NOV 10 2014

Julia Bonardi,
Gallo Glass Company
PO Box 1230
Modesto, CA 95353

Re: Notice of Preliminary Decision - Authority to Construct
Facility Number: N-1662
Project Number: N-1142733

Dear Ms. Bonardi:

Enclosed for your review and comment is the District’s analysis of Gallo Glass Company’s application for an Authority to Construct for the installation of two natural gas-fired annealing ovens, at 605 S Santa Cruz Ave, Modesto, CA.

The notice of preliminary decision for this project will be published approximately three days from the date of this letter. After addressing all comments made during the 30-day public notice and 45-day EPA notice comment periods, the District intends to issue the Authority to Construct. Please submit your written comments on this project within the 30-day public comment period, as specified in the enclosed public notice.

Thank you for your cooperation in this matter. If you have any questions regarding this matter, please contact Mr. James Harader of Permit Services at (209) 557-6445.

Sincerely,

Arnaud Marjollet
Director of Permit Services

Enclosures

cc: Mike Tollstrup, CARB (w/ enclosure) via email
cc: Gerardo C. Rios, EPA (w/ enclosure) via email
San Joaquin Valley Air Pollution Control District
Authority to Construct
Application Review
Replace Electric Lehrs with Natural Gas-Fired Lehrs

Facility Name: Gallo Glass Company
Mailing Address: PO Box 1230
               Modesto, CA 95353
Contact Person: Julia Bonardi
Telephone: (209) 341-4298
Application #s: N-1662-17-0 and '18-0
Project #: N-1142733
Deemed Complete: August 15, 2014

Date: October 5, 2014
Engineer: James Harader
Lead Engineer: Nick Peirce

I. Proposal

Gallo Glass Company operates 16 Lehr shops downstream of its five glass furnaces. In a separate project, Gallo Glass Company is proposing to rebuild glass furnace #2, which will increase the glass production rate of that furnace. To accommodate the increase in glass production from the furnace, the glass throughput will need to be increased for Lehr shops #21, #22, and #23 that operate downstream of glass furnace #2. In order to increase the production throughput in the lehr shops, Gallo Glass Company has applied for Authority to Construct permits to replace the 130 tons per day electric lehrs in Lehr Shops #21 and #23 with two larger natural gas-fired lehrs with a glass processing capacity of 160 tons per day, each.

The District has typically permitted lehrs as separate permit units; therefore, each of the new natural glass fired lehr’s will be permitted under a new permit unit.

Title V

Gallo Glass Company has been issued a Title V permit. This modification can be classified as a Title V significant 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, a 30-day public notice and a 45-day EPA comment period will be satisfied prior to the issuance of the Authority to Construct. Gallo Glass Company must apply to administratively amend their Title V permit.

II. Applicable Rules

Rule 2201 New and Modified Stationary Source Review Rule (4/21/11)
Rule 2410 Prevention of Significant Deterioration (6/16/11)
Rule 2520 Federally Mandated Operating Permits (6/21/01)
Rule 4001 New Source Performance Standards (4/14/99)
Rule 4002 National Emissions Standards for Hazardous Air Pollutants (5/20/04)
III. Project Location

This equipment is located at 605 S Santa Cruz Ave in Modesto, CA and the District has confirmed that this equipment is not located within 1,000 feet of a K-12 School.

IV. Process Description

Hot formed glass exits the glass former at a temperature of approximately 1,000 °F. The lehr is a tunnel through which a belt, which contains the formed glass, passes. The tunnel is divided into hot zones at the upstream end and cool zones on the downstream end. The hot zones are heated either electrically or with gas burners and operate at temperatures as high as 1,150 °F. The hot zones essentially bake the formed glass to allow the glass to anneal before entering the cold zones. The unheated cold zones allow the glass to slowly cool to a temperature of approximately 250 °F to 300 °F. Recirculating fans blow high velocity air into each zone to convectively heat or cool the glass.

The 12-foot wide belt will feed the hot formed glass into each of the new natural gas-fired lehr's. Each lehr tunnel will be approximately 16 feet wide and 63 feet long. Each of the two new natural gas-fired lehrs will contain five hot zones and 4 cold zones. Each of the lehrs will be equipped with ten 0.5 MMBtu/hr burners, for a total maximum heat input rating of 5 MMBtu/hr per lehr.

Operating Schedule:

This equipment will operate 24 hours/day, 365 days/year.

V. Equipment Listing

Post-Project Equipment Description:

N-1662-17-0: 5.0 MMBTU/HR NATURAL GAS-FIRED LEHR WITH ECLIPSE RA0075 BURNERS, OR EQUIVALENT (LEHR SHOP #21 SERVING GLASS FURNACE #2)
VI. Emission Control Technology Evaluation

Each lehr is equipped with Eclipse Ratio Air natural gas-fired burners. The burners operate in a high excess oxygen environment and are rated at 60 ppm NOx at 3% oxygen.

VII. General Calculations

A. Assumptions

- The lehrs will operate 24 hours/day, 365 days/year.
- The higher heating value of natural gas is 1,000 Btu/scf.
- The f-factor for natural gas is 8,578 scf/MMBtu.
- The only source of emissions in the lehr is the combustion of natural gas by the burners.
- All PM10 is assumed to be PM2.5.
- All other assumptions will be stated as they are made.

B. Emission Factors

1. Pre-Project Emission Factors

The existing lehrs are electric; therefore, there is no emissions expected. Therefore, no pre-project emission factors apply to this project.

2. Post-Project Emission Factors

N-1662-17-0 and -18-0

The new natural gas-fired lehrs are identical. The following table lists the post-project emission factors for the lehrs.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Post-Project Emission Factors (EF2) and/or Emission Rates</th>
<th>Source</th>
</tr>
</thead>
<tbody>
<tr>
<td>NOX</td>
<td>0.073 lb/MMBtu (equivalent to 60 ppmv @ 3% O2)</td>
<td>Burner Manufacturer</td>
</tr>
<tr>
<td>SOX</td>
<td>0.00285 lb/MMBtu</td>
<td>District Policy APR 1720</td>
</tr>
<tr>
<td>PM10</td>
<td>0.0076 lb/MMBtu</td>
<td>AP-42 Table 1.4-2 (7/98)</td>
</tr>
<tr>
<td>CO</td>
<td>0.015 lb/MMBtu (equivalent to 20 ppmv @ 3% O2)</td>
<td>Burner Manufacturer</td>
</tr>
<tr>
<td>VOC</td>
<td>0.0055 lb/MMBtu</td>
<td>AP-42 Table 1.4-2 (7/98)</td>
</tr>
</tbody>
</table>
C. Calculations

1. Pre-Project Potential to Emit (PE1)

Emissions from the existing electric lehrs are equal to zero.

2. Post Project Potential to Emit (PE2)

N-1662-17-0 and '18-0

The natural gas-fired lehrs are identical. The following emission calculations are applicable to each lehr.

The following formulas will be used to calculate emissions from each of the lehrs.

\[
\text{PE2}_{\text{Daily}} = 5.0 \ \text{MMBtu/hr} \times \text{EF (lb/MMBtu)} \times 24 \ \text{hr/day}
\]

\[
\text{PE2}_{\text{Annual}} = 5.0 \ \text{MMBtu/hr} \times \text{EF (lb/MMBtu)} \times 8760 \ \text{hr/year}
\]

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>EF (lb/MMBtu)</th>
<th>PE2 Daily (lb/day)</th>
<th>PE2 Annual (lb/year)</th>
</tr>
</thead>
<tbody>
<tr>
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<td>8.8</td>
<td>3,197</td>
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<tr>
<td>SO\textsubscript{x}</td>
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<td>333</td>
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<tr>
<td>PM\textsubscript{2.5}</td>
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<td>333</td>
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<tr>
<td>CO</td>
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<td>VOC</td>
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<td>0.7</td>
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</table>

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

Pursuant to Section 4.9 of District Rule 2201, the Pre-Project Stationary Source Potential to Emit (SSPE1) is the Potential to Emit (PE) from all units with valid ATCs or PTOs at the Stationary Source and the quantity of Emission Reduction Credits (ERCs) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site. Unless otherwise noted, the SSPE data in the following table was obtained from the application review for District Project N-1141107.
### Pre-Project Stationary Source Potential to Emit (lb/year)

<table>
<thead>
<tr>
<th>Permit Unit</th>
<th>NO&lt;sub&gt;x&lt;/sub&gt;</th>
<th>SO&lt;sub&gt;x&lt;/sub&gt;</th>
<th>PM&lt;sub&gt;10&lt;/sub&gt;</th>
<th>PM&lt;sub&gt;2.5&lt;/sub&gt;</th>
<th>CO</th>
<th>VOC</th>
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<tbody>
<tr>
<td>N-1662-1-15</td>
<td>265.771</td>
<td>189.938</td>
<td>86.238</td>
<td>61.229</td>
<td>7.593</td>
<td>43.662</td>
</tr>
<tr>
<td>N-1662-2-17</td>
<td>204.035</td>
<td>155.381</td>
<td>71.298</td>
<td>51.080</td>
<td>31.390</td>
<td>3.139</td>
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<td>179.923</td>
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<td>58.382</td>
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<td><strong>SSPE1</strong></td>
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<td><strong>704,639</strong></td>
<td><strong>410,772</strong></td>
<td><strong>285,715</strong></td>
<td><strong>93,966</strong></td>
<td><strong>131,481</strong></td>
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<td><strong>SSPE1 (w/ERC's)</strong></td>
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<td><strong>704,639</strong></td>
<td><strong>503,670</strong></td>
<td><strong>285,715</strong></td>
<td><strong>99,437</strong></td>
<td><strong>131,481</strong></td>
</tr>
</tbody>
</table>

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

Pursuant to Section 4.10 of District Rule 2201, the Post Project Stationary Source Potential to Emit (SSPE2) 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 that have occurred at the source, and which have not been used on-site.
Gallo Glass Company  
N1662, 1142733  

5. Major Source Determination

District Rule 2201 Major Source Determination

Pursuant to Section 3.24 of District Rule 2201, a Major Source is a stationary source with post-project emissions or a Post Project Stationary Source Potential to Emit (SSPE2), equal to or exceeding one or more of the following threshold values. However, Section 3.24.2 states, “for the purposes of determining major source status, the SSPE2 shall not include the quantity of emission reduction credits (ERC) which have been banked since September 19, 1991 for Actual Emissions Reductions that have occurred at the source, and which have not been used on-site.”

