Dear Mr. Van Fossen:

The Air Pollution Control Officer has issued the Authority to Construct permits to Tulare County Capital Projects & Facilities for the operation of a thermal soil desorption operation, at 1494 South Airport Road in Pixley. Enclosed are the Authority to Construct permits and a copy of the notice of final action to be published approximately three days from the date of this letter.

Notice of the District's preliminary decision to issue the Authority to Construct permits was published on May 2, 2014. The District's analysis of the proposal was also sent to CARB on April 29, 2014. No comments were received following the District's preliminary decision on this project.

Thank you for your cooperation in this matter. If you have any questions, please contact Mr. Leonard Scandura at (661) 392-5500.

Sincerely,

Arnaud Marjollet
Director of Permit Services

cc: Mike Tollstrup, CARB (w/enclosure) via email

Seyed Sadredin
Executive Director/Air Pollution Control Officer
AUTHORITY TO CONSTRUCT

PERMIT NO: S-8429-1-0
LEGAL OWNER OR OPERATOR: TULARE COUNTY CAPITAL PROJ/FACIL
MAILING ADDRESS:
5953 S. MOONEY AVENUE
VISALIA, CA 93277-9394
LOCATION:
1494 SOUTH AIRPORT ROAD
PIXLEY, CA

EQUIPMENT DESCRIPTION:
TRANSPORTABLE THERMAL DESORPTION SOIL REMEDIATION OPERATION INCLUDING FRONT END LOADED/UNLOADED EXCAVATED MATERIAL, DRYER CONVEYOR BELT, 49.3 MMBTU/HR ROTARY DRUM DRYER WITH A NATURAL GAS FIRED HAUCK MODEL SJPL1260E BURNER SERVED BY A NATURAL GAS FIRED 98.8 MMBTU/HR TARMAC MODEL T259-OX1015 THERMAL OXIDIZER, DISCHARGE AND DUST AUGERS ALL SERVED BY A TARMAC MODEL P-57X14 DUST COLLECTOR, FEED BIN WITH AUGER, WEIGH CONVEYOR BELT, SOIL CONDITIONER, SANDVIK MODEL QA340 MOBILE SCREENER POWERED BY PERMIT EXEMPT IC ENGINE, AND AN EDGE MODEL RTS80 MOBILE RADIAL STACKER POWERED BY A PERMIT EXEMPT IC ENGINE

CONDITIONS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201]
2. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
3. 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 as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
4. Visible emissions from the oxidizer (downstream from the baghouse) serving the soil remediation operation shall not equal or exceed 5% opacity for a period or periods aggregating more than three minutes in one hour. [District Rules 2201 and 4101]
5. All stockpiled soil shall be covered, or shall contain adequate moisture, such that visible emissions do not exceed 5% opacity for a period or periods aggregating more than three minutes in any one hour. [District Rules 2201 and 4101]
6. The soil remediation system shall be maintained in proper operating condition at all times. [District Rule 2201]
7. Rotary drum dryer and Thermal oxidizer shall only be fired on PUC natural gas. [District Rules 2201 and 4801]

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (661) 392-5500 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.

Seyed Sadredin, Executive Director / APCO

[Signature]
Arnaud Marjollet, Director of Permit Services
5-4-2014 (4:27:09 PM) • KLEVAND • Job Inspection Required with KLEVAND
Southern Regional Office • 34946 Flyover Court • Bakersfield, CA 93308 • (661) 392-5500 • Fax (661) 392-5585
8. The baghouse shall be equipped with a pressure differential gauge to indicate the pressure drop across the bags. The
gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location.  
[District Rule 2201]

9. Baghouse shall operate at all times with a differential pressure between 2 and 6 inches of water column. [District Rule 
2201]

10. If at any time baghouse visible emissions exceed 5% opacity or differential pressure is out of range, the soil desorption 
process shall be shut down until bags can be inspected and repaired or replaced. Records of each occurrence including 
date, time, and duration shall be maintained. [District Rule 2201]

11. Material removed from the dust collector shall be disposed of in a manner preventing entrainment into the atmosphere.  
[District Rule 2201]

12. The baghouse cleaning frequency and duration shall be adjusted to optimize the control efficiency. [District Rule 
2201]

13. PM10 emissions from the baghouse shall not exceed 0.004 gr/dscf. [District Rules 2201 and 4201]

14. Either the VOC control efficiency shall not be less than 95%, or the total VOC emission rate shall not exceed 2 pounds 
in any one day. [District Rule 2201]

15. Total VOC emissions from combusting VOC in the soil shall not exceed 0.60 pounds per ton of soil processed. 
[District Rule 2201]

16. Emissions from the combustion of natural gas in the dryer and thermal oxidizer shall not exceed any of the following 
limits: 4.3 ppmvd NOx @ 19% O2 (equivalent to 0.0492 lb-NOx/MMBtu), 0.0076 lb-PM10/MMBtu, 42 ppmvd CO @ 19% O2 (equivalent to 0.2924 lb-CO/MMBtu), or 0.0055 lb-VOC/MMBtu. If measured O2 concentration is greater 
than 19%, the corrected NOx or CO concentration is equal to the measured NOx or CO concentration. [District Rules 
2201, 4201, and 4309]

