minimizing air emissions. Routine maintenance includes, but is not limited to: 1) Calibration and scheduled parts replacement of CEMS equipment per manufacturer's recommendations, 2) Cleaning of particulate control devices and stack ductwork to ensure optimal performance, and 3) Necessary repairs to ensure optimal performance of all parts of the system. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 51. The PM10 emissions shall not exceed 22,936 pounds during the first calendar quarter, 23,190 pounds during the second calendar quarter, 23,445 pounds during the third calendar quarter and 23,445 pounds during the fourth calendar quarter. These limits are to enforce the PM10 emission reductions granted by certificate number N-161-4. [District Rule 2201] Federally Enforceable Through Title V Permit
- 52. The maximum throughput of lime received and stored in the lime storage silo shared with permit units N-1662-1, N-1662-2, N-1662-3 and N-1662-4 shall not exceed either of the following limits: 65 tons-lime/day or 110 tons-lime/quarter. [District Rule 2201] Federally Enforceable Through Title V Permit
- 53. PM10 emissions rate from the lime storage silo shared with permit units N-1662-1, N-1662-3, N-1662-3 and N-1662-4 shall not exceed 0.0049 lb-PM10/ton-lime stored. [District Rule 2201] Federally Enforceable Through Title V Permit
- 54. The facility shall not use commercial arsenic as a raw material in the production process. [40 CFR Part 61 Subpart N] Federally Enforceable Through Title V Permit
- 55. Each dust collector and bin vent filter shall be maintained and operated in the range that optimizes control efficiency as recommended by the manufacturer. [District Rule 2201] Federally Enforceable Through Title V Permit
- 56. Each dust collector and bin vent filter's cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 2201] Federally Enforceable Through Title V Permit
- 57. Material removed from each dust collector and bin vent filter shall be disposed of in a manner preventing entrainment into the atmosphere. [District Rule 2201] Federally Enforceable Through Title V Permit

- 58. Replacement filters numbering at least 10% of the total number of filters in the largest dust collector, and for each type of filter, shall be maintained on the premises. [District Rule 2201] Federally Enforceable Through Title V Permit
- 59. A spare set of bags or filters shall be maintained on the premises at all times for the bin vent filter serving the lime storage silo shared with permit units N-1662-1, N-1662-2, N-1662-3 and N-1662-4. [District Rule 2201] Federally Enforceable Through Title V Permit
- 60. Devices to measure the primary and secondary voltage and current of the electrostatic precipitator shall be maintained in accordance with the manufacturer's specifications. [District Rule 4354 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 61. When the electrostatic precipitator is in operation, the specific power of the electrostatic precipitator shall be at least 70 milliwatts/acfm except during the bypass episodes allowed by this permit. [District Rule 2520 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 62. The ceramic filter dust collectors shall each be equipped with a pressure differential gauge to indicate the pressure drop across the filters. The gauges shall be maintained in good working condition at all times and shall be located in an easily accessible location. [District Rules 2201 and 4354 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 63. During operation of the ceramic filter dust collectors, the pressure differential gauge reading shall be 1 to 20 inches of water column. [District Rules 2201 and 4354 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 64. The permittee shall comply with the compliance assurance monitoring operation and maintenance requirements of 40 CFR Part 64.7. [40 CFR Part 64] Federally Enforceable Through Title V Permit
- 65. If the District or EPA determine that a Quality Improvement Plan is required under 40 CFR Part 64.7(d)(2), the permittee shall develop and implement the Quality Improvement Plan in accordance with 40 CFR Part 64.8. [40 CFR Part 64] Federally Enforceable Through Title V Permit
- 66. The permittee shall comply with the record keeping and reporting requirements of 40 CFR Part 64.9. [40 CFR Part 64] Federally Enforceable Through Title V Permit
- 67. When the electrostatic precipitator is in operation, the specific power of the electrostatic precipitator shall be continuously monitored and recorded. [District Rules 2201 and 4354, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 68. Dust collector filters shall be inspected annually while in operation for evidence of particulate matter breakthrough and replaced as needed. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 69. Dust collector filters shall be inspected annually while not in operation for tears, scuffs, abrasions or hole that might interfere with the PM collection efficiency and shall be replaced as needed. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 70. Permittee shall keep a record of the daily hours of operation, the amount of glass pulled from the furnace (in tons), the NOx emissions (in lb/ton of glass pulled), the SOx emissions (in lb/ton of glass pulled), the weight of mixed color mix cullet used, the total amount of cullet used (by weight) and the ratio of the mixed color cullet weight to the total cullet weight (in percent). [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 71. Permittee shall maintain records of the following: 1) Source tests and source test results, 2) the acceptable range for each approved key system operating parameter, as established during source tests, 3) The operating values of the key system operating parameters at the approved recording frequency, 4) any maintenance and repair, and 5) any malfunctions. [District Rule 4354] Federally Enforceable Through Title V Permit
- 72. The pollutant mass emission rate in lb/hr shall be converted to lb pollutant/ton of glass pulled as specified in Rule 4354. The operator of a oxy-fuel fired furnace, oxygen-assisted combustion furnace, or a furnace utilizing any fuel oxidants other than 100% ambient air, shall submit to the APCO, ARB, and EPA for approval any methodologies and data that will be used to calculate emission rates for NOx, CO, and VOC if the methods are different from those specified in Rule 4354. Unless the operator received prior written approval from APCO, ARB, and EPA of all the calculation methods to be used that are different from those specified in Rule 4354, compliance with the emissions limits cannot be fully demonstrated, and it shall be deemed to be a violation of the rule. [District Rule 4354] Federally Enforceable Through Title V Permit