### Major Source Thresholds

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>SSPE2 W/O ERC lb/year</th>
<th>SSPE2 (w/ERC's) lb/year</th>
<th>Major Source Thresholds lb/year</th>
<th>Major Source?</th>
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</thead>
<tbody>
<tr>
<td>NOx</td>
<td>978,312</td>
<td>2,076,180</td>
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<tr>
<td>SOx</td>
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<td>286,381</td>
<td>140,000</td>
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<td>PM₁₀</td>
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<tr>
<td>VOC</td>
<td>131,963</td>
<td>131,963</td>
<td>20,000</td>
<td>Yes</td>
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</table>

### Post-Project Stationary Source Potential to Emit (lb/year)

<table>
<thead>
<tr>
<th>Permit Unit</th>
<th>NOₓ</th>
<th>SOₓ</th>
<th>PM₁₀</th>
<th>PM₂₅</th>
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<td>1,890</td>
<td>78</td>
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<tr>
<td>N-1662-8-7</td>
<td>5,994</td>
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<td>92,898</td>
<td>N/A</td>
<td>0</td>
<td>0</td>
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</tbody>
</table>

SSPE2 (w/o ERGs) 978,312 704,889 411,438 286,381 95,280 131,963

SSPE2 (w/ERC's) 2,076,180 704,889 504,336 286,381 100,751 131,963
As shown in the previous table, this facility is a Major Source for NOx, SOx, PM10, PM2.5, and VOC emissions.

**District 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)(i). Therefore, the following PSD Major Source thresholds are applicable.

<table>
<thead>
<tr>
<th>PSD Major Source Determination (tons/year)</th>
<th>NO2</th>
</tr>
</thead>
<tbody>
<tr>
<td>Facility PE before Project</td>
<td>486</td>
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<tr>
<td>PSD Major Source Thresholds</td>
<td>250</td>
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<tr>
<td>PSD Major Source ? (Y/N)</td>
<td>Yes</td>
</tr>
</tbody>
</table>

As shown above, the facility is an existing Major Source for PSD since NO2 emissions are greater than the PSD Major Source Threshold.

6. **District Baseline Emissions (BE)**

BE = Pre-project Potential to Emit 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.

The existing electric-fired lehrs do not emit any pollutants. Therefore, BE is equal to zero for all pollutants.

7. **SB288 Modification**

An SB 288 Major Modification is defined in 40 CFR Part 51.165 (in effect 12/19/02) 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."

This facility is a Major Source for NOx, SOx, PM10, PM2.5, and VOC emissions. There is no SB288 Major Modification threshold for PM2.5 emissions; therefore, an SB288 Modification cannot be triggered for PM2.5.
SB288 calculations are required for NOx, SOx, PM10, and VOC, to determine whether this project will trigger an SB288 Modification. A project triggers an SB288 Modification if the net emissions increase (NEI) exceeds the thresholds in District Rule 2201. The respective thresholds are 50,000 lb-NOx/year, 80,000 lb-SOx/year, 30,000 lb-PM10/year and 50,000 lb-VOC/year.

For existing units, NEI is equal to PE2 – BAE, where:

BAE = Baseline average annual emissions over a representative 2-years of operation.

Since the pre-project emissions for the existing lehr’s are equal to zero, BAE is equal to zero for the Lehrs. Therefore, for the natural gas-fired Lehr’s, the NEI is equal to PE2.

It is determined that the installation of the natural gas-fired lehr’s is related to the previous project to expand glass furnace #2, District Project N-1141107. Therefore, Federal NSR considers the changes to the furnace and to the lehr’s to be one project and the NEI from District Project N-1141107 will be included to determine whether the project triggers an SB288 Modification. The following formula will be used to determine the NEI:

\[
\text{NEI}_{\text{Total}} = \text{PE2}_{\text{Lehr}} + \text{NEI}_{\text{Project N-1141107, SB288 Calculations}}
\]

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>PE2_{Lehr} (lb/year)</th>
<th>NEI_{Project N-1141107} (lb/year)</th>
<th>NEI_{Total} (lb/year)</th>
<th>SB288 Modification Threshold</th>
</tr>
</thead>
<tbody>
<tr>
<td>NOx</td>
<td>6,394</td>
<td>112,021</td>
<td>118,415</td>
<td>50,000 lb/year</td>
</tr>
<tr>
<td>SOx</td>
<td>250</td>
<td>70,750</td>
<td>71,000</td>
<td>80,000 lb/year</td>
</tr>
<tr>
<td>PM10</td>
<td>666</td>
<td>58,158</td>
<td>58,158</td>
<td>30,000 lb/year</td>
</tr>
<tr>
<td>VOC</td>
<td>482</td>
<td>2,665</td>
<td>2,665</td>
<td>50,000 lb/year</td>
</tr>
</tbody>
</table>

As shown in the table above, NEI_{Total} is greater than the SB288 Modification thresholds for NOx and PM10; therefore, this project triggers an SB288 Modification for NOx and PM10. District project N-1140117 was previously determined to trigger an SB288 Modification for NOx and PM10 and the SB288 requirements for the expansion of Glass Furnace #2 were addressed within that project; therefore, it is not necessary to reexamine the modifications proposed in District Project N-1140117.

8. Federal Major Modification

District Rule 2201, Section 3.17 states that Federal Major Modifications are the same as "Major Modification" as defined in 40 CFR 51.165 and part D of Title I of the CAA.

This facility is a Major Source for NOx, SOx, PM10, PM2.5, and VOC emissions. Therefore, Federal Major Modification calculations are required for these pollutants to determine whether this project will trigger an SB288 Modification. A project triggers a Federal Major Modification if the net emissions increase (NEI) exceeds the thresholds in the following table:
The NEI is calculated as follows:

\[
\text{NEI} = \text{PAE} - \text{BAE}
\]

Where,

\[
\text{PAE} = \text{Projected Actual Emissions}
\]
\[
\text{BAE} = \text{Baseline Average Emissions (any 24-month period within last 10 years)}
\]

For existing units, NEI is equal to PE2 - BAE, where:

\[
\text{BAE} = \text{Baseline average annual emissions over a representative 2-years of operation.}
\]

Since the pre-project emissions for the existing lehr's are equal to zero, BAE is equal to zero for the Lehrs. Therefore, for the natural gas-fired Lehr's, the NEI is equal to PE2.

It is determined that the installation of the natural gas-fired lehr's is related to the previous project to expand glass furnace #2, District Project N-1141107. Therefore, Federal NSR considers the changes to the furnace and to the lehr's to be one project and the NEI from District Project N-1141107 will be included to determine whether the project triggers a Federal Major Modification. The following formula will be used to determine the NEI:

\[
\text{NEI}_{\text{Total}} = \text{PE2}_{\text{Lehrs}} + \text{NEI}_{\text{Project N-1141107, FMM Calculations}}
\]

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>(\text{PE2}_{\text{Lehrs}}) (lb/year)</th>
<th>(\text{NEI}_{\text{Project N-1141107}}) (lb/year)</th>
<th>(\text{NEI}_{\text{Total}}) (lb/year)</th>
<th>SB288 Modification Threshold</th>
</tr>
</thead>
<tbody>
<tr>
<td>NOx</td>
<td>6,394</td>
<td>33,000</td>
<td>39,394</td>
<td>0 lb/year</td>
</tr>
<tr>
<td>SOx</td>
<td>250</td>
<td>63,479</td>
<td>63,729</td>
<td>80,000 lb/year</td>
</tr>
<tr>
<td>PM10</td>
<td>666</td>
<td>11,238</td>
<td>11,904</td>
<td>30,000 lb/year</td>
</tr>
<tr>
<td>PM2.5(^{1})</td>
<td>666</td>
<td>11,238</td>
<td>11,904</td>
<td>20,000 lb/year</td>
</tr>
<tr>
<td>VOC</td>
<td>482</td>
<td>2,665</td>
<td>3,147</td>
<td>0 lb/year</td>
</tr>
</tbody>
</table>

\(^{1}\) A Federal Major Modification for PM2.5 may also be triggered if the NEI_{Total} for NOx or SOx are 80,000 lb/year or greater. Since the NEI_{Total} is less than these additional thresholds and less than the direct PM2.5 threshold of 20,000 lb/year, a Federal Major Modification is not triggered for PM2.5.
As shown in the previous table, $NEI_{Total}$ is greater than the Federal Major Modification thresholds for NOx and VOC; therefore, this project triggers a Federal Major Modification for NOx and VOC. District project N-11400117 was previously determined to trigger an Federal Major Modification for NOx and VOC and Federal Major Modification requirements for the expansion of Glass Furnace #2 were addressed within that project; therefore, it is not necessary to reexamine the modifications proposed in District Project N-1140117.

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

Rule 2410 applies to pollutants for which the District is in attainment or for unclassified, pollutants. The pollutants addressed in the PSD applicability determination are listed as follows:

- NO2 (as a primary pollutant)
- SO2 (as a primary pollutant)
- CO
- PM
- PM10
- Greenhouse gases (GHG): CO2, N2O, CH4, HFCs, PFCs, and SF6

The first step of this PSD evaluation consists of determining whether the facility is an existing PSD Major Source or not (See Section VII.C.5 of this document).