17. A non-resettable, totalizing hour-meter to measure the daily operation of the rotary drum dryer shall be installed, 
utilized and maintained. [District Rule 2201]

18. All equipment shall not be operated more than 12 hours in day nor 756 hours in a year. [District Rule 2201]

19. The amount of soil processed by the thermal desorption unit shall not exceed 400 tons in any day. [District Rule 2201]

20. The total footprint of the decontaminated soil stockpiles shall not exceed 0.344 acres in size. [District Rule 2201]

21. The contaminated soil stockpiles shall be covered with an impervious cover except when soils are being added to or 
removed from the stockpiles. [District Rule 2201]

22. The minimum operating temperature for the combustion chamber of the thermal oxidizer shall be maintained at or 
above 1400 degrees F. [District Rule 2201]

23. The thermal oxidizer shall be equipped with an operational temperature gauge to indicate the temperature of the 
combustion chamber. A continuously recording device shall be utilized to indicate the combustion chamber 
temperature during operation. [District Rule 2201]

24. The soil remediation system shall not be operated unless the combustion chamber is at or above minimum operating 
temperature. The system shall automatically terminate operation if the temperature drops below the minimum 
operating temperature. [District Rule 2201]

25. Sampling ports adequate for extraction of grab samples, measurement of gas flow rate, and use of an FID, PID, or 
other District-approved VOC detection device shall be provided for both the influent and the effluent gas streams. 
[District Rule 1081]

26. Laboratory samples shall be taken at the initial inspection, under the supervision of the APCD Inspector. Samples 
shall be taken from both the influent and the effluent gas stream sampling ports. [District Rule 1081]

27. Laboratory samples shall be analyzed for VOCs. [District Rule 2201]

CONDITIONS CONTINUE ON NEXT PAGE
28. Measurements to determine the influent and the effluent gas flow rates shall be taken at the initial inspection. Flow rate calculations shall be submitted to the District along with the laboratory sample analysis results. [District Rule 1081]

29. Initial compliance with VOC emission rate and control efficiency requirements shall be demonstrated by the results of the laboratory sample analysis. The results shall be submitted to the District within 60 days of the test. [District Rule 1081]

30. Ongoing compliance with VOC emission rate and control efficiency requirements shall be demonstrated by sampling both the influent and the effluent gas streams with an FID, PID, or other District-approved VOC detection device. [District Rule 1081]

31. Sampling to demonstrate ongoing compliance shall be performed at least once per month. [District Rule 1081]

32. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4309. [District Rule 4309]

33. Permittee shall monitor and record the stack concentration of NOx, CO, and O2 within 5 days of initial operation and at least once every month thereafter using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rule 4309]

34. If either the NOx or CO concentrations corrected to 19% O2 (or no correction if measured above 19% O2), as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of performing the notification and testing required by this condition. [District Rule 4309]

35. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rule 4309]

36. The permittee shall maintain records of: (1) the date and time of NOx, CO, and O2 measurements, (2) the O2 concentration in percent and the measured NOx and CO concentrations corrected to 19% O2 (or no correction if measured above 19% O2), (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rule 4309]

37. Differential operating pressure shall be monitored and recorded on each day that the baghouse operates. [District Rule 2201]

38. Records of all maintenance of the baghouse, including all change outs of filter media, shall be maintained. [District Rule 2201]

39. Permittee shall maintain records which demonstrate the unit is fired exclusively on PUC quality natural gas. [District Rule 4309]

40. The permittee shall maintain records of the daily contaminated soil throughput (in tons), the daily hours of operation, and the thermal incinerator operating temperature. [District Rule 2201]
41. Records of the cumulative running time and the measured influent and effluent VOC concentrations shall be maintained. [District Rule 2201]

42. All records shall be retained for a minimum of five years, and shall be made available for District inspection upon request. [District Rules 2201 and 4309]

43. Disturbances of soil related to any construction, demolition, excavation, extraction, or other earthmoving activities shall comply with the requirements for fugitive dust control in District Rule 8021 unless specifically exempted under Section 4.0 of Rule 8021 or Rule 8011. [District Rules 8011 and 8021]

44. An owner/operator shall submit a Dust Control Plan to the APCO prior to the start of any construction activity on any site that will include 10 acres or more of disturbed surface area for residential developments, or 5 acres or more of disturbed surface area for non-residential development, or will include moving, depositing, or relocating more than 2,500 cubic yards per day of bulk materials on at least three days. [District Rules 8011 and 8021]

45. An owner/operator shall prevent or cleanup any carryout or trackout in accordance with the requirements of District Rule 8041 Section 5.0, unless specifically exempted under Section 4.0 of Rule 8041 (8/19/04) or Rule 8011(8/19/04). [District Rules 8011 and 8021]

46. Whenever open areas are disturbed, or vehicles are used in open areas, the facility shall comply with the requirements of Section 5.0 of District Rule 8051, unless specifically exempted under Section 4.0 of Rule 8051 or Rule 8011. [District Rules 8011 and 8051]