- 73. The oxygen to fuel ratio shall be continuously monitored and recorded. [District Rule 4354] Federally Enforceable Through Title V Permit
- 74. The permittee shall maintain daily records of the aggregated NOx emissions. [District Rules 2520, 9.3.2 and 4354, 9.6.1 and 9.7] Federally Enforceable Through Title V Permit
- 75. The permittee shall maintain the burner oxygen to fuel ratio records required by this permit. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 76. A record of the PM10 emissions from this unit, in pounds per calendar quarter, shall be kept. [District Rule 2201] Federally Enforceable Through Title V Permit
- 77. A record of the cumulative annual number of hours that the emission control system is either fully or partially bypassed shall be kept. The record shall be updated at least weekly. [District Rules 2201 and 4354] Federally Enforceable Through Title V Permit
- 78. The permittee shall keep a record of the cumulative annual hours of operation of the glass furnace on LPG fuel. [District Rule 2201] Federally Enforceable Through Title V Permit
- 79. When the electrostatic precipitator is in operation, the permittee shall maintain daily records of the specific power of the electrostatic precipitator (in milliwatts/acfm). [District Rules 2201, 4354, and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 80. The operator shall monitor and record the pressure differential gauge reading of each ceramic filter dust collector at least once during each day that the units operate. [District Rules 2201 and 4354 and 40 CFR Part 64] Federally Enforceable Through Title V Permit
- 81. Records of dust collector and bin vent filter maintenance, inspections and repairs shall be maintained. The records shall include, date of inspection, change outs of filter media, corrective action taken, and identification of the individual performing the inspection. [District Rules 2201 and 2520, 9.4.2] Federally Enforceable Through Title V Permit
- 82. Records of daily and quarterly amount of lime transferred into the lime storage silo shall be maintained. [District Rules 1070 and 2201] Federally Enforceable Through Title V Permit
- 83. All records shall be maintained and retained on-site for a period of at least 5 years and shall be made available for District inspection upon request. [District Rules 2201 and 4354 and 40 CFR Part 64] Federally Enforceable Through Title V Permit

APPENDIX D Quarterly Net Emissions Change

Quarterly Net Emissions Change (QNEC)

The Quarterly Net Emissions Change is used to complete the emission profile screen for the District's PAS database. The QNEC shall be calculated as follows:

QNEC = PE2 - PE1, where:

QNEC = Quarterly Net Emissions Change for each emissions unit, lb/qtr.

PE2 = Post-Project Potential to Emit for each emissions unit, lb/qtr.

PE1 = Pre-Project Potential to Emit for each emissions unit, lb/qtr.

Using the values in Sections VII.C.2 and VII.C.1 in the evaluation above, quarterly PE2 and quarterly PE1 can be calculated as follows:

PE2_{quarterly} = PE2_{annual} ÷ 4 quarters/year PE1_{quarterly}= PE1_{annual} ÷ 4 quarters/year

N-1662-1:

Quarterly NEC [QNEC]				
Pollutant	PE2 (lb/qtr)	PE1 (lb/qtr)	QNEC (lb/qtr)	
NO _X	46,984.50	61,696.75	(14,712.25)	
SO _X	36,543.50	45,086.25	(8,542.75)	
PM ₁₀	8,956.25	21,559.50	(12,603.25)	
CO	1,898.25	1,898.25	0	
VOC	949.25	949.25	0	

N-1662-2:

Quarterly NEC [QNEC]				
Pollutant	PE2 (lb/qtr)	PE1 (lb/qtr)	QNEC (lb/qtr)	
NO _X	38,845.25	51,008.75	(12,163.50)	
SO _X	30,213.00	37,275.75	(7,062.75)	
PM ₁₀	7,404.75	17,824.75	(10,420.00)	
CO	7,847.50	7,847.50	0	
VOC	784.75	784.75	0	

N-1662-3:

Quarterly NEC [QNEC]				
Pollutant	PE2 (lb/qtr)	PE1 (lb/qtr)	QNEC (lb/qtr)	
NO _X	51,008.75	38,845.25	(12,163.50)	
SO _X	37,275.75	30,213.00	(7,062.75)	
PM ₁₀	17,824.75	7,404.75	(10,420.00)	
CO	392.50	392.50	0	
VOC	784.75	784.75	0	

N-1662-4:

Quarterly NEC [QNEC]				
Pollutant	PE2 (lb/qtr)	PE1 (lb/qtr)	QNEC (lb/qtr)	
NO _X	57,626.25	75,671.00	(18,044.75)	
SO _X	44,820.50	55,298.00	(10,477.50)	
PM ₁₀	10,984.50	26,442.50	(15,458.00)	
CO	11,641.75	11,641.75	0	
VOC	1,164.25	1,164.25	0	

APPENDIX ECompliance Certification



San Joaquin Valley Air Pollution Control District



TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM

I.	TYPE OF PERMIT ACTION (Check appropriate box)				
	ADMINISTRATIVE AMENDMENT MINOR MODIFICATION SIGNIFICANT MODIFICATION				
	MPANY NAME: Gallo Glass Company FACILITY ID: N-1662 Type of Organization: Corporation Sole Ownership Government Partnership Utility				
	Owner's Name: Gallo Glass Company				
	Agent to the Owner: Darryl Shaffer				
II.	COMPLIANCE CERTIFICATION (Read each statement carefully and initial applicable circles for confirmation): Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continu	ue			
	to comply with the applicable federal requirement(s). Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.				
	Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.				
	Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true, accurate, and complete.				
(For minor modifications, this application meets the criteria for use of minor permit modification procedures pursuant to District Rule 2520.				
I de	cclare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:				
_	5/13/2022				
S	ignature of Responsible Official Date				
	Darryl Shaffer				
N	Jame of Responsible Official (please print)				
	Sr. Director Operations - Gallo Glass				
7	itle of Responsible Official (please print)				