In the case the facility is an existing PSD Major Source, the second step of the PSD evaluation is to determine if the project results in a PSD significant increase.

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 major source for PSD. Because the project is not located within 10 km 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. Significance of Project Emission Increase Determination

a. Potential to Emit of attainment/unclassified pollutant for New or Modified Emission Units vs PSD Significant Emission Increase Thresholds

As a screening tool, the potential to emit from all new and modified units is compared to the PSD significant emission increase thresholds, and if total potential to emit from all new and modified units is below this threshold, no further analysis will be needed.
The values shown in the below table include the potential to emit from glass furnace #2, since the modifications to glass furnace #2 are considered part of the same stationary source project for PSD. The greenhouse gas emission rate was provided by the applicant and is based on testing results for glass furnaces and lehr units.

| PSD Significant Emission Increase Determination: Potential to Emit (tons/year) |
|-----------------|--------|--------|---------|---------|--------|
|                 | NO₂    | SO₂    | CO      | PM²     | PM₁₀²  | CO₂e   |
| Total PE from New and Modified Units | 105.2  | 77.8   | 16.4    | 32.1    | 23.1   | 57,133 |
| PSD Significant Emission Increase Thresholds | 40     | 40     | 100     | 25      | 15     | 75,000 |
| PSD Significant Emission Increase? | Y      | Y      | N       | Y       | Y      | N      |

As demonstrated above, because the project has a total potential to emit from all new and modified emission units greater than PSD significant emission increase thresholds for NO₂, SO₂, PM, and PM₁₀, further analysis is required for NO₂, SO₂, PM, and PM₁₀ to determine if the project has an emission increase greater than the PSD significant emission increase thresholds for those pollutants.

b. Emission Increase for Each Attainment/Unclassified Pollutant with a Significant Emission Increase vs PSD Significant Emission Increase Thresholds

In this step, the emission increase for each remaining attainment/unclassified pollutant is compared to the PSD significant emission increase thresholds, and if emission increase for each attainment pollutant is below this threshold, no further analysis is needed.

The method to calculate the NEI is identical to the method used for determining the NEI in the Federal Major Modification Calculations shown earlier in this evaluation.

**NO₂**

The NEI for NO₂ is identical to the NEI calculated for NOₓ in the Federal Major Modification section of this evaluation. Thus,

\[
\text{NEI} = 39,394 \text{ lb-NO}_2/\text{year} = 19.7 \text{ tons-NO}_2 \text{ year}
\]

---

2 The PM and PM₁₀ emission rates in this table do not include PM and PM₁₀ emissions from the potentially debottlenecked batch plant.
Since the NEI for NO\textsubscript{2} is less than the PSD significant emission increase threshold of 40 tons-NO\textsubscript{2}/year, the project does not trigger PSD for NO\textsubscript{2}. A 10-year NO\textsubscript{2} recordkeeping requirement will be included on the permit to ensure that PSD is not triggered following the modifications to the glass furnace.

**SO\textsubscript{2}**

The NEI for SO\textsubscript{2} is identical to the NEI calculated for SO\textsubscript{x} in the Federal Major Modification section of this evaluation. Thus,

\[
\text{NEI} = 63,729 \text{ lb-SO}_2/\text{year} = 31.9 \text{ tons-SO}_2/\text{year}
\]

Since the NEI for SO\textsubscript{2} is less than the PSD significant emission increase threshold of 40 tons-SO\textsubscript{2}/year, the project does not trigger PSD for SO\textsubscript{2}. Furthermore, even when the NEI is calculated as PE\textsubscript{2} – BA\textsubscript{E}, the 40 ton significant threshold is not triggered. Therefore, recordkeeping for SO\textsubscript{x} emissions will not be required to demonstrate that PSD will not be triggered following the modifications to the glass furnace.

**PM\textsubscript{10}**

The NEI for PM\textsubscript{10} is identical to the NEI calculated for PM\textsubscript{10} in the Federal Major Modification section of this evaluation. Thus,

\[
\text{NEI}_{\text{total}} = 11,904 \text{ lb-PM}_{10}/\text{year} = 5.9 \text{ tons-PM}_{10}/\text{year}
\]

Since the NEI for PM\textsubscript{10} is less than the PSD significant emission increase threshold of 15 tons-PM\textsubscript{10}/year, the project does not trigger PSD for PM\textsubscript{10}. A 10-year PM\textsubscript{10} recordkeeping requirement will be included on the permit to ensure that PSD is not triggered following the modifications to the glass furnace.

**PM**

The NEI for PM from District project N-1141107 was 20,025 lb-PM/year. All PM from the proposed lehrs is PM\textsubscript{10}. This project will add 666 lb-PM/year to the NEI. Thus,

\[
\text{NEI}_{\text{total}} = 14,984 \text{ lb-PM}/\text{year} + 666 \text{ lb-PM}/\text{year} = 15,650 \text{ lb-PM}/\text{year}
\]

\[
\text{NEI}_{\text{total}} = 7.8 \text{ tons-PM}/\text{year}
\]

Since the NEI for PM is less than the PSD significant emission increase threshold of 25 tons PM/year, the project does not trigger PSD for PM. A 10-year PM recordkeeping requirement will be included on the permit to ensure that PSD is not triggered following the modifications to the glass furnace.

**Summary**

Therefore, the project will not trigger a PSD Major Modification.
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. Detailed QNEC calculations are included in Appendix IV.

VIII. Compliance

Rule 2201 New and Modified Stationary Source Review Rule

A. Best Available Control Technology (BACT)

1. BACT Applicability

BACT requirements are triggered on a pollutant-by-pollutant basis and on an emissions unit-by-emissions unit basis for the following*:

a. Any new emissions unit with a potential to emit exceeding two pounds per day,
b. The relocation from one Stationary Source to another of an existing emissions unit with a potential to emit exceeding two pounds per day,
c. Modifications to an existing emissions unit with a valid Permit to Operate resulting in an AIPE exceeding two pounds per day, and/or
d. Any new or modified emissions unit, in a stationary source project, which results in a Major Modification.

*Except for CO emissions from a new or modified emissions unit at a Stationary Source with an SSPE2 of less than 200,000 pounds per year of CO.

a. New emissions units with PE exceeding 2.0 lb/day

The replacement natural gas-fired lehrs are new emission units. The following analysis is applicable to each of the identical natural gas-fired lehrs.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Daily Emissions for Each Lehr (lb/day)</th>
<th>BACT Threshold (lb/day)</th>
<th>SSPE2 (lb/yr)</th>
<th>BACT Triggered?</th>
</tr>
</thead>
<tbody>
<tr>
<td>NOx</td>
<td>8.8</td>
<td>&gt; 2.0</td>
<td>n/a</td>
<td>Yes</td>
</tr>
<tr>
<td>SOx</td>
<td>0.3</td>
<td>&gt; 2.0</td>
<td>n/a</td>
<td>No</td>
</tr>
<tr>
<td>PM10</td>
<td>0.9</td>
<td>&gt; 2.0</td>
<td>n/a</td>
<td>No</td>
</tr>
<tr>
<td>CO</td>
<td>1.8</td>
<td>&gt; 2.0 and SSPE2 ≥ 200,000 lb/yr</td>
<td>100,751</td>
<td>No</td>
</tr>
<tr>
<td>VOC</td>
<td>0.7</td>
<td>&gt; 2.0</td>
<td>n/a</td>
<td>No</td>
</tr>
</tbody>
</table>

As shown above, BACT will be triggered for NOx from each lehr.
b. The relocation of a unit from one stationary to another stationary source.

The applicant is not proposing to relocate any emissions units to another stationary source.

c. Modifications to an existing emissions unit with an Adjusted Increase in Potential to Emit (AIPE) exceeding 2.0 pounds per day.

There are no modified units in this project.

d. Any new or modified emissions unit, in a stationary source project, which results in a major modification.

This project triggers an SB288 Modification for NOx and PM10 emissions and triggers a Federal Major Modification for NOx and VOC emissions. Therefore, BACT is triggered for NOx, PM10, and VOC emissions.

As shown above, BACT is triggered for NOx, PM10, and VOC emissions.

2. BACT Guideline

BACT Guideline 1.5.10, for Container Glass Production – Container Glass Lehr, is applicable to the lehrs in this project. For a copy of the BACT Guideline, see Appendix II.

3. Top-Down BACT Analysis

Per the Top-Down BACT Analysis in Appendix II, BACT is satisfied with the following:

<table>
<thead>
<tr>
<th>NOx</th>
<th>Natural gas-fired container glass lehr with emissions of 60 ppmv NOx @ 3% O2 or 0.073 lb-NOx/MMBtu and using LPG backup fuel.</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM10</td>
<td>No add-on control technologies are required.</td>
</tr>
<tr>
<td>VOC</td>
<td>No add-on control technologies are required.</td>
</tr>
</tbody>
</table>

As shown in the Top-Down BACT Analysis in Appendix II, the facilities proposal meets the above requirements. Therefore, BACT requirements are satisfied by this proposal.

B. Offsets

1. Offset Applicability:

Pursuant to Section 4.5.3, offset requirements shall be triggered on a pollutant by pollutant basis and shall be required if the Post-project Stationary Source Potential to Emit (SSPE2) equals to or exceeds emissions of 20,000 lbs/year for NOx and VOC, 200,000 lbs/year for CO, 54,750 lbs/year for SOx and 29,200 lbs/year for PM10.
Offsets for PM2.5 are not triggered, since this project is not a Federal Major Modification for PM2.5.

2. Quantity of Offsets Required:

Per Sections 4.7.2 and 4.7.3, the quantity of offsets, in pounds per year, is calculated as follows for sources with an SSPE1 greater than the offset threshold levels before implementing the project being evaluated.