47. Any paved road or unpaved road shall comply with the requirements of District Rule 8061 unless specifically exempted under Section 4.0 of Rule 8061 or Rule 8011. [District Rules 8011 and 8061]

48. Water, gravel, roadmix, or chemical/organic dust stabilizers/suppressants, vegetative materials, or other District-approved control measure shall be applied to unpaved vehicle travel areas as required to limit Visible Dust Emissions to 20% opacity and comply with the requirements for a stabilized unpaved road as defined in Section 3.59 of District Rule 8011. [District Rule 8011 and 8071]

49. Where dusting materials are allowed to accumulate on paved surfaces, the accumulation shall be removed daily or water and/or chemical/organic dust stabilizers/suppressants shall be applied to the paved surface as required to maintain continuous compliance with the requirements for a stabilized unpaved road as defined in Section 3.59 of District Rule 8011 and limit Visible Dust Emissions (VDE) to 20% opacity. [District Rule 8011 and 8071]

50. On each day that 50 or more Vehicle Daily Trips or 25 or more Vehicle Daily Trips with 3 axles or more will occur on an unpaved vehicle/equipment traffic area, permittee shall apply water, gravel, roadmix, or chemical/organic dust stabilizers/suppressants, vegetative materials, or other District-approved control measure as required to limit Visible Dust Emissions to 20% opacity and comply with the requirements for a stabilized unpaved road as defined in Section 3.59 of District Rule 8011. [District Rule 8011 and 8071]

51. Whenever any portion of the site becomes inactive, Permittee shall restrict access and periodically stabilize any disturbed surface to comply with the conditions for a stabilized surface as defined in Section 3.58 of District Rule 8011. [District Rules 8011 and 8071]

52. Records and other supporting documentation shall be maintained as required to demonstrate compliance with the requirements of the rules under Regulation VIII only for those days that a control measure was implemented. Such records shall include the type of control measure(s) used, the location and extent of coverage, and the date, amount, and frequency of application of dust suppressant, manufacturer's dust suppressant product information sheet that identifies the name of the dust suppressant and application instructions. Records shall be kept for one year following project completion that results in the termination of all dust generating activities. [District Rules 8011, 8031, and 8071]
AUTHORITY TO CONSTRUCT

PERMIT NO: S-8429-2-0

LEGAL OWNER OR OPERATOR: TULARE COUNTY CAPITAL PROJ/FACIL
MAILING ADDRESS: 5953 S. MOONEY AVENUE
                  VISALIA, CA 93277-9394

LOCATION: 1494 SOUTH AIRPORT ROAD
            PIXLEY, CA

EQUIPMENT DESCRIPTION: TRANSPORTABLE NON-ROAD 1,372 BHP (CONTINUOUS) CATERPILLAR MODEL XQ1000 TIER 2 CERTIFIED
                        DIESEL-FIRED IC ENGINE POWERING AN ELECTRICAL GENERATOR

CONDITIONS

1. No air contaminant shall be released into the atmosphere which causes a public nuisance. [District Rule 4102]
2. 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 as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101]
3. The exhaust stack shall vent vertically upward. The vertical exhaust flow shall not be impeded by a rain cap (flapper
   ok), roof overhang, or any other obstruction. [District Rule 4102]
4. Operation of this engine shall not exceed 12 hours per day nor 756 hours per year. [District Rules 2201 and 4102]
5. This engine shall be equipped with an operational non-resettable elapsed time meter or other APCO-approved
   alternative. [District Rules 2201 and 4702, 17 CCR 93115]
6. Permittee shall properly operate and maintain engine and monitor the operational characteristics of the engine as
   recommended by the engine manufacturer. [District Rule 4702]
7. Emission rates from this unit shall not exceed any of the following limits: NOx (as NO2) 4.56 g/hp-hr; VOC (as
   methane) 0.24 g/hp-hr; CO 2.6 g/hp-hr; or SOx (as SO2) 0.0051 g/hp-hr. [District Rules 2201 and 4702]
8. The PM10 emissions rate from the engine shall not exceed 0.15 g/hp-hr based on US EPA certification using ISO 8178
   test procedure. [District Rules 2201, 4102, and 4201]
9. Only CARB certified diesel fuel containing not more than 0.0015% sulfur by weight is to be used. [District Rules
   2201, 4701, 4702, 4801, 17 CCR 93115]

CONDITIONS CONTINUE ON NEXT PAGE

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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.

Seyed Sadredin, Executive Director / APCO
10. This nonroad transportable engine shall not be operated at one location for more than 12 consecutive months and shall meet all the requirements of a nonroad transportable engine, per CFR Title 40 Part 89. [District Rule 4702 and 17 CCR 93115]

11. The operator shall maintain a monthly operating log for this engine that includes all of the following information: The time and date of engine operation, total hours of operation, type of fuel used, any maintenance or modifications performed, and all monitored operational characteristics. [District Rule 4702 and 17 CCR 93115]

12. All records shall be retained for a minimum of five years, and shall be made available for District inspection upon request. [District Rule 2201]