Offsets Required (lb/year) = \((\text{PE2} - \text{BE}) + \text{ICCE}) \times \text{DOR}\), for all new or modified emissions units in the project,

Where,

\[ \begin{align*}
\text{PE2} & = \text{Post Project Facility Potential to Emit, (lb/year)} \\
\text{BE} & = \text{Baseline Emissions (lb/year)} \\
\text{ICCE} & = \text{Increase in Cargo Carrier Emissions, (lb/year)} \\
\text{DOR} & = \text{Distance Offset Ratio, determined pursuant to Section 4.8}
\end{align*} \]

As stated in the calculations section earlier, BE is equal to zero. Additionally, there is no cargo carrier emissions expected from this proposal, thus, ICCE is equal to zero.

Offsets Required = \( \Sigma \text{PE2} \times \text{DOR}\)

The quantity of offsets required, without factoring in the offset distance ratio, for each pollutant is shown in the following table.

\[\begin{array}{|c|c|c|c|c|}
\hline
& \text{NOx} & \text{SOx} & \text{PM10} & \text{VOC} \\
\text{lb/year} & \text{lb/year} & \text{lb/year} & \text{lb/year} & \text{lb/year} \\
\hline
\text{Offsets} = \Sigma \text{PE2} & 6,394 & 0 & 666 & 482 \\
\hline
\end{array}\]

\[\text{SOx emissions from each of the lehrs is less than 0.5 lb/day. Pursuant to District Policy APR 1130, a daily increase in permitted emissions of a criteria pollutant of less than or equal to 0.5 lb/day per permit unit is rounded to 0 lb/day for the purpose of determining whether NSR rule requirements are triggered. Thus, the SOx emissions from each lehr have been rounded to 0 and SOx offsets are not required.}\]
NOx

The following table shows the quantity of offsets required by quarter for NOx, which have been calculated using the ratio of the number of days per quarter to the number of days/year. Since this is a Federal Major Modification for NOx, the distance ratio is 1.5 per Section 4.8.1 of District Rule 2201. The facility has proposed to use ERC Certificate N-900-2 to offset the NOx emissions from this project.

<table>
<thead>
<tr>
<th>Quarter</th>
<th>Q1</th>
<th>Q2</th>
<th>Q3</th>
<th>Q4</th>
</tr>
</thead>
<tbody>
<tr>
<td>Days</td>
<td>90</td>
<td>91</td>
<td>92</td>
<td>92</td>
</tr>
<tr>
<td>Quantity of NOx Offsets Required (lb) without the distance ratio</td>
<td>1,576</td>
<td>1,594</td>
<td>1,612</td>
<td>1,612</td>
</tr>
<tr>
<td>Distance Ratio</td>
<td>1.5</td>
<td>1.5</td>
<td>1.5</td>
<td>1.5</td>
</tr>
<tr>
<td>Quantity of NOx Offsets Required (lb) with the distance ratio</td>
<td>2,364</td>
<td>2,391</td>
<td>2,418</td>
<td>2,418</td>
</tr>
<tr>
<td>Quantity of ERC's Reserved from N-900-2</td>
<td>2,364</td>
<td>2,391</td>
<td>2,418</td>
<td>2,418</td>
</tr>
</tbody>
</table>

The quantity of NOx credits available from ERC Credit N-900-2 is sufficient to offset emissions from the project.

PM10

The following table shows the quantity of offsets required by quarter for PM10, which have been calculated using the ratio of the number of days per quarter to the number of days/year. The facility has proposed to use ERC Certificate N-161-4 to offset the PM10 emissions from this project. Since the reductions that generated the credits for N-161-4 were from the same stationary source, the offset distance ratio is 1.0.

<table>
<thead>
<tr>
<th>Quarter</th>
<th>Q1</th>
<th>Q2</th>
<th>Q3</th>
<th>Q4</th>
</tr>
</thead>
<tbody>
<tr>
<td>Days</td>
<td>90</td>
<td>91</td>
<td>92</td>
<td>92</td>
</tr>
<tr>
<td>Quantity of PM10 Offsets Required (lb) without the distance ratio</td>
<td>119</td>
<td>166</td>
<td>168</td>
<td>168</td>
</tr>
<tr>
<td>Distance Ratio</td>
<td>1.0</td>
<td>1.0</td>
<td>1.0</td>
<td>1.0</td>
</tr>
<tr>
<td>Quantity of PM10 Offsets Required (lb) with the distance ratio</td>
<td>164</td>
<td>166</td>
<td>168</td>
<td>168</td>
</tr>
<tr>
<td>Quantity of ERC's Reserved from N-161-4</td>
<td>3,185</td>
<td>3,220</td>
<td>3,255</td>
<td>3,256</td>
</tr>
</tbody>
</table>

The quantity of PM10 credits available from ERC Credit N-161-4 is sufficient to offset emissions from the project.
VOC

The following table shows the quantity of offsets required by quarter for VOC emissions, which have been calculated using the ratio of the number of days per quarter to the number of days/year. The facility has proposed to use ERC Certificate S-4126-1 to offset the VOC emissions from this project. Since this is a Federal Major Modification for VOC, the distance ratio is 1.5 per Section 4.8.1 of District Rule 2201. The facility has proposed to use ERC Certificate S-4126-1 to offset the VOC emissions from this project.

<table>
<thead>
<tr>
<th>Quarter</th>
<th>Q1</th>
<th>Q2</th>
<th>Q3</th>
<th>Q4</th>
</tr>
</thead>
<tbody>
<tr>
<td>Days</td>
<td>90</td>
<td>91</td>
<td>92</td>
<td>92</td>
</tr>
<tr>
<td>Quantity of VOC Offsets Required (lb) without the distance ratio</td>
<td>118</td>
<td>120</td>
<td>121</td>
<td>121</td>
</tr>
<tr>
<td>Distance Ratio</td>
<td>1.5</td>
<td>1.5</td>
<td>1.5</td>
<td>1.5</td>
</tr>
<tr>
<td>Quantity of VOC Offsets Required (lb) with the distance ratio</td>
<td>177</td>
<td>180</td>
<td>182</td>
<td>182</td>
</tr>
<tr>
<td>Quantity of ERC’s Reserved from S-4126-1</td>
<td>177</td>
<td>180</td>
<td>182</td>
<td>182</td>
</tr>
</tbody>
</table>

The quantity of VOC credits available from the proposed emission reduction certificates is sufficient to offset emissions from the project.

C. Public Notification

1. Applicability

Public noticing is required for:
- a. Any new Major Source, which is a new facility that is also a Major Source,
- b. Major Modifications,
- c. Any new emissions unit with a Potential to Emit greater than 100 pounds during any one day for any one pollutant,
- d. Any project which results in the offset thresholds being surpassed, and/or
- e. Any project with an SSIPE of greater than 20,000 lb/year for any pollutant.

   a. New Major Source

   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.

   b. Major Modification

   As demonstrated in VII.C.7, this project triggers both an SB288 modification and a Federal Major Modification. Therefore, a public notice is required for Major Modification purposes.
c. 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 emission units in this project do not have a PE greater than 100 pounds per day for any pollutant. Therefore, public noticing is not required for this purpose.

d. Offset Threshold

The following table compares the SSPE1 with the SSPE2 in order to determine if any offset thresholds have been surpassed with this project.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>SSPE1 w/ERC (lb/year)</th>
<th>SSPE2 w/ERC (lb/year)</th>
<th>Offset Threshold</th>
<th>Offset Threshold Surpassed?</th>
</tr>
</thead>
<tbody>
<tr>
<td>NOx</td>
<td>2,069,786</td>
<td>2,076,180</td>
<td>20,000 lb/year</td>
<td>No</td>
</tr>
<tr>
<td>SOx</td>
<td>704,639</td>
<td>704,889</td>
<td>54,750 lb/year</td>
<td>No</td>
</tr>
<tr>
<td>PM10</td>
<td>503,670</td>
<td>504,336</td>
<td>29,200 lb/year</td>
<td>No</td>
</tr>
<tr>
<td>CO</td>
<td>99,437</td>
<td>100,751</td>
<td>200,000 lb/year</td>
<td>No</td>
</tr>
<tr>
<td>VOC</td>
<td>131,481</td>
<td>131,963</td>
<td>20,000 lb/year</td>
<td>No</td>
</tr>
</tbody>
</table>

The offset thresholds for NOx, SOx, PM10, and VOC have already been surpassed. Therefore, public notice is not required for this purpose.

e. SSIPE > 20,000 lb/year

Public notification is required for any permitting action that results in a Stationary Source Increase in Permitted Emissions (SSIPE) of more than 20,000 lb/year of any affected pollutant. According to District policy, the SSIPE is calculated as the Post Project Stationary Source Potential to Emit (SSPE2) minus the Pre-Project Stationary Source Potential to Emit (SSPE1), i.e., SSIPE = SSPE2 – SSPE1. The values for SSPE2 and SSPE1 are calculated according to Rule 2201, Sections 4.9 and 4.10, respectively. The SSIPE is compared to the SSIPE Public Notice thresholds in the following table:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>SSPE2 w/ERC (lb/year)</th>
<th>SSPE1 w/ERC (lb/year)</th>
<th>SSIPE (lb/year)</th>
<th>SSIPE Public Notice Threshold</th>
<th>Public Notice Required?</th>
</tr>
</thead>
<tbody>
<tr>
<td>NOx</td>
<td>2,076,180</td>
<td>2,069,786</td>
<td>6,394</td>
<td>20,000 lb/year</td>
<td>No</td>
</tr>
<tr>
<td>SOx</td>
<td>704,889</td>
<td>704,639</td>
<td>250</td>
<td>20,000 lb/year</td>
<td>No</td>
</tr>
<tr>
<td>PM10</td>
<td>504,336</td>
<td>503,670</td>
<td>666</td>
<td>20,000 lb/year</td>
<td>No</td>
</tr>
<tr>
<td>CO</td>
<td>100,751</td>
<td>99,437</td>
<td>1,314</td>
<td>20,000 lb/year</td>
<td>No</td>
</tr>
<tr>
<td>VOC</td>
<td>131,963</td>
<td>131,481</td>
<td>482</td>
<td>20,000 lb/year</td>
<td>No</td>
</tr>
</tbody>
</table>

As demonstrated in the table above, a public notice is not required for SSIPE greater than 20,000 lb/year.
2. Public Notice Action

As discussed above, public noticing is required for this project since the project triggers a Major Modification. Therefore, public notice documents will be submitted to the California Air Resources Board (CARB) and US EPA, and a public notice will be published in a local newspaper of general circulation prior to the issuance of the ATC for this equipment.

D. Daily Emission Limits (DELS)

Daily Emissions Limitations (DELS) and other enforceable conditions are required by Section 3.16 to restrict a unit’s maximum daily emissions, to a level at or below the emissions associated with the maximum design capacity. Per Sections 3.16.1 and 3.16.2, 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.

The following conditions will be included on each Authority to Construct permit for the lehrs:

- **This unit shall be fired on PUC-Quality natural gas.** [District Rules 2201 and 4102]

- **Emissions from the natural gas-fired lehr shall not exceed any of the following limits:**
  - 0.073 lb-NO/MMBtu (equivalent to 60 ppmvd NOx @ 3% O2),
  - 0.00285 lb-SOx/MMbtu,
  - 0.0076 lb-PM10/MMBtu,
  - 0.015 lb-CO/MMBtu (Equivalent to 20 ppmvd CO @ 3% O2),
  - or 0.0055 lb-VOC/MMBtu. [District Rule 2201]

E. Compliance Assurance

1. Source Testing

Pursuant to District Policy APR 1705, Section I.E,

> In establishing source test requirements it must be noted that certain types of equipment or operation do not lend themselves to source testing. Large Sources (i.e. too big for total enclosure) of fugitive emissions without a stack are an example of such sources.

The proposed lehrs are large sources that are not equipped with exhaust stacks. Furthermore, the lehrs will occupy a fairly tight space and operate at very high temperatures; therefore, erecting a temporary total enclosure for the purposes of source testing is neither safe nor practical. The lehrs are not conducive to source testing; therefore, source testing will not be required for these units.

2. Monitoring

No monitoring is required for District Rule 2201 compliance.
3. Recordkeeping

No recordkeeping requirements are required for compliance with District Rule 2201 requirements.

4. Reporting

Reporting is not required for District Rule 2201 for this operation.

F. Ambient Air Quality Analysis (AAQA)

An AAQA shall be conducted for the purpose of determining whether a new or modified Stationary Source will cause or make worse a violation of an air quality standard. The District's Technical Services Division conducted the required analysis. Refer to Appendix III of this document for the AAQA summary sheet.

The proposed location is in an attainment area for NOx, CO, and SOx. As shown by the AAQA summary sheet the proposed equipment will not cause a violation of an air quality standard for NOx, CO, or SOx.

The proposed location is in a non-attainment area for the state's PM10 as well as federal and state PM2.5 thresholds. As shown by the AAQA summary sheet the proposed equipment will not cause a violation of an air quality standard for PM10 and PM2.5.

G. Compliance Certification

Section 4.15.2 of this Rule requires the owner of a new Major Source or a source undergoing a Title I Modification to demonstrate to the satisfaction of the District that all other Major Sources owned by such person and operating in California are in compliance or are on a schedule for compliance with all applicable emission limitations and standards. As discussed in Section VIII above, this facility triggers a Federal Major Modification, therefore this requirement is applicable. Gallo also owns:

1. A Modesto Winery
2. A Livingston Winery; and
3. A Fresno Winery.

The application submitted by Gallo Glass Company states that all these sources currently comply with the applicable emission limitations and standards. Therefore, this requirement is satisfied.

H. Alternate Siting Analysis

The current project occurs at an existing facility. The applicant is proposing to replace two existing electric lehrs with natural gas-fired lehrs.

Use of the existing site will result in the least possible impact from the project. Alternative sites would involve the relocation and/or construction of various support structures on a much greater scale, and would therefore result in a much greater impact.
Rule 2410  Prevention of Significant Deterioration

As demonstrated earlier in this project, District Rule 2410 requirements are not applicable to this project.

Rule 2520  Federally Mandated Operating Permits

This facility is subject to this Rule, and has received their Title V Operating Permit. A significant permit modification is defined as a "permit amendment that does not qualify as a minor permit modification or administrative amendment. This project is a significant permit modification since the project is a Major Modification. Therefore, a public notice must be performed prior to issuance of the Authority to Construct permit.

As discussed above, the facility has applied for a Certificate of Conformity (COC). 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" applies to each glass furnace that commences construction or modification after June 15, 1979.

This rule is applicable to glass melting furnaces. A glass melting furnace is defined as "a unit comprising a refractory vessel in which raw materials are charged, melted at high temperature, refined, and conditioned to produce molten glass. The unit includes foundations, superstructure and retaining walls, raw material charger systems, heat exchangers, melter cooling system, exhaust system, refractory brick work, fuel supply and electrical boosting equipment, integral control systems and instrumentation, and appendages for conditioning and distributing molten glass to forming apparatuses. The forming apparatuses, including the float bath used in flat glass manufacturing and flow channels in wool fiberglass and textile fiberglass manufacturing, are not considered part of the glass melting furnace." The lehr's anneal glass that has already been distributed to the forming apparatuses and are not included in the definition of a glass melting furnace. Therefore, Subpart CC requirements are not applicable to the natural gas-fired lehr's proposed in this project.

Rule 4002  National Emission Standards for Hazardous Air Pollutants


This rule is applicable to glass melting furnaces. A glass melting furnace is defined as: "a unit comprising a refractory vessel in which raw materials are charged, melted at high temperature, refined, and conditioned to produce molten glass. The unit includes foundations, superstructure and retaining walls, raw material charger systems, heat exchangers, melter cooling system, exhaust system, refractory brick work, fuel supply and electrical boosting equipment, integral control systems and instrumentation, and
appendages for conditioning and distributing molten glass to forming apparatuses. The forming apparatuses, including the float bath used in flat glass manufacturing and flow channels in wool fiberglass and textile fiberglass manufacturing, are not considered part of the glass melting furnace. The lehr's anneal glass that has already been distributed to the forming apparatuses and are not included in the definition of a glass melting furnace. Therefore, Subpart N requirements are not applicable to the natural gas-fired lehr's proposed in this project.

40 CFR Part 63 Subpart SSSSSS, National Emission Standards for Hazardous Air Pollutants for Glass Manufacturing Area Sources

The requirements of Subpart SSSSSS are applicable to glass melting furnaces. A glass melting furnace is defined in this subpart as: "a unit comprising a refractory-lined vessel in which raw materials are charged and melted at high temperature to produce molten glass." The lehr's do not meet the definition of a glass melting furnace; therefore Subpart SSSSSS requirements are not applicable to the lehr's.

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 condition will be listed on each of the Authority to Construct permits:

- {4383} No air contaminant 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

Section 4.0 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 condition will be included on each of the Authority to Construct permits:

- 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.

A risk management review (RMR) was conducted. The following table summarizes the results of the RMR. For the complete summary, please see Appendix III.

<table>
<thead>
<tr>
<th>Categories</th>
<th>Lehr (Unit 17-0)</th>
<th>Lehr (Unit 18-0)</th>
<th>Project Totals</th>
<th>Facility Totals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Prioritization Score</td>
<td>0.01</td>
<td>0.01</td>
<td>0.02</td>
<td>&gt;1.0</td>
</tr>
<tr>
<td>Acute Hazard Index</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.01</td>
</tr>
<tr>
<td>Chronic Hazard Index</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Maximum Individual Cancer Risk (10⁻⁶)</td>
<td>1.13</td>
<td>1.13</td>
<td>2.26</td>
<td>4.77</td>
</tr>
<tr>
<td>T-BACT Required?</td>
<td>Yes</td>
<td>Yes</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Special Permit Conditions?</td>
<td>No</td>
<td>No</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

T-BACT

T-BACT is triggered for VOC and PM10. Pursuant to District Policy APR 1905, T-BACT is the most stringent emission limitation or control technique for hazardous air pollutants of the following:

1. Has been achieved in practice for such emissions unit and class of source; or
2. Is contained in any State Implementation Plan approved by the Environmental Protection Agency for such emissions unit category and class of source. A specific limitation or control technique shall not apply if the owner or operator of the proposed emissions unit demonstrates to the satisfaction of the APCO that such limitation or control technique is not presently achievable; or
3. Is contained in any Federal Standard promulgated pursuant to FCAA Section 111 (NSPS) or Section 112 (MACT) for such emissions unit category and class of source; or
4. Is any other emission limitation or control technique, including process and equipment changes of basic or control equipment, found by the APCO to be technologically feasible for such class or category of sources or for a specific source, and cost effective as determined by the District.

The use of electric lehrs was determined to not be cost effective (See Appendix II of this document. There is no SIP-Approved rules that require VOC or PM10 reductions from this class and category of source, and there is no NSPS or MACT Standards that apply to this class and category of source. The use of PUC-Quality natural gas is the most effective control technology identified for this class and category of source; thus, the following condition will be included on each of the Authority to Construct permits for T-BACT:

- This unit shall be fired on PUC-Quality natural gas. [District Rules 2201 and 4102]
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.

This requirement is applicable to units that are equipped with exhaust stacks. The lehr emissions are fugitive and are not directed through an exhaust stack; therefore, the requirements of District Rule 4201 are not applicable to the lehrs.

Rule 4301 Fuel Burning Equipment

This rule applies to fuel burning equipment, which is defined 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 lehrs are a direct-fired unit and do not produce heat or power by indirect heat transfer. Therefore, the requirements of District Rule 4301 are not applicable to the lehrs.

District Rule 4309 Dryers, Dehydrators, and Ovens

Section 4.1.7 states the units with all of the following characteristics are exempt from District Rule 4309 requirements:

1. There is no stack for the exhaust gas, and
2. One or more sides are open to the atmosphere.

The proposed lehrs do not have exhaust stacks and the lehrs have sides that are open to the atmosphere; therefore, District Rule 4309 requirements are not applicable to the proposed lehrs.

District Rule 4801 Sulfur Compounds

Per Section 3.1, 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 (2000 ppmvd) calculated as SO₂ on a dry basis averaged over 15 consecutive minutes.

**Natural Gas Combustion:**

EPA F-Factor for Natural Gas: 8,710 dscf/MMBtu at 68 °F, equivalent to

\[
Corrected \ F \ - \ factor = \left( \frac{8,710 \text{ dscf}}{\text{MMBtu}} \right) \times \left( \frac{60^\circ F + 459.6}{68^\circ F + 459.6} \right) = 8,578 \frac{\text{dscf}}{\text{MMBtu}} \ \text{at} \ 60^\circ F
\]
Therefore, compliance with District Rule 4801 requirements is expected.

40 CFR Part 64 Compliance Assurance Monitoring

40 CFR Part 64 requires Compliance Assurance Monitoring (CAM) for units that meet the following three criteria:

1) the unit must have an emission limit for the pollutant;
2) the unit must have add-on controls for the pollutant; these are devices such as flue gas recirculation (FGR), baghouses, and catalytic oxidizers; and
3) the unit must have a pre-control potential to emit of greater than the major source thresholds.

The natural gas-fired lehr's are not equipped with any add-on controls; therefore, CAM requirements are not applicable to the natural gas-fired lehr's.

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 prepared or will prepare an environmental review document for the project. Thus the District is the Lead Agency for this project.
On December 17, 2009, the District's Governing Board adopted a policy, APR 2005, *Addressing GHG Emission Impacts for Stationary Source Projects Under CEQA When Serving as the Lead Agency*, for addressing GHG emission impacts when the District is Lead Agency under CEQA and approved the District's guidance document for use by other agencies when addressing GHG impacts as lead agencies under CEQA. Under this policy, the District's determination of significance of project-specific GHG emissions is founded on the principal that projects with GHG emission reductions consistent with AB 32 emission reduction targets are considered to have a less than significant impact on global climate change. Consistent with District Policy 2005, projects complying with an approved GHG emission reduction plan or GHG mitigation program, which avoids or substantially reduces GHG emissions within the geographic area in which the project is located, would be determined to have a less than significant individual and cumulative impact for GHG emission.

The California Air Resources Board (ARB) adopted a Cap-and-Trade regulation as part one of the strategies identified for AB 32. This Cap-and-Trade regulation is a statewide plan, supported by a CEQA compliant environmental review document, aimed at reducing or mitigating GHG emissions from targeted industries. Facilities subject to the Cap-and-Trade regulation are subject to an industry-wide cap on overall GHG emissions. Any growth in emissions must be accounted for under that cap such that a corresponding and equivalent reduction in emissions must occur to allow any increase. Further, the cap decreases over time, resulting in an overall decrease in GHG emissions.

Under District policy APR 2025, *CEQA Determinations of Significance for Projects Subject to ARB's GHG Cap-and-Trade Regulation*, the District finds that the Cap-and-Trade is a regulation plan approved by ARB, consistent with AB32 emission reduction targets, and supported by a CEQA compliant environmental review document. As such, consistent with District Policy 2005, projects complying project complying with Cap-and-Trade requirements are determined to have a less than significant individual and cumulative impact for GHG emissions.

Facility N-1662 is subject to the Cap-and-Trade regulation. Therefore, as discussed above, consistent with District Policies APR 2005 and APR 2025, the District concludes that the GHG emissions increases associated with this project would have a less than significant individual and cumulative 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 the activity will occur at an existing facility and the project involves negligible expansion of the existing use. Furthermore, the District determined that the activity will not have a significant effect on the environment. 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 general rule that CEQA applies only to projects which have the potential for causing a significant effect on the environment (CEQA Guidelines §15061(b)(3)).
IX. Recommendation

Compliance with all applicable rules and regulations is expected. Issue Authority to Construct permits N-1662-17-0 and -18-0 subject to the permit conditions on the attached draft Authorities to Construct permit in Appendix I.

X. Billing Information

<table>
<thead>
<tr>
<th>Permit Number</th>
<th>Fee Schedule</th>
<th>Fee Description</th>
<th>Previous Fee Schedule</th>
</tr>
</thead>
<tbody>
<tr>
<td>N-1662-17-0</td>
<td>3020-02-G</td>
<td>5 MMBtu/hr</td>
<td>N/A</td>
</tr>
<tr>
<td>N-1662-18-0</td>
<td>3020-02-G</td>
<td>5 MMBtu/hr</td>
<td>N/A</td>
</tr>
</tbody>
</table>

Appendices

I: Draft Authority to Construct Permits
II: BACT Guideline 1.5.10 and Top-Down BACT Analysis
III: Risk Management Review and Ambient Air Quality Analysis Results
IV: Quarterly Net Emissions Change (QNEC)
APPENDIX I

Draft Authority to Construct Permits
AUTHORITY TO CONSTRUCT

PERMIT NO: N-1662-17-0

LEGAL OWNER OR OPERATOR: GALLO GLASS COMPANY
MAILING ADDRESS: PO BOX 1230
                    MODESTO, CA 95353
LOCATION: 605 S SANTA CRUZ AVE
           MODESTO, CA 95354

EQUIPMENT DESCRIPTION:
5.0 MMBTU/HR NATURAL GAS-FIRED LEHR WITH ECLIPSE RA0075 BURNERS, OR EQUIVALENT (LEHR SHOP #21 SERVING GLASS FURNACE #2)

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. Prior to operating equipment under this Authority to Construct, permittee shall surrender NOx emission reduction credits for the following quantity of emissions (not including the offset ratio): 1st quarter - 788 lb, 2nd quarter - 797 lb, 3rd quarter - 806 lb, and 4th quarter - 806 lb. Offsets shall be provided at a distance offset ratio 1.5 to 1. [District Rule 2201] Federally Enforceable Through Title V Permit

4. Prior to operating equipment under this Authority to Construct, permittee shall surrender PM10 emission reduction credits for the following quantity of emissions (not including the offset ratio): 1st quarter - 59 lb, 2nd quarter - 83 lb, 3rd quarter - 84 lb, and 4th quarter - 84 lb. Offsets shall be provided at the applicable offset ratio specified in District Rule 2201 (as amended 4/21/11). [District Rule 2201] Federally Enforceable Through Title V Permit

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.

Seyed Sadredin, Executive Director APCO

Arnaud Marjollel, Director of Permit Services
Northern Regional Office • 4800 Enterprise Way • Modesto, CA 95356-8718 • (209) 557-6400 • Fax (209) 557-6475
5. Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantity of emissions (not including the offset ratio): 1st quarter - 59 lb, 2nd quarter - 60 lb, 3rd quarter - 60 lb, and 4th quarter - 60 lb. Offsets shall be provided at a distance offset ratio of 1.5 to 1. [District Rule 2201] Federally Enforceable Through Title V Permit

6. ERC certificates S-4126-1, N-900-2, and N-161-4 (or a certificate split from these certificates) shall be used to supply the required offsets, unless a revised offset proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit

7. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

8. 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)] Federally Enforceable Through Title V Permit

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

10. This unit shall be fired on PUG-Quality natural gas. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit

11. Emissions from the natural gas-fired boilers shall not exceed any of the following limits: 0.073 lb-NO/MMBtu (equivalent to 60 ppmvd NOX @ 3% O2), 0.00285 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.015 lb-CO/MMBtu (Equivalent to 20 ppmvd CO @ 3% O2), or 0.0055 lb-VOC/MMBtu. [District Rule 2201]

12. 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 beginning on the date the unit starts operation under this permit 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 N-1141107 and N-1142733, which are the public notice and modeling requirements of 40 CFR 52.21 (June 16, 2011 version). [District Rule 2201] Federally Enforceable Through Title V Permit

13. 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 Rule 2201] Federally Enforceable Through Title V Permit
Authority to Construct

Permit No: N-1662-18-0

Legal Owner or Operator: Gallo Glass Company

Mailing Address: PO Box 1230
 MODESTO, CA 95353

Location: 605 S Santa Cruz Ave
 MODESTO, CA 95354

Equipment Description:
5.0 MMBTU/HR Natural Gas-Fired LEHR with Eclipse RA0075 Burners, or Equivalent (LEHR Shop #23 Serving Glass Furnace #2)

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. Prior to operating equipment under this Authority to Construct, permittee shall surrender NOx emission reduction credits for the following quantity of emissions (not including the offset ratio): 1st quarter - 788 lb, 2nd quarter - 797 lb, 3rd quarter - 806 lb, and 4th quarter - 806 lb. Offsets shall be provided at a distance offset ratio 1.5 to 1. [District Rule 2201] Federally Enforceable Through Title V Permit

4. Prior to operating equipment under this Authority to Construct, permittee shall surrender PM10 emission reduction credits for the following quantity of emissions (not including the offset ratio): 1st quarter - 60 lb, 2nd quarter - 83 lb, 3rd quarter - 84 lb, and 4th quarter - 84 lb. Offsets shall be provided at the applicable offset ratio specified in District Rule 2201 (as amended 4/21/11). [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.

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Arnaud Marjolle, Director of Permit Services
Northern Regional Office • 4800 Enterprise Way • Modesto, CA 95356-8718 • (209) 557-6400 • Fax (209) 557-6476
5. Prior to operating equipment under this Authority to Construct, permittee shall surrender VOC emission reduction credits for the following quantity of emissions (not including the offset ratio): 1st quarter - 59 lb, 2nd quarter - 60 lb, 3rd quarter - 61 lb, and 4th quarter - 61 lb. Offsets shall be provided at a distance offset ratio of 1.5 to 1. [District Rule 2201] Federally Enforceable Through Title V Permit

6. ERC certificates S-4126-1, N-900-2, and N-161-4 (or a certificate split from these certificates) shall be used to supply the required offsets, unless a revised offsetting proposal is received and approved by the District, upon which this Authority to Construct shall be reissued, administratively specifying the new offsetting proposal. Original public noticing requirements, if any, shall be duplicated prior to reissuance of this Authority to Construct. [District Rule 2201] Federally Enforceable Through Title V Permit

7. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit

8. 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)] Federally Enforceable Through Title V Permit

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

10. This unit shall be fired on PUC-Quality natural gas. [District Rules 2201 and 4102] Federally Enforceable Through Title V Permit

11. Emissions from the natural gas-fired lehr shall not exceed any of the following limits: 0.073 lb-NO/MMBtu (equivalent to 60 ppmvd NOx @ 3% O2), 0.0085 lb-SOx/MMBtu, 0.0076 lb-PM10/MMBtu, 0.015 lb-CO/MMBtu (Equivalent to 20 ppmvd CO @ 3% O2), or 0.0055 lb-VOC/MMBtu. [District Rule 2201]

12. 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 beginning on the date the unit starts operation under this permit 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 N-1141107 and N-1142733, which are the public notice and modeling requirements of 40 CFR 52.21 (June 16, 2011 version). [District Rule 2201] Federally Enforceable Through Title V Permit

13. 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 Rule 2201] Federally Enforceable Through Title V Permit
APPENDIX II

BACT Guideline 1.5.10 and Top-Down BACT Analysis
Best Available Control Technology (BACT) Guideline 1.5.10
Last Update: 6/19/2006

Container Glass Production - Container Glass Lehr

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Achieved in Practice or in the SIP</th>
<th>Technologically Feasible</th>
<th>Alternate Basic Equipment</th>
</tr>
</thead>
<tbody>
<tr>
<td>CO</td>
<td>Natural gas-fired container glass lehr with emissions of 20 ppmv CO @ 3% O2 or 0.015 lb-CO/MMBtu and using LPG backup fuel</td>
<td></td>
<td>Electric Lehr</td>
</tr>
<tr>
<td>NOx</td>
<td>Natural gas-fired container glass lehr with emissions of 60 ppmv NOx @ 3% O2 or 0.073 lb-NOx/MMBtu and using LPG backup fuel</td>
<td></td>
<td>Electric Lehr</td>
</tr>
<tr>
<td>PM10</td>
<td>Electric Lehr</td>
<td></td>
<td></td>
</tr>
<tr>
<td>SOx</td>
<td>Electric Lehr</td>
<td></td>
<td></td>
</tr>
<tr>
<td>VOC</td>
<td>Electric Lehr</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

BACT is the most stringent control technique for the emissions unit and class of source. Control techniques that are not achieved in practice or contained in a state implementation plan must be cost effective as well as feasible. Economic analysis to demonstrate cost effectiveness is required for all determinations that are not achieved in practice or contained in an EPA approved State Implementation Plan.

This is a Summary Page for this Class of Source. For background information, see Permit Specific BACT Determinations on Details Page.
Top Down BACT Analysis for NOx, PM10, and VOC

I. BACT Analysis for Glass Lehirs N-1662-17-0 and '-18-0

BACT is required for NOx, PM10, and VOC emissions from the natural gas-fired Lehrs. District BACT Guideline 1.5.10 for Container Glass Production — Container Glass Lehr is applicable to the proposed units.

a. Step 1 - Identify All Possible Control Technologies

The following control technologies were identified in District BACT Guideline 1.5.10.

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Achieved in Practice or contained in SIP</th>
<th>Technologically Feasible</th>
<th>Alternate Basic Equipment</th>
</tr>
</thead>
<tbody>
<tr>
<td>NOx</td>
<td>Natural gas-fired container glass lehr with emissions of 60 ppmv NOx @ 3% O2 or 0.073 lb-NOx/MMBtu and using LPG backup fuel</td>
<td>Electric Lehr</td>
<td></td>
</tr>
<tr>
<td>PM10</td>
<td></td>
<td>Electric Lehr</td>
<td></td>
</tr>
<tr>
<td>VOC</td>
<td></td>
<td>Electric Lehr</td>
<td></td>
</tr>
</tbody>
</table>

The Environmental Protection Agency (EPA), California Air Resources Board (CARB), South Coast Air Quality Management District (SCAQMD), and Bay Area Air Quality Management District (BAAQMD) BACT Clearinghouses were reviewed to determine potential control technologies for this class and category of operation. No BACT Guidelines were identified for container glass lehrs.

The District identified several facilities operating natural gas-fired lehrs at container glass production facilities. NOx emissions from the lehrs identified were equal to or greater than what is currently listed in the table above, and no additional control techniques were identified. Additionally, the District contacted Eclipse, a Low-NOx burner manufacturer, to determine whether low-NOx burners may be utilized in this type of unit. Pursuant to Chad Holstrum of Eclipse, 60 ppmv NOx @ 3% O2 is the lowest NOx option available for this type of unit. Low-NOx and Ultra-Low NOx burners aren't capable of achieving the turndown ratio requirements for a glass annealing lehr.

b. Step 2 - Eliminate Technologically Infeasible Options

There are no infeasible options.
c. Step 3 - Rank Remaining Control Technologies by Control Effectiveness

NOx Emissions:

<table>
<thead>
<tr>
<th>Rank</th>
<th>Control Technology</th>
<th>Achieved in Practice</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Electric Furnace</td>
<td>N/A, Alternate Basic Equipment</td>
</tr>
<tr>
<td>2</td>
<td>Natural gas-fired container glass lehr with emissions of 60 ppm NOx @ 3% O2 or 0.073 lb-NOx/MMBtu and using LPG backup fuel</td>
<td>Y</td>
</tr>
</tbody>
</table>

PM10 Emissions:

<table>
<thead>
<tr>
<th>Rank</th>
<th>Control Technology</th>
<th>Achieved in Practice</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Electric Lehr</td>
<td>N/A, Alternate Basic Equipment</td>
</tr>
<tr>
<td>2</td>
<td>None</td>
<td>Y</td>
</tr>
</tbody>
</table>

VOC Emissions:

<table>
<thead>
<tr>
<th>Rank</th>
<th>Control Technology</th>
<th>Achieved in Practice</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Electric Lehr</td>
<td>N/A, Alternate Basic Equipment</td>
</tr>
<tr>
<td>2</td>
<td>None</td>
<td>Y</td>
</tr>
</tbody>
</table>

d. Step 4 - Cost Effectiveness Analysis

A cost effective analysis is required for the alternate basic equipment option, the use of an electric lehr. The following cost analysis is applicable to each proposed lehr.

**Cost Effective Analysis for Electric Lehr**

**Emission Reducetions**

The use of an electric lehr would result in zero emissions, thus, the emission reductions for each lehr are equal to the potential to emit from each lehr. The emission reductions for each lehr are:

- NOx: 3,197 lb/year (1.6 tons/year)
- PM10: 333 lb/year (0.2 tons/year)
- VOC: 241 lb/year (0.1 tons/year)
Annual Natural Gas Cost

Each lehr is rated at 5.0 MMBtu/hr and operates 8,760 hours/year. Thus, the annual fuel usage is:

\[
\text{Annual Fuel Usage} = 5.0 \text{ MMBtu/hr} \times 8,760 \text{ hr/year} \times 1000 \text{ scf/MMBtu}
\]

\[
\text{Annual Fuel Usage} = 43,800,000 \text{ scf/year}
\]

The average natural gas price during the past 12 months of data available (August 2013 through July 2014) from the California Natural Gas Industrial Prices compiled by the US Department of Energy - Energy Information Administration database is 7.36 dollars per 1000 scf of natural gas consumed. Using this price, the annual fuel cost for natural gas for each lehr is:

\[
\text{Annual Fuel Cost} = 43,800,000 \text{ scf/year} \times \$7.36/1000 \text{ scf}
\]

\[
\text{Annual Fuel Cost} = \$322,368
\]

Annual Electricity Cost

The existing electric lehrs are rated at 420 kW each and can process up to 130 tons per day each. The lehr capacity is increasing to 160 tons per day, each, in this project. Thus, new electric lehrs would need to be purchased and installed. It is assumed that the kW energy rating for a lehr is linearly related to the production capacity. Thus,

\[
\text{Replacement Lehr} = 420 \text{ kW} \times 160 \text{ tons/day} + 130 \text{ tons/day}
\]

\[
\text{Replacement Lehr} = 517 \text{ kW}
\]

The annual electricity usage for each lehr is:

\[
\text{Annual Electricity Usage} = 517 \text{ kW/hr} \times 8,760 \text{ hr/year}
\]

\[
\text{Annual Electricity Usage} = 4,528,920 \text{ kW/year}
\]

PG&E's current average annual total electricity rate for industrial/general service (E-20, October 2014 data) is $0.14049/kWh for a primary firm. This rate will be used to calculate the annual electricity cost.

\[
\text{Annual Electricity Cost} = 4,528,920 \text{ kW/year} \times $0.14049/\text{kWh}
\]

\[
\text{Annual Electricity Cost} = \$636,268/\text{year}
\]
**Multi-pollutant Cost Effectiveness Threshold**

Since the use of an electric lehr will result in reductions of emissions from multiple pollutants, District practice is to use a multi-pollutant cost effectiveness threshold (MCET) to determine whether a control technology is cost effective. The MCET is calculated below.

\[
\text{MCET} = 1.6 \text{ tons-NOx/year} \times \$24,500/\text{ton-NOx} + \\
0.2 \text{ tons-PM10/year} \times \$11,400/\text{ton-PM10} + \\
0.1 \text{ tons-VOC/year} \times \$17,500/\text{ton-VOC}
\]

\[
\text{MCET} = $43,230/\text{year}
\]

**Cost Effectiveness Determination**

Typically, the cost effectiveness for alternate basic equipment is determined by dividing the difference between the annualized cost of the alternate basic equipment and annualized cost of the proposed equipment by the emission reductions that would be achieved by installing the alternate basic equipment (see the equation below).

\[
CE_{ALT} = \frac{\text{Cost}_{ALT} - \text{Cost}_{Basic}}{Emissions_{Basic} - Emissions_{ALT}}
\]

\(CE_{ALT}\) is then compared with the cost effectiveness threshold for the pollutant that is being evaluated. However, in this case the alternate basic equipment controls multiple pollutants. When a control option controls multiple pollutants, the District uses the MCET to evaluate the cost effectiveness of the control option. The MCET method already factors in the emission reductions. Since \(Emissions_{Basic} - Emissions_{ALT}\) is already factored in by the use of the MCET, the cost is reduced to:

\[
CE_{ALT} = \text{Cost}_{ALT} - \text{Cost}_{Basic}
\]

Where,

\(\text{Cost}_{ALT}\) = The annualized cost for the alternate basic equipment.
\(\text{Cost}_{Basic}\) = The annualized cost for the proposed equipment.

The proposed basic equipment is a natural gas-fired lehr. The alternate basic equipment option is the use of an electric lehr. The capital cost of an electric lehr is expected to be equal to or greater than the capital cost of a natural gas-fired lehr. Thus, the capital cost from the two options will cancel out when the difference is taken. The fuel cost of the natural gas-fired lehr will be used for \(\text{Cost}_{Basic}\), while the electricity cost will be used for \(\text{Cost}_{ALT}\). Thus,
CE\textsubscript{ALT} = Cost\textsubscript{ALT} - Cost\textsubscript{Basic}
CE\textsubscript{ALT} = Electricity Cost - Fuel Cost
CE\textsubscript{ALT} = $636,280/year - $322,368/year
CE\textsubscript{ALT} = $313,912/year

Since CE\textsubscript{ALT} ($313,912/year), is greater than the MCET ($43,230/year), the use of an electric lehr is not cost effective.

e. Step 5 - Select BACT

The use of an electric lehr was determined to not be cost effective. Thus, BACT is the following:

<table>
<thead>
<tr>
<th></th>
<th>Natural gas-fired container glass lehr with emissions of 60 ppmv NO\textsubscript{x} @ 3% O\textsubscript{2} or 0.073 lb-NO\textsubscript{x}/MMBtu and using LPG backup fuel</th>
</tr>
</thead>
<tbody>
<tr>
<td>NO\textsubscript{x}</td>
<td>None</td>
</tr>
<tr>
<td>PM10</td>
<td>None</td>
</tr>
<tr>
<td>VOC</td>
<td>None</td>
</tr>
</tbody>
</table>

The applicant has proposed this level of control. Therefore, BACT requirements for NO\textsubscript{x}, SO\textsubscript{x}, PM10, and VOC are satisfied.
APPENDIX III

Risk Management Review and Ambient Air Quality Analysis Results
San Joaquin Valley Air Pollution Control District
Risk Management Review

To: James Harader AQE—Permit Services
From: Esteban Gutierrez AQS—Technical Services
Date: September 18, 2014
Facility Name: Gallo Glass
Location: 605 S Santa Cruz Modesto CA
Application #(s): N-1662-17-0 & 18-0
Project #: N-1142733

A. RMR SUMMARY

<table>
<thead>
<tr>
<th>Categories</th>
<th>Lehr (Unit 17-0)</th>
<th>Lehr (Unit 18-0)</th>
<th>Project Totals</th>
<th>Facility Totals</th>
</tr>
</thead>
<tbody>
<tr>
<td>Prioritization Score</td>
<td>0.01</td>
<td>0.01</td>
<td>0.02</td>
<td>&gt;1.0</td>
</tr>
<tr>
<td>Acute Hazard Index</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.01</td>
</tr>
<tr>
<td>Chronic Hazard Index</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
<td>0.00</td>
</tr>
<tr>
<td>Maximum Individual Cancer Risk ($10^{-6}$)</td>
<td>1.13</td>
<td>1.13</td>
<td>2.26</td>
<td>4.77</td>
</tr>
<tr>
<td>T-BACT Required?</td>
<td>Yes</td>
<td>Yes</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Special Permit Conditions?</td>
<td>Yes</td>
<td>Yes</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Proposed Permit Conditions

To ensure that human health risks will not exceed District allowable levels, the following permit conditions must be included for:

Unit # 17-0&18-0

No special conditions are required.

T-BACT is required for this unit because of emissions of Natural gas combustion which is a VOC/PM-10. In accordance with District policy, BACT for this unit will be considered to be T-BACT.
B. RMR REPORT

I. Project Description

Technical Services received a request on June 17, 2004, to perform an Ambient Air Quality Analysis and a Risk Management Review for the installation of two new natural gas Lehrs at a glass plant.

II. Analysis

Technical Services performed a health risk assessment using the Toxic Fugitive Emissions from External combustion of natural gas. The cumulative prioritization scores were greater than 1.0, thus modeling was conducted using the AERMOD model, with the parameters outlined below and meteorological data for 2005-2009 from Bakersfield to determine the dispersion factors (i.e., the predicted concentration or X divided by the normalized source strength or Q) for a receptor grid.

### Analysis Parameters

<table>
<thead>
<tr>
<th>Source Type</th>
<th>Area</th>
<th>Location Type</th>
<th>Rural</th>
</tr>
</thead>
<tbody>
<tr>
<td>X-Length (m)</td>
<td>19.2</td>
<td>Closest Receptor (m)</td>
<td>48</td>
</tr>
<tr>
<td>Y-Length (m)</td>
<td>3.5</td>
<td>Type of Receptor</td>
<td>Residential</td>
</tr>
<tr>
<td>Release Height (m)</td>
<td>42.4</td>
<td>Pollutant Type</td>
<td>VOC/PM</td>
</tr>
<tr>
<td>Emission Rate (MMscf/Yr)</td>
<td>43.8</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Technical Services performed modeling for criteria pollutants CO, NOx, SOx and PM$_{10}$; as well as a RMR. The emission rates used for criteria pollutant modeling were 0.075 lb/hr CO, 0.37 lb/hr NOx, 0.013 lb/hr SOx, and 0.038 lb/hr PM$_{10}$. The engineer supplied the maximum fuel rate for the IC engine used during the analysis.

The results from the Criteria Pollutant Modeling are as follows:

### Criteria Pollutant Modeling Results*

<table>
<thead>
<tr>
<th>Diesel ICE</th>
<th>1 Hour</th>
<th>3 Hours</th>
<th>8 Hours</th>
<th>24 Hours</th>
<th>Annual</th>
</tr>
</thead>
<tbody>
<tr>
<td>CO</td>
<td>Pass</td>
<td>X</td>
<td>Pass</td>
<td>X</td>
<td>Pass</td>
</tr>
<tr>
<td>NOx</td>
<td>Pass</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>Pass</td>
</tr>
<tr>
<td>SOx</td>
<td>Pass</td>
<td>Pass</td>
<td>X</td>
<td>Pass</td>
<td>Pass</td>
</tr>
<tr>
<td>PM$_{10}$</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>Pass$^1$</td>
<td>Pass$^1$</td>
</tr>
<tr>
<td>PM$_{2.5}$</td>
<td>X</td>
<td>X</td>
<td>X</td>
<td>Pass$^1$</td>
<td>Pass$^1$</td>
</tr>
</tbody>
</table>

*Results were taken from the attached PSD spreadsheet.

$^1$The criteria pollutants are below EPA's level of significance as found in 40 CFR Part 51.166 (b)(2).
III. Conclusion

The acute and chronic indices are below 1.0 and the cancer risk associated with the project is greater than 1.0 in a million, but less than 10 in a million. In accordance with the District’s Risk Management Policy, the project is approved with Toxic Best Available Control Technology (T-BACT).

To ensure that human health risks will not exceed District allowable levels; the permit conditions listed on page 1 of this report must be included for this proposed unit.

These conclusions are based on the data provided by the applicant and the project engineer. Therefore, this analysis is valid only as long as the proposed data and parameters do not change.

The emissions from the proposed equipment will not cause or contribute significantly to a violation of the State and National AAQS.

IV. Attachments

A. RMR request from the project engineer
B. Additional information from the applicant/project engineer
C. Toxic emissions summary
D. Prioritization score
E. Facility Summary
APPENDIX IV

Quarterly Net Emissions Change
### QNEC Calculations

QNEC = (PE2 - BE) + 4

BE is equal to zero. Therefore,

QNEC = PE2 ÷ 4

**N-1662-17-0**

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>PE2 (lb/year)</th>
<th>QNEC (lb/qtr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>NOx</td>
<td>3,197</td>
<td>799.25</td>
</tr>
<tr>
<td>SOx</td>
<td>125</td>
<td>31.25</td>
</tr>
<tr>
<td>PM10</td>
<td>333</td>
<td>83.25</td>
</tr>
<tr>
<td>CO</td>
<td>657</td>
<td>164.25</td>
</tr>
<tr>
<td>VOC</td>
<td>241</td>
<td>60.25</td>
</tr>
</tbody>
</table>

**N-1662-18-0**

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>PE2 (lb/year)</th>
<th>QNEC (lb/qtr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>NOx</td>
<td>3.197</td>
<td>799.25</td>
</tr>
<tr>
<td>SOx</td>
<td>125</td>
<td>31.25</td>
</tr>
<tr>
<td>PM10</td>
<td>333</td>
<td>83.25</td>
</tr>
<tr>
<td>CO</td>
<td>657</td>
<td>164.25</td>
</tr>
<tr>
<td>VOC</td>
<td>241</td>
<td>60.25</td>
</tr>
</tbody>
</table>